

## Where to send your letter

Send or fax written comments by January 14, 2003 (Attn: Clarence Martin, LADWP, 300 Mandich Street, Bishop, CA 93514, fax 760-873-0266). If you can, please also send a copy of your comments to the Inyo County Board of Supervisors, P.O. Drawer N, Independence, CA 93526.

## Sample Letter

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:

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.

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.

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,

Prudent Waters, Concerned Citizen

## Donations

To support our work and the costs of printing and distributing this flyer, please send tax-deductible contributions to the OVC Foundation, P.O. Drawer D, Lone Pine, CA 93545. Ph/fax 760.876.1845

## Owens Valley Committee

The Owens Valley Committee is a non-profit citizen action group dedicated to protecting the natural resources of the Owens Valley by monitoring water and land management, educating the public, and encouraging participation in local government. The OVC Foundation is a 501(c)3 charitable organization. (<http://www.ovcweb.org>)



*We watch the water*

# L O R P:

## An environmental mitigation project



**... or just a third barrel of the  
Los Angeles aqueduct?**



**IT'S UP TO YOU!**

**Comments on the Lower Owens  
River Project Draft EIR due  
January 14, 2003**

## What is the LORP?

Since 1913, Los Angeles' surface water diversions and groundwater pumping in the Owens Valley have destroyed springs and seeps, dried the Owens Lake and the lower Owens River, and caused incalculable harm to migrating and endemic wildlife.

The LA Department of Water and Power is legally obligated to compensate for severe 1970-1990 groundwater pumping damage by implementing the Lower Owens River Project (LORP). The LORP promises to restore 62 miles of the lower Owens River; to maintain, enhance and create hundreds of acres of new habitat for waterfowl and other wildlife; and to greatly improve the warm water fishery. The project has enormous potential for enhancing recreation and improving local economies.

A Draft Environmental Impact Report and Environmental Impact Statement (DEIR/EIS) for the project was released for public comment (that means you) on November 1, 2002. As it stands, the document inadequately describes the Lower Owens River Project. If the LORP is implemented as described in the DEIR/EIS, LADWP won't fulfill its legal obligations and may even be able to export more groundwater from the Owens Valley.

Your comments are needed to ensure that LADWP both meets its legal obligations and repairs some of the severe environmental damage it has caused.

## What to say

The DEIR/EIS fails to describe essential components of the project and presents alternatives that directly violate the 1991 Long Term Water Agreement. We urge you to:

### 1) Insist on a 50 cfs pump station and 9 cfs baseflows to the Owens River delta

LADWP's chief purpose in the eastern Sierra is the export of water to LA. LADWP agreed to a maximum 50 cfs capacity pump station in 1991 to

alleviate Owens Valley residents' fears that they would use the LORP to export more groundwater. In the DEIR/EIS project description, LADWP proposes to triple the size of that pump station, in violation of the 1991 Water Agreement.

The larger pump station would provide LADWP with the opportunity to export more groundwater. The EPA has already determined that unless LADWP intends to increase

groundwater pumping, a larger pump station is not economically or environmentally justified. LADWP has already hired a consultant to explore more groundwater pumping, but asks the public to simply trust them not to use the larger pump station to export more water.

Furthermore, under the LADWP proposal, flows to the delta will be much lower than they have been over the past decade or more. Lower flows may not maintain existing delta habitats and are unlikely to create new habitats as required by the LORP goals. They will damage the area just below the delta, within an Audubon Society Nationally Significant Important Bird Area. A larger pump station would significantly worsen this problem by eliminating seasonal habitat flows to the river delta.

To avoid the possibility of more groundwater pumping, avoid damage to the delta, and encourage creation of new delta habitats as required, demand implementation of the smaller 50 cfs pump station alternative and the highest possible annual average delta baseflows of 9 cfs.

### 2) Demand funding option 2 and insist that LADWP ensure full funding for the LORP

LADWP is legally required to periodically assess how well the LORP is working and adjust management accordingly. But the DEIR/EIS states

***The EPA has already determined that unless LADWP intends to increase groundwater pumping, a larger pump station is not economically or environmentally justified.***

with the opportunity to export more groundwater. The EPA has already determined that unless LADWP intends to increase

that "monitoring and adaptive management," which are critical to the success of the project, will only be adopted if funding is available. LADWP has made hundreds of millions of dollars in profits from Owens Valley water and will spend more on public relations in one year than the predicted 15-year budget shortfall for the LORP. Adaptive management won't work without money. Demand that LADWP meet its legal obligations and commit to funding the full project by choosing funding option two.

### 3) Insist on a recreation plan

The DEIR/EIS fails to describe adequate plans for balancing different recreational uses with grazing and habitat protection. It has no plans for managing new and increased recreational uses expected to result from the LORP, or for protecting cultural resources. There is also no assessment of current conditions in the lower Owens River area so that changes in usage can be noted and managed. Ask for a thorough assessment of current and potential recreational use in the LORP area and for a plan to manage that recreation in order to protect natural habitats and cultural resources.

## Where can I find more information?

To review the LORP DEIR/EIS on the web visit <http://lorpeir.com> or go to one of the Inyo County public libraries, the Inyo County Water Department (163 May Street in Bishop), Inyo County Planning Department, Owens Valley Indian Water Commission, the San Francisco EPA Library or LADWP offices.

Also, check our website for updates and additional DEIR/EIS issues you may want to include in your comment letter (<http://www.ovcweb.org>).

