



November 25, 2019

Mallery Manzanares  
New Mexico Department of Transportation  
P.O. Box 1149  
Santa Fe, New Mexico 87504

**Subject: Written Comments for Proposed New Rule, 18.27.6 NMAC**

The Pueblo of Jemez (Pueblo) formally enters its comment in reference to the Proposed New Rule, 18.27.6 NMAC.

1. Section 18.27.6.11 Application Procedures, Review, and Evaluation Process; Item G, states, *“If the local government fails to execute and return the grant agreement within thirty (30) days of receiving the notice of award, the project shall be considered lapsed and may be submitted to the commission for re-programming.”*

**Comment:** The Pueblo proposes a 60-day turnaround time for signing and returning a Local Government Transportation Project Fund (LGTPF) grant agreement, to allow Local Governments to perform a thorough review of their grant agreement and to execute the resolution that is required as an exhibit to LGTPF grant agreements. The Pueblo’s administration has a rigorous review process for grant agreements, which could take a couple of weeks.

In addition, a LGTPF grant agreement requires the execution of a resolution to accompany the grant agreement as an exhibit. The proposed 30-day turnaround time to review and sign the agreement, and execute a Tribal Council Resolution could be very challenging for Tribal applicants. The schedule for Tribal Council meetings varies from month to month. For example, if a Tribe received an award letter and grant agreement shortly after a Tribal Council meeting was just held, there is a good chance that the window of opportunity to present a Resolution within the 30-day timeframe the would be missed because Tribal Council may not be scheduled to meet within the 30-day timeframe.

The Pueblo appreciates the NMDOT’s consideration of our proposal to increase the turnaround time for returning LGTPF grant agreements.

---

***Office of the Governor***

4471 Highway 4, P.O. Box 100 • Jemez Pueblo • New Mexico • 87024  
(575) 834-7359 • Fax (575) 834-7331