



# BOARD OF SUPERVISORS COUNTY OF INYO

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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 website<sup>1</sup>). 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; attached are Focus Papers that we have prepared demonstrating the specific need for such 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

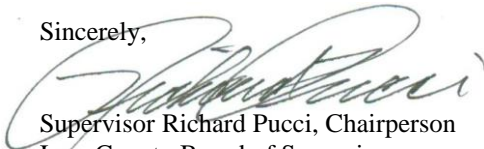
<sup>1</sup> Refer to <http://inyoplanning.org/InyoNationalForest.htm>.

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 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,



Supervisor Richard Pucci, Chairperson  
Inyo County Board of Supervisors

Attachments

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