



BOARD OF SUPERVISORS COUNTY OF INYO

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December 10, 2013

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

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

Mr. Armenta,

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. We believe that partnering with local businesses and communities can enhance land management and economic development.
 - 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 generally overstated. We also wish to reiterate our previous requests that the Forest Service embrace partnering to mitigate and limit impacts.
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.

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9. Our staff continues to work with you regarding the proposed Species of Conservation Concern. We reiterate our alarm about the vast scale and geographic coverage 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.

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