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Organization:

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Comments: Owens River Headwaters

Final Draft Plan:

- Must analyze current and projected groundwater extraction from the watersheds of Deadman, Glass and Dry Creeks. Points of groundwater extraction that must be considered include Mammoth Mountain Ski Area, recreational housing tracts and campgrounds, as well as the state road maintenance yard at Crestview.
- The environmental analysis and final plans must cite the Best Available Science from published research, not unpublished work that attempts to justify groundwater mining.
- The environmental analysis must include information on potential water pollution sources and propose management actions that address water quality problems. The Forest Service has a responsibility to proactively protect and enhance the water quality of the Owens River Headwaters Wild and Scenic River.
- The proposed User Capacity Limits do not represent recreational use over multiple years and grossly overestimate the carrying capacity of the Wild and Scenic River. Further, recreational capacity should focus on facilities and management actions that will create sustainable use of the river corridor into the future.

Cottonwood Creek

Final Draft Plan:

- Incorrectly references the river as being within the Desert Renewable Energy Conservation Plan area and being subject to Conservation Management Actions. This needs to be corrected.
- Should add recreation as an Outstanding Remarkable Value for fishing, hiking, camping, hunting, and other possibilities for recreation that Cottonwood Creek provides. This is included for the BLM portion of the river but is omitted for the Inyo National Forest portion.
- 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 be analyzed as an alternative in the Environmental Assessment permanently retiring the Cottonwood Creek grazing allotment to protect the Outstanding Remarkable Values of botany, fisheries, and wildlife.

BOTH Plans:

- Should also include standards, guidelines and management actions that protect the river corridor from water contamination, and activities that contribute to erosion, sedimentation, and riparian vegetation loss.
- Should incorporate an annual monitoring plan that would include annual surveys for recreational use, instream flows, water quality and quantity, wildlife, and historic and prehistoric sites.
- Should include descriptions of previous restoration or project work in the corridor that would inform management