



March 29, 2016

Mr. Neil Kornze  
Director, Bureau of Land Management  
U.S. Department of the Interior  
1849 C St. NW, Room 5665  
Washington, D.C. 20240

**RE: Formal Time Extension Request for “CFR Part 1600 Resource Management Planning; Proposed Rules” Notice Federal Register February 25, 2016 81 FR 9674**

Dear Director Kornze:

The Rural County Representatives of California (RCRC) is an association of thirty-five California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties are tasked with a variety of decision-making responsibilities related to land use and development in rural California communities and are challenged with environmental stewardship, economic vitality, and social equity at the local level. RCRC welcomes this opportunity to provide comment on the Bureau of Land Management’s (BLM) proposed “Planning 2.0” regulations.

The BLM manages 15.2 million acres of land and mineral resources in California, which is nearly 15 percent of California’s total land mass. As such, the proposed “Planning 2.0” rule will have a significant impact on how the BLM plans for and manages lands within the boundaries of RCRC member counties. As co-regulators and intergovernmental partners in the BLM’s mission, counties have a significant interest in providing BLM with the most meaningful information and analysis possible to help craft BLM regulations, especially relating to the significant role local governments and locally generated information should play in guiding the planning process.

Given the potentially significant impact of this regulation and the volume of information involved, as well as the staffing and budgetary realities facing California’s rural counties, RCRC is concerned that the current comment period closing April 25, 2016 does not provide adequate time for counties to respond to the BLM on this important issue. California’s rural counties are also in the midst of dealing with other significant resource challenges such as wildfire cleanup and mitigation and, most

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immediately, the urgent tree die-off as a result of pest infestation due to recent severe drought conditions.

Our goal in this effort is to ensure local government involvement is at the forefront of the BLM's resource management planning and that local governments have the time necessary to analyze the implications of the substantive regulatory changes presented in the Planning 2.0 rule. Likewise, counties wish to offer suggested changes to the proposed regulation to help the BLM mitigate any unintended consequences or challenges posed by the proposed rule, some of which are foreseeable from a local government perspective.

In light of these concerns, RCRC respectfully requests an extension of the public comment period for this proposed regulation of at least one-hundred and eighty (180) days so that those counties with limited resources have adequate time to review the proposal and engage with the BLM in this regulatory process.

If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON  
Regulatory Affairs Advocate

cc: RCRC Board of Directors