



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

August 23, 2016

Mr. Randy Moore, Regional Forester
USDA Forest Service, Pacific Southwest Region
1323 Club Drive
Vallejo, CA 94592

**Re: Inyo, Sequoia & Sierra National Forests Land Management Plans Revision
#3375**

Dear Mr. Moore:

The Rural County Representatives of California (RCRC) is an association of thirty-five California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties are tasked with a variety of decision-making responsibilities related to land use and development in rural California communities and are challenged with environmental stewardship, economic vitality and social equity at the local level. RCRC welcomes this opportunity to provide comment on the USDA Forest Service, Pacific Southwest Region (Region 5) Inyo, Sequoia and Sierra National Forests Land Management Plans Revision #3375 (Plans Revision).

The USDA Forest Service manages 20 million acres of land in California, a full 20 percent of California's total land mass. As such, the proposed Plans Revision will set a significant precedent for future Region 5 plan revisions and will have a profound impact on how Region 5 plans for and manages lands within the boundaries of RCRC member counties. Those management decisions are of utmost importance to RCRC member counties as they have a direct impact on the socioeconomic health of the surrounding rural forested communities. As co-regulators and intergovernmental partners in Region 5's mission, counties have a significant interest in providing the most meaningful information and analysis possible to help craft current and future forest plan revisions.

RCRC is concerned that Region 5 is moving forward with the Plans Revision in its current form, as it is missing vital analysis on the current state of the three forests in light of the tree mortality emergency. The Plans Revision process began before the severe conditions from California's bark beetle epidemic began to emerge, and has not been updated or rewritten to reflect the current, dire state of our forest lands. As you know, the tree mortality epidemic poses an immediate threat to public safety, infrastructure, and

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property, and limits recreational and economic opportunities for the communities in and around those forest lands. To continue with the Plans Revision process without considering the true state of the forests will not only provide inadequate and unrealistic strategies for species conservation, vegetative desired conditions, watershed quality, prescribed fire, and other vital components to managing the forests, but is also irresponsible and needs to be addressed immediately before any further work is done on the Plans Revision. As a member of the California Tree Mortality Task Force, RCRC has worked with Region 5 staff and is well aware that members of your team understand the urgency of the tree mortality problem. This urgency must translate to the Plans Revision and any future forest plan revisions if Region 5 truly wants to successfully manage these forests.

RCRC also feels there is inadequate analysis of the impacts of large scale wildfire on the forests during the life of the existing plans. For example, the Rough Fire burned more than 140,000 acres combined in the Sierra and Sequoia National Forests in 2015, and is the 13th largest wildfire in California history, yet the Plans Revision as it stands fails to incorporate significant, meaningful discussion of its impacts or that of any other large scale fire. Wildfire results in profound consequences for water quality, wildlife habitat, and many other vital benefits from our national forests. There is simply no point in finalizing a forest plan without a thorough analysis of wildfire and its impacts on those benefits.

Finally, given the potentially significant impact of the proposed Plans Revision and the sheer volume of information involved, as well as the staffing and budgetary realities facing California's rural counties, RCRC is concerned that local governments have not had adequate opportunity to provide input on the proposal. The comment period provided is much too short a time for counties to respond to Region 5 on this important issue, particularly since the proposed Plans Revision took more than four years to develop, are more than 200 pages in length each, and are accompanied by a 740-page Draft Environmental Impact Statement. County staff needs more than a 45-day comment period to review and prepare meaningful comments, and obtain approval from their County Board of Supervisors, particularly when considering such complex, substantial, and important issues presented in the revision.

RCRC is also concerned that the short time frame has not afforded Region 5 staff the proper time to fully coordinate its efforts with impacted county Boards of Supervisors as required in the National Forest System Land Management Planning Rule adopted in 2012. RCRC previously requested a 45-day extension to the comment deadline, which would have been consistent with previous comment periods in the process and would have allowed for more proper coordination with local governments. As the planning process currently stands, our member counties are apprehensive about the plans moving forward, and feel that important decisions about the management of the forests have been largely taken out of the hands of local governments. RCRC would still request an additional comment period on the Plans Revision before any of the documents are

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finalized, particularly in light of the glaring omission of meaningful analysis of the tree mortality epidemic and other conditions vital to providing a plan that truly meets the management needs of these three forests.

If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or sheaton@rcrcnet.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON
Regulatory Affairs Advocate

cc: Debra Whitall, Project Team Leader, USDA Forest Service Pacific Southwest
Region
RCRC Board of Directors