



BOARD OF SUPERVISORS COUNTY OF INYO

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February 25, 2014

U.S. Forest Service
Attn.: Randy Moore
1323 Club Drive
Vallejo, CA 94592

**Re: Inyo National Forest Plan Update/Revision
Roles and Contributions, Desired Conditions, Purpose and Need, and Objectives**

Dear Mr. Moore:

On behalf of the Inyo County Board of Supervisors, attached is input regarding the Roles and Contributions, Desired Conditions, Purpose and Need, and Objectives for the Inyo National Forest Plan Update/Revision. We had been working closely with the local planning team for the Forest Plan Update, but we understand that with the decision to prepare on Environmental Impact Statement for the three early adopter Forests in the Region, many of the decisions are being made at the Regional level which reduces our opportunity to have meaningful input. We recognize that the Forest Service has not requested this input from us, despite the fact that our draft Memorandum of Understanding (MOU) calls for it, but we are providing it because we feel that this is one of the most important stages of the Plan Update process. We are saddened that the schedule is driving this process at this very important phase of Plan Revision, contrary to letter and spirit the 2012 Planning Rule. However, we hope that your staff will consider this input in development of these components of the Notice of Intent (NOI). We also hope that you will work with us to execute the MOU and fully implement its provisions as soon as possible.

As we have conveyed to Forest Service staff in the past, we are dismayed that one Environmental Impact Statement is being prepared for the three early adopter Forests in the Region. We believe that it is unwise to develop these documents that are so integral to the Plan update in the context of one NOI for three planning processes. Furthermore, we request you to take some time to work with us in developing these integral documents prior to the NOI.

Thank you for your consideration of our input. 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

cc: Board of Supervisors
County Administrative Officer
County Counsel
Planning Department
Doug Wilson, Willdan
Ed Armenta
Regional Council of Rural Counties
California State Association of Counties
National Association of Counties
Ed Armenta, Inyo National Forest

Attachment

Roles and Contributions

The Roles and Contributions should be enhanced to accentuate socioeconomics, access, downwind smoke impacts, and public services/infrastructure.

Desired Conditions

The Board identified the following in its June 19, 2012 correspondence regarding the County's priorities for the Update/Revision, which should guide the Desired Conditions.

1. Access – enhanced to accommodate vehicular use, packing, hunting, hiking, and other recreational opportunities, as well as mining and other uses of the Forest. Mitigation opportunities for potential environmental impacts resulting from increased access should be identified and implemented.
 - a. Roads and trails should be protected and expanded to provide access for recreation and exploration for natural resources and other uses of the Forest, including grazing, mining, and the activities of native peoples (such as gathering).
 - b. Roadless Areas should be identified for removal that are no longer relevant or roadless.
 - c. Conflicts between biological resources and human access should be identified and planned for.
2. Vibrant Economy – the Plan should contribute substantially to the local economy due to the impact of the Forest on the County's culture and fiscal health, and should not result in significant socioeconomic impacts.
 - a. Grazing, Mining, Renewable Energy Production, and other Uses – the Plan should support and encourage consumptive and sustainable uses of the Forest to contribute to the County's economy and culture.
 - b. Roads and trails should be protected and expanded to provide access for recreation and exploration for natural resources. This type of recreation is an important economic driver for the County.
 - c. Mitigation Bank – opportunities to shift land acquisition for mitigation of environmental impacts to restoration of degraded wilderness areas should be incorporated into the Plan to accommodate mitigation of human development elsewhere in the County.
3. Local Culture – the Plan should support and enhance the culture of local communities to the extent social and cultural issues revolve around the forest.
 - a. Public Safety – access and accommodation for public safety purposes should be of paramount concern in the Plan, including for law enforcement (such as eradicating illegal drug production), fire management and suppression, and search and rescue.
 - b. Provide access to the Forest for gathering activities, prospecting, sightseeing, exploration, and camping.
 - c. Provide a continuing voice to the people living around the forest through their local government representatives.

Purpose and Need

We offer the following guiding principles for the Purpose and Need from the County's perspective, based on previous input into the Plan Update.

1. There is a need to expand multiple uses per the Multiple Use Sustained Yield Act. Multiple uses have been diminished in the Forest, and there is a need to refocus the Forest's planning priorities to expand and enhance multiple uses.

2. There is a need to protect communities, watersheds, and certain other at-risk lands from catastrophic wildfire and for measures to enhance efforts to protect watersheds and address threats to forest and rangeland health, including catastrophic wildfire, across the landscape, and further other provisions of the Healthy Forest Restoration Act.
3. There is a need to streamline the permitting process. Permittees and the Forest outlay significant resources for minor permits, and streamlining the process can enhance the local economy.
4. There is a need to accentuate the private sector's role in the vibrancy of our Forests. Forest Service resources are inadequate to provide for all of the Forest's needs, and with continuing diminished budgets, this situation is expected to worsen. By partnering with local businesses and communities, land management and economic development can be enhanced.
5. There is a need to address the fragility of small rural economies such as ours, which is dependent on the National Forest. The socio-cultural links between the Forest and our communities make this dependency all the more sensitive to change.
6. There is a need to provide for robust fire management capabilities and manage smoke impacts to communities. Severe wildfires can devastate the Forest and impact our communities, and there is a need for expanded fuels management programs; however, care should be taken to minimize smoke impacts to our communities from these activities.
7. There is a need to better plan for public services and infrastructure. These assets are in many cases tied to the Forest, and can be enhanced through resource-sharing.

Objectives

We believe that the following Objectives exemplify the type of outcomes that would be most productive for the Forest Plan Update:

1. Work to enhance populations of the Sierra Nevada Yellow-Legged Frog, the Northern Distinct Population Segment of the Mountain Yellow-Legged Frog, and the Yosemite Toad while preserving fishing opportunities.
2. Provide for enhanced access to existing trailheads, including expanded camping and parking opportunities.
3. Enter into agreements with private sector and non-profit entities to expand existing campgrounds and develop new campgrounds.
4. Reduce permit processing times by 25 percent within five years.
5. Reinstitute grazing in meadows.
6. Partner with local businesses, communities, community groups, non-profit organizations, and volunteers to manage projects and recreational amenities.
7. Expand multiple uses in the Forest and quantitatively measure the scope, number, and nature of such uses.