



BOARD OF SUPERVISORS COUNTY OF INYO

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June 11, 2013

Randy Moore, Regional Forester
Pacific Southwest Region, U.S. Forest Service
1323 Club Drive
Vallejo, CA 94592

Re: Draft Bioregional Assessment, Science Synthesis, and Memorandum of Understanding with Inyo County

Mr. Moore,

On behalf of the Inyo County Board of Supervisors, thank you for the opportunity to review the draft Bioregional Assessment. We understand that Forest planning is complex, and we are expending significant resources participating. I hope that you will keep this in mind in the continuing multiple planning processes occurring presently, and work to streamline the discussions to make wise use of participants' valuable time. With this in mind, we offer the following comments regarding the document:

1. The document 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. The Bioregional Assessment must focus on these legislated concepts.
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 document.
3. Similar to previous planning efforts, the document is focused on the west side and many specific references are irrelevant to planning in the Inyo National Forest.
4. We are concerned about the identification of species of concern and that they are addressed so broadly. We suggest that a succinct closure to selection of the species will work to expedite the planning process.
5. 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 document. 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.
6. The discussion about sustainable recreation minimally addresses permitting issues. As mandated by the concept of multiple uses, we believe that permits for 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. We note that the relationship between recreation and impacts to natural resources is tenuous, and request that additional research be devoted to this issue, especially if quotas are to be considered.
7. We appreciate references to access and search and rescue, and we request that these discussions be expanded.
8. We are pleased to see that smoke impacts on our communities are being addressed. We support fire management strategies that minimize catastrophic wildfires, but request that care taken in implementation.
9. 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.
10. We understand that grazing and other agricultural uses in the Forests may 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.

11. We suggest that transmission for renewable energy development be better addressed, given its importance in meeting California's energy goals. The broader issues of planning for and implementing California's renewable energy vision within and adjacent to the Forest, including potential economic issues and impacts to Forest communities, also should be elaborated.
12. We request that more effort be focused on State-wide, regional, and local planning efforts in regards to the topic areas.
13. The discussion about Payment in lieu of taxes (PILT) should address the variability in PILT funding as well as analyzing property tax receipts relative to PILT payments if the Forests were in private ownership.
14. 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 Forests' positive and negative impacts to our society, culture, and economy.

Science Synthesis

As previously discussed, we believe that an east-side symposium or addendum to the Science Synthesis should be conducted to rectify the focus of the regional planning on the west side of the Sierra. We were dismayed to hear that earlier plans to proceed with this process may be delayed, and we urge you to continue planning for this important work as soon as possible. We offer you our assistance in planning and implementing either option or both.

Memorandum of Understanding

We have worked extensively with your staff to develop a Memorandum of Understanding (MOU) to work together to develop the Inyo National Forest Plan Update/Revision. We are pleased with the draft document and believe that its development has strengthened our relationship. That being said, we are disheartened at the time it is taking for the Forest Service to review this important document so that it may be implemented in the spirit of early and often consultation with local agencies. While we have been working with Forest Service staff to implement the intent of the Agreement, the Forest Service's inaction with the MOU and the need to maintain the schedule has relegated us the status of commenter, contrary to the clear intent of the Planning Rule, the spirit of the MOU, and the County's role as a cooperating agency. We urge you to expedite review of the MOU so that both parties may act and focus on implementation as soon as possible.

Thank you again for the opportunity to comment on the Bioregional Assessment. We look forward to working with your staff to resolve the important issues discussed above. 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
Mary Beth Hennessy, Region 5 Forest Planner