State Clearinghouse Nos. 2011051068 and 2014071057

ADDENDUM TO ENVIRONMENTAL IMPACT REPORTS

OWENS LAKE PHASE 7a DUST CONTROL MEASURES PROJECT (2011051068) AND DUST MITIGATION PROGRAM – PHASE 9/10 PROJECT (2014071057)

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MISSION STATEMENT

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Latitude: N 36°26’12.80”
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Cover Photo: Owens Lake, Inyo County California

1.0 INTRODUCTION

1.1 SUMMARY AND PROJECT OBJECTIVES

On June 14, 1999, the California State Lands Commission (Commission) authorized the issuance of Lease No. PRC 8079.9, a 20-year General Lease – Public Agency Use (Lease), to the City of Los Angeles Department of Water and Power (City or LADWP) for the Owens Lake South Sand Sheet Air Quality and Sand Fence Effectiveness Monitoring System on Owens Lake, which is located in southwest Inyo County, approximately 200 miles north of Los Angeles (Figure 1). Since that time, the Commission has authorized 21 amendments to the Lease for the construction, operation, and maintenance of additional components of dust control, including the use of Best Available Control Methods (BACM) to mitigate dust emissions on Owens Lake. Approved types of BACM include Shallow Flooding, Managed Vegetation, and Gravel Cover.

On May 24, 2013, the City, as lead agency under the California Environmental Quality Act (CEQA), approved the Owens Lake Phase 7a Dust Control Measures Project (Phase 7a Project) and certified the Environmental Impact Report (EIR) (State Clearinghouse No. 2011051068).

On June 2, 2015, the City, as lead agency under CEQA, certified an EIR for the Owens Lake Dust Mitigation Program (OLDMP) — Phase 9/10 Project (State Clearinghouse No. 2014071057).

The Addendum addresses changes in the Owens Lake Dust Mitigation Program Phase 7a and 9/10 Projects being proposed by the City since approval of their associated EIRs and authorization by the Commission as a responsible agency under CEQA. Proposed changes to the Projects described in this Addendum include extended use and maintenance of sand fences, authorization for the continued use and maintenance of two currently unauthorized access roads in Dust Control Area (DCA) T37-2a (T37-2L1), installation and maintenance of a flood control system in DCA T2-1b (C2-L1), and authorization for the continued use and maintenance of 0.81 acres of currently unauthorized gravel cover in DCA T2-1b (C2-L1) and 1.46 acres of currently unauthorized gravel cover in DCA T2-1c (Duck Pond L1).

1.2 ADDENDUM PURPOSE

The proposed changes to the previously authorized Projects and their associated Mitigation Monitoring and Reporting Programs require Commission approval and therefore CEQA compliance. Pursuant to the State CEQA Guidelines section 15164, the lead agency or a responsible agency for a project shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions requiring preparation of a subsequent EIR (as described in State CEQA

Guidelines, § 15162) are present. Pursuant to State CEQA Guidelines section 15162, a subsequent EIR is not required unless:

(1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

A. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

B. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

To implement the proposed modifications to the previously approved Projects, the City has submitted an application to the Commission for the following:

- Extended use and maintenance of sand fences;
- Continued use and maintenance of two previously unauthorized access roads in DCA T37-2a (T37-2L1);
- Installation and maintenance of a flood control system in DCA T2-1b (C2-L1);
- Continued use and maintenance of 0.81 acres of unauthorized gravel cover in DCA T2-1b (C2-L1) and 1.46 acres of gravel cover in DCA T2-1c (Duck Pond L1); and

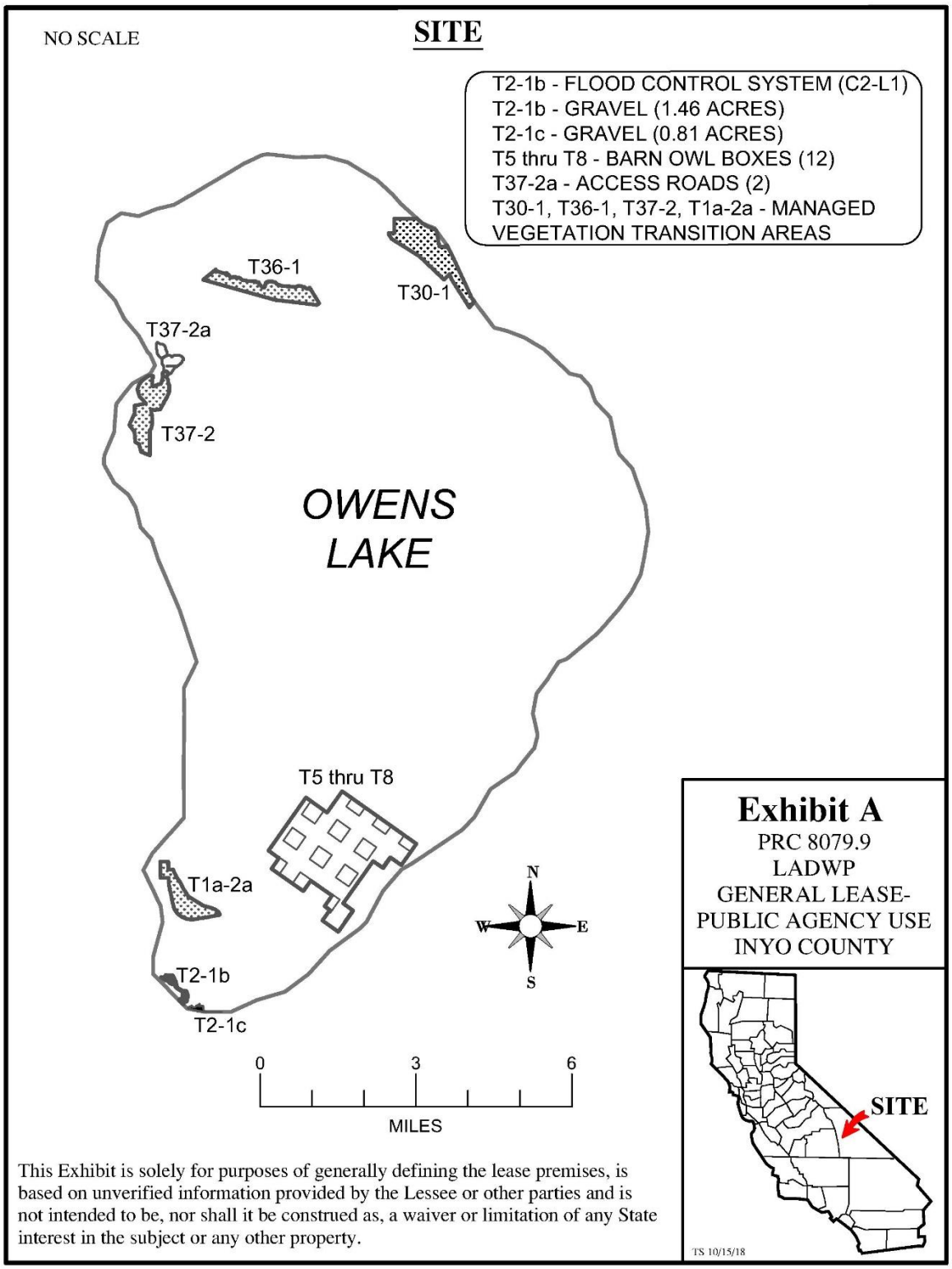
- Redesignation of existing Managed Vegetation and BACM Hybrid DCAs to Shallow Flooding.

Before approving such modifications, the Commission must apply the standards outlined above to ensure that a subsequent EIR is not required. As described in more detail below, Commission staff has determined, on the basis of substantial evidence in light of the whole record, that:

- minor changes or additions to the previously certified EIR for the Owens Lake Phase 7a Dust Control Measures Project are necessary;
- minor changes or additions to the previously certified EIR for the Owens Lake Dust Mitigation Program – Phase 9/10 Project are necessary;
- none of the conditions described in State CEQA Guidelines section 15162 calls for the preparation of a subsequent EIR; and
- an addendum is the appropriate CEQA document for analysis and consideration of the portion of the Projects on lands under the jurisdiction of the Commission.

Circulation of an addendum for public review is not required (State CEQA Guidelines, § 15164, subd. (c)); however, the decision-making body must consider the addendum in conjunction with the previously certified EIRs for the project (State CEQA Guidelines, § 15164, subd. (d)).

Figure 1. Project Location



1.3 BACKGROUND

Owens Lake was a natural and navigable waterway at the time of California's statehood and is thus sovereign land of the State under the jurisdiction of the Commission. Wildlife, waterfowl, and the nearby communities including the area's original Native American residents depended on and benefited from Owens Lake, which covered approximately 110 square miles and was 50 feet deep in places. Tribes have occupied the area for thousands of years, moving as the historical shoreline shrank and grew over time, using and stewarding the natural resources provided by the Lake, known to them as Patsiata. Early settlers diverted water from the Owens River to grow crops and irrigate pasture for livestock, and steamboats carried cargo across the lake. In 1908, the City began construction of an aqueduct to divert water from the Owens River north of Owens Lake. After completion of the Los Angeles Aqueduct in 1913, the City began transporting river water to Los Angeles, causing Owens Lake water levels to rapidly decline. By 1930, the Lake was virtually dry with only a small brine pool remaining. Since then, dust storms have carried away as much as four million tons of dust from the lakebed annually, causing respiratory problems for residents in the Owens Valley.

The U.S. Environmental Protection Agency has designated the southern part of the Owens Valley as a Serious Non-Attainment Area for PM_{10} (suspended particulate matter [dust] less than or equal to 10 microns in mean aerodynamic diameter [about 1/10 the diameter of a human hair]). The Great Basin Unified Air Pollution Control District (GBUAPCD or District) subsequently designated the Non-Attainment area as the Owens Valley PM_{10} Planning Area. The District determined that dust emissions from the dry lakebed of Owens Lake cause air in the Owens Valley PM_{10} Planning Area to exceed the PM_{10} national ambient air quality standards, and that water diversions by the City caused Owens Lake to become dry and the lakebed to be in a condition that produces dust. The District has authority to issue Supplemental Control Requirements Determinations (Orders) to the City for dust control purposes and recently approved the 2016 Owens Valley Planning Area PM_{10} State Implementation Plan (GBUAPCD 2016).

The City constructs and operates dust control measures (DCMs) on the Lake in compliance with Orders from the District under the authority of California Health and Safety Code section 42316, legal settlement agreements with the District, lease agreements for use of state lands (administered by the Commission), and other regulatory approvals. LADWP has also developed, in coordination with Commission staff and other stakeholders, a Habitat Suitability Model (HSM) for the Lake that includes various physical parameters that can be objectively measured as a means of predicting and monitoring habitat suitability and ensuring maintenance of wildlife habitat and use on the Lake.

2.0 DESCRIPTION OF PROJECT MODIFICATIONS AND ADDENDUM DETERMINATION

The following analysis was undertaken to analyze whether the modifications to the previously approved Projects proposed by the City, identified in Table 1, would have any new or substantially more severe potentially significant environmental impacts that were not addressed in the EIRs for Phase 7a and 9/10 certified by the City in 2013 and 2015, respectively. Commission staff determined the appropriate focus of this analysis, based on CEQA issue areas most likely to be implicated, would be on aesthetics, air quality, biological resources, and cultural resources. Based on substantial evidence gathered through examination of the City's previously certified EIRs and Commission staff's analysis of the anticipated environmental consequences of the requested lease amendments, along with consultation with CDFW, the District, and Tribal representatives, Commission staff determined that:

- Approval of the lease, as amended, would fall under the scope of the prior EIRs relied on by the Commission, as a responsible agency, on September 20, 2013 (Phase 7a) and August 19, 2015 (Phase 9/10); and

- While the lease amendment reflects some changes and additions that are necessary to successfully implement dust mitigation as compared to the originally certified EIRs, none of the events identified in CEQA section 21166 or CEQA Guidelines section 15162 has occurred or will occur due to the proposed amendments.

As noted above, if the proposed Project modifications do not involve new or substantially increased significant impacts resulting from a change in the project or a change in the circumstances under which a project will occur, but instead reflect minor changes or additions, CEQA Guidelines section 15164 directs lead or responsible agencies to prepare an addendum to the CEQA document. Pursuant to CEQA Guidelines section 15164, subdivision (e), which states that lead or responsible agencies shall provide an explanation of their decision not to prepare additional environmental analysis in a subsequent document, Commission staff evaluated the proposed modifications to the Projects and provides such explanations, below.

Table 1. Summary of Project modifications

EIR/Phase	DCA	Original Authorization	Proposed Amendment
7a	T37-2, T1A-2_a, T30-1, T36-1	BACM Hybrid or Managed Vegetation	Shallow Flood
9/10		Temporary black sand fences	Long-term, higher, playa-colored sand fences with corvid deterrent
9/10	T2-1b, T2-1c	Shallow Flood	Gravel Cover
9/10	T37-2a	Not specifically included but replacing roads not constructed as part of the original 9/10 plan	2 walking paths/ roads
9/10	T2-1b	Not included but necessary to protect larger dust control infrastructure	Flood control system (drainage ditch with berms and riprap lined slopes)

Redesignation from BACM Hybrid or Managed Vegetation to Shallow Flood

Shallow Flooding is a DCM that consists of releasing fresh and/or recycled water into a DCA and allowing it to spread, wet the surface, and thereby suppress windborne dust during the dust season (October 1st to June 30th). BACM Hybrid is a concept that incorporates a mix of DCMs, including Shallow Flooding, Managed Vegetation, and Gravel Cover. Managed Vegetation is a DCM that facilitates vegetation growth for the reduction of sand motion and soil erosion. This Addendum analyzes a proposed change to the Phase 7a Project to redesignate approximately 353 acres (0.55 square miles) of BACM Hybrid or Managed Vegetation DCAs to Shallow Flooding in order to maintain compliance with dust control standards.

The Phase 7a EIR described one new DCA (T37-2) as a mix of Shallow Flooding and Managed Vegetation as well as existing Shallow Flooding DCAs proposed to be redesignated to BACM Hybrid. Redesignating the Managed Vegetation portion of these DCAs back to Shallow Flooding was not described in the Phase 7a EIR. LADWP now proposes to manage portions of the DCAs, identified as “Challenging” (Formation Environmental, 2017) for vegetative cover targets and currently not meeting compliance according to the District, as Shallow Flooding. Approximately 287 acres (0.45 square miles) of the previously transitioned BACM Hybrid or Managed Vegetation areas within DCAs T36-1_b, T30-1 and T1A-2_a would be redesignated to Shallow Flooding. The remaining approximately 66 acres (0.10 square miles) located within DCA T37-2 would

either be managed as Shallow Flooding or be operated as part of the “Shallow Flooding Transition Zone”- anticipated to be vegetated or partially vegetated.

These proposed changes would not require any physical changes to the infrastructure at the Project location. Rather, these redesignations can be achieved by increasing watering using existing infrastructure. As a result, no new or more severe impacts are expected to cultural resources, and the Tribes did not object to this redesignation during Project coordination. Generally speaking, using the HSM developed to monitor habitat values on the Lake, Shallow Flood DCAs provide a higher habitat value to important bird guilds compared to managed vegetation, so no new or more severe impacts to biological resources would occur. Lastly, it is expected that because the Shallow Flooding would bring the DCAs into dust control compliance, air quality would be improved by this project modification. Based on the above facts, the proposed amendment would not create new significant environmental effects or an increase in the severity of previously identified significant effects as indicated in section 15162 of the CEQA Guidelines.

In the event that these areas are identified as candidates to meet vegetation coverage percentage goals in the future, LADWP may redesignate back to Managed Vegetation to ensure dust control compliance is met while also achieving water conservation.

Sand Fences

Section 3.1.5 of the Phase 9/10 EIR describes the dust control plan to be implemented during construction. Measures include installation of temporary sand fences strategically placed within the DCA being constructed. Sand intrusion from emissive areas adjacent to the DCAs has been heavier than anticipated. To minimize sand movement into areas of BACM sand fences will be located as noted in Table 2. Sand control is necessary to prevent covering of gravel within Gravel Cover BACM areas and burying of newly emergent vegetation in Managed Vegetation areas, which could cause the areas to become emissive and fall out of compliance.

Table 2. Phase 9/10 Extended Use Sand Fence Locations

DCA	BACM	Length	Reason Sand Fencing Proposed
T2-1c (Duck Pond L1)	Managed Vegetation	648.5 (new) 572.9 (retain existing)	Protect Managed Vegetation while it is becoming established and avoids impacting wetlands
T10-3a	Gravel	464.9 (retain existing)	Protect against high sand flux from the north
T15	Gravel	269.2 (retain posts only)	Posts will be retained to allow more rapid deployment of sand fences if adjacent areas become more emissive
T20	Gravel	656.8 (retain posts only)	Posts will be retained to allow more rapid deployment of sand fences if adjacent areas become more emissive
T22	Gravel	662 (retain posts only) 1,072.4	Protect against moderate to very high sand-flux potential
T32-2 West, T32-1	Gravel and Managed	3,540.7 (retain existing)	Protect against very high cumulative annual sand fluxes
T35-3	Gravel	684.4 (retain existing)	Protect north side of the DCA bordering uncontrolled playa

Sand fences are also referenced in EIR Section 4.2.7 in Mitigation Measure Air-1, which reads in part:

- Temporary sand fences shall be installed where feasible as soon as practicable without delaying Project completion and shall be maintained as necessary until areas of Managed Vegetation have been established. Sand fences may be used temporarily during construction in order to limit the movement of sand from construction zones to adjacent areas of the lake bed. Sand fence would be black fabric with 50 percent porosity that is UV stabilized (Model SF-50 from U.S. Fence, or equivalent) and supported by steel T-posts (approximately 7 feet in height and driven into the ground to a depth of approximately 4 feet, resulting in approximately 3 feet of height for exposed post). Since the fence will not exceed 60 inches in

height, wire or monofilament line across the top would not be necessary to reduce perching by predators (corvids). Temporary sand fence shall be maintained and then removed at the completion of construction activities. Sand fences that deteriorate and could potentially create litter on the lake bed shall be repaired or removed.

Revisions to the mitigation measure are required to reflect extended use of sand fences and to clarify design details of the fencing. The clarifications regarding fence color, bird avoidance structures and placement off the ground reflect input from LADWP biologists and consultations with Native American tribal representatives. The relevant part of the text of Mitigation Measure Air-1 is revised as follows with new or changed text in **bold**:

- Temporary sand fences shall be installed where feasible as soon as practicable without delaying Project completion and shall be maintained **in place as necessary to limit sand movement and dust generation.** Sand fences may be used temporarily during construction **and for an extended period during operation**. Sand fence material would have 50 percent porosity that is UV stabilized (Model SF-50 from U.S. Fence, or equivalent) and supported by steel T-posts (approximately 7 feet in height and driven into the ground to a depth of approximately **3 feet, resulting in approximately 4 feet of height for exposed post**). **New and replacement fencing will be playa-colored material. Pointed wood dowels will be installed on each fence post to prevent perching by *Corvids*, with the point of the dowel ending roughly 6 inches above the top of the fencepost.** Sand fences will maintain a 2-inch gap above the ground level to facilitate movement of Snowy Plover broods and other small animals. Fence panels will maintain 5-foot-wide gaps between each 100-foot set of panels to allow access pathways for larger animals. Sand fences that deteriorate and could potentially create litter on the lake bed will be repaired or replaced.

These proposed changes would require only minor physical changes to the infrastructure at the Project location. In addition, modifications to Mitigation Measure Air-1 ensure no new impacts to aesthetics, cultural, or biological resources. As a result, the proposed amendment would not create new significant environmental effects or an increase in the severity of previously identified significant effects as indicated in section 15162 of the CEQA Guidelines.

Gravel Cover BACM

The Phase 9/10 Project EIR summarizes the size of the DCAs included in the Project, the approximate area of the construction zone, and the BACM to be installed. As summarized in Table 3, below, three DCAs require small areas of Gravel Cover, called “gap areas,” to control dust emissions in select areas along the DCA perimeter. The gap areas are the

result of field conditions and engineering constraints for the installation of irrigation systems. Design drawings for these three DCAs indicate the small gap areas of Gravel Cover, which will correspondingly reduce the areas of Managed Vegetation (in T2-1b and T2-1c) and Shallow Flooding (in T37-2d).

Table 3. Gravel Cover BACM Areas

DCA	BACM	Additional Gravel Cover to fill Gaps (acres)	Rationale for Additional Gravel Cover
T2-1b (C2-L1)	Managed Vegetation	0.81 (1.6 % of the DCA)	Gravel added to gaps in select areas around the DCA perimeter to meet dust compliance requirements in the area between the end of the irrigation system and the DCA boundary.
T2-1c (Duck Pond L1)	Managed Vegetation	1.46 (1.4 % of the DCA)	
T37-2d (T37-2-L4)	Shallow Flooding	2.83 (2.4 % of the DCA)	Due to cultural resource concerns, the perimeter berm was rerouted and reduced in length by approximately 600 linear feet. A portion of the DCA adjacent to the area of concern fell outside of the revised berm boundary, leaving it without irrigation infrastructure. Therefore, Gravel Cover is needed for dust control in this area.

The previously approved Phase 9/10 Project includes over 3.6 square miles of Gravel Cover BACM. The modification to the Project Description identifies approximately 5 acres of Gravel Cover to fill gaps and control dust at the perimeter of three DCAs. The 0.2 percent increase in Gravel Cover area would be visually consistent with other dust control on the lake and would not significantly impact aesthetics because gravel from local sources is within the range of existing lake bed color Gravel Cover installation in the gap areas has also been located within the area of construction disturbance that has been previously surveyed for cultural resources. Installation of Gravel Cover in gap areas will reduce Managed Vegetation in T2-1b and T2-1c by 2.27 acres, and Shallow Flooding in T37-2d by 2.83 acres. Under the approved 9/10 EIR Project, the Avoidance Alternative, projected habitat value for the six bird species guilds modeled for habitat values on Owens Lake would increase from 29 to 350 percent over 2013 conditions. With minor reduction of Managed Vegetation and Shallow Flooding in approximately 5.1 acres (1.9 percent of

the area of the three DCAs), plus creation of walking paths/roads on 0.67 acres (0.6 percent of the Shallow Flood DCA) projected habitat values for the six species guilds modeled would still increase over 2013 conditions.

These proposed changes would require only minor physical changes to the existing DCAs, ensure the areas will not be emissive, will not degrade habitat values, and do not impact cultural resources. As a result, the proposed amendment would not create new significant environmental effects or an increase in the severity of previously identified significant effects as indicated in section 15162 of the CEQA Guidelines.

Walking Paths/Roads

Section 3.1.8 of the Phase 9/10 EIR describes Operations and Maintenance activities for the Project but did not include descriptions or analysis of two elevated berm paths necessary for accessing electrical handholes. During a site visit by Commission staff where these paths were observed, this discrepancy was identified, and staff requested the City apply for a lease amendment to obtain authorization for the paths, or otherwise remove the paths. In order to bring the paths under authorization in the lease, the Project Description for the Phase 9/10 Project is revised to add the following new Operations and Maintenance facilities:

- T37-2a (T37-2-L1): Two elevated (at berm level), rock-cap (9/16th rocks) walking paths/roads will allow access for Maintenance crews to electrical handholes within the sprinkler Shallow Flooding DCA. The paths are approximately 150 linear feet on the northeast and 1,000 linear feet on the east side of the DCA, respectively. The combined total area of the walking paths/roads is 0.67 acres.

Phase 9/10 of the OLDMP includes miles of new gravel berm roads and maintenance access roads. The addition of 1,150 feet of walking paths/roads for maintenance workers to access electrical equipment in T37-2-L1 are in areas previously surveyed for cultural resources and would be visually consistent with existing roads and pathways. These proposed changes would require only minor physical changes to the existing DCAs, will not degrade habitat values, and do not impact cultural resources. As a result, the proposed amendment would not create new significant environmental effects or an increase in the severity of previously identified significant effects as indicated in section 15162 of the CEQA Guidelines.

T2-1B Flood Control System

Section 3.1.6.1 of the Phase 9/10 EIR describes the drainage systems installed beneath Managed Vegetation fields and/or on the margins of Shallow Flood areas. Additional drainage facilities are required in T2-1b (C2-L1). During January and February 2017, when T2-1b was under construction, flooding from Cartago Creek inundated the Managed

Vegetation DCA. A temporary drainage ditch was installed to protect the site. To ensure that the site remains protected, it is necessary to install a permanent berm flood control system. Permanent drainage systems at T2-1b include approximately 1,000 linear feet of unlined ditch in the northwest area of the DCA and approximately 600 linear feet of unlined ditch in the southeastern portion. The berms will have riprap on one side to prevent erosion, as needed, banks will be sloped 3:1, and be entirely located within the construction limits and DCA boundary. The intent of the drainage system is to prevent excessive stormwater from entering the DCA, and thereby avoid damage to managed vegetation.

These proposed changes would require only minor physical changes to the existing DCAs, will not degrade habitat values, and do not impact cultural resources. Specifically, this modification was designed in coordination with the City's Biologist to ensure wildlife would not be able to become entrapped, and in coordination with Tribes to ensure the drainage system would discourage off-road vehicle traffic and potential looters. With respect to air quality, the drainage system would ensure the Managed Vegetation area is not inundated by floodwaters that would damage or kill the vegetation. As a result, the proposed amendment would not create new significant environmental effects or an increase in the severity of previously identified significant effects as indicated in section 15162 of the CEQA Guidelines.

3.0 CONCLUSION

Commission staff prepared this Addendum pursuant to Public Resources Code section 21166 and State CEQA Guidelines sections 15162 through 15164 (see Section 1.2, *Addendum Purpose*). As detailed in the explanations and facts presented in Section 2.0 above, this Addendum to the Phase 7a EIR certified by the City on May 24, 2013, and to the Phase 9/10 EIR certified by the City on June 2, 2015, supports the conclusion that the changes to the Project would not result in any new or substantially more severe significant environmental effects and do not represent a substantial change to the circumstances under which the Phase 7a and Phase 9/10 Projects are being carried out. In addition, Commission staff believes that no new information exists that would give rise to a new or substantially more severe significant environmental effect or that would affect the implementation or effectiveness of the previously adopted mitigation measures. In particular, the Projects are consistent with State CEQA Guidelines section 15164 in that only minor changes have been made to the Projects, and none of the conditions described in Public Resources Code section 21166 or State CEQA Guidelines section 15162 has occurred. Therefore, Commission staff recommends the Commission find that no subsequent or supplemental document is required.

4.0 ADDENDUM PREPARATION SOURCES AND REFERENCES

4.1 ADDENDUM PREPARERS

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4.2 REFERENCES

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