



**LONE PINE
CHAMBER OF COMMERCE
& INYO COUNTY FILM COMMISSION**

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Web site, www.lonepinechamber.org ~ e-mail, info@lonepinechamber.org

January 13, 2003

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

Dear Mr. Martin:

The Lone Pine Chamber of Commerce has reviewed the Draft Environmental Impact Report and Environmental Impact Statement prepared for the Lower Owens River Project, dated November 1, 2002 and submits the following comments.

Sincerely,

Bob Meador, DDS, President

RECEIVED

JAN 13 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

**Lone Pine Chamber of Commerce
Comments to the Draft EIR/EIS
Lower Owens River Project
November 1, 2002**

The Lone Pine Chamber of Commerce commends the City of Los Angeles for the great effort restoring water to Mono Lake, keeping Rush Creek Flowing, the re-watering of the Owens Gorge, the work in progress on the dust control of Owens Lake, and the many public works that have been completed under the Long Term Water Agreement. We are confident that the Lower Owens River Project will be accomplished in the near future without legal entanglements.

The Lone Pine Chamber of Commerce is looking forward to the completion of the Re-watering of the Lower Owens River and its off river lakes and pond and the positive impact it will have on the long term economic well-being of Lone Pine. The Chamber will be working cooperatively with the Department to have a sustainable warm water fisheries and recovery of the natural resources within the enhanced habitat of the Lower Owens River.

Recreation and Tourism support the major work force of Inyo County. Re-watering the 62 miles of the Owens River will increase our assets for visitors to enjoy.

- 41-1 | 1. Access requirements at the north end of the project need to allow travel near the riverbed and on a hard surface road. Access should continue on existing or future roads for the total length of the project and exiting on State Route 136. Locked gates and cherry stem roads accessing Highway 395 will add more dust impact and encourage off-road driving to find a passage up/down the river.
- 41-2 | 2. We support the planned Bike Path and this should be included in the final document to allow the bike path to proceed without additional assessment work.
- 41-3 | 3. Viewing areas should be constructed during the re-watering. These selected areas could control the random use of people viewing wildlife and birding.
- 41-4 | 4. Habitat rehabilitation could become the overriding concern in re-watering the Lower Owens River and curtail continued recreational uses in the project. It is important to the Owens Valley Communities that the current recreation opportunities be sustained and enhanced and low impact tourism programs not be opposed due to perceived habitat environmental concerns. The LORP is an investment in the valley's long-term economic well-being. It is recommended prior to taking any mitigation to curtail recreational use, the Department communicate with the Chambers of Commerce of the issue and co-operatively work towards a joint solution.

Prior to 1913 we accepted the environmental conditions caused by the Owens River and we should not expect a greater return or accept less.

- 41-5 | 1. Mosquito infestation is indicated as a negative impact. Allowing 500,000 acre feet of water to pass into the greater Los Angeles area has not created a problem with mosquitoes. It appears with proper monitoring this impact can be controlled.
- 41-6 | 2. Grazing and animal-keeping near the river must be monitored for resource impact, river bank erosion and vegetation destruction.
- 41-7 | 3. Water quality during the early years of re-watering indicated that the river will need some years to recover, the flushing waters in the delta area should prove beneficial to the delta recovery.
- 41-8 | 4. Water loss due to evaporation and bank leakage should be expected and no action be taken to reduce or eliminate.

Proposed pump station size.

- 41-9 | 1. The size of the pump back station can expand to the requested 150 cfs and the amount of water pumped remain at 50 cfs until the court decides on the flow. Given the need of 40,000-50,000 acre feet of water for minimum dust control on Owens Lake mitigation, it would appear the river water flowing into the delta would best serve the City of Los Angeles by directing this effluent to the Dust Control Project.

Specific to the Lower Owens River Project Area.

- 41-10 | 1. Salt Cedar removal should continue and additional volunteer projects should be encouraged.
- 41-11 | 2. Establish a base line for ponds and off-channel lakes prior to re-watering the lower Owens River.
- 41-12 | 3. During the re-watering process monitor and control tule growth and removal.
- 41-13 | 4. The Lone Pine Chamber has reviewed the comments and concerns of the Independence Chamber. Rather than duplicate the comments here, the Lone Pine Chamber has gone on record of expressing the same concerns and requests the Department recognize these comments and concerns are also those of the Lone Pine Chamber.

Funding

- 41-14 | 1. Post implementation costs should not be a burden upon the County of Inyo or citizens of the United States. All mitigation costs shall be funded by the City of Los Angeles from service fees accepted these last many years. These post implementation costs are none other than an on-going operating cost, just as fuel is in the production of electrical generation.
- 41-15 | 2. Monitoring and adaptive management are absolutely essential to the success of the Lower Owens River Project, but the DEIR/EIS repeatedly states that funding limitations may prevent their full implementation. Los Angeles Department of Water and Power should select Funding Option 2 to meet its funding obligations.

Administrative Record.

For purposes of the legal record the Lone Pine Chamber of Commerce references all other public comments and includes them in this document for purposes of establishing the administrative record for this project.

Thank you for the opportunity to comment and express concerns on this one-of-a-kind project.



Los Angeles Area
Chamber of Commerce

VIA FACSIMILE

January 9, 2003

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

Re: Support for Option One of the Lower Owens River Project (LORP)

Dear Mr. Martin:

The Los Angeles Area Chamber of Commerce represents over 1300 members throughout the Southern California area. Our mission is to assure the economic prosperity and quality of life for our members and the community at large. **I am writing in support of Option One of the Lower Owens River Project (LORP) EIR.** The Chamber supports the 150 cubic feet per second pump station option as proposed in the November 2002 Draft Environmental Impact Report.

42-1

The installation of a larger pump as described in Option One, versus the smaller pump in Option Two, provides short term and long term benefits for the region. Use of the larger pump will help facilitate restoration and enhancement of the Lower Owens River ecosystem, will more efficiently deliver water, and will ultimately help the Los Angeles area meet federal requirements regarding decreasing our dependence upon the Colorado River.

In the arid west, it is imperative to efficiently use water resources to balance the needs of the environment with water demands of a growing population. The LORP, as proposed with the 150 cubic feet per second pump station option (Option One), will achieve this balance and provide for a restored ecosystem and will help the Los Angeles area to become less dependent upon the Colorado River as federally mandated.

Sincerely,

Russell J. Hammer
President & CEO

350 S. Ripell St.
Los Angeles, CA 90017

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JAN 13 2003


AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE



Mojave Desert-Mountain Resource Conservation & Development Council

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Donna Thomas, Vice President
Alis Clausen, Secretary
Marie Brashear, Treasurer*

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of Commerce
Lucerne Valley Chamber
of Commerce
Trona Chamber of Commerce*

Others:
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California City Economic
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IWV 2000
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Indian Wells Valley Water District
Kern River Valley
Revitalization, Inc.
Lucerne Valley Economic
Development Association
Mines Exploration, Inc.
Mojave Water Agency
San Bernardino County
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Searles Valley Municipal
Advisory Council
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Contact:
*Jack Wright
MD-M RC&D Coordinator
760-446-1974*

January 13, 2003

Mr. Clarence Martin
Los Angeles Department of Water and Power
300 Mandich Street
Bishop, California 93514
Fax: (760) 873-0266

Dear Mr. Martin,

At an Executive Committee meeting of the Mojave Desert-Mountain Resource Conservation and Development Council held on December 13, 2002 I was authorized to write a letter stating two concerns that some of our Council members have brought to our attention regarding the Draft Environmental Impact Report and Environmental Impact Statement for the Lower Owens River Project in Inyo County, California.

As Chair of the Education Committee for the Mojave Desert-Mountain Resource Conservation and Development Council, I am quite surprised to find that there is no educational component included in your document for the project. There is a great potential and need for developing informational brochures and fact sheets regarding wetland and aquatic habitats, riparian habitats, shorebird habitats and fish, waterfowl and wildlife species that will benefit from the implementation of the project. Perhaps the educational component for the plan could be developed and included as part of the habitat conservation plan. As I understand from reading the Draft EIR/EIS document issued November 1, 2002, the habitat conservation plan will be completed later as a separate document. Is that correct? If not, then I would recommend that an educational component be added as part of the EIR/EIS for the Lower Owens River Project.

A second concern regards the potential increase and spread of saltcedar, an invasive non-native weed, which will occur as a result of the conversion of native upland habitats to wetlands and the releasing of water to the Lower Owens River to enhance native and game fisheries and riparian habitats along 62 miles of the river. Since there is an effort already underway through the Eastern Sierra Weed Management Area to work toward the control and elimination of saltcedar through bio-control and

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43-2

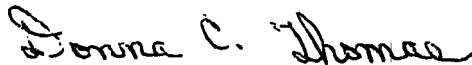
43-3

43-3

other methods, I am sorry that the Draft EIR/EIS does not support such a goal. In fact the document states that there is no funding available through the project to deal with the issue and that funding will need to be found elsewhere. The spread of saltcedar will ultimately affect the water flows as well as degrade the habitats currently in existence and the ones you are seeking to increase and enhance. The land management plan should include practices and alternatives for dealing with invasive non-native species.

Thank you for the opportunity to comment.

Sincerely,



Donna C. Thomas, Vice-President
Mojave Desert-Mountain Resource Conservation and Development Council



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Clarence Martin
LADWP
300 Mandich St.
Bishop, CA 93514

VIA FAX 873-0266

January 14, 2003

RE: Lower Owens River Project DEIR/DEIS

Dear Mr. Martin:

The Mono Lake Committee offers the following comments on the Lower Owens River Project Draft Environmental Impact Report and Statement (DEIR). Our comments focus on the Monitoring and Adaptive Management aspects of the LORP restoration program, which have parallels with the restoration program underway in the Mono Basin. We understand there is significant debate over the size of the pumpback station, and our comments apply to whichever size station is deployed.

44-1

The Committee was a key party in the efforts that led to a State Water Board-approved restoration plan for the Mono Basin. This plan relied primarily on reestablishing natural processes – in particular, "natural" flows in the streams – to restore stream dynamics and function and restore riparian forests. At present, the restoration plan implementation is in its fifth year, though partial restoration began nearly two decades ago with court-ordered minimum flows in the streams. A key component of the Mono Basin restoration plan is the detailed annual monitoring, which helps measure progress towards restoration goals and provides data for adaptive management actions. While the Mono Basin restoration program has had its challenges, it is widely viewed as a highly successful, model program.

The LORP hold the potential for wonderful habitat benefits. In particular, riparian and wetland habitats of the Lower Owens River historically have been extremely valuable for migrant and breeding songbirds, shorebirds and waterfowl. The Committee commends all the parties for the work that has gone into developing the LORP.

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boxed JAN 14 2003

WJEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

MONITORING PROGRAM (including adaptive management)

A strong monitoring program linked to adaptive management is critical to the success of a restoration program on the scale of that proposed by LORP.

Project timeline

44-2 Ecosystem Sciences expects that intensive monitoring and implementation of adaptive management measures will only be necessary during the initial 15 years after implementation of the project. Based on our experience in the Mono Basin, this timeline likely is too short. First, should implementation not proceed as originally scheduled in the project plan, the timeline for habitat response may be prolonged. We have experienced this in the Mono Basin where certain planned restoration actions fell behind their originally proposed schedules for completion, delaying actual restoration on the streams. Second, it may take more than 15 years to assess the success of restoring the riparian forest along the stream since forests take many years to grow to maturity.

The Committee suggests that, rather than terminating the monitoring program in 15 years, the parties establish a review point at that time to assess progress and determine whether further monitoring is in order, based on restoration progress. Such a review point was included in the Mono Basin restoration plan.

Project funding

If Funding Option One is selected, LORP may not achieve its goals and may actually generate problems. As Tables 2-19, 21, 23, and 25 indicate, there are numerous potential future actions which may not occur, despite their importance to the overall health of the system, including tule and beaver dam removal and salt cedar eradication. Of particular concern is the threat of the spread of exotic plants, particularly salt cedar (considered a Class I impact in the DEIR), throughout the LORP system.

44-3 While the overall Owens Valley exotics problem is not the responsibility of LORP, the LORP should contribute responsibly to efforts to limit the spread of these plants, which threaten to undermine the overall restoration goals of the project. Therefore, the Committee strongly recommends adoption of Funding Option Two. This option may be made less onerous by taking advantage of community volunteers and visiting work teams, something the Mono Lake Committee has relied on in the Mono Basin, and by seeking watershed funding, which currently is available at the state level.

Adaptive management: goals, criteria, and monitoring/reporting protocol

As stated in the LORP DEIR, "a decision to implement adaptive management measures

will be predicated upon established objectives and decision criteria." Project objectives and decision criteria appear to be only generally defined in the document, and there is little reference to baseline data. Monitoring protocol, if such protocol exists, is not referenced. This lack of definition and precision may leave the LORP open to subjective and possibly inconsistent decisions as restoration proceeds. For example, in Table 2-19, decision criteria (or monitoring triggers) are vague, e.g., "A determination that the habitat goals are not being achieved will be based upon monitoring data that show that habitats are not achieving desired trend in habitat characteristics and recruitment that are important to the 'habitat indicator species,'...." What specific habitat characteristics are desired? What characterizes the desired trend and how will this be measured? Does baseline data exist against which trends will be measured? Also: "Growth of exotic plant species is hindering achievement of habitat goals." What will be measured to determine whether habitat goals are being hindered by exotics?

44-4

Based on its experience in the Mono Basin, the Committee recognizes the challenge of defining clear goals and criteria for a natural system undergoing recovery. There are many unknowns. What changes will occur in the system as it undergoes restoration? What will the system actually look like in 20 years, after the first phases of restoration? Still, it is important to define criteria as clearly as possible up front; these then offer guidelines for future adaptive management actions. As we have found in the Mono Basin, sometimes even the initial criteria need to be modified once more is learned about the restoring system. But having defined goals and criteria at the start offers a practical framework within which to work and helps limit future disagreements among interested parties.

It is possible that, with all the work that has been undertaken already in preparation for the LORP, clearly defined baselines, goals, monitoring triggers, and monitoring/reporting protocol may exist either with LADWP, Inyo County Water Department or Ecosystems Sciences. If so, this information should be included in or referenced by the DEIR. If not, this information needs to be developed prior to the start of program implementation.

Annual reporting, technical group

The proposal to prepare annual reports on restoration progress is good, as is the proposal for the Technical Group to review results and propose management changes as needed on an annual basis. This proposal mirrors the procedure followed by the LADWP in the Mono Basin. It will be important for the Technical Group to take their oversight role seriously and for the annual reports and Technical Group meetings to be well publicized so that the interested public can learn more and offer valuable comment.

44-5

Habitat mapping

44-6

The LORP proposes to use as the basis of its habitat monitoring the remote imagery periodically obtained by LADWP for its lands in the Owens Valley. It makes financial sense to take advantage of this information that is already being gathered by LADWP. However, to be truly useful, the timing of this remote imaging should coincide with timing that is most relevant to the purposes of this project and should be consistent throughout the years. For example, it appears that remote imagery will be used as the basis for a monitoring trigger to determine adjustments to baseflow (see 2.3.2.2). It will be important that remote imagery used for this purpose be conducted at the same time each year to maintain consistency in results. The Committee does not know when it would be most useful to document the Lower Owens River habitats – presumably sometime in the summer – but whatever the ideal timing is, as determined by scientists, LADWP should conduct its remote imagery consistently at that time.

DELTA HABITAT AREA

44-7

The brine pool area is used by numerous waterfowl and shorebirds. It comprises an important element of the Owens Lake “Important Bird Area,” designated by the National Audubon Society to be of significant national importance. The area also is included in the U.S. Shorebird Conservation Plan. It appears that in the DEIR there are conflicting reports on what the impacts will be to the delta area (including the brine pool below), though it is likely that there will be a Class I impacts to the brine pool transition area.

Whichever final alternative is selected, it will be important to preserve essential brine pool transition area habitat features to benefit waterfowl and shorebirds. The DEIR suggests that adjusting delta baseflows may help reduce habitat loss in this area. Perhaps adjustments in pulse flows could help. Given the importance of this area to shorebirds and waterfowl, it will be important that the monitoring program track changes in the brine pool transition area and provide data to be used as the basis for recommending changes (if needed) to whatever regimes are initially instituted to maintain this valuable habitat.

RIPARIAN RESTORATION

Timing of seasonal flows

44-8

The DEIR does not indicate how the timing of seasonal flows will be determined, though it suggests late May or early June as the projected time. It is our understanding from

44-8

discussions with LADWP staff that the timing of the seasonal flows will be determined each year based on a field assessment of the projected timing of the cottonwood and willow seeds, something that varies from year to year. This would be an excellent approach – particularly if it could involve the Technical Group in the decision-making – and should be specifically mentioned in the DEIR. Timing the seasonal flows to coincide with the natural seed dispersal period is critical to effective seedling recruitment.

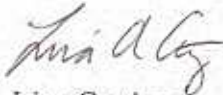
RECREATION MANAGEMENT

44-9

If LORP is successful, there should be new and improved recreational opportunities. This will likely engender new uses and human impacts along the entire system. It is likely that a recreational management plan will need to be developed to help manage human impacts. While this falls outside the scope of this project, all parties should recognize that ultimately such a plan will need to be developed in order to safeguard habitat values restored by LORP. The Committee urges LADWP to commit to working with the team of people that will be necessary to successfully develop and implement such a plan.

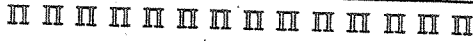
Thank you for the opportunity to comment.

Sincerely,



Lisa Cutting
Eastern Sierra Policy Director

MOSS GROUP



January 3, 2003

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

Dear Mr. Martin:

We applaud the Los Angeles Department of Water and Power (LADWP) for taking the necessary steps to restore the Lower Owens River by returning a steady flow of water from the Los Angeles Aqueduct to the Owens River as well as spreading additional water into basins to create wetlands habitat.

As delineated in the November 2002 draft Environmental Impact Report, the Lower Owens River Project (LORP) restoration approaches are scientifically sound, and will significantly enhance and restore the river's ecosystem.

However, one issue that remains outstanding is the size of the pump-back station. We strongly support the 150 cubic-feet-per-second pump station as proposed by the LADWP in the draft EIR.

45-1

Inyo County and the Environmental Protection Agency advocate installing a smaller (50 cfs) pump station, Option 2 in the EIR. This option would allow higher seasonal habitat flows to flow past the pump station to the Owens Lake Delta and beyond. However, scientific evidence presented in the EIR shows that most of the higher habitat flows would quickly pass through the Delta and end up in the brine pool in the middle of Owens Lake, providing little benefit to the project or public.

A larger pump station (150 cfs), described as Option 1, which is preferred by the LADWP, would capture excess flows before they pass to the brine pool and deliver the water onto Owens Lake for dust mitigation, or to Los Angeles for much-needed public use. LADWP has identified its first priority for this excess water as the dust control project, with flows above capacity to be diverted to the Los Angeles Aqueduct. Scientific evidence shows that the Delta habitats will flourish through conservative water allocations and advanced water management techniques. The proposal provides water to the Delta during key periods for wetland needs and wildlife. The 150 cfs pump station would simply recover water that is not necessary to achieve environmental goals in the LORP Delta habitat area.

In the arid west, we must realize the necessity of wisely using water resources to balance the needs of the environment with water demands of a growing population. The LORP, as proposed with the 150 cfs pump station option, will achieve this balance and provide for a restored ecosystem that will offer tremendous recreational opportunities to the general public, while continuing to maintain a reliable water supply to Los Angeles residents and businesses.

Sincerely,

Richard F. Moss

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JAN / 7 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

January 13, 2003
Mr. Raul Montenegro
Account Manager
Los Angeles Department of Water and Power
111 North Hope Street, Room 1009
Los Angeles, California 90012

Dear Mr. Montenegro,

46-1 As the Golf Course Superintendent at MountainGate Country Club I support the LADWP for taking the correct measures needed to restore the Lower Owens River by diverting water from the L.A. Aqueduct to the Owens River and wet lands. As stated in the November 2002 Environmental Impact Report draft this project will enhance and restore the wet lands and river.

However, after reviewing this proposal I feel that the 50-CFS pump station is under sized. A larger pump station (150-CFS) would help Los Angeles meet its water requirements. Any excessive water flow will be diverted to the L.A. Aqueduct to help the Owens River and wet lands.

Sincerely,



David Bermudez
Golf Course Superintendent
MountainGate Country Club

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AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

PARK ● BRE A
APARTMENTS

LANDMARK TOWERS / PREMIER TOWNHOME APARTMENTS
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January 10, 2003

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

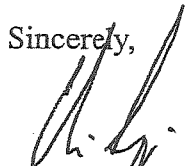
Dear Mr. Martin:

47-1

This letter is written to support the position of the Los Angeles Department of Water and Power (LADWP) on the Lower Owens River Project (LORP). I commend the LADWP for undertaking such an expansive project to restore the river and create wetlands habitat. The LORP is among the most significant river habitat restorations ever undertaken in the United States.

I support LADWP's proposed Option 1 in their Section 6.5.3. which will allow installation of a 150 cfs pump station. LADWP has identified its first priority for this excess water as the dust control project, with flows above capacity to be diverted to the Los Angeles Aqueduct. I feel the LORP as proposed with the 150 cfs pump station option will wisely use our water resources to balance the needs of the environment with the water demands of a growing population.

Sincerely,



Chris Scroggin
General Manager
Park Labrea Management

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JAN 13 2003

AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

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January 13, 2003

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

RE: Public Comments on LORP EIR

Dear Mr. Martin:

Pestmaster Services would like to provide public comments on the draft Lower Owens River Project Environmental Impact Report.

We wish to address two specific issues which are addressed throughout the entire document

1. Mosquito Issues

The LORP document states that the rewatering will cause mosquitoes and there is no feasible mitigation measure for this impact (page S-5, item 7 and others)

48-1

In fact, the concept of mosquito mitigation is very feasible and many effective alternatives exist. As a contractor dealing with mosquito issues nationwide, we feel that a mosquito program, either preventative at the larval stage or as necessary during adult activity, is affordable and is in the best interest of the health of the citizens of the Owens Valley. While the EIR mentions on page S-14 that LADWP would coordinate with the Owens Valley Mosquito Abatement Program, an alternative is to request additional funding and have that item competed on a public basis. The treatment would be as effective and via public competition, the service would be done by a cost conscious private contractor.

We strongly recommend that mitigation measures be included into the final document for mosquito abatement and the recommendation be made for public competition of these mitigation measures.

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AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE



2. Salt Cedar/Tamarisk Issues

Also throughout the LORP document, it states that the rewatering would and could create additional areas for the colonization of saltcedar. (Page S-5, Item 4 and others). Further in those items, it states that there is no feasible mitigation measure to avoid this impact due to funding limitations.

Yet further, on Page 2-29, it states that LADWP will rely solely on Inyo County's removal program.

The proliferation of tamarisk is a direct threat to the active water supply in the Owen's Valley. Many watersheds across the country have been virtually eliminated by the aggressive growth of tamarisk. One such case was regarding the Pecos River. Tamarisk was allowed to grow along the Pecos until there was but a trickle passing over the border from New Mexico to Texas. The result was a lawsuit filed by the State of Texas against the State of New Mexico. Do we want this to happen in the Owen's Valley?

48-2

A mature tamarisk tree can not only consume up to 300 gallons of water per day, it also deposits a highly saline material on the ground which prevents any native vegetation from growing in the area – in effect, it creates it's own monoculture. So tamarisk not only threatens the water supply in our valley, it would threaten any native vegetation.

In the overall long range planning for water resources in the Owens Valley, the potential damage and significant water usage of any tamarisk allowed to grow cannot be ignored solely because the mitigation of this 'botanical barbarian' has been determined by LADWP to only be contingent on outside funding and grants.

Tamarisk control, as well as other noxious and exotic species noted in the EIR such as pepperweed and knapweed must be a key aspect of any water management plan. Funds must be prioritized and dedicated to a weed management program. While the EIR discusses use of the internal resources of DWP or use of the Ag Commissioner's program, the scope of a weed management program such as this could be effectively put into place by a private sector firm. Ours, for example, has provided effective control measures for many governmental agencies across California against species such as these. We know that the budgets put into place for these programs have been effective and the overall result has been significantly reduced water consumption by the target weed species.

Clarence Martin
LORP EIR Public Comments
Page 3

48-2

We again strongly recommend that the importance of tamarisk and other invasive weed species be elevated due to the effects that will come, and they will if the species are left untreated. Left untreated, or if a minimal effort is used in the management, future water issues will be adversely impacted. This has been documented many times throuout the South and Southwest part of the country – in similar situations such as was referenced above on the Pecos River. Funding for these programs should be an integral part of *any* Owens Valley Water Management Program.

Thank you for the opportunity to provide comments. Should additional data be required of our firm, it would be our pleasure to submit additional technical documents or have staff meet with you or others regarding this project.

Sincerely,

Ted Erlwein

Ted Erlwein

WINTER PHONE: (760) 872-8331

Serving Inyo & Sierra National Forests



SUMMER PHONE (760) 935-4493

ROCK CREEK PACK STATION

P. O. BOX 248
BISHOP, CALIFORNIA 93515

January 14, 2003

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

FAX: 873-0266

Dear Mr. Martin,

These are my comments on the Lower Owens River Project EIR and EIS:

- 49-1 1. The document fails to establish baseline resource conditions throughout much of the area that will be affected by restoring water flow to the Owens River. Throughout the document the writers of the plan state that the proposed action will improve the environment, range, fishery, habitat, etc. The EIR lacks adequate description of the condition of the grasslands, saltcedar distribution, and impacts on the land from current recreational use.
- 49-2 2. The EIR/EIS does not adequately assess the impact the project will have on the local economy. It ignores the impact to ranchers and the packing industry. The socioeconomic analysis is inadequate.
- 49-3 3. The Department of Water and Power and others promoting the Lower Owens River Project claim there will be significant opportunities for recreation. The document fails to describe what environmental effects will occur do to the increased amount of traffic. You project significant increase in visitors from the Owens Lake to north of Independence. This EIR/EIS is extremely flawed without considering the effects of recreation on the environment.
- 49-4 4. The City of Los Angeles should consider the pump back station at a capacity of 150 cfs. There are significant benefits to allowing greater flows of water to go through the Lower Owens River and then be brought back to the aqueduct. Re-watering the Owens River will be an experiment. By allowing a pump back station to be increased in size it will allow greater flows of water to be put into the old river bed. And, in the heavy snowpack years, maybe there will be a benefit to allowing more water to move through the Lower Owens River.

An increased pump back station doesn't give the City the right to export more water. Rather, it allows greater flexibility for uses of water throughout the entire Owens

Valley. The EIR/EIS does a poor job of illustrating the benefits of increased pump back capacity.

- 49-5 5. Rather than prescribe range management tools such as forced rest /rotation and utilization standards; the plan should permit flexible management that will emphasize looking at long term trends to dictate how the land is grazed. Modern grazing techniques of more cross fencing and allowing higher utilization during certain times of the growing season may improve the range. Take advantage of good modern range scientists.
- 49-6 6. The EIR/EIS promotes the use of cattle guards. Cattle guards without gaits that allow equines to get caught in the guards should not be allowed. Any cattle guards used in the future should be "equine safe".
- 49-7 7. The EIR/EIS indicates beaver will be trapped. Beavers should not be transported to areas in the Sierra where they will increase in numbers and cause problems with water quality.
- 49-8 8. The saltcedar problem will be far worse than the EIR/EIS is predicting. More water will be needed in the river. And, the increased saltcedar forests will deplete groundwater and affect the habitat already existing. The EIS is inadequate in addressing the impacts. Before proceeding forward with the project someone needs to figure out a way to solve the problem. And, who is going to pay to solve the saltcedar problem?

Mr. Martin, in my opinion, adaptive management will be the best way to address impacts that occur as the City puts more water back into the Owens River bed. This is a bold initiative and the land managers will need as much flexibility as possible in dealing with future challenges. However, before moving forward with the project...the environmental analysis should be properly completed.

Sincerely,



Craig London, D.V.M.

Vice President, Rock Creek Pack Station

January 10, 2003

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

Dear Mr. Martin:

Planning

The University of Southern California is pleased to support the Los Angeles Department of Water and Power (LADWP) project to restore the Lower Owens River. This restoration is made possible by returning a steady flow of water from the Los Angeles Aqueduct to the Owens River as well as spreading additional water into basins to create wetlands habitat.

The November 2002 draft Environmental Impact Report (EIR) states that the Lower Owens River Project (LORP) restoration approaches are scientifically sound, and will significantly enhance and restore the river's ecosystem. There is one outstanding issue and that is whether the size of the pump-back station should be a 150 cubic-feet-per-second (Option 1 in the draft EIR) or a smaller 50 cubic-feet-per-second station (Option 2 in the draft EIR).

USC strongly supports Option 1, the 150 cubic-feet-per-second pump station, as proposed by the LADWP.

We understand that Inyo County and the Environmental Protection Agency advocate installing a smaller (50 cfs) pump station. This option would allow higher seasonal habitat flows to flow past the pump station to the Owens Lake Delta and beyond. However, scientific evidence presented in the EIR shows that most of the higher habitat flows would quickly pass through the Delta and end up in the brine pool in the middle of Owens Lake, providing little benefit to the project or public.

A larger pump station (150 cfs), described as Option 1, would capture excess flows before they pass to the brine pool and deliver the water onto Owens Lake for dust mitigation, or to Los Angeles for much-needed public use. LADWP has identified its first priority for this excess water as the dust control project, with flows above capacity to be diverted to the Los Angeles Aqueduct. Scientific evidence shows that the Delta habitats will flourish through conservative water allocations and advanced water management techniques. The proposal provides water to the Delta during key periods for wetland needs and wildlife. The 150 cfs pump station would simply recover water that is not necessary to achieve environmental goals in the LORP Delta habitat area.

Wisely using water resources to balance the needs of the environment with water demands of a growing population is Los Angeles' greatest challenge. The Lower Owens River Project, as proposed with the 150 cfs pump station option, will achieve this balance and provide for a restored ecosystem that will offer tremendous recreational opportunities to the general public, while continuing to maintain a reliable water supply to Los Angeles residents and businesses.

Sincerely,



Bingham C. Cherrie
Associate Vice President

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AQUEDUCT MANAGER
BISHOP ADMINISTRATIVE OFFICE

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