A bad day lasts a long time

The photos and monitoring data on this website document the ongoing desertification of parcel BLK094 and the urgent need for management change to allow water table recovery. After observing this desertification for years, and after watching the Technical Group (TG)[1] take no action for years, the Bristlecone Chapter of the California Native Plant Society (CNPS) formally requested management modification in 2006. The chronology below documents the Bristlecone Chapter's requests and the TG's response. Please note that almost 2 ½ years after the initial request the TG has yet to even have a serious discussion of this problem, much less take any action.

Date	Venue	Action
Spring 2006	TG meeting	In public comment period CNPS invoked EIR[2] and asked that management be modified at parcel BLK094.
May 4, 2007	TG meeting	In public comment period CNPS repeated comment made in 2006 but also asked that issue be agendized at the next TG meeting. DWP's Gene Coufal said to write the TG a letter.
July 13, 2007	TG	CNPS sent letter to TG citing data showing why current management cannot be in compliance w/ LTWA and proposing a simple management modification to solve the problem.
November 1, 2007	TG meeting	As part of response to CNPS comment on another matter, Gene Coufal mentions DWP is working on a draft response to Blackrock letter of July 13, 2007
January 29, 2008	SC[1] meeting	Blackrock issue is on the agenda. Gene Coufal mentions DWP has sent Inyo a draft response to CNPS Blackrock letter and is awaiting Inyo's reply. Inyo's Bob Harrington says Inyo is working on document analyzing measurability and attributability
February 2008		Radio KSRW obtains copy of DWP draft reply (from Inyo County) and releases it to public. The draft document does not address the data cited in CNPS letter.
April 30, 2008	TG meeting	Blackrock issue is on the agenda. At meeting, TG isn't prepared to discuss issue. Inyo states it's still working on letter to DWP. TG approves 2008-2009 annual pumping program (including Blackrock area) notwithstanding its admitted lack of preparation to discuss existing management problems
August 11, 2008	SC meeting	In public comment, CNPS points out that TG approved 2008-2009 pumping program at same meeting it admitted it wasn't prepared to discuss management problems at Blackrock. This raises questions about the thoroughness of TG's considerations of pumping plans. DWP General Manager David Nahai asks TG to make Blackrock issue a priority.
October 9, 2008	TG meeting	Blackrock issue is on the agenda. At meeting, TG not prepared to discuss issue. Inyo states it's still working on letter to DWP analyzing attributability, measurability, and significance.
October 18, 2009	TG	Due to TG delay, CNPS sends a letter clarifying its initial letter (July 13, 2007). To facilitate the TG's deliberations, CNPS requests an answer to one question: "Does TG think it supplies adequate moisture

		to maintain baseline vegetation, and, if so, how?" It states that analysis of measurability, attributability and significance is not what is sought.
November 5, 2008	SC meeting	Blackrock issue is on the agenda. Inyo reports it's still working on letter to be sent to DWP analyzing attributability, measurability, significance. No mention is made of CNPS's letter of clarification.
December 15, 2008	Inyo Water Commission meeting	Blackrock issue is on the agenda. Bob Harrington reports Inyo is still working on letter to be sent to DWP analyzing attributability, measurability, significance. CNPS explains that it simply seeks answer to question "Does TG think it supplies adequate moisture to maintain baseline vegetation, and, if so, how?"

[1] Los Angeles manages groundwater under the terms of the 1991 Inyo-LA Long Term Water Agreement (LTWA). The LTWA recognizes a Technical Group (TG) – composed of technical experts from Inyo and DWP -- which is responsible for managing pumping. The LTWA also recognizes a Standing Committee (SC) – composed of political leaders from Inyo and LA – for making policy interpretations.

[2]City of Los Angeles Department of Water and Power and Count of Inyo 1991. Response to comments on September 1990 draft environmental impact report (SCH #89080705). Vol I. pg 2-29.

> "However, should it be believed that a significant effect on the environment (as defined under CEQA) has or will occur due to the project, any person may bring the matter to the attention of Los Angeles or Inyo County and/or employ any other available legal right or remedy, including CEQA."