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MAKE GOVERNMENT GOOD AGAIN

Coordination is a process that requires federal agencies to resolve conflicts and reach consistency with State and local government plans and policies. This direction is found in many of our nation's federal laws as well as many state laws. It recognizes that the responsibilities of State and local governments are "equal, not subordinate" to the duties of federal agencies, and that the needs of the State and local governments must be incorporated into the federal planning processes.

Coordination is simply good governance and the embodiment of "local control." The government-to-government process infuses federal decision making with the institutional knowledge of local experts. It takes the handcuffs off local governments to help ensure federal agency actions are meaningful, productive and effective at ensuring robust local economies as well as good stewardship of our nation's resources.

Coordination helps to ensure that political agendas are held in check by common sense practicalities, that administrative agencies are held accountable, and that the opinions of the people who visit and recreate on the federal lands do not override those of the people who live there.

While Coordination has been used successfully to stop programs that would harm the local community, it has also provided the pathway for resolving conflicts with federal and state agencies over the productive use of federal lands and proper stewardship of these lands. It is being used to increase grazing, timber, oil and gas production in the federal land states. It can and should be used as a tool to ensure the development of more efficient and effective plans for all branches of government in every state.

Although Congress has directed federal agencies to coordinate with States, local governments and tribes in several statutes, the federal agencies have failed to initiate the process, or have tried to replace it with "collaboration" or "cooperation," two preferred planning processes of the agencies. Successful coordination has been accomplished from the ground up, with State and local governments insisting the law be followed.

Contents:

Good Governance	2
Definition & Criteria	2
Coordination & Consistency	3
Existing Provisions	8
Comparing Coordination	9
Coordination Meetings	10
American Stewards of Liberty	12



GOOD GOVERNANCE

Coordination between federal agencies and State and local governments is necessary to ensure consistent policies between the governing jurisdictions.

Federal agencies are tasked with specific responsibilities. For example, the federal land management agencies of the United States Forest Service and the Bureau of Land Management are required to manage the federal lands and their multiple uses.

Local Governments, such as Counties, however, are tasked with a much different responsibility: to protect the health, safety and welfare of the people. They are given broad authority to ensure this end, including planning responsibilities, police powers, and taxing authority for all the land within their

political jurisdiction. This includes the federal and state lands.

When federal law requires the Bureau of Land Management to coordinate its "inventory, planning, and management activities" with local governments, for example, it is obligating the agency to ensure its management of the habitat does not inhibit the local governments' ability to protect the health, safety and welfare of the people.

As a practical matter, it makes good sense for the two necessary and distinct governing bodies to negotiate early in planning process for the purpose of resolving conflicts and achieving consistency between plans and goals. It is simply good governance.

DEFINITION & CRITERIA

The Federal Land Policy and Management Act (FLPMA) passed in 1976, defines the minimum requirements for "coordination" by specifying exactly how the federal agency should negotiate with local government. (43 USC § 1712) These are:

- 1. Keep apprised of State, local and tribal land use plans;
- Assure that consideration is given to local plans when developing a federal plan, policy or management action;
- 3. Provide early notification (prior to public notice) to local governments of development of any plan, policy or action;
- Provide opportunity for meaningful input by local governments into development of the plan, policy or action; and
- Make all practical effort to resolve conflicts between federal and local policy and reach consistency.

The common dictionary definition of "coordinate" shows that a person or party operating in "coordinate" fashion is operating as a party "of equal importance, rank or degree, not subordinate." (Webster's New International Dictionary)



COORDINATION & PLAN CONSISTENCY REVIEW

Analysis of the Federal Land Management and Policy Act, Section 202(c)(9) Coordination Provision

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The Federal Land Policy and Management Act (FLPMA), 43 U.S.C. §§ 1701-1787 requires that the Interior Secretary "manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 1712 of this title when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law." 43 U.S.C. § 1732(a). The requirements for the development of land use plans are set forth in FLPMA Section 202, 43 U.S.C. § 1712. Subsection (c)(9) of this section imposes coordination and consistency requirements on the Interior Secretary. Specifically, this provision states:

(9) to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and of the States and local governments within which the lands are located, . . . and of or for Indian tribes by, among other things, considering the policies of approved State and tribal land resource management programs. In implementing this directive, the Secretary shall, [1] to the extent he finds practical, keep apprised of State, local, and tribal land use plans; [2] assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands; [3] assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and [4] shall provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. Such officials in each State are authorized to furnish advice to the Secretary with respect to the development and revision of land use plans, land use guidelines, land use rules, and land use regulations for the public lands within such State and with respect to such other land use matters as may be referred to them by him. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.

43 U.S.C. § 1712(c)(9) (reference to "statewide outdoor recreation plans" removed; numbering added for reference purposes).

This provision is based on settled law recognizing that the States and local governments are "free to enforce [their] criminal and civil laws on federal land so long as those laws do not conflict with federal law." California Coastal Comm'n v. Granite Rock Co., 480 U.S. 572 (1987) (quoting Kleppe v. New Mexico, 426 U.S. 529, 543 (1976)); see also People ex rel. Deukmejian v. Cty. of Mendocino, 36 Cal. 3d 476, 491, 683 P.2d 1150, 1160 (1984) (holding that county regulation of aerial spraying of pesticides was not preempted by federal law). Even though the public lands are owned by the United States, States and local governments have the authority to plan for and regulate activities occurring on the public lands, unless such regulation is preempted by a federal law. FLPMA Section 202(c)(9) explicitly recognizes and protects that authority.

FLPMA Section 202(c)(9) also is based on the recommendations of the Public Land Law Review Commission. In its seminal report to the President and to the Congress, *One Third of the Nation's Land*, which provided the underpinning for much of FLPMA, the Commission explained that State and local units of government "represent the people and institutions most directly affected by Federal programs growing out of land use planning." *One Third of the Nation's Land* 61 (1970). The Commission felt so strongly about the need to involve State and local governments in the planning and management of the public lands that it recommended the following:

To encourage state and local government involvement in the planning process in a meaningful way, as well as to avoid conflict and assure the cooperation necessary to effective regional and local planning, the Commission believes that consideration of state and local impacts should be mandatory. To accomplish this, Federal agencies should be required to submit their plans to state or local government agencies. . . .

The coordination [between federal agencies and State and local governments] which will be required if the Commission's recommendations are adopted is so essential to effective public land use planning that it should be mandatory. . . . The Commission recommends, therefore, that Congress provide by statute that Federal action programs may be invalidated by court orders upon adequate proof that procedural requirements for planning coordination have not been observed.

Id. at 63 (italics in original).

The report of the House Interior and Insular Affairs Committee accompanying the House bill (which provided much of the text of FLPMA) similarly stated:

The underlying mission for the public lands is the multiple use of resources on a sustained-yield basis. Corollary to this is the selective transfer of public lands to other ownership where the public interest will be served thereby. The proper multiple use mix of retained public lands is to be achieved by comprehensive land use planning, coordinated with State and local planning.

H.R. Rep. No. 94-1163, at 2 (1976), reprinted in 1976 U.S.C.C.A.N. 6175, 6176 (emphasis added).

On its face, FLPMA Section 202(c)(9) imposes a number of different and overlapping requirements and obligations on the Interior Secretary and, therefore, on the Bureau of Land Management (BLM) with respect to coordinating with State and local governments and maintaining consistency with the land use plans, programs and policies of State and local governments. These requirements are discussed below.

1. 43 U.S.C. § 1712(c)(9) (first sentence)—Duty to Coordinate.

First, the BLM must "coordinate" the agency's "land use inventory, planning, and management activities" with "the land use planning and management programs of the States and local governments within which the lands are located." 43 U.S.C. § 1712(c)(9) (first sentence). In coordinating, the BLM must consider the "policies of approved State and tribal land resource management programs." *Id.* The verb "coordinate" means "to put in the same order or rank" or, alternatively, "to bring into common action, movement, or condition: HARMONIZE." Merriam-Webster's Collegiate Dictionary 255 (10th ed. 2000). In other words, the requirement to "coordinate" requires that the BLM treat the land use planning and management activities of State and local governments as equal in rank and *harmonize* the BLM's land use inventory, planning, and management activities with the activities of State and local governments "to the extent consistent with the laws governing the administration of the public lands."

The plain language of FLPMA Section 202(c)(9) indicates that the requirement to coordinate is significantly broader than simply coordinating BLM and local land use plans. Instead, coordination should occur with respect to all BLM "land use inventory, planning, and management activities" and all State and local government "land use planning and management programs." *Id.* Thus, coordination is required, for example, in connection with assessing the resource, environmental, ecological, social, and economic conditions prior to developing land use plans and other land planning and management guidance; developing and identifying the policies, guidance, strategies and plans for consideration in developing land use plans; formulating land use and resource management alternatives; and developing management measures that are used to implement land use plans following their adoption.

As noted, BLM inventory, planning, and management activities do not have to be coordinated with State and local governments if doing so is inconsistent with "the laws governing the administration of the public lands." Id. (emphasis added). Thus, on its face, this limitation applies when a federal law governing public land management, such as FLPMA, conflicts with a State or local government land use planning and management program. Federal laws that do not address the "administration of the public lands" are irrelevant to this limitation, however. Likewise, agency regulations, directives, policies, and guidance documents are irrelevant because they are not laws. Consequently, the existence of Secretarial orders, regulations, policies, directives, and similar agency guidance documents do not limit the BLM's obligation to coordinate, with the objective of resolving inconsistencies. Likewise, the existence of Secretarial and agency policies and directives do not serve as a basis to avoid ensuring consistency.

Finally, agency regulations, directives, policies, and guidance documents, such as BLM rules governing land and resource planning and management, Secretarial orders and directives, the BLM Land Use Planning Handbook, the Interior Departmental Manual, and the Interior Department's Climate Change Adaptation Plan and Landscape-scale Mitigation Program, are themselves subject to coordination under FLPMA Section 202(c)(9) to the extent such documents provide substantive direction for land use planning and management.

2. 43 U.S.C. § 1712(c)(9) (second sentence)—Implementation Requirements.

Second, "in implementing this directive," i.e., the requirement to coordinate, the BLM must do four things:

- 1. "to the extent [the Secretary] finds practical, keep apprised of State, local, and tribal land use plans;"
- 2. "assure that consideration is given to those State, local, and tribal plans that are germane in the development of land use plans for public lands;"
- 3. "assist in resolving, to the extent practical, inconsistencies between Federal and non-Federal Government plans, and"
- 4. "provide for meaningful public involvement of State and local government officials, both elected and appointed, in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands."

43 U.S.C. § 1712(c)(9) (second sentence).

The first and third requirements are qualified by the phrase "to the extent [the Secretary] finds practical." The word "practical" has several meanings, but the one that makes sense in this context is "capable of being put to use or account: USEFUL." Merriam-Webster's Collegiate Dictionary 912 (10th ed.). In most cases, it will be useful to the BLM to perform requirements I and 3 because each requirement must be satisfied to properly complete the coordination process. Moreover, the performance of each requirement is necessary for the BLM to fulfill its obligation to ensure that BLM land use plans are "consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act," which appears in the final sentence of FLPMA Section 202(c)(9).

Requirement 2—giving consideration to State, local, and tribal plans that are germane in the development of land use plans for public lands—logically follows from the basic obligation to coordinate as well as the consistency requirement in the final sentence of FLPMA Section 202(c)(9). Obviously, meaningful coordination requires that the BLM carefully consider State and local land use plans that pertain to public land uses or that may be impaired by a BLM land use plan containing conflicting resource use designations or implementation strategies. Consequently, this requirement is not subject to any limitation.

Additionally, Requirement 4—requiring that the BLM provide "meaningful public involvement" for State and local government officials "in the development of land use programs, land use regulations, and land use decisions for public lands"—is not qualified by the phrase "to the extent he finds practical." Requirement 4 also applies broadly to a range of BLM actions that affect the planning and management of public lands. Thus, State and local governments must be provided "meaningful public involvement . . . in the development of land use programs, land use regulations, and land use decisions for public lands." 43 U.S.C. § 1712(c)(9) (second sentence). Again, this includes agency directives, policies, and guidance documents (e.g., Interior Department and BLM handbooks and manuals), which, as discussed above, also are subject to coordination. Coordination must take place before these documents are used in connection with land use planning and management, including the development of land use plans.

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3. 43 U.S.C. § 1712(c)(9) (third sentence)—Advice to the Secretary.

The next sentence of FLPMA Section 202(c)(9) specifically authorizes "such officials," i.e., "State and local government officials, both elected and appointed," to advise the Interior Secretary (and BLM as the Secretary's delegated authority) on the "development and revision of land use plans, land use guidelines, land use rules, and land use regulations for the public lands within such State." This sentence requires government-to-government coordination between State and local officials and the Secretary (or the BLM Director) on land use plans, guidelines, and regulations affecting the management and use of the public lands, thereby ensuring that the concerns and recommendations of State and local governments are recognized and addressed. This process allows the BLM to coordinate its own planning and management activities and maintain consistency with State and local governments to the greatest extent possible, including the BLM's development of rules, policies, and guidelines that apply when land use plans are developed and implemented.

4. 43 U.S.C. § 1712(c)(9) (fourth sentence)—Consistency with State and Local Plans.

The fourth and concluding sentence of FLPMA Section 202(c)(9) is extremely important. This sentence mandates that BLM land use plans "be consistent with State and local plans to the maximum extent [the Secretary] finds consistent with Federal law and the purposes of this Act" (emphasis added). This obligation is called the "consistency requirement" and is intended to ensure that BLM and local land use plans are consistent, unless a federal law or the purposes of FLPMA itself conflict with and, therefore, preempt the provision in the local land use plan.

The consistency requirement is related to and follows logically from the three previous sentences of this provision. As discussed, the BLM must coordinate its land use inventory, planning, and management activities with State and local governments and consider "the policies of approved State and tribal land resource management programs" (first sentence); keep apprised of State and local land use plans, assure that these plans are considered in the development of land use plans for public lands, and affirmatively assist in resolving inconsistencies between "Federal and non-Federal Government plans" to the extent practical (second sentence); and receive advice from State and local governments on "the development and revision of land use plans."

Based on this coordination, the BLM must identify and consider potential conflicts with State and local government planning documents, and ensure that these conflicts are avoided or resolved during the planning process to the maximum extent practical. This means that coordination should begin early in the land planning process so that potential conflicts and inconsistencies can be immediately identified and taken into account as the land use plan is developed. This ensures that consistency with State and local planning is maintained or, at worst, conflicts are minimized through coordination.



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OTHER EXISTING COORDINATION PROVISIONS

National Forest Management Act

16 U.S.C § 1604—National Forest System land and resource management plans

(a) Development, maintenance, and revision by Secretary of Agriculture as part of program; coordination

As a part of the Program provided for by section 1602 of this title, the Secretary of Agriculture shall develop, maintain, and, as appropriate, revise land and resource management plans for units of the National Forest System, coordinated with the land and resource management planning processes of State and local governments and other Federal agencies.

National Environmental Policy Act

42 U.S.C. § 4331—Congressional declaration of national environmental policy

- (a) The Congress, recognizing the profound impact of man's activity on the interrelations of all components of the natural environment, particularly the profound influences of population growth, high-density urbanization, industrial expansion, resource exploitation, and new and expanding technological advances and recognizing further the critical importance of restoring and maintaining environmental quality to the overall welfare and development of man, declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures, including financial and technical assistance, in a manner calculated to foster and promote the general welfare, to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans.
- (b) In order to carry out the policy set forth in this chapter, it is the continuing responsibility of the Federal

 Government to use all practicable means, consistent with other essential considerations of national policy, to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may ...

Homeland Security Act

6 U.S.C § 102 - Secretary; Functions

- (c) Coordination with Non-Federal Entities
 - With respect to homeland security, the Secretary shall coordinate through the Office of State and Local Coordination (established under section 361 of this title) (including the provision of training and equipment) with State and local government personnel, agencies, and authorities, with the private sector, and with other entities, including by—
 - (1) coordinating with State and local government personnel, agencies, and authorities, and with the private sector, to ensure adequate planning, equipment, training, and exercise activities;
 - (2) coordinating and, as appropriate, consolidating, the Federal Government's communications and systems of communications relating to homeland security with State and local government personnel, agencies, and authorities, the private sector, other entities, and the public; and
 - (3) distributing or, as appropriate, coordinating the distribution of, warnings and information to State and local government personnel, agencies, and authorities and to the public.
 - (4) develop a process for receiving meaningful input from State and local government to assist the development of the national strategy for combating terrorism and other homeland security activities.

Homeland Security Act, continued...

6 U.S.C § 801 − Office for State and Local Government Coordination

(a) Establishment

There is established within the Office of the Secretary the Office for State and Local Government Coordination, to oversee and coordinate departmental programs for and relationships with State and local governments.

(b) Responsibilities

The Office established under subsection (a) of this section shall—

- (I) coordinate the activities of the Department relating to State and local government;
- (2) assess, and advocate for, the resources needed by State and local government to implement the national strategy for combating terrorism;
- (3) provide State and local government with regular information, research, and technical support to assist local efforts at securing the homeland; and
- (4) develop a process for receiving meaningful input from State and local government to assist the development of the national strategy for combating terrorism and other homeland security activities.

FEDERAL TRAVEL MANAGEMENT REGULATIONS

36 C.F.R. § 212.53—Travel Management Plans, United States Forest Service

Coordination with Federal, State, county, and other local governmental entities and tribal governments.

The responsible official shall coordinate with appropriate Federal, State, county, and other local governmental entities and tribal governments when designating National Forest System roads, National Forest System trails, and areas on National Forest System lands pursuant to this subpart.

TEXAS STATE COORDINATION PROVISION

Texas Government Code, Section 391.009(c)

In carrying out their planning and program development responsibilities, state agencies shall, to the greatest extent feasible, coordinate planning with commissions to ensure effective and orderly implementation of state programs at the regional level.

This list of federal laws and regulations provides some of the major laws requiring coordination, however, it is not an exhaustive list.



COMPARING COORDINATION WITH OTHER PROCESSES

Federal Agencies have several processes available that they can use when preparing land use plans to ensure the involvement of States, local governments, tribes, other agencies and the public. These include "Collaboration, Cooperation, and Coordination."

Collaboration: Designed to involve the Public in the planning process

Cooperation: Designed to incorporate other state and federal Agency expertise

Coordination: Designed to resolve conflicts with State and Local Governments

Collaboration - A Process for Public Involvement

"Collaboration" is an appropriate forum for the public to advocate their position. The collaboration process allows various stakeholders and interest groups to meet together and come to a consensus on planning issues. Each stakeholder has an equal say in the process. This means that a non-profit advocacy group's position is equal with local governments, even though the government entity has state delegated planning authority and responsibilities.

While local governments may want to participate in the collaborative process, they should do so only with the understanding that the final plan must be coordinated with them to ensure it is consistent with the local plans and policies.

Cooperation - A Process for Agency Expertise

The cooperative agency process was created so that federal and state agencies could share expertise in the development of Environmental Impact Statements. During the cooperative agency process, meetings are held behind closed doors and the discussions and documents prepared are held confidential. The very nature of the cooperative process makes it impossible for the body of a local government to participate, deliberate and negotiate policies with the federal agencies to achieve consistency. Doing so in this fashion would force them to violate state open meeting laws.

The Cooperative process was not designed to reach consistency, but was designed to allow interagency participation in the drafting of Environmental Impact Statements under the National Environmental Policy Act. The Cooperative process is a closed forum to the public. While local government representatives can participate in these meetings, the full governing board cannot, and therefore, cannot participate in good faith negotiations to reach consistency. When agencies insist that local governments coordinate in the cooperative process, they are asking them to violate state open meeting laws.

Coordination - A Process for Local Government Consistency

The coordination process is an open, public process that complies with each state's open meeting laws. It allows the governing board of local government entities to discuss and make decisions regarding various issues, projects and policies that are inter-related to federal projects. In this government-to-government forum, elected officials can conduct in-depth discussions regarding the various issues impacting the local community, and expect reasonable answers. Because the agencies have a duty to resolve conflicts and reach consistency with the local position, it is also the only process that can prevent the federal agencies from rejecting the local position.

Coordination is a process far stronger than collaboration or cooperation. It requires federal agencies to come to the negotiation table on an equal basis with local governments, and use good faith in trying to resolve conflicts between local and federal policies and plans.

THE COORDINATION MEETING PROCESS

- ⇒ Open Public Meetings: Discussion is government-to-government, without public participation. However, the discussions are open to the public so they can be fully apprised of the issues and positions of each government entity. This helps members of the public be better informed when submitting public comments.
- ⇒ Follows Published Agenda: Normally the Local Government proposes a draft agenda for the federal agency to review and add to prior to its publication.
- ⇒ Permanent Record Retained: A transcript and/or minutes are kept of the discussion and decision
- ⇒ Chaired by the Local Government.

HOW COORDINATION WORKS FOR PLANNING ISSUES:

(Example: Development of a Land Use Plan or Resource Management Plan on Federal Lands)

Beginning

- Coordination initiated at the beginning with face-to-face coordination meetings to discuss:
 - Local Government plans, policies and programs
 - Possible conflicts
 - Needs and goals of the Local Government

During

- Conflicts between plans identified, solutions discussed
- Face-to-face meetings continue for all major decision points
- The Local Governments position on alternatives included as apPart of the plan analysis provided to the public for comment.

Final

- Local Government reviews final plan prior to public release and notifies agency of inconsistencies.
- Consistency must be met by the Federal Agency, or explanation provided as to how the local governments position fails to comply with federal law.

HOW COORDINATION WORKS FOR AN INVENTORY PROCESS

(Example: Inventory for Lands with Wilderness Characteristics and Areas of Environmental Concern.)

Beginning

- Coordination initiated at the beginning of process with face-to-face coordination meetings to discuss:
- Local Government plans, policies and programs
- Possible Conflicts
- Needs and goals of the Local Government
- Inventory gathering process determined

During

- Agencies inventory decisions shared with Local Government at least 120 days prior to public comment process.
- Conflicts with local plans identified and resolved
- Face-to-face meetings continue with open discussions for all major decision points

Final

- Local government provides agency with written determination of those designations that comply and conflict with local plans, policies and programs.
- Special designations that conflict should be removed, or explanation provided as to why the agency cannot be consistent with the local determination.



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Protecting People and Property



ABOUT AMERICAN STEWARDS OF LIBERTY

American Stewards of Liberty (ASL) is a 501(c)(3) non-profit organization dedicated to protecting private property rights, defending the productive use of land, and restoring local control. Founded in 1992, ASL works directly with local communities to help protect the continued use of natural resources – the production of food, fiber and energy and access to the land – in the face of an increasing influence of the radical environmental agenda that is working to remove people from the landscape.

Three primary projects being pursued at ASL today are:

- 1. Local Government Coordination: ASL works with local leaders, training them on how to implement a coordination process with federal agencies for the purpose of advocating the local position and resolving conflicts with the federal planning position.
- 2. Delisting Species: ASL works with a team of experts to delist species currently on the Endangered Species List that have been listed in error or have been recovered and no longer warrant federal protection.
- 3. Coordination Coalition: ASL has organized a coalition of Local Governments that use coordination to work with federal and state agencies. As a part of this effort, the group filed substantive comments on BLM's new planning rules and filed the first case challenging these rules, Kane County, Utah, et. al. vs. Department of Interior.

MEMBERSHIP

Join our membership to help support our work and to stay connected to a community of Americans resolved to increase the productive use of our land. Log onto our website, www.americanstewards.us, and click on the donate button to join.

COORDINATION RESOURCES

Visit our website to learn more about the coordination process and how to get this started in your community. ASL conducts on-site training courses for local governments and can help develop a strategy for your issues as well as help facilitate the coordination process. Our objective is to show you that your local governments can successfully implement coordination and generate positive results. Go to the Coordination Training and Outreach pages on our website for more information.