Chapter 7. Errata to the Draft Environmental Impact Report

INTRODUCTION

The following statements constitute errata to the draft EIR to correct errors, improve explanations, or otherwise modify information, based on the comments submitted on the draft EIR.

None of these changes constitute significant new information. These errata are important factual changes, but none of them require reevaluation of the conclusions of the draft EIR.

CHANGES TO THE DRAFT EIR CHAPTERS

Summary

On page S-7, last paragraph, add: "To the extent that the proposed project would add to the impacts of the city's diversions since 1941, or the two projects would jointly contribute to adverse impacts, those cumulative impacts are adverse impacts on the environment, which must be avoided or mitigated to the extent feasible, for purposes of CEQA. Even where the proposed project would reduce the impacts of the city's diversions since 1941, analysis of the net or cumulative effect of the city's diversions since 1941 and continued diversion as would be authorized under the proposed project is useful in determining what actions are appropriate to protect the public trust. Both kinds of cumulative impacts are identified, and mitigation measures are proposed, in this EIR."

On Table S-1, page 5 of 15, the entry under column "Effect on Parker and Walker Creeks" and for row "Point of reference" should be changed from "NA" to "Dewatered".

On Table S-1, page 6 of 15, replace with the revised table herein.

On Table S-2. First entry under "Vegetation", delete Rush Creek.

Chapter 1. Introduction

No changes are needed.

Chapter 2. Project Alternatives and Points of Reference

On page 2-27, after the first paragraph under "Basis in CEQA" add:

"Under CEQA, the focus of review is on the action proposed to be undertaken and on changes in existing physical conditions that will be affected by the proposed action, in this case amendment of the city's licenses. For purposes of CEQA, the impacts of other diversions are not cumulative impacts of the proposed project water right license amendments being considered by the SWRCB unless the proposed amendments would add to or otherwise jointly contribute to the impacts of the other diversions. To the extent that the water rights under review have individually or cumulatively harmed public trust uses, however, those impacts must be considered for the purpose of applying the public trust and reasonableness doctrines, even if the water right amendments ultimately adopted by the SWRCB do not make those public trust impacts any worse. This EIR discloses cumulative impacts and sets forth possible mitigation measures, both for purposes of CEQA analysis and for disclosure of previous and potential future changes in the environment that are relevant to public trust analysis.

Except under the No-Restriction and 6,372-Ft Alternatives, which would allow further reductions in Mono Lake elevations, none of the alternatives considered in this EIR would add to the adverse environmental impacts that have occurred as a result of the city's diversions since 1941, aside from possible further land use impacts from reductions in irrigated lands for grazing (at the discretion of LADWP). If an alternative would not add to or otherwise jointly contribute to adverse impacts of the city's diversions since 1941, the discussion of cumulative impacts and possible mitigation measures provides environmental information relevant to the SWRCB's review and modification of the water rights held by the City of Los Angeles, but does not constitute identification for purposes of CEQA of significant adverse impacts of the alternatives under consideration by the SWRCB."

Chapter 3A. Environmental Setting, Impacts and Assessments, and Methodology - Hydrology

On page 3A-15, first paragraph, delete last sentence.

Chapter 3B. Environmental Setting, Impacts, and Mitigation Measures - Water Quality

No changes are needed.

Chapter 3C. Environmental Setting, Impacts, and Mitigation Measures - Vegetation

Most of the errata for this chapter are needed to correct minor errors in the draft EIR. A planned pre-publication review by a designated technical expert was precluded by the deadline for release of the draft report and other commitments made by the reviewer.

On page 3C-3, 3rd paragraph, 1st sentence, change to "Pumice Valley is the eroded river-delta lakebed of Pleistocene Lake Russell."

On page 3C-3, replace the 4th paragraph with the following: "Below the narrows, Rush Creek flows through the `bottomlands,' a wide, gently sloping valley filled with stream alluvium. (This filling occurred during wetter times of the prehistoric period, when Mono Lake rose into the valley, causing Rush Creek to deposit its delta in the bottomlands.)"

On page 3C-4, "Persistence of Summer Flows", change 2nd sentence to "... some reaches of the first three of these streams...".

On page 3C-5, the 1st paragraph after bullets, 1st sentence, delete "or the Narrows" and change "in 1930-35" to "between 1930 and 1934".

On page 3C-5 under "Channel Stability", delete 1st sentence.

On page 3C-6, 1st three paragraphs, change "incision" to "incision and channel widening".

On page 3C-6, 5th paragraph, change last clause to ". . . but continue to carry flows during the prediversion period."

On page 3C-7, under "Rush Creek", add to 1st sentence as follows: "Riparian vegetation conditions on Rush Creek were altered before the LADWP diversion period by *intensive sheep grazing, diversions for power production*, construction of Grant Lake reservoir, irrigation diversions to Pumice Valley and Cain Ranch, and the emergence of irrigation water at springs in the Rush Creek bottomlands."

On page 3C-7, under "Rush Creek", 2nd paragraph, 4th sentence, change to "Raising the dam eliminated approximately 90 acres of wetland and riparian vegetation. . . ."

On page 3C-10, under "Wilson Creek", change 3rd sentence to read "The increased flow and lake-level lowering cause significant channel incision" and change "Highway 31" to "Highway 167".

On page 3C-11, paragraph 6, sentence 2, replace "along the lake's west shore" with "along portions of the western, southern, and northern shorelands".

On page 3C-11, paragraph 6, last sentence (continues on page 3C-12), replace with: "Groundwater is discharged along the Mono Lake shorelands because gravity carries water downslope in shallow aquifers or along faults or because pressurized artesian water wells up from deep aquifers along faults and discharges as terrestrial springs along the shorelands or as underwater springs."

On page 3C-12, paragraph 2, second bullet, insert "rock fractures and joints" after the word "fault" on the third line of the bullet.

On page 3C-12, paragraph 5, sentences 2 and 3, replace with: "It develops on gently sloped lands composed of lakebed sediments. There, saline groundwater is drawn to the surface by capillary action and evaporates, leaving a salt residue that can develop into a thick powder or crust called `efflorescence'. The efflorescence is dissipated by wind and rain storms but continuously reforms as long as the saline groundwater persists. Gentle water table slopes and moderate to slow soil permeability prevent the water table from draining rapidly (Appendix Q)."

On page 3C-14, paragraph 5, sentence 1, change the total extent of wetlands to 748 acres and the total extent of marsh, wet meadow, alkali meadow, and wetland scrub habitat to 489 acres (see the response to Comment C2 in Chapter 4, "Major Issues and SWRCB Responses", for an explanation of the change).

On page 3C-15, paragraph 4, sentence 1, replace the first part of the sentence with: "The Rush Creek delta supported 38 acres of natural lagoon wetland and 133 acres of wet meadow and marsh wetland, and the Wilson and Lee Vining Creek . . ." (continue as in text).

On page 3C-21, last paragraph, sentence 2, add: "1986".

On page 3C-22, 4th full paragraph, change date in 1st sentence from "1985" to "1984".

On page 3C-23, change 1st sentence to "The potential maximum incision, or fall of the lake surface below the elevation of the stream delta plain, has increased from 13 feet during the floods of the 1960s to 24 feet at the point of reference."

On page 3C-23, 2nd paragraph, change "flows damaging to streambeds" to "flows damaging to streambanks".

On page 3C-25, 1st sentence, change date to "1984".

On page 3C-26, last paragraph, 1st sentence, change to "Since 1989, several channel modifications and revegetation projects have been implemented. . . ."

On page 3C-27, under "Post Office Creek", change "27 acres" to "2.7 acres".

On page 3C-27, under "Mill Creek", 1st paragraph, last sentence, change "severely incised" to "incised".

On page 3C-27, next to last line, change "6,420-foot elevation" to "6,428-foot elevation".

On page 3C-28, paragraph 3, first sentence after the bullets, change the total the lake fell to 45 feet, not 41 feet, and change to state there were four major lake transgressions, not three.

On page 3C-29, paragraph 1, sentence 1, add one additional springline at the 6,402-foot contour, which was formed by the transgression of 1958.

On page 3C-29, paragraph 2, last sentence, add the following to the end of the sentence: "... causing the streams to incise".

On page 3C-31, paragraph 2, sentence 1, revise to read that there was a net increase of 142 acres of vegetated wetland, over the 193 acres that existed before diversions (see the response to Comment C2 in Chapter 4, "Major Issues and SWRCB Responses", for details).

On page 3C-42, paragraph 4, sentence 2, delete the following phrase from the end of the sentence: ". . . and throughout the basin".

On page 3C-42, paragraph 4, sentence 3, clarify that streams will incise only after lake regression *if* the exposed lands are of a steeper gradient than the stream's equilibrium gradient.

On page 3C-42, paragraph 4, sentences 4 and 6, replace the word "terraces" with "lands".

On page 3C-42, paragraph 5, second bullet, note that this assumption applies only if the historical springs were not the result of irrigation contributions to groundwater that have subsequently been eliminated.

On page 3C-42, paragraph 5, third bullet, replace the phrase "normal maximum elevation" with "absolute maximum elevation".

On page 3C-43, paragraph 1, last bullet, replace the portion of the sentence following the comma with: "except for those portions of the few wetlands that are protected by natural grade control structures created by tufa-cemented strandlines and beaches (e.g., Simon Springs, Wilson Creek delta, South Tufa)".

On page 3C-53, 2nd full paragraph, change "No-Diversion Alternative" to "No-Restriction Alternative".

On page 3C-53, next-to-last paragraph, 2nd sentence, change "sufficient" to "insufficient".

On page 3C-56, paragraph 2, sentence 2, change ". . . rapidly leach lakebed sediment" to ". . . rapidly leach solutes from lakebed sediments".

On page 3C-58, paragraph 6, last sentence, note that the area of lake-fringing wetland would *increase* gradually (not decrease) until the lake reached 6,368 feet.

On page 3C-58, paragraph 7, sentence 3, delete "under" and change the last word of the sentence to "length" instead of "area".

On page 3C-61, add sentence to all of the "Mitigation Measures" paragraphs: "These measures would have visual effects, which may or may not be considered adverse; these effects should be considered on a case-by-case basis in selecting the appropriate mitigation measures."

On page 3C-62, paragraph 4, sentence 3, change to read: "At the high stand for this alternative, the lake would advance . . .".

On page 3C-69, paragraph 4, sentence 2, replace the second sentence with: "Lagoon formation could take 100 or more years to form after dynamic equilibrium began because the deeply entrenched creek channel would have to partially fill (Stine pers. comm.). This lagoon would, however, persist only until the channel had completely filled, at which point it would disappear or substantially diminish in size."

On page 3C-72, paragraph 2, sentence 2, replace with: "Lagoon formation could take 100 or more years to form after dynamic equilibrium began because the deeply entrenched creek channel would have to partially fill (Stine pers. comm.). This lagoon would, however, persist only until the channel had completely filled, at which point it would disappear or substantially diminish in size."

On page 3C-77, paragraph 7, sentence 2, add the following to the end of the sentence: "... but would be substantially faster than under the 6,410-Ft Alternative because less sediment would be required to fill the upper (and therefore narrower and shallower) portions of the deltas trench".

On page 3C-81, last paragraph, sentence 2, change "11,000 feet" to "5,000 feet".

On page 3C-82, paragraph 1, sentence 2, change the number "360" to "493" (see the response to Comment C2 in Chapter 4, "Major Issues and SWRCB Responses", for an explanation).

On page 3C-84, under "Past Gravel Extraction", change sentence 2 to read: "By 1967, the westside quarry . . .".

On page 3C-85, after "Present Interim Stream Restoration", change "LADWP" to "RTC".

On pages 3C-87 through 3C-89, in the "Significant Cumulative Adverse Effects" section, under "Lake-Fringing Wetlands", the acreage tradeoff should be between alkali lakebed and "lake" rather than "littoral" habitat.

On page 3C-91, paragraph 3, replace sentence 3 with: "A mitigation monitoring program is not provided in this document. If the SWRCB incorporates mitigation into the project to avoid or mitigate a significant adverse impact of the project on the existing environment, CEQA requires the SWRCB to adopt a reporting or monitoring program at the time it adopts or approves the project. If restoration is required to address public trust impacts of the city's diversions since 1941, and not to mitigate any adverse changes caused by the SWRCB's amendment of the city's water right licenses, a reporting or monitoring program would also be desirable."

On page 3C-93, under "Renovate the A-Ditch for Floodflow Spreading" add the following: "Severe erosion could result from such discharges. Use for irrigation is unreasonable, however, because 30 acre-feet of water per acre per year was historically required to grow pasture."

On page 3C-94, under "Plant Woody Riparian Vegetation Onsite", add to 1st sentence "... where such vegetation occurred naturally".

On page 3C-94, add mitigation measure: "Rewater Mill Creek. The feasibility of rewatering Mill Creek and its likely effect on riparian vegetation could be examined as a means to provide offsite compensation for losses of riparian vegetation."

On page 3C-94, paragraph 7, sentence 1, change "littoral" to "lake".

In Table 3C-10, add "low" and a footnote "g" to bank erosion potential for the prediversion conditions: "Based on absence of significant erosion during the floods of 1938, the prediversion erosion potential of these streams was probably low."

Chapter 3D. Environmental Setting, Impacts, and Mitigation Measures - Fishery Resources

Table S-1, page 6 of 15, is revised as included herein.

On page 3D-1, paragraph 1, revise sentence 1 as follows: "Mono Lake is a highly alkaline, saline lake that does not provide suitable habitat for fin fish."

On page 3D-5, paragraph 1, revise sentence 1 as follows: "Peak flows in Rush Creek during the snowmelt runoff period often reached 175 cfs under the influence of Southern California Edison's (SCE's) reservoir operations, although flows of more than 300 cfs occurred in wet years."

On page 3D-6, paragraph 4, revise sentence 6 as follows: "These springs and the associated high water table in the meadows supported dense stands of cottonwood and willows covering more than 150 acres (Stine 1991)."

On page 3D-14, paragraph 3, revise sentence 4 as follows: "In upper Lee Vining Creek, peak flows (June) range from 40 to 350 cfs, while low flows (October-April) range from 10 to 97 cfs (Jones & Stokes Associates 1993)."

On page 3D-14, paragraph 5, replace sentences 3 and 4 with: "Higher minimum-flow requirements were established in 1989 when the El Dorado County Superior Court entered a preliminary injunction requiring LADWP to allow sufficient water to pass its diversion facilities on Lee Vining Creek (and Rush Creek) to maintain the level of Mono Lake at or about 6,377 feet. This injunction specified water to be released into Lee Vining Creek at 60 cfs or at the rate of inflow into LADWP's diversion facility, if it is less. In June 1990, pursuant to the Caltrout I and Caltrout II decisions, the El Dorado County Superior Court entered a preliminary injunction establishing interim flow rates for Lee Vining Creek of 35 cfs from April through September, 25 cfs from October through March, and a spring channel maintenance flow of 160 cfs for 3 days every below-normal runoff year or for 30 days every normal to above-normal runoff year in even-numbered years only. In April 1991, the Court issued a preliminary injunction that requires LADWP to allow sufficient water to pass its diversion facilities to maintain the level of Mono Lake at or above 6,377 feet; the Court noted that the extra 60,000 af required by the June 1990 order would not sustain the level of Mono Lake at 6,377 feet."

On page 3D-15, paragraph 6, revise sentence 2 as follows: "The upper boundary of Segment 4 marks the beginning of an incised delta that extends to Mono Lake."

On page 3D-15, last paragraph, revise sentence 1 to "Segment 5 . . . is devoid of tall riparian vegetation and. . . ".

On page 3D-17, paragraph 6, revise sentence 1 as follows: "In 1970, increases in Rush Creek and tributary diversions virtually dewatered lower Rush Creek in subsequent years, except during times of exceptionally high runoff."

On page 3D-18, paragraph 3, replace sentences 2 and 3 with: "Higher minimum-flow requirements were established in 1989 when the El Dorado County Superior Court entered a preliminary injunction requiring LADWP to allow sufficient water to pass its diversion facilities on Rush Creek (and Lee Vining Creek) to maintain the level of Mono Lake at or about 6,377 feet. This injunction specified water to be released into Rush Creek at a rate between 85 and 100 cfs or at the rate of inflow into LADWP's diversion facility, if it is less. In June 1990, pursuant to the Caltrout I and Caltrout II decisions, the El Dorado County Superior Court entered a preliminary injunction establishing interim flow rates for Rush Creek of 40 cfs

from April through September, 28 cfs from October through March, and a spring channel maintenance flow of 165 cfs for 3 days every below-normal runoff year or for 30 days every normal to above-normal runoff year in even-numbered years only. In April 1991, the Court issued a preliminary injunction that requires LADWP to allow sufficient water to pass its diversion facilities to maintain the level of Mono Lake at or above 6,377 feet; the Court noted that the extra 60,000 af required by the June 1990 order would not sustain the level of Mono Lake at 6,377 feet."

On page 3D-18, paragraph 5, revise sentences 2 and 3 as follows: "Detailed habitat mapping was not conducted because the conveyance channel is artificial. This segment, however, was included in Beak Consultants' IFIM study."

On page 3D-23, paragraph 1, revise sentence 3 as follows: "Likewise, flow in the Owens River gorge below Lake Crowley reservoir was eliminated from 1952 to 1991 because of water diversions for power production."

On page 3D-25, paragraph 5, revise the last sentence as follows: "Upper Owens River flows have been at natural rates since 1989, although flows were augmented in October 1991 for the purpose of conducting an instream flow study. (EBASCO Environmental et al. 1993.)"

On page 3D-28, paragraph 5, revise the last sentence as follows: "The principal nongame species are Owens sucker and Owens tui chub (Lahontan hybrids), which provide important forage for the trout."

On page 3D-31, paragraph 4, revise sentence 1 as follows: "Nongame species in the Middle Owens River include carp, threespine stickleback, Owens sucker, and Owens tui chub (Lahontan hybrids)."

On page 3D-33, paragraph 4, after the last sentence, add: "DFG's plans for the Lower Owens River also include restoring flows from the aqueduct intake to Owens Lake."

On page 3D-37, paragraph 4, revise sentence 4 as follows: "Native fish species in the Middle Owens River were not quantitatively evaluated because few, if any, data exist on their habitat preferences and sampling their populations would be extremely difficult."

On page 3D-38, paragraph 3, revise sentence 1 as follows: "Monthly WUA values for each life stage were then averaged for each year to determine an annual WUA value for each species and for each year in the 1940-1989 hydrologic period."

On page 3D-42, paragraph 2, revise sentence 1 as follows: "Water quality conditions in the affected streams are expected to remain at acceptable levels under all alternatives."

On page 3D-44, paragraph 4, revise sentence 1 as follows: "Compared to the 1989 point of reference, all alternatives except the No-Restriction Alternative would have substantial fishery benefits in the Mono Lake tributaries."

On page 3D-44, paragraph 4, revise sentence 3 as follows: "Similarly, it will be at least 50 years before any of the alternatives can restore and maintain pre-1941 fishery conditions."

On page 3D-68, paragraph 5, revise the last sentence as follows: "Consequently, habitat conditions would not be reduced over time under the 6,377-Ft Alternative and would therefore provide better overall aquatic habitat conditions than would the 6,372-Ft Alternative, which would not meet flushing flow requirements."

On page 3D-78, paragraph 2, after the semicolon in the third sentence, revise as follows: "during direct observation surveys at flows between 100 cfs and 200 cfs in May 1991, brown trout fry were found only in a few locations where such habitat was present (Jones & Stokes Associates 1992)."

On page 3D-98, paragraph 5, revise the last sentence as follows: "The increased flows since 1941 reduced adverse water temperature and water quality effects in the Upper Owens River, particularly below Hot Creek."

On page 3D-102, paragraph 1, revise the last sentence as follows: "Significant adverse water quality and water temperature effects on aquatic resources were naturally present below Hot Creek prior to LADWP exports."

On page 3D-103, paragraph 2, revise sentence 1 as follows: "None of the proposed EIR alternatives would succeed in restoring aquatic habitat and fish populations to prediversion levels within 50 years."

On page 3D-103, paragraph 2, revise sentences 3 and 4 as follows: "Because of additional habitat degradation associated with geomorphic and vegetative changes, mostly associated with LADWP's long-term diversions, restoration of continuous flows alone would not fully restore the habitat values or fisheries that existed before 1941. All alternatives, therefore, in the absence of mitigation, would continue to have significant adverse cumulative impacts on geomorphology and fish populations on major sections of Rush, Lee Vining, Parker, and Walker Creeks, particularly in the lower portions of Rush and Lee Vining Creeks."

On page 3D-108, replace the bullets in the second paragraph (referring to Lee Vining Creek) with the following data:

Month	Dry	Normal	Wet
Apr	37	54	54
May	37	54	95
Jun	37	54 ^a	95 ^b
Jul	37	54	95
Aug	37	54	95
Sep	37	54	54
Oct	25	40	40
Nov	25	40	40
Dec	25	40	40
Jan	25	40	40
Feb	25	40	40
Mar	25	40	40

^a A channel flushing flow of 160 cfs for a minimum of 3 consecutive days during June is recommended. The channel flushing period should be extended as water is available.

On pages 3D-108, 3D-109, and elsewhere change California Department of Fish and Game 1992a and 1992b to EBASCO Environmental 1993a and 1993b, respectively.

On page 3D-114, paragraph 1, revise sentence 3 as follows: "It is difficult to conclusively establish alternatives, instream flow requirements, or mitigation measures that will meet the court order because the pre-1941 fishery conditions (fish population characteristics or habitat features) cannot be accurately and precisely described in any quantitative terms."

On page 3D-115, paragraph 2, revise sentence 1 as follows: "Compared to the 1989 point of reference, all alternatives except the No-Restriction Alternative have substantial fishery benefits in the Mono Lake tributaries."

On page 3D-115, paragraph 2, revise sentence 3 as follows: "Similarly, it will be at least 50 years before any of the alternatives can restore and maintain pre-1941 fishery conditions."

^b A channel flushing flow of 160 cfs for 30 consecutive days during late May, June, and July is recommended.

On page 3D-119, add the following reference: "Stine, S. 1991. Extent of riparian vegetation on streams tributary to Mono Lake, 1930-1940; an assessment of the streamside woodlands and wetlands, and the environmental conditions that supported them. (Mono Basin EIR Auxiliary Report No. 1.) California State Water Resources Control Board. Sacramento, CA."

On page 3D-119, revise Stine 1992 citation as follows: "______. 1992b. Past and present geomorphic, hydrologic, and vegetative conditions on Rush Creek. Prepared for Trihey & Associates, Walnut Creek, CA."

On page 3D-121, revise Stine personal communication as follows: "Stine, Scott, Ph.D. Geomorphologist. Berkeley, CA. January 14, 1992 - text of report given at Restoration Technical Committee."

On Table 3D-1, add tui chub (*Gila bicolor*) as a fish species reported to occur in Mono Basin.

Table 3D-8. This table is revised as included herein.

Chapter 3E. Environmental Setting - Aquatic Productivity of Mono Lake

On page 3E-2, paragraph 1, add ", Packard Foundation, National Geographic Society, and Santa Clara Audubon Society" after period in 1st sentence.

On page 3E-5, paragraph 2, delete sentence 2.

On page 3E-7, paragraph 4, revise paragraph to read: "Benefits of high salinity . . . less interspecies competition and less predation because very few organisms can tolerate such high levels."

On page 3E-13, revise sentence 2 as follows: "Only a portion of annual primary production influences brine shrimp production, and effects of meromixis on algal production may not be fully propagated up the food chain."

On page 3E-14, paragraph 4, sentence 4, change "Abert Lake in Oregon, which has a salinity of about 30 g/l, has about twice . . . " to "When Abert Lake in Oregon had a salinity of about 30 g/l, it had about twice . . . ".

On page 3E-15, delete 1st complete sentence. Change 2nd complete sentence to read: "However, a leafy algae may have been . . . ". Add 3rd sentence: "Alternatively, the use of soft substrates in lieu of hard substrates may have caused a higher rate of fly pupa dislodgment."

On page 3E-19, 3rd paragraph, revise 1st sentence as follows: "The model calculates mean daily density, biomass, and production for the May 1 through October 1 growing season."

On page 3E-22, 3rd paragraph, change 3rd sentence to read "When the grazing rate is below maximum (because algal biomass is below the feeding saturation level), the rate is dependent . . . ".

On page 3E-23, 2nd paragraph, change final sentence to read: "However, the ovoviviparity results are difficult to interpret because percent . . . ".

On page 3E-24, 1st paragraph, change 2nd sentence to read "Mason (1967) found . . . ".

On page 3E-24, 1st paragraph, delete final sentence.

On page 3E-28, 2nd paragraph, change final sentence to read "... because submerged vegetation is not modeled".

On page 3E-32, change 3rd sentence to read "Total brine shrimp production increased about 167% between lake levels . . . ".

On page 3E-32, 2nd full paragraph, change 1st sentence to read "... observed range of values so that several equations describing the relationship between salinity and conductivity ...".

On Figure 3E-17, move "Mudstone (MS)" in legend to "Hard Substrate" list.

Chapter 3F. Environmental Setting, Impacts, and Mitigation Measures - Wildlife

No changes are needed.

Chapter 3G. Environmental Setting, Impacts, and Mitigation Measures - Land Use

On page 3G-3, second paragraph, change "Homestead Act of 1882" to "Homestead Act of 1862".

On page 3G-3, third paragraph, add citation for entire paragraph, "Fletcher 1987".

On page 3G-3, fourth paragraph, change citation (Fletcher 1987) to apply to entire paragraph. Also, revise third sentence to read: "In 1929, the census reported 11,500 acres irrigated in the basin (although Vorster [1985] believes a considerable portion had to be only intermittently irrigated)."

On page 3G-5, second paragraph, add sentence: "Vorster, however, believes that it would be difficult to sustain such irrigation diversions from Walker and Parker Creeks, especially in dry years, because the estimated diversion is larger than the two creek's average annual flow. He also believes the diversions from Rush Creek were larger than Rawson estimates."

On page 3G-7, second paragraph, last sentence, change "and for other purposes" to "and for the protection of historic water-dependent recreational and grazing uses of the federal lands."

On page 3G-14, first paragraph under "Mono Sheep Company", change location of company from "Barstow" to "Oildale".

On page 3G-20, third paragraph, second sentence, change "in the 1960s" to "in 1915".

On page 3G-20, fourth paragraph, change second sentence to read: "To address a lack of sufficient housing and the scarcity of land for Lee Vining's expansion, the Mono County General Plan has identified a community expansion area directly north of and adjacent to Lee Vining abutting U.S. Highway 395. The ultimate development of this expansion area will be dependent on the preparation of a specific plan and the willingness of LADWP to dispose of or lease this area."

On page 3G-21, first paragraph, last sentence, change to: "Quarries are also present at Black Point, in the southern portion of the Mono Craters, and east of Mono Craters."

On page 3G-24, fourth paragraph, last sentence, delete "also serving as the Mono Basin National Forest Scenic Area headquarters".

On page 3G-24, under "Objectives" add "For the most part, these objectives have been mandated by Congress."

On page 3G-26, fifth paragraph, first sentence, change "has been proposed" to "has been approved by the county". Delete the last sentence.

On page 3G-26, revise last paragraph to read "Mono County has recently approved an expansion of existing recreational facilities on the John Arcularius Ranch, allowing for 50 additional guest cabins and two single-family residences. Irrigation of the ranch's meadowland from the Upper Owens River would continue."

On page 3G-29, last paragraph, between third and fourth sentence, add "According to the scenic area enabling legislation, LADWP lands within the scenic area can by obtained only by donation or exchange."

On page 3G-34, under "Mitigation Measures" amend last sentence to read: "The USFS could acquire lands within the boundary of the Mono Basin National Forest Scenic Area where proposed development would conflict with the area's management plan."

On page 3G-37, last sentence under "Mitigation Measures for Significant Cumulative Impacts", delete "but lake release flows would be unaffected".

Chapter 3H. Air Quality

No changes are needed.

Chapter 3I. Environmental Setting, Impacts, and Mitigation Measures - Visual Resources

No changes are needed.

Chapter 3J. Environmental Setting, Impacts, and Mitigation Measures - Recreation Resources

On page 3J-6, second full paragraph, revise last sentence to read: "Recreational use of the Inyo National Forest . . . 8.3 million RVD in 1992."

On page 3J-14, first full paragraph, revise last sentence to read: "Flows in the Upper Owens River would not be significantly reduced by extractions of groundwater proposed for municipal use by the town of Mammoth Lakes (U.S. Forest Service 1992)."

On page 3J-17, paragraph 1, revised the first sentence to read: "The reach of the Owens River gorge just downstream from Long Valley Dam supports a moderate level of fishing, primarily for brown trout." The second sentence of this paragraph should be deleted.

On page 3J-26, second full paragraph, delete the last sentence.

On page 3J-42, revise the sentence following the first header entitled "Mitigation Measures" as follows: "The effects on sightseeing from tufa tower inundation and toppling could be reduced by construction of over-the-water boardwalks at South Tufa."

On page 3J-47, revise the sentence following the first header entitled "Mitigation Measures" as follows: "The effects on sightseeing from tufa tower inundation and toppling could be reduced by construction of over-the-water boardwalks at South Tufa."

On pages 3J-50 to 3J-51, add the following paragraph at the end of the section entitled "Related Impacts of Earlier Stream Diversions by LADWP - Mono Lake": "If additional mitigation for historical diversions is required to provide fishing opportunities before the fisheries of the lower tributaries are fully restored, off-site restoration projects (e.g., at Fish Springs in Inyo County) could be implemented."

Chapter 3K. Environmental Setting, Impacts, and Mitigation Measures - Cultural Resources

On page 3K-1, 3rd sentence, revise as follows: "Minimal effects might result from establishing higher or lower lake levels because few sites may be present on the relicted lands."

On page 3K-3, add the following sentence to the last paragraph under "Applicable Laws and Regulations": "Section 106 of the National Historic Preservation Act applies to sites on federal lands, requiring consultations with federal authorities."

On page 3K-4, 2nd paragraph under "Prediversion Conditions", 2nd sentence, change "Jeffrey pine" to "pinyon pine".

On page 3K-5, revise third sentence to read, "The Mono Lake Paiute are classed as a subgroup of the larger linguistic family of Numic-speaking Northern Paiute, while the Owens Valley Paiute speak dialects of Mono. Change the citation on the 4th sentence from "Hall 1983" to "Liljeblad and Fowler 1986".

On page 3K-10, 2nd paragraph, 4th sentence, revise to read: "Evidence exists of earlier occupation in Mono Basin (Hall 1990) and the Upper Owens River Basin. The latter occupancy is indicated by fluted points found at the Komodo site (Basgall 1984, 1987, 1988 *in* Goldberg et al. 1990).

On page 3K-11, 3rd paragraph, 1st sentence, add "obsidian quarries".

On page 3K-11, under "Mono Lake Margin", change 1st sentence to read: "Little of the area around Mono Lake has been systematically surveyed, and some resources have been identified near the present lake margin (Reynolds 1986)."

On page 3K-12, 3rd paragraph, revise 1st sentence as follows: "In terms of overall sensitivity of Mono Lake's margin for cultural resources, additional unrecorded sites may be located below 6,440 feet

because Native American occupancy could have occurred when the lake level was lower than during the historical period." In the 3rd sentence, delete "however".

On page 3K-14, change last sentence under "Restoration Activities" to read: "In addition, stream or wetland restoration or revegetation could conflict with Native American gathering practices."

Chapter 3L. Environmental Setting, Impacts, and Mitigation Measures - Water Supply

On page 3L-9, paragraph 3, sentence 1, revise as follows: 'Groundwater. LADWP currently obtains an average of 112,000 af/yr from local groundwater basins, including the San Fernando Basin (92,300 af/yr), the Sylmar Basin (3,100 af/yr), and the Central Basin (15,000 af/yr)."

On pages 3L-9 and 3L-10, delete the last two sentences in the last paragraph beginning on page 3L-9 and replace with the following: "According to LADWP, the recently completed Inyo/Owens groundwater pumping agreement does not limit the amount of water than can be pumped from the Owens Valley to a particular number. The amount is limited by vegetation condition and groundwater surface elevation, among other factors."

On page 3L-33, paragraph 3, revise sentences 1, 2, and 3 as follows: "The Central Valley Project (CVP) Improvement Act (Title XXXIV of Public Law 102-575) allows for restructuring California's Central Valley Project. Under this bill, farmers receiving federal CVP water will be able to voluntarily sell their water to municipalities. Consequently, urban shortages could be reduced by the purchase of irrigation supplies."

On page 3L-34, paragraph 1, sentence 1, replace "the SWP" with "MWD". Add the following to the end of the paragraph: "This potential yield increase is currently uncertain because of potential restrictions on exports from the Delta."

On page 3L-34, paragraph 2, delete sentence 2 and revise sentence 1 as follows: "For impacts on MWD and its customers, projects that could affect MWD's future water supply include potential changes in exports from the Bay-Delta as a result of the proposed SWRCB long-term water quality and water rights decision, proposed water quality standards presently being developed by the U.S. Environmental Protection Agency, constraints on operation of Delta export facilities by the U.S. Fish and Wildlife Service and the National Marine Fisheries Service to protect threatened or endangered species, requirements under the CVP Improvement Act to utilize 800,000 af of CVP water for environmental purposes, potential increase in yield from SWP facilities and programs, changes in the availability of Colorado River supplies, and potential water transfers under the CVP Improvement Act. On balance, these projects, in conjunction with the adverse impacts associated with each of the project alternatives would probably lower MWD's total supplies."

Table 3L-3 is revised with addition of a new column for "Year 2011 Yield" as included herein.

Chapter 3M. Environmental Setting, Impacts, and Mitigation Measures - Power Generation

No changes are needed.

Chapter 3N. Environmental Setting, Impacts, and Mitigation Measures - Economics

No changes are needed.

CHANGES TO THE DRAFT EIR APPENDICES

Appendix E. Special-Status Species in Mono Basin and Upper Owens River Basin

On page F-2, paragraph 6, revise sentence 3 as follows: "A population of mountain yellow-legged frogs with two to three thousand individuals was counted by USFS during summer 1993. USFS protects this habitat area by restricting grazing from the drainage where they are located."

Appendix F. Vegetation and Substrate Classification and Descriptions

Table F-2 is revised as included herein (the version in the draft EIR was a preliminary draft inadvertently included).

Appendix H. Drought Analysis

Tables H-6 through H-12 are revised as included herein.

Appendix I. Natural History of the Mono Lake Alkali Fly

On page I-3, change 1st sentence to read "Mono Lake alkali fly have few predators or competitors."

Appendix L. Alkali Fly Productivity Model

On page L-14, change 1st complete sentence to read: " \dots third instar development time (15 days at 20° C) to \dots ".

On Figure L-11a, change Y axis label to read "Density (thousands of individual /m²)".

On Figure L-11b, change Y axis label to read "Density (thousands of individuals /m²)".

Appendix M. Brine Shrimp Productivity Model

On page M-2, change last sentence to read "... and Melack 1992)".

On page M-4, change 1st complete sentence to read: "The computed relationship (Jellison 1992) between EC and salinity is: \dots ".

Appendix V. Visual Resources

On Figure V-4, in the note, change "Rush Creek" to "Lee Vining Creek".

Appendix Y. Applicable Policies of the Mono County General Plan

List of Refs

Stine pers. comm. 6
Stine pers. comm. 6
Stine 1991 8
Jones & Stokes Associates 1993 8
EBASCO Environmental et al. 1993. 9
Jones & Stokes Associates 1992 10
Mason (1967) 13
Fletcher 1987 14
Vorster [1985] 14
Hall 1990 16
Basgall 1984, 1987, 1988 in Goldberg et al. 1990 16
Reynolds 1986 16
Jellison 1992 19

Table of Contents

CHANGES TO THE DRAFT EIR CHAPTERS	I
Summary	1
Chapter 1. Introduction	2
Chapter 2. Project Alternatives and Points of Reference	2
Chapter 3A. Environmental Setting, Impacts and Assessments, and	
Methodology - Hydrology	2
Chapter 3B. Environmental Setting, Impacts, and Mitigation	
Measures - Water Quality	3
Chapter 3C. Environmental Setting, Impacts, and Mitigation	
Measures - Vegetation	3
Chapter 3D. Environmental Setting, Impacts, and Mitigation	
Measures - Fishery Resources	7
Chapter 3E. Environmental Setting - Aquatic Productivity	
of Mono Lake	12
Chapter 3F. Environmental Setting, Impacts, and Mitigation	
Measures - Wildlife	13
Chapter 3G. Environmental Setting, Impacts, and Mitigation	
Measures - Land Use	
Chapter 3H. Air Quality	15
Chapter 3I. Environmental Setting, Impacts, and Mitigation	
Measures - Visual Resources	15
Chapter 3J. Environmental Setting, Impacts, and Mitigation	
Measures - Recreation Resources	15
Chapter 3K. Environmental Setting, Impacts, and Mitigation	
Measures - Cultural Resources	16
Chapter 3L. Environmental Setting, Impacts, and Mitigation	
Measures - Water Supply	17
Chapter 3M. Environmental Setting, Impacts, and Mitigation	1.0
Measures - Power Generation	18
Chapter 3N. Environmental Setting, Impacts, and Mitigation	1.0
Measures - Economics	
CHANGES TO THE DRAFT EIR APPENDICES	18
Appendix E. Special-Status Species in Mono Basin and	10
Upper Owens River Basin	18
Appendix F. Vegetation and Substrate Classification	10
and Descriptions	
Appendix I. Diought Analysis Appendix I. Natural History of the Mono Lake	, 10
Alkali Fly	10
Appendix L. Alkali Fly Productivity Model	
Appendix M. Brine Shrimp Productivity Model	
Appendix V. Visual Resources	
Appoint 1. Visual resources	1)

Appendix Y.	Applicable Policies of the Mono County	
Gene	ral Plan	20