



National Association of Conservation Districts

October 24, 2008

Director,
Bureau of Land Management
1620 L Street, NW Room 401
Washington, DC 20036
Attn: RIN 1004-AE05

Proposed Rule Land Withdrawals; Removal of Regulations Covering Emergency Withdrawals

On behalf of the nation's 3,000 conservation districts, the National Association of Conservation Districts (NACD) submits the following comment in response to the Bureau of Land Management proposed removal of regulations that provide for emergency withdrawals.

NACD supports the proposed removal of the redundant emergency withdrawal regulations in favor of the conventional withdrawal regulations already in place. The emergency withdrawal regulations do not provide for public comment (43 CFR 2310.5). This is a serious shortcoming of the regulation being proposed for removal. NACD has long-standing policy favoring those regulations that welcome public input. Since the conventional processes already in place not only provide for the immediate protection of natural resources on public lands affected by emergency by segregation of the affected lands, but also provide for at least 90 day public comment period on the requested action [43 CFR 2310.3-1(b)(2)(iv)], the emergency withdrawal regulations should be removed.

The Proposed Rule is appropriate and should be adopted by quick issuance of a Final Rule implementing the proposal.

Sincerely,

A handwritten signature in black ink that reads 'John H. Redding'. The signature is written in a cursive style with a large, sweeping 'J'.

John Redding
President