



BOARD OF SUPERVISORS COUNTY OF INYO

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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 lacking 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.

Sincerely,



Supervisor Linda Arcularius, Chairperson
Inyo County Board of Supervisors

cc: Board of Supervisors
County Administrative Officer
County Counsel
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