



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: February 28, 2012

SUBJECT: U. S. Forest Service Land Management Planning Rule

RECOMMENDATION: Review draft correspondence regarding the Forest Service Planning Rule, provide input, and authorize the Chair to sign.

SUMMARY DISCUSSION: The U.S. Forest Service has been working on updating the Forest Planning Rule¹, regarding which the Board has participated extensively (refer to Attachment 2 for previous Board correspondence). A Final Programmatic Environmental Impact Statement (PEIS) and Preferred Alternative were released in January, and a Record of Decision will be issued no less than 30 days following publication of the Final PEIS; staff estimates that the 30-day period will terminate on or around March 5, 2012. The Board conducted a workshop regarding the Rule and the Preferred Alternative on February 14, 2012, and directed staff to prepare draft correspondence for the Board's consideration, which is attached.

OTHER AGENCY INVOLVEMENT:

Department of Agriculture, U.S. Forest Service

FINANCING:

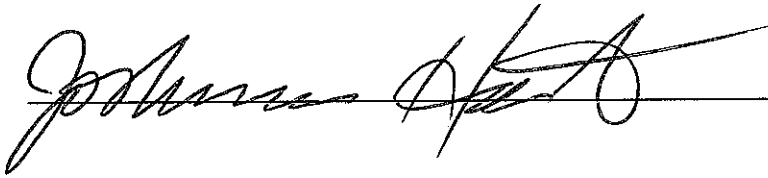
Resources from the general fund are utilized to monitor federal activities.

APPROVALS

COUNTY COUNSEL:	AGREEMENTS, CONTRACTS AND ORDINANCES AND CLOSED SESSION AND RELATED ITEMS (Must be reviewed and approved by county counsel prior to submission to the board clerk.)
AUDITOR/CONTROLLER:	ACCOUNTING/FINANCE AND RELATED ITEMS (Must be reviewed and approved by the auditor-controller prior to submission to the board clerk.)
PERSONNEL DIRECTOR:	PERSONNEL AND RELATED ITEMS (Must be reviewed and approved by the director of personnel services prior to submission to the board clerk.)

¹ Refer to <http://www.fs.usda.gov/planningrule> for more information regarding the Planning Rule update process and the proposed Rule.

DEPARTMENT HEAD SIGNATURE:
(Not to be signed until all approvals are received)



Date: 2-22-12

Attachments:

1. Draft Correspondence
2. Previous Correspondence

February 28, 2012

Tom Tidewell, Chief
USDA Forest Service
1400 Independence Avenue, SW
Washington, D.C. 20250

**Re: Final Environmental Impact Statement
Proposed U.S. Forest Service Land Management Planning Rule**

Dear Mr. Tidewell:

On behalf of the Inyo County Board of Supervisors, I wish to convey to you our appreciation of your staff's admirable efforts to update the Forest Planning Rule. The present attempt to update the Rule has been ongoing for several years, and the Forest Service has been balancing a variety of viewpoints and interests in crafting the new Rule.

The Inyo County Board of Supervisors and the citizenry of Inyo County have participated extensively in the update process. We have provided input into the proposed Rule, particularly in regards to the Rule's direction that the Forest Service coordinate with local governments when updating and amending individual forest plans. This input has been partially incorporated into the Preferred Alternative, and we appreciate that our voices were heard in this important planning process. We request that our input continues to be carried forward into the adopted Rule.

We look forward to working with the Forest Service during implementation of the Forest Planning Rule in the coming years. If you have any questions, please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292 or kcarunchio@inyocounty.us. Thank you for your attention.

Sincerely,

Marty Fortney, Chair
Inyo County Board of Supervisors

cc: Board of Supervisors
Kevin Carunchio, CAO
Randy Keller, County Counsel
Joshua Hart, Planning Director
Doug Wilson, Willdan
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties
Ed Armenta, Inyo National Forest
Randy Moore, Pacific Southwest Regional Forester, Forest Service
Secretary Vilsak, USDA
Sustainable Forest Action Coalition



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Clerk of the Board

PATRICIA GUNSOLLEY
Assistant Clerk of the Board

May 3, 2011

Tom Tidwell, Chief
USDA Forest Service
1400 Independence Ave., SW
Washington, D.C. 20250

**Re: Draft Environmental Impact Statement
Proposed U.S. Forest Service Land Management Planning Rule**

Dear Mr. Tidwell:

On behalf of the Inyo County Board of Supervisors, I wish to thank you for your continued efforts to include the local communities that will be most impacted by the U.S. Forest Service (USFS) in its future planning. In a County such as ours where less than two percent of the land is privately held, the actions of the Forest Service have tremendous impacts.

Since the Planning Rule update currently in process will guide many of the most important decisions in the Inyo National Forest that directly impact us, the Board has been following the update process closely. Individual Supervisors and County representatives attended public meetings on April 6, 2010 in Sacramento and Bishop. The Board participated in a conference call with the Regional Forester and other Forest Service staff on April 22, 2010, and County representatives attended the National Forums in August 2010 and March 2011. Attached is correspondence previously submitted by the Board regarding the update effort.

With this extensive participation in mind, we offer the following comments regarding the proposed Rule and Draft Environmental Impact Statement (DEIS).

1. Actions of the Forest Service have tangible direct, indirect, and cumulative impacts on the communities in the vicinity of the Forests. In Inyo County, these impacts are significant due to the proportional size of the Forest to the local population and privately held land base. Many in our communities rely on the Forest for their livelihood, as well as hold deep spiritual and cultural links to the Forest. Unfortunately, we note that that in many places the proposed Rule to the contrary indicates that the Forest Service has limited influence outside of the Forests. For example, on page 8491 of the Federal Register Notice, it states "...the Agency has more influence over the factors that impact ecological sustainability on NFS lands...than it does for social and economic sustainability...". In Inyo County and many other rural areas these statements are just not true. In our County for example, many communities are stagnant or shrinking due to past efforts to limit access to the Forest.
2. We are concerned that the proposed Rule elevates ecology and science above other considerations. While we support the proper role of science in planning, we encourage the Forest to engage in a comprehensive planning approach that balances ecosystem conservation with social and economic needs. We believe the Rule's emphasis on special status species will further distort the planning process. We strongly believe that through careful balancing of these important objectives, overall environmental benefits can be maximized.

3. We are encouraged that our previous input regarding coordination has been partially incorporated into the Rule at 219.4(b). However, we are concerned that the proposed Rule does not adequately encompass the obligation to coordinate Forest and local plans. Specifically, Inyo County has the following concerns:

a. The proposed language suggests that coordination with local government will be accomplished "to the extent practical and appropriate." The County believes that coordination is a mandate, and therefore is always appropriate and required. (See 16 U.S.C. § 1604(a), *Calif. Resources Agency v. United States Dept of Agriculture*, Slip Copy, 2009 WL 6006102 (N.D.Cal. 2009).) It is understood that the depth and nature of coordination may change with the situation, but the language as proposed would mean that there may be times when it would not be appropriate to coordinate with local government. The County believes that failure to coordinate is not a lawful option.

b. The proposed language states: "nor will the responsible official conform management to meet non-Forest Service objectives or policies". This statement contradicts the purpose of coordinating with local government, which is to attempt to conform USFS and local management plans to meet each other's objectives (within the legal parameters applicable to each agency). Utilizing federal planning to help achieve local government priorities should be a primary objective of coordinated planning and should not be ruled out from the beginning. At the very least, federal plans should not contradict local plans. Otherwise, coordination becomes nothing more than a paper exercise.

c. A primary goal of coordination should be achieving consistency between federal and local plans within the legal mandates applicable to all entities. This would minimally involve ensuring that USFS plans do not contradict local plans. The attempt to achieve consistency should be an iterative process between the local agency and the USFS. This goal has long been recognized in Bureau of Land Management rules regarding coordination with local government in planning activities. (See 43 CFR 1610.3-1) The 1982 Forest Planning Rule (36 CFR 219.7) was weak in this area and the proposed rule is weaker still. Achieving consistency between plans is inherent in the concept of "coordination." Two inconsistent plans could hardly be considered coordinated planning.

4. The DEIS' economic impact analysis is deficient in that it does not include any analysis of the Forests' negative economic impacts on communities around them. We agree that the Forests have great economic benefits, but we believe that the adverse impacts of the Forest to our community have been minimized in the DEIS. In Inyo County, forest planning practices have resulted in significant socioeconomic impacts to our communities. For example, packing and grazing were eliminated from certain areas of the Inyo National Forest, destroying industries that had existed for generations and significantly altering local society and culture, thereby eliminating the livelihoods of hard working people and decimating our towns. We therefore request that the Rule include a requirement that Forest Plans, revisions, and amendments evaluate and minimize negative socioeconomic impacts to local communities. Multiple uses should be encouraged by the Rule to create vibrant rural economies. Furthermore, we are concerned that the modeling undertaken for the Rule is proprietary, and we cannot access the basic assumptions and inputs in the model for verification. As discussed previously, the Rule's emphasis on ecosystems and special status species will result in adverse socioeconomic impacts, which are not addressed in the DEIS.

5. Based on our participation in the scoping process, we had understood that recreation would be given greater emphasis in the proposed Rule. This has not been the case, and the Rule's recreational components seem focused on minimizing recreational opportunities for purposes of sustainability. Recreation is one of the Forests' greatest contributions to society, especially so in our community, and to minimize recreation's role in the Rule is non-responsive to previous input and contrary to common sense. Recreation should not be a minor issue in Forest planning, but to the contrary, should be one of the central goals to create vibrant

Tom Tidwell, Chief
USDA Forest Service
May 3, 2011
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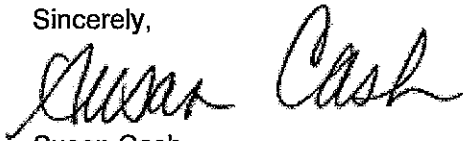
rural economies. Although we agree that the potential adverse impacts of recreation should be addressed in the planning process, the proposed Rule's emphasis on sustainability is misguided; to the contrary, providing accessibility to the Forests should be a primary goal, with objectives to minimize recreational impacts secondary. We are particularly concerned that the potential benefits of motorized access to the Forests is ignored, when in fact, few Forests are easily accessed by other means. Again, the Rule should encourage multiple uses to create vibrant rural economies.

6. The proposed Rule's dependency on adaptive management could result in constant revisions to Forest Plans, thereby creating an environment of uncertainty and potentially adversely impacting local economies. We therefore request that a limit on the number of Plan revisions per a unit of time (or other limitation) be included in the Rule to provide greater assurances that Forest plans will be implemented.

7. We are concerned that the definition of restoration appears to depend on a process that has not concluded (refer to Notice page 8503). Any future alterations to the definition of restoration in the Rule should be properly vetted.

Thank you for your consideration and efforts to create a Rule that will benefit the many communities in and around the Forests, including Inyo County. If you have any questions, please contact the County's Administrator, Kevin Carunchio, at (760) 878-0292 or by email at kcarunchio@inyocounty.us.

Sincerely,



Susan Cash
Chairperson, Inyo County Board of Supervisors

Enclosures

cc: Board of Supervisors
Kevin Carunchio, CAO
Randy Keller, County Counsel
Doug Wilson, Willdan
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties
Bear West Company
Ed Armenta, Inyo National Forest
Randy Moore, Pacific Southwest Regional Forester, Forest Service
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Clerk of the Board

PATRICIA GUNSOLLEY
Assistant Clerk of the Board

April 22, 2010

Mr. Tom Tidwell, Chief
USDA Forest Service
1400 Independence Ave., SW
Washington, D.C. 20250

RE: National Forest System Land Management Planning Rule

Dear Mr. Tidwell:

On behalf of the Inyo County Board of Supervisors, I wish to relay our appreciation that additional outreach to locally elected officials took place on April 22, 2010, regarding the update to the Forest System Land Management Rule. While we were discouraged that the Regional Roundtables were scheduled at a time when most Boards of Supervisors in California conduct their regularly scheduled meetings, it was heartening that our concern was heard and that the conference call was scheduled for April 22nd.

The Inyo County Board of Supervisors cares deeply about the Planning Rule update, and has submitted correspondence in response to the Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the National Forest System Land Management Planning Rule (see attached). Individual Board members also attended the Regional Roundtables on April 6 to make our constituents' voices heard. To summarize, the following points are extremely important to us and need to be considered throughout and, hopefully, incorporated in the update process.

- Federal ownership of land area is concentrated in the western states, including Inyo County where an outstanding 92% of the land area is federally administered on behalf of the American public.
- The development of Inyo County was made possible through the active utilization of federally-administered, publicly-owned lands for mineral extraction, raising livestock, farming, harvesting timber, water storage and conveyance, energy generation, wildlife habitat, and recreational activities.
- Through the years, the use of the federally administered, publicly-owned lands has been constrained by the designation of Wilderness Areas, monuments, roadless areas, and park areas, which has severely reduced the availability of these lands for active utilization.

- Recreation is the only permissible use in many of these designated areas, and the types of recreation allowed are also restricted.
 - Other uses that should be considered include mining, logging, grazing, energy development, and water storage. It appears that maintaining the local communities, culture and economy were not considered when making these designations.
 - Recreation is an important and vital use in the Forest, and should be given greater importance in the principles or as a standalone principle.
 - Similarly, the concept of continued active utilization of the Forest – for mining, timber harvesting, grazing, water storage, and energy production needs to be embodied in the principles or as a standalone principle.
 - Restoration needs to be defined, since the term has different meaning to different people. To what level or standard will the Forest be “restored?” Pre-man? Pre-European contact? 19th Century? 18th Century? 17th Century? 16th Century? 15th Century? What does this look like?
 - A role for locally elected officials needs to be included in the Forest Planning Rule and the update process. At a time the Forest Service professes to want help in gaining local input, it needs to recognize that locally elected officials represent the broadest spectrum of citizens in a jurisdiction, and have been elected to represent the population of the local jurisdiction.
 - This rulemaking is extremely important to the concept of local involvement in forest planning. This rulemaking will essentially define what involvement local government will have in forest planning.
 - “Coordination” is not a NEPA term and is not constrained by the NEPA process. It is a separate mandate in the forest planning statutes and regulations. Cooperating agency status is a NEPA concept, and while it may overlap with coordination responsibilities, it does not replace them. There is no requirement for a federal agency to attempt to reconcile its plans with those of a cooperating agency. “Coordination”, whatever it is defined to be, should not be allowed to be co-opted by the NEPA process. It is separate and greater than NEPA, even though NEPA is a good platform to fulfill coordination responsibilities.
-

- Local governments provide a function that no other governmental or “stakeholding” entity can provide. Counties in particular are the smallest level of government that represents all sides to these land use issues and are in the best position to achieve the democratic compromises that can lead to public acceptance of federal land use plans. Only at the county level do neighbors engage neighbors in these contentious decisions. No higher level of government has the ability to engage all segments of the community in the debate and attempt to achieve a consensus. Federal agencies have done a disservice to themselves and the local communities by ignoring the input of local government. Federal agencies actually undercut the democratic function when minority groups at the local level can achieve their objectives by organizing and lobbying at the federal level to achieve their objectives, without having to convince their neighbors and the general community that they are correct. More engagement at the local level should be encouraged, rather than less. The only way to do this is to provide local government a strong voice in planning decisions in their jurisdictions, so that communities within the jurisdiction have reason to engage at the local level.
- The 1982 Forest Planning Rule, as it defines coordination, is insufficient. It allows a federal officer to determine what local plans are applicable to a proposed Forest Plan and allows the federal officer to determine if the proposed Forest Plan is consistent with the local plan. It should be the *local government* that identifies which of its planning rules are relevant to the proposed Forest Plan and it should be the *local government* that determines if the proposed Forest Plan is consistent with local plans. Furthermore, as in the BLM regulations, there should be a requirement that the Forest Plans be consistent with local plans, unless federal law or regulations prohibit such consistency. Additionally, if consistency is not achieved, the decision document should explain why consistency could not be achieved.
- It is critical that future land use planning for the federally owned land consider the impacts on the culture and economy of the surrounding communities (e.g. whole lands approach). The analysis should accurately consider the impacts on individual communities. The stated principle that “the sustainable use of public lands to support vibrant communities” is critical. Inyo County believes that coordination with counties is critical to meeting this principle – Inyo County should have influence, not just input. The following elements are necessary for successful coordination:
 - Forest plans must be consistent with local land use plans to the maximum extent practicable, consistent with federal law.
 - Coordination with local government should commence at the earliest possible time. Ideally, local land use plans will be consulted prior to developing a proposed forest plan, and the local government consulted prior to the proposed plan being released to the public and prior to issuance of a Notice of Intent to prepare an EIS or other procedure required by the National Environmental Policy Act.

- The Forest needs to recognize that local government is the expert on the meaning and application of its local plans. The Forest should solicit the views of local government to determine if the proposed forest plan is consistent with local plans, as interpreted by the local government. Local governments should be given sufficient time to review proposed plans and comment in writing to the Forest official.
 - Where inconsistencies are identified by the local government, forest officers should meet with local government officers to achieve consistency. The forest service should create a joint task force with the local government or governments to work toward consistency in their plans.
 - The EIS for an individual forest plan should reflect consideration of the objectives of local government plans and policies, an assessment of the interrelated impacts of these plans and policies, a determination of how each forest plan should deal with the impacts identified, and consideration of alternatives to resolve conflicts among the plans.
 - Where a forest plan may not be made consistent with the local plan, the EIS prepared for the plan should explain how and why its plan is not consistent with local plans, as determined by local authorities, and explain why its plan cannot be made consistent with local plans.
- In the furtherance of these goals, Inyo County has adopted a Government Element of its General plan that enunciates its land use philosophies and policies for the use of the federally owned lands, and the interrelationship between Inyo County and other levels of government.
 - The EIS should include, at a minimum, an analysis of how the Proposed Forest Planning Rule addresses these principles.
 - If an "All Lands" approach is to be embodied in the new Planning Rule, it must be constructed in such a manner so as Forest land use plans are responsive to and yield to adjacent and nearby land uses rather than attempting to impose Forest Service values and policies and neighboring private and public land owners.
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Mr. Tom Tidwell
April 22, 2010
Page FIVE

Thank you. We will continue to monitor the progress of the Planning Rule Update, and anticipate providing additional input. If you have any questions regarding these matters, please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292.

Sincerely,



Supervisor Richard Cervantes, Chairperson
Inyo County Board of Supervisors

Attachment

cc: Board of Supervisors
Kevin Carunchio, CAO
Randy Keller, County Counsel
Doug Wilson, Willdan
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties
Bear West Company
Randy Moore, Pacific Southwest Regional Forester, Forest Service
Secretary Vilsak, USDA



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Clerk of the Board

PATRICIA GUNSOLLEY
Assistant Clerk of the Board

January 26, 2010

Forest Service Planning NOI
C/O Bear West Company
172 E 500 S.
Bountiful, UT 84010

RE: Notice of Intent to Prepare an Environmental Impact Statement for the National Forest System Land Management Planning Rule

To Whom It May Concern:

Inyo County appreciates the opportunity to participate in developing the new Planning Rule to guide planning efforts for national forest land. On behalf of the Board of Supervisors, please consider the comments in this correspondence in crafting the new Rule, alternatives for analysis in the Environmental Impact Statement (EIS), and the environmental analysis in the EIS.

Planning efforts for federal land have tremendous impacts on the communities that are surrounded by these lands. A county such as ours, which is 95% federal land, is a prime example. When so much of the environment in which a community exists is controlled by federal land use planning, the culture, way-of-life, and very existence of the community relies on the use allowed of those lands. It can serve no national purpose to plan for the use of federal lands in such a way that symbiotic communities lose their identity as a result.

Inyo County is therefore pleased to observe that an important principle of the new planning rule is "the sustainable use of public lands to support vibrant communities." There can be no better means to achieve this goal than to provide a strong role for local communities in the development of national forest plans. Congress recognized and protected a strong role for local communities when it created mandates for federal officers to coordinate with local governments in the creation of forest plans.

Coordination with county government is particularly important. County government is the one level of government that represents the citizens who are directly affected by federal land use plans. It is county government that is the spokesperson for local populations and which, ideally, can create a consensus around the balanced use of federal lands. A coordinated planning process can strengthen forest plans and the communities that are so dependent on those lands for their economic, social and cultural health.

Recent planning rules, in our estimation, have not sufficiently protected the obligation to coordinate planning efforts with local land use plans. To an important extent, this has led to the disenfranchisement of local governments and the communities they represent in the federal planning process. Inyo County supports collaboration. But, while collaboration is a valuable exercise in public participation, it seldom involves more than a series of bargains struck between various interest groups, none of which represent more than a segment of the population, and the most successful of which are the best organized or best funded rather than best representative of the citizenry.

Collaboration is not governing, and must not replace or overshadow the viewpoints of a local government that represents the variety of groups and points-of-view which comprise an organic and living community. Local governments are not "stakeholders" in a collaborative planning process, they are the voice of the community. Only a governmental entity, elected by the people and responsive to it, is able to incorporate and legitimize the compromises necessary to the common good and only a governmental entity can truly represent its constituents. And only the most local of governments, counties, can speak for the communities that live adjacent to the forest.

Inyo County recognizes that there are interests in federal lands beyond those of its population, but believes Congress has correctly determined that citizens should have extraordinary input into forest plans that directly affect them. It is a matter of providing communities the right of self-determination and the ability to influence, if not control, their destinies.

Inyo County therefore petitions the Department of Agriculture and the National Forest Service to strengthen the coordination mandate in the new Planning Rule, with the objective of providing local populations an effective voice in planning for the national forests. We propose the following principles for effective coordination:

1. Forest plans should be consistent with local land use plans to the maximum extent possible, consistent with federal law.
2. Coordination with local government should commence at the earliest possible time. Ideally, local land use plans will be consulted prior to developing a proposed forest plan, and the local government consulted prior to the proposed plan being released to the public and prior to the issuance of a Notice of Intent to prepare an EIS or other procedure required by the National Environmental Policy Act.
3. The Forest should recognize that local government is the expert on the meaning and application of its local plans. The Forest should solicit the views of local government to determine if the proposed forest plan is consistent with local plans, as interpreted

- by the local government. Local governments should be given sufficient time to review proposed plans and comment in writing to the Forest official.
4. Where inconsistencies exist, forest officers should meet with local government officers to achieve consistency. The forest should create a joint task force with the local government or governments to work toward consistency in their plans.
 5. The EIS for an individual forest plan should reflect consideration of the objectives of local government plans and policies, an assessment of the interrelated impacts of these plans and policies, a determination of how each forest plan should deal with the impacts identified, and consideration of alternatives to resolve conflicts among the plans.
 6. Where a forest plan may not be made consistent with the local plan, the EIS prepared for the plan should justify why its plan is not consistent with local plans, as determined by local authorities, and explain why its plan cannot be made consistent with local plans.

If these principles for coordination are not incorporated into the Planning Rule, then the EIS for the Planning Rule should include alternatives that do. Furthermore, the EIS should evaluate the potential social, economic, and environmental justice implications of any alternatives that do not provide effective coordination with local government.

The proposed principles do not sufficiently address two important characteristics of the forests, and should be expanded. First, founding purposes of the forests are for grazing, timber, mining, and other economic factors. Management of the forests' resources to promote sustained yields should be paramount in the principles. However, these topics are glossed over, despite their relevance, especially to working landscapes in rural communities. It is therefore recommended that a new principle and associated questions be added in regards to managing natural resources to serve the American people and local economies in a sustainable manner.

Secondly, the forests provide opportunities for recreation that are of utmost importance to visitors and local economies alike. Indeed, most forest visitors' purpose is recreation, and the local communities in the vicinity of the forests depend on these visitors for their livelihood. The principles proposed seem to delegate this reality to secondary consideration. Therefore, it is recommended that another new principle and associated questions be crafted to promote diverse recreational opportunities, including but not limited to hiking, camping, off-road vehicle use, and dispersed recreation.

In addition to coordination issues, the following concepts should be included in the guiding principles when crafting the new Rule:

- Founding purposes of the forests are for grazing, timber, mining, and other economic factors. These topics should be taken into account to a greater degree, and are integral components to creating vibrant, working, rural communities.
- Permitting processes should be streamlined.
- The financial and economic burden of Forest Service bureaucracy should be reduced.

- Restoration and conservation do not necessarily enhance the resilience of ecosystems.
- Flexibility should be allowed for land managers to address actual observed impacts, rather than speculative issues such as climate change, if not applicable.
- Water supply issues should be more focused on forest lands.
- Alternative and hydroelectric energy siting and transmission should be specifically evaluated and included in the analysis.

Thank you. If you have any questions regarding these matters, please contact the County's Planning Department staff at (760) 878-0263.

Sincerely,



Richard Cervantes, Chairperson
Inyo County Board of Supervisors

cc: Board of Supervisors
Kevin Carunchio, CAO
Randy Keller, County Counsel
Doug Wilson, Willdan
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties

