

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter   | Comment   | Status/Response  |
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| 1   | Audubon California and Eastern Sierra Audubon Society | Issue: Master Plan references MOAs and lease as integral part of agreement structure, implementation and dispute resolution. The MOAs and the lease or leases need to be prepared, reviewed and agreed to prior to final approval of the Master Plan in order to confirm that parties are in agreement on all material issues. We propose that a Master Lease Agreement be drafted by SLC to incorporate and reference the Master Plan, particularly the HSM. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 2   | Audubon California and Eastern Sierra Audubon Society | 1-6 Figure 1-3 Add: The California DFG property, Cartago Springs, to this map.  | Incorporated. The figure has been updated to include CDFW land ownership.  |
| 3   | Audubon California and Eastern Sierra Audubon Society | 2 n/a Concern: Approval of Master Plan must be subject to review and approval of lease and permit agreements and MOAs.<br>Proposal: Require sign-off and execution of Master Plan to be contingent on review and confirmation of Master Lease Agreement and all MOAs.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.       |
| 4   | Audubon California and Eastern Sierra Audubon Society | 2-1 Line 26 Change: "...many species, including migrating birds." to: "...tens of thousands of migrating and breeding shorebirds and waterfowl."  | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report.   |
| 5   | Audubon California and Eastern Sierra Audubon Society | 2-2 Lines 20-22 Concern: Water conservation target of 50% not arrived at collaboratively.<br>Proposal: Adjust target based on collaborative review. A joint committee or meeting comprised of the Habitat Committee and Water Committee should determine the appropriate water conservation target and then report to Planning Committee for adoption in Master Plan.   | The Habitat Working Group met to discuss the water conservation target on September 10 and October 22, 2012. Agreement on the target was reached at the October 30, 2012, Agency Forum, and the January 28, 2013, Planning Committee meetings. This target reflects the consensus of the Planning Committee. The section and appendix have been augmented to describe how the target was established and feasibility was determined. |
| 6   | Audubon California and Eastern Sierra Audubon Society | 2-5 Lines 25 & 27 Change: "should" to "will"  | Comment not incorporated. The suggested edit is not appropriate for the Final Report. The Final Report is a report on Owens Lake Master Planning Collaboration and it is not a "Master Plan." Accordingly, the stronger language is not appropriate.   |
| 7   | Audubon California and Eastern Sierra Audubon Society | 2-5 Line 27 Add: 'Utilization standards' for vegetation use by cattle.  | Comment noted. The text has been expanded to state the following: "The Grazing Management Plan should include stocking rates, the protection of sensitive resources, including seeps and springs, utilization standards for vegetation use, and potentially fencing to manage cattle access to these areas." This may also be considered by the Habitat TAC at a later time.   |
| 8   | Audubon California and Eastern Sierra Audubon Society | 2-6 Line 10 Delete: "It is anticipated that"  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.       |
| 9   | Audubon California and Eastern Sierra Audubon Society | 2-7 Table 2-1 Concern: Habitat maintenance is of highest order and cannot be subordinated to water conservation.<br>Proposal: Change corresponding Monitoring Parameter column to state: "No net reduction in habitat value-acres or habitat guilds."   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.       |
| 10  | Audubon California and Eastern Sierra Audubon Society | 2-8 Section 2.3.3 Concern: Master Plan should propose specific projects for implementation; the review process for development and review of individual projects is unclear under the plan.<br>Proposal: Clarify the Master Plan to include detailed process for developing and reviewing individual projects.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.       |

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| 11  | Audubon California and Eastern Sierra Audubon Society | 2-8 Section 2.3.3 Concern: Master Plan requires plan proponents to come up with funding. Proposal: Include specific provisions covering funding. (Lines 13-14 to be updated per conversations with Coordinator Committee.)  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.                |
| 12  | Audubon California and Eastern Sierra Audubon Society | 3-12 Lines 1-11 Add: Notation of the 2001 designation of the Owens Lake Important Bird Area by the National Audubon Society.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 13  | Audubon California and Eastern Sierra Audubon Society | 3-20 Line 19 Add: "Burrowing owls have been recorded nesting along the Cottonwood Marsh road within the 3600 ft. contour."  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 14  | Audubon California and Eastern Sierra Audubon Society | 4. Issue: Implementation of any new BACM should be subject to the habitat suitability model and must be determined as a part of the planning process. If GBUAPCD approves a new BACM method, and SLC approves its use on the lake bed, at what point in the process does the TAC weigh in, in relationship to the Master Plan and potential impacts to the habitat value acres? | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. However, we recommend this topic be considered by the Advisory Committee for the Master Project.         |
| 15  | Audubon California and Eastern Sierra Audubon Society | 4-5 Figure 4-2 Add: "Photo credit – Mike Prather."  | Incorporated.   |
| 16  | Audubon California and Eastern Sierra Audubon Society | 4-8 Lines 22-24 Change: "must be transitioned to water-efficient BACM, such as tillage..." to: "may be transitioned to water-efficient BACM, such as tillage..." This section also needs to refer to other chapters and state that transition should occur without net loss of habitat per habitat acre.  | "Must" was not revised to "may" because transitions must occur in order to meet the water savings and efficiency target. The fourth bullet of evaluation criteria was expanded to say: Consistency with Planning Committee goals, including maintenance of habitat value-acres as described in Section 3.0, Habitat.  |
| 17  | Audubon California and Eastern Sierra Audubon Society | 4-8, 4-14 Section 4.4 Add: As part of the criteria for evaluating all new and modified BACM for Owens Lake, the future Technical Committee and Dust Control Group "shall consider the protection, creation, and enhancement of wildlife habitat in conjunction with Section 6.0 of the Master Plan."  | The fourth bullet of evaluation criteria was revised to state: " <u>Consistency with Planning Committee goals, including maintenance of habitat value-acres as described in Section 3.0, Habitat.</u> "   |
| 18  | Audubon California and Eastern Sierra Audubon Society | 4-10 Section 4.4.1.1 Add: "Hypersaline brine presents a wildlife risk." (See IMC ruling in Trona, CA that resulted in fines used to create the Dirty Socks Duck Club property at Owens Lake.)   | The text has been revised to state: "...environmental work on <u>wildlife risks from hypersaline brine</u> and technical feasibility testing will be necessary for compliance and implementation associated with dryer conditions."   |
| 19  | Audubon California and Eastern Sierra Audubon Society | 4-18 Lines 17-22 Concern: Habitat maintenance is of highest order and cannot be subordinated to water conservation or dust control measures. Proposal: Change enumeration to bullet points so that no maintenance activity is prioritized at the expense of others.   | Incorporated.   |
| 20  | Audubon California and Eastern Sierra Audubon Society | 4-19 Lines 19-20 Concern: Are semi-annual reports dependent on the date of individual response measures or part of a comprehensive report that will occur on the same dates each year? Proposal: Clarify based on the above. If the latter, either cross-reference to meeting schedule or insert dates.   | The text has been revised to state: "LADWP monitors and reports twice annually to the Commission and the District on dust conditions and future maintenance requirements <u>based on individual response measures.</u> "  |

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| 21  | Audubon California and Eastern Sierra Audubon Society | 4-19, 4-20 Section 4.8 Add: Habitat maintenance to list of monitoring parameters.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The Planning Committee did not reach consensus on Implementation, including monitoring; therefore, these topics were omitted from the Final Report. Accordingly, it was not necessary to address this comment.   |
| 22  | Audubon California and Eastern Sierra Audubon Society | Chapter 5. General Issue: The groundwater proposals have not been reviewed, nor was it determined with input from the Planning Committee. Review of the Planning Committee should be required prior to sign-off on those provisions. If groundwater withdrawal is subject to agreement between LADWP, the District, and Inyo County, how does this relate to the AC and the Master Plan? What role should groundwater have in the plan? The PC also never agreed to/discussed the goal of 50% water reduction; the feasibility of achieving this while maintaining baseline habitat should be reviewed by outside experts. This chapter also makes no reference to the work done to date by PC members on cataloging/prioritizing of the seeps and springs.<br>Proposal: Include a chart which shows historical water use on the lakebed to help put in perspective the 50% reduction; convene a meeting per recommendation above in Chapter 2. Convene a subcommittee to rank and catalogue seeps and springs (begun under the CAP process). | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address the groundwater portion of this comment. Regarding the water savings target, Section 4.0, Water Supply, Savings, and Efficiency, has been updated with new text to summarize two technical appendices that outline the determination of the water savings target and its feasibility. As noted in the section and appendices, the water savings target is no longer related to an annual water budget. It is based on the "through Phase 7" average annual water demand. |
| 23  | Audubon California and Eastern Sierra Audubon Society | 5-6 Line 9 Add: rainfall.   | Incorporated.   |
| 24  | Audubon California and Eastern Sierra Audubon Society | 5-6 Lines 12-13 Add: "...such as Owens Valley uses like agriculture, stockwater, enhancement/mitigation projects, etc. outlined in the 1991 Inyo/LA Long-term Water Agreement."   | The text has been clarified to state: "Water saved would be available for other beneficial uses, <u>as defined by law and subject to water rights.</u> "  |
| 25  | Audubon California and Eastern Sierra Audubon Society | 5-7 Line 7 Change: "dust control, habitat, and water conservation ..." to: "dust control, habitat maintenance, and water conservation ..."  | Incorporated.   |
| 26  | Audubon California and Eastern Sierra Audubon Society | 5-7 Section 5.3 Add: Reintroduction of OL Pup Fish (per DFG) to list starting on Line 22.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topics of groundwater and the reintroduction of pupfish were omitted from the Final Report because the Planning Committee did not reach consensus on these topics. Accordingly, it was not necessary to address this comment.  |
| 27  | Audubon California and Eastern Sierra Audubon Society | 5-7 Line 23 Concern: DFG and the HAC should be involved in determining (i) criteria to protect seeps and springs and (ii) what conditions will be necessary for existing wildlife & future reintroduction of fish.<br>Proposal: Add references to DFG and the HAC and define their roles in this context.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topics of groundwater and the reintroduction of pupfish were omitted from the Final Report because the Planning Committee did not reach consensus on these topics. Accordingly, it was not necessary to address this comment.  |
| 28  | Audubon California and Eastern Sierra Audubon Society | 5-8 Section 5.4 Concern: Monitoring must be aimed at ensuring that groundwater use is consistent with all objectives of the plan and habitat maintenance, in particular. Monitoring should also include baseline and future studies on aquatic invertebrates, fish, plants, and birds in the seep/spring areas to evaluate potential impacts over time.<br>Proposal: Section 5.4 should include specific references to the plan objectives and studies on aquatic invertebrates, fish, plants, and birds in the seep/spring areas.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 29  | Audubon California and Eastern Sierra Audubon Society | 6-1 Line 6 Change to: "National Audubon Society"  | Incorporated.   |
| 30  | Audubon California and Eastern Sierra Audubon Society | 6-30 Lines 1-11 Concern: Habitat objective is defined in the aggregate of habitat value-acres; objective should also specify there will be no reduction individual guilds.<br>Proposal: Expand habitat objective to include maintenance of (i) total baseline value-acres and (ii) individual guilds.   | This comment is addressed in the first sentence in this section, which states the following: "The habitat objective of the <u>Planning Committee</u> is to maintain the total baseline value-acres for each guild over time, while also achieving other goals of <u>dust control and water savings and efficiency.</u> "  |

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| 31  | Audubon California and Eastern Sierra Audubon Society | 6-30 Line 1 Change: "can" to "will"  | Not incorporated. Andrea Jones confirmed via email to Andrea Schmid on March 27, 2012, that this comment is an error.  |
| 32  | Audubon California and Eastern Sierra Audubon Society | 6-30 Lines 14-16 Concern: Unclear when the three year period for monitoring begins.<br>Proposal: Insert dates for monitoring period.   | The following statement was added: "Monitoring began in 2011."   |
| 33  | Audubon California and Eastern Sierra Audubon Society | 6-30 Line 17 Concern: Weighting of guilds can be changed unilaterally.<br>Proposal: Insert language that weighting of guilds can only change with recommendation by the Habitat TAC after X number of years (3 or 5).  | This comment is addressed in Section 3.4.1, which states the following: "The current HSM will be run for three years based on monitoring habitat parameters and validated using effectiveness monitoring data from bird counts in those three years. After three years, the current model may be refined based on additional information provided from the monitoring results." At the end of the section, it states: "Model refinement will be recommended by the Habitat TAC and follow the steps outlined in Section 3.6, Adaptive Management."   |
| 34  | Audubon California and Eastern Sierra Audubon Society | 6-30 Lines 31-32 Concern: Monitoring only takes place for a period of 3 years; unclear why the "State of the Lake" assessment requires a 5-year timeframe.<br>Proposal: Address additional 2 year period.  | It was determined with the Habitat Working Group (HWG) that a three-year timeframe was reasonable for validation of the HSM with effectiveness monitoring due to the level of resources necessary to complete such monitoring. The HWG also agreed that a five-year timeframe is reasonable for the "State of the Lake" given the additional resources necessary to refine the model. The following statement was added to the section: " <u>The Habitat Work Group determined that a five-year timeframe is reasonable given the resources necessary to refine the model.</u> "   |
| 35  | Audubon California and Eastern Sierra Audubon Society | 6-30 Section 6.4 Concern: There is no limit on the amount that a single guild's value-acres can be decreased in a given year (or 5-year timeframe).<br>Proposal: Individual guild's value-acres should only be allowed to decrease for a temporary period, on a project-by-project basis. A percentage agreed to by the Habitat Committee or square mileage (per GBUAPCD) of habitat and a time frame to transition should be identified. We recommend that this should be placed as an agenda item at the next habitat committee meeting. | Comment noted. The Habitat TAC may consider this at a later time.  |
| 36  | Audubon California and Eastern Sierra Audubon Society | 6-31 Section 6.4.3.1 Concern: Management objectives should be the same for all parts of the Owens Lakebed, not just the dust control area.<br>Proposal: Incorporate concept that habitat values and plan objectives must be maintained throughout Owens Lakebed.   | This section specifically regards the dust control project, as noted in the section title: Management Responsibilities and Toolbox for the Dust Control Project. The concern is addressed in Section 3.4.3.4, Habitat Management in Non-Dust Control Areas. In order to provide additional clarification, text was added to the introductory language of Section 3.4.3, Habitat Management and Project Planning, to specifically identify dust control areas and non-dust control areas of the planning area. The revised text states the following: "It is also an important predictive tool to guide the design and/or management of projects within the planning area, <u>including dust control areas and non-dust control areas</u> , to ensure that baseline value-acres for each guild are maintained over time." |
| 37  | Audubon California and Eastern Sierra Audubon Society | 6-32 Line 1 Change: "can" to "will"  | Incorporated.  |
| 38  | Audubon California and Eastern Sierra Audubon Society | 6-32 Section 6.4.3.2 Concern: There can be no net loss within each individual guild.<br>Proposal: Add language stating that there will be no net loss of habitat value-acres within each guild.  | Incorporated. Revised text states the following: "Accordingly, the balance sheet will evaluate the lake-wide balance of total value-acres for each guild <u>to ensure that there will be no net loss of value-acres within each guild.</u> "   |

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| 39  | Audubon California and Eastern Sierra Audubon Society | 6-35 Line 11 Concern: The term "sustainable" needs to be defined with reference to decision-maker. What does "resource protection criteria" refer to?<br>Proposal: Decision makers need to identify what defines sustainable over time and how that relates to "no net loss of habitat value acres in the entire planning area" TAC should have a role in ensuring that use of ground water is actually sustainable in terms of no habitat loss.                | The Planning Committee did not reach consensus on groundwater; therefore, this topic was removed from the document. The comment is no longer applicable.   |
| 40  | Audubon California and Eastern Sierra Audubon Society | 6-36 Line 8 Concern: Scope of Habitat TAC authority is not defined.<br>Proposal: Plan should make explicit that (i) Habitat TAC has power over the biologists and staff responsible for monitoring activities and preparing the annual monitoring report, (ii) the Habitat TAC will act on its own authority, (iii) DWP reports to the Habitat TAC in this arena, and (iv) the Habitat TAC will ultimately make recommendations to the full Advisory Committee. | The text was clarified to state the following: "The Habitat TAC <u>will</u> adjust the validation monitoring, <u>if needed</u> , with recommendations for additional information to be collected during the initial validation studies or for additional types of surveys." Section 3.5, Habitat Monitoring, describes the consensus of the Habitat Working Group regarding monitoring. The Habitat Working Group defined the process of adaptive management, including the process by which the Habitat TAC will review monitoring methods and data and make recommendations on changes in monitoring or management of habitat based on the fully transparent monitoring data. The Habitat TAC will act on its own authority to make recommendations to the Advisory Committee. |
| 41  | Audubon California and Eastern Sierra Audubon Society | 7-3 Section 7.1.3 Concern: There is currently no permitted public access to Owens Lake except by guided tour.<br>Proposal: Full access should be permitted as soon as possible with proper safety and cultural/environmental safeguards with the ability of DWP to close roads for safety, bird nesting, construction, etc as necessary. All current hunting and wildlife viewing should likewise be recognized.  | Comment noted. The Planning Committee identified development of an Owens Lake Interpretive/Education Plan for planning and implementation of enhancements to existing public access areas.   |
| 42  | Audubon California and Eastern Sierra Audubon Society | 7-4 Line 4 Add: Owens Lake Important Bird Area  | Incorporated.  |
| 43  | Audubon California and Eastern Sierra Audubon Society | 7-26 Line 4 Add: Owens Lake Important Bird Area   | Andrea Jones confirmed via email to Andrea Schmid on March 27, 2012, that this comment was an error.   |
| 44  | Audubon California and Eastern Sierra Audubon Society | 7-26 Lines 4-6 Concern: (1) Grazing has no direct connection to habitat, and (2) projects should not be permitted in areas where there is a high level of existing or potential habitat.<br>Proposal: Delete lines 5-6.   | Text has been revised for clarity to state: "Projects should avoid areas where there is a high level of existing or potential habitat. <u>In marginal habitat areas, projects should consider the opportunity for grazing as a compatible land use.</u> "  |
| 45  | Audubon California and Eastern Sierra Audubon Society | 7-27 Lines 12 & 13 Change: "should" to "will"   | Comment not incorporated. The suggested edit is not appropriate for the Final Report. The Final Report is a report on Owens Lake Master Planning Collaboration and it is not a "Master Plan." Accordingly, the stronger language is not appropriate.   |
| 46  | Audubon California and Eastern Sierra Audubon Society | 8 n/a Concern: Implementation provisions are not clear as to role in the planning process of the TACs and the Advisory Committee.<br>Proposal: Per the additional specific comments below. Clarify the role of the TACs and the Advisory Committee in the review of each plan, including selection of appropriate TAC and timing and degree of involvement in planning process. Include a flowchart clarifying the plan review procedure.                       | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. However, it is important to note that an Advisory Committee will be established for the Master Project.   |

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| 47  | Audubon California and Eastern Sierra Audubon Society | 8-2 Lines 21-22 Concern: Has every PC member organization agreed to be on the future?<br>Proposal: Please clarify if there is agreement from all members.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. However, it is important to note that an Advisory Committee will be established for the Master Project.  |
| 48  | Audubon California and Eastern Sierra Audubon Society | 8-3 Lines 1-3 Delete: “, if required by leases and permits”   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 49  | Audubon California and Eastern Sierra Audubon Society | 8-3 Section 8.1.3 Concern: Master Plan does not address how subcommittee is selected.<br>Proposal: At the end of the first sentence on line 19, include the following “, which subcommittee shall be appointed by majority vote of the Advisory Committee”  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. However, it is important to note that an Advisory Committee will be established for the Master Project.  |
| 50  | Audubon California and Eastern Sierra Audubon Society | 8-4 Section 8.1.4 Concern: Role/authority of TACs in review/approval process is not clear.<br>Proposal:<br>· Add the following language to line 19: “Other TACs may form as needed through implementation. The determination as to the formation of additional TACs shall be made by the Advisory Committee by majority vote.”<br>· Delete “as appropriate” from the end of the sentence starting on line 23.<br>· Include cross reference to flowchart clarifying at what point during the review and planning process the TACs will be provided with information and will provide input and feedback. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. However, it is important to note that an Advisory Committee will be established for the Master Project.  |
| 51  | Audubon California and Eastern Sierra Audubon Society | 8-5 Section 8.1.5 Concern: Master Plan does not address how ex-officio members of Planning/Advisory Committee will be selected.<br>Proposal: Planning Committee should discuss who those ex-officio members (with consideration of current members under the MP) are and perhaps that they are agreed to on a rolling basis.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. However, it is important to note that an Advisory Committee will be established for the Master Project.  |
| 52  | Audubon California and Eastern Sierra Audubon Society | 8-5 Section 8.2.1 Proposal: Insert cross reference to flowchart.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 53  | Audubon California and Eastern Sierra Audubon Society | 8-5 Line 26 Concern: Master Plan does not address how the “appropriate TAC” is determined.<br>Proposal: After the words “appropriate TAC” appearing in line 26, include the following “(as determined by majority vote of the Advisory Committee; provided that in all cases, the Habitat TAC shall be deemed an “appropriate TAC” for purposes hereof)”  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. However, it is important to note that an Advisory Committee will be established for the Master Project.  |
| 54  | Audubon California and Eastern Sierra Audubon Society | 8-6 Section 8.2.2 Concern: Adaptive Management provisions are not clear as to when they apply and to what degree they could result in a net reduction of value acres.<br>Proposal: Include statement that Adaptive Management review remains subject to compliance with habitat suitability model, goals and objectives including no net reduction of value acres. Adaptive management diagram should be modified to be more specific to the OLMP rather than generic.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment for the former Implementation Section. Regarding the adaptive management diagram, we recommend the Habitat TAC consider this comment at a later time. |

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| 55  | Audubon California and Eastern Sierra Audubon Society                  | 8-9 Table 8-1 Concern: Species suits may change in composition and/or presence as a consequence of climate change; need to address remedial action in plan.<br>Proposal: This topic needs addressing as an agenda item within the Habitat Advisory Committee and would also benefit from outside expert review using predictive models that have been developed. Does not need to be decided for the plan but should be worked on in the next 1-2 years.   | Comment noted. This topic may be discussed with the Habitat TAC at a later time.  |
| 56  | Audubon California and Eastern Sierra Audubon Society                  | Appendix A. n/a Concern: Not clear that Appendix A is a reference to the work done to date and not a Committee Charter to be adopted.<br>Proposal: Add statement that the Committee Charter in Appendix A will not be applicable once the Master Plan is enacted.  | Incorporated. A statement has been added in Section 1.3.1, Planning Committee, to clarify that the charter was only applicable during the planning process.   |
| 57  | Big Pine Paiute Tribe of the Owens Valley (letter dated: May 11, 2011) | The Tribe is writing to object to the Water Conservation element of the Owens Lakebed Plan. The Tribe does not agree that minimizing water deliveries to Owens Lake needs to be an objective or goal of the Plan. Until about the 1920s, Owens Lake was a lake, and the Tribe would welcome a time when it is once again a lake. To the Tribe, a definition of "water conservation" does not include keeping water out of a lake so that the water is available for export to a distant urban area.  | Comment noted. This topic was addressed in a letter from the Planning Committee to the Tribe on June 20, 2011. As noted in the letter, water savings is a goal that the Planning Committee identified and accepted within the context of habitat enhancement. |
| 58  | Big Pine Paiute Tribe of the Owens Valley (letter dated: May 11, 2011) | To the extent the Owens Lakebed plan has been publicly communicated, the Tribe accepts the elements of protection of cultural resources, habitat conservation, and dust control. Planning for Owens Lake should embrace measures that retain or restore wetlands and a clean, healthy environment in Owens Valley.   | Comment noted.  |
| 59  | CA SLC   | 1-1, 16: The introduction of the document clearly states that the Plan does not propose projects for implementation at Owens Lake. However, this statement appears to conflict with other sections of the plan (pages 2-6, 4-18, 6-30, 7-5, 8-1, etc.) in which activities are proposed for implementation. As discussed in the accompanying letter, more practical value from the Plan and associated CEQA analysis would result if the Plan includes project level information. Without this information, the Plan would be analyzed at a program level under the California Environmental Quality Act (CEQA). Additional CEQA review would likely be required later to implement specific projects. | At the July 25, 2013, Planning Committee Meeting, the Planning Committee agreed to finalize the collaboration of the master planning process without additional detail. The comment is no longer applicable.  |
| 60  | CA SLC   | 1-4, 7-11: The last three sentences of this paragraph starting with "Prior to implementation ..." pertain to the next section on Public Trust values and resources. Please delete them here and revise the Public Trust section as shown below.  | Incorporated.   |
| 61  | CA SLC   | 1-4, 28: Please insert the following after line 28:<br>"The Commission has the discretion to determine whether dust control projects are consistent with Public Trust values and resources. To date, the Commission has authorized Shallow Flood, Managed Vegetation, and Gravel Cover dust control projects on the lakebed. The Commission evaluated each project on a case-by-case basis to determine if the project, as a whole, was either consistent with the Public Trust or not inconsistent with the Public Trust."  | Incorporated.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 62  | CA SLC    | <p>1-4, 29-33: Please replace the existing paragraph with the following:<br/>"In addition to the identified Public Trust resources, there are other activities and resources on the lakebed that are generally consistent with the Public Trust or not inconsistent with the Public Trust. These include mining, grazing, and protection of cultural resources."</p> <p>When the CSLC considers the Plan for approval, the more comprehensive the Plan is regarding future changes on the lakebed (including maintenance, new activities, and new projects) the greater the possibility that impacts would be considered offset by commitments in the Plan to provide for habitat or other enhancements on the lakebed. CSLC approval of the Plan and the specific projects it includes would provide assurance to project proponents that Public Trust considerations are satisfied. For projects that are not included in the Plan, for example a new or modified dust control project, no assurance can be given that a particular dust control measure previously authorized by the Commission would be authorized in the future on other areas of the lakebed. CSLC staff believes it may be more difficult to satisfy Public Trust concerns for smaller projects without providing specific offsets or mitigation.</p> | Incorporated.  |
| 63  | CA SLC    | 1-5, 22-23: It would be helpful to define acreage of the land ownership values, in addition to percentages.  | Incorporated. Figure 1-3 was revised to include the acreages associated with each land owner.  |
| 64  | CA SLC    | 1-5, 29: Replace the word 'Most' at the start of the sentence with 'Much' and the word 'are' with 'is.'  | Incorporated. The text was revised to provide clarity. Revised text states: " <u>Approximately 40 square miles are leased by the City of Los Angeles for the dust control project.</u> "   |
| 65  | CA SLC    | 1-5, 31-33: It would be helpful to describe the location and size (acres) of the Cartago property. Please add clarification that this property is owned by the CDFG.   | Incorporated. Figure 1-3 was revised to include the acreages associated with each land owner, including the Cartago property.  |
| 66  | CA SLC    | 1-6, Figure 1-3: The large rectangular area east of and outside of the lakebed (lower right side of the map) is shown as being owned by the CSLC. It is not.   | Incorporated. Figure 1-3 was revised to include only the area within the planning area.  |
| 67  | CA SLC    | 1-7, 10: Revise the start of the sentence to read "In March 2010, LADWP, as one way to comply with a Commission lease provision, initiated a broad collaborative process ..."  | Incorporated.  |
| 68  | CA SLC    | 2-1, 35: At the end of the last sentence, please add a comma after "District" and add the following: "and approval by the Commission. A lease from the Commission is required prior to placement of BACM on those portions of the lakebed under the jurisdiction of the Commission. Implementation of new and modified BACM not proposed in the Master Plan and analyzed in the accompanying environmental document would require additional CEQA review."   | The following statement was incorporated: "A lease from the Commission is also required prior to placement of BACM on those portions of the lake bed under the jurisdiction of the Commission." Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report.   |
| 69  | CA SLC    | 2-2: The description of the HSM should be clarified to more clearly define how the "objective" of maintaining "baseline" would be implemented and enforced.  | A detailed description of how the HSM will be implemented is included in Section 3.0, Habitat. A reference to this section has been added to the summary provided in the introductory material. The Planning Committee did not reach consensus regarding "enforcement" of the HSM, therefore this topic was omitted from the Final Report.   |
| 70  | CA SLC    | 2-2, 17: The Plan does not state what is meant by "baseline" when it discusses value-acres, yet this appears to be a very important part of the Plan and is mentioned throughout as the measure of performance. Please clarify what is meant by "baseline." For CEQA purposes, the baseline is normally established as the time when the notice of preparation is published.   | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report. Baseline habitat values were developed with the HSM to provide the basis for conservation and management. The baseline values were based on surveys completed in May and November 2010. The sentence was revised to state " <u>2010</u> baseline..." For additional detail, please refer to Section 3.3, Baseline Habitat Value-Acres for Landscape-Scale Management. |
| 71  | CA SLC    | 2-2, 21: "water conservation target of 50 percent...should be feasible..." Please clarify whether this is meant as a concept or a specific commitment. Please provide additional discussion of how the target was established and substantiating information on how feasibility was determined. Please explain in detail in Appendix E, Water Demand Analysis, or elsewhere in the Plan.   | The Habitat Working Group met to discuss the water target on September 10 and October 22, 2012. Agreement on the target was reached at the October 30, 2012, Agency Forum, and the January 28, 2013, Planning Committee meetings. This target reflects the consensus of the Planning Committee. The section and appendix have been augmented to describe how the target was established and feasibility was determined.  |



**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 72  | CA SLC    | 2-2, 22-23: When the process of approval of new or modified BACM is described, the required CEQA review process should also be documented. In addition, the role of the CSLC should consistently be described in the summaries of the BACM approval process. A lease from the CSLC is necessary to implement new or modified BACM. | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report. The sentence was revised to state: The feasibility of the target depends primarily on the approval of new or modified BACM <u>by the District and issuance of required land leases from the Commission.</u>   |
| 73  | CA SLC    | 2-2, 27: The transitioning has not been authorized by the CSLC, so please revise the sentence to read "LADWP proposes transitioning ..."   | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report. The sentence was revised to state: "In order to meet the water demand for the new dust control area, LADWP <u>proposes</u> transitioning..."  |
| 74  | CA SLC    | 2-2, 31-32: Please note that Phase 7a is undergoing separate CEQA evaluation.  | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report. The sentence was revised to state: "This project is currently <u>undergoing design and environmental review</u> ..."  |
| 75  | CA SLC    | 2-3, 9: Please clarify the entities providing funding and staff whenever this is mentioned in the Plan.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The Planning Committee did not reach consensus on funding; therefore, this topic was omitted from the Final Report. This specific reference to funding refers to all entities involved in achieving the Planning Committee's goals. To provide clarity, the text has been revised to state: "Allocation of resources, including funding and staff, <u>to achieve the four steps outlined above.</u> " |
| 76  | CA SLC    | 2-4; 7-17 -- 32-35; 11-16 CSLC staff is generally supportive of establishing a common methodology for evaluation of visual resources; however, staff would like to explore alternatives to the BLM Visual Resource Management Program assessment methodology.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The Open Space and Scenic Amenities section of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 77  | CA SLC    | 2-4, 35-36: It is unclear why the visual assessment methodology would not apply to operations and maintenance activities.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The Open Space and Scenic Amenities section of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 78  | CA SLC    | 2-5; 7-18 -- 1-3; 9-10 Cultural resources are not generally included under the Public Trust doctrine; please delete "although cultural resources are not considered a Public Trust resource by the Commission." Similar comment for second page reference.   | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report.   |
| 79  | CA SLC    | 2-5, 8: The Owens Lake Interpretive Plan will be considered a project under CEQA and will require CEQA assessment before its adoption and subsequent implementation by any public agency.  | Comment noted.   |
| 80  | CA SLC    | 2-5, 23 and 30: Public Trust: revise characterizations of grazing and mining as "considered by the Commission as generally consistent or not inconsistent ...".  | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report.   |
| 81  | CA SLC    | 2-5, 13-15: The consistency of renewable energy projects at Owens Lake with the Public Trust has never been considered by the CSLC. Please delete this sentence.   | The text was revised as follows, consistent with the suggested language provided by CSLC comment on page 7-24: " <u>The Commission has not yet made a determination as to whether renewable energy projects at Owens Lake are consistent with the Public Trust. However, it may be recognized as consistent with the Public Trust in the future.</u> "   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response   |
|-----|-----------|--|---|
| 82  | CA SLC    | 2-6: Implementation: CSLC staff recommends that Implementation procedures and details for the Master Plan be included in an MOA or interagency agreement and be removed from the Plan.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.                |
| 83  | CA SLC    | 2-8, 2-3: The statement that the Master Plan does not propose specific projects for implementation conflicts with other sections of the Plan that discuss implementation.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.                |
| 84  | CA SLC    | 2-8, 9-10: To the extent that proposed projects are not included in the Plan and covered by the accompanying CEQA analysis, additional CEQA review may be required.  | Comment noted.  |
| 85  | CA SLC    | 2-8, 9-14: What would be the enforcement mechanism for funding OLMP-specific monitoring and review (and pro-rated funding of the MP Coordinator)?  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.                |
| 86  | CA SLC    | 3-10, 16: CSLC staff suggests rephrasing "Baseline observations" to avoid confusion with the baseline under CEQA.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 87  | CA SLC    | 4-5, 1: Please substitute "Description of" for "Approved" in the Heading for 4.2.1.  | Incorporated.   |
| 88  | CA SLC    | 4-6, 2-5: Please provide a copy of the 1998 Memorandum of Agreement in the Appendix or summarize it in the Plan.   | The reference to the 1998 MOA was removed from this sentence to avoid confusion. The sentence was revised to state: "As a condition of LADWP's leases from the Commission, gravel used for dust control on Owens Lake bed must be comparable in coloration to the lake bed soils."  |
| 89  | CA SLC    | 4-6, 12: Please provide a copy of the 2006 Settlement Agreement in the Appendix or summarize it in the Plan.   | Comment noted. The Final Report does not include appendices to support the regulatory context of dust control. A citation for the 2006 Settlement Agreement was added to the references section.  |
| 90  | CA SLC    | 4-9 and 4-14, 1-17 and 3: It would be helpful to clarify that CEQA review of new and modified dust control methods would need to occur.  | Incorporated. The text was revised to state: "All potential methods would need to conform to regulatory requirements (i.e., dust control effectiveness, BACM approval, <u>environmental review</u> , permits and leasing) and be constructible and operable for an acceptable cost."  |
| 91  | CA SLC    | 4-10, 1: This title is confusing. Aren't these modified BACMs, rather than existing? Deleting "Existing and" would remedy the confusion.   | Incorporated.   |
| 92  | CA SLC    | 4-13, 4-12: Solar is not a BACM in-and-of-itself. This is modified gravel. It would be more straightforward if this modified BACM was described under 4.4.1.3 on page 4-10 (this section could be expanded to cover the ways in which solar projects could use gravel). With this modification, Section 4.4.2.4 should be removed. | Solar panels can provide a level of dust control and would need to be evaluated as a potential new BACM; therefore, it is appropriate in the original location, as determined by the Dust Control Work Group after extensive facilitated work on this section.  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 93  | CA SLC    | 4-17, 25-26: CSLC staff is not certain that the Planning Committee agreed to support an SIP amendment.   | The Planning Committee agreed to revise the language regarding a SIP amendment at its Feb 2012 meeting. The new language from the Planning Committee states: "In other words, the SIP does not allow a violation of NAAQS during the transition period. LADWP may pursue a SIP amendment <u>for this purpose. Not all Planning Committee members supported amending the SIP. LADWP would seek an Advisory Committee's input and support on any proposed SIP amendments.</u> " (An Advisory Committee was envisioned during the master planning process; however it was not established. An Advisory Committee will be established for LADWP's Master Project.) |
| 94  | CA SLC    | 4-17, 31-36: The proposed transition schedule may be partially dependent on the CEQA review approach that is determined.   | Comment noted.   |
| 95  | CA SLC    | 4-18, 3-4: Is the 3 square miles of potential transitions referring to Phase 7a? Please clarify.   | The statement regarding three square miles of potential transitions is out of date and no longer applicable. The text was revised to state: "Potential transitions are limited by site-specific suitability (e.g., in some areas, Shallow Flood is the only suitable measure), maintenance of total baseline value-acres for the six target habitat guilds over time, and financial feasibility."  |
| 96  | CA SLC    | 4-18, 7-9: CSLC staff recommends that Implementation procedures and details for the Master Plan be included in an MOA or interagency agreement and be removed from the Plan. | The Final Report documents the consensus of the Planning Committee during the master planning process. The Planning Committee did not reach consensus on implementation, therefore this topic was omitted from the Final Report. Accordingly, it was not necessary to address this comment.  |
| 97  | CA SLC    | 4-19, 3-6: Please clarify that "existing dust control areas" only refers to areas owned by or under lease to LADWP (no CSLC-managed areas not under lease).                  | The text has been clarified to state: "Immediate response stabilization measures could be deployed quickly in <u>uncontrolled</u> dust source areas to control emissions and to prevent the areas from expanding. These proposed measures could be deployed <u>outside</u> existing dust control areas, <u>in areas owned by or under lease to LADWP.</u> "  |
| 98  | CA SLC    | 4-19, 7-15: The immediate response stabilization measures should be described in enough detail so that they can be analyzed under CEQA.                                      | At the July 25, 2013, Planning Committee Meeting, the Planning Committee agreed to finalize the collaboration of the master planning process without additional detail. The comment is no longer applicable.   |
| 99  | CA SLC    | 5-1, 9: Please clarify that the Los Angeles Aqueduct is a conveyance, not a source of water.   | Incorporated.  |
| 100 | CA SLC    | 5-4 Section 5.1.4 does not relate to Owens Lake and could be omitted or shortened.   | Not incorporated. The Planning Committee agreed at the February 2012 meeting to include the water supply text as a part of the document because it frames the importance of water savings and efficiency at Owens Lake.  |
| 101 | CA SLC    | 5-6, 7-9: Please include a table showing actual annual water usage on Owens Lake for dust control.   | Comment noted. This comment is in reference to providing context for the stated water savings target of 50 percent of the annual water budget. Section 4.0, Water Supply, Savings, and Efficiency, has been updated with new text to summarize two technical appendices that outline the determination of the water savings target and its feasibility. As noted in the section and appendices, the water savings target is no longer related to an annual water budget. It is based on the "through Phase 7" average annual water demand.   |
| 102 | CA SLC    | 5-6, 14-18: Please provide more detail on the water demand analysis presented in Appendix E.   | Section 4.0, Water Supply, Savings, and Efficiency, has been updated with new text to summarize two technical appendices that outline the determination of the water savings target and its feasibility.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response   |
|-----|-----------|---|---|
| 103 | CA SLC    | 5-7, 3-5: This listing of actions necessary to meet the water conservation target should be amended to include a description of the CEQA review process anticipated for new or modified BACMs.  | Incorporated. The bullet was revised to state: " <u>Completion of necessary environmental review and issuance of appropriate leases and environmental permits for new BACM.</u> "   |
| 104 | CA SLC    | 5-7, 22-27: Any proposed groundwater use project would require CEQA evaluation. This should be noted.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 105 | CA SLC    | 5-7 and 5-8, 26 and 9: CSLC staff would like to be involved in developing or reviewing these criteria.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 107 | CA SLC    | 6-1, 6-3: The definition or concept of "baseline habitat values" needs to be made clearer. Is it the results of the 2011 model run? If so, on what measurement or observation was that made? Does it mean based on the current management of the cells under dust control and the parameters/measurements/observations associated with that? Is it the numbers for each guild listed on p. 6-23 at the end of Table 6-8? Please clarify by adding a clear and concise description or definition in Section 6.0  | Baseline habitat values are the numbers listed for each guild in Table 3-8 (formerly Table 6-8). The text has been clarified as follows: "The HSM will be used to assess, plan, and manage existing areas and new projects in order to maintain <u>2010</u> baseline habitat value over time for the target guilds. <u>The habitat values were established based on May and November 2010 surveys. Baseline habitat value acres are provided in Section 3.3, Baseline Habitat Value Acres for Landscape-Scale Management. Appendix C, Habitat Suitability Models, details the models for each species guild, including habitat parameters used to measure habitat suitability.</u> "  |
| 108 | CA SLC    | 6-3, 2-8: Isn't the HSM also intended as a tool to measure whether or not the baseline value-acres are being "maintained"? In other words, isn't it part of ensuring success of Plan implementation? This component should be added to the list of how the HSM will be used, perhaps by revising number 1 on the list to read "...track habitat value over time to ensure value-acres are maintained for each guild..."   | The text has been revised to state: "The HSM will be used during implementation of projects on the lake bed: 1) to <u>track habitat value over time to ensure habitat values are maintained for each guild</u> ; 2) to predict habitat value when planning projects on the lake; and 3) to improve understanding of habitat parameters in the adaptive management process."   |
| 109 | CA SLC    | Section 6.3: This section describes the process by which each cell was assigned a "value-acre" and includes the cell by cell total for each guild in Table 6-8. The section then also provides figures that display "suitability" along a scale of "marginal" to "optimal" (not including no value). However, the section and the information it provides is not well connected or "contextualized" into the subsequent discussion of management for habitat maintenance. Suggest revising the introductory remarks on page 6-19 to describe how the raw values and relative suitability will feed in to management decisions. Alternatively, consider re-ordering chapter 6 so that the "how will this be used to achieve the objective" discussion (currently section 6.4) comes ahead of the more technical presentations. | The sequence of the Habitat Section was reviewed extensively for clarity by the Habitat Working Group. Rather than reorder the section, the text has been revised to include how the baseline habitat values will be used. The text has been revised as follows: " <u>Table 3.8 gives the average habitat value-acres (averaged from May and November 2010) for each target guild within each defined cell and unit. Table 3.8 provides the baseline habitat value acres to be used for management.</u> The seasonal variability of total habitat value-acres for each guild is the absolute difference between habitat value in May and November, expressed as a percent (see Table 3.8). <u>As projects within the planning area are developed, habitat values for each affected cell or unit will be evaluated such that total habitat value-acres are maintained for each guild compared to the established baseline values presented in Table 3-8.</u> " |
| 110 | CA SLC    | Section 6.4: This section would benefit from a simplified table showing each of the guilds and their associated "baseline" (starting point?) value-acres. These values are somewhat lost at the end of Table 6-8 and should instead be highlighted in 6.4 (or even earlier in the chapter) as a way of providing context for the discussion of how habitat will be managed/maintained over time.  | The table has been reformatted to provide clarity; specifically, the summary information was moved to the top of the table.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response  |
|-----|-----------|---|--|
| 111 | CA SLC    | 6-30, 2-11: The objective is described as “maintain” baseline value-acres over the Plan area as a whole, for each guild. However, the mechanism for achieving and enforcing this is lacking. Additionally, a minimum acreage size should be identified to prevent a cell from being transitioned in a way that has, on paper, a high value-acres number, but only a very small physical acreage of actual habitat (i.e. a tiny acreage of very good habitat and then zero value, like gravel, over the rest of the cell could still result in a decent value-acre number, but functionally, it would not be good). This suggestion is consistent with CSLC staff’s prior comments on the HSM and its practical application as a management tool and would protect against the “golden acre” concept. There should also be a mechanism to ensure that the opposite is prevented (i.e. high suitability areas are eliminated but the value-acres are technically “maintained” by having a larger number of marginal acres). As currently contemplated, the “value-acres” concept is supportable, but only to a point. Additional practical parameters are necessary to prevent abuses of the calculation methodology. | <p>The methods for achieving maintenance of baseline habitat value are described in the remainder of this section (3.4, Managing Habitat Value-Acres Over Time) as well as Section 3.5, Habitat Monitoring, and Section 3.6, Adaptive Management. The comment regarding the mechanism for enforcement is no longer applicable to this document because it is no longer a master plan, which assumed a structured implementation, including a CSLC lease and environmental permits.</p> <p>Regarding the golden-acre concept, during development of the HSM and the habitat value-acres, the Habitat Working Group found that focused improvement in a subset of future habitat areas within DCM units does not reduce the habitat value for a guild, in part because the size of a management unit is an important component in the habitat modeling. As an example, the subsequent development of the "fuzzy map," which was approved by the Planning Committee, demonstrates two bookend scenarios for potential change on the lake bed with focused habitat improvement (maintaining habitat value acres) with a reduction in approximately 50% of water used for dust control. While current Shallow Flood Lateral and Pond acreage will be reduced in these future scenarios, over 21.5 square miles of this type of dust control will be enhanced to benefit all guilds. Please see the summary of habitat in Tables 3 and 4 in Appendix G, Feasibility Study (i.e., development of the "fuzzy maps"). It should be noted that current habitat value within the dust control project is the result of management for dust control solely, with no management for habitat values. Adaptive management of the habitat areas is a part of the future scenarios.</p> |
| 112 | CA SLC    | 6-31, 5 and 10-11: What is “the dust control project”? This reference is confusing and should be clarified. Does it mean within areas that are currently managed by LADWP for dust control? Future projects included? What about transitioning? (see also p. 6-32)  | The dust control project is defined as Phases 1 through 8. A definition was added at the end of Section 1.3.3, Collaborative Result.   |
| 113 | CA SLC    | Section 6.4.3.1: It is unclear if the Plan is contemplating “manag[ing] habitat” while using less water to control dust (line 12) on areas that are currently under lease with the CSLC and whether the intent is that changes to the current allowable/described activities (dust control methods) be “approved” for implementation by virtue of Plan approval. It should be noted that the in order to implement the “tools” described on areas that are subject to lease conditions, a lease amendment and possibly additional CEQA review could be necessary. A Plan-wide lease and additional detail for CEQA analysis would provide the streamlining benefits this section appears to be seeking.   | Comment noted. The document is no longer a Master Plan. It is a report on the collaboration of the Planning Committee for consideration in future management of Owens Lake. This comment is no longer applicable. However, it is important to note that environmental review, permitting, and leasing associated with projects on the lake bed will be considered when such projects are proposed.   |
| 114 | CA SLC    | Section 6.4.3.2: This section should be revised to provide additional clarity and detail on the intended use of the “balance sheet.” Will a deficit be allowed only within a given future “project area” as that specific project is implemented, or could there be a deficit across time and between separate individual future projects? The section should provide a specific maximum deficit allowed (5%? 10%?) and should identify success criteria, enforcement, and remedial measures to provide assurances that the habitat value-acres objectives are met.   | The Habitat TAC did not identify a specific maximum deficit. We recommend this topic be considered by the Habitat TAC at a later time.   |
| 115 | CA SLC    | 6-30, 16-17: If the model is revised, CSLC would like the opportunity to review the revisions.  | Comment noted.   |
| 116 | CA SLC    | 6-30, 33-34: A change in management of the lake could constitute a project under CEQA.  | Comment noted.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response  |
|-----|-----------|---|--|
| 117 | CA SLC    | 6-32, 8-11: Please provide more details of how the balance sheet will work...for how long could the balance sheet run a deficit before the difference has to be made up with improvements elsewhere on the lake? Is there a maximum deficit that can be run at any given time? What happens if a cell's value-acres deteriorate "naturally"?  | The Habitat TAC did not identify a maximum duration for a deficit of value-acres. In terms of operations and maintenance or transition of DCMs, Section 3.4.3.2 defines a timeline for habitat establishment. During the time of establishment, cells are not considered in the HSM. Habitat re-establishment depends on the project and/or operations and maintenance. For example, managed vegetation takes longer to establish than shallow flood. In terms of "natural deterioration," dust control areas are highly managed and any deterioration of value will be identified and corrected, per the monitoring and adaptive management process. If "natural deterioration" occurs outside of dust control areas, then it may be considered by the Habitat TAC and through the adaptive management process. |
| 118 | CA SLC    | 6-39, 11: Item #3 (adjusting management actions) could trigger CEQA review.   | Comment noted.   |
| 119 | CA SLC    | 7-5, 25-37: With some minor revision, the scenic loop and interpretive projects could be described in enough detail to conduct project-level CEQA review.   | At the July 25, 2013, Planning Committee Meeting, the Planning Committee agreed to finalize the collaboration of the master planning process without additional detail. The comment is no longer applicable.   |
| 120 | CA SLC    | 7-8: Table 7-1 This table should indicate when CEQA review for the Owens Lake Interpretive Plan will occur.   | Incorporated. The following text was added to the table under Phase 1: " <u>Complete environmental review, permitting, and leasing, as applicable, for the Owens Lake Interpretive Plan.</u> "   |
| 121 | CA SLC    | 7-24, 24-25: Reword the first sentence of this paragraph to read "The Commission has not yet made a determination as to whether renewable energy projects at Owens lake are consistent with the Public Trust."  | Incorporated.  |
| 122 | CA SLC    | 7-25, 22: Replace "will" with "could" since a solar project has not yet been approved.  | Incorporated. Text was revised to state: "The project <u>is planned within</u> the Phase 8 dust mitigation project area..."  |
| 123 | CA SLC    | 7-26, 5-6: The sentence does not make sense. Please clarify why grazing would be considered for an area with a high level of habitat?   | Text has been revised for clarity to state: "Projects should avoid areas where there is a high level of existing or potential habitat. <u>In marginal habitat areas, projects should consider the opportunity for grazing as a compatible land use.</u> "  |
| 124 | CA SLC    | 7-26; 4-6, 23-24 This section seems to identify habitat and visual impacts as the only potential environmental issues to be evaluated when a renewable energy project is being considered. This section should be more explicit about the requirements for adherence to CEQA and the requirements that proposed projects be evaluated for their full-range of potential environmental issues. | A statement was added to the preceding paragraph as follows: " <u>All projects would be subject to applicable environmental review, permitting, and leasing.</u> "   |
| 125 | CA SLC    | 7-26, 29: Monitoring could be required through the CEQA evaluation process.   | The Planning Committee did not reach consensus on implementation, including monitoring; therefore, these topics were removed from the document. The comment is no longer applicable.   |
| 126 | CA SLC    | 7-28, 7: The statement that there is no monitoring associated with mining is too definitive. Monitoring may be required as part of the environmental evaluation and/or permitting process.  | The Planning Committee did not reach consensus on implementation, including monitoring; therefore, these topics were removed from the document. The comment is no longer applicable.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                       | Comment   | Status/Response  |
|-----|---------------------------------|---|--|
| 127 | CA SLC                          | <p>8-1 - Implementation: CSLC staff recommends that Implementation procedures and details for the Master Plan be included in an MOA or interagency agreement and be removed from the Plan. The Implementation section is mostly procedural and is better suited for inclusion in an MOA. The Plan and MOA would be reviewed together under CEQA before being considered for approval by governmental entities. The current section could be replaced with the following:</p> <p>“It is anticipated that the governmental agencies involved in development of the Master Plan will sign a Memorandum of Agreement (MOA) that will provide for Master Plan implementation. The MOA will include roles and responsibilities and procedures for implementation. The MOA will be structured to encourage an open, collaborative, and cooperative process among all entities responsible for implementation.</p>  | <p>The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.</p>  |
| 128 | CA SLC                          | <p>8-7, 29: This sentence references a “decision-making rule” in the MOA. Should “rule” be “role”?</p>  | <p>The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.</p>  |
| 129 | CA SLC                          | <p>8-7, 33: How would the Agency Forum arrive at a final decision? By vote? What if the decision is counter to the policies of one of the Agency Forum members? The details of how these issues would be resolved are better suited for inclusion in an MOA.</p>  | <p>The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.</p>  |
| 130 | CA SLC                          | <p>8-9, 9: How would the project fees be determined and levied? By whom? This may require legislation and new regulations if done by an agency.</p>   | <p>The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.</p>  |
| 131 | California Native Plant Society | <p>p. 1-9, lines 1-2: This is the first use of the term “water conservation” in the Draft Master Plan. The Board feels that the phrase “water conservation” is inherently ambiguous. The Board proposes either eliminating the phrase from the Master Plan or providing a clear definition and applying it consistently throughout the document. In the Draft Master Plan, “water conservation” appears to have at least two meanings: (1) using water efficiently on the lake bed, and (2) avoiding or minimizing water use on the lake bed. The Board is not opposed to efficient use of water on the lake bed, but several board members do think the Master Plan should not set a policy of permanently reduced water usage or even set a target amount of water usage on the lake bed. Water should be available to control dust and for use to meet the habitat and other goals. Because the Master Plan strives to be flexible and adapt to future conditions, it would be restrictive for the Master Plan to place limits on water use.</p> | <p>The term "water conservation" was replaced with "water savings and efficiency" throughout the document (consistent with the Planning Committee recommendation at the February 15, 2012, meeting).</p> <p>At its February 2012 meeting, the Planning Committee clarified its terminology and agreed to the term "water efficiency" with a definition of producing more dust control and habitat value per acre-foot of water. Water Conservation was discussed as using less aqueduct water on Owens Lake.</p> |
| 132 | California Native Plant Society | <p>p. 5-1 to 5-6 (Section 5-1): The Board believes that Section 5.1 is unnecessary and should be removed.</p>   | <p>Not incorporated. The Planning Committee agreed at the February 2012 meeting to include the water supply text as a part of the document because it frames the importance of water savings and efficiency at Owens Lake.</p>   |
| 133 | California Native Plant Society | <p>p. 5-6, lines 12-13: If the phrase “beneficial use” is to be used in the Master Plan, the Board requests a definition of this phrase.</p>  | <p>Incorporated. The text has been updated to state: "...available for other beneficial uses, <u>as defined by law and as subject to water rights.</u>"</p>  |
| 134 | California Native Plant Society | <p>p. 5-7, lines 21-22: The Board recommends clarification of this sentence by changing “would be subject to” to “would be contingent upon.”</p>  | <p>The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.</p>  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                       | Comment   | Status/Response   |
|-----|---------------------------------|---|---|
| 135 | California Native Plant Society | p. 5-7, after line 27: The Bristlecone Chapter has a long history of promoting sustainable groundwater pumping throughout Owens Valley, but has had little success in effecting better groundwater management. Owens Lake is part of the Owens Valley hydrological system. Because of this, board members feel that a fourth condition should be added to this list: 4) The U. S. Geological Survey determined that groundwater pumping in excess of approximately 75,000 AFY in the Owens Valley will result in "significant changes in water-table altitude and evapotranspiration" (Danskin, 1998, p. 139). Groundwater pumping near or on Owens Lake bed will not be allowed until long-term Owens Valley groundwater pumping from 1986 onward averages 75,000 AFY or less. Once this goal is attained, any groundwater pumped near or on the Owens Lake bed should be counted toward the 75,000 AFY ceiling, provided that such pumping does not result in significant degradation to wetland habitats on the lake bed.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 136 | California Native Plant Society | Reference to be added:<br><br>Danskin, W. R. 1998. Evaluation of the hydrologic system and selected water-management alternatives in the Owens Valley, California. U. S. Geological Survey Water-supply Paper 2370-H  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 137 | CDFW                            | Page 1-5, Lines 25-33. The Final Master Plan (FMP) would be more inclusive if specific land ownership acreage was specified for all landowners and lessees; Replace phrases like "Most of the remaining lakebed" and "Part of this land" with numerical values. It would also be helpful to identify who holds the agriculture leases, what they are they growing/grazing, and on how much land within the Planning Area.   | Incorporated. The land ownership figure (Figure 1-3) was revised for clarity, including acreages associated with each landowner. Grazing is described in Section 5.4, Grazing.  |
| 138 | CDFW                            | Page 2-4, Line 4-8. Please be explicit regarding which items are recognized as Public trust, consistent with Public Trust and not yet recognized as consistent with the Public trust. This is addressed in other sections but adding the details upfront would provide clarity to this section.   | This sentence was deleted for clarification. The Public Trust characterization of each element was revised per CSLC comments. Characterizations are included in Section 1.1, Public Trust Values and Resources at Owens Lake, and in the respective summaries of each element (located in Section 1.3.3, Collaborative Result, of the Final Report).  |
| 139 | CDFW                            | Page 2-8, Table 2-1. Please provide explanations, as presented under the cultural resources section, as to why there will be no monitoring parameter associated with renewable energy and mining.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.                |
| 140 | CDFW                            | Section 3.4 Biological Resources – General section-wide recommendations:<br>The Department recommends that survey methods are described for all data collection of biological resources. This will allow CEQA to more adequately evaluate the comprehensiveness of baseline data. In general, the uncertainty of the assessment of these biological resources should be stated explicitly in the introductory paragraphs, and in each subsection, monitoring methods should be described. For example, there have been multiple lake-wide bird surveys. Bird diversity and numbers are relatively easy to determine during a lake-wide survey while invertebrates, mammals and herpetofauna estimates are likely much less comprehensive. The Department also recommends identifying the timeframe that surveys were conducted for evaluation of baseline data under CEQA. For this evaluation, it may be important to describe that multiple years of surveys have been conducted to identify species that may have had high between-year variation and may not have been captured by one year of surveys. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |



**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 141 | CDFW      | Section 3.4: The Department also recommends including an appendix of all species present on the lake organized by guild, conservation status, and any relevant categorical description (e.g. what is considered a wader vs. gull vs. shorebird) as well as a citation of the observation. Steve McLaughlin provides a good example of this in Appendix D.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.                            |
| 142 | CDFW      | Section 3.4: Citations should be included in this section as well as a concise description of how, where, and when 'studies' are identified and/or described. When possible, replace vague terms such as 'majority' and 'abundant' with actual percentages or numbers counted/estimated followed in parenthesis with an estimate of standard error and the number of observations being averaged to calculate the mean. This would be a much more clear and informative presentation of lake resources.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.                            |
| 143 | CDFW      | Section 3.4: Please include the scientific name the first time species are mentioned. This seems to be most problematic with bird species but it should be consistent with all species throughout the document.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.                            |
| 144 | CDFW      | Page 3-11, Line 2. If no focused invertebrate surveys have been conducted, please identify if focused invertebrate surveys will be conducted in the future. Some invertebrate species are an important food base for wildlife and their abundance may guide the presence of many species on the lake bed. Page 3-11 describes invertebrates observed within Shallow Flood locations on the Owens Lake playa and that brine shrimp ( <i>Artemia</i> sp.) have colonized eight shallow flood dust control cells. They can occur in relatively large densities and because brine shrimp were not previously known to be present within the dust control project, they may warrant further discussion, monitoring and identification in the FMP because the presence of this species is an important resource to wildlife at Owens Lake.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.                            |
| 145 | CDFW      | Page 4-19 of the DMP describes "Immediate Response Stabilization Measures" under the Operations and Maintenance of existing Dust Control Projects. Line 7 identifies sand fence as one of these measures. Sand fencing is currently implemented only on cell T1A-1. Due to past concerns regarding visual obstructions and barriers to movement to western snowy plover with sand fence associated with the Owens Lake Dust Control Project Moat and Row, mitigation was required to offset potentially suitable snowy plover habitat loss in cell T1A-1. The Department is concerned that sand fences may have significant impacts to wildlife if implemented as an immediate response stabilization measure in other existing dust control cells. The protocol for implementation of such a measure (lines 14-20) includes notification to and approval from the Great Basin Unified Air Pollution Control District and the State Lands Commission. Because all the measures identified in lines 7-12 (sand fence, irrigation, gravel, brine, approved soil binders) require alteration to existing dust control on the playa, Department notification will also be required for permit amendments of existing Lake and Streambed Alteration Agreements. | The text has been revised to state: "1. LADWP notifies the Commission, the District, <u>and CDFW</u> about the emission, location, size, and stabilization approach from the approved list."   |
| 146 | CDFW      | Section 6, Habitat. In addition to the Habitat Suitability Model (HSM), species with conservation status (e.g. California Species of Special Concern (CSSC) or California Native Plant Society designation) may need to be addressed separately. In particular, immobile plant species of concern such as Parish's popcorn flower and Owens Valley checkerbloom may need to be assessed outside of the HSM process as they warrant protection that the HSM may not be able to provide.   | Comment noted. Additional text has been added to Section 3.0, Habitat, to state: " <u>The HSM is not meant to provide protection for species with conservation status, such as CA Species of Special Concern or CA Native Plant Society designations. Species with these designations may need to be addressed separately from the HSM; however, these species generally occur within natural meadows, seeps, and springs and not within the dust control project.</u> " |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response   |
|-----|-----------|---|---|
| 147 | CDFW      | Page 6-2, Table 6-1. The species rows should be more comprehensive and detailed. Species should either be listed here or referenced in an appendix that includes a master list of all identified species.   | As noted in the table, the species identified are Focal Breeding Species. A footnote has been added to refer the reader to Appendix C for a full list of species.   |
| 148 | CDFW      | Page 6-34, Table 6-1. Please describe why seasonal water availability will not be monitored during the summer. Please also describe why vegetation structure would be best monitored in spring, but richness best monitored in late summer/early fall.  | The timing for monitoring vegetation structure has been adjusted in Table 3-10 to reflect monitoring in summer/fall. Seasonal changes in water availability are monitored based on each guild's use as appropriate and as it relates to current operations. Seasonal water availability and monitoring are noted as topics for consideration by the Habitat TAC in order to maximize seasonal water availability with development of the Master Project.  |
| 149 | CDFW      | Page 6-35, Section 6.5.2 "Wildlife Monitoring for Validation," describes that validation of the HSM will be based on seven lake-wide bird counts conducted throughout the year for three years. The Department recommends that validation include measures for both abundance and diversity.  | The lake-wide bird counts will be completed consistent with previous methods, which include both abundance and diversity. The text was updated to note that validation surveys include both abundance and diversity. Revised text states: "These validation surveys ( <u>including abundance and diversity</u> ) will include two during spring migration, three during fall migration, one in winter, and the Western Snowy Plover breeding survey in late May, which is considered a survey for all breeding waterbirds." |
| 150 | CDFW      | The Department would also like to comment that HSM validation for the meadow guild may require an additional survey method to be able to monitor non-avian wildlife such as herpetofauna as well as small mammals, such as the Owens Valley vole and other less visible ground dwelling rodents.  | Comment noted. We recommend this topic be considered by the Habitat TAC at a later time.  |
| 151 | CDFW      | Page 8-1, Lines 9-10 states government agencies involved in the Master Plan will sign a Memorandum of Agreement (MOA) that will help provide implementation. The Department has recently become aware that all MOAs are potentially CEQA action items. As such, the Department may only have legal authority to sign an MOA if the CEQA process is implemented for the DMP. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 152 | CDFW      | Page 1-9, Lines 4. Please elaborate on the meaning for the DMP to be "sustainable" from a climate-change and water-use efficiency standpoint.   | The goals of the master planning process were established by the Planning Committee and are described in more detail in Appendix B, Vision Statement. As noted in the Vision Statement, sustainable is characterized as being flexible and robust enough to adapt to changing conditions and technology.  |
| 153 | CDFW      | Page 2-2, Line 24. Please add a citation for Phase 7a design process.   | Incorporated.   |
| 154 | CDFW      | Page 2-4, Line 12-14. It is unclear if educational opportunities are consistent with the public trust. Again, we recommend clarifying where each of the lake resources discussed in this section stand in regard to the Public Trust.   | The Public Trust characterization of each element was revised per CSLC comments. Characterizations are included in Section 1.1, Public Trust Values and Resources at Owens Lake, and in the respective summaries of each element (located in Section 1.3.3, Collaborative Result, of the Final Report).   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response   |
|-----|-----------|--|---|
| 155 | CDFW      | Page 3-9, Line 5. Please identify what kinds of surveys were conducted so that a reviewer can assess how comprehensive the surveys were.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 156 | CDFW      | Page 3-9, Line 9. In addition to diatoms and cyanobacteria, please identify if there is any evidence of biotic soil crusts.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 157 | CDFW      | Page 3-9, Lines 20-21. Please describe when and how these samples were collected how these surveys were conducted in terms of timing, sampling across habitat types, and conditions.     | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 158 | CDFW      | Page 3-9, Line 24-29. A citation should be added when describing the natural history of various tiger beetles.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 159 | CDFW      | Page 3-9, Line 33. Please identify the protocols used to survey for herpetofauna and how these surveys were conducted in terms of timing, sampling across habitat types, and conditions. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 160 | CDFW      | Page 3-10, Line 7. Please include the scientific names for Killdeer, Snow Plover and Horned Larks.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response   |
|-----|-----------|--|---|
| 161 | CDFW      | Page 3-10, Line 7-9. A citation should be added when describing the optimal breeding habitat of snowy plover.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 162 | CDFW      | Page 3-10, Line 16. Please provide information describing the methods used to derive baseline data on mammals.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 163 | CDFW      | Page 3-10, Line 17. If known, please include the genus and species of pocket mice and deer mice as this is the first time they are mentioned in the DMP. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 164 | CDFW      | Page 3-10, Line 18. Please describe specifically which medium and large mammals may be using the edge of the playa as a corridor.                        | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 165 | CDFW      | Page 3-11, Line 6. Please add a citation for the relationship between invertebrate abundance and diversity and salinity.                                 | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 166 | CDFW      | Page 3-11, Line 7-8. Please add a citation that quantifies the dominance of brine fly larvae and the quantification of invertebrate forage base.         | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response   |
|-----|-----------|---|---|
| 167 | CDFW      | Page 3-11, Line 16. Please elaborate how Tiger beetles have benefited from shallow flooding and include a citation.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 168 | CDFW      | Page 3-11, Line 16. Please support the statement that Wetsalts Tiger Beetles are the most abundant tiger beetle with a citation.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 169 | CDFW      | Page 3-11, Line 25. Herpetofauna is misspelled.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 170 | CDFW      | Page 3-11, Line 25. The Department recommends adding a table with all observed as well as likely herpetofauna and fish in the Owens Lake as well as their conservation status, a citation, and their guild association/s. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 171 | CDFW      | Page 3-11, Line 33-34. Please identify what methodology was conducted to determine there are no fish present.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 172 | CDFW      | Page 3-12, Line 5. When the data exists, it may be helpful to use specific percentages or numbers for clarity, rather than terms such as 'majority.'  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response   |
|-----|-----------|--|---|
| 173 | CDFW      | Page 3-12, Line 9. Please add a citation and more quantified details regarding how bird numbers and diversity has increased since flooding.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 174 | CDFW      | Page 3-12, Line 12. Please use scientific names the first time you mention the American Avocet and Snowy Plover. This should be checked for all species.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 175 | CDFW      | Page 3-12, Lines 29-33. Please describe how, where and when grebe diets were studied and include a citation.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 176 | CDFW      | Page 3-13, Line 16. Please add a citation for the comment that other rail species prefer more wetland vegetation.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 177 | CDFW      | Page 3-13, Lines 27-36. Please add citations to this section and provide more details on methods and results of Owens Lake specific studies.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 178 | CDFW      | Page 3-14, Line 13. Please identify the current estimate of Snowy Plover. Since this species is a CSSC, it may be beneficial to include a table with population estimates going back as long as data has been collected. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response   |
|-----|-----------|---|---|
| 179 | CDFW      | Page 3-14, Lines 23-36. Please add citations to this section. Studies referenced in the literature should include at a minimum when, where, and a study result. We also recommend including some methodology if similar studies are particularly relevant and will be cited multiple times. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 180 | CDFW      | Page 3-15, Line 11. Please describe which swallows and swifts that have been encountered foraging over dust control areas. The black swift is a CSSC and if it has been associated with shallow flood habitat this should be mentioned.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 181 | CDFW      | Page 3-16, Line 3. Please identify how vegetation resources were assessed, including when, where, and by whom surveys were conducted.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 182 | CDFW      | Page 3-16, Line 14. The difference between bulrush and three-square is unclear. We recommend specifying the species of bulrush if they are different from three square or if they are the same, using the same common terminology.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 183 | CDFW      | Page 3-16, Line 30. When sections of the lake are mentioned specifically in text, it would be helpful if there was a parenthetical reference to the map page number.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 184 | CDFW      | Page 3-17, Line 32. Please add a citation source for information regarding Alkali Skipper.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response   |
|-----|-----------|---|---|
| 185 | CDFW      | Page 3-18, Line 2. This is a repeated scientific name for desert spiny lizard.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 186 | CDFW      | Page 3-18, Line 9. Please add a citation on bird community associations.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 187 | CDFW      | Page 3-18, Line 14. Please identify how small mammals were surveyed.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 188 | CDFW      | Page 3-18, Line 19. Please provide a citation to support the claim that saltgrass is a low quality forage species for tule elk. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 189 | CDFW      | Page 3-19, Line 19. Please include the scientific name of desert saltbush the first time it is used.                            | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 190 | CDFW      | Page 3-20, Line 3. Please correct spelling error on species name - owensii.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |



**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 191 | CDFW      | Page 3-20, Line 14. Please describe how snakes were surveyed.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.                    |
| 192 | CDFW      | Page 3-20, Line 22-23. The scientific names for kangaroo rat and pocket mouse are repeated.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.                    |
| 193 | CDFW      | Page 4-8, Line 24. Please explicitly state the water target.   | The text has been revised to state: "Specifically, water-intensive BACM, such as Shallow Flood, must be transitioned to water-efficient methods, such as tillage, in order to achieve the water savings and efficiency target (please refer to Section 4.0, Water Savings and Efficiency, for a detailed description of the target)." The description of the water savings and efficiency target is lengthy and it was not repeated in the dust control section. |
| 194 | CDFW      | Page 4-10, Line 30. Please add a citation to describe that desert shrubs use less water than salt grass and be specific about Incorporated.                |  |
| 195 | CDFW      | Page 4-12, Line 11. Please be more descriptive in regard to the chemistry of the salt mixture.   | The following text was added to the section: " <u>Solid-phase salts on Owens Lake are predominantly sodium salts of carbonate and sulfate. These carbonate salts in particular change form in response to changes in relative humidity and temperature that occur throughout a normal year. Wintertime forms can be soft and easily suspended by wind. However, this effect tends to be lessened by the presence of liquid brines or water.</u> "                |
| 196 | CDFW      | Page 4-12, Line 19 and 31. Please add citation/s of the various tillage implements that have been used to control dust and the wildlife using tilled land. | The text has been revised to state: "Thus, tillage for dust control on the playa would likely take multiple forms and require several distinct types of tools ( <u>e.g., switch plow, bull plow, Towner disk, and Sandfighter</u> )."  |
| 197 | CDFW      | Page 4-13, Line 17. Please add a citation about the capacity for soil binders to reduce dust.  | Incorporated.  |
| 198 | CDFW      | Page 6-2, Table 6-1. The terms freshwater, brackish, and saline should be defined the first time they are used.  | Incorporated. A footnote has been added to Table 3.1 to define freshwater, brackish, and saline.   |
| 199 | CDFW      | Page 6-3, Line 26. Please add a citation linking salinity and invert abundance.  | Incorporated.  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter   | Comment   | Status/Response   |
|-----|-------------|---|---|
| 200 | CDFW        | Page 6-3, Line 27. Please describe what, if any, additional factors might affect the invertebrate community. Although salinity may be an appropriate index of invertebrate abundance, we recommend that some monitoring of invertebrate abundance continues as this is the direct resource that is important for many bird species. | Monitoring parameters were selected by the Habitat Working Group based on acquiring the most information with the most resource efficiency. A citation has been added to strengthen the statement regarding salinity as an appropriate index of invertebrate abundance. Additional monitoring parameters may be discussed with the Habitat TAC at a later time.   |
| 201 | CDFW        | Page 6-7, Figure 6-2. If found present on Owens Lake, please consider adding Redheads, a (CSSC), to be included in the list of guild members.   | Comment noted. We recommend this topic be considered by the Habitat TAC at a later time. Please note that the HSM is a guild-based suitability model, not a species-specific suitability model.   |
| 202 | CDFW        | Page 6-9, Figure 6-3; Page 6-11, Figure 6-4; Page 6-13, Figure 6-5; Page 6-15 Figure 6-6; Page 6-17 Figure 6-7. The guild member lists should be more comprehensive and/or refer to an appendix that lists all species within each guild.   | Incorporated. The following statement has been added: " <u>Please refer to Appendix C for all the guild species and details of model parameters.</u> "  |
| 203 | CDFW        | Page 6-32, Line 8-11. Please describe whether there is a limitation on the total acreage that can be excluded from an HSM due to transition at any given time.  | Incorporated. The following statement has been added: " <u>As noted in Section 2.5, the SIP allows BACM transition to occur on no more than 1.5 square miles (960 acres) lake-wide for any BACM at any given time, except Managed Vegetation, which is limited to 0.5 square miles (320 acres).</u> "   |
| 204 | CDFW        | 6-33, Lines 1-4. The implementation time period and total time in transition should be stated for each of these methods.  | Implementation time periods and total transition time periods are dependent on specific details of transition projects (e.g., size and selected BACM). Timeframes will be available for transition projects when specific projects are proposed.  |
| 205 | Earl Wilson | Table of Contents. Line 6, 4.4.3. Correct overrun of text.  | Incorporated.   |
| 206 | Earl Wilson | List of Tables. Line 25. Correct formatting associated with Table 6-9.  | Incorporated.   |
| 207 | Earl Wilson | Section 1.0, Introduction. Note that the change lakebed is the second largest man made source of fugitive dust.   | Comment noted. Section 1.0 states the following: "...the dry lake bed was the major source of dust in Owens Valley and one of the largest sources of dust in the world."  |
| 208 | Earl Wilson | Section 1.1, Background. Change "a major" to "the major"  | Incorporated.   |
| 209 | Earl Wilson | Section 2.3.1. Correct misspelling - impendent.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.                |
| 210 | Earl Wilson | Page 3-20. Line 25. Clarify "for foraging or from roost sites."   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 211 | Earl Wilson | Section 4.4.2.5 Soil Binders. Line 14. Should "completed" be replaced with "accomplished"?  | Incorporated.   |
| 212 | Earl Wilson | Table 4-1. What ore deposit?  | The text was clarified to state "trona ore."  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                 | Comment  | Status/Response   |
|-----|---------------------------|--|---|
| 213 | Earl Wilson               | Section 5.1, Summary of LADWP Water Supply. Line 15, change "import" to "imports"  | Incorporated.   |
| 214 | Earl Wilson               | Table 6-9. Correct misspelling of salt.  | Incorporated.   |
| 215 | Earl Wilson               | Appendix pages A-5, line 20, and A-6, line 15. Change "inform Planning Committee's decisions" to "help the Planning Committee make their decisions."   | Appendix A is the Planning Committee Charter. The charter was adopted by the Planning Committee "as is." Therefore, no changes to the Charter have been made, unless previously agreed to by the Planning Committee.  |
| 216 | Eastern Sierra Land Trust | 1. Describe content and process for creating State Lands Commission master lease and Department of Fish and Game master permits.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 217 | Eastern Sierra Land Trust | 2. MOU for regulatory agencies and for other members of Advisory Committee needs to be worked out prior to final Master Plan.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 218 | GBUAPCD                   | 1. General: The term "lake bed" is two words not one as commonly used in the document.   | Incorporated. "Lakebed" was changed to "lake bed" throughout the document.  |
| 219 | GBUAPCD                   | 2. Figure 1-3, "Existing land Ownership" is a very important figure in the Plan. However, the land ownership information is very difficult to read on the underlying satellite image. The satellite image should be shown elsewhere so the land ownership is clear.  | Incorporated. The figure was revised for clarity. The transparency of the satellite image was increased so that the satellite image does not interfere with the land ownership information.   |
| 220 | GBUAPCD                   | 3. Page 1-4, Lines 3-5: the BACM Gravel measure works by covering the emissive surface with particles (gravel clasts) of sufficient size and thickness to prevent particle movement and emissive salt formation at the surface. Salt crusts may still be present or form below the gravel blanket.   | Incorporated.   |
| 221 | GBUAPCD                   | 4. Page 1-4, Line 10: insert "To date, the Commission has determined that, as implemented, Shallow Flood, Managed Vegetation....".   | The text in this section was revised per comments from the CSLC. The revised text states: " <u>The Commission evaluated each project on a case-by-case basis to determine if the project, as a whole, was either consistent with the Public Trust or not inconsistent with the Public Trust.</u> "  |
| 222 | GBUAPCD                   | 5. Page 1-5, Line 29-30, The District does not currently have a lease with the Commission as stated here. The City has a lease for implementation of DCMs and for the T12 Tilling test but not for generally developing dust control measures.   | Incorporated. The text was revised to state: " <u>Approximately 40 square miles are leased by the City of Los Angeles for the dust control project.</u> "   |
| 223 | GBUAPCD                   | 6. Page 1-5, Line 8: The delta is called the Owens River Delta not the "Lower Owens River Delta".  | Incorporated.   |
| 224 | GBUAPCD                   | 7. Page 2-1, Line 22: Dust control measure construction began in 2000 but were not actually "implemented" (constructed and fully operational) until December 31, 2001.   | Incorporated. Please note that this text is located in Section 1.3.3, Collaborative Result, of the Final Report.  |
| 225 | GBUAPCD                   | 8. Page 2-2, Line 21: Add a reference for the statement "...water conservation target of 50% of the annual water budget...". The Technical Memorandum by Plan Tierra in Appendix E is very short and does not provide sufficient analysis to support statement made here. Is there another reference that can be included? In addition, the 50 percent water conservation goal was unilaterally set forth by the DWP and was never really discussed by the full Planning Committee. This is a concern. | The Habitat Working Group met to discuss the water target on September 10 and October 22, 2012. Agreement on the target was reached at the October 30, 2012, Agency Forum, and the January 28, 2013, Planning Committee meetings. This target reflects the consensus of the Planning Committee. The section and appendix have been augmented to describe how the target was established and feasibility was determined. |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response   |
|-----|-----------|--|---|
| 226 | GBUAPCD   | 9. Page 2-7, Table 2-1: The right column contains a mix of items only some of which are actually a "Monitoring Parameter", as the heading states. Restructure or make more specific.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation. It was not necessary to address this comment.                |
| 227 | GBUAPCD   | 10. Section 3.2, Hydrology (pages 3-1 to 3-4): There are a number of errors and misstatements in the Hydrology section (especially in section 3.2). This section needs to be carefully reviewed and corrected for dates, elevations and overall content and references provided. The District will submit detailed suggested revisions under separate cover. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 228 | GBUAPCD   | 11. Section 3.3, Geology and Soils: There are a number of errors and misstatements in the Geology and Soils section. This section needs to be carefully reviewed and corrected and references provided. Again, the District will submit detailed suggested revisions under separate cover.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 229 | GBUAPCD   | 12. Page 3-1, Line 9: "10 cm of rainfall/yr." The District suggests the measurement units throughout the entire document be carefully reviewed. Here you are mixing metric with U.S. customary units. We have found that for documents prepared mainly for public consumption, U.S. customary unit are best.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 230 | GBUAPCD   | 13. Page 3-1, Line 16: Delete "as measured at a height of 32 feet." This is a technical monitoring issue and would just be confusing to the public.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 231 | GBUAPCD   | 14. Page 3-9, Line 4: There are some shrubs that have established on the playa but they are not greasewood. The most common shrub is Atriplex parryi. Most spring mounds are vegetated with saltgrass as the dominant species.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 232 | GBUAPCD   | 15. Page 4-6, Section 4.2.2 – "Control Efficiencies": Please remove this section. It has limited applicability and is generally just confusing.  | Comment noted. The text was developed with the Dust Control Work Group and no comments were received suggesting clarification. It provides context for the description of BACM; therefore, it was not removed from the section.   |

Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 233 | GBUAPCD   | 16. Page 4-9, Lines 25-27: The example given is not quite correct. An area with a mix of BACM does not necessarily need to be 75% covered to be compliant with the control requirements; instead the overall coverage required depends on the proportions of the measures used. The portion of the area that is flooded needs to be 75% wet (if the area requires 99% control) while the remaining areas that are controlled with either MV or Gravel need to meet the prescriptions for their respective compliant requirements. So in some cases there may be more than 75% total coverage of the area and in others there might be less than 75% coverage – it all depends on the mix of measures used and their proportions. If an area is mostly vegetation than the amount of area that is not covered (open) may be larger than 75%. If an area is mostly gravel, than the proportion of the area that is open will be less than 75%. A bit confusing – you may want to simplify the statement made and not provide an example. | Incorporated. The example was deleted.   |
| 234 | GBUAPCD   | 17. Page 4-10, Line 4: remove “potentially”. The increase salt content will reduce the amount of water needed for dust control. A different issue (and where the “potentially” term is needed), is whether the dust control measure will be operated to take advantage of this water reduction. Add information that shows what amount of evaporation reduction is due to increased salinity.  | Potentially was removed. The following footnote was added to provide additional detail on the amount of evaporation reduction due to increased salinity: <u>"The relative rate of water evaporation is reduced by 50 percent at a relatively high concentration of about 330,000 milligrams per liter (mg/L) of salt at the water surface. An 80 percent reduction occurs at about 450,000 mg/L. For context, average shallow groundwater salt concentration beneath the playa is about 120,000 mg/L, and the brine pool is about 450,000 mg/L."</u> |
| 235 | GBUAPCD   | 18. Page 4-10, Lines 8-10: The “Shallow Flood with Brine” must maintain required wetness levels in order to be compliant with dust control requirements. If the area does not have sufficient wetness and there are portions that are dried that are greater than those allowed for Shallow Flood BACM – then it falls into the “Managed Salt Flat” measure and needs to be tested and approved prior to implementation.   | The text was clarified to state: <u>"This feature could be non-compliant as Shallow Flood with Brine because it is too dry (but such a feature could be considered Managed Salt Flat, as described in Section 2.4.2.1)."</u>   |
| 236 | GBUAPCD   | 19. Page 4-10, Lines 18-23: Provide more information on the material from Haiwee Reservoir – or remove this paragraph altogether if this information is not available. How much material is available, what is it composed of... etc   | Information regarding the composition and quantity of material available from Haiwee Reservoir is not known. The text was clarified to state: <u>"Currently, no information is available regarding specific types or quantities of material from Haiwee Reservoir."</u>  |
| 237 | GBUAPCD   | 20. Page 4-10, Modified Gravel: Another potential modification to Gravel is to test leaving a portion of the area uncovered or only partially covered.   | Incorporated. This following text was added to the section: <u>"Another potential modification to Gravel is to test a portion of an area uncovered or only partially covered."</u>   |
| 238 | GBUAPCD   | 21. Page 4-10, Lines 30-32: Saltgrass is one word. The District conducted shrub research on the lake bed until the late 1900s and DRI has studied the physics of using large roughness elements (i.e. shrubs) for surface control. These projects would provide useful information for the statements made here.   | Additional information was added to the section to highlight these previous research projects. Please refer to Section 2.4.1.4 for the revised text.   |
| 239 | GBUAPCD   | 22. Page 4-11, Line 3: Provide information on the extent of vegetation present in T30-1 and T36-1. The term “substantial vegetation” is too vague. The City has conducted regular monitoring of the area and knows what the cover levels are.  | The text was revised to state: <u>"For example, the T30-1 and T36-1 areas contain vegetation, but are operated and managed to comply with Shallow Flood requirements and not Managed Vegetation. For example, in November 2011, T30-1 percent vegetation cover ranged from 0 percent to 100 percent, with a site-wide mean of 56 percent (Formation and NewFields 2013)."</u>  |
| 240 | GBUAPCD   | 23. Page 4-11, second bullet: Move to into the “Hybrid” section. This paragraph is not a type of “modified Managed Vegetation.”  | Incorporated. The bullet for "modified shallow flood" was moved into Section 2.4.1.5, Hybrid.  |
| 241 | GBUAPCD   | 24. Page 4-11, Section 4.4.1.6: this section describes the “Hybrid” measure of mixing the existing BACM. Why is it not included as part of Section 4.4.1.5?  | Incorporated. This section was moved into Section 2.4.1.5, Hybrid.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 242 | GBUAPCD   | 25. Page 4-17, Lines 22-24: The wording is unclear. Reword "...the SIP does not allow a temporary violation of the NAAQS...". There are no temporary violations – either it is a violation or it is not. There is a difference between a SIP revision and a variance. A variance is only allowed under certain specified conditions (such as a breakdown) and not for purposefully taking an area out of control. If the SIP is revised to include a more liberal transition policy then a variance is not needed. | The Planning Committee agreed to revise the language regarding a SIP amendment at its February 2012 meeting. The new language from the Planning Committee states: "In other words, the SIP does not allow a violation of NAAQS during the transition period. LADWP may pursue a SIP amendment <u>for this purpose. Not all Planning Committee members supported amending the SIP. LADWP would seek an Advisory Committee's input and support on any proposed SIP amendments.</u> " (An Advisory Committee was envisioned during the master planning process; however, it was not established. An Advisory Committee will be established for LADWP's Master Project.) |
| 243 | GBUAPCD   | 26. Page 4-17, Line 32-33: reword "...such that construction occurs during only one dust season" to "as much construction would occur outside of the dust season as much as possible."   | Incorporated. The text has been revised to state: "Transitions would occur on an 18-month cycle (i.e., July 1 to December 31), <u>such that as much construction would occur outside of the dust season as possible.</u> "   |
| 244 | GBUAPCD   | 27. Page 4-18, Lines 3-4: Incorrect statement. The 2011 Stipulated Order for Abatement for the former "Moat and Row" areas included potentially 6 square miles of transition area that were suitable, 3 square miles of which were going to be selected. There may be other additional areas that are suitable as well.  | The statement regarding three square miles of potential transitions is out of date and no longer applicable. The text was revised to state: "Potential transitions are limited by site-specific suitability (e.g., in some areas, Shallow Flood is the only suitable measure), maintenance of total baseline value-acres for the six target habitat guilds over time, and financial feasibility."  |
| 245 | GBUAPCD   | 28. Page 4-18, Line 7: Add "...when new and/or modified BACM are developed by the LADWP and approved by the District."   | The text has revised with up to date information and no longer describes three square miles of potential transitions. Revised text states: " <u>Potential transitions are limited by site-specific suitability (e.g., in some areas, Shallow Flood is the only suitable measure), maintenance of total baseline value-acres for the six target habitat guilds over time, and financial feasibility.</u> "  |
| 246 | GBUAPCD   | 29. Page 4-18, Line 29: Why is the "extent of potential maintenance activities" limited to only 30 of the 40 square miles of dust control?   | This statement was not accurate. Operation and maintenance activities would include all dust control areas. The text regarding 30 square miles was removed from the Final Report.  |
| 247 | GBUAPCD   | 30. Page 4-19, Line 2: Add "...deployed quickly in uncontrolled dust source areas..."  | The text has been clarified to state: "Immediate response stabilization measures could be deployed quickly in <u>uncontrolled</u> dust source areas to control emissions and to prevent the areas from expanding. These proposed measures could be deployed <u>outside</u> existing dust control areas, <u>in areas owned by or under lease to LADWP.</u> "  |
| 248 | GBUAPCD   | 31. Page 4-19, Line 4: change "...deployed within outside of existing ordered dust control areas." The "Immediate Response Measures" (except gravel or irrigation) are not allowed within ordered BACM areas for dust control purposes unless there is a specific variance that allows for them due to a breakdown and subsequent long-term repairs or some other special condition. Therefore, these measures would only be used outside of existing DCMS.  | The text has been clarified to state: "Immediate response stabilization measures could be deployed quickly in <u>uncontrolled</u> dust source areas to control emissions and to prevent the areas from expanding. These proposed measures could be deployed <u>outside</u> existing dust control areas, <u>in areas owned by or under lease to LADWP.</u> "  |
| 249 | GBUAPCD   | 32. Page 4-19, Line 23: The District has the responsibility for compliance and effectiveness monitoring of dust control areas not the LADWP.   | The text was revised to state the following: "Compliance monitoring of dust control on Owens Lake <u>is the responsibility of the District and is routinely conducted to check compliance.</u> "   |
| 250 | GBUAPCD   | 33. Page 5-1, Sec 5-1, "Summary of LADWP Water Supply": This section is unnecessarily long and only indirectly related to the Plan. Its inclusion in the plan proper weakens the collaborative tone of the document. We suggest making it an appendix.   | Not incorporated. The Planning Committee agreed at the February 2012 meeting to include the water supply text as a part of the document because it frames the importance of water savings and efficiency at Owens Lake.  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                        | Comment  | Status/Response  |
|-----|----------------------------------|--|--|
| 251 | GBUAPCD                          | 34. Page 5-6, Lines 7-9: It is the District's understanding that 95,000 acre-feet is no longer being used on the lake bed and that recent use has been considerably less. A table (with references) showing actual water use trends over time would add credibility to the document.   | Comment noted. This comment is in reference to providing context for the stated water savings target of 50 percent of the annual water budget. Section 4.0, Water Supply, Savings, and Efficiency, has been updated with new text to summarize two technical appendices that outline the determination of the water savings target and its feasibility. As noted in the section and appendices, the water savings target is no longer related to an annual water budget. It is based on the "through Phase 7" average annual water demand. |
| 252 | GBUAPCD                          | 35. Page 5-7, Groundwater Studies: The District is only involved in the OLGEP due to its knowledge of the area and its resources. The District does not have any regulatory jurisdiction on the use of groundwater for dust control.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 253 | GBUAPCD                          | 36. Habitat Suitability, Section 6: In the Habitat Technical Workgroup there was discussion on the Diving Waterbird guild (formerly the Open Water guild) and the amount of open water present on the lake being more than what is needed for the observed bird usage. This information appears to be lacking or not clearly presented in the current Master Plan draft. What is the status of this and is this going to be included in future versions? Currently there is a commitment to maintain all existing habitat value. Will this be possible given the current high level of value-acres for the Diving Waterbird guild? | The Habitat Work Group discussion referenced in the comment resulted in a habitat suitability parameter of ponds greater than 40 acres. This is identified in Table 3-2 in the habitat parameters for the Diving Waterbird Guild.  |
| 254 | GBUAPCD                          | 37. Page 6-19, Lines 14-16: clarify where the "seasonal variability" values can be found on Table 6.8. It is not labeled as such on the table.   | The seasonal variability percentages were previously located at the bottom of Table 6-8. This table (now Table 3-8) has been revised for clarity. The seasonal variability percentages are now located at the top of the table.  |
| 255 | GBUAPCD                          | 38. Figure 7-1 "Public Access Points": The name Aeolian Road is no longer appropriate. It is the name of a road used by the District long before there were controls on the lake bed and, for the most part, no longer exists. The "Brady Highway" actually starts at Hwy 395 North (at Boulder Creek) and lops all the way down and back to Hwy 395 South (at Willow Dip). It was named in memory of and out of respect for someone close to many of us.  | Incorporated.  |
| 256 | GBUAPCD                          | Add a definition section.  | The 2011 Draft Owens Lake Master Plan included many unique terms (mostly associated with the topics of groundwater and implementation) and it warranted inclusion of a definition section. The Final Report does not include these topics, therefore a definition section was not included. Terms such as BACM, water savings, and water efficiency are defined the first time they are used.  |
| 257 | Inyo County Board of Supervisors | 1. The Master Plan should include a goal to work to provide water for areas of the Owens Valley that historically received water that has been diverted to the Lake. The ecosystem of the Owens Valley as a whole should not be compromised for the Lake micro-ecosystem. We suggest that this goal be included with priority on page 1-8 and 1-9 (Section 1.4.2), as well as discussed in more detail in pages 2-1 through 2-3 (Section 2.1) and Chapter 5 (pages 5-1 through 5-8, and particularly Section 5-2 on page 5-6).   | The goals of the master planning process were established by the Planning Committee and are not eligible for revision, unless previously agreed to by the Planning Committee. However, this comment is reflective of a discussion held at the February 2012 Planning Committee meeting that resulted in a new section (Section 4.3, Excess Water and County of Inyo) to describe that excess water will likely be available for the Owens Valley in wet years.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                        | Comment  | Status/Response  |
|-----|----------------------------------|--|--|
| 258 | Inyo County Board of Supervisors | 2. The Master Plan should acknowledge the County's General Plan, Zoning Ordinance, Renewable Energy Ordinance, and other relevant planning policies and regulations within and adjacent to the Plan boundary. We suggest a new section or chapter to address relevant plans, regulations, and policies more broadly. Possible locations include a new section in Chapter 1 (pages 1-1 through 1-9) or a new chapter describing the regulatory background between existing draft Chapters 2 and 3. Reference to the Renewable Energy Ordinance should be included in Section 7.4 (pages 7-24 through 7-26). (Please see attachment).  | This comment is no longer applicable because this document is no longer a master plan. This document is a report on the collaboration of the Planning Committee during the master planning process. We recommend this comment be addressed in development of the Master Project and the associated CEQA document.  |
| 259 | Inyo County Board of Supervisors | 3. The Master Plan should provide additional background regarding the Long-term Water Agreement (LTWA) between the County and the City of Los Angeles. We suggest that this issue be elaborated in Chapter 5 (particularly in Section 5.3 on page 5-7) and/or in a new section or chapter regarding the regulatory background described above (Please see attachment). The Master Plan should not conflict with the Long-term Water Agreement.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address the groundwater portion of this comment. Regarding the addition of a regulatory background section, this comment is no longer applicable because this document is no longer a master plan. This document is a report on the collaboration of the Planning Committee during the master planning process. We recommend this comment be addressed in development of the Master Project and the associated CEQA document. |
| 260 | Inyo County Board of Supervisors | 4. The Master Plan should address public services, utilities, and infrastructure to provide for development of master plan components. We suggest a new section or chapter to discuss these and other relevant issues, such as within Chapter 7 (pages 7-1 through 7-28) or in a new chapter between existing Chapters 7 and 8. (Please see attachment).   | The Final Report documents the consensus of the Planning Committee during the master planning process. The Final Report does not propose implementation of projects. When projects are proposed for implementation, the assessment of potential impacts to Inyo County will be assessed pursuant to CEQA.  |
| 261 | Inyo County Board of Supervisors | 5. The Master Plan should provide for vector control, such as for mosquito control, for communities bordering the planning area. These issues have been kept under control by extensive monitoring and control programs of the Inyo/Mono Agriculture Commissioner, and require continuing attention to avoid public health and ecological harm. The Plan should address these potentially negative impacts resulting from it. We suggest discussing these topics in Chapter 6 in a new section or integrated into Sections 6.5.2 and 6.6 (pages 6-35 through 6-40). Additionally, section 8.6 should include a section specific to the potential of unforeseen mosquito and biting insect problems arising from management actions. These issues may present undue strain on local jurisdictions and present significant health-related issues to surrounding populations. Some mention of the potential of these species to diminish public trust resources, such as recreation, access to recreation, and agricultural use, should exist. We suggest including this in sections 7.1 and 7.5. | The Final Report documents the consensus of the Planning Committee during the master planning process. The Final Report does not propose implementation of projects. It is important to note that environmental impacts associated with projects on the lake bed will be considered in CEQA analyses when such projects are proposed. In addition, the Planning Committee did not reach consensus on the Implementation section (Section 8.0); therefore, it was removed from the document.  |
| 262 | Inyo County Board of Supervisors | 6a. The Master Plan should note in section 3.4 that invasive plant species have been discovered within the planning area previously, and continue to pose a threat within the planning area. Indeed, a recent presentation by a scientist during an Owens Lake Committee gathering emphasized the potential for invasive plant colonization. The scientist expressed surprise that invasive plant species were not already a problem.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. However, it is important to note that LADWP currently has an invasive plant management program (see Resource Management Plan by LADWP 2010).   |
| 263 | Inyo County Board of Supervisors | 6b. The Master Plan should provide for invasive species management within the planning area. Funding for invasive species management and eradication is being reduced, and the Plan may result in impacts from invasive species to nearby lands that will increase costs to the County and/or other entities, such as within the Lower Owens River Plan area. We suggest discussing these topics in Chapter 6 in a new section or integrated into sections 6.5.3 or 6.6 (pages 6-36 through 6-40). Table 6-9, Vegetation Structure and Vegetation Richness row, Potential Management column, should be rephrased "Add native plant species to increase structural diversity w/in current compliance criteria".   | Regarding providing for invasive plant management, this comment is no longer applicable because this document is no longer a master plan. This document is a report on the collaboration of the Planning Committee during the master planning process. We recommend this comment be addressed in development of LADWP's Master Project and the associated CEQA document. Comment incorporated in Table 3-9.  |



**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                        | Comment   | Status/Response  |
|-----|----------------------------------|---|--|
| 264 | Inyo County Board of Supervisors | 6c. Some mention of the potential of these species to diminish public trust resources, such as recreation, access to recreation, wildlife habitat, agricultural use, and scenic amenities should exist. We suggest including this in sections 3.4, 7.1, 7.2, and 7.5.   | This comment is no longer applicable because this document is no longer a master plan. This document is a report on the collaboration of the Planning Committee during the master planning process. We recommend this comment be addressed in development of the Master Project and the associated CEQA document.  |
| 265 | Inyo County Board of Supervisors | 7. The Master Plan should include financial feasibility analyses and identify funding opportunities. We suggest a new section in Chapter 8 to address financial feasibility and/or expanding Section 8.5 (pages 8-8 and 8-9).   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 266 | Inyo County Board of Supervisors | 8. Lands within the Lower Owens River Project (LORP) should continue to be excluded from the plan. They should, however, be recognized and any existing plans and/or regulations pertaining to them, such as the Inyo County, City of Los Angeles, Long Term Water Agreement, should be followed. We suggest clarifying these points on pages 1-5 and 1-6 (Sections 1.3.1- 1.3.2 and Figure 1-3). | Section 1.2.1 states that lands within the LORP are excluded from the planning area. This area was not added to Figure 1-3, Land Ownership, because it is not land ownership. The Final Report does not include a section describing existing plans and regulations because the document is no longer a Master Plan. We recommend this comment be considered during development of the Master Project and its CEQA analysis.   |
| 267 | Inyo County Board of Supervisors | 9. While we previously indicated that the County's property should not be included within the plan, we now believe that the inclusion of this property may be appropriate and wish to analyze the issue further. We are concerned that the Plan may impact biological and/or other resources on our property, and believe that these issues need to be clarified.                                 | Comment noted. This comment is no longer applicable to the Final Report, because the document is no longer a master plan. We recommend this comment be considered during development of the Master Project and its CEQA analysis.  |
| 268 | Inyo County Board of Supervisors | 10. The plan should encourage economic vitality on the Lakebed, including for current and future uses. We suggest expanding the fourth bullet on page 1-9 (lines 6 and 7, Section 1.4.2) as well as the discussion in Sections 7.5 and 7.6 (pages 7-26 through 7-28). (Please see attachment).  | One of the stated goals of the Planning Committee is to "promote economic development in the area, as well as tourism, public access, and educational opportunities at Owens Lake." The goals of the master planning process were established by the Planning Committee and are not eligible for revision. Section 5.1, Public Access, Education, and Recreation; Section 5.4, Grazing; and Section 5.5, Mining, all note that these activities contribute to the local economy and are supported by the Planning Committee. |
| 269 | LADWP                            | Is this still a Master Plan, which is a legal term of art, or is this a set of guidelines or a framework with which to move forward as specific projects and activities are contemplated on the lake?   | The term "master plan" is no longer used to characterize the document. The title of the document is "Report on Owens Lake Master Planning Collaboration."  |
| 270 | LADWP                            | Pg 1-1, line 3, should say "beginning in the 1860s, withdrawals by <u>non-City of Los Angeles sources</u> from the Owens River..."  | Incorporated.  |
| 271 | LADWP                            | Pg 1-1, line 8, should add at the end of the sentence "controlling almost 90% of the dust."   | Incorporated.  |
| 272 | LADWP                            | Pg 1-1, line 20, should say "Owens Lake <u>bed</u> covers approximately 110 square miles..." as the lake was often smaller than this. See page 3-1 that describes a "fluctuating saline lake."  | Incorporated.  |
| 273 | LADWP                            | Pg 1-4, line 10-11, the Commission has allowed the Phase 8 gravel project, but made it clear that additional gravel may not be approved in the future, and as written, it implies that it has.  | The text in this section was revised per comments from the CSLC. The revised text states: " <u>The Commission evaluated each project on a case-by-case basis to determine if the project, as a whole, was either consistent with the Public Trust or not inconsistent with the Public Trust.</u> "   |
| 274 | LADWP                            | Pg 1-5, line 1, should say "The plan area is the Owens Lake, <u>defined for the purpose of this plan</u> , as the area below..."  | The text was revised to state: "The planning area considered by the Planning Committee is Owens Lake, defined as the area below its historic shoreline, 3,600 feet above sea level."   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response   |
|-----|-----------|---|---|
| 275 | LADWP     | Pg 1-5, line 24, should say "interests, including the Federal Bureau of Land Management (Figure 1.3)."  | Incorporated.   |
| 276 | LADWP     | Pg 1-5, line 29-30, should say "Most of the remaining lakebed areas are either leased by the District or the City of Los Angeles for the purposes of developing dust control measures."   | Incorporated. Revised text states: " <u>Approximately 40 square miles are leased by the City of Los Angeles for the dust control project.</u> "   |
| 277 | LADWP     | Pg 1-6, Figure 1-3, the figure should have a reference.   | A reference has been added to Figure 1-3.   |
| 278 | LADWP     | Pg 1-7, line 1, should say " <u>A large portion</u> of the non-State-owned lakebed is owned by..."  | Incorporated.   |
| 279 | LADWP     | Pg 2-2, line 21 " <u>current</u> " should be placed before "annual water budget"  | The text referenced in the comment is no longer applicable. The water savings and efficiency target is no longer based on a percent savings of the annual water budget. The target is described in detail in Section 4.0, Water Supply, Savings, and Efficiency.  |
| 280 | LADWP     | Pg 2, lines 18-23, and page 2-6, lines 10-13: LADWP views the master plan as a package in which all goals need to be achieved in order for the plan to be successful  | Comment noted. The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. This includes the summary of Section 8.0 that was included in Section 2.3, Overview of Implementation.   |
| 281 | LADWP     | Pg 3-2, line 1, implies the lake changed in 1913. The fact is that diversions of water began long before 1913, and in fact, the lake was at a lower level in 1905 than it was in 1913. It would be fairer to say that Owens Lake was an alkali lake prior to desiccation. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 282 | LADWP     | Pg 3-2, line 6, the correct date may be 1872, not 1878.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 283 | LADWP     | Pg 3-10, lines 13 and 14: It should state "and at the north end in the Delta area where winter water entered the lakebed from the Lower Owens River (not the aqueduct)."  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |

Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)

| No. | Commenter | Comment  | Status/Response   |
|-----|-----------|--|---|
| 284 | LADWP     | Pg 3-14, lines 20-21. Should read that "nesting is currently observed <u>well into</u> July", not just in July.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.   |
| 285 | LADWP     | Pg 4-2, line 15, "could not" should be "was not"   | Incorporated.   |
| 286 | LADWP     | Pg 4-2, lines 24-26, please check facts  | This section was reviewed and determined to be accurate.  |
| 287 | LADWP     | Pg 4-4, Figure 4-1, there should be a more up-to-date figure available.  | This figure is current and reflects existing dust control areas on the lake bed.  |
| 288 | LADWP     | Pg 4-8, lines 1-7, has language regarding the APCO's "full and sole discretion." If this is to be characterized this way, then we should also point out that LADWP has the right to challenge any such determinations.   | Incorporated. The following sentence was added: " <u>All determinations can be subject to challenge.</u> "  |
| 289 | LADWP     | Pg 4-8, line 14 and pg 4-9, line 3, it may not be just LADWP that is applying for permits or pursuing BACM, it should be a Planning Committee Group effort.  | The document is no longer a Master Plan, with the intent of being implemented by the Planning Committee. As a result, this comment is no longer applicable.   |
| 290 | LADWP     | Pg 4-15, line 3, It is possible that it may be the group, not just LADWP that might pursue a SIP amendment, why couldn't it be a Planning Committee Group effort?  | The Planning Committee agreed to revise the language regarding a SIP amendment at its February 2012 meeting. The new language from the Planning Committee (in Section 2.5) states: " <u>Not all Planning Committee members supported amending the SIP. LADWP would seek an Advisory Committee's input and support on any proposed SIP amendments.</u> " (An Advisory Committee was envisioned during the master planning process; however, it was not established. An Advisory Committee will be established for LADWP's Master Project.) The text addressed by this comment was not revised, per the Planning Committee discussion at the February 2012 meeting. |
| 291 | LADWP     | Pg 4-17, lines 15-26: Transition to modified or new BACM must allow sufficient time for development of vegetation and achieving dust control standards. Meeting instantaneous habitat and dust control requirements is not possible and takes away needed flexibility to produce the habitat quality necessary. The end product is much more effective for both water conservation and wildlife needs, given proper time to establish. GBUAPCD must allow for this via a SIP modification, which should be pursued by the group, not just LADWP. | The Planning Committee agreed to revise the language regarding a SIP amendment at its Feb 2012 meeting. The new language from the Planning Committee states: "In other words, the SIP does not allow a violation of NAAQS during the transition period. LADWP may pursue a SIP amendment <u>for this purpose. Not all Planning Committee members supported amending the SIP. LADWP would seek an Advisory Committee's input and support on any proposed SIP amendments.</u> " (An Advisory Committee was envisioned during the master planning process; however, it was not established. An Advisory Committee will be established for LADWP's Master Project.)   |
| 292 | LADWP     | Pg 4-18, line 3-5, states that current estimated potential for transition to managed vegetation is three miles. This seems low. This should be checked and the source of the information references so it is more clear.   | The statement regarding three square miles of potential transitions is out of date and no longer applicable. The text was revised to state: "Potential transitions are limited by site-specific suitability, maintenance of total baseline value-acres for the six target habitat guilds over time, and financial feasibility."   |
| 293 | LADWP     | Pg 4-18, line 23, please add "LADWP" before "Owens Lake Operations Team"   | Incorporated.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment   | Status/Response   |
|-----|-----------|---|---|
| 294 | LADWP     | Pg 4-18, line 28, add unless there are overriding considerations as outlined in Section 8.6, Changed and Unforeseen Circumstances"  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 295 | LADWP     | Pg 4-18, lines 31-32: Routine operations and maintenance is explained in the Habitat Management Plan (OLHMP) already and should not be included in detail in the annual work plan. Major proposed maintenance activities (outside routine O&M) could be summarized and included in the annual work plan.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The Planning Committee did not reach consensus on implementation, therefore this topic, including annual work plans, were removed from the document. The comment is no longer applicable.  |
| 296 | LADWP     | Pg 4-20, line 1, same comment as above regarding routine O&M not being part of this   | The Final Report documents the consensus of the Planning Committee during the master planning process. The Planning Committee did not reach consensus on implementation, therefore this topic, including annual work plans, were removed from the document. The comment is no longer applicable.  |
| 297 | LADWP     | Pg 5-2, lines 8-10, the 200afy and 110 afy numbers are not correct - I think there is some double-counting here. Please see page 111 and 113 of the Urban Water Management Plan for the correct numbers. Exhibit 5c has historical aqueduct deliveries, and Exhibit 5e has the breakdown of water use other than aqueduct deliveries to LA.   | Comment noted, no change made. Page 110 of the UWMP states the following: "As a result, the City has used approximately 205,800 AF of water supplies for environmental mitigation and enhancement in the Owens Valley and Mono Basin regions in 2010, which is in addition to the almost 107,300 acre-feet per year (AFY) supplied for agricultural, stockwater, and Native American Reservations." |
| 298 | LADWP     | Pg 5-4, in this section, it would be prudent to point out that as a result of these conservation efforts, Los Angeles has the lowest per capita water use of any city in the nation with populations of more than million people.   | Incorporated.   |
| 299 | LADWP     | Pg 5-6, line 9, should read LADWP Board of Commissioners, not Directors.  | Incorporated.   |
| 300 | LADWP     | Pg 5-6, line 13, should add "as defined by law" after "beneficial uses"   | Incorporated.   |
| 301 | LADWP     | Pg 5-6, line 17, should read "...target of 50 percent of the <u>current</u> annual water budget..."   | Regarding the water savings target, Section 4.0, Water Supply, Savings, and Efficiency, has been updated with new text to summarize two technical appendices that outline the determination of the water savings target and its feasibility.  |
| 302 | LADWP     | Pg 5-7, lines 12-27: LADWP with Inyo County and other jurisdictional parties will develop a groundwater management scheme to avoid the most diverse and sensitive spring habitats (i.e. have potential for spring snails) while other habitats of lesser ecological value may be degraded; yet replaced with suitable habitat elsewhere within dust control sites under the HSI system. If reasonable groundwater criteria cannot be developed that allows pumping of groundwater from on the lakebed in an appropriate manner, plan goals will be jeopardized. | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 303 | LADWP     | Pg 5-7, line 22, an agreement has been reached between LADWP and Inyo County that they along with other jurisdictional parties will develop a groundwater management strategy for Owens Lake. Development of this management strategy will make the question regarding the applicability of the Long Term Water Agreement moot.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 304 | LADWP     | Pg 6-31, line 6, change "The section also describes how the HSM <u>should be</u> used to ..."   | Incorporated.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter | Comment  | Status/Response  |
|-----|-----------|--|--|
| 305 | LADWP     | Pg 6-31, line 11, this might apply to more entities than just LADWP, such as if a solar project proponent emerged.   | No change made. This sentence refers to areas within the dust control project. The sentence states: "Management of habitat value-acres within the dust control project is the responsibility of LADWP." Habitat management in non-dust control areas is described in Section 3.4.3.4.  |
| 306 | LADWP     | Pg 7-4, section 7.1.4 - with regard to public access, it would be wise to include a discussion about how this will be done safely, i.e., subject to safety concerns.   | Incorporated. The text in the bullet regarding "protocol for organized tours" has been revised to state: "The guidelines should also address hunting practices and <u>safety of the public and LADWP personnel.</u> " In addition, at the end of this section it is stated: "All potential actions would be implemented to ensure public and worker safety, avoid operational facilities for dust control, avoid or minimize disturbances to resources (i.e., wildlife, cultural, grazing, mining), and be consistent with all applicable agreements and regulations." Specific safety protocols will be identified during development of the Interpretive Plan. |
| 307 | LADWP     | Pg 7-18, section 7.3 - a statement that Cultural Resources are federally protected and this framework must be in compliance with such laws should be included.   | The text has been clarified to state: "There are numerous laws and regulations related to the protection of cultural resources. All projects on the lake <u>must comply with</u> applicable regulations for the protection of cultural resources. Table 5-2 summarizes some of the key laws and regulations."  |
| 308 | LADWP     | Pg 8-1, Section 8-1, lines 32-33, LADWP should not have any additional mitigation imposed on them for future projects if they are operating under the guidelines of the Master Framework. Unforeseen and significant requirements under lease agreements or regulatory permits may cause LADWP to withdraw as a participant in the Master Plan. Responsible agencies are expected to issue lease agreements and permits using the master framework as an appendix for conditions of the regulatory document. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 309 | LADWP     | Pg 8-2, lines 16, December 31 does not give enough time to prepare work plans given other commitments. We will need at least another month.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 310 | LADWP     | Pg 8-3, line 9, should the Advisory Committee make "decisions" or would making "recommendations" be more appropriate since they are acting in an "advisory" role?  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 311 | LADWP     | Pg 8-4, line 26, should say "review <u>and recommend refinements to management activities and</u> modifications in monitoring and data analyses..."  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 312 | LADWP     | Pg 8-5, line 14, "make decisions" should be subject to extent allowed by respective boards/commissions, and does not preclude rights to pursue litigation by any party   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                             | Comment   | Status/Response  |
|-----|---------------------------------------|---|--|
| 313 | LADWP                                 | Pg 8-5, line 26, should we say "TAC or TACS"; there might be multiple areas of expertise?   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. |
| 314 | LADWP                                 | Pg 8-6, lines 5-12: The ability for the Habitat TAC to reject Habitat/Dust control proposals is giving too much power to the Technical Advisory Committee, especially of the proposals insure balance of the HIS and the Department is under a tight schedule with CEQA, permits, and other approvals. The TAC members may request the most desirable alternative to fit their personal or special interest goals while the Department is the entity bearing the cost of implementing and maintaining the project. If the Department is operating under pre-approved habitats that will suffice in exchange then that should allow for an expedited situation. If the Department has the ability of picking between reasonable alternatives that are acceptable then advice could be sought from the Habitat TAC as to which alternative is preferred. As long as the Department, or entity responsible for dust control, operates under the umbrella of the master plan framework the proposal should not have to go through a lengthy process and potentially dispute resolution. | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. |
| 315 | LADWP                                 | Pg 8-7, lines 32-33, "but subject to the approval of agency boards and commissions, or litigation" should be added to the end.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. |
| 316 | LADWP                                 | Pg 8-9, line 1-2, operations and maintenance activities happened now, and will continue, and should not be subject to review. Only if the maintenance activities involve a transition or transformation of a BACM measure (major surgery beyond standard maintenance) should it be subject to such review. Oftentimes, we must do O&M immediately, particularly in emergency situations such as the recent breakdowns we have experiences on the lake.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. |
| 317 | LADWP                                 | Pg 8-9, line 10, should include exigent circumstances or force majeure  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. |
| 318 | LADWP                                 | Pg 8-9, Table 8.1, Likely should read "Owens Pupfish" instead of Desert Pupfish. Desert pupfish are not native to the Owens Basin.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment. |
| 319 | Lone Pine Paiute-Shoshone Reservation | Pg 1-5, section 1.3.1, line 14:<br>14 reservation, the Lone Pine Indian Reservation, in the vicinity to the north of the lake (Sapphos) Change to 'Lone Pine Paiute-Shoshone Reservation'. Add '5 air miles from Owens Lake'  | Incorporated.  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                             | Comment  | Status/Response  |
|-----|---------------------------------------|--|--|
| 320 | Lone Pine Paiute-Shoshone Reservation | <p>Pgs 1-8, section 1.4.2, lines 5, 6:<br/>5 Control dust on the Owens Lakebed to obtain good air quality and reduce the dust<br/>6 related public health risk.</p> <p>This is already demanded of the LADWP by the federal EPA and monitored/enforced by GBUAPCD. The processes and specific goals are not options to be determined nor compromised by this Master Plan or the Planning Committee. Inserting a goal that exceeds the NAAQS would be acceptable. Any language that may, in any possible way, serve to conflict with terms of the SIP or impart delays for the benefit of the Master Plan projects should be eliminated from this document.</p>                     | <p>Comment noted. The goals of the Planning Committee do not conflict with the SIP or impart any delays for the benefit of future projects on the lake bed.</p>  |
| 321 | Lone Pine Paiute-Shoshone Reservation | <p>Pg 2-2, section 2.1, line 21:<br/>21 "water conservation target of 50 percent of the annual water budget should be feasible within the..." Water reduction needs to be defined and validated. LADWP is free to seek methods to reduce water while mitigating PM10 within the requirements of the SIP.</p>   | <p>The Habitat Working Group met to discuss the water target on September 10 and October 22, 2012. Agreement on the target was reached at the October 30, 2012, Agency Forum, and the January 28, 2013, Planning Committee meetings. This target reflects the consensus of the Planning Committee. The section and appendix have been augmented to describe how the target was established and feasibility was determined.</p>   |
| 322 | Lone Pine Paiute-Shoshone Reservation | <p>Pg 2-7, section 2.3.2, table 2.1:<br/>Dust Control</p> <p>A monitoring summary will be provided to the Master Plan Coordinator by LADWP. Progress on development and approval of new and modified BACM. Implementation of operations and maintenance activities. Implementation of dust control transitions. Implementation of proactive immediate response stabilization measures. If it is only for notification of project leaders so that they understand what is happening and where, then it is harmless. If it interferes with the court-ordered SIP process, then LPPSR will be concerned.</p>  | <p>Comment noted. The document does not interfere with the SIP process. Furthermore, the Planning Committee did not reach consensus on implementation, including monitoring; therefore, these topics were removed from the document.</p>   |
| 323 | Lone Pine Paiute-Shoshone Reservation | <p>Pg 4-8, section 4.4</p> <p>4.4 Potential New and Modified Dust Control Methods</p> <p>LPPSR objects to this section as a part of the Master Plan. As stated in the previous section, 4.3, BACM development is determined through the SIP. This Plan should not be used to undermine those procedures or to encourage the Planning Committee to lobby for alternatives in order to fulfill these newly devised "goals" for the Owens Lake area. Monitoring reports will provide the project leaders with the type and status of any new dust mitigation testing. There is nothing to stop the Committee or any citizen from suggesting creative new BACM ideas to the LADWP.</p> | <p>Comment noted. The document does not interfere with the SIP process.</p>  |
| 324 | Lone Pine Paiute-Shoshone Reservation | <p>Pg 4-15, lines 3, 4 :</p> <p>3 dust control areas. LADWP may pursue a SIP amendment to allow potential new BACM to be tested within designated dust control areas.</p> <p>Whether or not LADWP pursues a SIP amendment is not a subject for the Committee, and does not belong in this document. It only serves to promote and politicize the process for court-ordered dust mitigation.</p>  | <p>The Planning Committee agreed to revise the language regarding a SIP amendment at its February 2012 meeting. The new language from the Planning Committee (in Section 2.5) states: "<u>Not all Planning Committee members supported amending the SIP. LADWP would seek an Advisory Committee's input and support on any proposed SIP amendments.</u>" (An Advisory Committee was envisioned during the master planning process; however, it was not established. An Advisory Committee will be established for LADWP's Master Project.) The text addressed by this comment was not revised, per the Planning Committee discussion at the February 2012 meeting.</p> |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                             | Comment  | Status/Response  |
|-----|---------------------------------------|--|--|
| 325 | Lone Pine Paiute-Shoshone Reservation | <p>Pg 4-17, section 4.5, lines 22-26:<br/>22 level, the APCO has the discretion to terminate the transition at any time. In other words, the SIP does not allow a temporary violation of NAAQS during the transition period. LADWP may pursue a SIP amendment to allow for a variance because a violation could occur even with implementation of a thorough Dust Mitigation Program. The Planning Committee supports a SIP amendment for this purpose.</p> <p>Temporary violations of NAAQS are not acceptable as a planning option. Violations of air quality from the Owens Lake are a direct result of LADWP's water "conservation" efforts. To include the Planning Committee in the de facto acceptance of air quality standard violations in order to save money and time for Los Angeles is improper, and leverages the good intentions of environmentally conscientious Committee members to these ends. The LPPSR will not, under any circumstances, support the "draft" document with this language. The Master Plan cannot undermine the primary goal that LADWP is required to meet – the mitigation of harmful dust from the Owens lakebed.</p>  | <p>The Planning Committee agreed to revise the language regarding a SIP amendment at its February 2012 meeting. The new language from the Planning Committee states: "In other words, the SIP does not allow a violation of NAAQS during the transition period. LADWP may pursue a SIP amendment <u>for this purpose. Not all Planning Committee members supported amending the SIP. LADWP would seek an Advisory Committee's input and support on any proposed SIP amendments.</u>" (An Advisory Committee was envisioned during the master planning process; however, it was not established. An Advisory Committee will be established for LADWP's Master Project.)</p> |
| 326 | Lone Pine Paiute-Shoshone Reservation | <p>Pg 7-1, section 7.0, lines 6, 7:<br/>6 The Planning Committee included recommendations for these resources in order to enhance public access, education, recreation, and cultural resources; protect scenic amenities; and maintain. Change to "protect cultural resources".</p>  | Incorporated.  |
| 327 | Lone Pine Paiute-Shoshone Reservation | <p>Pg 7-23, lines 20 – 36:<br/>20 7.3.3 Enhancement of Cultural Resources. The Planning Committee recognizes the cultural significance of the plan area and that projects on the lake have the potential to affect cultural resources due to public access and other activities, such as construction. Public access can affect cultural resources due to increased traffic, looting, and vandalism. New project construction can impact cultural resources due to ground-disturbing activities, which can cause exposure and damage. Numerous laws and regulations require Federal, State, and local agencies to consider the effects a project may have on cultural resources. Future projects will continue to follow applicable regulations. In addition, when the Owens Lake Interpretive Plan (as described in Section 7.1, Public Access, Education, and Recreation) is developed, the authors of the plan will consult with local tribes to minimize potential impacts associated with increased public access. Many of the existing access routes were prehistoric access points to lakeshore springs and surrounding drainages and the current routes are only the latest in a long history of use along these corridors. These access areas hold cultural and/or religious importance to Native American communities within the region. Accordingly, the Owens Lake Interpretive Plan will be developed in coordination with tribes, including determination of open and guided access areas, location and extent of trails, and guided tour and hunting protocols.<br/>LPPSR feels this all looks appropriate.</p> | Comment noted, no change requested.  |
| 328 | Mark Bagley                           | <p>For all chapters–Master Plan references MOAs and lease as integral part of agreement structure, implementation and dispute resolution. The MOAs and the lease or leases need to be prepared, reviewed and agreed to prior to final approval of the Master Plan in order to confirm that parties are in agreement on all material issues. We propose that a Master Lease Agreement be drafted by SLC to incorporate and reference the Master Plan, particularly the HSM.</p>   | <p>The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.</p>  |



**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter   | Comment  | Status/Response   |
|-----|-------------|--|---|
| 329 | Mark Bagley | Chapter 2—Concern: Approval of Master Plan must be subject to review and approval of lease and permit agreements and MOAs.<br>Proposal: Require sign-off and execution of Master Plan to be contingent on review and confirmation of Master Lease Agreement and all MOAs.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 330 | Mark Bagley | Chapter 2-2—Concern: Water conservation target of 50% not arrived at collaboratively.<br>Proposal: Adjust target based on collaborative review. A joint committee or meeting comprised of the Habitat Committee and Water Committee should determine the appropriate water conservation target and then report to Planning Committee for adoption in Master Plan.  | The Habitat Working Group met to discuss the water target on September 10 and October 22, 2012. Agreement on the target was reached at the October 30, 2012, Agency Forum, and the January 28, 2013, Planning Committee meetings. This target reflects the consensus of the Planning Committee. The section and appendix have been augmented to describe how the target was established and feasibility was determined.   |
| 331 | Mark Bagley | Chapter 5—Issue: The groundwater proposals have not been reviewed, nor was it determined with input from the Planning Committee. Review of the Planning Committee should be required prior to sign-off on those provisions. If groundwater withdrawal is subject to agreement between LADWP, the District, and Inyo County, how does this relate to the AC and the Master Plan? What role should groundwater have in the plan? The PC also never agreed to/discussed the goal of 50% water reduction; the feasibility of achieving this while maintaining baseline habitat should be reviewed by outside experts. This chapter also makes no reference to the work done to date by PC members on cataloging/prioritizing of the seeps and springs.<br>Proposal: Include a chart which shows historical water use on the lakebed to help put in perspective the 50% reduction; convene a meeting per recommendation above in Chapter 2. Convene a subcommittee to rank and catalogue seeps and springs (begun under the CAP process). | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address the groundwater portion of this comment. Regarding the water savings target, Section 4.0, Water Supply, Savings, and Efficiency, has been updated with new text to summarize two technical appendices that outline the determination of the water savings target and its feasibility. As noted in the section and appendices, the water savings target is no longer related to an annual water budget. It is based on the "through Phase 7" average annual water demand. |
| 332 | Mark Bagley | OVC and Sierra Club are not in agreement with section 5.3 on groundwater studies. It is too vague. For example "safe yield" needs to be defined and the resource protection criteria, well there are none. OVC and Sierra Club do not want any pumping at Owens Lake that will result in reductions in spring flows for the major springs around the lakebed.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 333 | Other       | Remove CARB from the list of Agency Forum members  | Incorporated.   |
| 334 | Rio Tinto   | In Table 4-1. Processes for Developing Soil Binders for Owens Lake Dust Control<br>Under Technical Process, fifth box from top, it says "Materials to be used only on roads and berms, or for temporary dust control, would not fall into this category"<br>I am unclear what this means, this could be a significant amount of binder and it seems it should be evaluated carefully. My concern is eventually anything soluble used above the brine pool will migrate to the lowest point which contains the ore body.  | The second box from the top states that materials will be screened for potential human and environmental impacts, including to the trona ore deposit. The statement in the fifth box has been revised for clarity as follows: "For materials being considered for BACM, coordinate with the District so that pilot tests achieve BACM testing goals. Materials to be used only on roads and berms, or for temporary dust control, <u>would not need to be coordinated with the District in order to achieve BACM testing goals.</u> "   |
| 335 | Rio Tinto   | In section 5-7, Lines 9-10 discusses the use of ground water and that could contribute to the water conservation target.<br><br>I believe this could unnecessarily the limit amount of high quality water in the water savings target. As discussed during the November 16th conference call I thought we decided (Bob Harrington's clarification) that any Owens Lake groundwater contribution to dust control would be more appropriately discussed in the water supply section, not under water conservation.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter        | Comment   | Status/Response   |
|-----|------------------|---|---|
| 336 | Steve McLaughlin | p. 4-19, lines 3-4. "These proposed measures (immediate response stabilization measures) could be deployed within existing dust control areas." This seems to me to need more explanation. In what circumstances would such measures be used—presumably when the existing DCM fails to achieve the "99 percent control efficiency" despite meeting the "performance efficiency specifications" (p. 4-6, section 4.2.2)? Would the response stabilization measures be applied even if they resulted in lowering the value-acres of the cell? | The text has been clarified to state: "Immediate response stabilization measures could be deployed quickly in <u>uncontrolled</u> dust source areas to control emissions and to prevent the areas from expanding. These proposed measures could be deployed <u>outside</u> existing dust control areas, <u>in areas owned by or under lease to LADWP.</u> " With regard to the HSM, this comment is noted. Immediate response stabilization measures were not specifically considered by the Habitat Working Group; however, within the monitoring and adaptive management process, lowered values would be identified and managed. |
| 337 | Steve McLaughlin | p. 5-6, lines 7-9 ("The current annual water budget for dust control is approximately 95,000 AFY; actual water use varies depending on conditions during the water year ...."). I would like to see a small Table inserted here, showing by year since Phase 1 both the annual water budget and the actual water use. I'm sure LADWP must have this data.   | Comment noted. This comment is in reference to providing context for the stated water savings target of 50 percent of the annual water budget. Section 4.0, Water Supply, Savings, and Efficiency, has been updated with new text to summarize two technical appendices that outline the determination of the water savings target and its feasibility. As noted in the section and appendices, the water savings target is no longer related to an annual water budget. It is based on the "through Phase 7" average annual water demand.  |
| 338 | Steve McLaughlin | p. 5-7, lines 8-9. I think this is the first use of the words "environmentally sustainable" groundwater use, which are repeated several times further on in the Draft. I would like to see either (1) a precise definition of what "environmentally sustainable" means for groundwater withdrawal, or (2) a statement to the effect that the Planning Committee has not reached a consensus on what "environmentally sustainable" means.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 339 | Steve McLaughlin | p. 6-10, Table 6-3. The last exponent in the Model Equation should be 1/4, not 1/5. The same error occurs on p. F-20.   | This error has been corrected.  |
| 340 | Steve McLaughlin | p. 6-41, Fig. 6-14. It would be very useful to see this generic figure replaced with one more specific to Owens Lake and the Master Plan.   | Comment noted. We recommend this topic may be discussed with the Habitat TAC at a later time.   |
| 341 | Steve McLaughlin | p. 7-1, line 29. Does the "Brady Highway" include the "Aeolian Road" of Fig. 7-1 (p. 7-2)? If not, Aeolian Road should be identified in the text as an access point.  | Figure 5-1, Public Access Points, has been updated and it no longer references Aeolian Road.  |
| 342 | Steve McLaughlin | p. 7-4, line 34. I would insert the word "responsible": "Planning Committee supports the responsible use of OHVs for access to various parts of the lake ...." As written, this sentence appears to directly contradict the previous discussion (lines 12-15) of problems with OHV use on the lake.   | Incorporated.   |
| 343 | Steve McLaughlin | p. 7-21, lines 5-6. There is no reference for the Bettinger and Taylor (1974) citation.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The Cultural Overview was removed because it is no longer applicable. Accordingly, it was not necessary to address this comment; however, we recommend this topic be considered in development of the Master Project and the associated CEQA document.   |
| 344 | Steve McLaughlin | p. 7-26, lines 4-6. I don't understand this bullet point. How does grazing compensate for impacts on habitat from a renewable energy project?   | Text has been revised for clarity to state: "Projects should avoid areas where there is a high level of existing or potential habitat. <u>In marginal habitat areas, projects should consider the opportunity for grazing as a compatible land use.</u> "   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter   | Comment  | Status/Response   |
|-----|---|--|---|
| 345 | Steve McLaughlin  | p. 8-2, lines 3-4. Why are grazers excluded as potential project proponents? If there are opportunities (and funding) for projects to reduce grazing impacts while improving habitat in TAM, these should be encouraged and evaluated by the same review process.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 346 | Steve McLaughlin  | p. 8-3, line 19. Can the "subcommittee of the Advisory Committee" be defined more explicitly? When will it be formed? If membership on this subcommittee is left to the first meeting of the Advisory Committee, there could be a long delay before the Master Plan Coordinator is actually on-board.  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 8.0, Implementation, of the 2011 Draft Master Plan was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 347 | Steve McLaughlin  | p. 8-4, lines 17-19 explicitly state that there will be a Habitat TAC and a Public Access, Education, and Recreation TAC. The role of the former is specifically addressed in Chapter 6, but I don't think Chapter 7 even mentions the latter. What will it do?  | The following text was added: " <u>Development of the Interpretive Plan is subject to funding and would occur with oversight from a Public Access and Recreation TAC. The Public Access and Recreation TAC will likely include LADWP, the Commission, Lone Pine Paiute-Shoshone Reservation, Eastern Sierra Audubon Society, Eastern Sierra Interpretive Association, Inyo County, US Forest Service, and local residents. Roles and responsibilities of the Public Access and Recreation TAC may include, but not be limited to, providing oversight during development of the Interpretive Plan, identifying funding opportunities, and facilitating implementation of the Interpretive Plan.</u> " |
| 348 | Steve McLaughlin  | p. B-3, lines 11-12. Is the concept of a "wildlife sanctuary" still valid?   | The Vision Statement was developed by the Planning Committee in 2010 at the start of the master planning process. The concept of the wildlife sanctuary is no longer valid; however, the Vision Statement was not revised because it was adopted by the Planning Committee "as is."   |
| 349 | Steve McLaughlin  | p. F-11. I know I've asked this before, but why aren't American Coots included anywhere? I would have put them in the Diving Waterbird Guild. Gary Page raised the same question, and suggested including them in the Waterfowl Guild (pp. G-3, G-4).  | According to the avian specialist in the Habitat Working Group, American Coots are such generalists that they could be found in any of the bird-centric habitats. Therefore, this species is not specifically mentioned.  |
| 350 | Steve McLaughlin  | p. F-36 discusses the problems of "large monocultures" of tamarisk, but the model mentions only "presence" of tamarisk (Table 6, p. F-39). Do we really want to subtract 0.3 from the Vegetation Richness SIV if a single tamarisk is present? Probably something the Habitat Work Group or Habitat TAC needs to discuss.  | Comment noted. We recommend this topic may be discussed with the Habitat TAC at a later time.   |
| 351 | Steve McLaughlin  | p. F-50. Last sentence of the second paragraph; Comments from the Review Panel are found in Appendix G.  | Incorporated.   |
| 352 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | Page 1-1, Line 24, states that Los Angeles Department of Water and Power (LADWP) is providing water to 4 million customers. That may be the case, but it is out of sync with the rest of the paragraph. The rest of the paragraph is speaking about historical use of Owens River water and the next paragraph is speaking about the impact of diversions by 1930. LADWP may currently have 4 million customers, but when the lake was drained they had much fewer customers. A similar sentence is given on page 5-1, Line 8 which has a much better context. | Comment noted. The sentence was deleted.  |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter   | Comment   | Status/Response   |
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| 353 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | On page 2-2, Lines 18-23, it states that LADWP did a water demand evaluation and determined that it could reduce its application of dust mitigation water by 50% of the current needed amount (95,000 acre-feet). The evaluation, according to page 5-6, line 16-17, appears in Appendix E. Appendix E is a short memo and a Power Point presentation. This information should allow readers to understand how LADWP and their consultants came up with the 50% reduction. It is unclear in the draft Master Plan if the implementation of this Plan will require a 50% reduction of water use on the lake or if it is merely a goal of one of the stakeholders. On page 4-17, Lines 3-4, it is implied that the 50% reduction in water use is a requirement for the Plan and not merely for one stakeholder. Also, since the 50% reduction is based primarily on the approval of new or modified BACM, what happens to the Plan or this goal if no new or modified BACM are approved?  | The Habitat Working Group met to discuss the water target on September 10 and October 22, 2012. Agreement on the target was reached at the October 30, 2012, Agency Forum, and the January 28, 2013, Planning Committee meetings. This target reflects the consensus of the Planning Committee. The section and appendix have been augmented to describe how the target was established and feasibility was determined. |
| 354 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | On page 5-6, Line 13 it says that water conserved at Owens Lake would be available for other beneficial uses. The term beneficial uses needs to be defined. According to the State Water Resources Control Board the following beneficial uses were developed and recommended for use in basin planning documents: Agricultural Supply; Aquaculture; Preservation of Biological Habitats of Special Significance; Cold Freshwater Habitat; Commercial and Sportfishing; Flood Peak Attenuation/Flood Water Storage; Freshwater Replenishment; Ground Water Recharge; Industrial Service Supply; Migration of Aquatic Organisms; Municipal and Domestic Supply; Navigation; Hydropower Generation; Industrial Process Supply; Rare, Threatened, or Endangered Species; Water Contact Recreation; Noncontact Water Recreation; Inland Saline Water Habitat; Spawning, Reproduction, and Development; Warm Freshwater Habitat; Wildlife Habitat and Water Quality Enhancement. <a href="http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml">http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml</a> The Tribe questions whether the Lahontan Regional Water Quality Board has been involved in the water quality and beneficial use aspects of the Master Plan. | Comment noted. The text has been updated to state: "...available for other beneficial uses, <u>as defined by law and as subject to water rights.</u> "  |
| 355 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | Page 5-7, line 8-10, states that the use of groundwater for dust control will contribute to the "water conservation" target. This paragraph does not explain how using groundwater will assist in meeting the "water conservation" target. It is not logical that use of groundwater is equivalent to reducing water usage or using water more efficiently.   | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 356 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | Page 5-7, Section 5.3 describes the groundwater studies at Owens Lake. This section as written is too vague. A meeting held on January 20, 2012, at the LADWP offices in Bishop described in more detail the degree to which Owens Lake springs may be diminished or destroyed by groundwater pumping. Why was this information not placed within this section? On Line 19 it states a vague term "environmentally sustainable groundwater yield" which needs to be defined in this Plan. This section should describe the purpose of groundwater pumping, how much water is planning to be pumped, what impact the pumping will have on the environment, and, as described in the paragraph above, how all of that will reduce water use on the lake. This section needs to be removed or rewritten to include pertinent information.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.  |
| 357 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | On page 7-21, Section 7.3.2.3 the section describes various aspects of the Owens Valley Paiute including population, culture and food, but neglects to share the connection between the Paiute and Owens Lake.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The Cultural Overview was removed because it is no longer applicable. Accordingly, it was not necessary to address this comment; however, we recommend this topic be considered in development of the Master Project and the associated CEQA document.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter   | Comment   | Status/Response   |
|-----|---|---|---|
| 358 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | The Tribe previously submitted a letter, dated May 11, 2011 (attached), objecting to minimizing water deliveries to Owens Lake as a part of the Master Plan goal. Owens Valley waters sustained the lake prior to diversion activities. The Tribe does not agree the Planning Committee should adopt a policy to minimize water deliveries to Owens Lake, because this would serve only to benefit the City of Los Angeles, and no such policy exists currently. Also, the Tribe reiterates its concern about a lack of a clear definition of the phrase, "water conservation." The draft Master Plan, like previous documents, fails to provide an adequate definition of "water conservation." In fact, in reading the draft Master Plan, the phrase is used in contexts conveying different meanings, but the predominant usage indicates that water conservation equates with increased exports of water out of Owens Valley via the LA Aqueduct. | Comment noted. This topic was addressed in a letter from the Planning Committee to the Tribe on June 20, 2011. As noted in the letter, water savings is a goal that the Planning Committee identified and accepted within the context of habitat enhancement. Regarding the definition of water conservation, the term "water conservation" was replaced with "water savings and efficiency" throughout the document (consistent with the Planning Committee recommendation at the February 15, 2012, meeting). Water savings is defined as using less LAA water on Owens Lake, and water efficiency is defined as producing more dust control and habitat value per acre-foot of water used on the lake bed. |
| 359 | Stakeholder - Big Pine Paiute Tribe of the Owens Valley | The Owens Lake Master Plan should describe in detail the condition of the Owens Lake ecosystem prior to diversion. The draft Plan mentions the drying of Owens Lake and the current biological resources in the planning area, but does not describe biological resources which were present prior to the draining of Owens Lake. It is important to describe Owens Lake as a body of water which supported biological resources because that is what it was to the ecosystems and to the Native Americans for thousands of years before water from the Owens River was diverted to the aqueduct. The Plan needs to provide a stronger context with regard to what has been lost by the desiccation of Owens Lake so that those reading the Plan can see that the activities now occurring are in response to a prior decision to remove a lake from existence.   | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document.   |
| 360 | Stakeholder - Ceal Klinger                              | 1. The word "conservation" in the Owens Lake Master Plan ("the Plan") should be clearly defined, and its use should be confined to appropriate contexts.<br>Will the amount of water "saved" from being used on the lake be preserved, i.e., will it be allowed to remain in creekbeds, drainages, groundwater reserves, or other natural waterways, or the water "saved" from being used on the lakebed be exported for other uses?  | The term "water conservation" was replaced with "water savings and efficiency" throughout the document (consistent with the Planning Committee recommendation at the February 15, 2012, meeting). Water saved would be available for other beneficial uses, as defined by law and as subject to water rights. A new Section 4.3, Excess Water and County of Inyo, was added to describe the potential of delivering excess water to the county during wet years.  |
| 361 | Stakeholder - Ceal Klinger                              | The distinction between water conservation versus efficient use of water should be clarified throughout the plan, especially since the word "conservation" is used in its more traditional and accepted sense in chapter 3 (where it is used to describe conservation of natural resources, e.g., page 3-16 line 36 and page 3-17 line 2) and in chapter 5 (where "water conservation" is used to describe, for example, "cost-effective reductions in water use" [emphasis added] on page 5-4, lines 4-5).   | The term "water conservation" was replaced with "water savings and efficiency" throughout the document (consistent with the Planning Committee recommendation at the February 15, 2012, meeting).   |
| 362 | Stakeholder - Ceal Klinger                              | 2. The Master Plan's environmental impacts outside the project area's boundaries should be clearly described as part of the costs or benefits associated with the Plan.   | Comment noted. The document is no longer a Master Plan. The Final Report documents the consensus of the Planning Committee during the master planning process. This comment is no longer applicable; however, we recommend this comment be considered during development of the Master Project and its CEQA analysis.   |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                   | Comment   | Status/Response   |
|-----|-----------------------------|---|---|
| 363 | Stakeholder - Ceal Klingler | <p>1. Additional insects encountered in transmontane alkali meadow (see page 3-17, lines 26-27) include but are not limited to members of the following orders and families (pers. obs., C. Klingler, 2006-2012):</p> <ul style="list-style-type: none"> <li>• Order Coleoptera (beetles): Families Cantharidae, Cerambycidae (e.g., <i>Xylotrechus insignis</i>), Chrysomelidae (e.g., <i>Chrysochus cobaltinus</i>), Cleridae (e.g., <i>Enoclerus laetus</i>), Curculionidae (e.g., <i>Merhynchites</i> species), Meloidae (e.g., <i>Tegrodera latecincta</i>), Melyridae, and Rhiphoridae.</li> <li>• Order Diptera (flies): Families Bombyliidae, Syrphidae, Tachinidae, Tephritidae, and Tipulidae, among others.</li> <li>• Order Hemiptera (true bugs): Families Aphididae, Cicadidae, Coreidae, Lygaeidae, Miridae, Pentatomidae, Reduviidae, and Scutelleridae, among others.</li> <li>• Order Hymenoptera (ants, bees, wasps, sawflies): Families Formicidae (e.g., <i>Pogonomyrmex</i> species, which play an important role in both endemic plant distribution and as food for desert horned lizards), Andrenidae, Apidae, Megachilidae, Halictidae, Mutillidae, and Vespidae, among others.</li> <li>• Order Lepidoptera (butterflies and moths): Families Hesperidae, Lycaenidae, Nymphalidae, Papilionidae, Sesiidae, Noctuidae, and Sphingidae, among others.</li> <li>• Order Neuroptera (antlions, lacewings, and others): Family Raphidiidae, among others.</li> <li>• Order Odonata (dragonflies and damselflies): Families Coenagrionidae, Lestidae, Aeshnidae, Gomphidae, and Libellulidae, among others.</li> <li>• Order Orthoptera (grasshoppers, crickets, and katydids): Acrididae and Gryllidae, among others.</li> </ul> | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 364 | Stakeholder - Ceal Klingler | <p>2. Transmontane alkali meadow also supports arachnids (see page 3-17, lines 29-30) in the following orders and families (pers. obs., C. Klingler, 2006-2012):</p> <ul style="list-style-type: none"> <li>• Order Acari: Families Tetranychidae and Trombididae, among others.</li> <li>• Order Araneae: Families Aglenidae (funnel weavers), Areneidae (orb weavers), Corinnidae, Gnaphosidae, Oxyopidae, Lycosidae, Salticidae, Theridiidae, Thomisidae, and Philodromidae, among others.</li> </ul>  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |
| 365 | Stakeholder - Ceal Klingler | <p>3. Note regarding Great Basin spadefoot toads (<i>Spea intermontana</i>) (see p. 3-18, line 4): Great Basin spadefoot toads (<i>Spea intermontana</i>) have been observed north of the Owens Lake (Flaxington, 1996) and east of the Owens Lake, as well as in and around Lone Pine (Macey and Papenfuss, 1991). They have also been observed elsewhere in degraded alkali meadow habitat in Inyo County (pers. obs., C. Klingler, 2011) and near springs associated with Mono Lake (pers. obs., C. Klingler, 2009). It is highly likely that they live within the region encompassed by the Master Plan.</p>  | The Final Report documents the consensus of the Planning Committee during the master planning process. Section 3.0, Physical and Biological Conditions at Owens Lake, of the 2011 Draft Master Plan was omitted from the Final Report because it was no longer applicable. Accordingly, it was not necessary to address this comment. We recommend this comment be considered during development of the Master Project and its CEQA document. |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                      | Comment  | Status/Response  |
|-----|--------------------------------|--|--|
| 366 | Stakeholder - Ceal Klinger     | <p>1. "Environmentally sustainable" (page 5-7, line 19) should be clearly defined. In the case of groundwater pumping from the lakebed, sustainability also should be examined not only in terms of how much spring flow might be reduced among springs surrounding the lake but also in terms of how reductions in spring flow will affect:</p> <ul style="list-style-type: none"> <li>• Soil moisture, particularly in terms of its 1) availability to invertebrates such as beetle larvae (which may remain underground for ten years or longer and thus are intimately affected by drops in water tables), and 2) availability to vertebrates such as Great Basin spadefoot toads, which remain buried beneath the soil many months per year, must absorb moisture through their skin, and are directly affected by changes in soil moisture as well as changes in water tables.</li> <li>• Above-ground plants and wildlife.</li> </ul> <p>While drops in spring flow might be viewed as "sustainable" in strictly mechanical terms (a decrease in flows may continue for many years without causing a cease in flows, "environmentally sustainable" should be considered in terms of biological effects rather than mechanical ones. Otherwise, a decrease in spring flow would be "sustainable" even when all life has been extirpated from a spring.</p> | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 367 | Stakeholder - Ceal Klinger     | <p>2. "Environmentally sustainable" should also be considered in terms of the project's effects on habitats lying outside the project area.</p>  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 368 | Stakeholder - Ceal Klinger     | <p>3. "Safe yield" (page 5-7, line 20) should also be clearly defined and described in terms of effects on both nearby biological communities and any effects on biological communities outside the project's boundaries (see 1 and 2 above).</p>  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 369 | Stakeholder - Daniel Pritchett | <p>1. The goals of the Plan (pg 1-9, line 1) are stated using ambiguous language, as are the interests of Planning Committee members (pg 1-7, line 12). These problems arise from the misleading use of the word "conservation" throughout the Plan....Unless the Plan includes an enforceable agreement linking reductions in water use at Owens Lake to reductions in pumping in existing Owens Valley wellfields and ruling out development of new wellfields, the misleading phrase "water conservation" should be removed. Table 1 (below) lists misleading occurrences of "water conservation" along with suggested corrections which specify the purpose of the reduction in water use. [Table 1 suggests changing "water conservation" to "increasing water exports to LA."</p>  | The goals of the master planning process were established by the Planning Committee and are not eligible for revision. The term "water conservation" has been replaced with "water savings and efficiency" throughout the document.  |
| 370 | Stakeholder - Daniel Pritchett | <p>2. Section 5.1 is unnecessary and should be removed. Although DWP's efforts to reduce water consumption in LA are commendable, there is no need for them to be described in the plan, which is already very long. Furthermore, this irrelevant material contains repeated references to "water conservation" which are misleading for reasons noted above in comment 1.</p>   | <p>Not incorporated. The Planning Committee agreed at the February 2012 meeting to include the water supply text as a part of the document because it frames the importance of water savings and efficiency at Owens Lake.</p> <p>The term "water conservation" was replaced with "water savings and efficiency" throughout the document (consistent with the Planning Committee recommendation at the February 2012 meeting). Water savings is defined as using less LAA water on Owens Lake, and water efficiency is defined as producing more dust control and habitat value per acre-foot of water used on the lake bed.</p> |

**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                      | Comment   | Status/Response  |
|-----|--------------------------------|---|--|
| 371 | Stakeholder - Daniel Pritchett | 3. Section 4 discusses the possibilities of changing from one BACM to another and states that "In other words, the SIP does not allow a temporary violation of NAAQS during the transition period [from one BACM to another]" (pg 4-17, lines 22-23). The Plan also states that the Planning Committee supports a SIP amendment to allow temporary NAAQS violations during BACM transitions (pg 4-17 lines 25- 26). Given the contentious history of relations between DWP and GBUAPCD, it is ill-advised to allow even temporary violations of NAAQS for any reasons. The Plan should devise methods for BACM transition which do not lead to any violations of NAAQS. The Planning Committee should rescind its support of a SIP amendment to allow temporary NAAQS violations.   | The Planning Committee agreed to revise the language regarding a SIP amendment at its February 2012 meeting. The new language from the Planning Committee states: "In other words, the SIP does not allow a violation of NAAQS during the transition period. LADWP may pursue a SIP amendment <u>for this purpose. Not all Planning Committee members supported amending the SIP. LADWP would seek an Advisory Committee's input and support on any proposed SIP amendments.</u> " (An Advisory Committee was envisioned during the master planning process; however, it was not established. An Advisory Committee will be established for LADWP's Master Project.) |
| 372 | Stakeholder - Daniel Pritchett | 4. Development of a new wellfield at Owens Lake when existing wellfields in the same watershed are not managed in compliance with the goal of impact avoidance specified in the Inyo-LA Long Term Water Agreement serves neither the interests of justice nor sustainable management. Because of this, a further condition must be added on Page 5-7, Section 5-3, line 28:<br>4) Achieving reduction of long term (1987-present) annual average pumping in existing Owens Valley wellfields to a level demonstrated to protect native groundwater dependent vegetation. Such a level would be below the 70,000 AFY ceiling determined by the USGS (Danskin, W. 1998. Evaluation of the Hydrologic System and Selected Water-Management Alternatives in the Owens Valley, California. United States Geological Survey Water-Supply Paper 2370-H)."  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 373 | Stakeholder - Daniel Pritchett | 5. We assume Page 5-7, lines 20-21, the phrase "would be subject to" to means "would be contingent upon." We suggest changing "would be subject to" to "would be contingent upon" for clarity.  | The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.   |
| 374 | Stakeholder - Robert Pearce    | In reference to comments made in the Appendix D, the CNPS Report Letter regarding grazing impacts on species abundance. There is not sufficient evidence to support the concept that grazing is responsible for absence of SPAL, LETER, POSE, MUAS, or any other palatable species around the lake (see the paragraph below that is from the report). Grazing occurs on many other alkali meadows within Inyo County, and many other alkali meadows throughout the western US, and those species are abundant on many grazed sites. Either the paragraph below that was excerpted from the report needs to be supported by peer reviewed papers, or it should be removed or modified to state the cause of absence of those species is unknown. The author used the word "may" as a qualifier to the statement of cause, but without sufficient evidence to support the possible cause of absence of species there is no need to make suppositions about the cause. Additionally, terms like "Heavy Grazing" need to be defined in terms of stocking rate, season of use, kind of animals, and other descriptive terms. Dependent upon ones background and biases, "Heavy" has very different meanings. | Comment noted. Appendix D is included in the Final Report to identify potential rare plants of a recent review of literature and observations by CNPS. It is not included to support the impact of grazing on plants and it remains an Appendix to the Final Report. Grazing within the planning area is subject to specific grazing management plans for each leasee and may be considered by the Habitat TAC as a part of the Master Project.  |



**Responses to Comments on  
2011 Draft Owens Lake Master Plan  
(Final document title: Report on Owens Lake Master Planning Collaboration)**

| No. | Commenter                   | Comment   | Status/Response   |
|-----|-----------------------------|---|---|
| 375 | Stakeholder - Sally Manning | <p>“Water conservation” is a misleading term used throughout the Master Plan, and it should be deleted. It is one thing for DWP to use water efficiently in its dust mitigation efforts on the lake bed, but I do not agree that the Planning Committee should, or has the authority to, agree to reduced water application on the lake bed as policy or as a “must have” in this Plan. The Plan must not limit the amount of water to be applied now or in the future. No numerical amounts or percentages should be stated in this Plan. If the Plan is adopted, then on an annual basis DWP could propose the amount of water it expects to release to achieve dust control, habitat, and other goals. The necessary amount should not be pre-loaded into the Plan.</p>  | <p>Water savings is a goal that the Planning Committee identified and accepted within the context of habitat enhancement. Regarding the definition of water conservation, the term “water conservation” was replaced with “water savings and efficiency” throughout the document (consistent with the Planning Committee recommendation at the February 15, 2012, meeting). Water savings is defined as using less LAA water on Owens Lake, and water efficiency is defined as producing more dust control and habitat value per acre-foot of water used on the lake bed. Also, the document is a report on the collaboration of the master planning process and it does not establish policy or limit the amount of water to be applied on the lake bed.</p> |
| 376 | Stakeholder - Sally Manning | <p>Section 5.3, page 5-7, describes groundwater pumping. It’s my understanding that LADWP regards pumping on or near the lake bed as a “must-have” for participating in and carrying out their commitments in the Master Plan. If someone on the Planning Committee disagrees with this view, I suggest DWP be asked for an answer, in writing. This section of the Master Plan continues to suggest that DWP will be pumping, and this section is simply a placeholder for some arbitrary limits to pumping, which in reality will probably cause regional groundwater declines, lowered flow at springs, artesian, and seeps, and new areas of dust generation. Groundwater pumping must not be part of the Master Plan: There is no reason to include it.</p>  | <p>The Final Report documents the consensus of the Planning Committee during the master planning process. The topic of groundwater was omitted from the Final Report because the Planning Committee did not reach consensus on this topic. Accordingly, it was not necessary to address this comment.</p>   |
| 377 | Stakeholder - Sally Manning | <p>The first few sentences of the Planning Committee’s Vision Statement, presented in Appendix B are OK (except for the phrase “water conservation”), but when one reads further, there are definite problems with the details. Unfortunately, the less palatable parts of the Vision Statement and Goals are re-stated on pp. 1-8 to 1-9, and I suggest modifications shown.</p> <p>Line 5: Control dust on the Owens Lakebed to achieve excellent air quality and eliminate the dust-related public health risk.</p> <p>Line 1: Water use efficiency shall be considered when implementing dust control efforts on the Owens Lakebed.</p> <p>Line 4-5: Create a Master Plan that can be flexible in the future.</p> <p>Line 8-10: Create a viewshed that is in harmony with the surrounding rural environment</p> <p>Line 12: Explore opportunities for renewable energy development {??}</p> | <p>Comment noted. The goals of the master planning process were established by the Planning Committee and are not eligible for revision.</p>  |
| 378 | Stakeholder - Sally Manning | <p>Section 5.1 of the draft Master Plan concerning water usage in the City of Los Angeles is out of place and inappropriate to include in this document. If the point of the Master Plan is to describe past and current events leading up to the need for this Plan, then an accurate portrayal of LADWP’s desiccation of Owens Valley and Owens Lake needs to be presented. However, this would probably at least quadruple the size of the Master Plan.</p>  | <p>Not incorporated. The Planning Committee agreed at the February 2012 meeting to include the water supply text as a part of the document because it frames the importance of water savings and efficiency at Owens Lake.</p>  |
| 379 | Stakeholder - Sally Manning | <p>I hope the public can expect the context and need for an Owens Lake Bed Master Plan to be part of the EIR/EIS that will need to be prepared and issued on this Master Plan. It concerns me that many individuals and organizations with a real interest in Owens Valley and Owens Lake were unable to participate in the time-consuming planning process. Very few people can make it to an all-day meeting in Keeler, for example. The preparers of the Plan must take this into consideration. When the draft CEQA/NEPA documents are prepared, the public is going to need an extended time period for review of this complicated Master Plan.</p>  | <p>Comment noted. The document is no longer a Master Plan. The Final Report documents the consensus of the Planning Committee during the master planning process. This comment is no longer applicable. However, it is important to note that environmental impacts associated with projects on the lake bed will be considered in CEQA analyses when such projects are proposed.</p>   |

Responses to Comments on  
 2011 Draft Owens Lake Master Plan  
 (Final document title: Report on Owens Lake Master Planning Collaboration)

| No. | Commenter           | Comment   | Status/Response   |
|-----|---------------------|---|---|
| 380 | Stakeholder - USFWS | The 2011 Draft Plan (p. 7-26) says [Renewable energy] "Projects should avoid areas where there is a high level of existing or potential habitat." When it is not possible to avoid existing habitat, the project should consider the opportunity for grazing. This second sentence is unclear. Does it mean consider grazing instead of siting renewable energy projects there, construct and operate renewable energy projects and graze on site and nearby, or something else? In the first sentence, does existing or potential habitat mean wildlife habitat or migratory bird habitat? Perhaps the use of habitat in the document is defined elsewhere.  | Text has been revised for clarity to state: "Projects should avoid areas where there is a high level of existing or potential habitat. <u>In marginal habitat areas, projects should consider the opportunity for grazing as a compatible land use.</u> "   |
| 381 | Stakeholder - USFWS | Because much of the Owens Lake is proposed for managing habitat for migratory birds, the renewable energy section should clearly state that some forms of renewable energy are not compatible with migratory birds. Current forms of wind and some forms of solar that include thermal applications, require ponds, or have reflective surfaces can cause injury or death to migratory birds. In addition, avoiding areas where there is a high level of existing or potential habitat is not necessarily adequate to avoid impacts to migratory birds. A wind energy project could be located a few to several miles away from migratory bird habitat but still result in injury or mortality. A solar energy project with cooling ponds would attract migratory birds and result in injury or mortality from salt toxicosis at the pond. Other solar thermal technology uses reflecting mirrors to heat a source on a tower centrally located in the solar field. Birds have died from collisions with mirrors and the towers. The mirrors may also be focused on standby points, areas of sky around the tower. Birds have died from being burned in the standby points (McCrary et al. 1986 -Journal of Field Ornithology 57(2):135-141). A summary of the impacts of solar energy projects is available in the DPEIS for solar energy prepared by the BLM and Department of Energy. I urge you to clarify in the Plan those forms of renewable energy that would be acceptable with the other management uses at Owens Lakebed including migratory bird habitat. | All potential renewable energy projects would be subject to environmental review. Additional text has been added as follows: " <u>All projects would be subject to applicable environmental review, permitting, and leasing. Environmental review would include an evaluation of potential impacts on migratory birds.</u> "  |
| 382 | Stakeholder - USFWS | Also monitoring should be an integral component of any renewable energy project during construction and operation to determine effects on the human environment.  | All potential renewable energy projects would be subject to environmental review and any identified construction and operation monitoring requirements. Additional text has been added as follows: " <u>All projects will be subject to applicable environmental review, permitting, and leasing. Environmental review would include an evaluation of potential impacts on migratory birds.</u> " |