

MARIPOSA COUNTY

Board of Supervisors · (209) 966-3222



RESOLUTION - ACTION REQUESTED 2016-142

MEETING: April 5, 2016

TO: The Board of Supervisors

FROM: John Carrier, District V Supervisor

RE: Bureau of Land Management Planning 2.0 Comment Extension

RECOMMENDATION AND JUSTIFICATION:

Approve a Letter Requesting an Extension on the Comment Period on the Bureau of Land Management's (BLM) Resource Management Planning Proposed Rule (Planning 2.0); and Authorize the Board of Supervisors Chair to Sign the Letter. The proposed rule seeks to amend existing regulations relating to land use planning and opportunities for public engagement in the BLM's planning process. Of concern is that the current comment period, which closes on April 25, 2016, does not provide adequate time for counties to respond to the BLM on the potential impacts of the proposed rule, especially for those counties with limited budgetary and staffing resources. Because the Planning 2.0 rule will impact 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, the proposed rule could impact counties across the United States.

It is critical to ensure local government involvement is at the forefront of BLM 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. 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 and land-use plans. Extending the comment period will help ensure local governments and locally generated information continues to play a significant role in BLM land-use planning in the years to come.

Both the National Association of Counties (NACo) and the California State Association of Counties (CSAC) are urging BLM to extend the comment period by 180-days.

BACKGROUND AND HISTORY OF BOARD ACTIONS:

The Board has approved letters that have a positive impact on the citizens of Mariposa County.

ALTERNATIVES AND CONSEQUENCES OF NEGATIVE ACTION:

Do not approve the letter. Individual Board members may write their own letters requesting an extension in the comment period, which may not carry the same weight of a letter endorsed by the entire Board.

ATTACHMENTS:

BLM Planning 2.0 _ comment period extension request (DOCX)

CAO RECOMMENDATION

Requested Action Recommended


Mary Hodson, CAO

3/29/2016

RESULT: ADOPTED BY CONSENT VOTE [UNANIMOUS]

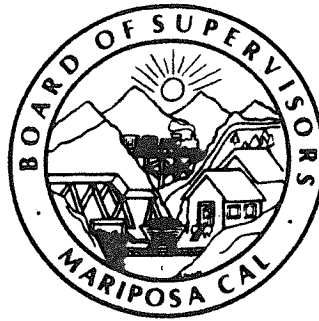
MOVER: Marshall Long, District III Supervisor

SECONDER: Merlin Jones, District II Supervisor

AYES: Smallcombe, Jones, Long, Cann, Carrier

Mariposa County Board of Supervisors

District 1 ... ROSEMARIE SMALLCOMBE
District 2 MERLIN JONES
District 3 MARSHALL LONG
District 4 KEVIN CANN
District 5 JOHN CARRIER



MARY HODSON
County Administrative Officer

RENE LAROCHE
Clerk of the Board

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April 5, 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 Mariposa County Board of Supervisors appreciates the opportunity to provide comments on the Bureau of Land Management's (BLM) proposed "Planning 2.0" regulations. The BLM manages slightly over 72,500 acres of land and mineral resources in Mariposa County and the proposed "Planning 2.0" rule will have a significant impact on how the BLM plans for and manages our local lands and the 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 small rural county is currently dealing with a number of pressing issues that are utilizing staff time and effort – the Tree Mortality Emergency, on-going drought and water issues, and a myriad of land use matters including updates to the County's General Plan.

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, Mariposa County 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, appearing to read "John Carrier", written in a cursive style.

JOHN CARRIER
Chairman

cc: National Association of Counties
California State Association of Counties
Rural County Representatives of California

Instructions for Submitting Public Comments

Deadline: The comment period is set to close on April 25, 2016. In order to ensure an extension, it is important you request an extension of the comment period as soon as possible.

You may submit comments by any of the following methods:

- **Mail:** Please Address the letter to:

Director (630), Bureau of Land Management
U.S. Department of the Interior
1849 C Street NW, Room 2134LM
Washington, DC 20240

Attention: 1004-AE39.

- **Personal or messenger delivery:** Hand Deliver to:

U.S. Department of the Interior
Bureau of Land Management
20 M Street SE.
Room 2134LM
Attention: Regulatory Affairs
Washington, DC 20003

- **Online:** Via the Federal eRulemaking Portal at <http://www.regulations.gov/>. Search for BLM-2016-0002-0001 and follow the instructions on the web site.

- **Fax:** Submit via fax to: 202-395- 5806;

Attention: Office of Management and Budget, Office of Information and Regulatory Affairs, Desk Officer for the Department of the Interior,
Attention: OMB Control Number 1004-XXXX

- **Email:** Submit via email to: oir_submission@omb.eop.gov

Indicate in the subject line: "Attention: OMB Control Number 1004-XXXX,"

Additional Resources

- A copy of NACo's comment extension request letter is available [here](#).
- The BLM's Planning 2.0 website is available [here](#).
- The Proposed Rule is available [here](#).