



**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:** December 10, 2013

**SUBJECT:** Inyo National Forest Plan Update/Revision – Draft Assessment

**RECOMMENDATION:** Review draft correspondence to the Forest Service regarding the draft Assessment for the Inyo National Forest Plan and provide input.

**SUMMARY DISCUSSION:** The Inyo National Forest (INF) is working on updating its Forest Plan.<sup>1</sup> A draft Assessment for the Update is available for public review, and comments are due December 16. Staff has prepared draft correspondence for the Board's consideration, which is included in Attachment 1. Staff requests that the Board consider the draft correspondence and provide direction for any revisions prior to the public meeting that will be held during the evening.

The draft Assessment summarizes the Topic Papers for the INF, for which the County previously provided input (refer to Attachment 2). The Assessment is organized as follows:

- Chapter 1:** Terrestrial, Aquatic, and Riparian Ecosystems
- Chapter 2:** Assessing Air, Water, and Soil Resources
- Chapter 3:** Assessing System Drivers and Stressors
- Chapter 4:** Assessing Carbon Stocks
- Chapter 5:** At-Risk Species
- Chapter 6:** Assessing Social, Cultural, and Economic Conditions
- Chapter 7:** Benefits to People
- Chapter 8:** Assessing Multiple Uses – Water; Fish, Plants and Wildlife; Range, and; Timber
- Chapter 9:** Recreation Settings, Opportunities and Access, and Scenic Character
- Chapter 10:** Energy and Minerals
- Chapter 11:** Infrastructure
- Chapter 12:** Areas of Tribal Importance
- Chapter 13:** Cultural and Historic Resources and Uses
- Chapter 14:** Lands
- Chapter 15:** Designated Areas
- Conclusions**

Staff's review of the draft Assessment indicates that much of the input regarding the Topic Papers remains an issue for the Assessment. In particular, staff has identified concerns about amphibians, grazing, financing, public/private partnerships, socioeconomics, infrastructure, services, local planning, and the proposed species of conservation concern. However, staff notes that much of the input from the Topic Papers and staff's coordination effort has been at least addressed.

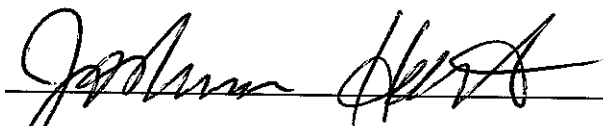
<sup>1</sup> Refer to <http://inyoplanning.org/InyoNationalForest.htm> for more information about the County's participation in the Plan Update/Revision, including links to the Forest Service's relevant online references.

**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 consultant assistance with the effort are funded by operating transfer from the Geothermal Royalties fund.

<b><u>APPROVALS</u></b>	
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: 12/4/13

Attachments:

1. Draft Correspondence
2. Correspondence Regarding Topic Papers

December 10, 2013

Forest Plan Revision  
Inyo National Forest  
351 Pacu Lane, Suite 200  
Bishop, CA, 93514

**Re: Draft Assessment for Inyo National Forest Plan Update/Revision**

Ms. Joyce,

On behalf of the Inyo County Board of Supervisors, thank you for the opportunity to review the draft Assessment. We are pleased that Forest Service staff is working with our staff in the spirit of coordination, and we continue to look forward to expeditious execution of the cooperating agency Memorandum of Understanding to solidify this relationship. We feel that our participation has facilitated development of an Assessment that is more representative of the people that live in and around the Inyo National Forest. We understand that Forest Service staff has considered our staff's input and incorporated where there was agreement. We wish to thank and acknowledge the Forest Service's staff for its efforts to include us in this process.

Our staff has transmitted comments to you regarding the draft Assessment under separate cover, and in general we do not repeat these comments herein. With this in mind, we offer the following additional perspectives regarding the documents, which are similar to our input regarding the Topic Papers:

1. We continue to believe that the Plan Update should focus on multiple uses per the Multiple Use Sustained Yield Act as one of the main themes. We support the people's beneficial uses of the Forest in a sustainable and wise manner pursuant to the Act. In particular, Chapters 3 (Drivers and Stressors) and 8 (Multiple Uses) should better emphasize this concept. The continued reduction in access to the Forest and related multiple uses must be addressed. We repeat our observation that in less than 50 years vehicular access to more than 80 percent of the Forest in Inyo County has been restricted by Wilderness and Inventoried Roadless Areas, thus eliminating a range of multiple uses in these areas and marginalizing those members of the public who may not have the means to travel via non-vehicular means. We acknowledge that firewood gathering is addressed by the Assessment, and we reiterate its importance to our community.
2. As we have previously requested, the Assessment should describe the Healthy Forest Restoration Act's work to protect communities, watersheds, and certain other at-risk lands from catastrophic wildfire, measures to enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape, and other provisions.
3. We are concerned that the Assessment in several instances attributes fish stocking to the amphibians' decline – we reiterate our staff's request to correct these statements. We believe that a variety of factors are contributing to the decline of the species (as documented in the literature), and that the cited references do not support these statements.
4. As we have previously opined, the recreation discussion in Chapter 9 minimally addresses permitting issues. As mandated by the concept of multiple uses, we believe that recreation should be encouraged and that the permitting process should be streamlined.
5. As discussed in Chapter 8, we understand that grazing and other agricultural uses in the Forests have positive impacts on natural resources, not just adverse. We believe that elaboration of

- these benefits should be undertaken to provide balance to the document, particularly in Chapter Nos. 1, 2, and 3. We are concerned that the citations our staff previously provided for these concepts have not been included, and that instead more citations to the contrary were incorporated – at the very least, the disagreement in the literature should be acknowledged.
6. As you know, socioeconomic issues are of utmost importance to us, and while we are pleased to note that extensive resources have been allocated to such topics, we request that continued emphasis be focused on the Forest's positive and negative impacts to our society, culture, and economy.
    - a. We believe that the private sector has an important role to play in the vibrancy of our Forests. We are pleased that the concept of public/private partnerships has been accentuated in Chapter 6 and request that it continue to be emphasized.
    - b. We believe that Chapter 6 should be enhanced to further analyze the macroeconomic trends that are leading to socioeconomic changes in the Forest. We request that particular attention be paid to the fragility of small rural economies such as ours, as has been conveyed by our staff with a specific reference. We acknowledge the work describing the differences between higher-paying resource extraction employment versus lower-paying service employment, and references to specialization of our economy, and request that these topics continue to be considered in this planning process.
    - c. We reiterate our request that the discussion about Payment in lieu of taxes (PILT) and Secure Rural Schools (SRS) in Chapter 6 address the variability in PILT and SRS funding as well as analyzing property tax receipts relative to these payments if the Forests were in private ownership.
    - d. Several references in Chapter 6 continue to quote data about population growth and social view of conservation that are inappropriate to the east side (refer to page 109). We believe that these discussions should be revised to include more relevant information, such as from the Sierra Business Council's Eastern Sierra Innovation and Prosperity Report (2012).
    - e. Our staff will continue to work with you to identify important historical data to enlighten the Update effort.
  7. We continue to be concerned about statements that attribute significant environmental impacts to roads and trails. Given that more than 80 percent of the Forest in Inyo County has been made roadless, and the relative minor disturbances caused by most trails, we believe that these impacts are in general overstated.
  8. We acknowledge the brief references to smoke impacts to communities in Chapter 2; we request that a short subsection be added to further elaborate and summarize issues related to fire management activities and impacts to downwind communities.
  9. Our staff continues to work with you regarding the proposed Species of Conservation Concern. We reiterate our alarm about the vast scale of this new category of special status species, and we will continue our efforts to work to ensure that an appropriate species list is ultimately selected.
  10. We continue to be concerned about the lack of specificity regarding public services and infrastructure, and request that the decision to not include these details in the Plan documents be revisited. Our staff has provided such an inventory for our County, and at the very least a stand-alone document or appendix could be created to describe these resources to better understand relationships and issues.

11. We acknowledge that you have included a discussion of our General Plan in Chapter 14 and repeat our suggestion that references to our County Code be added there, and also in other relevant chapters.
12. We continue to hear from our constituents that the Plan should be attainable and sustainable, and we strongly urge the Forest Service to begin tackling this issue and prioritizing to inform the next phase (i.e., need for change).

Thank you again for the opportunity to comment on the draft Assessment. We look forward to working with you throughout this process. If you have any questions, please contact the County Administrative Officer, Kevin Carunchio, at (760) 878-0292 or at [kcarunchio@inyocounty.us](mailto:kcarunchio@inyocounty.us).

Sincerely,

Linda Arcularius, 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



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PATRICIA GUNSOLLEY  
*Assistant Clerk of the Board*

August 27, 2013

Ms. Susan Joyce  
Inyo National Forest All Units  
351 Pacu Lane Suite 200  
Bishop, CA, 93514

**Re: Draft Topic Papers**

Dear Ms. Joyce,

On behalf of the Inyo County Board of Supervisors, thank you for the opportunity to review the draft Topic Papers. We are pleased that you are working with our staff in the spirit of coordination, and we continue to look forward to expeditious execution of the cooperating agency Memorandum of Understanding to solidify this relationship. Our staff has transmitted comments to you regarding the draft Topic Papers under separate cover, and in general we do not repeat these comments herein. With this in mind, we offer the following additional perspectives regarding the documents:

1. The documents should focus on multiple uses per the Multiple Use Sustained Yield Act as one of the main themes. We support the people's beneficial uses of the Forest in a sustainable and wise manner pursuant to the Act. In particular, Chapters 3 (Drivers and Stressors) and 8 (Multiple Uses) should refer to this concept. The continued reduction in access to the Forest and related multiple uses must be addressed. We note that in less than 50 years vehicular access to more than 80 percent of the Forest in Inyo County has been restricted by Wilderness and Inventoried Roadless Areas, thus eliminating a range of multiple uses in these areas and marginalizing those members of the public who may not have the means to travel via non-vehicular means. Firewood gathering is another multiple use aspect of the Forest, and we request that the discussions regarding this activity with strong cultural history in Inyo County and importance to those with limited means be accentuated.
2. The Healthy Forest Restoration Act's work to protect communities, watersheds, and certain other at-risk lands from catastrophic wildfire, measures to enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape, and other provisions should be described in the documents.
3. We believe that the private sector has an important role to play in the vibrancy of our Forests, and greater emphasis on public/private partnerships should be included in the documents. In particular, a clear link exists between strong local economies and activities on the Forest, and engagement with the private sector can address declining public resources, attract private investment, and benefit nearby economic development. This concept can enhance the discussions in Chapters 3 and 6.
4. The recreation discussion in Chapter 9 minimally addresses permitting issues. As mandated by the concept of multiple uses, we believe that recreation should be encouraged and that the permitting process should be streamlined. Of particular importance to us are the economic benefits that Forest recreation provides to our local economy, such as from hiking guides, porters, packers, fishing guides, motorized recreation, and researchers. References to local volunteer groups should also be expanded to include the Eastern Sierra Four-Wheel Drive Club, the rotaries, and other local service clubs. We also request that the value of these groups be highlighted, and that volunteerism be encouraged and accommodated. One particularly intriguing opportunity is to recruit volunteers to camp at unutilized fire lookouts and watch for fires.

5. We suggest that a concerted effort be taken to identify positive activities taking place on the Forest, emphasizing what's working. In particular, we hope that mitigation measures that are particularly cost effective and consistent with the doctrine of multiple use be described, including potential implementation in various settings. Good examples of this approach in the documents include mitigation measures that are being implemented to reduce erosion from roads and timber thinning activities.
6. We understand that grazing and other agricultural uses in the Forests have positive impacts on natural resources, not just adverse. We believe that elaboration of these benefits should be undertaken to provide balance to the document, particularly in Chapter 8.
7. Socioeconomic issues are of utmost importance to us, and while we are pleased to note that extensive resources have been allocated to such topics, we request that continued emphasis be focused on the Forest's positive and negative impacts to our society, culture, and economy. The discussion about Payment in Lieu of Taxes (PILT) and Secure Rural Schools (SRS) in Chapter 6 should address the variability in PILT and SRS funding as well as analyzing property tax receipts relative to these payments if the Forests were in private ownership. We suggest that additional analysis about the value in terms of average salaries and benefits of resource extraction employment relative to lower paying recreation jobs be better addressed and an analysis conducted to demonstrate how the compensation of these jobs changes with different Plan alternatives. We are also surprised that the analysis indicates that our economy is not highly specialized, as we believe we are highly dependent on Forest-related economic activities, and suggest that the analysis be revisited and elaborated. We believe that additional data regarding historic uses of the Forest should be included to analyze trends, and we understand that the Forest has access to such data. We also suggest that permitting issues be described as a burden to economic development activities, as well as existing uses of the Forest.
8. We acknowledge that the documents address the Inyo Complex fire and mudflow. Based on our experience from that disaster, we suggest that the lack of Forest Service resources to address hazards be addressed, particularly in Chapter 10.
9. We acknowledge that you have included a discussion of our General Plan in Chapter 14 and suggest that references to our County Code be added there, and also in other relevant chapters.
10. We suggest that specific discussions about pesticides, herbicides, and other chemicals utilized in the Forest be added.
11. Our staff has transmitted a critique about the Species of Conservation Concern to you under separate cover. We wish to point out our alarm at the vast scale of this new category of special status species, and request that care be taken in selection of the list.
12. Our staff also has transmitted to you concerns about the lack of discussion about public services and infrastructure for our communities in the Forest. We reiterate this alarm, and request that descriptions of public safety (including search and rescue) services and community infrastructure in the Forest be augmented. Additionally, the Forest's fire protection infrastructure provides an opportunity to benefit local communities that may not be included in local fire protection districts through dispersed or shared facilities that also service communities landlocked or in the vicinity of the Forest.
13. Lastly, the Plan should be attainable and sustainable. The lack of staff and fiscal resources are discussed throughout the Topic Papers. The Plan should be developed to minimize the ability of fiscal and staff resource shortages to prevent implementation. Also, some discussion of how such resources will be prioritized and allocated with respect to the Planning process should be included. We note that significant resources are now allocated to fire management, planning, and legal services that previously were utilized for on-the-ground projects in the Forest and revenue generation for the people, and that the prioritization of these services has been to the detriment of Forest health and sustainability.

Ms. Susan Joyce  
August 27, 2013  
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Thank you again for the opportunity to comment on the draft Topic Papers. We look forward to working with you throughout this process. If you have any questions, please contact the County Administrative Officer, Kevin Carunchio, at (760) 878-0292 or at [kcarunchio@inyocounty.us](mailto:kcarunchio@inyocounty.us).

Sincerely,



Supervisor Linda Arcularius, Chairperson  
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