

March 22, 2019

Mr. Erik Ekdahl
Deputy Director
Division of Water Rights
State Water Resources Control Board
1001 I Street, 14th Floor
Sacramento, California 95814

Dear Mr. Ekdahl:

Subject: Proposed Amendment to the Los Angeles Department of Water and Power's
Temporary Urgency Change Petition Dated January 22, 2019

The Los Angeles Department of Water and Power (LADWP) respectfully requests that the State Water Resources Control Board (SWRCB) approve the Proposed Amendment to LADWP's Temporary Urgency Change Petition dated January 22, 2019 (Amendment). On March 14, 2019, LADWP discussed the Amendment in a conference call with representatives from the Mono Lake Committee, California Trout Inc., and stream scientists Dr. William Trush and Mr. Ross Taylor. There is consensus to support the Amendment as herein enclosed. The implementation of the Amendment will commence on April 4, 2019.

LADWP appreciates your attention to this request. If you have any questions or concerns, please contact Dr. Paul C. Pau, Environmental Engineering Associate, at (213) 367-1187.

Sincerely,



Clarence E. Martin
Manager of Aqueduct

PCP:jm

Enclosure

c/enc: Distribution List

Mr. Steve Marquez, SWRCB

Dr. Paul C. Pau

ENCLOSURE

MONO BASIN OPERATIONS PLAN UNDER THE AMENDED TUCP

INTRODUCTION

This is a proposed amendment to the Los Angeles Department of Water and Power's (LADWP's) Temporary Urgency Change Petition (TUCP), dated January 22, 2019. This proposed amendment to the TUCP covers a 6-month (180-day) period, starting on April 4, 2019 and ending on September 30th, 2019. Since the start date is April 4, 2019, the flow schemes proposed in the original TUCP will not be implemented.

The operation plan starting April 4, 2019, for the 180-day period, is presented herein below.

MONO BASIN OPERATIONS PLAN RY2019-20 UNDER THE AMENDED TUCP

Forecast for RY2019-20

The Mono Basin's April 1st forecast for RY2019-20 is not yet available. However, it is projected that RY2019-20 is either an "EXTREME-WET" or "WET" or "WET/Normal Years" year type. This operations plan covers all year types in accordance with the Draft Amended License for the 180-days starting April 4, 2019.

Rush Creek

EXTREME WET – Rush Creek Stream Ecosystem Flows (SEFs) will follow Table 1A of the Draft Amended License (Attachment); or

WET - Rush Creek SEFs will follow Table 1B of the Draft Amended License; or (Attachment); or

WET/Normal - Rush Creek SEFs will follow Table 1C of the Draft Amended License (Attachment).

It must be noted that current infrastructure may not allow LADWP to be able to deliver the magnitude of flows and duration listed in Table 1A and Table 1B when those flows exceed 380 cfs. Any failures in magnitude and duration for flow requirements in these tables above 380 cfs will not be constituted as a violation as long as LADWP makes efforts to manage Grant Lake Reservoir and Lee Vining Creek diversions in a manner that maximizes magnitude and duration of the peak flows above 380 cfs.

Although it is desirable to maximize Lee Vining Creek diversions in order to assist with maximizing magnitude and duration of the peak flows, the current infrastructure is not well suited for implementation of Table 2A for the Lee Vining Creek flows and diversions (see below for Lee Vining Creek discussion).

Lee Vining Creek

For both EXTREME WET AND WET year types, Lee Vining SEFs will follow Table 2A of the Draft Amended License (Attachment).

MONO BASIN OPERATIONS PLAN UNDER THE AMENDED TUCP

An exception to the flows in Table 2A will be made in September during fish monitoring activities where flow in Lee Vining Creek will be set to 28 cfs for up to two weeks in order to ensure the safety of the stream scientists and LADWP biologists performing the fish monitoring activities. The exact dates for the fish monitoring activities will be determined later in the year.

As mentioned in LADWP's Feasibility Report to the Synthesis Report and in the Petition for Temporary Urgency Change Application sent to the SWRCB in 2010, implementing Table 2A flows for Lee Vining Creek presents challenges for LADWP with current infrastructure as the current infrastructure does not function accurately when setting a constant diversion flow while Lee Vining Creek flow fluctuates.

In addition, in recent years Lee Vining Creek flow has fluctuated drastically on a day-to-day basis due to Southern California Edison operations upstream of the Lee Vining Creek Intake. This adds further concern to LADWP's ability to accurately implement flows as outlined in Table 2A.

LADWP will be implementing Table 2A flows to the extent that the current infrastructure allows, but also will be conservative in operations so ensure flows in Lee Vining Creek do not drop below the minimum specified flows as outlined in Table 2A. The conservative operations will most likely result in less water being diverted from Lee Vining Creek than allowed by Table 2A.

Parker and Walker Creeks

All flows will be continuously bypassed per Provision 11 c of the Draft Amended License.

Planned Exports for RY 2019-20

LADWP will export 16,000 AF for RY2019-20, but due to high runoff in the Eastern Sierra will delay the decision on the export timing until later in the runoff year.

Communication

LADWP will communicate with Mono Basin parties (Mono Lake Committee, California Trout, California Department of Fish and Wildlife), the stream scientists (Bill Trush and Ross Taylor), and the State Water Resources Control Board during the 180-day period to coordinate and gain input as SEFs proceed. Specifically, one conference call will be scheduled within a reasonable time of the April runoff forecast to discuss final year type and operations plan and address questions and stream scientist input that may result from the operations plan. LADWP will also provide reasonable communication to update parties, answer questions, and address unforeseen challenges as SEFs are delivered according to the April 1 forecast for RY 2019-20.

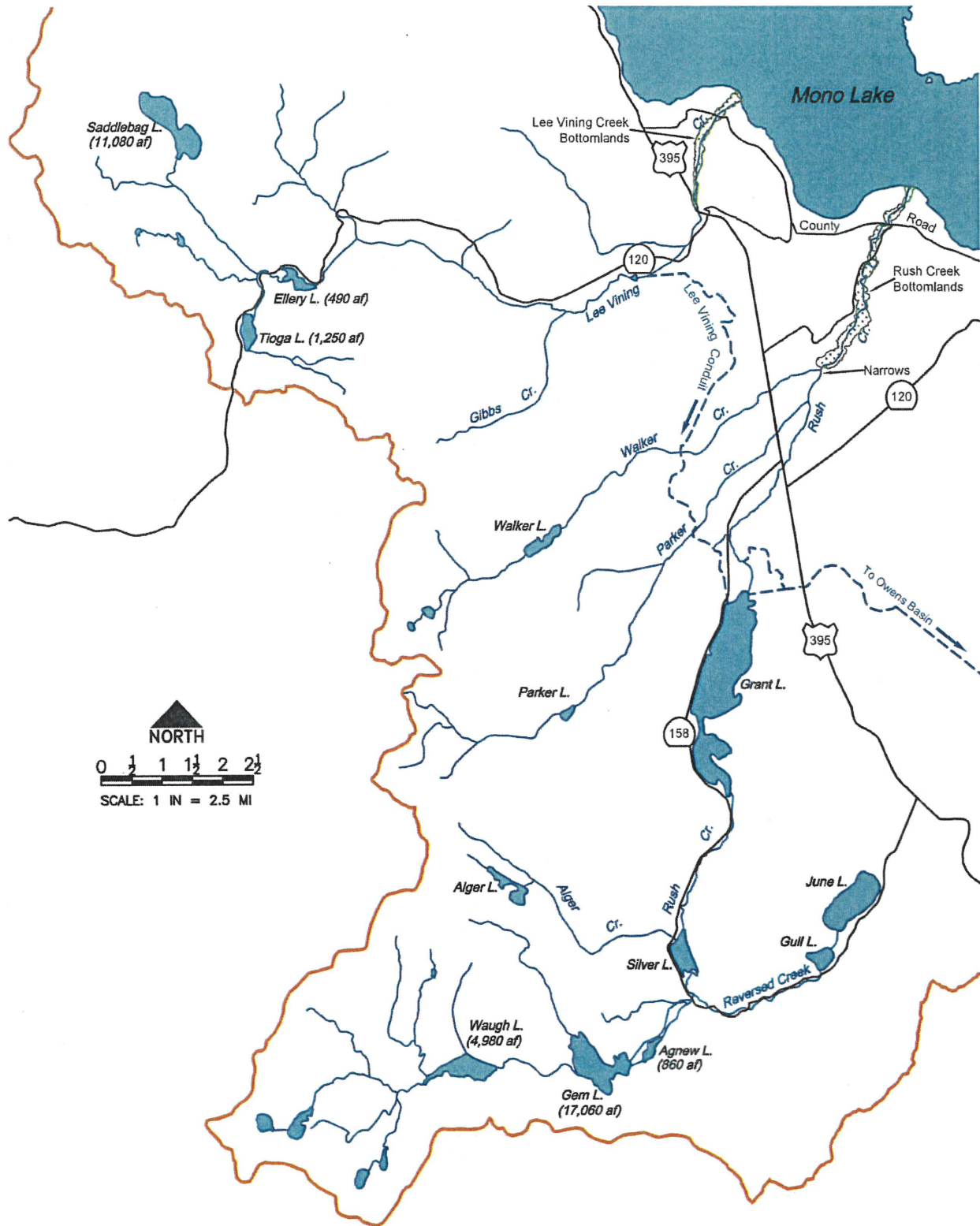


Figure 1-1. Major hydrologic features of the Mono Basin, CA and the location of Rush, Parker, Walker, and Lee Vining creeks. Storage reservoirs in the upper basins of Lee Vining and Rush creeks (with reservoir capacities indicated in the figure) are operated by Southern California Edison (SCE). Streamflow regulation and diversions occur (from north to south) via the Lee Vining Conduit, traversing Walker and Parker creeks, and into Grant Lake Reservoir on Rush Creek. Water is then exported from Grant Lake Reservoir into the Owens River basin via the Mono Craters Tunnel.

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044
County Clerk
County of: Mono
Bridgeport, CA 93517

Los Angeles Department
From: (Public Agency): of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012
(Address)

Project Title: Mono Basin Temporary Operation Petition to State Water Resources Control Board

Project Applicant: Los Angeles Department of Water and Power (LADWP)

Project Location - Specific:

Rush, Lee Vining, Walker, and Parker Creeks, Mono Basin, Mono County, CA

Project Location - City: Lee Vining Project Location - County: Mono

Description of Nature, Purpose and Beneficiaries of Project:

The State Water Resources Control Board flow requirements in the area under decision 1631 are being modified for three months to test the feasibility of stream scientists flow recommendations discussed in their Synthesis Report. The Synthesis Report was intended to accelerate the recovery of the Mono Basin ecosystem.

Name of Public Agency Approving Project: LADWP

Name of Person or Agency Carrying Out Project: LADWP

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
Declared Emergency (Sec. 21080(b)(3); 15269(a));
Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
[X] Categorical Exemption. State type and section number: Section 15301 (i)
Statutory Exemptions. State code number:

Reasons why project is exempt:

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public topographic features involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination. Example (i) denotes maintenance of wildlife habitat areas, stream flows, and stream channels to protect fish and wildlife resources.

Lead Agency Contact Person: Chuck Holloway Area Code/Telephone/Extension: 213-367-0285

If filed by applicant:

- 1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: Charles C. Holloway Date: 01/03/2019 Title: Manager of Environmental Planning and Assessment

[X] Signed by Lead Agency [] Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR:

RECEIVED

JAN - 3 2019

MC 19-001

OFFICE OF THE CLERK

Revised 2011

Posted thru February 12th, 2019

Mono Basin Distribution List

<p>Mr. Erik Ekdahl Division of Water Rights State Water Resources Control Board 1001 I Street, 14th Floor Sacramento, CA 95814</p>	<p>Ms. Lisa Cutting Mono Lake Committee P.O. Box 29 Lee Vining, CA 93541</p>
<p>Ms. Amanda Montgomery Division of Water Rights State Water Resources Control Board 1001 I Street, 14th Floor Sacramento, CA 95814</p>	<p>Mr. Bartshé Miller Mono Lake Committee P.O. Box 29 Lee Vining, CA 93541</p>
<p>Mr. Scott McFarland Division of Water Rights State Water Resources Control Board 1001 I Street, 14th Floor Sacramento, CA 95814</p>	<p>Dr. Eric Huber California Trout Inc. P.O. Box 3442 Mammoth Lakes, CA 93546</p>
<p>Dr. William Trush Humboldt State University River Institute c/o Department of Environmental Science and Management 1 Harpst Street Arcata, CA 95521-8299</p>	<p>Mr. Richard Roos-Collins Water and Power Law Group 2140 Shattuck Avenue, Suite 801 Berkeley, CA 94704-1229</p>
<p>Mr. Ross Taylor 1254 Quail Run Court McKinleyville, CA 95519</p>	<p>Mr. Marshall S. Rudolph Mono County Counsel P.O. Box 2415 Mammoth Lakes, CA 93546</p>
<p>Mr. Jon C. Regelbrugge USDA Forest Service P.O. Box 148 Mammoth Lakes, CA 93546</p>	<p>Mr. Steve Parmenter Department of Fish and Wildlife 787 North Main Street, Suite 220 Bishop, CA 93514</p>
<p>Ms. Tamara Sasaki California Department of Parks and Recreation P.O. Box 266 Tahoma, CA 96142</p>	<p>Mr. Doug Smith Grant Lake Reservoir Marina P.O. Box 21 June Lake, CA 93529</p>
<p>Matt Green California Department of Parks and Recreation PO Box 266 Tahoma, CA 96142</p>	<p>Board of Supervisors Mono County P.O. Box 715 Bridgeport, CA 93517</p>