



BOARD OF SUPERVISORS COUNTY OF INYO

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December 11, 2012

Inyo National Forest
Attn.: Ed Armenta
351 Pacu Lane, Suite 200
Bishop, CA 93514

Re: Inyo National Forest Plan Update/Revision – Draft Collaboration and Communication Plan

Mr. Armenta:

On behalf of the Inyo County Board of Supervisors, thank you for including us in the update effort for the Inyo National Forest Plan. We are pleased to provide input regarding the draft Collaboration and Communication (C&C) Plan that has been prepared to guide the planning process.

We are generally supportive of the draft C&C Plan, but we note that the document avoids using the term coordination. As you are aware, we strongly believe that coordination between the County and Forest Service is necessary for a successful planning process. We believe that coordination with the County in particular is an important component of the recently adopted National Forest Planning Rule, and should be referenced comprehensively throughout the C&C Plan. While in general we believe that the C&C Plan incorporates important components of coordination, it seems to purposely work to avoid the concept of working together to solve issues proactively, and instead focuses on information exchange.

According to the Inyo County General Plan Government Element, coordination is defined as

A planning process by which the County and another public agency seek to harmonize the proposed public agency's action with County land use plans, especially the County's General Plan, with the goal of identifying conflicts between the County's and the public agency's land use plans and developing alternatives that are consistent with plans of both the County and the other public agency. The County has sole jurisdiction to interpret consistency and/or inconsistency between the other public agency's plans and the County's General Plan or other County plans. Representatives of the County and the other public agency meet to obtain and exchange information and to obtain consistency between the land use plans of the County and the other public agency to the extent practical.

We strongly believe that these concepts and the direction provided in the Planning Rule regarding coordination should be incorporated into the C&C Plan. The C&C Plan should specifically recognize the goal of obtaining information about local government plans with the goal of achieving consistency between those and the Forest plan.

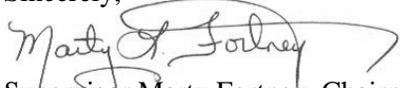
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On page 16 of the C&C Plan, reference is made to possibly undertaking out-of-area workshops. Local residents should be able to participate in these workshops. Therefore, please include a remote participation component for local residents in any out-of-area workshops.

We should also note an apparent misunderstanding of the role of Los Angeles Department of Water and Power (LADWP) in Inyo County. Section B(2) refers to "local agencies such as LA Department of Water and Power that share legal responsibility for managing forest, land, wildlife, air, water, and other resources that are part of Inyo National Forest." Inyo County has general responsibility within the County for environmental compliance and protection, both on LADWP land and Forest land. LADWP does not have governmental authority within Inyo County. This statement might be correct in Los Angeles, but not three hundred miles away.

Thank you. If you have any questions, please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292 or kcarunchio@inyocounty.us.

Sincerely,



Supervisor Marty Fortney, Chairperson
Inyo County Board of Supervisors

cc: Board of Supervisors
Kevin Carunchio, CAO
Randy Keller, County Counsel
Joshua Hart, Planning Director
Doug Wilson, Willdan
Randy Moore, INF
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