

January 13, 2003

Comment Letter No. 211

Mr. Clarence Martin
Los Angeles Department of Water and Power
300 Mandich Street
Bishop, CA 93514

Dear Mr. Martin,

I am writing to comment on the Lower Owens River Project Draft Environmental Impact Report and Environmental Impact Statement.

I appreciate the great potential of the LORP. However, the DEIR/EIS fails to describe essential components of the project and presents project alternatives that directly violate the 1991 Long Term Water Agreement and the established project goals. Some of my concerns include:

- 211-1) Size of the pump station and delta flows: A 150 cfs pump station violates the Inyo-LA 1991 Water Agreement. LADWP has not justified using a larger pump station that is three times larger than the water agreement allows. A larger pump station won't allow enough water to reach the Delta and may help LADWP to pump more groundwater from the valley. LADWP should select the 50 cfs pump station and 9 cfs annual average delta baseflows. This option allows the maximum amount of water flow to the delta under the agreements and approaches current flows. This is needed to meet the delta habitat goal of maintaining existing and new delta habitats for waterfowl and to comply with the Water Agreement.
- 211-2) Funding: Monitoring and adaptive management are absolutely essential to the success of the LORP, but the DEIR/EIS repeatedly states that funding limitations may prevent their full implementation. To meet its obligations, LADWP should select funding option 2, which is the only option that adequately funds the LORP.
- 211-3) Recreation plan: There is no recreation plan in the DEIR/EIS, nor is there a description of current and anticipated recreational uses of the LORP area. The document should contain a thorough assessment of current and potential recreational use in the LORP area and a plan to manage that recreation in order to protect natural habitats and cultural resources.

Mr. Martin, the LORP is a valuable project, and I want it to work. I urge LADWP to abide by the terms of the Water Agreement and the goals of the project, thoroughly describe all management plans to the public, choose the least environmentally damaging alternatives, and guarantee adequate funding.

Thank you for your consideration of my comments.

Sincerely,

Mary Vocelka

MARY VOCELKA
2433 APACHE DRIVE
BISHOP CA 93514-1997
873-4480

RECEIVED
JAN 13 2003
AQUEDUCT MANAGER
SHOP ADMINISTRATIVE OFFICE

Mr. Clarence Martin
Los Angeles Department of Water and Power
300 Mandich Street
Bishop, CA 93514

Dear Mr. Martin,

I am writing to comment on the Lower Owens River Project Draft Environmental Impact Report and Environmental Impact Statement.

I appreciate the great potential of the LORP. However, the DEIR/EIS fails to describe essential components of the project and presents project alternatives that directly violate the 1991 Long Term Water Agreement and the established project goals. Some of my concerns include:

212-1 1) Size of the pump station and delta flows: A 150 cfs pump station violates the Inyo-LA 1991 Water Agreement. LADWP has not justified using a larger pump station that is three times larger than the water agreement allows. A larger pump station won't allow enough water to reach the Delta and may help LADWP to pump more groundwater from the valley. LADWP should select the 50 cfs pump station and 9 cfs annual average delta baseflows. This option allows the maximum amount of water flow to the delta under the agreements and approaches current flows. This is needed to meet the delta habitat goal of maintaining existing and new delta habitats for waterfowl and to comply with the Water Agreement.

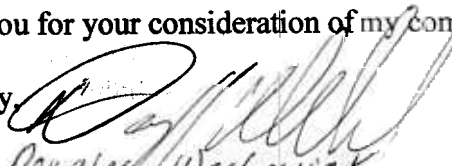
212-2 2) Funding: Monitoring and adaptive management are absolutely essential to the success of the LORP, but the DEIR/EIS repeatedly states that funding limitations may prevent their full implementation. To meet its obligations, LADWP should select funding option 2, which is the only option that adequately funds the LORP.

212-3 3) Recreation plan: There is no recreation plan in the DEIR/EIS, nor is there a description of current and anticipated recreational uses of the LORP area. The document should contain a thorough assessment of current and potential recreational use in the LORP area and a plan to manage that recreation in order to protect natural habitats and cultural resources.

Mr. Martin, the LORP is a valuable project, and I want it to work. I urge LADWP to abide by the terms of the Water Agreement and the goals of the project, thoroughly describe all management plans to the public, choose the least environmentally damaging alternatives, and guarantee adequate funding.

Thank you for your consideration of my comments

Sincerely,


Douglas Wachowiak
79 Ponderosa St.
Chalfant Valley 93514

RECEIVED

JAN 10 2003

CONDUCT MANAGER
LORP ADMINISTRATIVE OFFICE

Dr. Nancy Peterson Walter
John H Walter
PO Box 2383
Mammoth Lakes
CA 93546

Jan 13, 2003

Mr. Clarence Martin
Los Angeles Dept. of Water and Power
300 Mandich St.
Bishop, CA 93514

Dear Mr. Martin:

Thank you for the opportunity to comment on the Lower Owens River Project (LORP) draft Environmental Impact Report (DEIR) and Draft Environmental Statement (DEIS). As Los Angeles and Eastern Sierra residents for over 45 years we have personally witnessed the deterioration of the Owens Valley due to the LADWP water diversions. We were also delighted when LADWP agreed as partial mitigation for the damage done to implement the LORP, including rewatering and restoring over 60 miles of the lower Owens, to create new habitat for water fowl and other wildlife and to greatly improve the warm water fishery. Our children and we have often enjoyed the free flowing stretch of the Owens above Big Pine and have been looking forward to introducing our grandchildren to the new restored stretch along with the other enhancements that we understood were to be completed by LADWP.

We are very concerned that the DEIR and DEIS do not seem to agree with what we understood were the terms of the agreement. In spite of being about 2 years late the documents are incomplete. The major problems and inadequacies are:

- 213-1 | 1. Preference for a 150 cfs pumpback station instead of the previously agreed on 50 cfs station.
- 213-2 | 2. Full funding for monitoring and adaptive management should be provided without the contingencies of funding availability called out in the documents.
- 213-3 | 3. The Documents lack a recreation plan that should be provided.

213-4 | The 150 cfs pumpback station can only be justified economically if it is used to transport additional water pumped from lands that are not currently utilized for water production. Even the remotest possibility of developing additional areas of water production in the Owens Valley is completely unacceptable. LADWP has worked hard to try to regain the trust of the Valley residents. How can LADWP risk losing the headway it has made in this area for such a minor point particularly since it is of questionable economic value? Higher pumpbacks just to recover the few weeks of Spring flow will also lead to damage to the habitat that has developed on the delta as a result of natural Spring flows in the river. Causing further damage should be considered unacceptable on a mitigation project. In order to preserve this habitat the flows in the delta should have a minimum flow rate of 9 cfs.

RECEIVED

JAN 13 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

213-5

It is essential that the LORP be adequately funded including the monitoring and adaptive management. The two later issues are essential to the success of the project. It is incomprehensible that they should be left to the vagaries of non-LADWP funding sources.

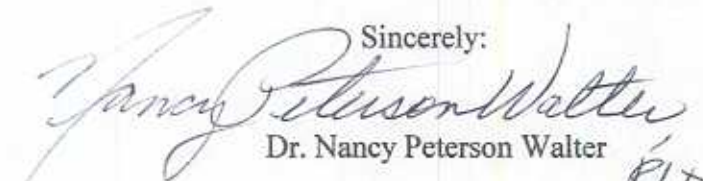
213-6

Properly considering recreation in the plans and in the ultimate implementation is essential. Recreation is the lifeblood of the Owens Valley economy in addition to being the lifeblood of what brings many of us here. A balance between these needs and the need of the fauna and wildlife must be reached.

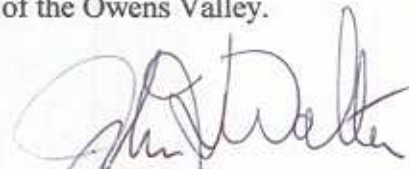
Making these corrections and clarifications to the plan should actually simplify the plan making it quicker and cheaper to accomplish. Further slippage in the schedule should not be allowed.

We hope that LADWP will do the right thing and go back to the policy it seemed to be moving toward ten years ago of listening the people of the Owens Valley.

Sincerely:



Dr. Nancy Peterson Walter
PhD



John H. Walter

CC Inyo County Board of Supervisors

January 10, 2003

Los Angeles Department of Water and Power
Attn: Clarence Martin
300 Mandich St.
Bishop, CA 93514

Re: Comments pertaining to the Lower Owens River Project (LORP) Draft Environmental Impact Report / Statement (DEIR/S)

Dear Mr. Martin:

As a resident of the community of Independence, CA, I am very interested in the successful completion and implementation of the LORP. I would like to take this opportunity to make a few comments on the above mentioned document. I feel the DEIR/S fails to describe certain aspects of the project which are crucial to its successful implementation. The following points have been arranged in a bulleted fashion.

- 214-1 -I strongly support the 50 cubic feet per second (CFS) pump station. The Los Angeles Department of Water and Power (LADWP) agreed to a maximum 50 cfs pump station in 1991 to alleviate Owens Valley residents' fears that the LORP would be used to export more groundwater. It is only appropriate LADWP drop the entire issue of the 150 cfs pump station.
- 214-2 -Maintain the 9 cfs flows to the River Delta. Within the DEIR/S, LADWP proposes to reduce the flows to the Delta. Lower flows will not maintain existing Delta habitats and are unlikely to create new habitats as required by the LORP goals.
- 214-3 -Funding option #2 is the best option to ensure the successful implementation of the LORP. LADWP is legally required to periodically assess how well the LORP is working and utilize 'adaptive management' accordingly. It is crucial that funding be available to adequately address cultural issues, noxious weed issues, beaver dams, tule control, and mosquito control—as well as a number of other issues.
- 214-4 -It is very concerning that a recreation plan is not mentioned in the document. Considering the incredible cultural resources and the fragility of our high desert environment, it seems only appropriate that a recreation plan be in place to be pro-active, rather than reactive.

Recognize the LORP as strictly a mitigation project and do not alter it to suit LADWP's motives (pumping more groundwater from the Owens Valley). Thank you for the opportunity to comment.

Sincerely,



Jason Warren

cc: Inyo County Board of Supervisors

RECEIVED

JAN 13 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

Samuel R. Wasson
385 Laws Ave.
P.O. Box 223
Keeler, Ca. 93530

Mr. Clarence Martin
Los Angeles Dept. of Water & Power
360 Mandich St.
Bishop, Ca. 93514

January 14, 2003

Re: EIR/EIS Lower Owens River Project-Mosquito Hazard

Dear Mr. Martin

The year, 2002, was the worst year in recent memory for mosquito infestation in Keeler. Mosquitoes are a known public health issue. They can transmit diseases such as West Nile Virus; encephalitis and malaria to humans, and a variety of diseases to wildlife and domestic animals.

215-1 The recently completed Zone 2 of the Owens Lake Dust Control Project; the proposed 10.45 square mile dust control project between Keeler and the Owens River Delta and the LORP will combine into a very large mosquito breeding area.

In the final EIR/EIS of the Lower Owens River Project; please address the on going mitigation of mosquito breeding areas on the Owens Lake and a mosquito control program to protect the public.

Thank you for the opportunity to comment on this great restoration project.

Sincerely,

Samuel R. Wasson

Samuel R. Wasson
Keeler Resident

RECEIVED

JAN 14 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

Mr. Clarence Martin
Los Angeles Department of Water and Power
300 Mandich Street
Bishop, CA 93514

Dear Mr. Martin,

I am writing to comment on the Lower Owens River Project Draft Environmental Impact Report and Environmental Impact Statement.

I appreciate the great potential of the LORP. However, the DEIR/EIS fails to describe essential components of the project and presents project alternatives that directly violate the 1991 Long Term Water Agreement and the established project goals. Some of my concerns include:

- 216-1 1) Size of the pump station and delta flows: A 150 cfs pump station violates the Inyo-LA 1991 Water Agreement. LADWP has not justified using a larger pump station that is three times larger than the water agreement allows. A larger pump station won't allow enough water to reach the Delta and may help LADWP to pump more groundwater from the valley. LADWP should select the 50 cfs pump station and 9 cfs annual average delta baseflows. This option allows the maximum amount of water flow to the delta under the agreements and approaches current flows. This is needed to meet the delta habitat goal of maintaining existing and new delta habitats for waterfowl and to comply with the Water Agreement.
- 216-2 2) Funding: Monitoring and adaptive management are absolutely essential to the success of the LORP, but the DEIR/EIS repeatedly states that funding limitations may prevent their full implementation. To meet its obligations, LADWP should select funding option 2, which is the only option that adequately funds the LORP.
- 216-3 3) Recreation plan: There is no recreation plan in the DEIR/EIS, nor is there a description of current and anticipated recreational uses of the LORP area. The document should contain a thorough assessment of current and potential recreational use in the LORP area and a plan to manage that recreation in order to protect natural habitats and cultural resources.

Mr. Martin, the LORP is a valuable project, and I want it to work. I urge LADWP to abide by the terms of the Water Agreement and the goals of the project, thoroughly describe all management plans to the public, choose the least environmentally damaging alternatives, and guarantee adequate funding.

Thank you for your consideration of my comments.

Sincerely,

Carol Wells
1503 Dunbar Lane
Bishop, CA 93514

RECEIVED

JAN 10 2003

CONDUCT MANAGER
SHOP ADMINISTRATIVE OFFICE

MBM PROPERTIES

P. O. Box 5005, Mammoth Lakes, CA 93546
 (760) 934-9668, marshalle@earthlink.net

January 9, 2003

Mr. Clarence Martin
 Los Angeles Department of Water and Power
 300 Mandich Street
 Bishop, CA 93514

Dear Mr. Martin,

I am writing to comment on the Lower Owens River Project Draft Environmental Impact Report and Environmental Impact Statement.


I appreciate the great potential of the LORP. However, the DEIR/EIS fails to describe essential components of the project and presents project alternatives that directly violate the 1991 Long Term Water Agreement and the established project goals. Some of my concerns include:

- 217-1) Size of the pump station and delta flows: A 150 cfs pump station violates the Inyo-LA 1991 Water Agreement. LADWP has not justified using a larger pump station that is three times larger than the water agreement allows. A larger pump station won't allow enough water to reach the Delta and may help LADWP to pump more groundwater from the valley. LADWP should select the 50 cfs pump station and 9 cfs annual average delta baseflows. This option allows the maximum amount of water flow to the delta under the agreements and approaches current flows. This is needed to meet the delta habitat goal of maintaining existing and new delta habitats for waterfowl and to comply with the Water Agreement.
- 217-2) Funding: Monitoring and adaptive management are absolutely essential to the success of the LORP, but the DEIR/EIS repeatedly states that funding limitations may prevent their full implementation. To meet its obligations, LADWP should select funding option 2, which is the only option that adequately funds the LORP.
- 217-3) Recreation plan: There is no recreation plan in the DEIR/EIS, nor is there a description of current and anticipated recreational uses of the LORP area. The document should contain a thorough assessment of current and potential recreational use in the LORP area and a plan to manage that recreation in order to protect natural habitats and cultural resources.

Mr. Martin, the LORP is a valuable project, and I want it to work. I urge LADWP to abide by the terms of the Water Agreement and the goals of the project, thoroughly describe all management plans to the public, choose the least environmentally damaging alternatives, and guarantee adequate funding.

Thank you for your consideration of my comments.

Sincerely,



Marshalle Wells
 Mammoth Lakes, CA 93546

RECEIVED

JAN 10 2003

AQUEDUCT MANAGER
 SHOP ADMINISTRATIVE OFFICE

P.O. Box 554
 Ridgecrest, CA 93556-0554
 10 January 2003

Clarence Martin
 LADWP
 300 Mandick Street
 Bishop, CA 93514
 FAX 760 873-0266

Comments on LORP Project Draft EIR/EIS

How wonderful that water may again flow along the Owens River bed all the way to the lake! It is too bad that the project isn't ready to go this spring to take advantage of all the extra snow melt this El Niño year will bring! - or perhaps you can let it run into the river bed and start soaking up the ground. I wish the whole river could look like the cover photo on your DEIR....

218-1

1. Pumpback station - if you are going to put 40 cfs into the river (and once the ground is soaked up) and about that much reaches your pumps, a 50 cfs pump station should be adequate to "reclaim" the river water and yet allow for at least 9 cfs to flow out into the delta area. Extra waters from unusual spring runoffs can be useful in the valley and in the delta area, and can go out on to the lakebed like they have every El Niño year in the past. There is not justification (or trust that it won't be used for other purposes) for a larger plant which would use more power, cost more to put in, and not pay for itself as easily as the smaller unit for which you already have enough power from Cottonwood Plant upgrade. (Section 10.6).

218-2

2. In reading your charts, you say that there may be less than 9 cfs flowing into the delta below the pump station. Based on all the area you intend to modify in the delta and natural areas now wet, it seems that a minimum of 9 cfs will be needed, and more would be better, not just "6 to 9 cfs" leaning more toward the 6 cfs number.

218-3

3. Increased Recreation: Section 10.1.2 "no changes to current recreational uses are proposed". No way! It is certain that there will be many more visitors to your land once the river is rewatered - both for fishing, bird watching, and just to enjoy the river scene for a picnic lunch. Your plan does not address increased visitation and it must before you have a problem you can't control. There are bound to be interesting archeology areas as well, as the Owens Valley Paiute Indians surely camped along stretches of the lower river. Some mention and a protection plan for archeology sites needs to be included. People are going to want to bring their RV's out by the river. People are going to ride ATV's all over the area. Will boating be allowed on the river? Will guns be allowed on LADWP lands? Will hunting be allowed as it is now? (I hope not). Please provide adequate toilet facilities near every road access to the river area. Provide some organized picnic areas and trash service to prevent unorganized dispersal and increased trash all over the area. The maps, controlled access, toilets and trash cans you have provided around Haiwee Reservoir seem to work well to control the fishing people who come. How will you patrol? Will overnight use be allowed??? More folk will be using the County Campgrounds, can you help fund that? Get ahead of the mobs that will surely come to see the river flow again!

You are building it, they WILL come!!

RECEIVED

JAN 15 2003

AQUEDUCT MANAGER
 BISHOP ADMINISTRATIVE OFFICE

*6048
 1/13*

218-4

4. Grazing; with water in the river, the cattle will not be able to roam where they have roamed before. It is so important to make sure that cattle cannot access the river itself or they will cause the same sorts of destruction to river banks and water pollution that they cause everywhere else. Your DEIR does not address this situation at all. You'll need to look at grazing leases, river access, plans to keep cattle out of the river corridor, off archeology sites, etc.

218-5

5. Increased water will lead to increased Tamarisk growth. (Section 10.4.2) It's there now, it will spread. It is most important that there be a funding plan to assure that tamarisk can be controlled and maybe even eradicated from the Owens Valley. It is NOT "unmitigatable!" It's a lot of work, but Death Valley has had great success in removing Tamarisk from their springs through persistence in cutting and burning programs. There is no other tree which can pump so much water into the air, or which can outcompete the native cottonwood/willow riparian vegetation that this foreign invader. Please include funding to fully implement a treatment program 100% in the event Inyo County cannot also help with funding. (Section 10.8) It benefits you by making sure more water gets to your pumpback station.

218-6

6. Because of so much prior disturbance, habitat change, and now habitat change again, there will be lots of noxious weeds invading the area. They threaten not only the native vegetation, but the crops your leasers grow along the valley. The same funding assurances mentioned above must also be provided to control non-native weeds 100%.

218-7

7. Your EIR mentions "monitoring and adaptive management", but there isn't much of any plan to do so. Your final EIR should have specifics - what do you intend to monitor? How? For what? And what management plans will you have to work on problems as they arise? You specifically mention Tamarisk and weeds, but what about tule and cattails which may need some help to be controlled? I'd rather see Beaver left alone, but they too may need to be encouraged to stay out of the river and live elsewhere. Cowbirds may increase, may not, but they should be monitored. They weren't previously in the valley, but they and yellow-headed blackbirds are increasing in populations now.

218-8

8. Mosquitoes (Section 10.3.2) will love this project, so many more flooded areas for them to breed in. Again, insure there is adequate funding for the Owens Valley Mosquito Abatement District to be able to do what is needed. I would hope that Mosquito Fish will be used where they don't compete with Tui Chub or pupfish, but there are dozens of other methods that can be used as well and hopefully insectivorous birds and bats will help the problem, but there needs to be adequate funding above this to make sure it doesn't become a problem. (Section 10.8) West Nile Virus and other diseases are no fun!

218-9

9. The Audubon Society (among others) points out that Owens Lake is a part of the U.S. Shorebird Conservation Plan. You know this because you've had to deal with Snowy Plover nests on the Owens Lakebed in relation to the projects you are doing there. The delta area and plans for this DEIR should address shorebirds as well. More migratory birds than ever will use the Owens Valley as a stopping/resting/feeding area once there is a reliable water source both in the river, ponds, and in the delta area (and on the spreading ponds on the lake itself). This whole topic needs addressing. You don't cross-reference to the Lake projects at all and should since this one will affect that one.

218-10

10. Unavoidable consequences of LORP (Executive Summary #3) - I find it interesting that you choose to mention that 2343 acres of alkali scrub and 531 acres of alkali

218-10

meadows will be 'harmed'. These are not the habitats which were there before the water was taken from the river - these are basically "invading" habitats. You will be restoring these areas to former conditions, not "causing unavoidable conversions". Likewise, rewatering will once again allow vegetation to cover the now "barren areas". Why not make these sections of your EIR look favorable to you, rather than their gloomy wording as now stands?

218-11

11. Alternatives from Table S-2

Release Regimes; what did you learn from rewatering Rush Creek and the Owens Gorge? It seems like the river systems can take care of themselves pretty well - ramp up the water flows fairly quickly and let nature do what comes next. Don't delay releases. Don't over-engineer the project - nature does usually OK when left alone.

Do NOT reduce existing flows into the Delta area.

Do worry about mosquitoes, *Tamarisk*, and weeds.

218-12

12. Section 10.5.2, Table 10-7. There is no mention of the possibility of cutting down on water used for irrigation or water used for stock as a means of balancing the water which might be needed to keep the steady state in the river flowing at 40 cfs. You could at least propose changes to the current practices. Also water conservation by those users could be mentioned. The sprinklers currently used to irrigate the alfalfa fields on your lands are horribly wasteful of water. There are better ones available.

218-13


13. This project is not separate from things learned by the projects you (LADWP) are currently doing on the Owens Lakebed, nor from the LeeVining/Rush Creek and Owens Gorge rewatering projects. Why are there not cross-references to those projects? Spend more money assuring the monitoring and recreation uses will be funded in the Valley rather than so much on engineering flows, dikes, river channels, etc.

Thank you for the opportunity to comment on your project! I have lived in and traveled this area since 1950 and love the valley! I bring my Cerro Coso Natural History classes to the valley at least twice a year to look at all aspects of what is going on, and keep promising the students that "soon you will see water in this part of the river" - watch what happens when it does flow. I hope "soon" will come sooner, rather than later. It's time to heal the Valley ecosystems. Everyone will benefit.

Please send me a Black & White hard copy of the Final EIR/EIS when you have it done.

and CD?

Janet Westbrook
P.O. Box 554
Ridgecrest, CA 93556-0554


Janet Westbrook
Professor of Biology
Cerro Coso College

Bryce A. Wheeler
P.O. Box 3802

Mammoth Lakes, CA 93546

January 10, 2003

760 934-3764

Mr. Clarence Martin
Los Angeles Dept. of Water and Power
300 Mandich Street
Bishop, CA 93514

Dear Mr. Martin,


My comments on the Lower Owens River Project (LORP) Draft Environmental Impact Report and Environmental Impact Statement (DEIR/EIS) are stated below.

I believe the Lower Owens River Project has great potential to benefit the local economy, to heal some environmental damage from water export since 1913, and to enhance recreation. If implemented properly, the LORP would restore 62 miles of the Lower Owens River and establish habitat for birds and wildlife. I'm sure you don't need to be reminded the LADWP is legally obligated to rewater the Lower Owens River and restore its habitat.

My concerns with the DEIR/EIS are:

- 219-1 1. The LADWP wants to have a 150 cfs pumpback station. In the 1991 Longterm Water agreement, LADWP agreed to a 50 cfs pumpback station and to provide a 9 cfs baseflow to the Owens River Delta. LADWP should abide by the agreement to have a 50 cfs pump.
- 219-2 2. The lower flows that LADWP proposes will not maintain existing habitats, and will not create new habitat as required by the LORP agreement.
- 219-3 3. LADWP proposes to dry up water flowing from the delta to Owens Lake (the transition to brine pool area) where it is used by thousands of waterfowl and shorebirds—the area designated a Nationally significant Important Bird Area by the National Audubon Society. This must not happen.
- 219-4 4. The LADWP must adopt Funding Option 22 in the DEIR/EIS to ensure full funding for the LORP. Full funding must be provided for adaptive management measures and for the monitoring that would trigger the measures. Without full funding, there would be no funding for salt cedar control, tule control, and beaver population control. Funding is critical for the success of the LORP.
- 219-5 5. With rewatering of the Lower Owens River, recreation will increase. The DEIR/EIS has no recreation plan. A recreation plan is required to ensure that cultural resources, the soil, water, habitat, and wildlife will be protected. A baseline of current conditions must be established to detect changes over time. ORV routes must be mapped. Illegal trash dumps, target shooting areas, and sites damaged by illegal fire use must be cleaned up.
- 219-6 6. Where does the LADWP expect to obtain the 16,000 acre-feet/year of water that will be needed above the current amount used in the river. Does the LADWP plan to pump more groundwater? Will the search for more water create more negative impacts to the environment of the Lower Owens River?

Please adopt the measures that will make the LORP a rousing success and do the job it is designed to do for the Lower Owens River.

Sincerely, 

cc: Inyo County Supervisors

RECEIVED

JAN 13 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

Los Angeles Dept. of Water and Power
Mr. Clarence Martin
300 Mandich Street
Bishop, Ca. 93514

Dear Mr. Martin,

I am writing to comment on the Lower Owens River Draft Environmental Impact Report and Environmental Impact Statement.

I believe that the 1991 Long term Water Agreement has established the goals that best satisfy the needs of the Owens Valley. There is no need for a larger pump back station than described unless L.A.D.W.P. plans to pump more ground water than is already allowed. The larger pump will only benefit L.A.D.W.P. and not the L.O.R.P., which in essence only returns the water back to its original course.

I also believe that the cost of the larger pump back station being proposed (150 cfs) will only hinder the ability of L.A.D.W.P. to comply with all the requirements described in the L.O.R.P. Furthermore I feel funding option #2 is the only option that addresses the concerns of myself and other like minded Owens Valley residents.

Thank you for your consideration.

Sincerely,

Charles D. Wheeler Jr.
P.O. Box 402
Big Pine, Ca. 93513



01-09-03

220-1

RECEIVED

JAN 13 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

Wilma A. Wheeler
P. O. Box 4008
Mammoth Lakes, CA 93546

January 7, 2003

Mr. Clarence Martin
Los Angeles Dept. of Water and Power
300 Mandich Street
Bishop, CA 93514

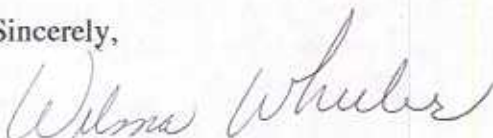
Dear Mr. Martin,

Please accept my comments on the Lower Owens River Project (LORP) Draft Environmental Impact Report/Statement DEIR/S. I am very interested in this project and am glad that the Draft EIR has finally been released and published for public comment. This project has great potential to help restore the habitat along the Lower Owens River. I believe, however, that the Draft EIR is inadequate in several regards.

- 221-1 1. Funding for the project: The project must be funded to be successful. Without adequate funding, all the goals and objectives cannot be accomplished. Monitoring and adaptive management are essential to the success of the LORP, but the DEIR/EIS states repeatedly that funding limitations may prevent their full implementation. The LADWP must select Funding Option 2 so the LORP will be adequately funded.
- 221-2 2. The LADWP want a 150 cfs pump station. This would violate the Inyo-LA 1991 Water Agreement, which provides for a 50 cfs pump station. LADWP must select the 50 cfs pump station to abide by the agreement. There is no justification for the larger station unless LADWP intends to pump more water than permitted under the agreement. Using the larger station, the amount of water to reach the delta would be inadequate. The larger station would also allow LADWP to pump
- 221-3 more groundwater than it is permitted. To maintain the delta habitat goal of maintaining existing and providing new delta habitat for waterfowl, and comply with the water agreement, LADWP must select the 50 cfs pump station and 9 cfs annual average delta baseflow.
- 221-4 3. There is no recreation plan in the DEIR/S. The DEIR/S does not have a description of current and anticipated recreational uses of the Lower Owens River area. It must have a plan to manage recreation in order to protect natural habitats and cultural resources.

The Lower Owens River Project is a valuable project and is long overdue. I and others in the Eastern Sierra want it to work. I ask the LADWP to abide by the terms of the water agreement and the goals of the project. Please amend the DEIR/S to include the above provisions. That will be doing the right thing for the people of Los Angeles, the people of the Owens Valley and Eastern Sierra and the environment of this sensitive and unique area, which has been so beneficial to the success of the Los Angeles Dept. of Water and Power.

Sincerely,



CC: Inyo Co. Board of Supervisors

RECEIVED

JAN 10 2003

AQUEDUCT MANAGER
SHOP ADMINISTRATIVE OFFICE

January 9 2003

Mr. Clarence Martin
Los Angeles Department of Water and Power
300 Mandich Street
Bishop, CA 93514

Dear Mr. Martin,

I am writing to comment on the Lower Owens River Project Draft Environmental Impact Report and Environmental Impact Statement.

I appreciate the great potential of the LORP. However, the DEIR/EIS fails to describe essential components of the project and presents project alternatives that directly violate the 1991 Long Term Water Agreement and the established project goals. Some of my concerns include:

222-1 1) Size of the pump station and delta flows: A 150 cfs pump station violates the Inyo-LA 1991 Water Agreement. LADWP has not justified using a larger pump station that is three times larger than the water agreement allows. A larger pump station won't allow enough water to reach the Delta and may help LADWP to pump more groundwater from the valley. LADWP should select the 50 cfs pump station and 9 cfs annual average delta baseflows. This option allows the maximum amount of water flow to the delta under the agreements and approaches current flows. This is needed to meet the delta habitat goal of maintaining existing and new delta habitats for waterfowl and to comply with the Water Agreement.


222-2 2) Funding: Monitoring and adaptive management are absolutely essential to the success of the LORP, but the DEIR/EIS repeatedly states that funding limitations may prevent their full implementation. To meet its obligations, LADWP should select funding option 2, which is the only option that adequately funds the LORP.

222-3 3) Recreation plan: There is no recreation plan in the DEIR/EIS, nor is there a description of current and anticipated recreational uses of the LORP area. The document should contain a thorough assessment of current and potential recreational use in the LORP area and a plan to manage that recreation in order to protect natural habitats and cultural resources.

Mr. Martin, the LORP is a valuable project, and I want it to work. I urge LADWP to abide by the terms of the Water Agreement and the goals of the project, thoroughly describe all management plans to the public, choose the least environmentally damaging alternatives, and guarantee adequate funding.

Thank you for your consideration of my comments.

Sincerely,


Steven M. White
388 Shepard Lane
Bishop, CA 93514

RECEIVED

JAN 10 2003

AQUEDUCT MANAGER
HQP ADMINISTRATIVE OFFICE

January 5, 2003

Mr. Clarence Martin
Los Angeles Department of Water and Power
300 Mandich Lane
Bishop, CA 93514

Dear Mr. Martin:

Thank you for the opportunity to comment on the Lower Owens River Project Draft Environmental Impact Report and Environmental Impact Statement. After reading this document (thanks to Judge Denton) I feel for the first time that this extremely beneficial undertaking is actually going to happen. Thanks to John Gray of URS Corporation and Leak Kirk of the Inyo County Department for their hard work and thanks to Gail Lewis of EPA for her help.

Los Angeles has committed to the goals of the 1991 Groundwater Agreement and the MOU. Now it needs to live up to those commitments.

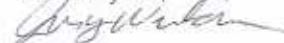
223-1 1) If LADWP had not arbitrarily and unilaterally decided to insist on a pump station of 150 cfs, for which there is no logical need, perhaps the project could have met its goal of water in the river by June of this year. Please drop this alternative and go with the 50 cfs pump station you originally agreed to.

223-2 2) Pleading lack of funds is difficult to swallow from a department with a yearly profit of over 100 million dollars a year. Letting monitoring and adaptive management for potential impacts such as weed control, tules, cattails, and beaver depend on "availability of funds" undermines the whole project. Funding Option One is mean-spirited. Please drop it.

223-3 3) The recreation plan is vague and inadequate. If the dream of rewatering is successful and the habitat is restored, it will surely be in danger of degradation from off-road vehicles, illegal camping and illegal campfires, "plinking," harassment of cattle and wildlife, lack of toilet and trash facilities. If the laissez-faire style of management at Klondike Lake is an example of LADWP recreation management, the LORP is in trouble.

223-4 4) As a birder I have done many surveys on the Delta. Despite being trampled by cattle and subject to arbitrary releases of water and drying up it still is a valuable area for shorebirds and waterfowl. Again, please use the 50 cfs pump station to allow the maximum amount of water to flow to the Delta.

Thank you,



Judy Wickman

101 Dominy Road
Lone Pine, CA 93545

cc. Inyo County Supervisors
Inyo Register

RECEIVED

JAN 10 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE