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Comments:

Plan and EA Comments

Deep/Holcomb Creek

- I am glad that the Forest Service is finally doing a plan for Deep Creek and Holcomb Creek. I am disappointed that it does not specifically plan and authorize immediate work to correct known significant water quality issues and threatened, endangered, and sensitive species conflicts related to uncontrolled recreation and Snow Valley pumping headwater groundwater to make snow and use for increasing summer and winter use. These should be clearly identified in this plan and a plan made to fix them or work on them as soon as practicable.

- There is not an acknowledgement of how critical summer water temperatures and low flows are to the stream and water dependent species that live there and maintenance of the Outstanding Resource Values. This is very important in Deep Creek as it has been significantly dewatered from natural conditions due to damming tributaries in Green Valley, Lake Arrowhead, and Running Springs/Arrowbear. Groundwater that sustains Deep Creek flows in the summer and fall has also been adversely affected by wells and pumping like has been practiced at Snow Valley ski area and other entities. During the 1990's and 2000's, we saw portions of Deep Creek dry up and this resulted in the loss of fish in the uppermost stream sections below Snow Valley Ski Area down to below Highway 18. This appears to be associated with the increased use of groundwater at the ski area and drought events. This needs to be described and potential mitigation measures discussed.

- The plan needs to include an action item to actively coordinate with communities in the watershed and the ski area to implement conservation measures to protect water quality and stream flows that contribute to the health of Deep Creek. In addition, the Forest Service should work with the communities and the ski area to see if there is any potential for safely using treated effluent to improve low flows which have been created by man's activities and development.

- There needs to be an evaluation and discussion of climate change and its potential effect on Deep Creek and Holcomb Creek as was done for the Whitewater EA and Plan. It is just as important for Deep Creek and Holcomb Creek as it is in Whitewater.

- The EA and Plan do not mention Snow Valley Ski Area and its connection to flows in Deep Creek. There is no doubt that the ski area and huge amount of groundwater use for snowmaking and winter use as well as summer recreation use is impacting summer/fall flows in Deep Creek. Although the stream adjacent to the ski area does not appear to be included in the management plan, its significance to flows needs to be discussed, and It would be appropriate for the Forest to make some management actions related to Snow Valley water use a part of the plan. Things like working with sewer and water providers to explore the use of treated effluent to make snow and restore degraded habitats. Implement water conservation tools at Snow Valley to reduce groundwater pumping such as waterless urinals, hauling water in the summer for summer recreation needs, lining the storage reservoir and covering its surface to reduce evaporation. Explore the construction of a sewer treatment plant at Snow Valley so that the groundwater pumped could be treated and returned to the stream rather than piped in a sewer line to Running Springs. Converting the sewer line from Snow Valley to a treated wastewater line bringing in treated water for use at the ski area would result in increased flows in the stream and provide a good source for snowmaking and other human uses.

- The boundary of the Deep Creek WSR should include the headwaters of Deep Creek up to just below the Snow

Valley Ski Area so the ski area and the highway is in the zone of influence and actions taken. This upper section is important to the entire stream, and its scenery as viewed from the highway is very important for residents and travelers. This area has important habitat for California spotted owl, willow flycatchers, flying squirrels and old growth forest. Management of these upper headwaters is very important to downstream health of the stream. Including this area will help ensure that Deep Creek WSR health is always considered in management decisions by Caltrans., Snow Valley Ski Area, and adjacent communities.

It is difficult from the map provided to see exactly where the northern boundary of the WSR is located. It should be at least to the high-water mark at spillway level for the Mojave Fks. Dam. The area immediately above the dam has had nesting southwestern willow flycatchers and arroyo toad that are important ORV's. Including the area immediately above the dam will help ensure that consideration of ORV's will be made by the Army Corps and the FS in the recreation and water management decisions.

- Re-establishment of the Deep Creek Manager position once filled by Brad Burns, is critical to really managing Deep Creek to the level needed to protect the Outstanding Resource Values and protect threatened, endangered and sensitive species. Due to the difficulty controlling the huge recreation demand in that part of the Forest, a position whose primary job is monitoring, planning, and coordinating work for Deep/Holcomb Creek is essential. The only time use was managed to a level where problems could be quickly identified and fixed, was when Brad was monitoring and coordinating actions to remedy problems. If this is just part of someone's job, or part of multiple people's jobs, it will not get the emphasis and coordination needed.
- Working with the Dept. of F+WL and the Corps to control non-native beaver should be an action item.

Whitewater

- It is good to see a plan for Whitewater WSR.
- The plan and EA do not mention the substantial diversion of flows in the upper South Fork by the City of Banning and Banning Heights Water. These diversions under Special Use Permit unnaturally dewater the upper reaches of the stream. This has a significant effect on riparian habitat, fish and amphibians downstream and needs to be discussed and mitigated for. There is a need for streambed alteration agreement and minimum flows as determined in the permitting that is ongoing. The permitting should strive to maintain summer/fall perennial flows below the diversion. This permitting and its effects on the WSR needs to be disclosed.
- The boundary of the WSR should extend to just below the Banning and Banning Heights diversion so that the diversion is in the area of influence boundary (corridor) and will always be addressed in permit decisions. Maintaining summer/fall flows below the diversion are very important to the ORV's (native fish, bighorn sheep, riparian habitat, etc.) in the South Fork. The permit being renewed, and potential FERC relicensing need to provide for a streambed alteration agreement and minimum flows.
- Wild trout and bighorn sheep should be mentioned as ORV's and the plan should include measures to work with Fish and Wildlife to protect these outstanding values.
- The need to remove feral cattle to protect the ORV's needs to be identified and made an action item.

Thank you for the opportunity to comment.

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