



MONO LAKE COMMITTEE

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December 18, 2015

Mr. Jim Yannotta
Aqueduct Manager
Los Angeles Department of Water & Power
300 Mandich Street
Bishop, CA 93514

Dear Mr. Yannotta:

Subject: Temporary Urgency Flow Change Request for Rush Creek

The Mono Lake Committee supports the Los Angeles Department of Water & Power's (LADWP) application for a temporary urgency change petition (TUCP) of the required minimum winter base flows for Rush Creek. Based on our conversation with your staff, we understand LADWP is seeking approval to change the winter base flow release into Rush Creek in order to maintain a minimum constant release of 20 cfs until March 31, 2016, regardless of the elevation of Grant Lake Reservoir. This would be a change from the minimum release requirement of 36 cfs when Grant Lake Reservoir holds 11,500 acre-feet or more, and a change from the requirement that the release be equal to the Rush Creek inflow when the reservoir is below 11,500 acre-feet.

Need for the Temporary Urgency Change

The Mono Lake Committee has identified impending adverse conditions on Rush Creek and has discussed them with LADWP staff as well as Ross Taylor (Fisheries Stream Scientist). These conditions include:

- Due to extremely low inflows from Rush Creek (recently as low as 10 cfs), Grant Lake Reservoir appears likely to drop below 11,500 acre-feet of storage before the end of December 2015.
- A release of 10 cfs (the recent low inflow) is lower than the 25 cfs minimum winter flow set forth in the 2013 Mono Basin Stream Restoration Agreement and lower than the lowest flow of 15 cfs analyzed during the 2009 flow study, which was deemed undesirable by the Stream Scientists given the current state of the habitat in Lower Rush Creek.
- Following the minimum release requirement for when the reservoir is below 11,500 acre-feet would cause the reservoir to fluctuate around that level, causing releases to Rush Creek to fluctuate between as low as 10 cfs (when the reservoir is below 11,500 acre-feet) and 36 cfs (when the reservoir is above 11,500 acre-feet). This large and frequent fluctuation occurring in winter would be undesirable for the fishery.
- Over the last year and a half, Southern California Edison (SCE) has begun peaking its Mono Basin hydropower plants. Typical Rush Creek at Damsite flows (inflow to Grant Lake Reservoir) during these peaking operations have been as high as 80 cfs and as low as 10 cfs. Without a TUCP, the minimum

- winter flow in Rush Creek could fluctuate between as low as 10 cfs and 36 cfs.
- Lowering the minimum flow release to 20 cfs from 36 cfs when Grant Lake Reservoir holds 11,500 acre-feet of storage or more could increase storage and improve water temperatures during summer 2016, when the reservoir is expected to start out very low (near 11,500 acre-feet).

Effects of the Temporary Urgency Change

MLC has modeled a 20 cfs constant release between December 15 and March 31. The effect on March 31st reservoir storage would be to lower it from approximately 11,500 acre-feet under the current minimum flow rules to approximately 11,000 acre-feet, assuming average inflows remained near 15 cfs. The release to Rush Creek would remain relatively stable at 20 cfs instead of fluctuating between 10 cfs and 36 cfs. If inflows were to increase to above 20 cfs, the stability in the flow release would continue to be an advantage, as well as additional storage, which could benefit water temperatures and the fishery during the warm summer months (assuming GLOMP export guidelines are followed this year).

Communication

It is important for LADWP and the interested parties (MLC, CDFW, Caltrout, State Water Board-appointed Stream Scientists) to stay in close communication during the next few months. SCE's operations and wetter hydrologic conditions could lead to opportunities to release more than the minimum 20 cfs flow under the TUCP. On the other hand, if it is not a wet year, Grant Lake Reservoir storage is likely to be low next summer and managing the wintertime releases can help preserve reservoir storage as well as maintain better conditions in Rush Creek.

MLC is willing to be a resource for helping LADWP meet its requirements in the most efficient manner for both its operational and water supply needs and for the protection and restoration of the creeks and Mono Lake.

Conclusion

MLC is pleased that LADWP is willing to quickly submit a TUCP for this 20 cfs winter baseflow, since the alternative this winter would likely adversely affect the Rush Creek fishery. The recovery of the fishery has already been impacted by four years of drought and low Grant Lake Reservoir levels. Stabilizing winter base flows will prevent additional adverse conditions this winter for the trout.

If you have any questions, please free to contact me.

Sincerely,



Lisa Cutting
Eastern Sierra Policy Director



State of California – Natural Resources Agency
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EDMUND G. BROWN JR., Governor
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December 21, 2015

Ms. Barbara Evoy, Deputy Director
Division of Water Rights
State Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100

Dear Ms. Evoy:

Subject: Temporary Urgency Change Petition for Rush Creek Flow

The California Department of Fish and Wildlife (Department) would like to express its support for the Temporary Urgency Change Petition (TUCP) currently requested by Los Angeles Department Water and Power to modify the release requirements for Rush Creek (Mono County) pursuant to Decision 1631. The requested change would set and maintain the release from Grant Lake Dam at 20 cubic feet per second (cfs) regardless of reservoir storage and in-flow levels until March 31, 2016. This is in lieu of Decision 1631 which requires the licensee to match inflow or 36 cfs, whichever is less, when Grant Lake storage falls below 11,500 acre-feet (AF); and provide a constant release of 36 cfs while Grant Lake storage is above 11,500 AF.

The Department understands that Grant Lake Storage is likely to fall below the 11,500 AF threshold in the next two weeks. Recent inflows are reported as low as 11 cfs. The requested change will benefit Rush Creek by avoiding daily fluctuating flows, and potentially help to maintain higher reservoir levels in Grant Lake.

The Department appreciates your consideration of the TUCP and our letter of support. If you have questions or need additional information, please contact Mr. Steve Parmenter, Senior Environmental Scientist Specialist, at steve.parmenter@wildlife.ca.gov, 760-872-1123, or the letterhead address.

Sincerely

A handwritten signature in blue ink that reads "Heidi A. Calvert".

Heidi A. Calvert
Senior Environmental Scientist (Supervisor)

Cc Attached list

Conserving California's Wildlife Since 1870

Ms. Barbara Evoy, Deputy Director
Division of Water Rights
State Water Resources Control Board
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