



**FRIENDS
OF
THE INYO** SINCE 1986

April 18, 2022

Adam Barnett, Inyo National Forest

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Thomas Bickauskas, BLM - Ridgecrest Field Office

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Sent via email

RE: Friends of the Inyo's Comments on the CRMP and Environmental Assessment documents for the Owens River Headwaters and Cottonwood Creek Wild & Scenic Rivers

Dear Adam, Thomas and the CRMP team members,

Thank you for this opportunity to provide comments on the updated Environmental Assessments and Coordinated Resource Management Plans for the Owens River Headwaters and Cottonwood Creek Wild & Scenic Rivers. Below are our requests and recommendations. Thanks so much for your attention to these matters.

Owens River Headwaters

Planning Context: Laws, Regulations, Directives, and the Forest Plan

In the Wild & Scenic Rivers Act section discussing Section 7 determinations, please include language to further clarify that “any water resources project” also includes “dams; water diversion projects; fisheries habitat and watershed restoration/enhancement projects; bridges and other roadway construction/reconstruction projects; bank stabilization projects; channelization projects; levee construction; recreation facilities.”¹

Land Use and Access in the River Corridor

Please add language to this section acknowledging popular recreational uses of this area - fishing (especially from Big Springs downstream to the terminus of the corridor), dispersed camping, hiking, auto touring and winter recreation - as supported by later discussion (see CRMP, p18).

Additionally, please acknowledge the total designated motorized vehicle route mileage which falls within the designated river corridor and enumerate all designated route river crossings, be they bridges, culverts or in-stream river crossings. This information is an important baseline for future land use and access management.

¹IWSRCC technical report, October 2004, pp3-4.

Baseline Conditions - Free-flowing Condition and Water Quality

The Environmental Assessment (EA) discussion of hydrology/geology at pp20-21 correctly identifies Big Springs as “a spring with flows so high as to be unique to the Sierra Nevada Mountains.” Further the EA notes that “recharge of the underlying groundwater system may be susceptible to reductions in snow pack and increases in rainfall events characteristic of more extreme changes in weather conditions as a result of climate change.” The draft CRMP at p10 adds “reduced snowpack and more intense rainfall events may result in reductions in flow at Big Springs.”

While painting a tenuous picture of the hydrologic future of Big Springs and the Owens River Headwaters, the document repeatedly acknowledges “this groundwater system is not fully understood” (EA, p20).

Given the legal requirement of the CRMP to provide a framework “for the protection and enhancement of the river’s water quality, free-flowing condition and outstandingly remarkable values” (CRMP, p1), the CRMP must contain implementable management direction to ensure future actions within this unique hydrogeologic system do not negatively impact the outstandingly remarkable values of Big Springs and Owens River Headwaters.

To protect these values, and address the apparent knowledge gap in hydrologic function, the CRMP should be amended to include standards that directly address the need for better understanding of this unique hydrologic system when evaluating any future or ongoing project.

Simply noting ambiguity while acknowledging the legal requirement to protect falls short of the letter and spirit of the Wild & Scenic River designation for the Owens River Headwaters.

Friends of the Inyo appreciates the CRMP’s acknowledgement of the need for management actions to address potential increases in sedimentation from recreational uses and facilities (roads, campsites) under the evolving climatic regime of more intense summer rain.

Outstandingly Remarkable Values

Friends of the Inyo acknowledges that “outstandingly remarkable scenic values can be attributed to all of the Owens River Headwaters.” (CRMP, p12). Given the importance of the Scenic Integrity Objectives in determining future actions, we question why a Scenic section of Glass Creek from the end of 03S26K extending upstream to the Wilderness boundary is rated “Medium”? This section is nearly entirely within the narrow canyon of Glass Creek out of sight of any developed road until reaching 02S11F just east of the Wilderness boundary. Please amend the SOI designation for this section to High or Very High to reflect the on-the-ground conditions.

Visitor Use Management and Capacity

As previously noted in prior comments, Friends of the Inyo does not support either the methodology nor results of the User Capacity Analysis. The focus on developed campground occupancy is both misplaced and misleading, as this area experiences intense summer day use while the data gathering to support this Analysis was conducted during the pandemic

interspersed with periods of intense smoke and forest-closures which invariably impacted the validity and applicability of any data. The statement that “most day use in the area is focused on the campgrounds and dispersed campsites” (CRMP, p24) is unsupported by any evidence or discussion and should be removed.

Management Direction

As noted above in the comments on *Free-flowing condition and water quality*, protection of water quality and quantity within the WSR corridor requires additional scientific study to more completely understand the unique hydrogeologic system supporting the Owens Headwaters WSR. As such, please include a Standard ensuring apparent knowledge gaps will be filled when analyzing new or re-issued permits for water projects that may impact the WSR.

Specifically, a Standard should be articulated to “Ensure protection of groundwater-dependent spring systems within the WSR corridor through proponent-funded, peer-reviewed scientific study for all water related projects proposed within the Deadman, Glass and Dry creek watersheds. Minimize and mitigate any identified potential impacts to WSR resources through proponent-funded monitoring and scientifically-supportable water quantity limits.”

Friends of the Inyo acknowledges and appreciates the increased focus on continued implementation of the 2009 Travel Management decision as an ongoing management action.

As part of the proposed formal maintenance agreement with Mono County to authorize ongoing County maintenance of portions of the Deadman Creek route (02S05), the County and Forest must acknowledge that County maintenance with state highway funds renders the County-maintained section of this route open to street-legal vehicles only (California Vehicle Code section 38025). In addition to detailing specific road segments to be maintained by the County, articulating best management practices to reduce sedimentation into the WSR, as well as designating an appropriate maintenance corridor width and depth, this agreement should articulate plans for signage and enforcement of CVC 38025 on County-maintained sections.

Please consider an additional management action to place signage at high visibility locations along the WSR corridor identifying these stream-reaches as within the National Wild & Scenic River System as the Forest has done for Upper Cottonwood Creek in the White Mountains.

Figure 8 - Recreation Opportunity Spectrum Map

This map does not include Glass Creek, Upper & Lower Deadman, Hartley and Big Springs campgrounds which are referenced in the text. Additionally, please use a more discerning roads layer to identify state highways, county roads and Forest-designated routes as unique route systems.

Monitoring Plan

Please ensure monitoring actions are tied to and support much of the well-articulated Management Direction actions.

To support the management action related to dispersed campsites, please add an annual monitoring action to quantify the number and extent of dispersed campsites within the WSR

corridor. This monitoring action works in concert with ongoing travel management implementation. Ideally, annual monitoring can establish a baseline of dispersed camping locations to manage while restoring newly emerging or expanding sites as they occur.

Cottonwood Creek

River Corridor Locations and Boundaries

Please note that the majority of Cottonwood Creek is in Mono, not Inyo, County. The description in the first sentence of this section seems incorrect.

Wild & Scenic River Act

Please update this section to refer to Cottonwood Creek WSR rather than the Owens in the section 7 discussion.

Management Direction

For the Forest Service segment of Cottonwood Creek, please add a management action to “Continue implementation of the 2009 ROD for travel management within the area through an integrated program of monitoring the designated system, maintenance of system roads and trails and active restoration of non-designated roads and areas.”

For the BLM segment of Cottonwood Creek, Friends of the Inyo appreciates and acknowledges the thoughtful measures articulated to manage recreational use along the river corridor. We strongly support requiring permittee maintenance of the existing *exclosure* fencing along the lower section of the river corridor upstream from the existing diversion. Management and maintenance of the ORVs and riparian function seem impossible without ongoing, required maintenance of this exclosure coupled with expansion and improvement of additional cattle exclosure fencing along the designated WSR corridor.

Sincerely,

A handwritten signature in cursive script that reads "Wendy Schneider".

[Wendy Schneider](#)

Executive Director, Friends of the Inyo