23 July 2021

Dear Inyo National Forest And Bureau of Land Management,

Hallelujah for successfully designating Cottonwood Creek as a WSR!

I am submitting comments on the draft Cottonwood Creek Comprehensive River Management Plan (CRMP). I first camped at lower Cottonwood Creek on September 1, 1985. Since then, I have camped there at least a dozen times to bird, botanize, study butterflies, hike, enjoy the solitude, and survey avian use of nearby desert scrub habitat. On a single occasion, I camped for several nights near the Patriarch Grove and descended into upper Cottonwood Creek.

The Cottonwood Creek draft plan:

(1) needs to add recreation as an Outstanding Remarkable Value for fishing, hiking, camping, hunting, and other possibilities for recreation that Cottonwood Creek provides.

(2) should include Geology as an Outstanding Remarkable Value due to the presence of many important and unique geological features. These include Lower Cambrian Trilobites, which are the subject of ongoing research at White Mountain Research Station.

(3) must recognize the eligible tributaries of Cottonwood, as they contribute to its Outstanding Remarkable Values. These include 3.7 miles of South Fork Cottonwood Creek and 3.4 miles of Poison Creek.

(4) must permanently retire the Cottonwood Creek grazing allotment to protect the Outstanding Remarkable Values of botany, fisheries, and wildlife.

(5) Should incorporate an annual monitoring plan. Components of the monitoring plan include annual surveys for recreational use, water quality and quantity, wildlife such as spring snails, and historic and prehistoric sites. More details below.

(6) Because eligible tributaries of Cottonwood Creek contribute to Outstanding Remarkable Values 3.7 miles South Fork Cottonwood Creek and 3.4 miles of Poison Creek should be recognized/included.

In addition to the general comments above, I quickly reviewed the Inyo National Forest and Bureau of Land Management Ridgecrest Field Office Cottonwood Creek Wild and Scenic River Comprehensive River Management Plan (CRMP 2021) (112791\_FSPLT3\_5643031.pdf).

Perhaps this is beyond the scope of a management plan, but the "wild" area type as shown on maps should be extended to include lower Cottonwood Creek. The existing dirt road should be removed, grazing eliminated, and the dewatered old channel downstream of Canyon Road crossing that currently flows into a single and high velocity irrigation channel should be rewatered. In recent years, riparian vegetation in the irrigation channel has been severely pruned by ranchers (and cattle). This has impacted nesting Swainson’s hawks (BLM: S, USFWS: BCC).

1. *One valid existing right, right-of-way CARI-007090, for an irrigation ditch has been approved since 1966 and is still authorized (CRMP 2021 p. 12).*

See comments above about re-watering the lower Cottonwood Creek channel and about vegetation removal on the ditch. This has impacted nesting Swainson’s hawks (BLM: S, USFWS: BCC).

1. *One power site reservation, created by Executive Order on October 18, 1912, reserved an area for a potential future power site near BLM's boundary with the Inyo National Forest. No proposals for a power site have been received by the BLM.* (CRMP 2021, p. 8).

The power site reservation should be retired or “uncreated” by Executive Order.

1. *SCC Wong’s springsnail and Owens Valley springsnail are recognized in the document as present in this area. Additional surveys for these species and monitoring for aquatic springsnail species are recommended.* (CRMP 2021, p. 19).

The monitoring plan should include searching for other possibly undescribed species of springsnail.

1. Add to monitoring regimen: Survey for Least Bell’s Vireo (federally endangered). Two observations in breeding season on lower Cottonwood Creek. See CNDDB reports-- Online Field Survey Source Code STR19F0061 and STR20F0021.
2. *Consider closing and restoring dispersed campsites to natural conditions, where they are adversely affecting water quality* (CRMP 2021, p. 36).

Yes!

BLM Segment of CRMP 2021.

1. *Limit the collection of firewood to dead and downed wood and consider restricting collection when the quantity of dead and downed wood cannot be sustained; alternatively, encourage campers to buy wood locally* (CRMP 2021 p. 35?)

*Reconfigure campsites to move fire pits away from the creek which includes placement of 1,000+ pound boulders for use as primitive fire pits/cooking areas* (CRMP 2021 p. 35?).

Prohibit campfires! On BLM lands on lower Cottonwood I have seen campfires with flames 15’ high. Terrifying and idiotic.

1. *High priority: Make application through the appropriate channel to achieve an in-stream flow water right* (CRMP 2021 p. 35).

Yes!

1. *Explore vegetation management projects to increase the diversity and quantity of trees along the creek which could include planting of willow seedlings along creek banks* (CRMP 2021 p. 36).

This should include rewatering/revegetating of the old channel of lower Cottonwood Creek below the Canyon Road crossing.

1. *Conduct road maintenance on the single lane dirt road in the river corridor (4.7 miles)* (CRMP 2021 p. 36). The road doubles as a hiking trail. Already its solitude (lower Cottonwood) is compromised by motorcycles. Enhancing this road for vehicle use would increase vehicle numbers and speed, thus greatly reducing the current wild and mostly peaceful experience.

As mentioned above, water quality monitoring is critical, especially given the high density of bovid use. Water quality monitoring should include lower reaches Cottonwood Creek.

To repeat, I urge USFS/BLM to permanently retire the Cottonwood Creek grazing allotment to protect the Outstanding Remarkable Values of botany, fisheries, and wildlife. A few years ago I hiked about 2 ½ miles of lower CC with a special interest in studying hummingbird diversity, which should be varied given the date (summer) and the elevation. I found only one nectar plant with a flower—a paintbrush. The rest of the paintbrush and other nectar-producing plants were grazed to a stubble. Costa’s hummingbirds occasionally nest in the area and are a USFWS BCC.

Thank you for working to improve Cottonwood Creek.

-Emilie Strauss