

New Mexico Coalition of Conservation Districts

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April 5, 2016

Neil Kornze, Director
Bureau of Land Management
1849 C Street NW, Rm. 5665
Washington DC 20240

Attention: OMB Control Number 1004-AE39

Dear Mr. Kornze:

The New Mexico Coalition of Conservation Districts (NMCCD) respectfully requests an extension of the comment period on Proposed Planning Rules for the Bureau of Land Management as noticed in Federal Register Volume 81, No. 37, Thursday 25, 2016. We request that the comment period be a full 180 days, with a deadline no earlier than August 23, 2016.

As the largest land manager in the United States, the Bureau of Land Management (BLM) controls the use of 250 million acres of land, primarily in the western United States where rural counties and communities depend on the use of these lands to support the local economy. In New Mexico, BLM directly controls 17% of the land area, and affects private lands nearby with its management of roads, grazing leases, and the newly designated national monument. Federal lands are critically important to the local economy in several communities, as well as the health, safety, and welfare of the citizens. Given the importance of the federal and BLM holdings in our area, 60 days is not sufficient time for a thorough review of the numerous changes proposed.

The public has had limited opportunity for input into the proposed rules, nor has there been coordination with local governments on the changes. While the Planning 2.0 Public Input Summary Report (2015) notes that over 6,000 comments were received from the public after two webinar listening sessions, only 50 of these comments were original in nature, reaffirming that the public and local governments have not had ample notice or opportunity to weigh in on the rule changes. The comment period should be extended to August 23, 2016 to give adequate time to local governments and the public to review and comment on the major policy changes being proposed in the new planning rules.

The Proposed Planning Rules makes substantive changes to the current rules, specifically limiting the opportunity for local governments to advocate their positions early in the planning process through coordination. This diminishes

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local government's ability to inform the BLM of conflicts between local land use plans and policies and the federal land use plans, as mandated by the Federal Land Policy and Management Act at 43 USC 1712(c)(9). The proposed planning rules will disrupt the current planning process and harm our ability to advocate for and protect the health, safety and welfare of the people, which is our specific statutory charge. (43 CFR 46.15(a)) We request not only that the comment period be extended to August 23, 2016, but that public hearings be held across the western United States to allow for adequate and meaningful input from the local governments and communities which will be impacted by the proposed changes to BLM's planning. At a minimum, BLM should schedule a hearing in each state where BLM manages acreage.

These planning regulations establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects. Because this is an extraordinary circumstance disqualifying the proposed rules to receive a categorical exclusion under NEPA, an Environmental Assessment should be prepared, and an extended public comment period and public meetings granted. (43 CFR 46.215(e))

We appreciate this opportunity to comment on the proposed regulation.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Jose Vanecko". The signature is fluid and cursive, with a large initial "J" and "V".

President

cc: Congressman Steve Pearce, NM
Robert Macgregor, Congressional Aide Congressman Pierce
Leah Baker, Acting Branch Chief Planning and NEPA
Mike Tupper, Acting Asst. Director, Resources and Planning, BLM
Director (630), Bureau of Land Management, USDI