



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: Planning Department

FOR THE BOARD MEETING OF: January 19, 2016

SUBJECT: Inyo National Forest Plan Revision

RECOMMENDATION: Receive a presentation from staff about coordination with Forest Service staff regarding the Inyo National Forest Plan Revision and provide input, and; review the Forest Service's most recent proposals regarding Wilderness, Species of Conservation Concern, and Wild and Scenic River Eligibility and draft correspondence in regards thereto, and authorize the Chair to sign.

SUMMARY DISCUSSION: The Inyo National Forest (INF) is drafting an updated INF Plan.¹ The County and the Forest Service have entered into a Memorandum of Understanding designating the County as a Cooperating Agency in developing the Plan, and staff will report on recent activities arising out of its responsibilities in regards thereto. Input from the Board is requested to guide staff in future coordination efforts with Forest Service staff.

In December, the Forest Service shared updated documents regarding Wilderness, Wild and Scenic Rivers, and Species of Conservation Concern. Input is requested by February 1. Staff has prepared the attached draft correspondence regarding the documents, as discussed below.

Wilderness: the County has provided input regarding Wilderness previously, including general support for previous processes (Attachment 2). Relative to the areas considered earlier in Inyo County, new areas are proposed to be added for consideration with the following designations: Harkless Flat, Soldier Canyon, Pilot Mountain Wilderness Addition (2), and Inyo Mountain Wilderness Addition. The Forest Service is requesting details to assist determining if there are evaluation polygons, or portions of them, that should or should not be considered for analysis in the draft Environmental Impact Statement (EIS) being prepared for the Plan Revision. Staff believes that significant recreational and cultural activities occur along Soldier Canyon Road that have altered the character to a point that makes areas along the road ineligible for Wilderness designation, and recommends that a buffer along the road be provided.

Wild and Scenic Rivers: the Forest Service has evaluated numerous new rivers in its Wild and Scenic River inventory in Inyo County. Of these, new designations are being considered for Cottonwood Creek, Oak Creek, Lone Pine Creek, Big Pine Creek, South Fork Bishop Creek, and Rock Creek in the Sierra Nevada. Staff believes that these recommended designations may be appropriate with potentially minimal socioeconomic effects, and recommends no input at this time, pending further analysis in the EIS.

¹ Refer to <http://inyoplanning.org/InyoNationalForest.htm> for more information about the County's participation in the Plan Update/Revision, and the following Forest Service website for more information about the Plan Update, including documents related to Wilderness, Wild and Scenic Rivers, and Species of Conservation Concern currently being reviewed:
<http://www.fs.usda.gov/detail/r5/landmanagement/planning/?cid=stelprdb5444003>.

Species of Conservation Concern: the Forest Service is sharing its most current proposals for the SCC, which includes hundreds of potential species. The County has repeatedly expressed dismay at the scale of the proposed SCC, and recommends reiterating this concern.

ALTERNATIVES: The Board may consider the following alternatives: (1) do not provide input – this is not recommended as described above or (2) direct changes to the correspondence.

OTHER AGENCY INVOLVEMENT: Department of Agriculture, U.S. Forest Service; Mono, Fresno, Madera, and Tuolumne counties; Town of Mammoth Lakes and City of Bishop; other interested persons and organizations.

FINANCING: General fund resources are utilized to monitor planning work in the Forest. Resources for Willdan's assistance with the effort are funded by operating transfer from the Geothermal Royalties fund.

APPROVALS

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

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



Date: 1/11/18

Attachments:

1. Draft Correspondence
2. Previous Correspondence

January 19, 2016

Ed Armenta, Supervisor
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Re: Inyo National Forest Plan Update/Revision – Species of Conservation Concern and Wilderness Being Considered

Dear Supervisor Armenta:

On behalf of the Inyo County Board of Supervisors, thank you for continuing to provide avenues for public input regarding the Update/Revision to the Inyo National Forest Plan. We appreciate the opportunity for the public to participate in development of the Plan, particularly the Species of Conservation Concern (SCC) and Wilderness.

As we have expressed repeatedly throughout development of the Planning Rule and the Update/Revision process, we are very concerned about the scope of the proposed SCC. We believe that the vast scale of the SCC being considered will result in significant socioeconomic impacts to Inyo County by further restricting access to the Forest; increasing permitting burdens for the County, volunteer organizations, non-profits, and private enterprise, and; complicating future Forest actions. As we have indicated previously, we urge considering the SCC to be considered in the Plan in light of all the scientific information available and in balance with other important Plan objectives.

As we indicated in our October 20, 2015 correspondence, we believe that the Forest Service's previous approach to identifying potential areas for additional Wilderness logical and technically sound, and we are disappointed that the Forest Service is revisiting this issue. With regards to the current draft proposal, we suggest that a buffer to Soldier Canyon Road be identified as these areas have been significantly disturbed by past human activities, and do not exhibit Wilderness characteristics.

Thank you for your attention to these matters. Please contact Kevin Carunchio, County Administrative Officer, at (760) 878-0292 or kcarunchio@inyocounty.us if you would like to discuss further.

Matt Kingsley, Chair
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
Randy Moore, Region 5 Forester



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Assistant Clerk of the Board

August 11, 2015

Ed Armenta, Supervisor
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Re: Inyo National Forest Plan Update/Revision – Species of Conservation Concern

Dear Supervisor Armenta:

On behalf of the Inyo County Board of Supervisors, thank you for continuing to provide avenues for public input regarding the Update/Revision to the Inyo National Forest Plan. We appreciate the opportunity for the public to participate in development of the Plan, particularly the Species of Conservation Concern (SCC).

As we have expressed repeatedly throughout development of the Planning Rule and the Update/Revision process, we are very concerned about the scope of the proposed SCC. We believe that the vast scale of the SCC being considered will result in significant socioeconomic impacts to Inyo County by further restricting access to the Forest; increasing permitting burdens for the County, volunteer organizations, non-profits, and private enterprise, and; complicating future Forest actions. We believe that the more than 140 SCC proposed will be unwieldy and difficult with which to work; we strongly encourage striving to diminish the size of the list to provide a more meaningful, effective, and manageable strategy to address at-risk species.

We are disappointed that the current documents under public review do not include any meaningful analysis of why the SCC were selected. According to the Forest Service Directives, SCC should be chosen by the Regional Forester if the best available scientific information about the species indicates substantial concern about the species' capability to persist over the long term in the plan area. According to the Directives to implement the 2012 Planning Rule, species should not be included as SCC if it can be demonstrated and documented that known threats for these species, such as those threats listed for the species by NatureServe, are not currently present or relevant in the plan area. Although NatureServe provides a valuable tool to begin discussing the universe of species that might be considered for SCC, further analysis should be undertaken to determine threats to species, and ultimately to decide what species should be included in the SCC.

We note that the "black box" NatureServe database appears to be the primary determinant of the proposed SCC. Threats listed for the proposed SCC are not consistently available for inspection through NatureServe. Furthermore, it is not apparent how consistently the NatureServe information has been collected or verified, nor what significant threats NatureServe provides for all the species being considered as SCC. For these reasons, it does not appear valid to utilize NatureServe as the primary determinant of SCC.

Ed Armenta
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We believe that the Regional Forester should evaluate whether or not species being considered as SCC are threatened in the Plan area and explain the analysis, and provided for by the Directives. We urge considering the SCC in light of all the scientific information available and in balance with other important Plan objectives.

Thank you for your attention to these matters. Please contact Kevin Carunchio, County Administrative Officer, at (760) 878-0292 or kcarunchio@inyocounty.us if you would like to discuss further.

Sincerely



Inyo County Board of Supervisors

cc: Board of Supervisors
County Administrative Officer
County Counsel
Planning Department
Doug Wilson, Willdan
Rural County Representatives of California
California State Association of Counties
National Association of Counties
Randy Moore, Region 5 Forester



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Clerk of the Board

PATRICIA GUNSOLLEY
Assistant Clerk of the Board

October 20, 2015

Ed Armenta, Supervisor
Inyo National Forest
351 Pacu Lane, Suite 200
Bishop, CA 93514

Re: Inyo National Forest Plan – Process for identifying potential Wilderness Areas

Dear Supervisor Armenta:

On behalf of the Inyo County Board of Supervisors, I would like to thank you for continuing to provide avenues for input regarding the Inyo National Forest Plan Revision. We appreciate the opportunity to participate in development of the Plan and particularly with the issue of wilderness.

The Board would also like to convey our appreciation for the current level of cooperation that the County and Inyo Forest staff shares as you work on the Revision. We understand there must be considerable pressure on the Inyo Forest staff as an early adopter forest. The County appreciates your efforts in the Plan Revision process as an early adopter forest and we applaud your efforts and hard work as you move forward.

We have reviewed the process you used for evaluating and identifying lands that may be suitable for recommendation in the Forest Plan for inclusion in the National Wilderness Preservation System. We believe that the County has been offered ample opportunity and has participated adequately in the development of the currently proposed areas. We find that your process, as summarized, is logical and technically sound and would like to offer our support for your methodology.

Sincerely,

Supervisor Matt Kingsley, Chairperson
Inyo County Board of Supervisors