

MONO COUNTY PLANNING COMMISSION

PO Box 347
Mammoth Lakes, CA 93546
760.924.1800, fax 924.1801
commdev@mono.ca.gov

PO Box 8
Bridgeport, CA 93517
760.932.5420, fax 932.5431
www.monocounty.ca.gov

DRAFT SPECIAL MEETING MINUTES

JUNE 9, 2016

COMMISSIONERS: Scott Bush, Chris I. Lizza, Mary Pipersky, Dan Roberts (District 2 commission vacant)

STAFF: Scott Burns, director; Gerry Le Francois, principal planner; Courtney Weiche, associate planner (via video); Christy Milovich, deputy county counsel; Nick Criss, compliance officer; Garrett Higerd, public works; Paul Roten, public works (via video).

GUESTS: Michael Ursich; Terry Heaton.

1. CALL TO ORDER & PLEDGE OF ALLEGIANCE: Chair Chris Lizza called the meeting to order at 10:05 a.m. at the Town/County Conference Room, Minaret Village Mall, Mammoth Lakes, CA, and attendees recited the pledge of allegiance to the flag.

2. PUBLIC COMMENT: None.

3. MEETING MINUTES

MOTION: Adopt minutes of May 12, 2016, as submitted/amended (Bush/Pipersky. Ayes: 4-0.)

4. PUBLIC HEARINGS

A. VARIANCE 16-001/Heaton. The proposal is to allow for future construction of an addition to an existing single-family residence and bridge within the 30' blue-line stream setbacks. Project is located at 25 Granite Ave. in the community of June Lake (APN 001-510-305). Property is 5,000 sf +/- and has a land use designation of Multi-Family Residential High (MFR-H). The project qualifies as a CEQA exemption. *Staff: Courtney Weiche, Associate Planner*

Scott Burns reported Associate Planner Courtney Weiche is departing after eight years of handling numerous controversial projects, serving as primary building permit planner, and covering night meetings. He thanked her for all her efforts and services provided to Planning Commission.

Courtney Weiche outlined the project via videoconference PowerPoint due to later appointment north. She discussed setbacks for yard and stream, and summarized the findings.

Is existing structure compliant with setbacks? *Nonconforming front, but side OK.*

Existing structure appears to be sinking into meadow. Stable? *Looked stable.* Bush thought it was optical illusion. Heaton stated it was built from old USFS cabin, doesn't lean as much as it looks.

Roberts: Very old, rustic small garage historically since a child. Raised, foundation under to level/stabilize. Convert into small studio.

Where does stream flow? Higerd indicated it picks up at corner of property, below Granite Avenue, discharges at basin in Gull Lake Park. Main channel flows between June and Gull lakes through upgraded storm drain system. It's in designated flood plain.

Problems with historic flooding? Higerd recalled significant channel work in early 1980s, current path was set. Upgraded structures, culverts to improve flow of water.

Why no vegetation removal? Wildlife refuge? Higerd mentioned June Lake Streets Project reduced impact. Ditch maintenance. Burns recalled disturbance was not part of project. Different issue. Weiche indicated specific requirements by Public Works.

Roten referenced grading ordinance and flood management. Project will require grading permit, as it's in flow path. If it affected drainage flow, or further requirements would be needed. If affects channel any more, ask developer to resubmit to approving agencies. Public Works requires permits from Army Corps, CDFW, and Lahontan. Base flood elevation was done earlier. No elevation was set, but hydraulic analysis

DISTRICT #1
COMMISSIONER
Mary Pipersky

DISTRICT #2
COMMISSIONER
Vacant

DISTRICT #3
COMMISSIONER
Daniel Roberts

DISTRICT #4
COMMISSIONER
Scott Bush

DISTRICT #5
COMMISSIONER
Chris I. Lizza

set one. Grading permit process would control project to not affect channel hydraulics even though short distance from that channel.

OPEN PUBLIC HEARING: Bush noted adjacent house at creek edge also. Any problems? *Heaton said no.*
CLOSE PUBLIC HEARING.

MOTION: Find that project is exempt from CEQA as a Categorical Exemption under CEQA guidelines 15303 & 15305(a) and direct staff to file a Categorical Exemption. Adopt Variance Findings contained in staff report, and approve Variance 16-001 to allow construction of an addition to an existing structure and bridge within required stream setbacks. (Bush/Roberts. Ayes: 4-0.)

B. ONE-YEAR EXTENSION OF TENTATIVE PARCEL MAP 35-35/Triad Holmes Associates Profit Sharing Plan. *Staff: Gerry Le Francois, Principal Planner*

Gerry Le Francois described map extension. State has not granted any further extensions through legislation. Project was approved in 2007. EIR was done, so could move forward with project. No modifications to project conditions. Patel never finished it, so Triad/Holmes took back receivership. Maybe one or two more map extensions this year. Some proponents did not follow through, and maps expired.

Commission approved Burcham Flat projects. What happened? Le Francois described them in holding pattern. Economics was just not there to do improvements, so had to get extensions or let map die. Remainder is parcel without conditions.

Higerd described it as a gray area. Is remainder really a fifth lot? Example: Farm on acreage, splitting four one-acre parcels off one side, what's left is the remainder.

Conditions on remainder later? Le Francois stated that if change configuration, would be new map. Final map has to conform to original. Typically, before 2008, these were consent items, but were put on regular agenda, as questions come up. Why 2007 map coming up now? Maps approved for two years, can apply for three one-year extensions.

OPEN PUBLIC HEARING: No comments. **CLOSE PUBLIC HEARING.**

MOTION: Find that project was processed in accordance with Section 15183 of CEQA guidelines for a project consistent with the General Plan. No substantial changes have been proposed in the project or circumstances under which project will be undertaken, and no new information of substantial importance has been received to warrant further environmental analysis. Approve first one-year extension of Tentative Parcel Map 35-35 to May 10, 2017, subject to prior Conditions of Approval and Mitigation Monitoring Program of May 10, 2017, as shown in staff report. (Bush/Pipersky. Ayes: 4-0.)

--- Break: 10:55 – 11:00 a.m. ---

5. WORKSHOP

A. Transient Rental Overlay Districts (TRODs): Nick Criss described changes to Ch. 25, including changing term Overlay District to Transient Rentals.

Pipersky observed that 25.010 Intent states "no reasonable opposition," but 25.030 on next page says "neighbor support." Should match wording of Intent.

Lizza drafted a detailed Intent clause, citing more reasons than just the demand. Roberts preferred to keep it simple. Pipersky thought it was nice language, but far too broad. Roberts indicated demand was due to the likes of Airbnb. He wanted to make it easy, or people would rent houses anyway.

Criss reminded original concern was that Intent was too broad. Adding workforce housing could be a sticking point. Weiche noted including workforce housing limits possibility to larger homes. People who need support and help likely fit workforce housing.

Definition of workforce housing? Lizza thought housing *traditionally* used as such. No housing exists for new employees in Lee Vining. When applicant comes to Planning Commission, wants to consider workforce housing. No clear line, just case by case. Not remove unit from workforce housing.

If used historically or currently as workforce, what if house were vacant for a year? Criss cited June Lake vacant houses. Set cap percentage for rentals.

Roberts indicated not everyone wants home to be for transient rental; onerous requirements. Some might prefer workforce. Criss thought it more lucrative to rent.

Bush saw reason for change as always financial. Ch. 26 is limiting.

Criss asked, "At what point [is it] not workforce housing anymore?" Lizza stated intent only. Criss asked why rent to workforce if locked in. Lizza saw it as a consideration, not a mandate.

Pipersky questioned allowing it at all. Roberts countered that then people would do it illegally.

Burns opined that locals might rent when away to retain their house. Could limit nights by Use Permit, but how monitor? Bush suggested TOT quarterly to see when rented. Criss wondered if property management collects TOT in lump sum. Airbnb requires 1099 filing, but not VRBO.

Milovich indicated the Town breaks down TOT into number of nights, but not in system if not reported. Unlawful activity goes on. Only solution is to audit, but no staff to do that.

Lizza wanted to give applicants cause to consider these things themselves.

Pipersky asked what's wrong with a petition. Bush stated petition was used repeatedly to stop rentals.

Milovich opined that workforce housing in "Intent" would create confusion or opposition. May create a chilling effect. Need definition. If workforce housing is an issue, address in another chapter.

Bush suggested asking what house has been used for. Burns quoted Housing Element, "Monitor conversion of permanent housing or long-term rental into transient rentals."

Bush thought historic use would determine workforce housing.

Burns noted Use Permit (Type I) has findings, whereas Type II is GPA.

Pipersky saw burden on homeowner, not neighbors. May not know effect till permit is issued. People might not act neighborly.

Criss suggested applicant go to neighbors. Lizza considered show of support a high burden. Roberts recalled applicant garnered neighbor support, yet opposition came from far away. Pipersky thought opposition should come within certain distance from [rental] house.

Lizza contended people want to oppose, not support. Roberts agreed it's harder to find support than opposition. Pipersky preferred a high bar if changing a neighborhood. Lizza thought some might prefer to allow someone to do what they want, neither support nor oppose.

Bush thought if too onerous, might kill legal. Roberts thought neighborhood doesn't change that much where homes are vacant. Bush contended that if you're used to living in quiet place, any disturbance gets noticed. Keep it simple, consider case by case.

Criss noted Type I is Use Permit, which can be revoked; Type II is GPA.

Lizza stated Ch. 26 applies to Types I and II. Criss agreed Ch. 26 is applicable.

Burns stated transient is stricter than regular housing. Take to BOS, then to RPACs when ready, back to Planning Commission for public hearing.

Revised wording of Lizza's proposed Ch. 25 Intent: "In recognition of the growing demand by travelers for alternative lodging. The unpermitted short-term rental uses by property owners to meet this demand, and the difficulties collecting transient occupancy taxes, the Transient Rental designation is intended to provide homeowners with a system that permits them to meet this demand, participate in the sharing economy, and equitably collect local taxes. This designation is intended to protect traditional lodging interests and promote homeowner economic stability. It should be approved only when it promotes community vitality and where adverse impacts that may change the residential characteristics of the neighborhood or the reasonable expectations of adjacent homeowners are minimized."

However, preferred rewording of Ch. 25.010 Intent is: "In recognition of the demand by visitors for diverse lodging options, this chapter is intended to establish a process to permit transient rentals within residential areas that do not exhibit reasonable opposition by neighbors who may be directly affected."

6. REPORTS:

A. DIRECTOR: Maybe skip July 14 meeting, as no public hearings.

B. COMMISSIONERS: No items.

7. INFORMATIONAL: No items.

8. ADJOURN at 12:01 p.m.

Prepared by CD Ritter, PC secretary

**Mono County
Community Development Department
Planning Division**

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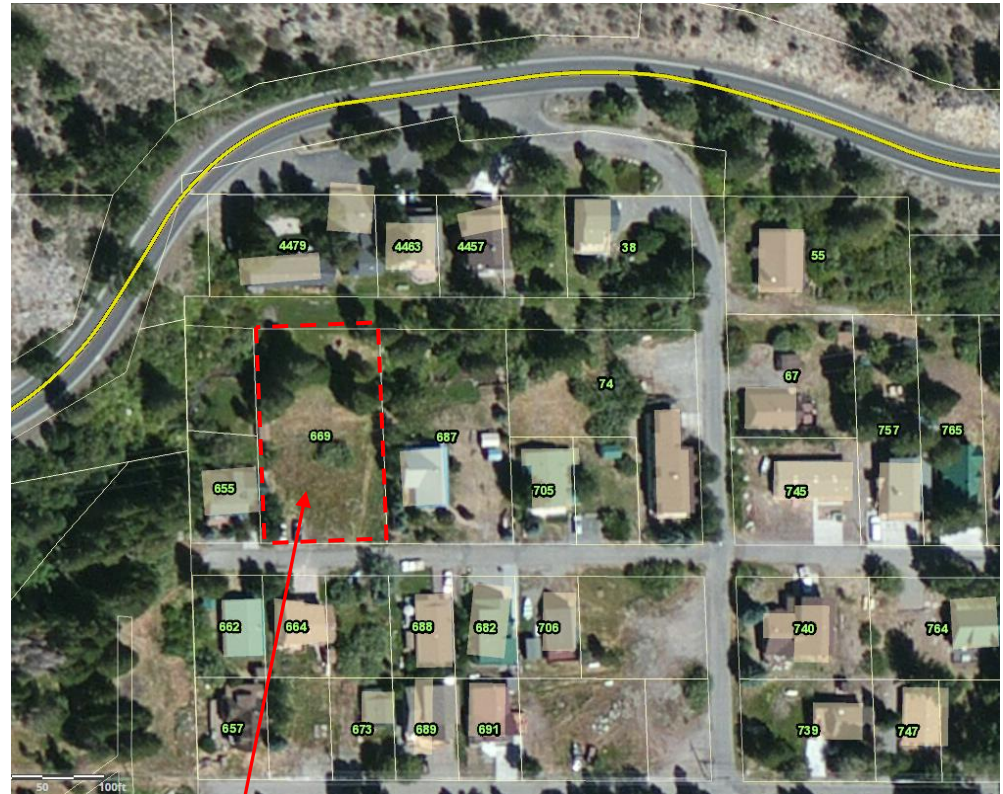
Public Hearing Notice

NOTICE IS HEREBY GIVEN that the Mono County Planning Commission will conduct a public hearing on **Aug. 11, 2016**, in the Board of Supervisors Chambers, Mono County Courthouse, Bridgeport, CA, to consider the following:

10:10 a.m. VARIANCE/Kaytis would reduce the required front-yard setback of 20 feet down to 7 feet for the construction of a single-family residence. Project is located at 669 Garnet Dr. in the community of June Lake (APN 016-202-022). Property is 16,700 sf +/- and has a land use designation of Single-Family Residential (SFR). The property is constrained by Reversed Creek and a utility easement. The project qualifies as a categorical exemption under CEQA guidelines section 15305 (a).

INTERESTED PERSONS may appear before the Planning Commission to present testimony or, prior to or at the hearing, file written correspondence with: Planning Commission Secretary, PO Box 347, Mammoth Lakes, CA 93546. If you challenge the proposed action(s) in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to Secretary to the Planning Commission at, or prior to, the public hearing.

If you would like additional information, please contact the project planner, Gerry Le Francois via email glefrancois@mono.ca.gov or at 760.924.1810.



Subject Property at 669
Garnet Drive, June Lake

Mono County Community Development Dept.
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August 11, 2016

To: Mono County Planning Commission

From: Gerry Le Francois, Principal Planner

Re: Kaytis Variance

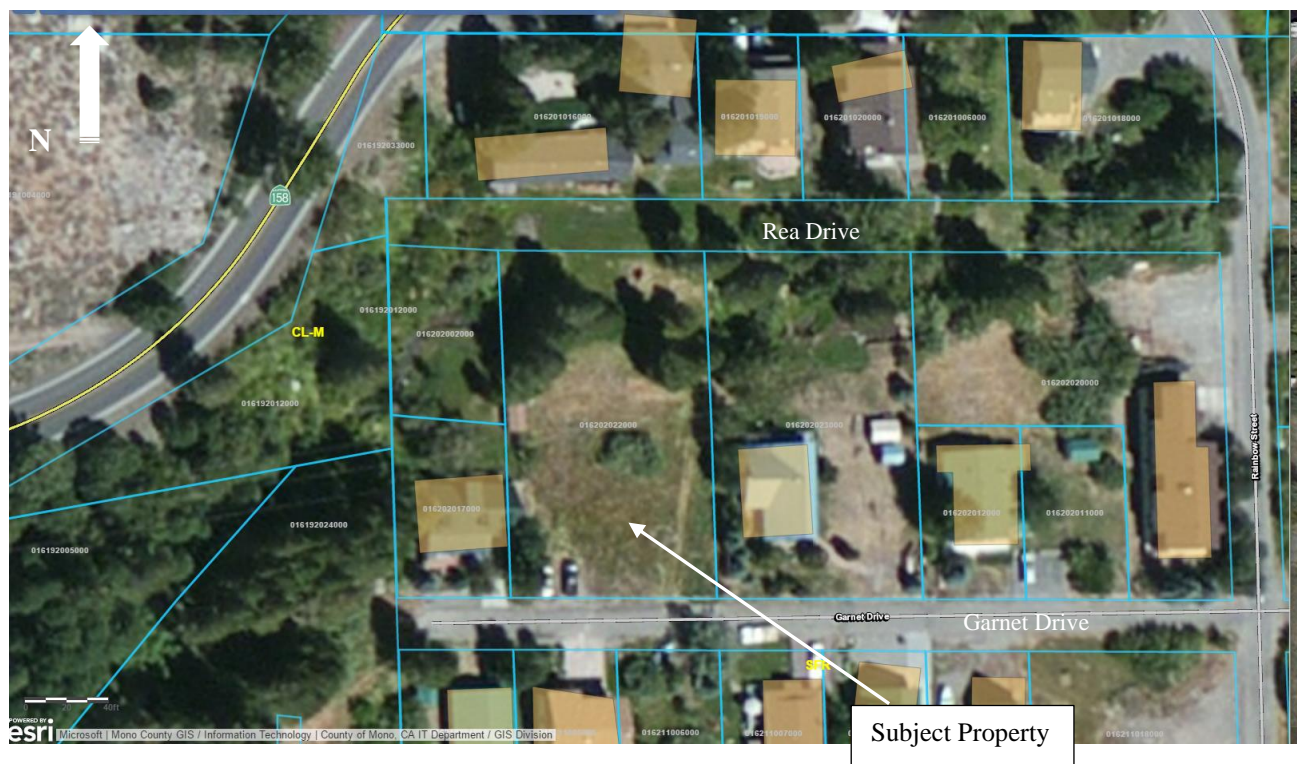
RECOMMENDATION

It is recommended the Planning Commission take the following actions:

1. Find that the project is exempt from CEQA as a Categorical Exemption under CEQA guidelines 15303(a) & 15305(a) and direct staff to file a Categorical Exemption.
2. Adopt the Variance Findings contained in the staff report, and approve Kaytis Variance to allow a) a front-yard setback of seven feet for two deck and roof projections, and b) a building foundation setback of 12.5 feet.

PROJECT

The Kaytis Variance would allow for future construction of a single-family home with a front yard setback of seven feet. The project is located at 669 Garnet Drive in the community of June Lake (APN 016-202-022). The property is +/- 16,579 square feet and has a land use designation of Single-Family Residential (SFR).



The property is bisected by a Southern California Edison (SCE) easement of 70 feet, and Reversed Creek runs through the rear of the property (see Attachments 1 & 2). The SCE easement does not permit construction of new structures and is not enforced by Mono County. But it is a special circumstance of this property. The Mono County General Plan states blue-line streams require a 30-foot setback for new construction. This eliminates a building site along the rear of the property.

The parcel is highly constrained and the applicant is requesting a front-yard setback of 7 feet for two decks and roof projections and a setback of 12.5 feet for the building foundation. Attachments 3 & 4 show the deck and roof area setbacks of 7 feet, and the building foundation at 12.5 feet. The required stream setback and SCE easement limits any suitable building site along the front of the property (Garnet Drive).

Photos from Reversed Creek looking south and southwest.





Overhead lines (70 foot easement) looking north, northeast and adjacent to Garnet Drive.

Middle of subject property looking west.



Eastern property line looking east.



GENERAL PLAN CONSISTENCY

Project requirements of the General Plan for the Kaytis Variance are outlined in the table below. The proposed single-family home complies with all General Plan requirements except the required front-yard setback of 20 feet, which is why a front-yard setback variance is proposed.

Gen Plan requirements	required	proposed
parking	2 spaces (Table 06.010)	2 spaces
lot coverage	Maximum is 40% or 6,631 sf	< 20%
setbacks		
<ul style="list-style-type: none"> side yards 	10 feet – eaves are permitted to extend into any yard by 30 inches (04.120 G.1)	10 feet – with 30-inch eave encroachment along eastern property line
<ul style="list-style-type: none"> rear yard 	double frontage lot - 20 feet (04.120 E.2)	> 20 feet
<ul style="list-style-type: none"> front yard 	20 feet (Table 04.120)	Variance for front yard setback reductions to: <ol style="list-style-type: none"> 7 feet for deck and roof eaves building foundation at 12.5 feet
<ul style="list-style-type: none"> stream setback 	30 feet from top of bank (04.120 F.1 b)	> 30 feet

Section II of the General Plan, Land Use Element, **04.120 Yards**, states that a front-yard setback of 20 feet is required in the Single-Family Residential land use designation.

In order to deviate from this setback, a variance must be approved. A variance is a permit issued to a landowner by an administrative agency, in this case the Planning Commission, to construct a structure or carry on an activity not otherwise permitted under the land use designation. The statutory justification for a variance is that the owner would otherwise suffer unique hardship under the general land use regulations because his or her parcel is different from the others to which the regulation applies due to size, shape, topography, or location.

The concept is not that the basic land use designation is being changed but that the property owner is allowed to use his property in a manner basically consistent with the established regulations with such minor variations that will place him in parity with other property owners in the same designation. All of the required findings specified in Mono County General Plan Chapter 33.010 A-D must be made in order to issue a variance.

LAND DEVELOPMENT TECHNICAL ADVISORY COMMITTEE

Kaytis Variance was reviewed by LDTAC members. Standard conditions of approval have been incorporated into the variance conditions of approval.

ENVIRONMENTAL REVIEW

This variance would qualify for a Class 3 Categorical Exemption CEQA Guidelines 15303(a) for "New Construction or Conversion of Small Structures," and Guidelines 15305(a) "Minor Alterations in Land Use Limitations." These exemptions allow construction of one single-family residence, including a garage.

CEQA Guidelines 15303. New Construction or Conversion of Small Structures

Class 3 consists of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:

- (a) *One single-family residence or a second dwelling unit in a residential zone. In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.*

CEQA Guidelines 15305. Minor Alterations in Land Use Limitations

Class 5 consists of minor alterations in land use limitations in areas with an average slope of less than 20%, which do not result in any changes in land use or density, including but not limited to:

- (a) Minor lot line adjustments, side yard, and setback variances not resulting in the creation of any new parcel.*

VARIANCE FINDINGS

The Planning Commission can approve a variance based only on the provisions of the General Plan and only when all of the findings can be made:

1. *Because of special circumstances (other than monetary hardship) applicable to the property, including its size, shape, topography, location or surrounding, the strict application of the provision of this title deprives such property of privileges (not including the privilege of maintaining a nonconforming use or status) enjoyed by other property in the vicinity and in an identical land use designation because:*

The property is significantly constrained by the SCE easement of 70 feet across the center of the property, and the setback requirement of 30 feet from the top of the bank along Reversed Creek. This limits any suitable building site adjacent to Garnet Drive as shown in Attachment 2.

2. *The granting of a variance will not constitute a special privilege inconsistent with the limitations upon other properties in the vicinity and in the land use designation in which the property is situated because:*

The surrounding area is designated Single- Family Residential and the proposed home is similar to surrounding development. Due to the setback constraints of the parcel (SCE easement and Reversed Creek), the applicant has asked for a front yard setback variance to allow them to develop their property in a manner that is consistent with the established surrounding parcels.

The variance permit process provides the public the opportunity to comment on the proposed setback reductions. Following a notice to surrounding property owners, one comment to date has been received in opposition to the variance.

3. *The granting of a variance will not be detrimental to the public welfare or injurious to property or improvements in the area in which the property is situated because:*

The property is located in a single-family residential area and the proposed project would be consistent with adjoining residential development. The project maintains stream setbacks and recognizes the setback from utility lines. The variance permit process provides the public the opportunity to comment on the proposed setback reductions. To date, one comment has been received in opposition to the variance.

4. *The granting of a variance will not be in conflict with the established map and text of the general and specific plans and policies of the county because:*

June Lake Area Plan

- 1) *Land Use, Objective C, Policy 13.C.1. states: Encourage compatible development in existing and adjacent to neighborhood areas.*

The project is a permitted use for the SFR land use designation and will be compatible with the surrounding uses that are also designated SFR.

- 2) *Land Use Objective E, Policy 13.E.1. states: Encourage infilling and/or revitalization in areas designated for development in the Area Plan.*

The proposed project lies infills an existing subdivision and will be compatible with the surrounding uses that are also SFR.

- 3) *Policy 18.A.1. Mitigate impacts or limit development to an appropriate level in environmentally and visually sensitive areas. Environmentally sensitive areas include: riparian areas, potential high groundwater table zones, wetlands, and steep hill slopes.*

The future home is located along Garnet Drive and approximately 54 feet from Reversed Creek.

MONO COUNTY

Planning Division

NOTICE OF DECISION / VARIANCE

VARIANCE #: _____

APPLICANT: Kaytis Revocable Trust

ASSESSOR PARCEL NUMBER: 016-202-022

PROJECT TITLE: Variance Kaytis – Reduction in a front-yard setback

PROJECT LOCATION: 669 Garnet Drive in June Lake

On August 11, 2016, a duly advertised and noticed public hearing was held, and the necessary findings, pursuant to Chapter 33, section 33.010 of the Mono County General Plan, were made by the Mono County Planning Commission. In accordance with those findings, a Notice of Decision is hereby rendered for **Kaytis Variance** subject to the following conditions:

DRAFT CONDITIONS OF APPROVAL

1. Kaytis Variance shall be in substantial compliance with the project Attachment 4 and project description. A portion of the deck and roof areas shall be a minimum of 7 feet from the front property line. The building foundation shall be a minimum of 12.5 feet from the front property line.
2. Project shall provide a will-serve letter from the June Lake PUD.
3. Project shall provide a will-serve letter from the June Lake FPD.
2. Project shall comply with any required permits from Public Works Department.
3. Project shall comply with any required permits from the Building Division.
4. Best management practices, as required by the Building Division and/or the Public Works Department, shall be required and implemented.

DATE OF DECISION: August 11, 2016

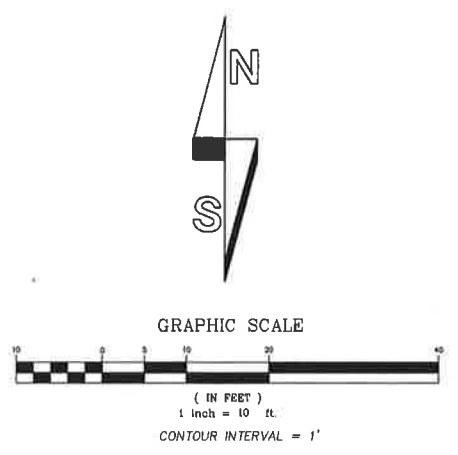
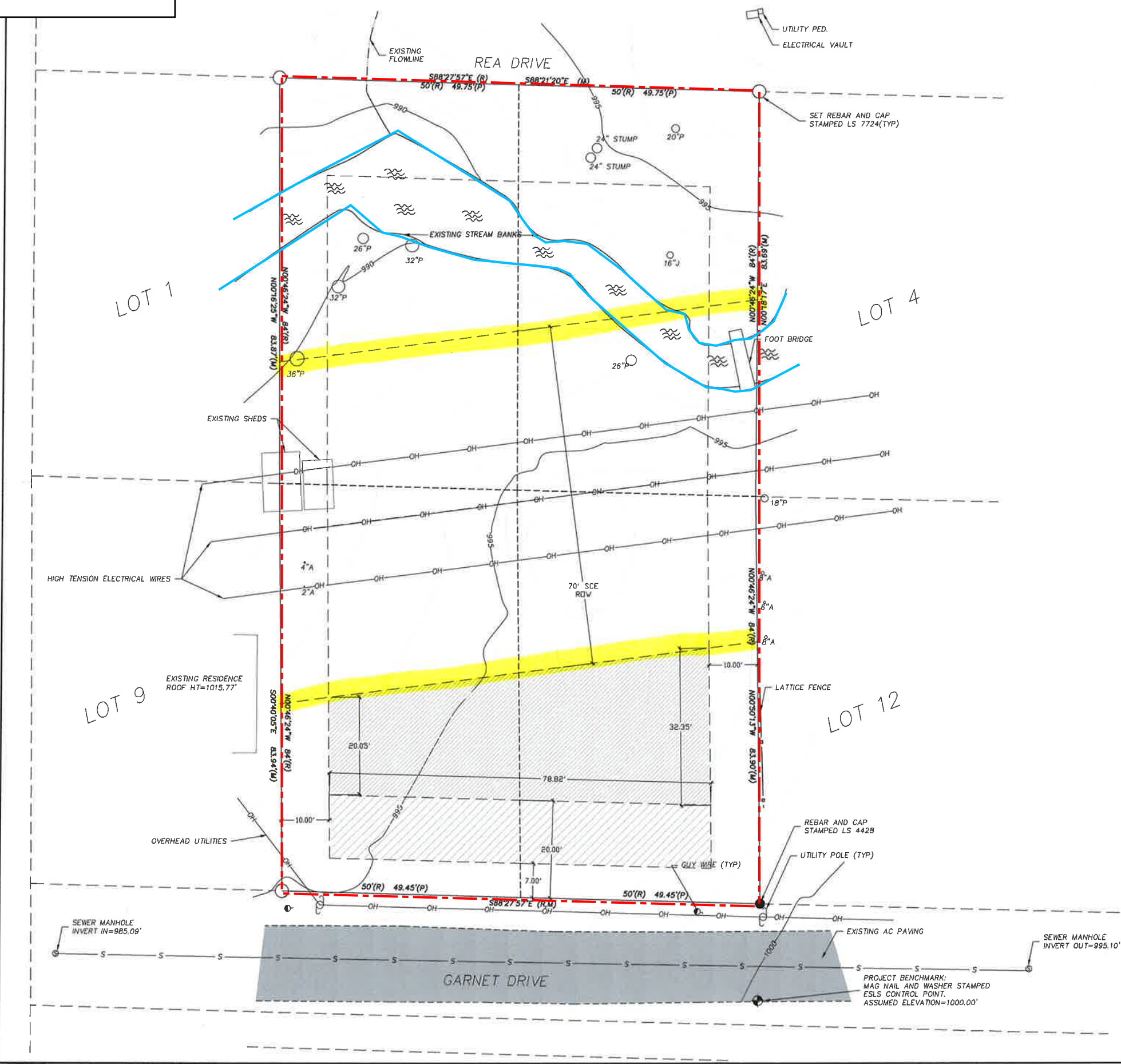
Ongoing compliance with the above conditions is mandatory. Failure to comply constitutes grounds for revocation and the institution of proceedings to enjoin the subject use.

MONO COUNTY PLANNING COMMISSION

DATED: _____

Staff Signature

cc: Applicant
 Engineer
 Assessor's Office
 Compliance Specialist



RECORD INFORMATION

(R) RECORD INFORMATION PER MB 1/B

TREE LEGEND

- EXISTING TREE AND DIAMETER
- A=ASPEN
- 16\"/>

SITE INFORMATION

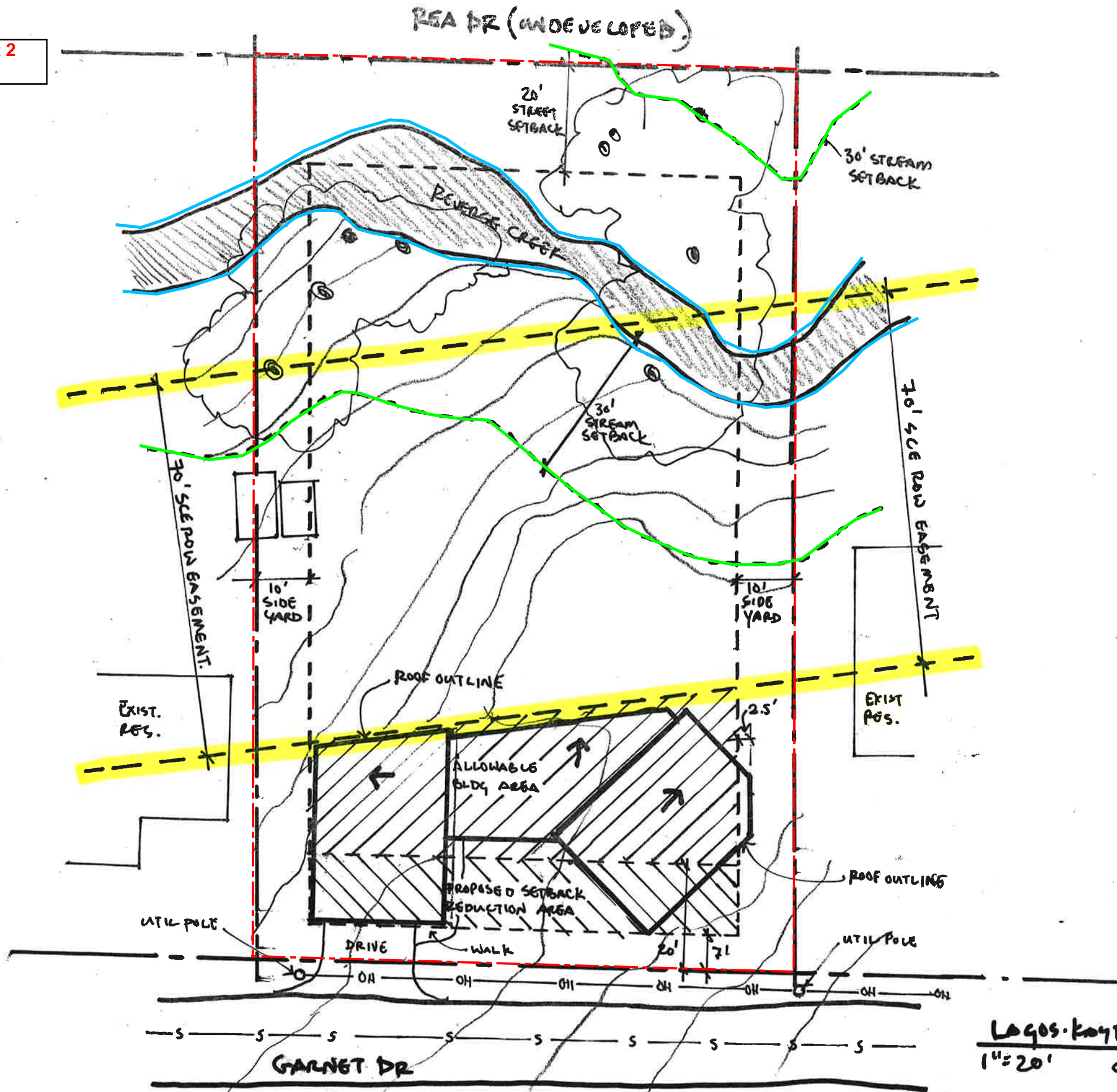
LOTS 2,3,10,11 SILVER LAKE PINES 2,
PETERSON TRACT
MB 1/B
16,579± SQ. FT. 0.38 AC.

I HEREBY STATE THAT I AM A LICENSED LAND SURVEYOR OF THE STATE OF CALIFORNIA, THIS MAP REPRESENTS A SURVEY MADE BY ME IN NOVEMBER 2012, THE RECORD BOUNDARY INFORMATION SHOWN HEREON IS COMPILED FROM MAP BOOK 1, PAGE 8, LOCATED IN THE MONO COUNTY RECORDERS OFFICE. THIS MAP DOES NOT INCLUDE EASEMENTS EXCEPT THOSE SPECIFICALLY DELINEATED HEREON.

BOUNDARY AND TOPOGRAPHIC SURVEY
 LOTS 2,3,10,11, Block 5, SILVER LAKE PINES 2
 PREPARED FOR: MONICA AND CLAY LAGO-KAYTIS

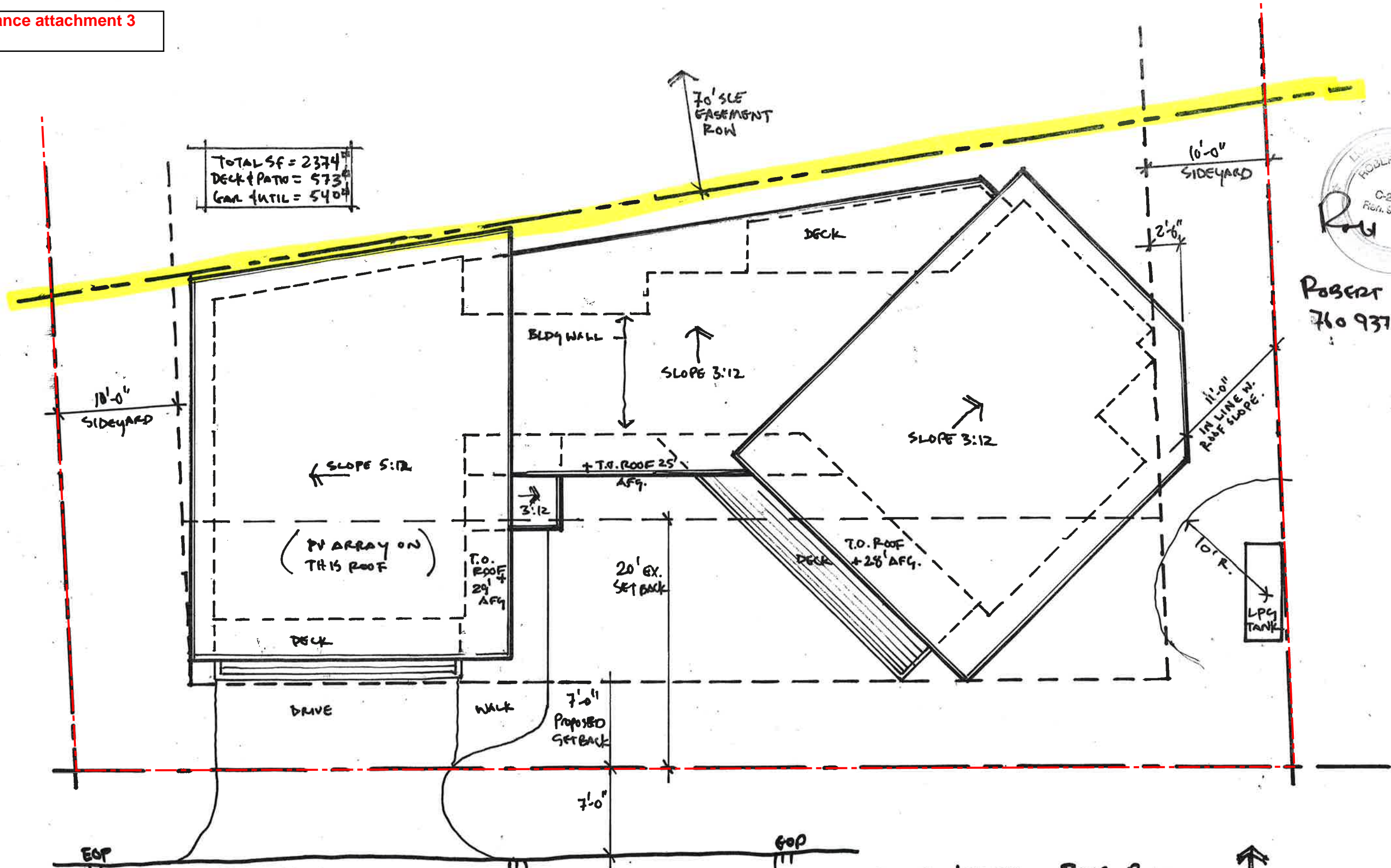
Eastern Sierra Land Surveys, inc.
 14 Chase Ave.
 Bishop, CA 93311
 19 Shinnick Cir.
 Silver Lake, CA 92676

Date:	11/9/12	Scale:	1"=10'
Job No.:	12-052	Drawn by:	LS
Client:	MONICA AND CLAY LAGO-KAYTIS	Checked by:	LS
Sheet:	1	of 1	



Robert Cressy
760 937-2600

Lagos Kaytis - SITE PLAN
1"=20' CP 7.20.2016



TOTAL SF = 2374
DECK + PATIO = 573
GAR UTIL = 5404



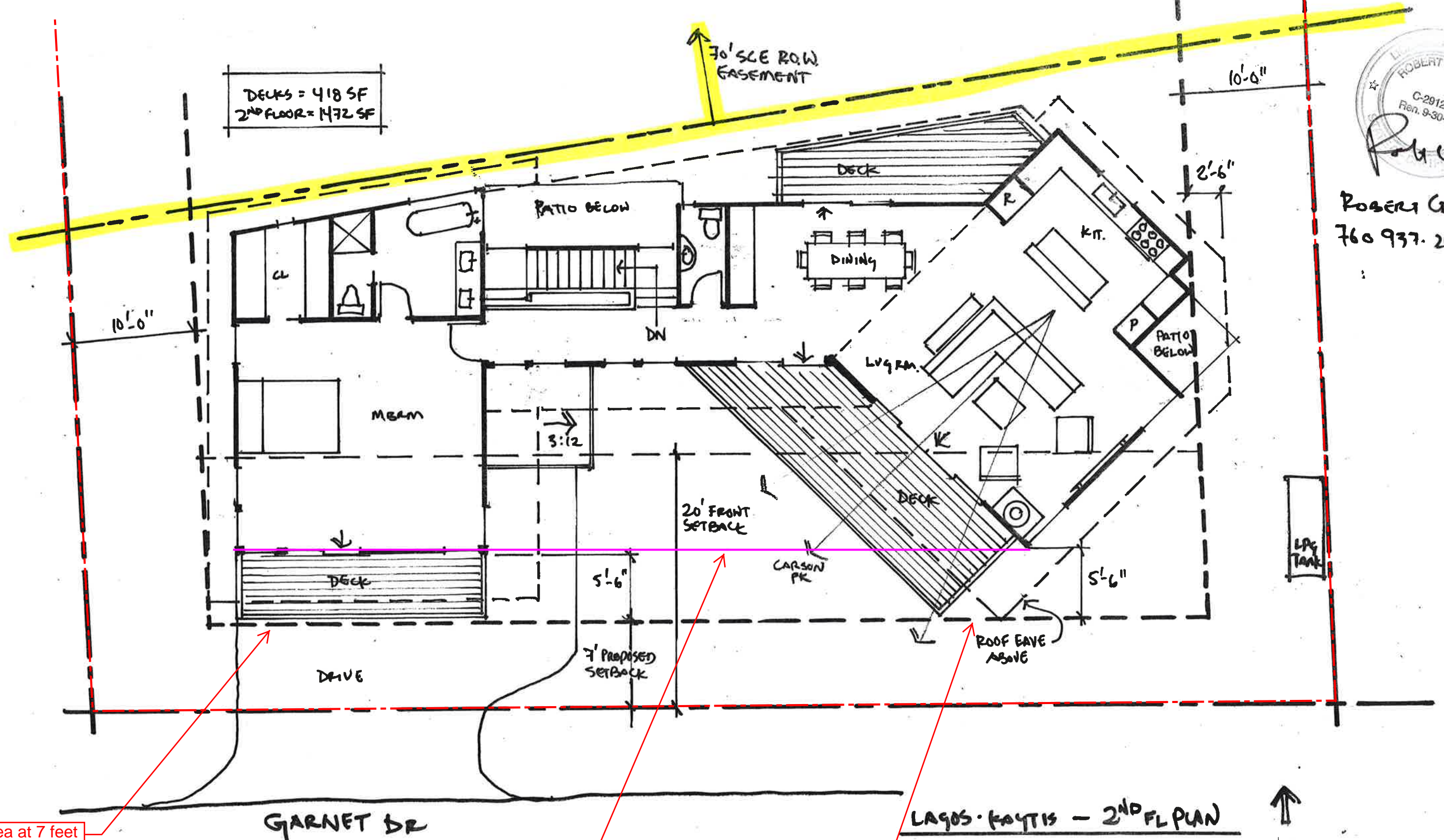
ROBERT CRANSY
760 937-2600

Lagos Kaytis - Roof Plan
1/8" = 1'
CP 7.20.2016





ROBERT CREAMY
760 937-2600



DECKS = 418 SF
2ND FLOOR = 1472 SF

70' SLE ROW
EASEMENT

10'-0"

10'-0"

2'-6"

PATIO BELOW

DECK

DINING

KIT.

PATIO BELOW

DN

MEAN

3:12

LPG TANK

DECK

20' FRONT
SETBACK

CARSON
PK

5'-6"

ROOF EAVE
ABOVE

DECK

5'-6"

7' PROPOSED
SETBACK

DRIVE

GARNET DR

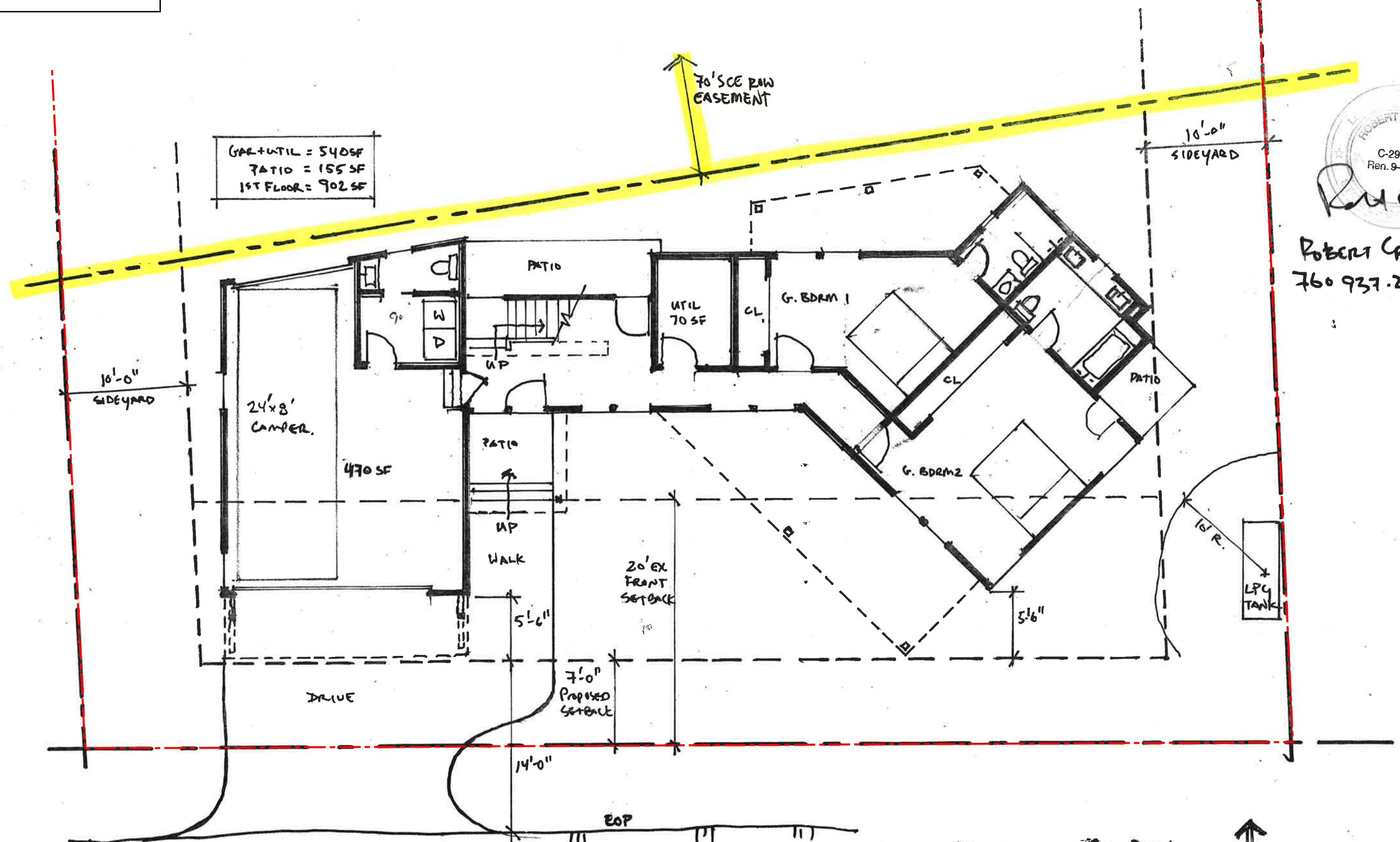
LAGOS · KAYTIS - 2ND FL PLAN
1/8" = 1' CP 7.19.2016



Deck area at 7 feet
from property line

Building foundation at
12.5 feet from property
line

Deck and roof area at 7
feet from property line



GAR+UTIL = 540 SF
 PATIO = 155 SF
 1ST FLOOR = 902 SF



Robert Creasy
 760 937-2600

LAGOS-KAYTIS 1ST FL PLAN
 1/8" = 1' CP 7.19.2016



GARNET DR.

EOP

LPG TANK

70' SCE ROW EASEMENT

10'-0" SIDEYARD

10'-0" SIDEYARD

24'x8' CAMPER.

470 SF

UTIL 70 SF

G. BDRM 1

G. BDRM 2

PATIO

PATIO

PATIO

UP WALK

20' EX FRONT SETBACK

7'-0" Proposed SETBACK

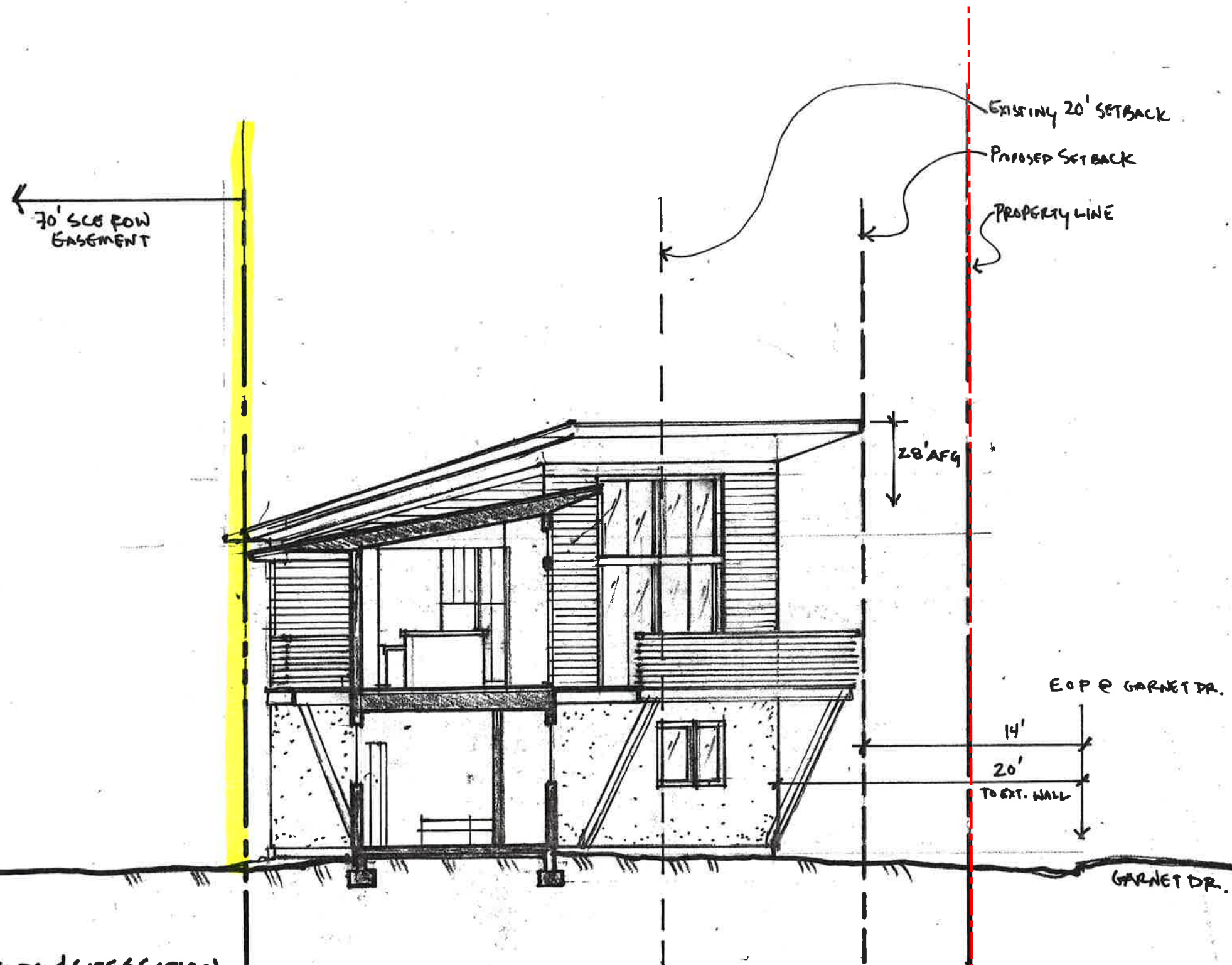
DRIVE

14'-0"

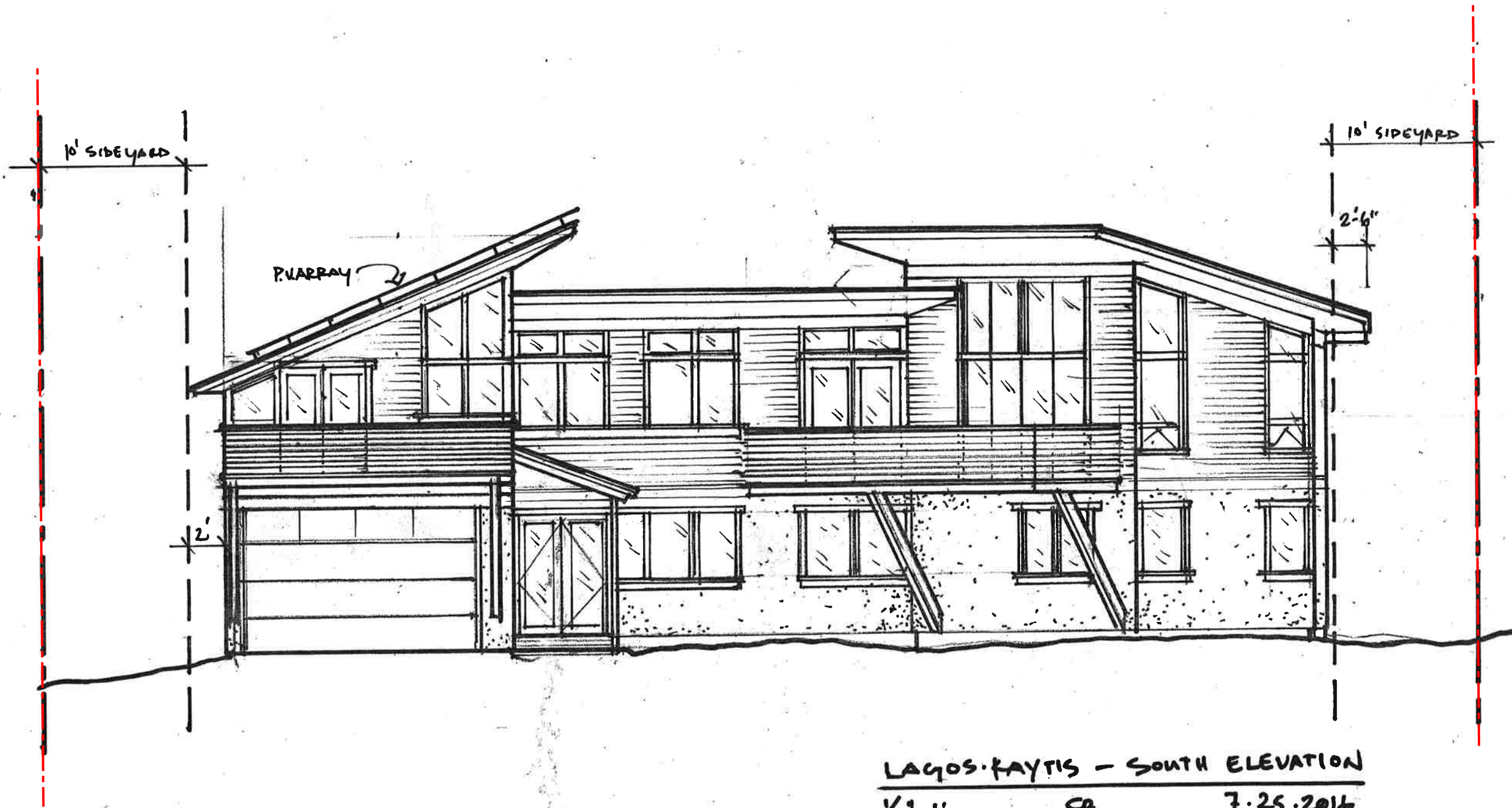
5'-6"

5'-6"

15' R.



LAGOS-FAYTIS - BLDG & SITE SECTION
1/8" = 1' CP 7.25.16



LAGOS KAYTIS - SOUTH ELEVATION
 $\frac{1}{8}'' = 1'$ CP 7.25.2016

Subject: FW: variance in siver lake pines tr 11

RECEIVED
AUG 04 2016
MONO COUNTY
Community Development

-----Original Message-----

From: junelakechef@earthlink.net [mailto:junelakechef@earthlink.net]

Sent: Thursday, August 04, 2016 9:23 AM

To: Gerry LeFrancois <glefrancois@mono.ca.gov>

Subject: variance in siver lake pines tr 11

dear sir (Gerry) we the people that have houses in this area have a lot of questions about this project . the planning

division has given us little to no time to discuss this . these streets are very small and narrow , Manny of the folks are not around , or live elsewhere . its bound to snow again !!! and many more . we (I) feel this is being fast tracked as they know it's illegal . you must slow this down !!!!! we have the right to discuss this and ask questions

Thanks you very much Richard Freeman

silver lake pines track 11 (peterson track) 760 709 6817 (junelakechef@earthlink.net)

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Planning Division

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August 11, 2015

To: The Mono County Planning Commission

From: Wendy Sugimura, Associate Analyst
Scott Burns, Director

Re: Develop Mono County Comments on the Inyo National Forest Plan Revision & Draft Environmental Impact Statement

RECOMMENDATIONS

1. Discuss comment framework and Board of Supervisors' feedback, and provide any further recommendations to the Board to consider incorporating into the final letter.

FISCAL IMPACT

No direct impacts.

DISCUSSION

The Board of Supervisors will receive a presentation on the Inyo National Forest Plan (INF Plan) update and Draft Environmental Impact Statement (DEIS) on August 9, and will discuss initial topics and issues to include in a comment letter. The Planning Commission will be provided with the draft comment framework and Board feedback at their meeting on August 11.

The framework was initially based on past Board discussion, and input from the Lee Vining Regional Planning Advisory Committee, June Lake Citizen's Advisory Committee, and other stakeholders such as the Eastern Sierra Council of Governments (ESCOG; see attachment 1). In addition, some individuals and organizations have sent their respective comments on the INF Plan to the Board of Supervisors, and those letters are also attached (see attachment 2).

The Commission is requested to discuss this information and provide any further recommendations for the Board to consider incorporating into the final County comment letter. A draft of the comment letter is expected to be presented to the Board for final refinement at the August 16 meeting.

Please contact Wendy Sugimura at 760.924.1814 or wsugimura@mono.ca.gov with any questions.

ATTACHMENTS

1. ESCOG comments
2. Comments transmitted to the Board from individuals and organizations on the INF Plan

The Inyo National Forest Management Plan Revision Process: Recreation and the Eastern Sierra Council of Governments (ESCOG)

Recreation has been identified as one of four areas of policy focus for the Eastern Sierra Council of Governments (ESCOG) for 2016. Since recreation primarily takes place on the public lands of the region, it is important that ESCOG participate in the current management plan revision process for the Inyo National Forest. The public comment period for the "Draft Revised Land Management Plan for the Inyo National Forest" closes on August 25, and at its June meeting, the ESCOG identified a need to provide recommendations to member agencies regarding recreation.

Inyo National Forest Plan Revision: Background and Summary

The following is an edited summary from the overview guide to the Draft Environmental Impact Statement and Draft Forest Plans Inyo, Sequoia and Sierra National Forests. Read the full overview and the DEIS here: <http://tinyurl.com/r5earlyadopters>.

- “Every national forest managed by the Forest Service is required to have a land management plan, or forest plan, by the National Forest Management Act of 1976 and other laws. Forest plans guide management of National Forest System lands, but do not compel any action, authorize projects or activities, or guarantee specific results.
- “The USFS is revising the Inyo, Sequoia and Sierra National Forests' plans because they are more than 20 years old. Economic, social, and ecological conditions have changed since they were written; new laws, regulations and policies are in place; and new information based on monitoring and scientific research is now available.
- “There are **three main natural resource topics**, including **fire management**, **ecological integrity**, and **sustainable recreation and designated areas**. The alternatives in the draft EIS vary in the ways they address these important issues.
- “The purpose of revising these forest plans is to: reduce risk of large high-intensity wildfires to communities, recreation sites and infrastructure; increase ability to manage wildfires to meet resource objectives and reduce smoke impacts to communities; restore the resilience of vegetation and aquatic and riparian ecosystems; restore wildlife and plant habitat and diversity; reduce risk of large high-intensity wildfire to wildlife and their habitats; provide sustainable and diverse recreation that considers demographics, reflects local communities desires, avoids overcrowding and use conflicts, minimizes resource damage and protects cultural resources; update management of wilderness, wild and scenic rivers, and the Pacific Crest National Scenic Trail.”

Recreation Focus and the Eastern Sierra Recreation Collaborative

The Eastern Sierra Recreation Collaborative (ESRC), funded by a grant from the National Forest Foundation, has held a series of public meetings to gather recreation-focused citizen feedback for the planning process. ESRC identified a preliminary selection of citations from the "Draft Revised Land Management Plan for the Inyo National Forest" that may be consistent with the ESCOG's intent. They are listed for the ESCOG's discussion, consideration and possible recommendation to member agencies for their comment and support, and are grouped in the following five categories that are specific to opportunities for sustainable recreation:

1. Volunteers/Interpretation/Partnerships/Stewardship

- a. Increase stewardship capacity by expanding partnership and volunteer opportunities outside of appropriated funds.

2. Digital Connection/Technology

- a. Modernize the agency's use of emerging communication channels to capture live-time data and improve quality of data collected.

3. Responsive Special Use Permits

- a. Enhance guest services and connections to public lands by streamlining and updating the issuing of special use permits.

4. Citizens Access/Trails

- a. Turn attention to developing sustainable systems for access including trails, OHV and OSV use.

5. Recreation Places / Iconic Places

- a. Better engage gateway partners by developing allocation criteria for recognizing and managing special places beyond those designated by Congress or the President.

Volunteers/Interpretation/Partnerships/Stewardship

1. “Develop memoranda of agreements or other protocols between the forest and local governments as appropriate to guide coordination processes and reflect local perspectives and interests.” Page 89
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 93 – Local Communities)*
2. “Maintain and expand contracting and partnership opportunities with local governments, businesses and organizations. Develop partnerships that leverage different sources of funding to support opportunities to contribute to the economic and social sustainability of local communities.” Page 90
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 94 – Volunteers/Interpretation/Partnerships/Stewardship)*
3. “The forest should designate a partnership coordinator who will define an easily understood process for becoming a partner as well as expectations for both the forest and the partner.” Page 147
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 151 – Appendix C: A Renewed Partnership Focus for the Inyo National Forest)*
4. “Install and maintain appropriate multilingual information boards, interpretive panels and regulatory signs at developed sites and dispersed areas within sites of sensitive resources.” Page 153
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 157 – Appendix D: Management Strategies)*

Digital Connection/Technology

1. “Work with local governments, businesses, and organizations to collect economic data to track changes for businesses in sectors dependent on forest activities.” Page 90
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 94 – Local Communities – LOC-FW-GOAL 03)*
2. “Regularly report potential projects suitable for partnership and volunteer opportunities to the public.” Page 91
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 94 – Volunteers/Interpretation/Partnerships/Stewardship –VIPS-FW-GOAL 02)*
3. “To the extent practical, harmonize recreation direction for forest visitors to minimize confusion when crossing administrative boundaries.” Page 91
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 95 – Sustainable Recreation – REC-FW-GOAL 02)*

4. “Provide and update interpretive signage, wayside exhibits, publications and programs using a variety of media and methods.” Page 94
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 98 – Potential Management Approaches)*
5. “Explore partnership opportunities with user groups and seek reliable information sources outside of the agency to improve data collection and data management on recreation use and demand.” Page 144
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 148 – App B: Proposed and Possible Actions – Sustainable Recreation)*

Responsive Special Use Permits

1. “Permitted recreation uses, such as recreation special events or guided activities, are consistent with recreation settings, protect natural and cultural resources and support community goals.” Page 39
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 43 – Sustainable Recreation – REC-FW-DC 11)*
2. “Work with local governments, businesses and organizations to assist in permit processes, including providing technical assistance, processing programmatic environmental clearance, and other measures to streamline the time and expense of permitting.” Page 143
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 147 – Appendix B: Proposed and Possible Actions – Local Communities)*
3. “Issue and supervise permits for new special use activities on the forest including powerlines, special events, large group gatherings, outfitter-guide activities and research.” Page 144
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 148 – Sustainable Recreation – REC-FW-DC 11)*
4. “Expand partnerships with other federal, state, and local government agencies, as well as associations, non-government organizations, outfitters and guides, local businesses, and other community groups, to leverage information (help serve as messengers to the visiting public) and resources for mutual benefit to enhance and improve forest infrastructure (i.e. roads, trails, campgrounds)” Page 147
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 151 – Appendix B: Proposed and Possible Actions – Sustainable Recreation)*

Citizen Access/Trails

1. “The diverse landscapes of the forest offer a variety of year-round recreation settings for a broad range of nature-based recreation opportunities, derived from assigned recreation opportunity spectrum classes and recreation places

management areas. Management focuses on settings that enhance the forest recreation program niche.” Page 38

- a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 42 – Sustainable Recreation – REC-FW-DC 01)*
2. “Visitors can connect with nature, culture and history through a full range of inclusive and sustainable outdoor recreation opportunities.” Page 39
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 43 – Sustainable Recreation – REC-FW-DC 04)*
3. “The trail system provides a variety of motorized and non-motorized recreational opportunities during summer and winter and distributed across the forest. Trails access destinations that provide for loop opportunities that also connect to a larger trail system, provide linkage from local communities to the forest and are compatible with other resources.” Page 39
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 43 – Sustainable Recreation – REC-FW-DC 15)*
4. “Work with partners and volunteers to provide recreation opportunities, maintain and enhance recreation settings, collect and manage data on recreation use and demand, and contribute to socioeconomic benefits associated with recreation and tourism.” – Page 90
 - a. *(Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 94 – Volunteers/Interpretation/Partnerships/Stewardship – VIPS-FW-GOAL 04)*

Recreation Places / Iconic Places

ESRC recommends that ESCOG member agencies take a close look at the “desired conditions” statements on the pages listed below for each of the recreation/iconic places that are in or near their jurisdictions.

1. Benton-Casa Diablo Place – Page 68
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 72*
2. Bishop to Convict Creek Place – Page 69
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 73*
3. Coyote Place – Page 70
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 74*
4. Glass Mountain Place – Page 70
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 74*
5. Golden Trout-South Sierra Place – Page 71
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 75*
6. Inyo Mountains Place – Page 71
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 75*
7. June Lake Loop-Walker-Parker Place – Page 72
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 76*
8. Mammoth Place – Page 73
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 77*

9. Mammoth Escarpment Place – Page 73
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 77*
10. Mono Basin-Lee Vining Place – Page 75
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 79*
11. Owens River Headwaters Place – Page 76
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 80*
12. Owens Valley Escarpment Place – Page 76
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 80*
13. Pizona Place – Page 77
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 81*
14. Reds Meadow-Fish Creek Place – Page 77
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 81*
15. Upper Owens River Place – Page 78
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 82*
16. White Mountains Place – PDF Page 83
 - a. *Draft Revised Land Management Plan for the Inyo National Forest - PDF Page 87*

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Planning Team Leader
Forest Plan Revision
1839 South Newcomb Street
Porterville, CA 93257

Dear Planning Team Leader,

Thank you for your consideration of my input on the Draft Forest Management Plan for the Inyo National Forest. I have lived in the Eastern Sierra since 1980 because of the recreation, scenery, and diverse wildlife in my backyard: the Inyo National Forest.

Over the years, I have submitted my comments on the various Draft Plans that have been up for review. I continue to support protection of endangered and threatened plant and animal species through special habitat designation. I support wilderness designation for all thirteen proposed areas: (1) Deadman Canyon; (2) Deep Springs North; (3) Piper Mountain Addition 1; (4) Piper Mountain Addition 2; (5) Soldier Canyon; (6) Inyo Mountain Wilderness Addition; (7) South Sierra Addition East 1; (8) White Mountain Addition East; (9) White Mountain Addition West; (10) Dexter Canyon; (11) Excelsior; (12) Glass Mountain; and (13) Ansel Adams Addition. Please also add the following streams to the list of waters worthy of protection under the Wild and Scenic Rivers Act: Dexter Canyon and Wet Canyons, S. Fork Birch Creek, O'Harrel Canyon Creek and the lower reaches of restored Mono Lake tributaries Rush, Parker and Walker.

With the impacts of global warming, and as a victim of the Round Fire in 2015, I am acutely concerned with the increase in catastrophic wildfires on the forest. The new Inyo plan provides an opportunity for the Forest Service to update its approach to managing fire to better protect our forests and our communities. Science has shown that the way to lessen the risks associated with forest fires is actually to allow for natural fires and purposeful controlled burns, and to proactively create defensible space around homes and human communities. Logging large trees does not reduce the threat of fire. Large, mature trees provide important habitat. The Forest Service should protect all large trees that are 24 inches in diameter or larger. Our communities will be safer and our forests healthier if the Forest Service emphasizes the removal of surface fuels and brush and small trees that help spread fires into the forest canopy.

Finally, I am worried about the increase in ORV use in the front country of the Inyo Forest. On the federal lands surrounding our community, there has been a proliferation of motorized vehicles going off designated roads and damaging the natural resources. I support greater emphasis on managing all our remaining roadless areas to protect their wild, non-motorized character.

I appreciate the time and effort that went into this Draft Plan but I support a stronger, more science-based plan that will more fully protect the Inyo National Forest and provide: 1) high quality outdoor recreation; 2) protected habitats for fish, wildlife and plants, 3) additional wilderness and wild rivers, and 4) additional community and ecosystem protections through a more natural role for fire in our national forest.

Thank you,

Jeanne Oakeshott

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Begin forwarded message:

From: Sharon Clark <sharonr.clark@gmail.com>
Date: July 29, 2016 at 8:50:42 AM MST
To: <skendall@mono.ca.gov>
Subject: Inyo National Forest Draft Revised Management Plan

Honorable Mono County Board of Supervisors,

As you prepare your letter to the Forest Service, I hope you will consider my two concerns for preserving wild critters and wild places in Mono County.

Each one of us has a special place, a particular spot that beckons us to toss worldly cares aside and flee far away to find peace. Sometimes, this place is close by. The peace found in our special place replenishes our very soul, revives hope and renews our passion to protect it forever for others. Its name says it all: Solitude Canyon. This approximately 800 acres could easily be added to the John Muir Wilderness. As you hike down the canyon the views are magnificent. The rock formations at the bottom are just plain fun, especially for grand children. This 'solitude', this peace, is within hiking distance of Mammoth Lakes town limits, the Lakes Basin and lies ***within Mammoth Lakes urban boundary!*** How cool would it be to brag that we have actual real *wilderness* within our town of Mammoth Lakes!

About 75 years ago on my grandpa's Texas ranch, I was ecstatic about Bob-whites which were plentiful. We children "whistled" their call and when the bird "whistled" a response, we were

thrilled; we were "communicating" with wild birds. Today, when I visit relatives' Texas ranches, there is nary a Bob-white "whistle" to be heard. My brother assures me that they are trying to reintroduce Bob-whites. Loss of species distresses me, especially for my grand children who might be denied opportunities to see any wild critters. Please consider supporting a Wilderness recommendation for the Glass Mountains to protect Sage Grouse and Northern Goshawk, Dexter Canyon for the Black-backed wood pecker, Excelsior for Bi-state Sage grouse and Horse Meadow (Ansel Adams Addition) for big horn sheep. Wilderness WILL PROTECT species for generations to come. Please protect these lands and their habitat. Please don't allow our native wild creatures to go the way of Bob-whites. Once lost, they are gone forever.

Thanks much for reading,
Sharon Raven Clark



*Range of Light Group
Toiyabe Chapter, Sierra Club
Counties of Inyo and Mono, California
P.O. Box 1973, Mammoth Lakes, CA, 93546
Rangeoflight.sc@gmail.com*



August 3, 2016

Dear Mono County Board of Supervisors,

This is a follow-up to our letter in June concerning the DEIS (Draft Environmental Impact Statement) and Inyo National Forest Draft Land Management Plan which when approved will update and replace the 1988 Inyo National Forest management plan.

The Range of Light Group (Toiyabe Chapter, Sierra Club) has about 360 members roughly equally split between Mono and Inyo County. Our group for many years has offered summer and winter outings weekly for nine months of the year. We also have a general meeting, usually with an educational presentation, on the 3rd Tuesday of each month. Our third area of activity is responding to various environmental and conservation issues which impact one or both of our two counties. Our members use the Inyo Forest for back country and day hiking, back country pack trips, skiing (especially cross-country), snowshoeing, photography, birding, plant viewing, fishing, landscape viewing, learning about the history and cultural resources of the areas, fellowship with each other, volunteer activities such as restoration projects, and mental and physical nourishment. Individually some of our members engage also in responsible OHV, OSV biking, horseback riding and other activities.

As you know, the Inyo National Forest plan revision is one of early adapter plans under the 2012 Forest Planning rules – the other two being the plans for the Sierra and Sequoia National Forest. The recently released DEIS is a joint DEIS for all three Forests accompanied by separate draft management plans for each of the three forests. There are also many supporting documents covering individual topics (e.g., Species of Conservation Concern, Air Quality, Fire, etc.)

For the last four years we have actively followed the revision plan process for the Inyo National Forest, including attending local meetings offered by the Forest Service, attending the Sierra Cascades Dialogue meetings offered by Region 5 of the Forest Service which have provided background information helpful to the plan revision process, and commenting on various Inyo National Forest proposals and documents published during the plan revision process. Most often we have worked and commented in collaboration with other Sierra Club groups and chapters and other environmental groups such as Friends of the Inyo and the Bristlecone Chapter of the California Native Plant Society. We will of course be submitting comments to the Forest Service on the DEIS and Draft Management Plan by the August 25 deadline. For the last two years, the Sierra Club has provided a staff person – Eastern Sierra Organizer, Fran Hunt – to aid us in participating in the plan revision process. Fran is also a member of our Range of Light Group Executive Committee. I know Fran has met with many if not all Mono and Inyo County supervisors. Some supervisors have attended local meetings organized by Fran and Friends of the Inyo to inform and build local support for the revision process.

We are encouraged that the plan process has finally reached this milestone. We commend the Inyo National Forest personnel for its outreach from the beginning to various local stakeholders – private citizens, interested environmental and other groups with an interest in use and management of the forest, tribes, and local government entities including the Board of Supervisors of the two counties.

We are writing to the Board of Supervisors at this time to urge you to remain actively involved at this important stage of plan development in order to ensure a plan that will provide for preservation, ecological integrity, and where appropriate restoration of the Inyo National Forest in a manner serving the interests of the two counties and local residents who regularly utilize the forest resources as well as serving the many visitors who recreate in the Forest, providing crucial economic benefits to our two counties. In this letter we will comment further on issues we identified in our June letter. Several of our members, including Fran and myself, attended the BOS meeting where Forest Service made a presentation followed by comments from individual supervisors and members of the audience. We are aware that a follow-up consideration of the plan by the BOS will take place likely on August 9 or 16, resulting in directions to county staff to prepare a comment letter to be approved by the BOS and submitted to the Forest Service. I, unfortunately, will be out of state on previously planned trip with our kids and grandkids at the time of the August meeting. Thus on behalf of the Range of Light Group I am submitting these comments at this time before my departure. Other of our members will undoubtedly attend your August meeting(s) relevant to the plan.

The following comments proceed on the assumption that the Forest Service is likely to adopt a modified Alternative B (rather than A, C, or D). However, various elements from plans C and D might be incorporated into Alternative B as well as other changes resulting from citizen and organization comments made on the draft management plan and the DEIS.

Potential new wilderness areas – in contrast to Inyo County, the Preferred Alternative (B) of the draft plan includes no new recommended wilderness areas in Mono County. Alternative C does include wilderness recommendations for portions of the Glass Mountains and for citizen recommended areas such as Dexter Canyon, Excelsior, and Horse Meadow areas. We urge your support of wilderness recommendations for these important areas in Mono County. Safeguarding these areas as wilderness would diversify the recreation opportunities the County has to offer and maintain these four special areas much as they are today for current and future users to explore and enjoy. Many of the potential wilderness areas contain at-risk species. New additions to the endangered and threatened species list always raises local concerns about access and use of certain areas. One way to prevent listing is to expand wilderness areas that contain at-risk species thus increasing the viability of these species. Most of the areas below contain presently underrepresented habitat, and also underrepresented mid and lower elevation areas. More information is

- Glass Mountains: I feel an especial link to the Glass Mountains as I have an unobstructed view toward them from my deck. The East-west range provides both habitats not well represented in existing wilderness areas but also provides an important migration corridor between the Whites (and on to the Great Basin) and the Sierras. With out of area visitors especially concentrated in the Mammoth Lakes area, the Glass Mountains provides an easily visible and accessible wilderness area offering a different type of wilderness experience. Wilderness designation for the Glass Mountains would help expand and diversify the County’s recreational “carrying capacity.” Note that the area of the Glass Mountain potential wilderness in Alternative C is about

twice as large as in the December, 2015 proposal. The smaller version, which the Sierra Club supports, omits lower slope areas which are important bi-state sage grouse habitat and are thus managed under the agreement for managing the bi-state sage grouse that will hopefully avoid the necessity to list this species as endangered. It also contains important habitat for the Northern Goshawk, another at-risk species.

- Excelsior: This area provides connectivity between the White Mountains and the Bodie Hills and again contains typical landscape forms not well represented in existing wilderness, again with rare and at-risk species. It provides a wilderness area in the northeastern part of the county.
- Dexter Canyon: The canyons of this area are unique in the county. It contains a number of free flowing streams supporting crucial riparian habitat which is rare in the region. It contains 7 species of conifers and provides habitat for the Black-backed Woodpecker.
- Horse Meadows (additions to the Ansel Adams Addition) would extend the existing wilderness towards the floor of the Mono Basin. It contains an important old-growth mixed conifer forest area that includes limber pines and old growth lodge pole forests. The area is designated critical habitat for the Sierra Nevada bighorn sheep and Northern Goshawk. It also contains important cultural resources – as it served as the main Paiute trade route between Yosemite and the Mono Basin.
- Not included in Alternative C is Solitude Canyon which extends into the southern urban boundary area of Mammoth Lakes. This is a relatively small area and as a wilderness would probably have to be treated as an extension of the John Muir Wilderness. This is popular with our members as a cross country ski and hiking area. As with the other suggested wilderness areas, it would not involve closing any legal designated motorized routes. It sees much less recreational use than the areas close to the Lakes Basin trailheads but is even closer for visitors lodged in Mammoth Lakes than are Lakes Basin destinations. This area was (along with the Sherwin bowl immediately to the west) a central part of the Sherwin Mountains slopes ski area, proposed several decades ago but no longer a live project.
- White Mountain Additions (East and West): Although these proposed wilderness areas (both Alt. B & C) are in Inyo County, we urge the Mono County BOS to support them. The southern boundary of the White Mountain Wilderness established in 2009 is the Inyo-Mono county line. This is an artificial, invisible boundary. The White Mountain Additions will create more ecologically natural and more easily identifiable boundaries at the south end of the White Mountain Wilderness.
- More information can be found about the 13 potential wilderness areas (both Mono and Inyo Counties) that the Range of Light Group (Sierra Club) supports in the Wilderness Fact Sheet attached to the same email as this letter.

Wild and Scenic River (W&SR) Designation: the Sierra Club supports the Forest Service's determinations concerning all 160 miles of rivers and streams the agency identified as eligible for wild and scenic protections on the Inyo National Forest. We also maintain that Dexter Canyon and Wet Canyons, S. Fork Birch Creek, O'Harrel Canyon Creek and the lower reaches of restored Mono Lake tributaries Rush, Parker and Walker should be deemed eligible. Reclassification of some W&SR segments (wild, recreational, scenic are the 3 available classifications) might be considered.

The plan should include or at least commit to setting timelines for management plans for the wilderness and W&SR areas established in 2009, as well as any newly established areas under the new plan. The Forest Service in the plan should also give greater consideration to alternate designations to protect areas

(not ultimately included in the Wilderness and W&SR recommendations) to protect their recreational, cultural, biological, and scenic values.

Attention to aquatic and riparian ecosystems, including meadows – many of which are in need of restoration and which are even more crucial due to anticipated water deficits. Alt B contains additional CAR's (Critical Aquatic Refuges) but these are all in designated wilderness areas and thus do not contribute much added protection and restoration. The plan does have a target of restoration of 10 (unspecified) meadows of unspecified total acreage. The restoration goal for degraded meadows should be increased and stricter standards implemented to aid restoration. Current grazing practices (including whether to renew grazing permits upon expiration) need to be reconsidered given that all existing poor quality meadows show negative impact from grazing. Trout Unlimited has made specific plan recommendations and we encourage you to support their recommendations in your comments to the agency.

Protection of sensitive and at-risk plant and animal species: we are glad to see special attention to Sierra Nevada Bighorn sheep has been added to the plan but are disappointed that the at-risk black-backed woodpecker and northern goshawk are not given similar attention – as well as a number of other at-risk species such as pine marten, Yosemite Toad and yellow-legged frog, and Willow flycatchers. Monitoring and conservation plans need to be required for these and other at-risk species. Fire regime and timbering recommendations should give more consideration to negative effects on at-risk species – e.g., due to loss of required habitat. Guidelines should be provided for dealing with invasive species that threaten native flora and change habits (Plan, p. 34).

Fire management: restoring natural fire process to the extent possible while protecting urban areas. While the plan represents an improvement over the once dominant practice of total suppression, the Forest Service needs to increase managed and prescribed fire beyond the goal stated in the plan. Mechanical treatment should be deemphasized except near urban areas. Treatment should focus on surface and ladder fuels which are the chief culprits in causing extreme wildfire events. Post fire salvage logging should be limited to protect the complex early seral habitat that emerges after fire. Standards and guidelines should be included for snag recruitment and retention to the benefit of wildlife (such as the black-backed woodpecker). Although not a comment to be addressed to the Forest Service, we urge the BOS to urge their legislators to support legislation that will fund extreme wildfire suppression via FEMA appropriations – as is true for other natural disasters. With wildfire activity continuing to increase into the foreseeable future, despite improved fire management practices, the percentage (and absolute amount) of the Forest Service budget available for the services many other required operations will only decrease further.

Timbering: aiming for a 50% increase (Appendix E) in logging (fuel wood and saw logs) as compared to the 1988 plan is undesirable policy. The benefit to the Forest Service is clear: additional revenue. The downside is negative effect on forest habitat. The plan needs stricter limits on trees over 20" diameter and normally no logging of trees over 24" diameter. Unfortunately, these large trees are the ones most attractive to logging operations. Natural forest regeneration should be given priority over planting which leads to a plantation like forest rather than a natural forest. Salvage logging should be conducted only to the extent required for safety reasons. Removing logs in both salvage and commercial timbering operations negatively impacts the soil due to the mechanical equipment necessary for the operation and creates new paths for illegal off road vehicle operation. Some of the areas designated in the plan as

suitable for timber production are also areas that include pine marten dens, northern goshawk protected activity centers, and goshawk and marten breeding sites. Such areas should be removed from the suitable timber base in the final plan.

Sustainable Recreation: the plan recognizes that the Inyo is primarily a recreational forest. Our counties increasingly recognize recreation as a primary driving force of the local economy – and even more so in the future. The plan needs to more fully address how to deal with negative recreational impacts; how to separate incompatibles uses and users (appendix D); and to recognize more fully that standards and guidelines that should apply to winter/snow season are different from those that apply to other seasons. There should be a separate ROS (Recreation Opportunity Spectrum, plan, p. 137) and analysis for winter season. We are glad that the development of new Over Snow Vehicle (OSV) regulations has been postponed until completion of the revision of the forest plan. This should ensure better integration between the two. The forest plan should contain components to guide development of management prescriptions for the different ROS categories.

The plan should also address more fully the issues of deferred maintenance that affect many recreational (and other) issues. The plan should push the forest to a more pro-active role in education and interpretation (including new media when it is still new) to increase use of less utilized forest areas. New technology has to do not just with education and interpretation, but also with how users use the forest. One currently developing “use” not mentioned in the plan (according to a quick word search – perhaps it is mentioned in accompanying documents) is the use of drones. Drones raise issues of noise (crucial to the “solitude” forest experience), privacy, effects on wildlife and undoubtedly more. I believe the National Park Service has instituted a temporary ban (with exceptions) on private use of drones on park lands. Of course drones have positive benefits for fire observation, wildlife monitoring, search and rescue and more.

Partnerships and Volunteers: the draft plan has seriously addressed the use of partnerships and volunteers in various places (e.g., plan p. 36, 90; Appendix C). The forest should commit to instituting a full-time position of partnership coordinator. The use of volunteers should not be considered simply a budget necessity. Use of partnerships with existing groups that have budget and staff is difficult but still easier than mobilizing the potential resources of many willing volunteers who do not identify as members of specific organizations. In between funded and staffed organization and unaffiliated individual volunteers are a number of environmental and recreational organizations that locally operate on a purely volunteer basis with no local paid staff and minimal budget – such as the Eastern Sierra Audubon Society, and California Native Plant Society. These types of organizations through their often sizeable membership are a potential source of increased volunteer involvement beyond their traditional outings. Citizen Science projects are nationally another exploding area that is important for our forest also.

Four Final Topics: Climate Change; Monitoring and adaptive management; Best Available Science; Coordination with other Public and Semi-public agencies

- **Climate Change:** The 2012 planning rules mandate attention to climate change in developing new forest plans. Throughout various sections of the plan, climate change is recognized as a stressor and a cause of change. The plan also recognizes the need to “effectively address climate change” (plan, p. 92) and to monitor a number of indicators for effects caused by climate change

(plan, p. 122). However, it seems to us that climate change is not sufficiently addressed in the draft plan. Climate change needs not only to be addressed for its effects (and possible mitigations) at the relevant points of the plan. Climate change is a potential game changer for everything that effects the forest (after wildfire and warming, how much “forest” may remain in some west side forests is uncertain) and should be systematically addressed in the plan.

- **Monitoring and adaptive management:** we support increased monitoring and adaptive management procedures with measurable tests and criteria to determine if plan goals are being achieved.
- **Best Available Scientific Information (BASI):** we could like to see in the plan fuller citation, where relevant, of BASI sources on which specific parts of the plan are based. BASI usage is another directive of the 2012 planning rules. As it stands, it is simply impossible to access whether specific sections actually utilize the results of BASI.
- **Coordination with other Public and Semi-public agencies:** this is also mentioned from time to time in the plan. Obviously the Forest Service cannot operate without coordinating with the California Department of Fish and Wildlife and the US Fish and Wildlife Service. The Forest Service and the National Park Service coordinated with one another in the park service’s development of a new management plan for Devil’s Postpile National Monument a few years ago. We only hope that in landscape scale planning activities coordination between agencies that manages a landscape that extends beyond the boundaries of one agency will increase. Fire, animals, and plants don’t recognize agency boundaries (and often users don’t really care whether it is BLM and the Forest Service managing the land they create on). Even a simple matter such as BLM roads having one number but a different number once the same road continues onto Forest Service land can be unnecessarily confusing to a user trying to find her way on public lands.

Thank you Board of Supervisors for your involvement over what will in the end have been a 5 or 6-year process of development of a revised Forest Management Plan for the Inyo National Forest. The results of the new plan will be crucial to the effort to keep Mono County “Wild by Nature.

Sincerely,



Malcolm Clark, vice-chair & conservation chair
Range of Light Group, Toiyabe Chapter, Sierra Club
wmalcolm.clark@gmail.com (my email)
PO Box 3328, Mammoth Lakes, CA 93546 (my mail box)
760-924-5639

Inyo County Agriculture Resource Advisory Board

207 W. South Street
Bishop, CA 93514

July 29, 2015

Board of Supervisors, County of Inyo
PO Drawer N
Independence, CA 93526

Honorable Board Members,

Thank you for the opportunity to provide comments for consideration and potential inclusion in Inyo County's response to the USFS plan for Inyo National Forest. Agriculture operations not only provide valuable economic contributions to Inyo County, but are also a part of our local culture and way of life. The Agriculture Resource Advisory Board has several general concerns and comments which are outlined below:

1. The plan should not support alternatives that result in loss of current grazing lands, inclusive of both acreage as well as utilization levels. Current management of grazing allotments and associated plans has successfully balanced multiple uses with environmental protection on lands which grazing occurs. Grazing in areas designated for this use has provided valuable ecosystem services through fuel load reduction and healthy meadow maintenance while also helping our local rural economy.
2. The plan should preserve routes traditionally used by ranchers to access backcountry grazing allotments. This includes trails used to move stock as well as roads used to provide access for feeding, maintenance, and other needs associated with ranch operations. Wilderness designations or other impediments that could adversely affect the accessibility of ranching operations should not be considered.
3. New wilderness designations are unneeded and would set a dangerous precedent for future revisions. Past wilderness designations have created unintended difficulties for ranchers due to access and operations impediments. Examples of these complications include closures of roads used to access allotments for maintenance and prohibition of tools used for range management such as chainsaws. Such obstacles can reduce or eliminate these grazing operation's sustainability and thus local economic contributions. Wilderness designations, when fragmented as in Forest Plan Revision Alternative "C", have also created pressure in later years to link these wilderness fragments together. Our current wilderness designations provide adequate protection for actual high value wilderness areas.

4. The Inyo County Priority Agriculture Overlay needs to be considered in the plan. This overlay, which has been submitted to USFS by Inyo County Planning in the past, was created by local agencies with input from our communities including the agriculture industry. This overlay identifies areas traditionally used for agriculture within Inyo County that are considered important to our local economy and culture.
5. The plan should include reactivation of historic grazing allotments that were closed for research that has since been completed such as the Cabin Bar lease. This research had a defined timeframe which has since expired. These lands should be returned to multiple use management.

Again, thank you for the opportunity to provide input on this proposed plan.

Sincerely,

A handwritten signature in cursive script that reads "Gary Giacomini". The signature is written in black ink and is positioned below the word "Sincerely,".

Gary Giacomini
Chair, Inyo County Agriculture Resource Advisory Board



Wilderness Opportunities on the Inyo National Forest

From the flanks of the Sierra Nevada to the open sagebrush steppes of the Great Basin, the Inyo National Forest is blessed with hundreds of thousands of acres of wild, roadless lands. These remaining open spaces provide essential animal and plant habitats and offer exceptional opportunities for self-powered recreation including, for example, hiking, camping, birdwatching, backpacking, hunting, wildflower viewing and horseback riding. Of these treasured landscapes, the Sierra Club and the Friends of the Inyo are supporting a total of 13 additional wilderness areas (9 in Inyo County and 4 in Mono County) as part of the new forest plan for the Inyo National Forest.

Each of these 13 areas has also been identified by the Forest Service as suitable for wilderness designation. Four of these areas are in the Preferred Alternative B for the Draft Plan. All 13 are recommended in Alternative C (the “conservation alternative”). The Sierra Club supports the general boundaries for these areas depicted on the Forest Service maps dated 01/12/2016.

These 13 share the following characteristics: (1) The intact condition of the ecosystem types; (2) good opportunities for solitude and primitive and unconfined recreation; (3) good opportunities to add minimally or underrepresented habitats to the areas protected as wilderness on the Inyo National Forest, and 4) they can be protected as wilderness without closing any legal roads or motorized trails. In several cases, the area is also contiguous with existing designated wilderness and contains a wild and scenic river.

The following area descriptions describe many of the reasons these areas are worthy of wilderness protection.

Inyo County

Deadman Canyon

This area is located between the White Mountains and Inyo Mountains, north of Eureka Valley Road and south of the boundary between the White Mountain and Mt. Whitney Ranger Districts. Ecosystem types include pinyon-juniper, sagebrush and xeric shrublands and blackbrush which are habitats that are under-represented as wilderness currently on the Inyo National Forest. The topography includes steep to gentle slopes and offers opportunities for solitude and a wilderness quality experience. The pinyon-juniper woodlands and subalpine areas offer popular primitive recreation opportunities including hiking, horseback riding and deer hunting.

Deep Springs North

This area contains rich birch-cottonwood riparian forests that host a recently discovered isolated population of Black Toad, a California Fully Protected Species. The Birch Creek drainage comprises the majority of the area. Portions of the creek have perennial flows which provide critical habitat for a variety of species and the creek is noted for its travertine formations and for the canyon it has formed through the granite batholith. The area includes the Birch Creek granite batholith geologic feature, which has scenic and scientific values, and several rare plants. The area provides good opportunities for solitude and primitive and unconfined recreation, outside of the Schulman Grove and Bristlecone Pine Visitor Center. The area is distant from occupied and modified areas. The steep ridges and deep drainages support a remote experience away from the sights and sounds of people inside the wilderness.

Significant species found in this area include Black Toad, Bi-state Sage Grouse, Bristlecone Pine, Townsend's Big-eared bat, Spiny-leaved Milkvetch, Little Cutleaf, Nevada Ninebark, Compact Fleabane, and Dedecker's Clover. Wilderness would provide important permanent protections for these and other species in the area.

Inyo Mountain Wilderness Addition

A portion of this proposed addition is contiguous with the Inyo Mountain Wilderness, so its addition would enhance the existing wilderness and provide additional habitat connectivity and protection. Ecosystem types include pinyon-juniper, sagebrush, subalpine forest and xeric shrublands and blackbrush which are habitats that are under-represented as wilderness currently on the Inyo National Forest. The topography includes canyons, including Marble Canyon, extremely rugged terrain and high elevation plateaus with steep to gentle slopes along the eastern side. The area offers opportunities for solitude and quiet recreation. Marble Canyon is a unique geologic feature in this area.

Significant species found in this area include Townsend's Big-eared Bat, Pinyon Beardtongue, Inyo Milkvetch, Pinyon Rockcress, Mohave Fishhook Cactus, and Bristlecone Pines. Wilderness would provide important permanent protections for these and other species in the area.

Piper Mountain Addition 1

Located at the northern end of the Inyo Mountains, the Piper Mountain Addition 1 borders the Piper Mountain Wilderness (managed by the BLM) to the east. These contiguous wildernesses would provide habitat connectivity which will benefit species as they move and adapt to environmental factors and threats. These lands are known for unparalleled cultural resources scattered among pinyon-juniper, xeric shrub and blackbrush, which are habitats that are under-represented as wilderness currently on the Inyo National Forest.

In Alternative B, the boundary for this area has been refined to make it more clearly identifiable and use setbacks from roads and motorized trails that were consistent with

other wilderness boundary setbacks on the forest. The northern and western sections of the boundary closely follow authorized (legal) national forest roads and motorized trails. The southern boundary generally follows a prominent natural feature, an east-west trending ridgeline.

Significant species found in this area include Little Cutleaf, Mojave Fishhook Cactus, Compact Fleabane, Inyo Milkvetch, Pinyon Beardtongue, and Inyo Onion. The area's Alkali Flats are an underrepresented type on wilderness area in the national forests in California. Wilderness would provide important permanent protections for these and other species and unique habitats in the area.

Piper Mountain Addition 2

This area has high ecological integrity with few alterations to natural conditions. There are no known developments in the area that would degrade the undeveloped quality. The combination of alkali flats (an underrepresented type on wilderness area in the national forests in California) and old growth pinyon-juniper is a unique feature of this area worthy of protection as wilderness.

Significant species found in this area include Little Cutleaf, Mojave Fishhook Cactus, Compact Fleabane, Inyo Milkvetch, Pinyon Beardtongue, Inyo Onion and Alkali Flats (an underrepresented type on wilderness area in the national forests in California). Wilderness would provide important permanent protections for these and other species in the area.

Soldier Canyon

This area is contiguous to the existing Piper Mountains Wilderness managed by the Bureau of Land Management and offers a unique opportunity to conserve an east-west corridor for species moving from the Mojave to the Sierra and habitats not well represented as current wilderness on the Inyo National Forest or nationally. This opportunity to safeguard habitat connectivity and under-represented habitats is extremely important in this era of drought and environmental stress, as species will be moving and adapting as conditions and habitats change.

The area's topography is varied (steep to gentle slopes) and opportunities for solitude are provided by vegetation and the area's canyons. The area also offers opportunities for backcountry recreation activities including hiking, horseback riding and hunting. The area also provides opportunities for wildlife observation, photography, spring wildflower observation, cultural/historical resource exploration, and enjoying nature in a quiet setting.

Significant species found in this area include Mojave Fishhook Cactus and Little Cutleaf. Wilderness would provide important permanent protections for these and other species in the area.

South Sierra Addition

This area would be an addition to the existing South Sierra Wilderness and is contiguous to the BLM administered Sacatar Wilderness to the south. Its protection would enhance the existing wilderness and provide additional habitat connectivity and protection. This South Sierra Addition is characterized by rugged high desert peaks scattered with yucca and Joshua Tree woodland, rare vegetation types on the Inyo National Forest. The area also contains important true Mojave Desert ecosystems which are largely intact and include Joshua trees, cholla cactus, creosote, plus health canyon live oak ecosystems and pinyon-juniper. Haiwee Creek is a perennial stream, with important riparian habitats for plant and animal species. Because this South Sierra East area would also provide important habitat connectivity between the lower elevation habitats of the Sacatar Wilderness to the high Sierra habitats in existing wilderness along the Sierra crest, this area is particularly important, ecologically speaking, to protect.

The area also offers challenging opportunities for solitude and quiet recreation. The area also contains cultural resources (only some of which have been cataloged) that would be protected by a wilderness designation. There are significant opportunities for solitude or quiet recreation in this area.

Significant species found in this area include Cholla Cactus, Canyon Live Oak, Kern Milkvetch, Mountain Yellow Violet, Field Ivesia, Kern Canyon Clarkia, Charlotte's Phacelia, Silk Tassel Bush (northern most population), Kern Slender Salamander, and the Sierra Nevada Bighorn Sheep. Wilderness would provide important permanent protections for these and other species in the area.

White Mountain Additions West/East

These two additions to the existing White Mountains Wilderness to the north would eliminate an arbitrary county line boundary, separating wilderness from roadless areas. These additions would provide a more ecologically driven boundary following topography and other features of the land. To the west are the slopes of Blanco Mountain, containing a scenically varied mix of granite hoodoos, open sagebrush steppe, and limber-bristlecone forests. Water and Mills Canyons, which contain important perennial streams, are the area's predominant drainages and are worthy of additional protections. To the east, the landscape contains granite and volcanic highlands with remote and rugged areas such as Dead Horse Meadow and Black Birch Canyons, which provide vital riparian habitats. These two potential wilderness additions also include ecological features in the congressionally designated Ancient Bristlecone Pine Forest. The area supports a pinyon-juniper forest ecosystem that is currently underrepresented as designated wilderness (less than 10%) nationally.

These two areas offer notable opportunities for primitive (quiet, non-motorized) recreation. In addition to existing trails, there are opportunities for adventurous cross-country trips. In the Ancient Bristlecone Pine Forest there are opportunities to hike on unmaintained trails and for wildlife viewing, dark skies observation, photography and enjoying nature generally. The high elevation and lack of maintained trails adds to the

challenge and the wildland visitor experience. Opportunities for primitive recreation in the eastern portion of the area focus on horseback riding, hiking and hunting in the Crooked Creek drainage.

Significant species found in this area include Bi-state Sage Grouse, Booth's Evening Primrose, and Bristlecone Pine. Wilderness would provide important permanent protections for these and other species in the area.

Mono County

Dexter Canyon

A landscape of rough hewn granite knobs, rolling uplands, and flat volcanic mesas deeply incised with 25 miles of steep-walled rim-rock canyons reminiscent of the desert southwest, Dexter is unlike anywhere else on the Inyo National Forest. The western portion supports old-growth lodgepole and Jeffrey pine forests dotted with sedge/rush dominated meadows, while the northern and eastern portion are defined by open sagebrush plains, extensive snowbank aspen groves, and narrow riparian aspen-filled canyons. Free-flowing North Canyon Creek, Dexter Canyon Creek, Wild Cow Creek and Wet Canyon Creeks support locally-limited but ecologically critical riparian habitat.

The areas topography and remote character offer significant opportunities for solitude and a remote wilderness experience.

Significant species found in this area include a conifer "hotspot" with 7 species of conifer trees, as well as Black-backed Woodpecker, Bi-state Sage Grouse, and Peregrine Falcon. Wilderness would provide important permanent protections for these and other species in the area.

Excelsior

This area provides habitat connectivity between the northern White Mountains, the Excelsior Wilderness Study Area and the eastern wild lands of the Bodie Hills. It represents a wild, untouched chunk of the western Great Basin, containing extensive pinyon-juniper woods (not well represented as wilderness), isolated ephemeral lakes, dune systems, and locally limited but ecologically critical springs and associated riparian systems. This area has unique alkali wetlands, dune fields and sagebrush steppe and is rich in archeological resources. All of these unique features help make the area an excellent candidate for wilderness designation.

Significant species found in this area include William's Combleaf, Long Valley Milkvetch, Globe Dune Parsley, Dune Horsebrush, Wild Horses, and Bi-State Sage Grouse. Wilderness would provide important permanent protections for these and other species in the area.

Glass Mountain

The Glass Mountains are the only east-west trending mountain range in the Eastern Sierra. It is part of the Long Valley Caldera, which comprises lava domes, rhyolite and obsidian flows. With diverse forests ranging from pinyon to limber and Jeffrey pine, as well as

snowbank and riparian aspen groves, abundant meadows, spring-fed creeks, steep-walled canyons and high volcanic ridges it represents a wonderful and truly unique ecological recreational and cultural resource. This area is also an important migratory corridor and potential refuge for species facing the impacts of drought and a changing environment. It provides habitat for the Northern Goshawk.

In addition, this potential wilderness would provide an important overlay of protection to the existing upper portion of the O'Harrel Canyon Critical Aquatic Refuge (CAR).

Significant species found in this area include Lahontan Cutthroat Trout, Mono Lake Lupine, Raven's Milkvetch, Mono Milkvetch, Whitebark Pine, Limber Pine, Lodgepole Pine, and Northern Goshawk. Wilderness would provide important permanent protections for these and other species in the area.

Ansel Adams Addition

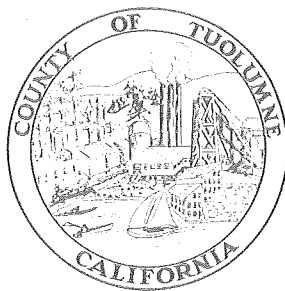
This area includes the transitional slope from the floor of the Mono Basin to the mid-slope boundary of the Ansel Adams Wilderness. This mid elevation, old-growth mixed conifer forest is very important ecologically, but poorly represented in protected areas on the Inyo National Forest. This mixed conifer zone is also unique for its diversity and inclusion of relatively rare conifer species – namely healthy limber pines in Bloody Canyon. The southern section includes extensive aspen groves, old-growth lodge pole forests, and numerous isolated riparian systems. An isolated population of Southern Alligator Lizards exists in aspen groves along the Parker Bench trail. This historically significant canyon supported the main route from Yosemite to the Mono Basin for thousands of years. The area is designated critical habitat for Sierra Nevada bighorn sheep.

Significant species found in this area include Robbins Pondweed, Sierra Nevada Bighorn, Sheep, Limber Pine, Southern Alligator Lizards, Northern Goshawk, Peregrine Falcon, and Bi-state Sage Grouse. Wilderness would provide important permanent protections for these and other species in the area.

For additional information, please contact:

Frances Hunt, Eastern Sierra Organizer, Sierra Club
(760) 873 6500
fran.hunt@sierraclub.org

Tuolumne County
Administration Center
2 South Green Street
Sonora, California 95370



Alicia L. Jamar, *Chief Deputy
Clerk of the Board of Supervisors*

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**BOARD OF SUPERVISORS
COUNTY OF TUOLUMNE**

Sherri Brennan, *First District*
John L. Gray, *Fourth District*

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Evan Royce, *Third District*
Karl Rodefer, *Fifth District*

August 2, 2016

Via Email
rlwary@fs.fed.us

Mr. Randy Moore
Pacific Southwest Region
United States Forest Service
1323 Club Dr.
Vallejo, CA 94592

Re: Extension of Inyo, Sequoia, Sierra Draft Forest Plan Revisions and Draft
Comment Period

The Tuolumne County Board of Supervisors is grateful for the opportunity to offer comments on the Inyo, Sequoia and Sierra Draft Forest Plan Revisions and Draft Environmental Impact Statement. However, as a rural, local government with limited resources, it will be extremely difficult to adequately review the multiple, extensive forest plan revision documents in a timely fashion. The Draft Environmental Impact Statement contains 740 pages and each Draft Forest Plan Revision contains almost 200 pages, as well as multiple appendices. In addition, each Draft Forest Plan Revision contains area-specific and technical information that is difficult to analyze in a meaningful way in a short amount of time. As a result, Tuolumne County requests an extension of the comment period by an additional 45 days, making October 9, 2016 the deadline for submitting comments.

A 90-day comment period does not allow sufficient time for Tuolumne County staff to thoroughly evaluate the lengthy document, which took over 4 years to develop, then review comments with the County's Natural Resources Committee for consideration and ultimately forward formal comments to the Board of Supervisors for approval.

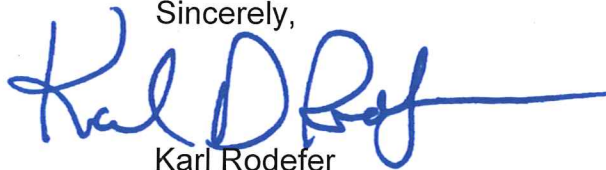
Although none of these "early adopter" forests are in Tuolumne County, the Board of Supervisors believes it is imperative to be active participants in this planning process, understanding that decisions made for these forest plans may become

Randy Moore
August 2, 2016
Page 2

templates for forest plan revisions moving forward, including the Stanislaus National Forest in Tuolumne County. With over 75 percent of the land in Tuolumne County managed by the Federal Government, the County must take advantage of this opportunity for early involvement in the forest plan revision affecting our neighboring National Forests.

The Inyo, Sequoia and Sierra Draft Forest Revision Plans and Draft EIS are very complicated and written in a way that make it particularly difficult for the general public to thoroughly examine, requiring expert natural resource consultation. Adequate time should be given to review the far-reaching environmental, as well as socio-economic, implications of these important documents since these forest plan revisions will have dramatic effects on many rural counties throughout Region 5 for years to come. Tuolumne County looks forward to hearing from you on the above request.

Sincerely,



Karl Rodefer
Chairman

cc: **Via Email**

Jeanne Higgins, Stanislaus National Forest Supervisor
Congressman Tom McClintock
Assemblyman Frank Bigelow
Assemblyman Tom Berryhill
Mariposa County Board of Supervisors
Madera County Board of Supervisors
Fresno County Board of Supervisors
Tulare County Board of Supervisors
Kern County Board of Supervisors
Mono County Board of Supervisors
Inyo County Board of Supervisors
Steve Brink, California Forestry Association
Jerry Jensen, American Forest Resource Council
California State Association of Counties
Rural County Representatives of California
Jack Rice, California Farm Bureau

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

ALICIA L. JAMAR
Clerk of the Board

By: 