Data Submitted (UTC 11): 7/23/2021 6:34:13 PM
First name: Bill
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Title: Conservation Chair
Comments: To:USFS
From:Bill Luddy, Conservation Chair, Sierra Pacific Fly Fishers

Re:Owens River Headwaters and Cottonwood Creek Management Plans

Owens River Headwaters Plan:

- A more extensive analysis of impacts of the groundwater pumping, both current and proposed, from the Deadman, Glass and Dry Creek watersheds must be done with a focus on the impacts of the current long term drought and the compounding effects of long term climate change. This year's low snowpack, early runoff, and higher evaporation rates must be considered harbingers of future condition norms and planned for in any water management programs. Do not make the same error of over subscription that happened on the Colorado River in the 1920's.

- Include specific programs and goals to protect the river corridor from water contamination and activities that contribute to erosion, sedimentation, or riparian habitat. The analysis and programing needs to look broadly at projects and proposals that could impact this delicate river system, such as the proposed gold mine near Hot Creek which if approved would introduce significant disruption to the area including use of cyanide leaching to process ore - a significant danger of ground water contamination.

Cottonwood Creek Draft Plan:

- Give proper weight to the Outstanding recreational value that Cottonwood Creek offers. Beyond fishing, hiking and camping the Creek also has unique geological features which need to be recognized, preserved and protected.

- As with the Owens River Plan, the Cottonwood Creek Plan needs to be broadened in scope to include tributaries like south Fork Cottonwood Creek and Poison Creek that enhance the value of the area.