

23 July 2021

Adam Barnett, Inyo National Forest
Thomas Bickauskas, BLM - Ridgecrest Field Office
Sent via email

RE: Comments on draft CRMPs for the Owens River Headwater and Cottonwood Creek Wild & Scenic Rivers

Dear Adam, Thomas and CRMP team members,

Thank you for this opportunity to provide comments on the draft coordinated resource management plans (hereinafter CRMP) for the Owens River Headwaters and Cottonwood Creek.

As one who worked along with dozens and dozens of other citizens, locally and nationwide, to achieve Wild & Scenic River designation for these creeks, I want to thank the leaders, ID team members and others who have worked to move these plans forward. These plans are important documents in and of themselves, but their true value, and the true value of these hard-fought national designations, will be realized through management actions on the ground for years to come. The quality of these plans will help ensure these actions meaningfully preserve and protect the outstandingly remarkable values, water quality and free-flowing character of these creeks.

This draft represents a solid effort towards describing the existing situation and detailing management actions to sustain the free-flowing nature and outstandingly remarkable values of these unique and nationally-recognized creeks.

I noted with appreciation modifications to the draft Resource Assessment (hereinafter RA) included in this draft CRMP. Thank you for including some publicly identified resources and issues in this updated RA. While the inclusions are welcome, some of the omissions seem glaring.

Owing to the stage we are at in this process, as well as the nature of management documents, these comments are focused on sections of the plans that may actually influence on the ground conditions of these creeks and their riparian systems.

Given that these plans are focused on actual places, critters and ecological systems, it would be beneficial to the commenting public, agency staff and the creeks themselves, if the agencies would schedule field visits to discuss these plans in the field in the coming months. Paper can only capture so much; discussing these issues in the presences of these streams will prove invaluable.

Owens River Headwaters

General Comments

“Observation Point”? - The maps and some discussion (p7, for example) include an “observation point” along the Deadman Creek road just west of Upper Deadman Campground. There is no such sign or designated place. If the Forest is proposing to develop such a location, you have my full support, but if not, please remove this non-place from the maps and discussion.

Omission of Dry Creek watershed’s hydrologic connection - Previous public comment from Friends of the Inyo on the RA included discussion and citations of peer-reviewed research by local scientist Sue Burak on the hydrologic connection of the Dry Creek watershed to the Big Springs complex. The discussion of *Free-flowing condition and water quality* beginning on p7 completely omits this important hydrologic connection and recent research. While Dry Creek-Big Springs connectivity is mentioned in passing on p17 and within the updated RA (B-20), this important hydrologic connection and associated research requires full acknowledgement in the CRMP.

Omission of available USGS flow data - As noted in previous comments submitted by Friends of the Inyo, *USGS operates a flow meter at Big Springs which provides real-time flow data!* Rather than base discussions and evaluations of the flows at Big Springs on anecdotal information, the CRMP must incorporate the existing scientific record and available data sources relating to hydrology and flow dynamics within the Owens River Headwaters (especially Big Springs). As noted above, these resources are well-documented and discussed in *Climate Impacts on Streamflow Dynamics of Mammoth Creek and the Upper Owens River, California* by Susan Burak (2015), while historical and future flow data are available from the USGS Gauging Station, Site ID number 10265125. This flow data is accessible at https://waterdata.usgs.gov/ca/nwis/inventory/?site_no=10265100&agency_cd=USGS&. This data must be used to inform establishment and implementation of a meaningful multi-constituent and multi-parameter monitoring plan for Big Springs and other locations along the designated corridor.

Outstandingly Remarkable Values

Thank you for the descriptions of the Outstandingly Remarkable Values to be preserved and enhanced through this plan. Thank you for including the historic Lower Glass Creek and Deadman Creek trails in the Recreation description, as well as including Dry Creek in the Geology/Hydrology section.

Please include discussion of the ecological importance of the Mammoth Gap - west of Deadman headwaters - as a migratory corridor for both plants and animals in the Wildlife and Botany descriptions. Additionally, in the Botany ORV description, please include the remarkable Red Fir

forest of the Headwaters. This unique forest reaches its greatest extent in the upper reaches of Deadman Creek and represents “the only major east-side occurrence of this species between the Kern Plateau and Hope Valley near Carson Pass” (Constantine-Shull, 2000).

As noted above, please include the findings of recent research by Burak (2015) and the USGS streamflow data in the Geologic/Hydrologic discussion of Big Springs.

Recreation Use, River Values and Capacity Analysis

Thank you for noting the potential effect human recreational uses may have on the ORVs and free-flowing character of the Owens system. In addition to the potential impacts of camping, which are thoroughly discussed, this section needs to include discussion of the impacts from roads, specifically the growing impacts of high-powered, high-torque side X sides on both Forest and County roads in and along the scenic and recreational portions of the WSR corridor. Use of these vehicles driving from Mammoth to June or just in circles with the area is perhaps the most visible and impactful recreation activity occurring here.

This discussion and the associated capacity analysis appear to omit any consideration of motorized day use and its potential impacts on all the documented ORVs. The capacity analysis for the non-Wild sections of the WSR corridors should be redone to include motorized day use numbers and impacts. While a vehicle counter was used to inform the Cottonwood Creek plan, none was utilized here. This does not make sense given the relative volumes of use at each location. Please redo the capacity analysis to include evaluation of daily vehicle crossings and trips on high use roads in the area such as the Deadman Creek road, 02S14 at the crossing of Deadman, along the signed Mammoth to June connector (especially 02S23B, C and A), the 03S26 complex, and 03S22. This analysis should also describe specific management measures to address increasing use on and off of designated routes within the WSR corridor. Omission of analysis and management actions for motorized vehicle use in this area represents a glaring gap in the management direction needed to preserve all of the ORVs, free-flowing character and water quality of the WSR corridors.

Management Direction

Desired Conditions

Thank you for the good description of Desired Conditions; they are sound and supportable.

Management Standards, Guidelines and Actions

Please number the standards for future reference.

Please **add** the following Standards to this good listing:

- Continue management of the designated road system within and adjacent to the WSR corridor through focused maintenance of designated routes and active annual restoration

of proliferated routes to reduce erosion, dust emissions and damage to ORVs, water quality and free-flowing character.

- Maintain or reduce designated motorized route density within the WSR corridor.
- Evaluate all projects within the Dry Creek, Deadman Creek and Glass Creek watersheds for potential to impact ORVs, water quality and free-flowing character of the WSR. Require mitigation of any identified individual or cumulative impacts. Require proponent cost-share funding of identified mitigations and/or monitoring efforts to be included as a mandatory condition of any new or re-issued special use permit within the Dry Creek, Deadman Creek and Glass Creek watersheds. Where mitigation is not possible, deny project actions which may impact ORVs, water quality and free-flowing character of the WSR.

Please add, “while restoring newly created sites” to the third standard.

Please add, “protect and enhance ORVs” to the fourth bullet.

Please clarify that “recreation facilities” includes roads and trails in the tenth bullet.

Please reword “campsite and dispersed camping impacts” to read “impacts from recreational activities and facilities” to the final bullet. Actions are needed beyond just addressing “camping”.

Potential Management Actions

Thank you for the thoughtful listing of potential management actions. For the next version of the plan, please break this list into Management Actions and Potential Management Actions as was done for the Cottonwood WSR CRMP. Providing a potential implementation timeline for these actions would aid the Forest and partners. For future use, please number the management actions.

Please **add** the following Management Actions:

- Sign county-maintained roads as closed to non-street legal use.
- Continue implementation of the 2009 ROD for travel management within the area through an integrated program of monitoring the designated system, maintenance of system roads and trails and active restoration of non-designated roads and areas.
- Create a base map of dispersed campsites with the WSR corridor and actively manage mapped sites to protect and enhance ORVs, water quality and free-flowing character of the WSR. Annually monitor identified sites and restore newly created sites. Restore or enhance management actions at identified sites which are damaging ORVs, water quality and free-flowing character of the WSR.

- Consider implementation of a free or fee-based “designated dispersed camping” management strategy in the WSR corridor and adjacent area.¹
- Install interpretive signage at specific locations within the WSR corridor to identify the creeks as Wild & Scenic Rivers while interpreting the ORVs and providing natural history, recreation and regulatory messaging.
- Enhance or restore spring-adjacent sites and disturbed areas at Big Springs Campground to enhance and preserve hydrologic function of Big Springs.
- Enhance interpretation and public enjoyment of Big Springs through installation of interpretive signage (in campground and at 2S04 crossing) and removal of chain link fencing above springs.
- Return Lower Glass Creek and Deadman Creek trails to the Forest list of designated trails. No NEPA was performed to remove these historic trails from the designated trail system².
- In conjunction with public involvement, reduce road density within the WSR corridor and adjacent area while encouraging re-designation of motorized routes to user-specific routes for single-track motorcycles, biking and hiking.

Please delete the sixth bullet and modify the fourth bullet to include roads and trails.

I do not support complete restoration and closure of the Upper and Lower Deadman campgrounds. We need more, not less, designated campgrounds, but yes, sites along the creek should be restored immediately.

Monitoring Plan

Please add “quarterly assessment of USGS data flow data” to the monitoring actions for water quality and free flow.

Please add a monitoring measure throughout the corridor for maintenance of the designated route network which may affect water quality, free flow and all ORVs with the monitoring action being to annually survey the designated route system and mapped dispersed campsites for proliferation or degradation.

As noted previously, this section over-emphasizes camping while under-acknowledging the impacts of motorized day use on and off the designated system. Once the Capacity Analysis is re-done this section needs to be re-worked to address motorized recreational use. A quick and

¹ <https://coloradosun.com/2021/04/02/crested-butte-camping-reservations/> and <https://crestedbuttemountainbike.com/camping/>

² These trails are shown on numerous Forest and private publications, including the 1961 and 1967 versions of *Mammoth-High Sierra Recreation Area* map and the 1971 and 1993 Inyo National Forest maps. Until the early 2000’s both of these trails were included on internal Inyo National Forest designated trail maps and the INFRA database.

simple fix would be to replace the word camping and campsites with “recreation and recreational facilities” throughout table 6. The same actions and triggers generally apply.

As a monitoring measure for Glass Creek Meadow trail, please consider the installation of a trail self-registration station at the trailhead. These are simple, and they work.

Cottonwood Creek

Overall, the CRMP for Cottonwood Creek is solid. Thank you.

Outstandingly remarkable values

Please reconsider the exclusion of Recreation as an ORV for the Wild Forest-managed section of Cottonwood Creek. While this area may be lightly used, rather than a justification for not designating recreation as an ORV, the untrammelled, unconfined, truly wild nature of upper Cottonwood is exactly what should be described and protected through purposeful management. Given the uniqueness of the sky-island meadows found in upper Cottonwood coupled with the dramatic increase in high-clearance vehicle based dispersed camping evident over the last few years across the Inyo, if the wild, undeveloped nature of recreation in this area is not actively preserved through management, it will be lost to overuse.

Desired Conditions

For the Forest segment, please add the following desired condition from the BLM section in conjunction with the addition of recreation as an ORV on the Forest:

- Conditions are managed to maintain visitor experiences related to designated route use, including route character and desired destinations; visitor crowding; area interpretation; and environmental ethics.

Management Standards and Actions

Please number these items.

For the Forest standards section, please add “designated route system” to the list of things roads must be consistent with in the first bullet.

To the list of management actions, please **add**:

- Implement the 2009 ROD for travel management within the area through an integrated program of monitoring the designated system, maintenance of system roads and trails and active restoration of non-designated roads and areas.
- Retire the Cottonwood Basin cattle allotment and remove unnecessary infrastructure.
- Install signage interpreting the Wild & Scenic River designation and Cottonwood Creek at the crest of 5S01a.

For the BLM section, please add the following to the excellent proposed list of management actions:

- Annually monitor and maintain the existing grazing enclosure fencing. Consider requiring permittee maintenance of this fence in working condition as a condition of the grazing permit renewal authorization.

Monitoring Plan

For the BLM section proposed monitoring action for water quality, please add “botany” as an addressed ORV and add “vegetation condition, structure and diversity” to the existing monitoring action.

For the Forest section, please add “departure from the designated system” as a management trigger with the action being active annual restoration of proliferated routes and maintenance of designated routes.

Thank you again for this opportunity to comment and your collective work to steward these wonderful waters. Hope to see you on a field trip to these creeks in the coming months.

Respectfully,

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