

CALIFORNIA STATE LANDS COMMISSION

100 Howe Avenue, Suite 100-South
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Established in 1938

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June 29, 2020

File Ref: A2469

Saeed Jorat, PhD, PE
Eastern Sierra Environmental and Water Rights Group Manager
111 N. Hope St.
Los Angeles, CA 90012

VIA EMAIL (saeed.jorat@ladwp.com)

Subject: Pumping Test of Testing Well TW-East at Owens Lake - Revised Testing Plan

Dear Dr. Jorat:

California State Lands Commission (Commission) staff is in receipt of your letter, dated June 8, 2020 and the revised pumping testing plan for well TW-East on Owens Lake (Revised Proposal). Commission staff appreciates the opportunity to review and provide feedback on the Revised Proposal. Answering the questions of whether groundwater can and should be safely extracted from Owens Lake is of vital importance to the future of the Owens Valley. Commission staff anticipates providing substantive feedback on the Revised Proposal at a future date.

On February 5, 2020, LADWP submitted the initial application (A2469) to conduct the subject pumping test at TW-East. We understand that the Notice of Exemption (NOE) filed in Inyo County has been retracted and therefore the lease application is incomplete pending additional California Environmental Quality Act (CEQA) analysis. To continue processing the lease application, a CEQA analysis and appropriate document is required. Please provide an update on how LADWP plans to analyze the proposed pumping under CEQA and when Commission staff can anticipate a complete application.

Because the issue of groundwater pumping and its potential economic, environmental, and public health repercussions are such important issues in the Owens Valley, Commission staff feels it is prudent to engage a groundwater consultant to assist staff's review of the proposed application, including the pumping plan and Revised Proposal. While you requested comments on the Revised Proposal be provided by June 29, 2020, we will be unable to provide comments by that date. The application is incomplete pending submittal by LADWP of additional documents. Upon submittal, Commission

staff will resume processing the application and enlist our consultant. Commission staff look forward to providing comments to LADWP at a later date with the assistance of a groundwater consultant.

Should you have any questions or wish to discuss the pending lease application, please contact Public Land Management Specialist Drew Simpkin at 916-574-2275 or at drew.simpkin@slc.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'B. Bugsch', written in a cursive style.

Brian Bugsch, Chief
Land Management Division

cc: Drew Simpkin, CSLC
Richard Greenwood, CSLC
Trisha Moyer, CDFW (Patricia.Moyer@Wildlife.ca.gov)
Grace Holder, GBUAPCD (gholder@gbuapcd.org)
Anselmo G. Collins, LADWP (Anselmo.Collins@ladwp.com)



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November 2, 2020

Mr. Brian Bugsch, Chief
Land Management Division
California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, California 95825

Dear Mr. Bugsch:

Subject: Operational Test of Testing Well TW-E at Owens Lake - Updated Testing Plan

Thank you for your letter dated June 29, 2020, responding to the revised Testing Plan for a proposed six-month operational test of well TW-E at Owens Lake. The Los Angeles Department of Water Power (LADWP) received detailed comments from the Great Basin Unified Air Pollution Control District and Inyo County Water Department. LADWP conducted conference calls with the staffs of these agencies to discuss their comments and explored how to address them.

LADWP has updated the Testing Plan, which addresses comments and suggestions received. We believe addressing these comments should also address concerns that other stakeholders may have on the Testing Plan.

The updated Testing Plan has been uploaded to the Owens Lake Groundwater Development Program web page (www.ladwp.com/olg) and will be used as the basis for the preparation of the California Environmental Quality Act (CEQA) document; in this case, a Negative Declaration for the proposed operational test. The process of adopting a Negative Declaration will provide additional opportunity for the stakeholders to provide further comments and input to the Testing Plan. The negative Declaration is expected to be adopted in early 2021.

Once adopted, LADWP will submit the CEQA document to your agency, which should complete our application for a permit to conduct the proposed operational test. We look forward to address any questions and consideration by the California State Lands Commission.

Mr. Bugsch
Page 2
November 2, 2020

Meanwhile, if you have any questions or comments on the updated testing plan, please contact Dr. Saeed M. Jorat at (213) 367-1119.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Anselmo G. Collins', with a long horizontal flourish extending to the right.

Anselmo G. Collins
Director of Water Operations Division

SMJ:mt

c: Mr. Drew Simpkin, California State Lands Commission
Mr. Nelson O. Mejia
Dr. Saeed M. Jorat