



# BOARD OF SUPERVISORS COUNTY OF INYO

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September 16, 2014

Ed Armenta, Supervisor  
Attn.: Forest Plan Revision  
Inyo National Forest  
351 Pacu Lane, Suite 200  
Bishop, CA, 93514

**Re: Notice of Intent to Prepare an Environmental Impact Statement for the Inyo National Forest Plan Revision**

Dear Mr. Armenta:

On behalf of the Inyo County Board of Supervisors, thank you for the opportunity to review the Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the Inyo National Forest Plan Revision and the related documentation. We are pleased that Forest Service staff is working with our staff in the spirit of coordination pursuant to our Memorandum of Understanding.

We must reiterate our dismay that one EIS is being prepared for the three early-adopter Forests in Region 5. We find that many references in the NOI are specific to the west side, proving our concern. Absent one EIS being prepared for the Inyo National Forest, we believe that greater specificity for east-side issues should be provided. We acknowledge the attempt of the NOI to do so, but in most cases it appears to be an afterthought.

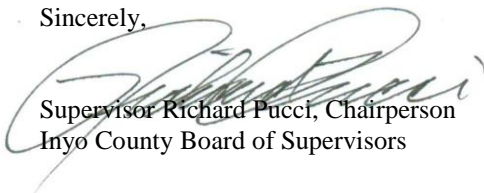
We offer the following specific input regarding the NOI:

1. We continue to believe that Plan Revision should focus on multiple uses per the Multiple Use Sustained Yield Act. Given that the Forest Service will not include this as a main theme in the Purpose and Need, we request that it be further emphasized in the topics being addressed, particularly Ecological Integrity, Terrestrial Ecosystems, Aquatic and Riparian Ecosystems, Water Resources, At-Risk Species, and Designated Areas.
2. We appreciate that the NOI addresses our previous input regarding air quality, local contracting and stewardship, public/private partnerships, and sustainable recreation.
3. We believe that the Purpose and Need continues the mistakes of the past by emphasizing a hands-off approach to Forest management, as exemplified by the escalating costs of fire suppression and impacts to biological resources. A comprehensive active management approach throughout the forest that engages local communities and encourages a diversity of sustainable uses will best work towards fire management and related ecosystem health.
4. We continue to be concerned that socioeconomic is not a primary topic, despite the Planning Rule's direction to the contrary. As with multiple uses, we request that if socioeconomic will not be added as a primary topic that it be further emphasized in the individual topic areas.
  - a. Attached is input from Gruen Gruen + Associates describing overall issues with the approach. As indicated, in order for the plan to balance the policies aimed at improving the sustainability of the natural environment with policies intended to increase socioeconomic sustainability, the EIS should evaluate the impacts of alternative policies on human and natural resources with metrics that facilitate the selection of balanced policies. Similarly, the scope of the EIS and the plan monitoring program should be required to employ transparent processes for identifying and evaluating these tradeoffs.
  - b. As we have previously indicated, scientific research proves that the small rural economies such as ours are particularly fragile, and actions on the Forest have significant positive and negative impacts to us. Inyo County is substantially different from west-side counties due to our far greater reliance on the Forest for our well-being. The Plan for the Inyo National Forest in particular should provide for a diversity of uses to encourage economic sustainability, and provide for living-wage jobs within the context of the previous losses of such employment resulting from changes in Forest management.

5. As we have previously requested, the Plan Revision should specify 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.
6. We continue to be concerned about the impact of the recently listed Sierra amphibians. Attached is correspondence we previously submitted to the U.S. Fish and Wildlife Service (USFWS) delineating our concerns about the importance of recreation areas being considered for critical habitat for the species, and reiterate the potential impacts that designation in these areas could cause. We request that the Forest Service consider the severity of these potential impacts in its consultations with USFWS.
7. As we have previously requested, Plan Revision should address permitting burdens.
8. We are concerned that species protection is being emphasized over multiple uses. We suggest that better balancing these objectives will work towards enhanced species protection in the long-run. We believe alternatives that work toward improving access and enhanced economic vitality should be considered in the EIS.
9. We reiterate our alarm about the vast scale and geographic coverage of the Species of Conservation Concern.
10. We continue to be concerned that public services and infrastructure are not being evaluated, and request that the decision to not include these in Plan Revision be revisited.
11. We continue to urge the Forest Service to address local plans, policies, and regulations in Plan Revision, consistent with the all-lands approach required by the Planning Rule.
12. We continue to hear from our constituents that the Plan should be attainable and sustainable. While we recognize that the Forest Service has begun to address this issue, we believe that greater emphasis is warranted.
13. We are alarmed by the following statement on page 58 and recommend that it be deleted: "Areas recommended for wilderness, and similar areas designated through forest plans, retain their wilderness character until their designations as wilderness or other use are determined by Congress." What are these similar areas? Such an unmanaged approach will result in significant socioeconomic impacts, in light of the vast scope of the ongoing Potential Wilderness Inventory.

Thank you again for the opportunity to comment on the NOI. We look forward to continuing to work with you collaboratively throughout this process. If you have any questions, please contact the County Administrative Officer, Kevin Carunchio, at (760) 878-0292 or at kcarunchio@inyocounty.us.

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  
Randy Moore, Region 5 Forester

September 9, 2014

Josh Hart  
Planning Director  
County of Inyo  
P.O. Drawer L  
168 N. Edwards St.  
Independence, CA 93526

Dear Josh:

We have completed the review of the Forest Service NOI that you requested we conduct. Below, we list the comments that we believe it would be appropriate for the Board of Supervisors to send forward in response to the Forest Service request for comments on their Notice of Intent.

### **Comments in Response to Forest Service August 25, 2014 Notice of Intent**

- The writers of the NOI should be commended for adding interpretation and education into the scope of the management plan.
- We are encouraged by the statement on page 10, "Desired conditions and other plan content for working with partners would be incorporated to demonstrate that they are integral to program of work planning and conducting sustainable recreation activities."
- We are encouraged to see the updating and emphasis placed on the role played by the forest in connecting people to cultural heritage, recreation and tourism opportunities and sustaining treasured places, as also stated at the bottom of page 10 of the NOI.
- The NOI (pages 22 and 23) indicates one EIS for all three forests for reasons of efficiency. Given the differences between the Inyo landscape, particularly its socioeconomic environment, and the Western Forests, the ability of the EIS to best provide direction for the management plan would be greatest if Inyo had a separate EIS. The importance of the Forest to Inyo County is unique because tourism is the driving engine of the Inyo County economy. Inyo County's hospitality sector makes up 25 percent of private employment in the County, while the spillover from tourism is also a major factor in the sustainability of the County's retail trade and service sector employment. We encourage support of visitor-serving industries and development of EIS alternatives that emphasize job creation and economic vitality.
- The NOI calls for socio-economic sustainability in many places, including recreation (for example, page 4 and particularly 9, which calls for a "placed-based model for recreation planning") but the NOI also calls for the sustainability of natural resources in many of its sections (see for example: Ecological Integrity (p. 5), Fire (pg. 11),

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Terrestrial Ecosystems (p. 13), Aquatic and Riparian Ecosystems (p. 15), Water Resources (p. 16), At-Risk Species (p. 17). There will be many tradeoffs the management plan will have to make between the degree to which the sustainability of human and natural resources are encouraged. In order for the plan to balance the policies aimed at improving the sustainability of the natural environment with policies intended to increase socioeconomic sustainability, the EIS should evaluate the impacts of alternative policies on human and natural resources with metrics that facilitate the selection of balanced policies. Similarly, the scope of the EIS and the plan monitoring program called for on page 21 should be required to employ some transparent process for identifying and evaluating these tradeoffs.

- Particularly in the light of recent research indicating that cattle grazing are beneficial to grassland and fire behavior, we are concerned that “addressing the ecological integrity of meadows” discussed on page 16 does not mean removing existing grazing lands. (see Davies et.al, 2010 and Diamond et al, 2009; USGS, 2007).
- Given the importance of hydropower to the generation of power serving local demands, it is important for the impacts of that generation to be identified to inform the plan’s intended updating of hydrology conditions. (p. 16).
- The statement on page 17 raises concerns with the County that the issues raised in our June 3, 2014 letter to Secretary Jewell of the U.S. Dept. of the Interior will not be fully considered. The statement reads, “SNFPA 53, 54, 98 and 114, which are specifically related to the three newly listed federal and endangered amphibian species (Yosemite Toad, Sierra Nevada Yellow-Legged Frog, and the Northern District population segment of the Mountain Yellow-legged Frog would be retained, but would incorporate clarification resulting from consultation with the U.S. Fish and Wildlife.” We suggest the Board attach a copy of their June 3 letter to alert the Forest Service of an issue that is of paramount importance to the economy of Inyo County.
- The place-based model (p. 9) should be described and evaluated in the EIS.
- The “Plan Monitoring Program” (p. 21) should be commended, but in a way that asks that the County receives copies of the model and, of at least equal importance, obtains the visitor data contemporaneously with the Forest Service.
- Page 23 of the NOI discussing the plan includes the following sentence: “This decision will not authorize project-level activities on the three forests.” This sentence concerns the County, particularly with regard to such important issues as designation of motorized trails, hunting regulations and the designation of scenic, wild rivers. In the light of the fact that the plan will be read as providing programmatic NEPA clearance and streamlining for subject and future projects (such as quotas), it would be important that the plan not facilitate subsequent projects that could be detrimental to the ability of humans to enjoy the benefits of sustainable natural resources.



Very truly yours,

*Claude Gruen Nina Gruen*

Claude Gruen and Nina Gruen  
Principal Economist and Principal Sociologist

CG/jl





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*Assistant Clerk of the Board*

June 3, 2014

Secretary Jewell  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

**Re: Final Rule Listing the Sierra Nevada Yellow-Legged Frog and the Northern Distinct Population Segment of the Mountain Yellow-Legged Frog as endangered, and the Yosemite Toad as threatened**

Dear Secretary Jewell:

On behalf of the Inyo County Board of Supervisors, we wish to thank you for the opportunity to participate in development of the listing for the above species, and commend you and your staffs for the hard work you have undertaken to solicit the concerns of an alarmed public and incorporate them into the final rule. We are committed to working with you to reverse the decline of these species, and we recognize that these actions will require substantial efforts locally as well as regionally and nationally.

After reviewing the final rule, we have ongoing concerns that the listing may have detrimental impacts to our regional economy and cultural identity, particularly in regards to certain activities that may be interpreted as a violation of Section 9 of the Endangered Species Act. Pursuant to the listing, these activities would be considered a violation in certain instances where the frog is currently extant; however, activities which are otherwise lawful could be considered a violation throughout the species' historic range if the U.S Fish and Wildlife Service (Service) determines the critical habitat designation is warranted. Inyo County's economy is based primarily on agriculture and tourism, particularly recreational fishing, and any limitations on these activities throughout the exceptionally broad area proposed to be included in the designation would have disastrous consequences on our regional economy.

We urge the Service to refine the final critical habitat rule to make certain that otherwise lawful activities will not be unnecessarily curtailed or prohibited, including but not limited to; fish stocking and recreational angling, hiking, backpacking, equestrian activities including pack-stock, off-highway vehicle use, and other outdoor recreational activities. As established by an economic analysis of the proposed rule<sup>1</sup>, recreational activities in the proposed critical habitat area contribute approximately \$17,000,000 annually to our tourism-based economy. Restrictions to these activities would have an irreparable impact on our regional economy.

Additionally, we encourage the Service to be diligent in ensuring defined primary constituent elements included in the Final Rule specify only those features which are truly essential habitat for the species. Based on the final listing rule, this would exclude lower elevation lakes, where the species does not currently and has not historically existed, as well as highly valued and successful fisheries. We wish to reiterate our request that the following lakes be excluded from the critical habitat designation. This inventory was developed in partnership with the California Department of Fish and Wildlife, and is consistent with the High Mountain Lakes Project, as noted:

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<sup>1</sup> *Socio-Economic Impact on Inyo County of the Proposed Designation of Critical Habitat for the Sierra Nevada Yellow-Legged Frog, Mountain Yellow-Legged Frog and Yosemite Toad*, Gruen Gruen + Associates, 2014

**Inyo County Lakes and Basins Requested to be Excluded from Proposed Critical Habitat**

<b>Location (and Subunit)</b>	<b>Deficient Primary Constituent Elements<sup>2</sup> Section 3(5)(A)(i)</b>	<b>Exclusion Benefits Section 4(b)(2)</b>	<b>Resulting in Extinction Section 4(b)(2)</b>
1. South Lake (Subunit 3E)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Large, deep and well-connected: fish removal is impractical</li> <li>• Easily accessed, heavily used fishery and recreation area</li> <li>• Existing Southern California Edison (SCE) power-generation dam limits habitat quality. Reservoir is frequently drained and is not suitable for habitat.</li> <li>• Would be contingent on removing fish from upstream watershed.</li> <li>• Not in Wilderness Boundary.</li> </ul>	<ul style="list-style-type: none"> <li>• Assurance of existing electrical generation capacity for the state from renewable resources</li> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project as it does not meet selection criteria.
2. Treasures Lakes 1 and 2, and downstream (Subunit 3E)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Large, deep and well-connected: fish removal is impractical</li> <li>• Easily accessed, heavily used fishery and recreation area, including one of the only fisheries with Golden Trout.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is a low priority as a potential recovery site in CDFW's High Mountain Lakes Project.
3. Lamarck Creek, beginning at and including Upper and Lower Lamarck Lakes and Grass Lake (Subunit 3E)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Easily accessed, heavily used fishery and recreation area.</li> <li>• Large, deep and well-connected: fish removal is impractical</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project.
4. North Fork of Bishop Creek in the Paiute Pass drainage, beginning at and downstream from Paiute	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Well-connected: fish removal is impractical and dispersal barriers are few</li> <li>• Easily accessed, heavily used fishery and recreation area</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project.

<sup>2</sup> Analysis is consistent with individual management unit plans from CDFW Region 6's High Mountain Lakes Project.

**Inyo County Lakes and Basins Requested to be Excluded from Proposed Critical Habitat**

<b>Location (and Subunit)</b>	<b>Deficient Primary Constituent Elements<sup>2</sup> Section 3(5)(A)(i)</b>	<b>Exclusion Benefits Section 4(b)(2)</b>	<b>Resulting in Extinction Section 4(b)(2)</b>
Pass (Subunits 3E, 13)	<ul style="list-style-type: none"> <li>• This area is a CDFW experimental fishery, developed in collaboration with local business and stakeholders.</li> </ul>		
5. Rock Creek Lake (Subunit 3D)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Large, deep and well-connected: fish removal is impractical and dispersal barriers are few</li> <li>• Easily accessed, heavily used fishery and recreation area</li> <li>• <i>Bd</i> fungus positive: recolonization efforts by the CDFW have been unsuccessful</li> <li>• Would be contingent on removing fish from upstream watershed.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project as it does not meet selection criteria
6. Rock Creek downstream from Chickenfoot and Ruby Lakes (Subunit 3D)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Well-connected: dispersal barriers are few</li> <li>• Easily accessed, heavily used fishery and recreation area</li> <li>• <i>Bd</i> fungus positive: recolonization efforts by the CDFW have been unsuccessful.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project as it does not meet selection criteria.
7. Pine Creek, beginning at and downstream of Golden Lake (Subunit 13)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Large, deep and well-connected: fish removal is impractical</li> <li>• Easily accessed fishery and recreation area</li> <li>• Fish removal is not a threat to Yosemite Toad, so fish removal should not be considered a management strategy.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project as it does not meet selection criteria.
8. Robinson Lake (Subunit 3F)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Isolated, poor habitat</li> <li>• Moderately-easy to access</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing,</li> </ul>	No foreseeable justification: this location is not included as a potential recovery



**Inyo County Lakes and Basins Requested to be Excluded from Proposed Critical Habitat**

<b>Location (and Subunit)</b>	<b>Deficient Primary Constituent Elements<sup>2</sup> Section 3(5)(A)(i)</b>	<b>Exclusion Benefits Section 4(b)(2)</b>	<b>Resulting in Extinction Section 4(b)(2)</b>
	fishery and recreation area <ul style="list-style-type: none"> <li>• Not in Wilderness Boundary.</li> </ul>	hiking, backpacking, and outdoor recreation sector of the Inyo County economy.	site in CDFW's High Mountain Lakes Project.
9. The North Fork of Independence Creek, beginning at and downstream from Heart Lake (Subunit 3F)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Large, deep and well-connected: fish removal is impractical</li> <li>• Easily accessed, heavily used fishery and recreation area.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project.
10. The North Fork of Big Pine Creek, beginning at and downstream of Third Lake (Subunit 3E)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Easily accessed, heavily used fishery and recreation area</li> <li>• CDFW experimental fishery</li> <li>• Bd fungus positive: existing population has been recently infected and potentially extirpated.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project.
11. Baker Creek beginning at and downstream from Thunder and Lightning Lake (Subunit 3E)	<ul style="list-style-type: none"> <li>• Self-sustaining fish population</li> <li>• Well-connected: fish removal is impractical and dispersal barriers are few</li> <li>• Easily accessed, heavily used fishery and recreation area</li> <li>• Bd fungus positive existing population has been recently infected and potentially extirpated.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	Not applicable: recolonization attempts have been unsuccessful, demonstrating this location is not available for the recovery of the species.
12. The Coyote Flats – the West Fork of Coyote Creek, downstream of Coyote Lake, Baker Creek (Bd positive),	<ul style="list-style-type: none"> <li>• <i>Bd</i> fungus positive</li> <li>• Easily accessed OHV and recreation area</li> <li>• Grazing lease</li> <li>• Rocky Bottom Lake and Funnel Lake seasonal snowmelt lakes and therefore are unsuitable habitat for frogs</li> <li>• Not in Wilderness</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> <li>• Grazing leases in the Coyote Flats supports</li> </ul>	Not applicable: recolonization attempts have been unsuccessful, demonstrating this location is not available for the recovery of the species.

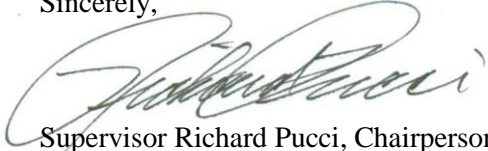
<b>Inyo County Lakes and Basins Requested to be Excluded from Proposed Critical Habitat</b>			
<b>Location (and Subunit)</b>	<b>Deficient Primary Constituent Elements<sup>2</sup> Section 3(5)(A)(i)</b>	<b>Exclusion Benefits Section 4(b)(2)</b>	<b>Resulting in Extinction Section 4(b)(2)</b>
and Cow Creek (Bd positive) (Subunit 3E)	Boundary.	approximately 400 head of cattle, which represents an estimated \$376,000 contribution the agriculture sector of the Inyo County economy.	
13. Mulkey Meadows (Subunit 5B)	<ul style="list-style-type: none"> <li>• Grazing lease</li> <li>• Native populations of Golden Trout</li> <li>• Bd fungus positive – though populations have subsisted.</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> <li>• Grazing leases in Mulkey Meadows supports approximately 235 head of cattle, which represents an estimated \$221,000 contribution the agriculture sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project.
14. Birch Creek <sup>3</sup>	<ul style="list-style-type: none"> <li>• Easily accessed OHV and recreation area.</li> <li>• Grazing lease</li> </ul>	<ul style="list-style-type: none"> <li>• Site visits to this popular fishery support the estimated annual \$17 million fishing, hiking, backpacking, and outdoor recreation sector of the Inyo County economy.</li> </ul>	No foreseeable justification: this location is not included as a potential recovery site in CDFW's High Mountain Lakes Project.

We encourage the U.S. Fish and Wildlife Service to adopt the California Department of Fish and Wildlife's (CDFW) High Mountain Lakes Project in its entirety as the foundation of a balanced species management plan, with an emphasis on CDFW's mission to "manage lakes and streams in a manner which maintains or restores native biodiversity and habitat quality, supports viable populations of native species, and provides for recreational opportunities considering historical and future use patterns". We request the Service consult with CDFW to establish evaluative criteria based on the High Mountain Lakes Project for identifying features considered for inclusion in critical habitat.

<sup>3</sup> The County requests that Birch Creek be removed from consideration for expanding the Critical Habitat area per the suggestion of the US Forest Service.

In closing, we would like to express our interest in participating in the development of the Species Recovery Plan, and request the Service to keep us informed of the species recovery planning process and any additional opportunities to participate. 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](mailto:kcarunchio@inyocounty.us).

Sincerely,



Supervisor Richard Pucci, Chairperson  
Inyo County Board of Supervisors

cc: Board of Supervisors  
County Administrative Officer  
County Counsel  
Planning Director  
Secretary Vilsack, USDA  
Doug Wilson, Willdan  
Regional Council of Rural Counties  
California State Association of Counties  
National Association of Counties  
Fresno County  
Tulare County  
Mono County  
Dan Ashe, U.S. Fish and Wildlife Service  
Jennifer Norris, U.S. Fish and Wildlife Service  
Robert Moler, U.S. Fish and Wildlife Service  
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Ed Armenta, Inyo National Forest  
Chief Tidwell, Forest Service  
Heidi Sickler, California Department of Fish and Wildlife