



the Owens Valley Committee

P.O. Box 77, Bishop, CA 93515
January 5, 2018

Owens Valley Committee Comments on the Draft 2017 LORP Annual Report

The Owens Valley Committee (OVC) thanks the Inyo County Water Department (ICWD) and the Los Angeles Department of Water and Power (LADWP) for the opportunity to comment on the 2017 LORP Annual Report.

LORP Flows

LADWP's 2017 emergency release of runoff down the LORP was not planned, and would not have occurred in an average precipitation year. Months of high flows created vast areas of inundation, which had a detrimental effect on LORP restoration efforts and project goals, and did nothing to "flush out" excessive vegetative buildup (i.e. tules) in the LORP. OVC cites these examples as results of the long-term high flow regime:

- A. Promotion of more salt cedar recruitment
- B. Negation of pole planting experiment
- C. Negative impact regarding woody recruitment
- D. Potential negative impact on tall, established willows that provide the habitat for key avian species
- E. Recruitment and spread of weedy species like *bassia* and *lepidium*
- F. Fish kills

OVC recommends that LADWP and ICWD monitor the impacts of last year's unprecedented flows down the LORP, and in turn evaluate and analyze the long-term impacts as a crucial part of the 2018 Annual Report. Questions that should be addressed include:

- A. How much were the overall goals of the project set back?
- B. Are there feasible alternatives to shunting that much water down the LORP (e.g. pulsing flows, etc.)?

OVC recommends that LADWP better plan for this type of future runoff event, and — with significant reference to monitoring efforts and analyses — thereby mitigate the negative impacts seen during the 2017 long-term emergency releases.

Recreation

A great shortcoming of the annual report is its lack of a recreational component, which is one of the stated goals of the 1997 MOU and LORP EIR. The goal of sustaining recreation is the responsibility of all parties to the LORP, not just Inyo County.

OVC believes the omission of the Owens River Water Trail (ORWT) from the 2017 Annual Report is one of the document's most glaring deficiencies. We urge its inclusion in the final report. LADWP considers the ORWT to be merely a county recreation project. Yet it has a strong potential to improve water quality and river habitat. Mechanical in-river excavation will clear 0.8 miles of river obstructions. Hand labor and specialized water craft will be used to open and maintain 1.75 miles of tule-constricted channel.

Tules are considered to be the second most pressing problem on the LORP. Fishermen, boaters, canoers, and others who wish to recreate on the river, as well as on Lone Pine and Billy Ponds, cannot access or have limited access because of excessive tule growth. Again, 2017's high flows did nothing to remove tules, and likely new areas of inundation have led to new recruitment of tules, further restricting access.

OVC supports the ORWT and the extensive mechanical removal of tules. This will provide the best opportunity for a self-sustaining fluvial habitat as dictated by the 1997 MOU. The MOU consultants support and recommend the ORWT. It was included in the 2016 report under adaptive management, and OVC demands that it be included under adaptive management in the 2017 final report.

Tamarisk Removal/ Exotic Vegetation

With huge amounts of water deposited in spreading basins along the LORP, tamarisk will re-establish itself with renewed vigor. ICWD has run out of funding for its tamarisk removal project, and only has resources to survey potential problem areas. OVC recommends that DWP, as a mitigation effort for its emergency releases, fund additional tamarisk/ invasive weed eradication efforts.

A recent discovery of tamarisk beetles on the LORP may provide another tool in the ongoing effort to eradicate tamarisk from the LORP. OVC recommends further study of this treatment method with an eye toward increasing introductions of the beetle if they prove a feasible option.

Reduced Dissolved Oxygen and Fish Kills

The high summer releases to the LORP resulted in significant fish and invertebrate mortality, yet quantifiable data accumulation appears to be lacking in this report. LADWP needs to review 2017 data, and establish thresholds for future runoff events of this nature in order to re-evaluate high flows and reduce the likelihood of fish kills like those seen this past summer. Not only do these kills affect the viability of the aquatic ecosystem, they also reduce the recreational viability of the river for anglers.

Warm Water Fishery

A major goal of the LORP is the establishment of a healthy recreational warm water fishery. OVC supports a detailed analysis and assessment of the extent of the 2017 fish kills and their overall impact on meeting this goal. This assessment should include impacts on the fisheries in off-channel lakes and ponds. This data should appear in the 2018 LORP Annual Report. We further support CDFW's recommendation that LADWP institute "more robust methodologies" than the current creel census to assess LORP fish populations and dynamics.

Seasonal Habitat Flows

The 2017 Annual Report recommends raising the seasonal habitat flows to 400 cfs. The report further states that flows peaked at 380 cfs. If 380 cfs flows did little to remove organic detritus and affect bank dynamics, what greater impact will 400 cfs flows have? Without some form of mechanical intervention, a 400 cfs flow will do nothing and LORP goals will remain unmet. OVC supports the kind of mechanical intervention and adaptive management proposed by the Owens River Water Trail project, which seeks to clear and provide watercraft and angler access to over a 6 mile stretch of the LORP.

Rapid Assessment Survey (RAS)

Although it is scheduled to expire, OVC supports the continuation of the RAS as one of the more effective methods of monitoring the LORP. Not only does the RAS help assess woody recruitment and survivorship of seedlings it also tracks beaver populations and new infestations of invasive species.

Monitoring Equipment

During the recent (December 21, 2017) meeting regarding the LORP Annual Report, several references were made to monitoring equipment that is no longer working or in need of repair. Accurate readings of stream criteria may be affected. OVC supports the repair and/ or replacement of such equipment so we can continue to harvest quality data in a timely manner.

Agriculture

OVC seeks more discussion in the annual plan regarding sustainable agriculture on the LORP. Specifically, how the abundance of tules and last summer's flooding are negatively impacting floodplain forage.

Woody Recruitment

High summer flows down the LORP dealt a crushing blow to the pole planting project. OVC continues to support active efforts to establish tree sites along the riparian corridor. OVC urges DWP and ICWD to fund and implement another pole planting project in the coming season. OVC also urges real monitoring of established riparian vegetation, such as willows and cottonwoods, which likely were also impacted by root inundation for an extended period. We cannot afford to lose trees so vital to numerous avian species.

Public Engagement in the LORP

OVC urges the following steps be taken to enhance the quality of public engagement for the LORP Annual Report meeting:

1. Schedule meetings at hours convenient to the general public, i.e. in the evenings after the average work day. (Not at 8:00 A.M. on a Tuesday)
2. Rotate meeting locations to Lone Pine and/or Independence so residents of southern Inyo County, where most of the LORP is located, have a chance to provide input.
3. Provide the public with adequate advance notice of meetings through press releases, radio announcements, etc.
4. Contact the LORP consultants well in advance of the meeting to elicit their involvement in the process.
5. Have technical experts on hand at the meeting to answer specific technical questions.

6. Facilitate annual report meetings with an atmosphere of patience and jointly-sought clarity on these important issues.
7. OVC demands that future LORP comment periods not coincide with the holiday season. Schedule comment periods well before or well after the holidays.

The future of LORP

The LORP is now a decade old and OVC is concerned that many of its goals are not being met. OVC proposes a meeting of the MOU parties in the future to re-evaluate the goals of the project.

OVC is thankful for the additional time provided to submit these comments.

Sincerely,

A handwritten signature in cursive script that reads "Mary Roper".

Mary Roper
President, Owens Valley Committee