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Comments:

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RE: Inyo National Forest Comprehensive River Manager Management Plan

Thank you for the opportunity to comment on the Owens River Headwaters Final Draft Plan.

Unfortunately, the revised plans fall short on addressing the issues raised during the August 2021 public comment period, and do not provide meaningful protections for these Wild and Scenic Rivers.

For the management plans to be effective, they must consider and address lands and facilities, recreation, and current and future actions and use the Best Available Science to make determinations about management. The final plans should include strong standards, guidelines and management actions that protect the free-flowing condition of the rivers, water quality and their identified Outstanding Remarkable Values (ORVs). In specific, the Final Plans -

- * 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- * The environmental analysis and final plans must cite the Best Available Science from published research, not unpublished work that attempts to justify groundwater mining.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.
- * 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.