



(760) 872-1168
FAX: (760) 873-5695

EMAIL: mail@inyowater.org
WEB: www.inyowater.org

163 May Street
Bishop, CA 93514

**COUNTY OF INYO
WATER DEPARTMENT**

April 28, 2008

Mr. Gene Coufal
Manager, Aqueduct Business Group
Los Angeles Department of Water and Power
300 Mandich Street
Bishop, CA 93514

SUBJECT: Water Department comments on Annual Operations Plan

Dear Gene:

On April 18, 2008, LADWP provided the Inyo County Water Department with LADWP's proposed Owens Valley Operations Plan for Runoff Year 2008-2009 (proposed plan). The proposed plan is contained in Section 2 of LADWP's draft Annual Owens Valley Report. This letter presents the Inyo County Water Department's comments on the proposed plan, in accordance with the Water Agreement and Interim Management Plan (IMP). These comments pertain only to Section 2 of the Owens Valley Draft Annual Report for Runoff Year 2008-2009; comments on other sections of the report will be prepared later.

General Comments

Compliance with Interim Management Plan. The Standing Committee endorsed an IMP on March 19, 2007 with the intent of providing a simple and somewhat automatic method of setting pumping levels in each wellfield for runoff-years 2007, 2008, and 2009. Sections 8.b.i, 8.b.ii, Exhibit A, and Exhibit B and subsequent amendments set forth a mechanism for setting pumping amounts that maintain April, 2007 water table elevations with exceptions providing for sole-source groundwater supply needs. The proposed plan presents total pumping of 66,800 acre-feet in the Owens Valley for the 2008 runoff-year. The Water Department finds that the proposed plan's pumping amounts given in Tables 3 and 7 are consistent with the IMP.

In-valley uses. The proposed plan is unclear in its description of in-valley uses. For example, page 2-4 states that the proposed plan "focuses on meeting minimum in-valley uses," page 2-5 states that all in-valley uses will receive a "full water allotment," and page 2-27 states that "full allotments will be available for most in-valley uses." The proposed plan should fully disclose the anticipated 2008-09 water supply to each E/M and mitigation project. This will avoid misunderstandings and provide clarity to the plan. A useful addition to the proposed plan (and future Annual Operations Plans) would be a table showing how

pumping from each wellfield is intended to be used, similar to Table 8, but broken down by wellfield and with sole-source allotments identified.

Accounting of LORP supply. Table 8, which shows water uses in the Owens Valley, denotes 37,100 acre-feet of water expected to be used for the LORP and 68,000 acre-feet used for Owens Lake dust abatement. It appears to us that 37,100 acre-feet includes all releases made to the LORP, but does not account for either reuse of water provided to the LORP on Owen Lake, or return of LORP flows to the Los Angeles Aqueduct. If this is the case, the figures in Table 8 are misleading in that some of the water tabulated is either used twice (if it both supplies the LORP and is then routed to dust abatement projects), or is returned to the Aqueduct via the pump-back station. Also, the text on page 2-27 states that the LORP will consume 28,300 acre-feet of water during runoff-year 2008, which disagrees with the 37,100 acre-feet given in Table 8.

Specific Comments

Page 2-1, paragraph 2. The reference to section 2.2 of the IMP is unclear. It appears that this should refer to section 8.b of the IMP.

Page 2.4, paragraph 2. Wells supplying Enhancement/Mitigation projects are not generally or necessarily exempt.

Page 2-6, Table 2. The heading on the next to the last column should be 'April 2008 Status.'

Page 2-10, Table 5. By our calculations, the April 2009 depth-to-water forecast for well T492 should be 32.3 feet, not 34.8 feet.

Page 2-13, paragraph 1. Well 236 was for supplemental irrigation supply when well 365 was insufficient to supply irrigation needs. Since the exemption for well 236 was granted, it has become the primary irrigation supply well. A January 4, 2007 letter from LADWP to the Water Department stated that LADWP staff was evaluating the potential for returning well 365 to full capacity. Following the "completion of remediation," they would determine whether further CEQA review would be necessary. Please inform us as to whether W236 will remain as the primary supply well and whether W365 will resume as the main irrigation water source.

Page 2-19, paragraphs 1 and 2. Given the proposed pumping of 6,800 acre-feet from the Taboose-Aberdeen wellfield and the stated capacity of 1,810 acre-feet for well 118, it appears that it is planned to use well 349 for export pumping. Paragraph 2 seems to say that well 349 will be used only to maintain the Seeley Pond. Please clarify which wells will be used and how they will be pumped to supply 6,800 acre-feet.

Page 2-23, paragraph 3. For operational testing to resume, the monitoring site needs to be in on status *and* the Technical Group needs to agree on a test plan. The Water Department will shortly be providing LADWP with a letter regarding IMP Amendment #4.

Page 2-27, paragraph 1. The pumping plan does not include supplying water to the McNally Ponds. This E/M project was also identified as a mitigation measure in the 1991 EIR. Will the adjacent McNally 100-acre native pasture receive an irrigation supply? In addition, regardless of whether, "In most normal

or below normal runoff year since 1991, the Standing Committee has approved not operating the McNally Pond project because of lack of E/M supply well capacity,” the project may only be modified or discontinued in full compliance with CEQA, not just Standing Committee approval.

Sincerely,

Robert Harrington, Acting Director

Cc: Board of Supervisors
Water Commission
County Administrative Officer
County Counsel