



2600 Virginia Ave. N.W.
Suite 123
Washington, DC 20037

T 202-298-6449
F 202-298-5547
www.appraisalinstitute.org

October 24, 2003

Mr. Tom Dennis
Editorial Page Editor
Grand Forks Herald
375 2nd Avenue North
Grand Forks, ND 58203

Dear Mr. Dennis,

We recently read the letter to the editor in your newspaper entitled, "VIEWPOINT: Land-appraisal integrity benefits ducks and humans," written by Steven Williams, Director of the U.S. Fish and Wildlife Service. We agree with Director Williams and support the Department of Interior's appraisal reforms.

As Mr. Williams points out, as far back as 1968 and even before, the Department of Interior Inspector General's have called for the consolidation of Interior's appraisal offices to resolve two fundamental conflicts: the appraisers' subordination to realty professionals; and, perhaps more problematic, individuals who serve as both appraisers and negotiators, sometimes on the same transactions. The General Accounting Office and The Appraisal Foundation expressed similar concerns with the Department's appraisal process. In response to these critiques, Secretary of the Interior Gale Norton formed an internal working group to examine this issue in more detail earlier this year.

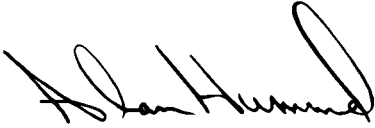
Comprised of senior departmental leaders, this group reviewed relevant history and data and unanimously recommended that Interior consolidate the various appraisal functions within a departmental administrative office. Secretary Norton endorsed the group's recommendations on June 19, 2003.

Some have mischaracterized this appraisal reform effort and suggested it is an attempt to do away with conservation tools such as easements and other land transactions that have helped to preserve grasslands, wetlands, and prairie potholes across the northern United States. This is far from the truth.

In our view, consolidating the appraisal functions will ensure that appraisals are credible and free from inappropriate outside influence. This alone will help restore public confidence in Interior's land acquisition and exchange programs. Under the appraisal reforms, appraisers will remain in the field, but will report up a chain of command to other appraisers, not to the realty specialists responsible for negotiating the transactions.

Other federal agencies should heed the lessons learned by the Department of Interior and consider creating centralized appraisal offices in their departments. The Interior appraisal reforms will help ensure appraiser independence.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Hummel". The signature is fluid and cursive, with a large, prominent loop at the end.

Alan E. Hummel, SRA
President