

National Association of Conservation Districts

February 6, 2017

The Honorable Mitch McConnell Majority Leader United States Senate U.S. Capitol Building, Room: S-230 Washington, D.C. 20510 The Honorable Charles Schumer Minority Leader United States Senate Hart Senate Office Building, Room: 419 Washington, D.C. 20510

Dear Majority Leader McConnell and Minority Leader Schumer:

On behalf of the nation's 3,000 conservation districts and the 17,000 men and women who work with millions of cooperating landowners and operators to help them manage and protect land and water resources on private and public lands in the United States, the National Association of Conservation Districts (NACD) urges you to support, S.J. Res. 15 - A joint resolution providing for congressional disapproval under chapter 8 of title 5, United States Code, of the final rule submitted by the Director of the Bureau of Land Management relating to resource management planning.

Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies as well as private sector entities to provide technical, financial and other assistance to help landowners and operators implement conservation practices on the landscape. Because of this mission, NACD has closely followed the development of the BLM's planning rule and submitted comments during the public comment period.

The BLM's initial intent was good: seeking to update a 30-year-old planning process that needs improvement. The end result however often skirts the Federal Lands Policy Management Act and reduces the ability of local government involvement. The removal of local governments opportunity to submit policies and programs when lacking official approved and adopted management plans among other changes add and undue financial burden to continue to participate in the land use planning process as they previously had and at the same time local governments have had to cut their budgets.

With over 3,353 comments submitted and requiring review of the BLM, the final rule seems forced and blind to the many issues raised during the public comment period. A comprehensive, locally led-strategy is the best approach to public-lands management. This rule does not encourage locally led management. The CRA allows for the BLM to go back to the BLM 2.0 drawing board and write a planning rule that truly increases local government involvement as opposed to centralizing the planning process.

Sincerely,

Brent Van Dyke President

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