



BOARD OF SUPERVISORS COUNTY OF INYO

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Assistant Clerk of the Board

June 4, 2013

Public Comments Processing, Attn.: FWS-R8-ES-2012-0100 and FWS-R8-ES-2012-0074
Division of Policy and Directives Management
U.S. Fish and Wildlife Services
4401 N. Fairfax Drive, MS 2042-PDM
Arlington, VA 22203

Re: Designation of Critical Habitat for the Sierra Nevada Yellow-Legged Frog, the Northern Distinct Population Segment of the Mountain Yellow-Legged Frog, and the Yosemite Toad

To Whom It May Concern:

On behalf of the Inyo County Board of Supervisors, thank you for inviting us to participate in development of regulations to protect the above species. These resources are an integral component of our natural environment and the history of our County, and we are committed to working with you to reverse their decline. We recognize that these actions will require substantial efforts locally as well as regionally and nationally.

We are concerned that designation of critical habitat in and adjacent to our County will significantly impact us. In particular, measures to limit grazing, trout stocking, and packing will further reduce these important components of our local society, culture, history, and economy. These activities are and continue to be integral to our well-being. Management actions over the last half-century have persistently worked to reduce access to our public lands for recreation and grazing, thus eroding our culture and our historical connection to the land, as well as impacting our economy.

We understand that the science connecting grazing, trout stocking, and packing to the decline of the subject species has been subject to debate, and we request that research continue into the links between declining species vigor and suspected causal variables. We also believe that mitigation measures can and should be promulgated and implemented to minimize potential impacts to the species in the critical habitat areas, while providing for continued access for grazing, recreation, and fishing. If access to the recreational and agricultural resources that are so important to us are reduced, we ask that consideration be given to providing alternative access elsewhere.

Due to the short time-frame to respond to the proposed rule-making, we request a 60-day extension to study the proposal in more detail. If no extension is granted, we request that public hearings be conducted.

Thank you again for the opportunity to provide input into this important rulemaking process. If you have any questions, please contact the County's Administrative Officer, Kevin Carunchio, at (760) 878-0292 or kcarunchio@inyocounty.us.

Sincerely,

Supervisor Linda Arcularius, Chairperson
Inyo County Board of Supervisors

cc: Board of Supervisors
County Administrative Officer
County Counsel
Planning Director
Doug Wilson, Willdan
Regional Council of Rural Counties
California State Association of Counties
Fresno County
Tulare County
Mono County
National Association of Counties
Secretary Jewell, U.S. Department of Interior
Dan Ashe, U.S. Fish and Wildlife Service
Robert Moler, U.S. Fish and Wildlife Service
Stephanie Weagley, U.S. Fish and Wildlife Service
Ed Armenta, Inyo National Forest