Appendix F

Errata Sheet

Summary of Corrections to the October 2020 Initial Study

Appendix F

Final CEQA Initial Study and Mitigated Negative Declaration for the Mono Basin Water Rights Licenses Project

Errata Sheet

The following summarizes the changes made from the October 2020 Initial Study and incorporated into the March 2021 Final Initial Study and Mitigated Negative Declaration. Added text is noted in red underline, and deleted text in red ~~strikeout~~. Some minor typographical corrections are not noted.

Cover:

Final CEQA Initial Study and Mitigated Negative Declaration March ~~October~~ 2020~~0~~1

Section 1.2 paragraph 1:

The City of Los Angeles Department of Water and Power (LADWP) is the lead agency under the California Environmental Quality Act (CEQA) and has prepared this Initial Study (IS) to address the impacts of renewing certain terms and implementing proposed changes to the terms and conditions of LADWP's Water Rights Licenses 10191 and 10192 (proposed Licenses). The proposed terms of the Licenses presented in this IS were developed under the guidance of the State Water Resources Control Board (SWRCB) to enhance stream restoration in the Mono Basin and manage Mono Lake's water level elevation. The objective of the project is to implement the Licenses as standalone "living licenses" including flow management and modification of the Grant Lake Reservoir (GLR) Spillway to allow for controlled release of larger volumes of water from the reservoir during specific time periods. The term "living licenses" has been used by the SWRCB, LADWP, and others to reflect a desire to consolidate into one single document, to the degree possible, all of LADWP's obligations related to the subject Licenses, including ongoing adaptive management.

Section 1.2 paragraph 2:

The proposed Licenses would not alter the existing Mono Lake elevation criteria or the existing routine annual water export terms, consistent with the *Settlement Agreement Regarding Continuing Implementation of Water Rights Orders 98-05 and 98-07* (Settlement Agreement). It is a proposed finding of fact of the Settlement Agreement that Mono Lake will continue, on average, to rise towards the post-transition trigger level of 6,391 feet above mean sea level (amsl) as previously forecast by the SWRCB. It is also the proposed finding of the Settlement Agreement that the 12,000 acre-feet (af) of additional export allowed by the proposed Licenses will not materially delay the date when Mono Lake reaches 6,391 feet amsl. LADWP is the public agency with principal responsibility for compliance with the terms of the Licenses. The SWRCB is a Responsible Agency that will consider approval of the Licenses.

Section 1.2 paragraph 4:

The City operates the existing Los Angeles Aqueduct (LAA) which transports water from Mono and Inyo Counties to Los Angeles. After the SWRCB issues the Licenses, implementation by LADWP would require modifications to operations and facilities such as the GLR spillway to allow for controlled release of higher volumes of water from the reservoir during specific time periods to simulate historical high flow conditions in Rush Creek. The IS has been prepared in accordance with CEQA, Public Resources Code Section 21000 et seq., and the State CEQA Guidelines, Title 14 California Code of Regulations (CCR) Section 15000 et seq. The IS serves to identify the site-specific impacts, evaluate their potential significance, and determine the appropriate document needed to comply with CEQA. The IS was distributed for public review from October 30, 2020 to January 6, 2021. The original close of the public review period was December 15, 2020; the end date was extended past the required 30 days in response to a request from the Big Pine Paiute Tribe of the Owens Valley. Ten comment letters were received on the IS. Appendix F contains a summary of the clarifications made to the text of the IS based on the comments received.

Section 1.2.1:

- Required implementation of stream restoration measures including periodic high streamflows designed to restore and maintain channels. These flows are called Stream Restoration Flows (SRFs). Order 98-05 set forth two SRF flow management tables, one for use during the transition period until Mono Lake reaches the ~~management~~ post-transition trigger level, and a second flow management table for use after that point. The goal was to develop functional, dynamic, and self-sustaining stream systems and to have self-sustaining trout populations with fish in "good condition" that could support a moderate level of angler harvest.

Section 1.2.1.2:

criteria. ~~This~~ LADWP's review determined that overall, the metrics of the termination criteria have reached restoration success standards. However, based on direction from the SWRCB and consistent with the recommendations documented in the Synthesis Report, LADWP has elected to move forward with the spillway modification to reliably implement SEFs. Under the proposed Licenses, the termination criteria previously defined in Order 98-07 would no longer be relevant.

Section 1.2.1.3:

Current operations are based on the requirements of D1631 and Order Nos. 98-05 and 98-07. Runoff years begin April 1, end the following March 31, are based on average runoff, and are defined as:

Dry:	80-100 percent exceedance (68.5 percent of average runoff)
Dry-Normal I:	70-80 percent exceedance (68.5 – 75~~.5~~ percent)
Dry-Normal II:	60-70 percent exceedance (75~~.5~~ – 82.5 percent)
Normal:	40-60 percent exceedance (82.5 – 107 percent)
Wet-Normal:	20-40 percent exceedance (107 – 136.5 percent)
Wet:	8-20 percent exceedance (136.5 - 160 percent)
Extreme-Wet:	0-8 (over 160 percent)

- **Rush Creek Instream Flow Requirements**. The minimum instream flow for the protection of fish in Rush Creek ranges from 31 cfs in Dry Years to 68~~80~~ cfs in Wet Years.

- **Grant Lake Reservoir Operations**. The April 1 storage goal for GLR is 30,000 to 40,000 acre-feet, depending on hydrologic year type. If storage falls below 11,500 af, the instream flow requirements will change to the dry hydrologic year flow requirement or the inflow to GLR, whichever is less.

Section 1.2.2:

The objective of the project is to implement the proposed Licenses as standalone "living licenses" including flow management and modification of the GLR Spillway to allow for controlled release of larger volumes of water from the reservoir during specific time periods. The term "living licenses" has been used by the SWRCB, LADWP, and others to reflect a desire to consolidate into one single document, to the degree possible, all of LADWP's obligations related to the subject Licenses, including ongoing adaptive management. ~~The Licenses accommodate SWRCB's management of public trust resources given documented findings in the Settlement Agreement.~~ Flow management under the proposed project would include SEF releases in Rush Creek and Lee Vining Creek; Walker Creek and Parker Creek would not be diverted. Outlet facilities at GLR are limited to the MGORD and a spillway to Rush Creek below the dam. The MGORD is an approximately 8,000-ft unlined channel, with a design capacity of 380 cfs. Augmenting the MGORD's flows with the current reservoir spillway configuration to achieve SEFs peak flows in Wet-Normal, Wet, and Extreme-Wet hydrologic year types has proven operationally challenging in the past, as flows into GLR are controlled by SCE and meeting flow targets via uncontrolled spills is inherently unreliable. In certain water-year types, implementation of the SEFs would require LADWP to release a flow higher than 380 cfs into Rush Creek below Grant Dam. The proposed project would include modification of GLR Spillway to allow LADWP to more reliably deliver the flows proposed in the Licenses in Wet-Normal, Wet, and Extreme-Wet hydrologic year-types. The proposed Licenses would not alter the existing Mono Lake elevation criteria or the existing routine annual water export terms, consistent with the Settlement Agreement finding that Mono Lake will continue, on average, to rise towards the post-transition trigger level of 6,391 feet amsl as previously forecast by the SWRCB.

Section 1.3.2:

The areas influenced by the operational changes defined by the proposed Licenses include GLR, Grant Dam, and areas downstream from LADWP's operating facilities. Specifically, these areas encompass GLR to the high-water mark, Grant Dam, the four tributaries and their active channels and floodplains, beginning at their points of release and ending at Mono Lake (**Figure 2**). For Rush Creek, the points of release include Mono Gate One, MGORD, Grant Dam toe drain, Grant Dam Spillway, the proposed Grant Dam spillway gate and spillway, and the 5-Siphons Bypass. Downstream of Grant Dam, Rush Creek also receives inflows from Parker and Walker Creeks, which are tributary to Rush Creek between GLR and Mono Lake. For Parker Creek and Walker Creek the points of release are the overflow weirs at the Lee Vining Conduit used during normal operating procedures as well as the sediment bypass systems. On Lee Vining Creek the points of release are all located at the Lee Vining Creek diversion facility and include the overflow weir, the Langemann® Gate (also used for sediment bypass), and the small slide gate next to the Langemann® gate.

Section 1.3.2.2:

Overflow Weir - LADWP operates the Parker Creek overflow weir where water can either be diverted from Parker Creek into the Lee Vining Conduit or allowed to flow over the weir and into Lower Parker Creek. In most years, Parker Creek flows are not diverted by LADWP. Parker Creek water diversions did occur in 2012, 2013, ~~and~~ 2014 and 2015.

Section 1.3.2.3:

Overflow Weir - LADWP operates the Walker Creek overflow weir where water can either be diverted from Walker Creek into the Lee Vining Conduit or allowed to flow over the weir and into Lower Walker Creek. In most years, Walker Creek flows are not diverted by LADWP. Walker Creek water diversions did occur in 2012, 2013, ~~and~~ 2014 and 2015.

Section 1.3.3.2 paragraphs 7 and 8:

Since 1998, peak flows have periodically exceeded the minimum target SRFs established by Order 98-05. In 2005, for example, a 403 cfs peak occurred, with 6 days exceeding 400 cfs (McBain & Trush, Inc., 2006; Section 4 of LADWP, 2006). These peak flows facilitated sediment transport experiments conducted by the Stream Scientists. In 2006, the Wet year requirement for 450 cfs for 5 days was exceeded, with a peak of 477 cfs and a duration over 450 cfs of 18 days (McBain & Trush, Inc., 2007; Section 4 of LADWP, 2007). In 2011, the next Wet year, ~~LADWP released~~ a peak release of 445 cfs (MGORD + Spill) occurred on July 11. Combined with flows from Walker and Parker Creeks, a totaled 564 cfs was measured in the Rush Creek bottomlands ~~peak flows equivalent to those recommended under the proposed SEF regime~~ (LADWP, 2012).

Prior to Order 98-05, GLR spilled in 1995 and 1998. The resulting flows exceeded the SRF peak target flows for these year types subsequently set forth in Order 98-05. Flows in excess of those established in D1631 and Order 98-05, in both magnitude and duration, were an intentional consideration in design of ~~pre-~~transition period operations, including export. The ~~fixed~~ current ~~pre-~~transition period maximum annual export of 16,000 af, applies to all years. In Wet-Normal, Wet, and Extreme-Wet years water in excess of the ~~fixed~~ current export, and often in excess of the SRFs, was specifically intended to reach Mono Lake to raise the lake through a transition period. Post-transition flows in excess of the minimum target SEFs are envisioned to be less than ~~pre-~~transition period flows in excess of minimum flow targets when Mono Lake is higher than 6,391 ft amsl because export will no longer be constrained by the 16,000 af annual maximum.

Section 1.4:

- New flow regimes (SEFs) on Mono Basin streams recommended by the Synthesis Report
- Construction of the GLR Spillway Modification
- Continued export of water to Los Angeles of 16,000 af per year ~~pre-transition (the period~~ until Mono Lake reaches the 6,391-ft amsl ~~management level)~~
- Continuation of SWRCB's protection of public trust resources prior to and following the attainment of the management level of Mono Lake, including municipal needs
- Additional water export of up to 12,000 af

  -Per the Settlement Agreement, it is assumed that the export will occur in four increments in normal or wetter years:

  i. 4,000 acre-feet upon receipt of final permits to construct the Grant Outlet;

  ii. 4,000 acre-feet upon active construction of the Grant Outlet;

  iii. 2,000 acre-feet subsequent to the first wet year in which the outlet is operated to release the flows specified in Table 1; and

  iv. 2,000 acre-feet subsequent to the second wet year in which the outlet is operated to release the flows specified in Table 1.

  The schedule above describes milestones to note the first time the additional water will be available for export. However, depending on hydrologic conditions, if the full 4,000 af or 2,000 af increments cannot be taken in the first year after reaching the relevant milestone, additional aliquots may be taken over more than 4 years. The total additional export would not exceed 12,000 af.

Table 1 footnote:

[1] Peak flows for SEF in Wet/Normal to Extreme-Wet Year-Types have a +/- 50 cfs error due to estimation error of the peak from reservoir storage volumes.

Note: LADWP will manage its Mono Basin stream flow operations by making releases targeting the prescribed SEFs, generally within a +/- 10 percent range of accuracy. Additionally, for specific protection of ecosystem attributes during fall and winter, LADWP will manage stream flow operations within the prescribed SEF minimum and maximum flowrates, generally within a +/-10 percent range of accuracy.

Table 2 revised to note that SRF Peak Flows are allowed to pass in Dry/Normal I and Dry/Normal II years.

Section 1.4.5:

Flows from GLR are controlled by an existing 74-year-old outlet control valve. Based on its age, and the recommendation of the California Department of Water Resources Division of Safety of Dams (DSOD), valve replacement is proposed. After construction of the spillway modification, the existing 48-inch roto valve, 48-inch gate valve access platform, venturi meter piping, and support piping for electrical, air and communications would be removed. New facilities would include: rotary cone valve (RCV), 48-inch knife gate valve, 48-inch dismantling joint (coupling), 48-inch butterfly valve, and a new flow meter upstream and downstream of Shaft No. 1 to measure combined flows to the MGORD and the Mono Craters Conduit. Flows to the MGORD would be maintained during the valve replacement construction period using barge-mounted pumps to discharge water from GLR to the water bypass pipeline. A temporary bypass pipeline (high-density polyethylene, 16- to 20-inch diameter, approximately 1 mile in length) would be installed from GLR to the MGORD, along the shoulder of an existing on-site roadway and within an existing 250-ft U.S. Forest Service (USFS) right-of-way (**Figure 6**). The bypass pipeline would be removed as soon as flows can be restored to Grant Lake ~~Export~~ Outlet Tunnel via the new RCV. At the end of construction, the USFS roadways would be inspected, and regraded and reseeded, as necessary.

Section 1.4.6:

During construction of the proposed project, temporary modification of Rush Creek peak SEFs and GLR storage targets may be necessary, depending on year-type. If such temporary modification is required, outflows will be operated on a State-approved flow and storage variance.

Section 1.4.7:

To offset the capital cost of constructing the spillway modification, the proposed Licenses include a provision allowing LADWP to export a total of an additional 12,000 af (in addition to the exports outlined in D1631) of water from the Mono Basin. This additional export would be allowed when Mono Lake is at or above 6,380 and below 6,391 ft amsl, when exporting the additional water would not affect compliance with minimum stream flows and GLR storage requirements, and in increments specified in the proposed Licenses associated with achieving spillway modification milestones. Note that the GBUAPCD air quality model predicted that a 6,391 ft amsl lake level would bring the Mono Basin into attainment for PM_{10} but that D1631 set an average management level 1 foot higher (6,392 ft amsl).

Section 1.4.8 paragraphs 5, 6, 7 and 8:

Mono Lake Elevation Modeling and Calibration. In D1631, the SWRCB noted that the record indicates that an average Mono Lake water elevation of 6,391 ft amsl is consistent with protection of public trust resources including: air quality in the Mono Basin; water quality in Mono Lake; the Mono Lake brine shrimp and brine fly which provide food for migratory birds; secure, long-term nesting habitat for California gulls and other migratory birds; easily accessible recreational opportunities for the large number of visitors to the Mono Lake Tufa State Reserve; and the panoramic and scenic views which attract many people to the Mono Basin. D1631 noted that if the lake has not reached 6,391 ft amsl elevation by September 28, 2014, the SWRCB will hold a hearing to consider the condition of the lake and the surrounding area, and to determine if further revisions to LADWP's Licenses are appropriate. The Settlement Agreement ~~set~~ continued that trigger ~~the hearing~~ date ~~at~~ until September 28, 2020. Mono Lake has not reached the 6,391 ft amsl target elevation to date and a hearing has not been held.

Mono Lake elevation, and changes in elevation, are largely a reflection of basin hydrology and climatology. Drier conditions lead to lake elevation recessions, and wetter conditions typically lead to increases in lake elevation. The link between climate variability and surface-elevation changes on Mono Lake is well-documented in scientific literature, with numerous studies describing the history of lake-elevation fluctuations on Mono Lake in response to long-term climate fluctuations (Bacon et al., 2018; Stine, 1994; Mensing et al., 2008; Cook et al., 2010). The published literature supports a link between the elevation of ~~the shoreline of~~ Mono Lake and regional trends in precipitation and temperature. For example, from 1700 to 1941, changes in the hydrologic balance of Mono Lake are well correlated with snowpack levels in the Sierra Nevada Range (Benson et al., 2003). Additionally, fluctuations in the shoreline between ~850-1250 correlate with temperature and aridity fluctuations occurring during the Medieval Climate Anomaly (Stine, 1994). Farther back in time, the Marina low stand of Mono Lake (~143; Stine 1990) corresponds to the Late Holocene dry period (~850 BCE -100 CE; Mensing et al., 2013). Therefore, it is likely that the current ~~shoreline~~ lake level fluctuations are strongly affected by recent trends in precipitation and temperature. The precipitation records from the Great Basin area show that the years preceding the diversion of water from Mono Lake by LADWP were generally wetter than average (Cook et al., 2004, using Western Regional Climate Center data), which would have influenced the ~~shoreline~~ lake level and created a local high stand. However, recent droughts (e.g., from 2001-2004, 2007-2010, and 2012-2016) coupled with higher average temperatures (up to 4°F higher on average compared to the 1940s) favor conditions that would create a local low stand of the Mono Lake shoreline.

Mono Lake has risen 8 feet since D1631~~, and per the SWRCB, rising lake levels continue to protect public trust resources balanced in D1631~~. The Settlement Agreement noted that Mono Lake will continue, on average, to rise towards 6,391 feet amsl, and the trend in lake level remains within the ranges previously forecast by the SWRCB for this transition period.

To improve the understanding of forecasting Mono Lake surface elevation, Watercourse Engineering conducted a suite of studies to address questions regarding Mono Lake elevation and associated export (Appendix E):

- Revisiting the Los Angeles Aqueduct Monthly Program (LAAMP) model used in developing the 1994 Mono Basin EIR for D1631 - The LAAMP assessment provides insight into the time to transition estimate based on the D1631 EIR analyses given that Mono Lake is approximately halfway to the post-~~-~~transition trigger elevation of 6,391 ft amsl after more than 25 years.

Section 2.2.3 a) paragraph 2:

> Although GBUAPCD currently does not have a federally enforceable SIP for Mono Basin, the 1995 Mono Basin PM_{10} SIP (GBUAPCD 1995; withdrawn in 2019) is still the most relevant air quality plan for the project area. The focus of the 1995 SIP is maintenance of specific water level elevations at Mono Lake to reduce dust emissions along the north shoreline. The SIP demonstrates how the NAAQS will be attained and claims that raising the lake level to a target elevation of 6,391 ft amsl would submerge or wet most of the exposed lakebed areas that were believed to produce the majority of windblown dust emissions. D1631 amended the City's Water Rights Licenses in the Mono Basin to require an increase in the surface level of Mono Lake to 6,391 ft amsl to, among other goals, meet clean air standards by submerging sources of windblown PM_{10}. Since development of the SIP, lake level has fluctuated between 6,378 and 6,384 ft amsl and has not met the transition water level elevation of 6,391 ft amsl (Mono Basin Clearinghouse, 2020). Based on eSTREAM modeling, additional export of up to 12,000 af, as included in the proposed Licenses, would not substantially impact the time it takes for Mono Lake to reach 6,391 ft amsl. The average time it takes to reach transition is estimated at approximately 22 years for both the Without Additional Export Case (no additional export of 12,000 af) and the With Additional Export Case (Appendix E). As described in Appendix E, updated eSTREAM modeling under the terms of the proposed Licenses estimates that during the forecasted 40 years following attainment of the transition elevation, the target surface elevation of 6,391 feet amsl on Mono Lake would be met, on average, only one year in four (Table 5).

Section 2.3.4 a) last paragraph:

Additional water export included in the proposed Licenses would not substantially impact the time it takes for Mono Lake to reach 6,391 feet amsl (the post-transition trigger ~~water~~ level ~~elevation~~) (Appendix E) and therefore would not substantially impact sensitive species present at Mono Lake. The Licenses would provide a new funding mechanism for habitat restoration projects (e.g., stream channel maintenance and waterfowl habitat restoration), a beneficial impact. Continuation of monitoring programs as prescribed by the Licenses would be similar to existing conditions and would not adversely impact sensitive species.

Section 2.3.4 b) and c) last paragraph:

Additional water export included in the proposed Licenses would not substantially impact the time it takes for Mono Lake to reach 6,391 feet amsl (the post- transition ~~water~~ trigger level ~~elevation~~) (Appendix E) and therefore would not substantially impact sensitive vegetation types present at Mono Lake. The Licenses would provide a new funding mechanism for habitat restoration projects (e.g., stream channel maintenance and waterfowl habitat restoration), a beneficial impact. Continuation of monitoring programs as prescribed by the Licenses would be similar to existing conditions and would not adversely impact sensitive vegetation types. Therefore, construction and operation of the project would have a less than significant impact on riparian habitat, wetlands, or other sensitive natural communities.

Section 2.3.4 d) last paragraph:

Additional water export included in the proposed Licenses would not substantially impact the time it takes for Mono Lake to reach 6,391 feet amsl (the post- transition ~~water~~ trigger level ~~elevation~~) (Appendix E) and therefore would not substantially impact migratory species or nursery sites present at Mono Lake. The Licenses would provide a new funding mechanism for habitat restoration projects (e.g., stream channel maintenance and waterfowl habitat restoration), a beneficial impact. Continuation of monitoring programs as prescribed by the Licenses would be similar to existing conditions and would not adversely impact migratory species.

Section 2.3.4 f):

Less Than Significant Impact with Mitigation Incorporated. The project site is not within a Natural Community Conservation Plan area as defined by California Fish and Game Code §2800. LADWP prepared a Habitat Conservation Plan (HCP) for LADWP-owned lands in Inyo and Mono Counties (LADWP, 2015b). The HCP has been reviewed by USFWS and federal approval is pending as of ~~October~~ March 2021~~0~~. When approved, the seven species that will be federally covered under this HCP are Owens Pupfish (*Cyprindon radiosus*), Owens Tui Chub (*Siphateles bicolor snyderi*), Owens/Long Valley Speckled Dace (*Rhinichthys osculus* spp), bi-state population of Greater Sage-Grouse (*Centrocercus urophasinus*), Yellow-billed Cuckoo (*Coccyzus americanus*), Willow Flycatcher (*Empidonax traillii*), and Bell's Vireo (*Vireo bellii*). LADWP manages the activities on its lands such as habitat restoration, recreation, control of noxious and invasive weeds, fire suppression, infrastructure maintenance, and the management of water gathering and power production/distribution in a manner that is compatible with the conservation of these seven species. Of these species, the Willow Flycatcher and Greater Sage-Grouse have potential to occur onsite. With implementation of the mitigation measures described below impacts on habitat conservation planning would be less than significant.

Sections 2.3.5 and 2.3.18:

Changes have been made to reduce the specificity of the information provided.

Section 2.3.10 paragraph 2:

Management of the hydrology of the four Mono Basin streams is the intent of the proposed project. For Walker Creek and Parker Creek, implementation of the proposed Licenses would not alter existing conditions since these streams ~~are not currently~~have not been diverted by LADWP since 2015. For Rush Creek and Lee Vining Creek, stream hydrology would be managed as described

Section 2.3.18 paragraph 4:

On January 14, 2015~~4~~, Mr. Raymond Andrews, Tribal Historic Preservation Officer of the Bishop Paiute Tribe, telephoned GANDA to inquire about the project and request more information about the nature of proposed ground disturbances in the project area.

Section 2.3.18 last paragraph under Native American Outreach:

On September 28, 2015, LADWP requested a CEQA Tribal Consultation List per Assembly Bill 52 from the NAHC. Letters were subsequently sent to all tribal representatives on the NAHC list on November 4~~1~~7, 2015 giving them the opportunity to request formal consultation. Formal tribal consultation requests were received from three tribes on the NAHC list: The Big Pine Paiute Tribe of the Owens Valley, The Bishop Paiute Tribe, and the Mono Lake Kutzadika'a Tribe. An additional meeting was held in Bishop with the Bishop Paiute Tribe on January 6, 2016. Two separate in-person meetings were held with the Big Pine Paiute Tribe and the Mono Lake Kutzadika'a Tribe on January 7, 2016. A request for consultation was received from Ms. Lange on March 6, 2017. LADWP shared project information via a letter on April 3, 2017. LADWP staff also spoke by phone with Ms. Lange on June 9, 2019. An in-person meeting was held with the Big Pine Paiute Tribe, the Bishop Paiute Tribe, and the Mono Lake Kutzadika'a Paiute Indian Community on June 11, 2019 at the Mono Lake Indian Community Center. A virtual meeting was held with the Mono Lake Kutzadika'a Tribe on December 29, 2020, and with the Bishop Paiute Tribe on February 1, 2021. –Consultation is ongoing and will extend through project development and construction.

Appendix E Mono Lake Elevation Studies Technical Memorandum

Section 2.3 paragraph 2:

When the original model was applied using more recent hydrology, simulated WSE varied significantly from historic WSE (Figure 3). The difference in WSE at the end of the simulation (March 31, 2020) was 4.6 feet, which translates to approximately 210,000 acre-feet of storage. Recall that RY1941 to RY1989 were used to develop the ungaged inflow term in the Mono Lake water balance equation. During this time Mono Lake declined from an elevation of approximately 6,418 ft msl to approximately 6,375 ft msl – a decline of 43~~2~~ feet. During RY1990 to RY2019, lake elevations experienced periods of increases and declines, indicating that general basin conditions may no longer be consistent with the RY1941 to RY1989 period.

Section 4.3.1 paragraph 5:

Finally, Mono Lake water surface elevations barely exceeded the transition target in some instances (e.g., the April 1 elevation was 6,391.1 ft); however, in the model logic, transition is achieved when the elevation is at or above 6,391 ft regardless of the amount in excess. Thus, small differences in estimated Mono Lake elevations can have significant impacts on the model results. Consider Figure 11~~Figure 11 Figure 2~~, where the 1980-2019 sequence is used as a forecast from April 1, 2019 into the future. The starting elevation was assumed 6380.6 ft amsl based on ~~each model run began~~ April 1, 2020~~in 2016~~. When additional export was allowed, the water surface elevation on

Revision of Figure 11 (Mono Lake water surface elevation for the runs that started in 2016 without (blue line) and with (red line) additional export)