



March 21, 2016

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 National Association of Counties (NACo), the only national organization representing all of America’s 3,069 counties, appreciates the opportunity to provide comments on the Bureau of Land Management’s (BLM) proposed “Planning 2.0” regulations. The proposed “Planning 2.0” initiative will have a significant impact on how the BLM plans for and manages its 245 million acres of public lands and 700 million acres of subsurface minerals for years to come. 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.

Counties across the nation have a significant interest in commenting on the BLM’s proposed Planning 2.0 rule. Given the potentially significant impact of this regulation and the volume of information involved, as well as the staffing and budgetary realities facing many of America’s counties, we are 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. 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, NACo 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.

Should you have any questions, please do not hesitate to contact NACo Associate Legislative Director Chris Marklund at cmarklund@naco.org or 202.942.4207.

On behalf of America's 3,069 counties, we greatly appreciate your consideration of our request.

Respectfully,

A handwritten signature in black ink that reads "Matthew D. Chase". The signature is written in a cursive style with a large, prominent loop at the beginning of the word "Matthew".

Matthew D. Chase
Executive Director
National Association of Counties