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**COUNTY OF INYO  
WATER DEPARTMENT**

May 30, 2002

Mr. Gene L. Coufal  
Manager, Aqueduct Business Group  
300 Mandich Street  
Bishop, California 93514

Subject: Comments on LADWP's Final Operations and Pumping  
Plan 2002-2003 Runoff Year

Dear Gene:

On April 20, 2002, LADWP provided the Inyo County Water Department ("ICWD") with LADWP's proposed "2002-2003 Operations Plan and Pumping Program". On May 10, 2002, the ICWD provided comments on the proposed plan. By letter dated May 23, 2002, LADWP provided the ICWD with a "Final 2002-2003 Annual Operations Plan." This letter presents the ICWD's comments on LADWP's final plan. Comments on each wellfield are presented below.

Laws

The proposed plan called for the pumping of 2,700 acre-feet. In the ICWD's previous comments, it was noted that the pumping was likely to affect the water levels under the three parcels subject to the McNally Canals Dispute. The additional pumping of 1,600 AF from exempt well 365 called for in the final plan may exacerbate the drawdown under the parcels. As stated at the Technical Group meeting, if there is no resolution of the McNally canal issues, the County will seek the operation of the Lower McNally canal to spread water in the vicinity of the three parcels to recover the water tables at the Technical Group, the Standing Committee, and if necessary, through dispute resolution.

The final plan does not provide for the full irrigation of the Laws Ranch. As stated at the Technical Group, if the Standing Committee does not agree on a plan for the irrigation of the ranch, the County will seek the irrigation of all Type E lands and all lands irrigated since 1981-82 through dispute resolution.

Bishop

In vegetation parcel BIS085, vegetation conditions in 2001 were below baseline and the water table was estimated to be below baseline. Vegetation parcel BIS085 is located in the vicinity of Wells 408, 140 and 141, but tools to analyze whether the operation of these wells affects the water level under this parcel have not been developed. It is recommended that the Technical Group develop such tools.

### Taboose-Aberdeen

The County continues to believe that at least one additional monitoring well in the vicinity of Well 349 is necessary. At the next meeting of the Standing Committee, the County will request the Standing Committee to agree to the installation of at least one new monitoring well.

### Thibaut-Sawmill

For the reasons stated in the ICWD's previous comments, the County believes that Well 382 should not be operated until a monitoring program for Thibaut springs area has been adopted by the Technical Group.

### Independence

The final plan calls for all pumping only from exempt wells. The proposed pumping is acceptable provided that no exempt well is pumped to supply offsite E/M replacement water unless the well is exempt because its operation will have no impact on groundwater dependent vegetation.

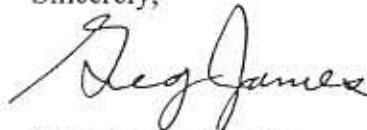
### Bairs-Georges

As stated at the Technical Group, and in the ICWD's previous comments, the Agreement, Green Book and FEIR all require that the Technical Group implement a monitoring program at Reinhackle Spring. As I understand the situation, LADWP is monitoring the springflow and has installed an alarm to warn if the springflow drops below a specified level. However, the Technical Group has not agreed on a monitoring plan for the spring. The Water Department will work with LADWP on the development of a monitoring plan for the spring prior to the planned commencement of pumping from non-exempt wells next fall. However, if the Technical Group has not agreed upon a monitoring plan, the County likely will seek to prevent the operation of the non-exempt wells through dispute resolution.

### Conclusion

Provided that the Technical Group and the Standing Committee approve a report from the Technical Group to the Standing Committee that is substantially the same as the attached draft report, the ICWD will recommend that the County concur in LADWP's Final 2002-2003 Operations Plan.

Sincerely,



Greg James, Director  
Inyo County Water Department

cc: Members of the Inyo County Board of Supervisors  
Members of the Inyo County Water Commission  
Inyo County Administrator  
Inyo County Counsel

# INYO/LOS ANGELES TECHNICAL GROUP

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# DRAFT

*Working toward mutual cooperation*

May 31, 2002

TO: Inyo County/Los Angeles Standing Committee

FROM: Inyo County/Los Angeles Technical Group

Request For Adoption Of This Report to the Standing Committee on the Following Subjects:

- (1) 2002-2003 Runoff Year Owens Valley Operations Plan
- (2) Drought Recovery Policy
- (3) Reductions in Water Supply to Specified Enhancement/Mitigation Projects
- (4) Irrigation Water at Laws Ranch

### *Owens Valley Operation Plan, 2002-2003 Runoff Year*

The 2002-2003 Annual Owens Valley Operations Plan has been prepared in accordance with the Inyo/LA Long Term Agreement for the period of April 1, 2002 to March 31, 2003. Forecasted Owens Valley runoff is 76 percent of normal. According to the provisions of the Agreement, 147,885 acre-feet of water are available for pumping from Owens Valley wellfields. In consideration of Inyo County's expressed concern regarding vegetation conditions in select areas of the Owens Valley and LADWP conservative pumping practices, the LADWP plan includes only 86,000 acre-feet of groundwater pumping.

The planned pumping will maintain relatively stable groundwater levels. Due to the success of the Drought Recovery Policy, water tables have significantly recovered throughout the valley. During this year of below average runoff, the water table is expected to decline naturally throughout the valley. The pumping planned by LADWP will likely lead to temporary water table depression in parts of most of the Owens Valley wellfields.

ICWD and LADWP are currently working together to develop, and present to the Technical Group for approval, pump test protocols for the following wells:

- Wells 378, 379, and/or 389 screened only in the deep aquifer. These wells, which are located in the Big Pine Wellfield, will be tested in order to determine if new management criteria for the operation of these wells can be developed which can augment or replace ON/OFF management.
- Well 415, a replacement for the Big Pine town supply well, which has been installed in accordance with the Agreement.
- Well 416, a new production well in Lone Pine, which has been installed in accordance with the Agreement.

In addition, ICWD and LADWP are currently working together to develop and present to the Technical Group for approval new management criteria for Wells 380 and 381 which can augment or replace ON/OFF management. (These wells, located in the Thibaut-Sawmill Wellfield, are screened only in the deep aquifer).

The Technical Group has agreed that any groundwater pumping which occurs as a result of testing Wells 378, 379, 389, 380, 381, 415, and 416 will result in a reduction of pumping from other wells in the Owens Valley so that the total volume pumped from Owens Valley wellfields during 2002-2003 will remain at 86,000 acre-feet (not including the operation of wells for freeze protection). LADWP and ICWD will jointly select the wells from which pumping will be reduced.

Following discussions since the transmittal of a proposed plan on April 20, 2002, LADWP transmitted a Final 2002-2003 Runoff Year Owens Valley Operations Plan to the ICWD by letter dated May 23, 2002. ICWD and LADWP are in concurrence with the plan.

### *Drought Recovery Policy*

The Drought Recovery Policy was adopted by the Standing Committee in the early 1990s. LADWP and the ICWD have differing interpretations of whether the Drought Recovery Policy has expired.

LADWP has taken the position that the DRP has expired. LADWP commissioned Montgomery Watson Harza (MWH) to evaluate the Drought Recovery Policy (DRP). In November 2001, MWH completed the comprehensive Drought Recovery Policy Evaluation Report that documented substantial soil moisture and water table recovery in the seven Owens Valley wellfields subject to the DRP. LADWP has reviewed MWH's report, considered subsequent correspondence from the Inyo County Water Department and MWH regarding the DRP report, and participated in public meetings about MWH's DRP findings. Having considered all of the foregoing, LADWP determined, as called for in the DRP, that there has been a substantial recovery in soil moisture and water table conditions in areas of Types B, C, and D vegetation that have been affected by groundwater pumping. As a result, LADWP prepared its 2002-03 management plan according to the provisions of the Water Agreement.

ICWD believes that the DRP is still in effect in areas of the valley. The ICWD has responded in writing to the MWH work, and the ICWD has concluded that MWH's work is severely flawed for several reasons including the following: (1) MWR concludes that the DRP has expired notwithstanding the fact that the goal of the DRP is to meet the vegetation protection goals of the Water Agreement and this goal has not yet been met in many areas of the valley, (2) MWH adopted an arbitrary standard for concluding that the DRP has expired that completely ignores vegetation conditions, (3) MWH employs a too large, wellfield-wide scale in its consideration of conditions rather than the smaller areas utilized in the Water Agreement, (4) MWH's work does not accurately portray relevant conditions.

Notwithstanding these differing interpretations, LADWP and the ICWD have worked together to reach concurrence on the 2002-2003 plan. Therefore, it is understood that by adopting this report: (1) the Standing Committee has not concluded that the Drought Recovery Policy has, or has not, expired, (2) the County is not prevented from subsequently challenging the LADWP's interpretation that the Drought Recovery Policy has expired, and (3) the County is not prejudiced in any way in any subsequent challenge of LADWP's interpretation of the status of the Drought Recovery Policy.

### *Reductions in Water Supply to Specified Enhancement/Mitigation Projects*

As a result of the low runoff, Los Angeles' conservative wellfield pumping, and limited E/M well supply for E/M project use, the Final Operations Plan calls for a reduction of approximately 5,000 acre-feet in water supplied to some E/M projects. The scheduled supply reduction for this year to the Lower Owens River Project is 3,000 acre-feet, Laws area ponds and pasturelands supply will be reduced by 1,500 acre-feet, and Klondike Lake supply will likely be reduced by 500 acre-feet. These reductions are similar to reductions for the same reasons in prior years and are not in addition to reductions in previous years.

The Water Agreement requires that "*the Department shall provide water to any enhancement/mitigation projects added since 1981-82, unless the Inyo County Board of Supervisors and the Department agree to reduce or eliminate such water supplies.*" Therefore, it is understood that by adopting this report the Standing Committee approves the reductions in water supply to E/M projects as described above and in the 2002-2003 plan.

### *Reduction in Irrigation Water at Laws Ranch*

As a result of litigation between LADWP and a lessee of Los Angeles-owned land in the Law area, and as a consequence of other factors, an area on Type E vegetation known as the Laws Ranch has not been fully irrigated for several years and will not be fully irrigated this year. However, a plan for the full irrigation of the ranch is being developed by the Technical Group and will be submitted to the Standing Committee for approval once it is completed. (The area of the ranch and the portion of the ranch that will be irrigated this year are shown on the attached map.)

### ***Conclusion***

The Technical Group respectfully requests that the Standing Committee adopt this report and the understandings set forth herein. Thank you for your consideration of this request.