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Helena, MT 59620
November 4, 2011

Jon Jarvis, Director
National Park Service
1849 C Street NW
Washington, DC 20240

RE: LWCF State and Local Assistance Program
Proposed Competitive State Grant Program
Montana Comments (*submitted via joel_lynch@nps.gov*)

Dear Mr. Jarvis:

Thank you for the opportunity to provide input on America's Great Outdoors and the proposed national competitive grant program within the Stateside Land & Water Conservation Fund (LWCF). We've reviewed the proposal sent via email on November 25, 2011, and provide the following comments.

1. The AGO priority descriptions are easy to support. The concept of urban parks and community green spaces give a state like Montana some pause given our small population and a lack of classically defined "urban" population but we overall support the approach.
2. This proposed grant program is an interesting concept, but would provision Stateside LWCF with \$78 million while giving a new National program a higher level of funding. This proposal seems upside down at best. Stateside LWCF needs equitable funding before a new program is established. Also, for Montana, that would translate to approximately \$735,000 per year. Given the total unmet outdoor recreational needs throughout Montana and the minimal LWCF funding received in recent years, far more needs to be done. It is far from the equitable "full funding" discussions for stateside LWCF.
3. We do not support a new nationally competitive grant program. Through the process of establishing AGO, Montana has consistently advocated for additional support and renewed emphasis on the existing LWCF grant program. There is legitimate concern questioning the need for another program.



4. Additionally there is concern a new program will face political influence and organizational bias over the enormous backlog of established needs for conservation and recreation in the existing Stateside LWCF program. In support of that statement, consider that this new grant concept will add two additional layers of oversight as regional offices of the NPS get involved as well as a proposed national merit review in the Washington office while the stateside LWCF program has long languished under DOI and NPS oversight.
5. Because the national competitive grant program would likely favor more urban large-scale, high-profile projects, it would be quite difficult, for the State of Montana and its' small local communities to meet the 50/50 matching provisions. With a population of less than one million people and no significant urban areas relative to many other states, Montana does not have the discretionary resources to carry out large scale projects of this type.
6. The top priority needs for LWCF funding in Montana involves recreational infrastructure and facilities. In many cases, this is the refurbishment of LWCF funded projects from inception of the program in the mid-1960's through the 1980's. Numerous recreational facilities (ball fields, swimming pools, public restroom facilities, trails, etc.) in Montana communities are or have reached the end of their useful live. Given the large amount of public land and existing public access to Montana's rivers and waterways, the proposed new competitive grant program would provide limited benefit Montana's citizens or visitors while an existing program gets less than adequate federal support.

Conclusion

Montana strongly favors full funding for the LWCF Program, with the state grants program receiving priority for the appropriations on an equitable basis. The LWCF Act Stateside Program has been and could again be a flagship funding source for the development of conservation and outdoor recreation in Montana. If, however, a competitive national/state grant program moves forward, we recommend it be funded at a much lower amount at the start-up phase, with the funding differential going to the states and territories for continued stateside LWCF program needs.

If you would like to discuss these comments further, please feel free to contact me at (406) 444-3750. Thanks again for the opportunity to provide comments regarding this important national outdoor recreation funding initiative.

Sincerely,



Charles Van Genderen
State Liaison Officer