Data Submitted (UTC 11): 7/28/2021 4:20:58 PM
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Comments: The Owens River Headwaters draft plan:
Must analyze current and projected groundwater extraction from the watersheds of Deadman, Glass and Dry Creeks. Mammoth Mountain Ski Area extracts water from Dry Creek for snowmaking, and a 1994 Environmental Assessment by the Inyo National Forest analyzed a proposal by the Mammoth Community Water District (MCWD) to drill four water supply wells in the Dry Creek watershed to annually extract up to 2,000 acre feet of groundwater. Other potential points of groundwater extraction include recreational housing tracts and campgrounds, as well as the state road maintenance yard at Crestview.
Should also include the realistic impacts of climate change and chronic drought in identifying potential flow impacts on the WSR.
Should provide more information on potential water pollution sources and propose actions to resolve the accompanying water quality problem. For example, it notes the presence of bacterial contamination in Glass Creek but does not present possible actions to identify the source of the bacteria pollution or mitigate or eliminate either. The Forest Service has a responsibility to proactively protect and enhance the water quality of the Owens River Headwaters Wild and Scenic River.
Should expand the Outstanding Remarkable Values for scenery, botany, hydrology (such as including Big Springs) and ecology due to the Owens River Headwater's highly variable and diverse river systems.
Needs to be revised to incorporate recreational use data over multiple years. This will allow for collection of a complete picture of recreational capacity and help guide future management actions.
Should also include management actions that protect the river corridor from water contamination, activities that contribute to erosion, sedimentation, and riparian vegetation loss.
Should incorporate an annual monitoring plan. Components of the monitoring plan include surveys for water quality, wildlife-including Yosemite Toad and spring snails-recreation use, and riparian health.
The Cottonwood Creek draft plan:

Should add recreation as an Outstanding Remarkable Value for fishing, hiking, camping, hunting, and other possibilities for recreation that Cottonwood Creek provides.
Needs to add 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.
Should 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.
Should recommend the present options for permanently retiring the Cottonwood Creek grazing allotment to protect the Outstanding Remarkable Values of botany, fisheries, and wildlife.
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.