Code Response X - Legal Issues Points of Reference Are Not Appropriate or the Project Is Improperly Defined X1 X2 Environmentally Superior Alternative Is Improperly Identified X3 EIR Analyses Do Not Meet Scientific Standards X4 Other CEQA Provisions Are Not Met X5 Public Trust Issues Are Inadequately Addressed X6 Fisheries Laws, Rules, and Regulations Are Inadequately Considered or Applied; Recommendations of the California Department of Fish and Game Must Be Adopted X7 California Air Quality Law (Health and Safety Code Section 42316) Prohibits Interference with LADWP Water-Gathering Activities and Represents a Legislative Balancing of Water Rights and Air Quality Public Trust Values Water Quality and Environmental Impacts of Developing Alternative Water Supplies Are Not Evaluated X8 Effects of the Alternatives on the Threatened or Endangered Status of Mono Lake Brine Shrimp Are Not X9 Addressed An Antidegradation Threshold for Outstanding National Resource Waters Is Improperly Formulated X10 X11 Impact Assessments of Project-Related Irrigation and Grazing Changes Are Absent Y - Special Responses (No individual responses are given [except for Y*]) Y1 Text correction warranted (the correction appears in Chapter 7, "Errata"); no additional response is needed Y2 A recommendation, expression of opinion, or advice that will be considered by SWRCB in its deliberations Y3 Comment not understood (apparent error or misunderstanding) Y4 Data, information, clarification, or request for more analyses not germane to the decision to be made by **SWRCB** Y5 Comment already answered in a discussion in the draft EIR; the page, figure, or table number of the draft EIR follows the code in parenthesis ("T" indicates a table and "F" indicates a figure).

Comment not otherwise classifiable and given an individual response.

Y*

Code Response

Z - Nonspecific, Speculative, Erroneous, or Argumentative Comment

Z No reasoned response is possible because the comment is too general, is purely speculative, asserts an assumption in the draft EIR not actually made, or is argumentative without factual basis.

A - Hydrology and Formulation or Characterization of Alternatives

- A1 LAAMP Model Was an Erroneous or Inadequate Basis for Impact Assessments
- A2 LAAMP Model Results Were Inappropriately Applied for Impact Assessments
- A3 Mono Lake Water Balance Model Was Erroneous
- A4 Alternatives Were Not Formulated Using DFG-Recommended Streamflows
- A5 The Drought Analysis Was Erroneous and Improperly Applied for Impact Assessment
- A* Comment given an individual response

B - Water Quality

- B1 Mono Lake Salinity Characteristics Were Not Properly Described
- B2 Upper Owens River and Lake Crowley Reservoir Water Quality Effects Were Not Adequately Considered
- B3 City of Los Angeles Drinking Water Quality Effects Were Not Adequately Considered
- B* Comment given an individual response

C - Vegetation

- C1 Failure to Consider the Loss of Wetlands at Lake Crowley Reservoir
- C2 Failure to Consider the Significant Prediversion Marsh and Meadow Wetlands on the Rush Creek Delta
- C3 Loss of Special-Status Plant Populations Not Considered Significant
- C4 Prediversion Vegetation Conditions along the Tributary Streams Are Unknown or Are Improperly Characterized
- C5 Natural Recovery of the Tributary Streams Is Not Accurately Addressed, and the Groundwater Model Used Is Inadequate

Code	Response	
C6	Streamflow Thresholds Considered Damaging to Riparian Vegetation in Mono Basin Are Not Realistic	
C*	Comment given an individual response	
D - Fisheries		
D1	Prediversion Habitat Conditions and Fish Populations Are Improperly Characterized	
D2	Point-of-Reference Habitat Conditions and Fish Populations Are Improperly Characterized	
D3	Fisheries Models and Impact Analyses Are Inappropriate and Flawed	
D4	Potential for Stream Recovery Is Improperly Characterized in Mono Basin Tributaries	
D5	Adverse Effects of High Flows on Fisheries Habitat and Fish Populations in Mono Basin Are Overestimated	
D6	Mitigation Measures for Significant Cumulative Impacts Are Not Appropriate	
D7	Upper Owens River Point-of-Reference Conditions Are Improperly Characterized and Fisheries Impacts at High Lake Levels Are Not Appropriately Ascribed to LADWP-Induced Channel Changes	
D8	IFIM Habitat Predictions Do Not Relate to Fish Populations, and IFIM Studies Used in the Draft EIR Were Flawed	
D*	Comment given an individual response	
E - Aquatio	c Productivity	
E1	Assumptions of the Alkali Fly Model Are Not Stated or Are Unsupported by Data	
E2	Brine Shrimp Model Is Inappropriately Applied to Prediversion Lake Levels	
E3	Impact Assessment Criteria for Significance Are Arbitrary and Unrealistic	
E4	Impact Assessment Conclusions Rely Too Heavily on Results of Simulation Models	
E5	Relationship between LAAMP and DYRESM Models	
E*	Comment given an individual response	

F - Wildlife

F1 Prediversion Populations Estimates of Ducks and Other Migratory Water Birds Were Unreliable

Code	Response
F2	Prediversion Waterfowl Habitats at Mono Lake Were Insufficient to Support One Million Migratory Ducks
F3	Superabundant Food Source for Water Birds Was Not Recognized
F4	Food Supply Was Incorrectly Identified as Restricting Phalarope Distribution
F5	California Gull-Nesting Capacity Estimates Were Incorrect and Misleading
F6	Paoha Island Was Not Identified as Potential California Gull-Nesting Habitat
F7	The California Gull Impact Analysis Ignored the Point of Reference
F8	California Gull Nesting Preferences Were Not Correctly Identified
F9	Effects of Increased Lake Elevations on Caspian Terns Were Not Considered
F10	Eared Grebes Were Not Considered in the Impact Analysis
F11	Effects of Lost Alkali Shoreline Habitat on Nesting Snowy Plovers Were Not Identified
F12	Benefits of Higher Lake Elevations to Water Birds Were Not Identified
F13	Impacts of Major Losses of Habitat on Bald Eagles, Willow Flycatchers, and Other Special-Status Species Were Not Identified
F14	The Wildlife Benefits of Increased Flows in the Upper Owens River Were Not Discussed
F15	Benefits of New Wetland Wildlife Habitats Created by Lake Crowley Reservoir Were Not Discussed
F*	Comment given an individual response

G - Land Use

G* Comment given an individual response

H - Air Quality

H1	A Designated Regulatory Model Should Have Been Used
H2	Modeling Analyses Did Not Properly Characterize Emission Sources
НЗ	Modeling Analyses Did Not Address the Potential for New Salt Deposit Formation at Higher Lake Levels

Code	Response
H4	The EIR Should Include a Comparative Summary of Results from the 1991 and 1993 Modeling Analyses Conducted for GBAPCD
H5	The Draft EIR Does Not Address Health Risks Associated with the Arsenic Content of PM10 in Mono Basin
Н6	The Draft EIR Does Not Adequately Discuss the Full Range of Health and Ecosystem Effects Associated with High PM10 Concentrations
H7	Air Quality Mitigation Measures Are Not Adequately Addressed
Н8	The Regulatory Requirements Associated with the State PM10 Standards Should Be More Completely Described
H*	Comment given an individual response
I - Visual Resources	
I1	Criteria Used to Judge the Significance of Visual Impacts Are Inappropriate and Conclusions Are

- Unsupportable
- The Methodology for Assessing Visual Impacts Is Flawed I2
- The Analysis of the Effects on Tufa Is Flawed I3
- The Accuracy of the Photosimulations Is Suspect I4
- The Design and Administration of the Public Perception Survey and Interpretation of the Results Are **I**5 Questionable
- I* Comment given an individual response

J - Recreation

- J1 Point of Reference for Recreation Impacts at Grant Lake Reservoir Is Inappropriate
- J2 Use of Historical Visitor Data for Mono Lake Tufa State Reserve Results in Underestimation of Use and Economic Impacts at Mono Lake
- J3 The Beneficial Recreation Impacts of Partial-Submergence of Tufa at the 6,390-Ft Lake Level Should Be Analyzed
- J4 Extrapolating from Historical Angling Use Levels on the Lower Tributaries Results in Underestimation of the Long-Term Effects of Alternative Streamflows on Angling Use and Related Economic Effects

Code		Response
J*	Comment given an individual response	

K - Cultural Resources

K* Comment given an individual response

L - Los Angeles Water Supply

L1	Assumptions about Reclamation Projects Included in the Water Supply Analysis Are Questionable
L2	The Water Supply Analysis Should Have Been Based on Stochastic Simulation of Water Supply Years
L3	The Source and Effects of Increased LADWP Demand for MWD Supply Were Not Considered
L4	Procedures for Taking Potential Reductions in Colorado River Water into Account in the Draft EIR Analysis Are Unclear
L5	Mitigation Measures Are Speculative
L6	Demand Projections, Conservation, and Use of Best Management Practices Need to Be Addressed More Fully
L7	Significance Criteria Used to Assess Indirect Impacts on MWD Have No Justification
L8	The Drought/Acute Shortage Analysis Was Insufficient
L9	Water Supply Modeling Did Not Adequately Address Lake Level Transition Periods
L10	Further Clarification and Justification of LA Basin Groundwater Pumping Assumptions Are Needed
L11	Several Misleading or Outdated Assumptions from LADWP's Urban Water Management Plan Were Used to Develop the Water Supply Simulation Model
L12	The Water Supply Simulation Model Is Incapable of Addressing Temporal Variations in Supply and Should Reflect Marginal Costs
L*	Comment given an individual response

M - Power Generation

M1 Key Assumptions of the Effects on Rated Capacity and Energy from the LA Aqueduct Units and the Availability of Replacement Capacity and Energy Are Missing

Code	Response	
M2	Potential Air Quality Effects Resulting from Changes in Energy Production from the LA Aqueduct Units Are Minimized in the Analysis	
M*	Comment given an individual response	
N - Economics		
N1	Water Shortage Costs Are Underestimated	
N2	The Indirect Economic Costs Associated with MWD's Actions to Serve LADWP Are Not Appropriately Analyzed	
N3	The Draft EIR Does Not Present Any Evidence of Economic Robustness for Its Conclusions	
N4	Conditions Described in the Household Survey Are Not Consistent with the EIR Alternatives	
N5	The Sampling Design Used in the Household Survey Resulted in Sample Selection Bias	
N6	The Draft EIR Does Not Provide Any Statistical Confidence Intervals for the Estimates of Preservation Values from the Household Survey	
N7	The Draft EIR Fails to Discount Household Willingness to Pay Estimates for Future Years	
N8	Linearly Extrapolating between Different Water Levels Is Not Appropriate to Estimate Preservation Values	
N*	Comment given an individual response	