



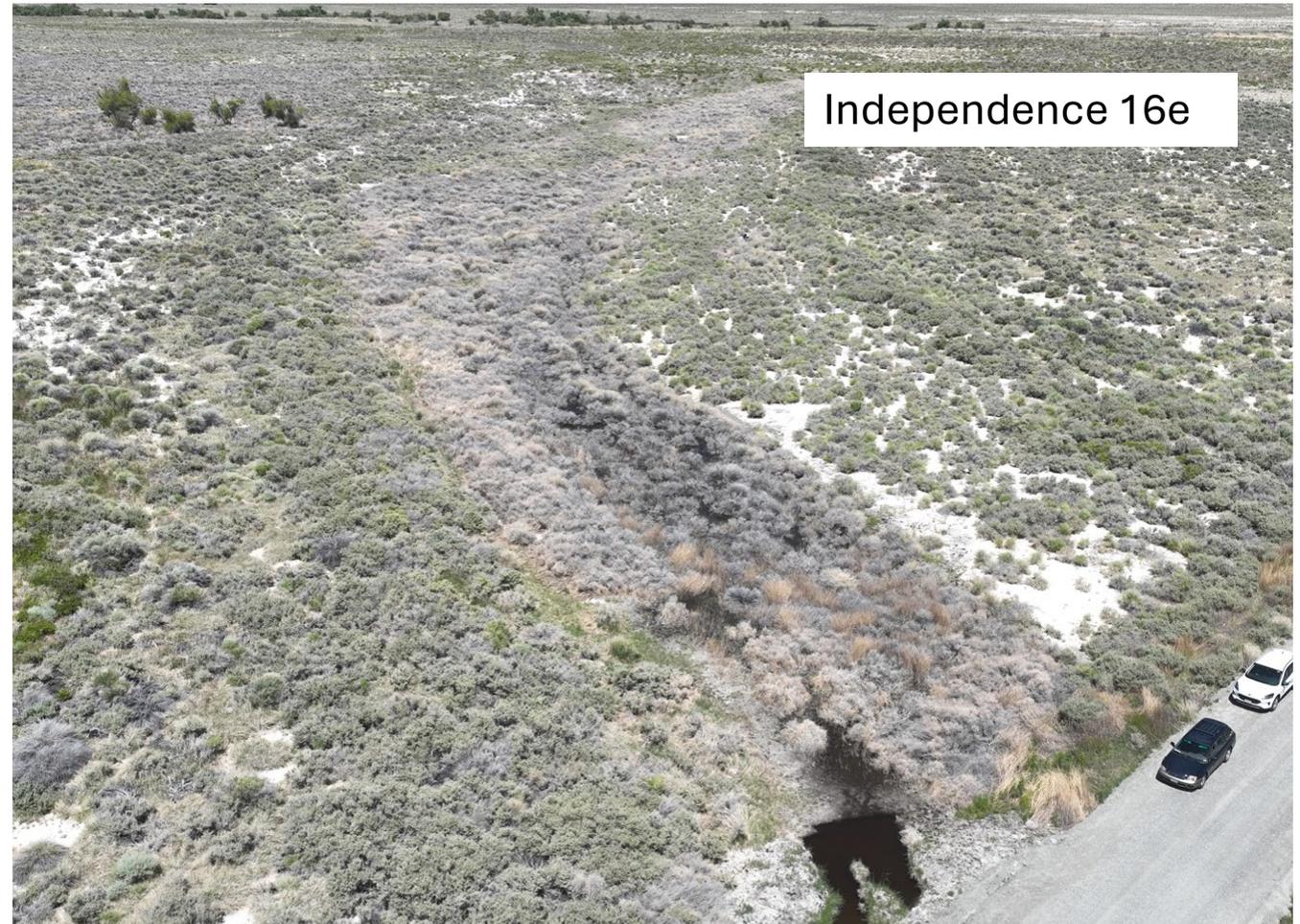
2024-2025 MITIGATION REPORT

Under the Long-Term Water Agreement and related subsequent agreements, the Los Angeles Department of Water and Power (LADWP) is obligated to implement 64 mitigation projects in the Owens Valley to address environmental impacts from the abandonment of irrigated agriculture and the effects of groundwater pumping. A central responsibility of the Inyo County Water Department (ICWD) is to monitor these projects and report on their status. The scope of the projects varies widely, from the maintenance of single-acre springs to the management of the 78,000-acre Lower Owens River Project (LORP).

Update on MOU Party Initiated Mitigation Review Process

Over the past year, the MOU parties have continued to meet in response to the Sierra Club (SC) and Owens Valley Committee's (OVC) 2023 request. While this ongoing dialogue is a positive step, follow-up actions have been lacking and/or steps toward accountability have not been established.

For instance, at Blackrock 16E, discussions about how to manage the site remain unresolved. LADWP has not produced a plan for a vegetation management experiment that had been discussed. Early ideas included removing the dead shrub overstory to promote grasses, but no action plan has been outlined and no action taken at the site. If shrub removal proceeds, seasonal irrigation from the Hines Springs Well 355 let into the project area could sustain meadow vegetation, establish a riparian corridor along the conveyance, and limit future expansion of shrubs at the site.



Aerial view of Blackrock 16E looking northeast. The gray strip of dead encroaching shrubs occupies an area previously documented as meadow (May 23, 2024).

The Five Bridges site has become the new focus of discussion. In the mid-1980s, pumping from two nearby wells decimated roughly 300 acres of riparian and other vegetation. Although about 240 acres have shown some recovery, the remaining 60 acres remain largely barren, and the entire area is now dominated by invasive white-top (*Lepidium latifolium*). Decades of treatments including herbicide applications, mowing, disking, and overplanting have failed to control the weed over time, and both the weeds and the treatment efforts to control them have kept a native riparian community from returning. A working group of MOU party members has heard from the weed control experts, who have worked a decade or more in the project area, that their efforts have had little effect on eradicating the weed. The MOU party working group is now exploring whether changes in irrigation might help, though acknowledging that *Lepidium* often responds more aggressively to added water than native plants.

LADWP and the parties all but conceded that full recovery of riparian vegetation may no longer be feasible due to weeds and hydrologic changes that reduced river flow and permanently altered the hydrogeology.

One approach to resolve the failing project could involve a continuation of weed treatments combined with a program of tree planting along irrigation ditches within the project site.

If the riparian development goals of the Five Bridges project cannot be obtained then then alternative mitigation at another site, such as Hines Springs, should be considered.



Holly Alpert wading through *Lepidium* near the area that's surveyed to determine project status (August 9, 2025).

Another matter still pending is the Laws Type-E Transfer MND project intended to restore 253 acres of native vegetation on abandoned and unirrigated cropland parcels. LADWP has established a crop of native vegetation using underground drip irrigation in these fields but unexpectedly ceased irrigation in 2022. They reasoned that, having measured vegetation cover and species composition, vegetation goals had been met and water withdrawn, beginning a test period to assess sustainability. The County raised concerns around groundwater-dependent species being planted (that were not on the approved species list) and about the survivability of these species without continued irrigation. To rectify these concerns and assure the success of this project, the Water Department and LADWP have collaborated on preparing an amendment to the CEQA mitigation and monitoring plan. As part of this process, the County has identified several discrepancies in how data have been collected in both the revegetation parcels and their reference sites. New methods are expected to produce more reliable and comparable data across sites and years. The updated plan is expected to set stricter requirements for data collection, longer evaluation periods, and clearer benchmarks for success.



Field staff discussing the location of a transect to be run at one of the Laws Type-E Transfer parcels. (June 10, 2025)

Sustainability of Revegetation Efforts

The ambiguity surrounding criteria for determining project completion remains unresolved. Under the 1999 Revegetation Plan, developed pursuant to the 1997 MOU, a key measure of success is whether revegetation efforts are sustainable. However, the plan provides little guidance on how sustainability should be assessed. LADWP had proposed an outline as to a method that might be used to measure sustainability, but no plan has been produced.

Despite not having the tools to assess sustainability, LADWP has assessed that four projects (Independence 105 and 123, Blackrock 16e, and Laws 140) have met vegetation cover and species richness goals based on measurements and observations and therefore require no further intervention. However, the question is whether these parcels only need to meet the goals once to be considered complete, or whether they should be assessed over time. Furthermore, the sustainability aspect of the revegetation goal has not been assessed. Without a clear, defensible method for measuring sustainability, any declaration of project completion is premature.



Photomosaic of Independence 123 (October 2, 2024)

Update on Homestead Additional Mitigation Project

This project, one of eight Additional Mitigation initiatives, was in part intended to create an approximately one-acre pond. While a pond initially formed when water was first supplied, subsequent shifts in water patterns and a rising water table have led to the establishment of emergent vegetation, replacing the pond with cattails and bulrush.

Although the County and LADWP began discussions last year on how to address the loss of the water feature, which is a key component of the mitigation project, those discussions have stalled, and no progress has been made toward identifying or implementing a solution. To date, no action has been taken, and the project remains incomplete.

Options that were suggested by the Water Department include excavating a new pond on-site, away from the riparian vegetation that has developed, or relocating the pond to a different site altogether outside the Homestead area. Both alternatives would require significant work and may trigger CEQA review.



*Aerial view of the project area looking east, showing the former pond area, now overtaken by cattail and bulrush.
(December 11, 2024)*

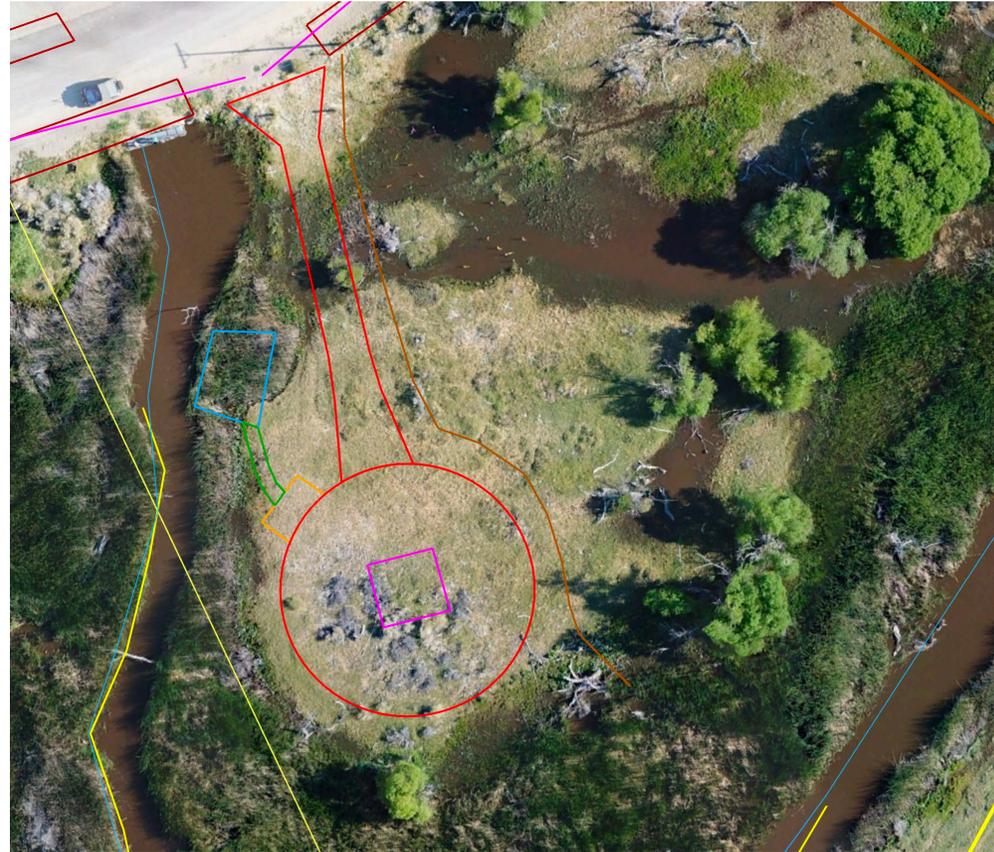
Owens River Water Trail Update

The Owens River Water Trail, a component of the Lower Owens River Project Recreational Use Plan, has been under development for about a decade. Progress has been slowed by delays in finalizing lease agreements between the County and LADWP.

Originally, the County secured \$610,000 in grant funding for project design and implementation, but the inability to reach a lease agreement had jeopardized those funds. A key grant—a \$110,000 pledge by the California Department of Boating and Waterways--has already been lost due to delays.

In last year's report, it was noted that remaining funds had to be expended by March 2026. Since then, the California Department of Natural Resources has extended the deadline by one year, giving the County until March 2027 to finish the project. With this extension in hand, the Water Department has hired an engineering firm to prepare designs for the project's launch and take-out facilities. Plans include a road with turnaround access, parking, a building with changing rooms and restrooms, a staging area for unloading boats, signage in a shade structure, a graded path leading to the river, and a structure to assist with getting boats on and off the water. These improvements are intended to provide safe, durable, and accessible infrastructure for public use.

Meanwhile, in the community of Lone Pine, a group of residents has come together to outline the formation of a river stewardship group. This group hopes to support the Water Trail by fostering community involvement, volunteer stewardship, and local advocacy for the project.

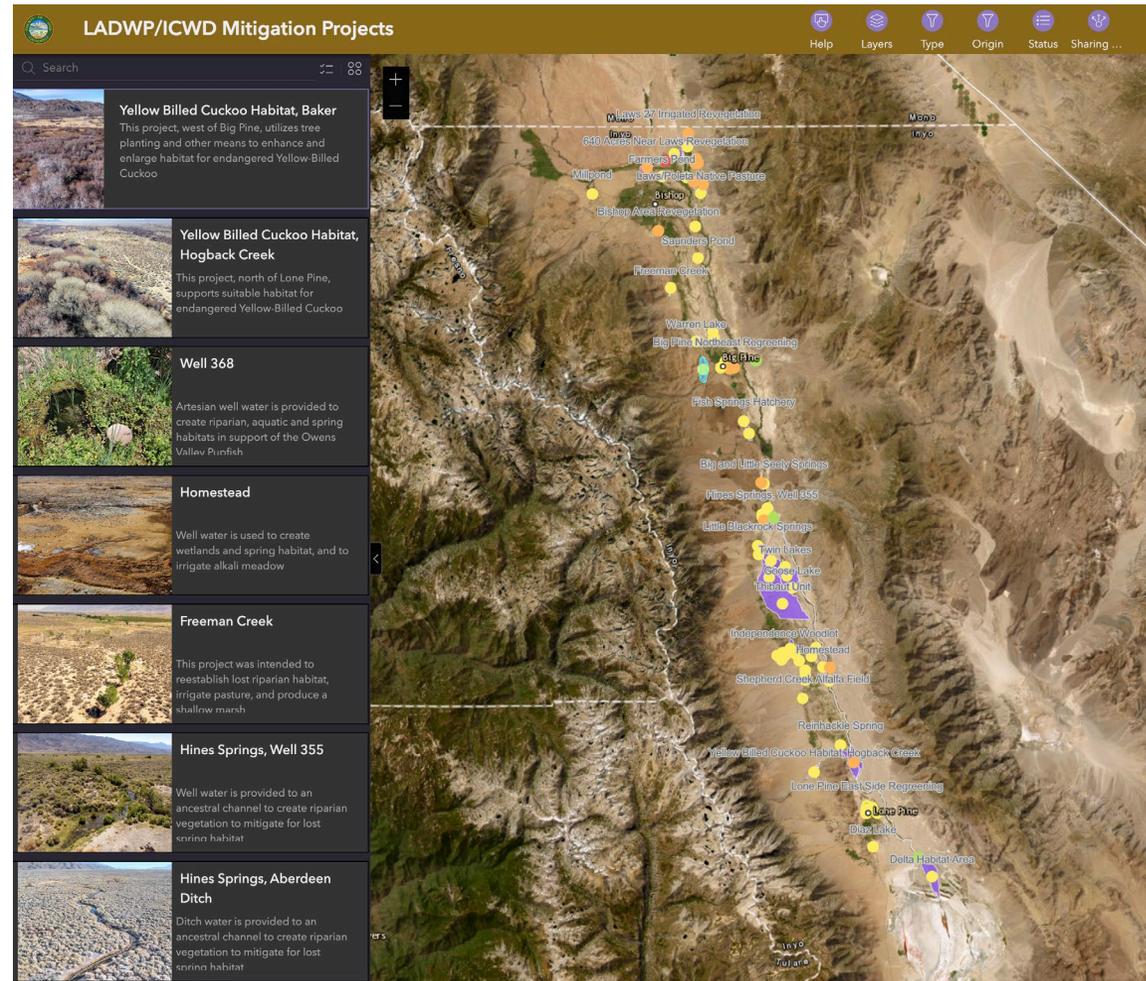


Conceptual layout of the Owens River Water Trail launch: red indicates the access road and turnaround off Lone Pine Narrow Gauge Road; magenta marks the changing facilities and restroom; orange shows the staging pad and signage; brown denotes fencing and parking; green represents the path to the river; and blue identifies the water entry point. Other lines depict project boundaries and channel conditions.

Mitigation Map

The online interactive mitigation map, which contains information about mitigation projects, including their locations, has been updated. The maps can be accessed through the Water Department's website under Quick Links.

The map offers a comprehensive overview of all mitigation obligations in the Owens Valley related to the Long-Term Water Agreement, associated Stipulations and Orders, and subsequent initiatives. It serves as a valuable complement to the status table, providing users with detailed project site photos, a search function, and customizable filters. These filters allow users to locate projects based on specific criteria such as project goals, legal origin, status, and water delivery, making the map an essential tool for both newcomers and experienced users alike.



Mitigation Map layout.

Mitigation Status Table

In addition to the interactive Mitigation Map, the Water Department maintains a comprehensive Mitigation Table that tracks all LADWP commitments arising from the 1991 EIR, the 1997 MOU, and subsequent agreements. This table consolidates more than three decades of mitigation obligations into a single reference document. Each project is listed with its origin, scope, and current status, allowing users to quickly assess whether the project has been completed, is being implemented as required, or is implemented and ongoing.

The table also identifies projects that are fully implemented but not meeting prescribed goals, as well as those that are under review or development. Notes are included where Inyo County and LADWP differ in their assessments. The table is a valuable tool for highlighting areas of disagreement and guiding future discussions among the MOU parties. It serves several functions: it improves accountability by documenting the status of each obligation, preserves historical context by linking projects to their legal origins, and helps prioritize future work by identifying projects that continue to fall short. It serves as a reference for decisionmakers, stakeholders, and the public, keeping all parties apprised of where obligations have been met and where work remains.

The following three pages contain the 2024-25 updated table. It can also be found on the ICWD website: <https://www.inyowater.org/projects/mitigation/>.

Project Origin	1997 MOU	LADWP MITIGATION PROJECT COMMITMENTS	Completed	Implemented as Required ²	Implemented and Ongoing ³	Fully Implemented
	X	Freeman Creek Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X ⁷	
	X	Hines Spring (1 to 2 acres, EIR Impact 10-14), implemented as the Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3)			X	
	X	Hines Spring South (EIR Impact 10-11)			X	
	X	Hines Spring Well 355 Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X	
	X	Homestead Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X ⁷	
	X	Independence 105 (EIR Impact 10-13)	LA			
	X	Independence 123 (EIR Impact 10-13)	LA			
	X	Independence 131 (EIR Impact 10-13)			X	
	X	Independence Ditch System (EIR Table 4-3)			X	
	X	Independence East Side Regreening Project (23 acres; EIR Impact 10-11, EIR Table 5-3)			X	
	X	Independence Pasturelands and Native Pasturelands (610 acres; EIR Impact 12-1, EIR Tables 4-3 and 5-3)			X	
	X	Independence Roadside Rest Area (0.5 acres; EIR Tables 4-3 and 5-3)			X	
	X	Independence Springfield (286 acres; EIR Impact 12-1, EIR Tables 4-3 and 5-3)			X	
	X	Independence Woodlot (20 acres; EIR Impact 10-11, EIR Table 4-3)			X	
	X	Klondike Lake Aquatic Habitat (160 acres; EIR Impact 10-5 and 11-1, EIR Tables 4-3, 5-2, and 5-3)			X	
	X	Klondike SSHA (Big Pine Ditch System MND)			X ⁷	
	X	LAWS 118 (<u>19 acre</u> portion) (Laws Type E Transfer MND)				
	X	LAWS 129 (Laws Type E Transfer MND)				
	X	LAWS 27 (Native Seed Farm) (Laws Type E Transfer MND)				
	X	LAWS 90 (Laws Type E Transfer MND)				
	X	LAWS 94 (Laws Type E Transfer MND)				
	X	LAWS 95 (Laws Type E Transfer MND)				
	X	Laws Area Revegetation Project (140 acres; EIR Impact 10-18)	LA			
	X	Laws Historical Museum Pasturelands (21+15 acres; EIR Impact 10-18, EIR Table 5-3)			X	
	X	Laws/Poleta Native Pasture (216 acres; EIR Impact 10-16, EIR Tables 4-3 and 5-3)			X	
		Little Blackrock Springs (EIR Impact 10-14, EIR Table 5-2)			X	
	X	Lone Pine East Side Regreening (11 acres; EIR Impact 10-16, EIR Table 5-3)			X	
	X	Lone Pine-North Lone Pine Clean Up (EIR Table 4-3)	X			
		Lone Pine Riparian Park (320 acres, EIR Tables 4-3 and 5-3)			X	
		Lone Pine Sports Complex (EIR Table 5-3)	X			
		Lone Pine West Side Regreening (8 acres; EIR Impact 10-16, EIR Tables 4-3 and 5-3)			X	
		Lone Pine Woodlot (12 acres; EIR Impact 10-11, EIR Table 4-3)			X	

Inyo and LADWP Mitigation Table, with Project Origin and Status

1991 EIR Mitigation	1991 EIR Environmental Projects	1991 EIR E/M Project	Revised Project	1997 MOU	LADWP MITIGATION PROJECT COMMITMENTS	Completed	Implemented as Required ²	Implemented and Ongoing ³	Fully Implemented Not Met Goals ⁴	Not Fully Implemented ⁵
				X	Aberdeen Ditch Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X		
X	X				Big and Little Seely Springs (1 acre pond near Well W349; EIR Impact 10-14, EIR Table 5-2)			X		
X			X		Big Pine Area Revegetation Project (160 acres; EIR Impact 10-19)				X	
X			X		Big Pine Area Revegetation Project (20 acres; EIR Impact 10-19)				X	
X					Big Pine Ditch System (EIR Impact 10-19)			X		
X		X	X		Big Pine Northeast Regreening (30 acres; EIR Impact 10-11, EIR Table 5-3)			X		
X			X		Bishop Area Revegetation Project (124 acres; EIR Impact 10-16)			X	IC ⁷	
X			X		Blackrock 16E Revegetation Project (EIR Impact 10-11)	LA ⁷			IC ⁷	
X	X				Blackrock Hatchery (EIR Impact 10-14)			X		
X	X				Buckley Ponds (EIR Impact 10-5 and 11-1, EIR Table 5-2)			X		
X	X				Calvert Slough (EIR Impact 10-5, EIR Table 5-2)			X		
X					Olancha-Cartago Irrigated Fields			X		
X	X			X	Diaz Lake (EIR Table 5-2, Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X		
X		X			Eastern California Museum (EIR Tables 4-3 and 5-3)			X		
X	X				Farmers Pond (EIR Impact 10-5, 10-18, 11-1, EIR Table 5-2)			X		
X	X				Fish Springs Hatchery (EIR Impact 10-14)			X		
X			X		Five Bridges Area Revegetation Project (300 acres; EIR Impact 10-12)	LA ^{7,8}			IC	

1991 EIR Mitigation	1991 EIR Environmental Projects	1991 EIR E/M Project	Revised Project	1997 MOU	LADWP MITIGATION PROJECT COMMITMENTS	Completed	Implemented as Required ²	Implemented and Ongoing ³	Fully Implemented Not Met Goals ⁴	Not Fully Implemented ⁵
				X	Freeman Creek Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X ⁷	IC	
X				X	Hines Spring (1 to 2 acres, EIR Impact 10-14), implemented as the Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3)			X		
X			X		Hines Spring South (EIR Impact 10-11)			X		
				X	Hines Spring Well 355 Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X		
				X	Homestead Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X ⁷	IC ⁷	
X			X		Independence 105 (EIR Impact 10-13)	LA			IC ⁷	
X			X		Independence 123 (EIR Impact 10-13)	LA			IC ⁷	
X			X		Independence 131 (EIR Impact 10-13)			X	IC ⁷	
X		X			Independence Ditch System (EIR Table 4-3)			X		
X		X			Independence East Side Regreening Project (23 acres; EIR Impact 10-11, EIR Table 5-3)			X		
X		X			Independence Pasturelands and Native Pasturelands (610 acres; EIR Impact 12-1, EIR Tables 4-3 and 5-3)			X		
X		X			Independence Roadside Rest Area (0.5 acres; EIR Tables 4-3 and 5-3)			X		
X		X			Independence Springfield (286 acres; EIR Impact 12-1, EIR Tables 4-3 and 5-3)			X		
X		X			Independence Woodlot (20 acres; EIR Impact 10-11, EIR Table 4-3)			X		
X	X	X			Klondike Lake Aquatic Habitat (160 acres; EIR Impact 10-5 and 11-1, EIR Tables 4-3, 5-2, and 5-3)			X		
			X		Klondike SSHA (Big Pine Ditch System MND)			X ⁷		
			X		LAWS 118 (19 acre portion) (Laws Type E Transfer MND)				X ⁷	
			X		LAWS 129 (Laws Type E Transfer MND)				X ⁷	
			X		LAWS 27 (Native Seed Farm) (Laws Type E Transfer MND)				X ⁷	
			X		LAWS 90 (Laws Type E Transfer MND)				X ⁷	
			X		LAWS 94 (Laws Type E Transfer MND)				X ⁷	
			X		LAWS 95 (Laws Type E Transfer MND)				X ⁷	
X			X		Laws Area Revegetation Project (140 acres; EIR Impact 10-18)	LA			X ⁷	
X		X			Laws Historical Museum Pasturelands (21+15 acres; EIR Impact 10-18, EIR Table 5-3)			X		
X		X			Laws/Poleta Native Pasture (216 acres; EIR Impact 10-16, EIR Tables 4-3 and 5-3)			X		
X	X				Little Blackrock Springs (EIR Impact 10-14, EIR Table 5-2)			X		
X		X			Lone Pine East Side Regreening (11 acres; EIR Impact 10-16, EIR Table 5-3)			X		
X		X			Lone Pine-North Lone Pine Clean Up (EIR Table 4-3)	X				
X		X			Lone Pine Riparian Park (320 acres, EIR Tables 4-3 and 5-3)			X		
X		X			Lone Pine Sports Complex (EIR Table 5-3)	X				
X		X			Lone Pine West Side Regreening (8 acres; EIR Impact 10-16, EIR Tables 4-3 and 5-3)			X		
X		X			Lone Pine Woodlot (12 acres; EIR Impact 10-11, EIR Table 4-3)			X		

1991 EIR Mitigation	1991 EIR Environmental Projects	1991 EIR E/M Project	Revised Project	1997 MOU	LADWP MITIGATION PROJECT COMMITMENTS	Completed	Implemented as Required ²	Implemented and Ongoing ³	Fully Implemented Not Met Goals ⁴	Not Fully Implemented ⁵
X	X	X		X	LORP Project (60 miles, perhaps more than 1,000 acres)/ Lower Owens Rewatering Project)			LA	IC ⁶	
X		X			McNally Ponds and Native Pasturelands (300 acres pasture, 60 acres ponds; EIR Impact 10-5 and 10-18, EIR Tables 4-3 and 5-3)			X ⁷	IC	
X	X	X			Millpond Recreation Area (EIR Impact 10-5, EIR Table 5-2 and 5-3)			X		
				X	North of Mazourka Canyon Road Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X		
X					Reinhackle Spring (EIR Impact 10-14)			X		
X		X			Richards Fields (160 acres; EIR Impact 10-16, EIR Table 4-3)			X		
X	X				Saunders Pond (EIR Impact 10-5, EIR Table 5-2)			X		
X		X			Shepherd Creek Alfalfa Field (198 acres; EIR Impact 10-11, EIR Tables 4-3 and 5-3)			X		
X		X			Shepherd Creek Potential (60 acres; EIR Impact 10-11, EIR Table 5-3)	X				
X					Steward Ranch (EIR Impact 9-14)	X				
X			X		Tinemaha 54 Revegetation Project (EIR Impact 10-11)				X	
X		X			Tree Planting along Roadways (EIR Table 4-3)			X		
X	X				Tule Elk Field (EIR Table 5-2)			X		
X		X			Van Norman Fields (170 acres; EIR Impact 10-16, EIR Table 4-3)			X		
				X	Warren Lake Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X		
				X	Well 368 Project (Additional Mitigation Projects Developed by the MOU Ad Hoc Group (MOU Section III.A.3))			X		

¹ Project has no outstanding commitments
² These measures are only implemented when necessary (monitoring and reporting for mitigation measures for new projects, construction, etc.)
³ Project is fully implemented and is currently meeting goals; however, there are ongoing water or financial commitments or monitoring and reporting requirements
⁴ Project is fully implemented but has not yet met, or has failed to sustain prescribed goals or success criteria
⁵ Project under development or under construction, but not fully implemented
⁶ Inyo County- Many but not all LORP goals have been achieved (see LORP Annual Report).
⁷ Project currently under review
⁸ LADWP has expressed to the MOU parties that they no longer consider this project complete.