



AGENDA REQUEST FORM
BOARD OF SUPERVISORS
COUNTY OF INYO

For Clerk's Use Only:
AGENDA NUMBER

- Consent Departmental Correspondence Action Public Hearing
 Scheduled Time for Closed Session Informational

FROM: Inyo County Planning Department

FOR THE BOARD MEETING OF: January 28, 2014

SUBJECT: Inyo National Forest Plan Update/Revision

RECOMMENDATION: Receive a presentation from staff about coordination with Forest Service staff regarding the Inyo National Forest Plan Update/Revision and provide input; review draft correspondence to the Forest Service regarding the Preliminary Need for Change, provide input, and authorize the Chair to sign, and; discuss potential attendance at the upcoming public meeting for the Preliminary Need for Change on January 30, 2014.

SUMMARY DISCUSSION: The Inyo National Forest (INF) is working on updating its Forest Plan.¹ Staff is working with Forest Service staff in developing the Plan, and will report on recent activities. Input from the Board is requested to guide staff in future coordination efforts with Forest Service staff.

The Preliminary Need for Change document has been released for public review (refer to Attachment 1). Staff has reviewed and prepared draft correspondence in response (refer to Attachment 2). Issues identified include the lack of coordination in preparation of the document, lack of reference to the County's previous input, concern about limiting the scope of the document due to time constraints contrary to the 2012 Planning Rule, and that the document is for three forests (rather than specific to the INF). Comments are requested by January 31, 2014.

The Forest Service is planning a public meeting on January 30, 2014 in Bishop regarding the Preliminary Need for Change. Staff requests that the Board discuss possible attendance at the meeting.

ALTERNATIVES: The Board could direct changes to the correspondence or not submit correspondence. The latter is not recommended due to the importance of the Forest Plan Update to the County.

OTHER AGENCY INVOLVEMENT: Department of Agriculture, U.S. Forest Service; Mono, Fresno, Madera, and Tuolumne counties; other interested persons and organizations.

FINANCING: General fund resources are utilized to monitor planning work in the Forest. Resources for Willdan's assistance with the effort are funded by operating transfer from the Geothermal Royalties fund.

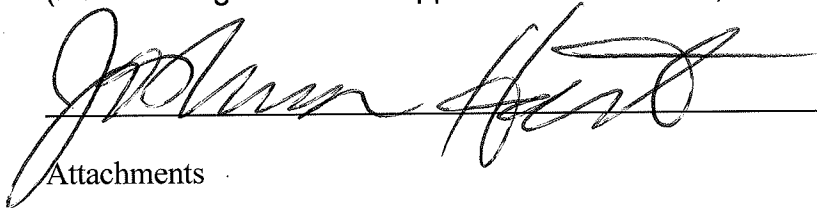
¹ Refer to <http://inyoplanning.org/InyoNationalForest.htm> for more information about the Plan Update/Revision and the County's participation.

APPROVALS

COUNTY COUNSEL:	AGREEMENTS, CONTRACTS AND ORDINANCES AND CLOSED SESSION AND RELATED ITEMS <i>(Must be reviewed and approved by county counsel prior to submission to the board clerk.)</i>
AUDITOR/CONTROLLER:	ACCOUNTING/FINANCE AND RELATED ITEMS <i>(Must be reviewed and approved by the auditor-controller prior to submission to the board clerk.)</i>
PERSONNEL DIRECTOR:	PERSONNEL AND RELATED ITEMS <i>(Must be reviewed and approved by the director of personnel services prior to submission to the board clerk.)</i>

DEPARTMENT HEAD SIGNATURE:

(Not to be signed until all approvals are received)



Date: 1/22/14

Attachments

1. Draft Preliminary Need For Change
2. Draft Correspondence

PRELIMINARY NEED FOR CHANGE

FOREST PLAN REVISIONS, REGION 5 EARLY ADOPTER FORESTS

CONTENTS

Process

Criteria for narrowing themes

Summary of Themes

Narrowing criteria and discussion for each theme

Preliminary FAQs

What themes were chosen and why

PROCESS FOR NARROWING SCOPE AND SCALE OF EMPHASIS AREAS

Assumptions

- Under current plan revision timeline, it is possible to address only a few emphasis areas.
- Not all changes must be addressed now. With the 2012 Planning Rule and an adaptive approach, other changes can be accomplished as needed efficiently. The old plans will be adapted to the new planning rule.
- Alternatives will be designed around emphasis areas.

Criteria for emphasis areas to focus on immediately

- The emphasis area is important to many people, and provides many benefits to people.
- There is a threat to losing benefits if the Forest Service doesn't act within the near future. This includes changes in demand for the benefit.
- Trends: social, economic, or ecological sustainability are at risk in the mid- and long-terms.
- Current management direction as described and implemented does not provide benefits sustainably. This could include new science, monitoring, or changed conditions. There is substantial controversy over current management and general agreement among most people on approaches to improve aspects of current direction.
- Forest plans have the ability to do something substantial about the condition in the next ten years. Alternatives and plan components can be developed within the plan revision timeline (April to May 2014).

VEGETATION, RESILIENCE, WILDLIFE AND FIRE EMPHASIS AREA

Importance to People

Wildland fire affects all aspects of beneficial uses: wildlife and plants; air quality; water quality; recreation; power; carbon management; and communities. There is an imbalance of uncharacteristic, high intensity fire across large areas, and an ecological deficit of characteristic widespread low and moderate intensity fire. This imbalance is impacting beneficial uses in major ways.

Threats to Losing Benefits in the Short-Term: Current Situation and Trends

Large, intense fires are impacting beneficial uses at an increasing rate. In the past, large droughts, insect outbreaks, and fires have occurred but not with the impacts currently experienced. Impacts are due to: how and where the fires, drought and insects occur (e.g. in key habitat, near communities, near power supplies or recreation sites). Forest density and fuels continue to increase, contributing to decreased forest resiliency. Restoration pace and scale are insufficient to reduce threats. A single large fire, such as the Rim Fire, can have major impacts. Restoration strategies do not address the scale of current fires.

Ecological, Social and Economic Sustainability

Forests are vastly modified from historic (pre-European) conditions. They are very susceptible to drought, insect outbreaks, and large, intense fires in the landscape. Changes have impacted connectivity, and habitat of wildlife and plants. For species with limited distributions, the impact can be highly significant. There is a disproportionate impact on old-growth forests that tends to occur in remnants in drainages, or locally concentrated areas. There are impacts on riparian ecosystems where restoration has been deferred or limited. There are many areas where wildland fire played a key role as an ecological process and where restoration is important to biodiversity conservation.

The impacts of fire in larger landscape communities, and human benefits such as water, power, human health, carbon management, and recreation are growing more costly and undesirable for most people. Restoration and recovery of forests and habitat take centuries and are costly. With climate change, there may be a type conversion to a different type (e.g. forest to shrub). Under current landscape conditions, survival and development of young forests to mature forest is becoming more difficult.

Current Management Direction: Opportunities for change

Current plans limit pace and scale of restoration. Restoration is vastly insufficient to change trends. Single species management approaches in the current plans limit landscape approaches that are critical to address dense forests and uncharacteristic fire. New science on management for forest heterogeneity and fire resilience is not addressed. Current fire management policy is not addressed: the spatially explicit resource objectives to facilitate managed fire do not exist. Opportunities for change include:

- Develop integrated resource desired conditions, objectives and management strategies that increase the pace and scale of restoration.
- Meet new planning rule direction emphasizing integrated landscape/species (coarse filter/fine filter) approaches to ecological, economic, and social sustainability.
- Develop spatially explicit resource objectives for managed fire opportunities.

EASTSIDE VEGETATION, RESILIENCE, WILDLIFE, INVASIVE PLANTS AND FIRE EMPHASIS AREA

Importance to People

Numerous beneficial uses to people occur within this extensive landscape: water; wildlife and plants; recreation; communities; range; air quality; and carbon management.

Threats to Losing Benefits in the Short-Term: Current situation and trends

Eastside landscapes are highly impacted by invasive plants, juniper expansion, and uncharacteristic fire. The expansion of invasive species creates conditions that are very hard to restore or reverse. Distribution of native species (i.e. deer and sage grouse), range and recreation are impacted by the changed vegetation and fire. Subalpine trees, such as whitebark pine are increasingly impacted by non-native pathogens and climate change.

Ecological, Social and Economic Sustainability

Eastside landscapes are vastly modified from historic (pre-European) conditions. Invasive species and legacy land uses (e.g. intensive grazing, historic mining, railroad logging, and roads) have contributed to lowered ecosystem resilience. There has been shrinking sagebrush and desert habitat, important to numerous species of conservation concern and game animals. Lands in the mountains on the eastside provide key areas of higher elevation where there has been and will continue to be upward migration of species from lower elevations as climate changes. These “islands” of high elevation mountains are important refugia for many species in climate change but may have reduced resilience.

The impacts of invasive plants and associated uncharacteristic fire have affected ecosystem services and human benefits such as air quality, range, and recreation. Maintenance and restoration of native vegetation is becoming more difficult and costly. Current and future ecosystem services and beneficial uses are at risk.

Current Management Direction: Opportunities for Change

Pace and scale of restoration is vastly insufficient to change trends. Lack of integrated desired conditions, and clear, quantitative objectives limit effective management (e.g. invasive species, species of conservation concern, recreation, grazing). Efforts to reduce the impacts efficiently are hampered with current plans. Single species management approaches in the current plans limit landscape approaches that are critical to address problem. Spatially explicit resource objectives to facilitate managed fire do not exist. New science on fire resilience and cheatgrass invasibility is not incorporated. Opportunities for change include:

- Clear, quantitative, objectives at landscape scale, integrated across key resource areas including fire, invasive species, range, wildlife, transportation, and recreation to increase pace and scale of restoration. Incorporate new fire policy: management of wildland fire for resource benefit.
- Meet new planning rule direction emphasizing integrated landscape/species (coarse filter/fine filter) approaches to ecological, economic, and social sustainability.

WILDLAND URBAN INTERFACE EMPHASIS AREA

Importance to People

Uncharacteristic fire in the wildland urban interface (WUI) affects all beneficial uses to people including: communities; power, water, and communications infrastructure; recreation; scenic character; air quality; and businesses.

Threats to Losing Benefits in the Short-Term: Current Situation and Trends

In the last ten years, a majority of fuel hazard reduction projects have been accomplished in the WUI. Despite these efforts, impacts of large, high intensity fires to communities and infrastructure continue to be a problem for most people. Residents and recreational visitors are concerned. There is increasing awareness that large, high intensity fires, originating in wildlands outside of the WUI contribute to impacts in the WUI. These types of fires are increasing. New social and fire behavior science has identified additional concerns and approaches to address these concerns.

Ecological, Social and Economic Sustainability

Fuel hazard reduction and fire suppression focus on the WUI has reduced the rate and pace of restoration in wildlands. This has left large portions of the forest vulnerable to undesired fire impacts including to wildlife habitat and aquatic/riparian areas. Indirectly, emphasis on fuel hazard reduction and fire suppression in the WUI may have increased the threat of large, high intensity fires traveling to and impacting the WUI. The Rim Fire illustrates this issue. There are many areas where fire played a key role as an ecological process and where restoration is desired.

Single large, high intensity fires, can have major social and economic impacts. Businesses (e.g. recreation and tourism), services (regional power supplies), transportation (e.g. highway closures) are impacted. These impacts are growing more costly and undesirable for most people. The impacts can be long-term, affecting social and economic sustainability over time.

Current Management Direction: Opportunities for Change

Current forest plans emphasize fuel hazard reduction in the immediate area around WUI. This has led to less treatment in the surrounding wildland landscape. Increasingly, wildland fires build intensity in wildlands and then spread toward WUI, overwhelming treatments in the WUI. Single resource based objectives (e.g. wildlife, soils, WUI) have limited effectiveness of WUI treatments. An integrated, landscape approach is lacking. The National Cohesive Strategy was recently updated to improve effectiveness of approaches in reducing impacts to wildlands and WUI. Opportunities for change include:

- Increased pace and scale of restoration of resilience in the surrounding, larger landscape would have a substantial effect on fire threat in the WUI. Integrated landscape objectives within WUI.
- Incorporate the revised Cohesive Strategy. Improved coordination and collaboration in and all lands approach. More efficient information sharing and monitoring to track effectiveness (e.g. joint database of location and extent of fuel treatments in WUI).
- Incorporate new social science on fire prevention or fire science on fire spread into WUI.

MEADOWS EMPHASIS AREA

Importance to People

There is a broad recognition of the importance of meadows from varied perspectives: meadows are an important component of human water supply (sponges for water storage and quality filtering); biodiversity hotspots; sought after for recreation; important for seasonal range use; and carbon storage.

Threats to Losing Benefits in the Short-Term: Current Situation and Trends

Meadows are at risk from climate change, particularly those faced with drying caused by channel cutting or water development. Single resource focused management threatens the sustainability of all components. For example, focus on species of conservation concern can affect economic and social sustainability of grazing and recreation. Conversely, focus on grazing or recreation can affect ecological sustainability of species. The lack of a cohesive, integrated management and monitoring approach leads to perceived conflicts and missed restoration opportunities. New science on the importance of multi-factor condition assessments shows that status of one aspect does not match that of other aspects.

Ecological, Social and Economic Sustainability

Extensive, historic mismanagement (roads, trails, railroad logging, intensive grazing) resulted in a legacy of incised, or downcut stream channels that have impacted the Forest Service's ability to restore and manage meadows. Some meadows are dried out as a result, affecting vegetation and wildlife. Several species of conservation concern depend upon meadow habitats. Drier meadow conditions and limited fire have led to conifer encroachment into meadows, further drying them out and shading typical meadow species. Aspen groves have declined significantly due to lack of fire, drier meadows, and browsing.

Long-term social and economic benefits from water, carbon storage, recreation, and grazing are at risk. Invasive fish place native fish and amphibians at risk. Water storage by meadows is an important adaptation strategy for climate change. There is growing public interest in meadows for recreational and visual uses. Meadows are an important component of working rangelands. There is uncertainty about the impacts of different land uses on water quality from meadows.

Current Management Direction: Opportunities for Change

Desired conditions and objectives for meadow condition and restoration are not integrated and measurable. Current science emphasizing integrated condition assessments is not addressed. Conflict arises over conditions for different resources. Opportunities for change include:

- Develop integrated (biodiversity, water, range, recreation) and measurable objectives for meadow condition and restoration. Incorporate current science emphasizing integrated condition assessments. Enhance collaborative opportunities for meadow restoration.
- Meet new planning rule direction emphasizing integrated landscape/species (coarse filter/fine filter) approaches to ecological, economic, and social sustainability.

AQUATIC AND RIPARIAN EMPHASIS AREAS

Importance to People

Water is essential to economic, social, and ecological values. Aquatic and riparian areas are the focus of human use (water supply) and recreation. Habitat has concentrated ecological value. Aquatic and riparian areas occur in a limited portion of the landscape but are important to animals and plants.

Threats to Losing Benefits in the Short-Term: Current Situation and Trends

Many aquatic ecosystems are at risk. Native trout are restricted to the higher elevations. Amphibians are disappearing from streams at lower elevations. Invasive species, climate change, and uncharacteristic fires are concerns. Special habitats (e.g. springs, fens and aspen) are threatened by these factors, browsing and lack of fire. The combination of warming temperatures, early snowmelt, and extensive water development have impacted aquatic habitat. Growing impacts of large, intense fires can increase soil erosion from older roads crossings and culverts, and affect large wood recruitment. Limits on restoration in riparian areas have led to vegetation and fuel conditions that intensify fires. Riparian and aquatic areas can be sensitive to management and hard to restore once degraded.

Ecological, Social and Economic Sustainability

Aquatic and riparian areas are vastly modified from historic (pre-European) conditions. Extensive water development, introduction of invasive fish, roads, and legacy grazing, logging, and mining have impacted habitat and, biodiversity. Lack of extensive, characteristic, low and moderate intensity fire, has resulted in denser, vegetation, and lowered resilience to high intensity fire. Sustainability of large wood in aquatic ecosystems is at risk. There are few areas that remain with high, less changed biodiversity.

Riparian and aquatic networks are important components of climate change adaptation strategies. Water quantity is dependent on precipitation, timing of snow melt and other climate factors. Water is essential to municipal water supplies, agriculture, and water-based recreation. Sustainability of these services is uncertain.

Current Management Direction: Opportunities for Change

Current management does not identify integrated, measurable objectives for biodiversity, invasive species, water, and riparian vegetation. Cumulative effects of large, intense, landscape fires are not addressed. Direction focuses on restrictions rather than integrated, adaptive management.

Opportunities for change include:

- Develop integrated resource objectives that increase pace and scale of restoration. Emphasize desired conditions and adaptive management rather than prescriptive restrictions.
- Address cumulative effects of invasive species, large intense fires, and large wood inputs.
- Meet new planning rule direction emphasizing integrated landscape/species (coarse filter/fine filter) approaches to ecological, economic, and social sustainability.
- Opportunity to align with some EPA sediment measures and state monitoring standards.

NEED FOR CHANGE – Sustainable Recreation

Importance to People

The three national forests provide a broad range of recreation opportunities to the residents of California's massive urban areas, local communities in the Central Valley and Southern Sierras, and a large contingent of international visitors. Over 4 million recreation visits occur each year. These opportunities connect people with nature in an unmatched variety of settings, activities and traditional beliefs. Recreation contributes to the physical, mental, and spiritual health of individuals, bonds family and friends, instills pride in their heritage, and provides economic benefits to communities and region.

Threats to Losing Benefits in the Short-Term: Current Situation and Trends

Declining federal budgets constrain the ability of the agency to meet current demands for recreation opportunities and access. Fewer resources are available to maintain and operate existing recreation facilities, develop new opportunities, or provide management for recreation. Existing developed recreation facilities have high deferred maintenance and do not meet the recreation preferences of diverse user groups. Population growth will increase demand for recreation opportunities.

Ecological, Social and Economic Sustainability

Favorite places for recreation are often near water (lakes, rivers, streams) that provide critical aquatic and riparian habitat. Some concentrated use areas outside of developed recreation sites are raising public concern. Unmanaged recreation can negatively impact ecosystem health. Climate change may impact many popular water and snow related recreation opportunities, and drive visitors to use higher elevation sites. Higher elevation ecosystems are more vulnerable to impacts. Increased forest density, and uncharacteristic fire, insects, and pathogens produce forest conditions that are potentially unsafe for recreation use and compromise scenic character, reducing recreation opportunities.

The economic vitality and quality of life of local communities is threatened by degraded scenic character and loss of recreation opportunities. Visitors to the national forest support the tourism industry that contributes to the economic vigor of local businesses and stimulates local employment. Counties also receive revenue from sales tax.

Current Management Direction: Opportunities for Change

Current forest plans encourage dispersed recreation use over developed recreation impacting ecological sustainability and cause user group conflicts. Cultural and ecosystem context is missing in current scenery management direction. Forest management can inadvertently create barriers to use and enjoyment by the growing population of ethnic minorities. Opportunities for change include:

- Integrate and incorporate sustainable recreation into other resource objectives.
- Revise the set of recreation opportunities to emphasize each Forest's distinctive roles and contributions. Incorporate ecosystem and cultural context into scenery management.

FREQUENTLY ASKED QUESTIONS

Why aren't fisher and spotted owl management a top issue?

Considerations to maintain fisher and spotted owl habitat and distribution are integrally related to fire and addressed under the Vegetation, resiliency, wildlife, and fire emphasis area. The new planning rule emphasizes integrated ecosystem resource management, sustainability and ecological integrity, rather than single resource management.

Why aren't roads a primary theme?

We are designing a programmatic plan. Most roads issues are more appropriately dealt with at the project level. The forest plan doesn't lay out specific projects but does describe desired conditions and sets out objectives to guide projects, which may include roads. Different alternatives may have different management activities that may be associated with different road requirements and management, but these will be determined at a project scale, with a staged approach.

How does forest plan revision relate to the travel management plan?

As described above, the forest plan revision EIS and the travel management plan are programmatic documents. The forest plan sets the intended direction for forest management. The travel management plans provide the assessment process for determining which roads meet the intended forest plan direction. Projects make the decisions to build, decommission or convert roads to other uses.

Why isn't wilderness a top theme?

Wilderness has a concurrent, separate process. We are following the planning rule process for inventorying of lands suitable for inclusion as wilderness and evaluating wilderness character of those lands.

Why are meadows so important?

They are important for so many different people and things including: water storage, frogs and birds at risk, rangeland, and scenic beauty. There are often conflicts among these different uses and things and single purpose management has not been successful. There is an opportunity to better balance all of these uses and needs sustainably.

Why isn't timber a focus?

There is a concurrent, separate process for timber. We are following legal requirements for timber capability and availability. These are based on whether trees and a certain growth level can be sustained and whether it is outside of current designated areas, such as outside of wilderness. The suitability of timber will be addressed when the alternatives lay out different forest plan choices that affect how much timber is available.

What about threatened and endangered species?

Threatened and endangered species are protected by the Endangered Species Act. The management of species at risk, including threatened and endangered species is addressed in two ways in the new forest plans. First, they are addressed following specific processes identified in the new forest planning rule to identify them and general guidelines to management these species for integrity of their distribution. Second, the new planning rule emphasizes an integrated ecological integrity approach to manage for the ecosystems the species are part of. The key ecosystems are addressed in the emphasis areas.

Why isn't infrastructure included as a focus theme?

Similar to the answer for roads above, the plan is programmatic and does not address infrastructure directly. Alternatives will provide overall direction, and decisions on infrastructure will occur at the project scale.

January 28, 2014

Land Management Plan Revision
US Forest Service
Ecosystem Planning Staff
1323 Club Drive
Vallejo, CA 94592

Re: Draft Preliminary Need for Change for Inyo National Forest Plan Update/Revision

To Whom it May Concern,

On behalf of the Inyo County Board of Supervisors, thank you for the opportunity to review the draft Preliminary Need for Change for the Inyo National Forest (INF) Plan Update/Revision. Per our previous input, we continue to be disappointed in the time it is taking to execute the cooperating agency Memorandum of Understanding (MOU) that we have been working on with Forest Service staff since mid-2012; we continue to look forward to expeditious execution of the MOU to guide our coordination efforts.

Despite the delays in execution of the MOU, we had been pleased that local Forest Service staff was working with our staff in the spirit of coordination. Unfortunately, we were not included in development of the Preliminary Need for Change. We understand that this document was created by Regional Office staff, and we request that the Regional Office include the County in development of future documents in the spirit of coordination embodied by the MOU.

We have been participating in development of the INF for several years now and have expended substantial resources in the endeavor. As you might imagine, we are dismayed that much of our previous input, and particularly most of the issues of most importance to the people of Inyo County, has not been incorporated into the draft Preliminary Need for Change. I will not belabor this input herein (as it is available to Forest Service staff through our previous correspondence and on our website¹). Briefly though, I offer the following:

- Multiple Uses must be addressed throughout the document, pursuant to the Multiple Use Sustained Yield Act.
- Permitting burdens should be identified as issues to be addressed.
- Socioeconomics should be an emphasis area. In particular, the uniqueness of the eastern Sierra and the relative dependence of east-side communities on the INF should be addressed. The need for change should emphasize developing public-private partnerships to enhance our communities and provide for economic resilience and vitality.
- We believe that grazing should be emphasized, and that the need for change should include expanding managed grazing.
- Due to the continuing diminishment of access, we believe that the need for change should include enhanced access.
- The need to minimize smoke impacts from controlled fires to downwind communities should be identified.
- We know that services, infrastructure, and utilities are significant issues for the INF, and should be addressed at a programmatic scale in the Plan Update.
- We acknowledge the document's references to sustainability, and request that this topic be emphasized to a greater degree.

Furthermore, the assumptions used as the basis of narrowing the scope of the process are inappropriate. There is no documentation in the Planning Rule that allows the agency, based on a shortened timeline, to not perform a complete analysis and address all the issues identified in the assessment. The idea that "not all changes must be addressed now" is not contemplated in the new rule. In fact the plan amendment process in the new rule contemplates that all issues identified at this stage of the planning process were addressed appropriately. The plan amendment process bases the amendment on "new information, changed conditions, or changed circumstances." [See Section 219.13(b)] Nothing in

¹ Refer to <http://inyoplanning.org/InyoNationalForest.htm>.

the plan amendment process suggests the agency will address identified areas of need for change based on information or circumstances previously identified by the agency which the agency did not have time to address due to a self-enforced timeline. The weakness of the process the agency has decided to pursue is not only that some areas of need for change will not be addressed but the alternatives analysis of those unaddressed areas will also not occur. This results in a substantially weakened need for change document.

The County of Inyo is also concerned that a need for change document that is supposed to address individual forest land management plans was not created. Instead, in the interest of time and efficiency, the forest service decided to publish a generic need for change document that is supposed to be used as a basis for revision of three forest land management plans. The criteria and recommendations drafted in the need for change document are so generic that they provide the individual forest managers with little or no direction on what changes should be considered when drafting a new plan. They also provide the public with almost no understanding of the issues that need to be addressed in the new land management plan. The public is left with the choice of drafting their own need for change document instead of reviewing and commenting on an agency proposed draft. The individual members of the public are not responsible for managing the forest pursuant to the current plan, reviewing all of the comments from the public and other government agencies during the assessment phase, and of identifying those areas of emphasis that need to be addressed in the need for change stage of the planning process. This is the agency's responsibility, and the agency clearly did not perform its responsibilities during this stage of the process. The excuse that the agency does not have time to complete its responsibilities is unacceptable.

Thank you for your consideration. If you have any questions, please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292.

Sincerely,

Rick Pucci, Chair
Inyo County Board of Supervisors

cc: Board of Supervisors
County Administrative Officer
County Counsel
Planning Department
Doug Wilson, Willdan
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties
Ed Armenta, Inyo National Forest
Randy Moore, Region 5 Forester