

Code	Response
X - Legal Issues	
X1	Points of Reference Are Not Appropriate or the Project Is Improperly Defined
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
X8	Water Quality and Environmental Impacts of Developing Alternative Water Supplies Are Not Evaluated
X9	Effects of the Alternatives on the Threatened or Endangered Status of Mono Lake Brine Shrimp Are Not Addressed
X10	An Antidegradation Threshold for Outstanding National Resource Waters Is Improperly Formulated
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).
Y*	Comment not otherwise classifiable and given an individual response.

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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

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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 - Aquatic 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

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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

H3 Modeling Analyses Did Not Address the Potential for New Salt Deposit Formation at Higher Lake Levels

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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
H6	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
H8	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
I2	The Methodology for Assessing Visual Impacts Is Flawed
I3	The Analysis of the Effects on Tufa Is Flawed
I4	The Accuracy of the Photosimulations Is Suspect
I5	The Design and Administration of the Public Perception Survey and Interpretation of the Results Are 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

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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

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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
