Chapter 1. Introduction

This document is intended to serve as the final environmental impact report (EIR) as required under the California Environmental Quality Act (CEQA) for the review of the Mono Basin Water Rights of the City of Los Angeles. This final EIR consists of the draft EIR, comments on the draft EIR, responses to comments, and errata for incorrect information in the draft EIR. As provided for by law, the draft EIR is not being revised and republished.

PUBLIC REVIEW OF THE DRAFT EIR

On May 28, 1993, a Notice of Availability of a Draft Environmental Impact Report for the review of the Mono Basin Water Rights of the City of Los Angeles was filed with the Secretary for Resources and the draft EIR was distributed to the public.

Copies of the report were provided to 242 individuals and groups, based on a list of parties so requested during and after the public scoping process. Another 41 copies were transmitted to local, state, and federal agencies as required by law. More than 80 copies were provided to public and university libraries. The availability of the draft EIR was publicized in newspapers across the state and announcements were mailed to several hundred parties on a mailing list, which was compiled during and after the scoping process.

A 90-day review period was established, extending from May 28, 1993, to August 30, 1993. Readers of the draft report were asked to submit comments on its adequacy in writing by the close of the review period. Public hearings were not held on the EIR because they would have duplicated the water rights hearings that commenced on October 4, 1993. The first 3 days of the hearing, however, involved a public review of the draft EIR.

COMMENTERS ON THE DRAFT EIR

By the close of the comment period, a total of 4,075 letters had been received by the California State Water Resources Control Board (SWRCB). The letters were of two types. Approximately 4,000 letters contained recommendations to SWRCB concerning choice of alternative and related actions or approaches to the water rights issue. These letters did not comment on the adequacy or accuracy of the draft EIR. These recommendations have been brought to the attention of SWRCB.
A total of 74 letters were identified as containing comments on the accuracy and adequacy of the draft EIR. Some of these letters also contained recommendations. The sources of these letters were:

- water rights permittee (Los Angeles Department of Water and Power [LADWP]),
- two federal agencies,
- four state agencies (in addition to the State Clearinghouse),
- six local and regional agencies,
- 12 environmental organizations and their attorneys,
- seven other organizations, and
- 41 individuals.

These commenters are listed below, along with the number assigned by SWRCB to each commenter's letter.

**Water Rights Licensee**

Los Angeles Department of Water and Power  
James F. Wickser, Assistant General Manager - Water  
August 27, 1993 - letter  
Los Angeles, CA

**Federal Agencies**

U.S. Fish and Wildlife Service, Ecological Services  
Craig Faanes, Field Supervisor  
August 27, 1993 - letter  
Ventura, CA

U.S. Forest Service, Inyo National Forest  
Dennis W. Martin, Forest Supervisor  
August 30, 1993 - letter  
Bishop, CA

**State Agencies**

California Department of Fish and Game  
John L. Turner, Chief - Environmental Services Division  
August 30, 1993 - letter  
Sacramento, CA
California Department of Parks and Recreation
Donald W. Murphy, Director
August 25, 1993 - letter
Sacramento, CA

California Department of Water Resources
Robert G. Potter, Chief Deputy Director
August 26, 1993 - letter
Sacramento, CA

California Governor's Office of Planning and Research
Christine Kinne, Deputy Director, Permit Assistance
August 25, 1993 - letter
Sacramento, CA

State Lands Commission
Mary Griggs, Environmental Review Section - Division of Environmental Planning and Management
August 30, 1993 - letter and two attachments (includes comments from Scott Stine, Ph.D.)
November 9, 1993 - letter of clarification
Sacramento, CA

Local and Regional Agencies

California Regional Water Quality Control Board, Lahontan Region
Harold Singer, Executive Officer
August 30, 1993 - letter and three attachments
South Lake Tahoe, CA

City of Cerritos
Ann Joyn, Mayor Pro Tem
August 26, 1993 - letter
Cerritos, CA

County of Mono, Board of Supervisors
Andrea Lawrence, Supervisor, District 5
August 26, 1993 - letter
Mammoth Lakes, CA
Environmental Organizations

California Native Plant Society, Bristlecone Chapter
Carla R. Scheidlinger, Conservation Co-Chair
August 27, 1993 - letter
Bishop, CA

California Trout
Jim Edmondson, Vice President
August 30, 1993 - letter and six attachments
San Francisco, CA

Defenders of Wildlife
Richard Spotts, California Representative
August 23, 1993 - letter
Sacramento, CA

Desert Fishes Council
Edwin P. Pister, Executive Secretary
August 22, 1993 - letter
Bishop, CA

Environmental Defense Fund
Thomas J. Graff, Senior Attorney
August 27, 1993 - letter
Oakland, CA
Mono Lake Foundation
David Marquart, President
August 26, 1993 - letter
Lee Vining, CA

Morrison & Foerster, Counsel for the National Audubon Society
and the Mono Lake Committee
F. Bruce Dodge, Patrick J. Flinn, and Bryan J. Wilson, Attorneys
August 30, 1993 - letter
Palo Alto, CA

Natural Heritage Institute, Counsel for California Trout
Richard Roos-Collins, Cynthia Koehler, and
Michelle Schwartz, Attorneys
August 27, 1993 - letter and four attachments
San Francisco, CA

Natural Resources Defense Council
Everett DeLano, Staff Attorney, NRDC Urban Program, and
Hamilton Candee, Senior Staff Attorney, NRDC Western Water Project
August 30, 1993 - letter
San Francisco, CA

Sierra Club Legal Defense Fund
Laurens H. Silver, Counsel
August 27, 1993 - letter and one attachment
San Francisco, CA

The Desert Protective Council, Inc.
Douglas W. Allen, President
August 22, 1993 - letter
Valley Center, CA

Western Hemisphere Shorebird Reserve Network
Julie M. Sibbing, Program Manager
August 17, 1993 - letter
Manomet, MA

Other Groups

Committee to Save Crowley Lake
Randy Witters, President
August 24, 1993 - letter
Crowley Lake, CA
Haselton Associates, representing John Arcularius
Frank L. Haselton, Principal (and signed by other ranching interests)
August 25, 1993 - letter
Anaheim, CA

Inaja Land Company, Ltd.
Millard G. Reed, President
August 30 and September 8, 1993 - letters
Reno, NV

League of Women Voters of California
Marilyn Hempel, Natural Resources Director
August 23, 1993 - letter
Claremont, CA

Mono Lake Indian Community
William J. Andrews, Chairman
August 19, 1993 - letter
Lee Vining, CA

Trihey & Associates, representing the Planning Team of the Restoration Technical Committee
E. Woody Trihey, P.E.
August 30, 1993 - letter
Concord, CA

Yosemite Park and Curry Co.
Edward C. Hardy, President
August 18, 1993 - letter
Yosemite National Park, CA

Individuals

Except for the last three, individuals on this list are given in alphabetical order.

Mark Bagley
August 30, 1993 - letter
Bishop, CA

Dan Bean, Ph.D.
August 26, 1993 - letter
Chapel Hill, NC
Mr. and Mrs. Walter T. Hansen
August 23, 1993 - letter
Lee Vining, CA

David B. Herbst, Ph.D.
August 20, 1993 - letter and one attachment
Mammoth Lakes, CA

Robert and Harriet Jakovina
August 24, 1993 - letter
San Jose, CA

Emily S. Johnson
August 20, 1993 - letter
Bishop, CA

Sally Kabisch
August 20, 1993 - letter
Homer, AK

Richard Kattelmann
August 20, 1993 - letter
Mammoth Lakes, CA

Lawrence A. Lawver
No date - letter
Austin, TX

Anne Jones-Lee, Ph.D. and G. Fred Lee, Ph.D., D.E.E.
August 30, 1993 - letter
El Macero, CA

Nick Levinson
August 25, 1993 - letter
San Francisco, CA

Michael E. McLane
August 23, 1993 - letter
Concord, CA

Barbara G. Moore
August 25, 1993 - letter
Lee Vining, CA
Kathy Morey
August 24, 1993 - letter
Mammoth Lakes, CA

Phyllis Mottola
August 22, 1993 - letter
Bishop, CA

Edna L. Nicely
August 27, 1993 - letter
Lee Vining, CA

Kathleen Norton
August 30, 1993
Elk Grove, CA

Stephen Osgood
August 28, 1993 - letter
Washington, DC

Darrell G. Parcher
August 26, 1993 - letter
Location unknown

Katharine Ratliff
August 21, 1993 - letter
Napa, CA

Margaret Rubega
July 22, 1993 - letter and two attachments
Reno, NV

Donald W. Sada, Ph.D.
August 27, 1993 - letter
Bishop, CA

Alexander Saxton
September 17, 1993 - letter
Lone Pine, CA

Emilie Strauss
August 29, 1993 - letter
Berkeley, CA
IDENTIFYING MAJOR ISSUES

All EIR comment letters received were read by SWRCB staff and consultants. Individual comments were identified and enumerated within each letter, and each comment was assigned to a resource topic or legal issue. Specialists read all comments on topics for which they were responsible and, by grouping the comments, formulated statements of the 88 major issues that had been raised. Each major issue was carefully analyzed. These major issues are listed in Table 1-1 and are summarized and responded to in Chapter 4. Although recurrence of an issue was considered grounds for considering the issue "major", a single comment sometimes raised a major issue.

RESPONDING TO OTHER ISSUES

Some comments were not considered major and were responded to individually. These miscellaneous responses appear in Chapter 5 following reproductions of the comment letters. Still other
comments were determined not to require a response, primarily if they were recommendations, opinions, or advice, but also for other reasons noted below.

Coding of Comments and Responses

Comment Enumeration

To facilitate the response effort, codes to track individual comments, and responses to them, were written in the left and right margins of each comment letter.

The comment enumeration code consists of two parts: the first number, shown on the upper right-hand corner of each page, is the comment letter number and the second number, shown in the left margin of the letters, is the particular comment, usually in the order that it appears. In some cases, however, a comment is introduced and then explained more fully later in the letter. In these cases, the same comment number is used and "(cont)" indicates this situation.

Response Codes

The response codes, given in the right margin of the letters, are interpreted in Table 1-1. As shown in the table, some codes indicate major legal issues. Other major issues are organized by resource topic area, employing the same topic lettering system used in the draft EIR. Miscellaneous comments needing an individual response are coded with an asterisk following the topic letter.

Certain comments require special responses. These are given "Y" and "Z" response codes. The Y responses are useful to:

# acknowledge a recommendation or opinion,
# accept a factual correction,
# refer the commenter to a discussion in the draft EIR that already answers the comment,
# identify a request for information that is not germane to the SWRCB's decision, or
# identify a comment that was not understood.

The Z response code indicates a rhetorical comment.
In many cases, more than one response code appears in the right margin, indicating that the comment is responded to in more than one way.

**CONTENT AND ORGANIZATION OF FINAL EIR**

This two-volume final EIR consists of responses to comments on the draft EIR and presents a revised version of one of the environmentally superior alternatives. This alternative was addressed in detail in the draft EIR. The modifications are intended primarily to mitigate adverse effects related to loss of Mono Basin exports.

Each chapter is dedicated to this approach as follows:

**Volume 1**

- Chapter 2 is a summary of the proposed project, project objectives, and project alternatives considered in the draft EIR.

- Chapter 3 is a summary of major conclusion drawn from the environmental analyses. It was developed from summary tables that appeared in the draft EIR, as modified by pertinent information submitted in the comment process.

- Chapter 4 contains a discussion of the major issues raised during the review process and SWRCB's response to those issues.

- Chapter 5 is a presentation and discussion of the Modified 6,390-Ft Alternative.

**Volume 2**

- Chapter 6 contains copies of all letters commenting on the draft EIR with response codes shown in the margins; it also presents responses to the miscellaneous comments not considered in Chapter 4.

- Chapter 7 is the errata to the draft EIR, based on the foregoing comments and responses.

- Chapter 8 is a list of preparers of the final EIR.

- Chapter 9 is a bibliography of printed references and personal communications cited in the report.
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