

Data Submitted (UTC 11): 4/11/2022 2:20:35 AM

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Organization:

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Comments: April 10, 2022

RE: Inyo National Forest Comprehensive River Manager Management Plan - Cottonwood Creek Final Draft Plan

Thank you for the opportunity to comment on the Cottonwood Creek 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 -

* 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.

* 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.

Thank you for seriously considering these recommendations.