



BOARD OF SUPERVISORS COUNTY OF INYO

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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
August 11, 2015
Page TWO

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

A handwritten signature in black ink, appearing to read "Jeff Sapp". The signature is fluid and cursive, written over a light blue horizontal line.

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