



(760) 878-0001
FAX: (760) 878-2552

P.O. Box 337
135 South Jackson Street
Independence, CA 93526
WEB: <http://www.inyowater.org>

COUNTY OF INYO WATER DEPARTMENT

May 28, 2021

Mr. Chris Ellis,
Site Manager Coso Operating Company, LLC
P.O. Box 1690
Inyokern, California 93527

Subject: Conditional Use Permit #2007-03/Coso – Extension of pumping based on 2021 update of the groundwater model.

Dear Mr. Ellis,

This letter is in reply to your December 29, 2020 request that an evaluation be performed to determine if Coso Operating Company's groundwater pumping can be extended after May 31, 2021. Pursuant to Conditional Use Permit #2007-03/Coso and the associated Hydrologic Monitoring and Mitigation Plan (HMMP), the groundwater pumping rate and duration are subject to restrictions based on ongoing analysis of monitoring data. In 2018, pumping for the project was continued through May 31, 2021, and approximately 1,807 acre-feet remain of the allowable pumping amount for the period. The state of the Rose Valley groundwater system is regularly monitored by Team Engineering which has reported that over the life of the project no Maximum Allowable Drawdown threshold in monitoring wells has been reached.

The Water Department concurred with your request for an evaluation via letter on January 29, 2021. The analysis recommended in the letter has been completed by the Water Department's consultant Daniel B. Stephens & Associates (DBS&A) and is described in the attached report. DBS&A updated the Rose Valley groundwater model to account measured water levels, surface water flows, pumping, recharge estimates through September 2020, and water spreading amounts in the basin in 2017. Simulations using the updated model showed the model performance was comparable to previous versions and recalibration was not necessary. Finally, predictive simulations were performed to assess whether pumping for the project could be extended and avoid exceeding the allowable 10% reduction in Little Lake outflow.

Two scenarios were evaluated to predict water levels and Little Lake outflow through 2047. One scenario assumed no additional project pumping, and the second scenario evaluated an additional 800 acre-feet/year of pumping for the next four years. Results showed that the maximum reduction in outflow at Little Lake in the second scenario was estimated to be 8.9% which is less than the HMMP limit. Maximum Allowable Drawdown levels in monitoring wells were recalculated based on the second

scenario and are included in Table 4 of the DBS&A report (note that Dunmovin and Cal Pumice wells are no longer accessible for monitoring).

Based on the modeling results, the Water Department approves the continuation of pumping to May 31, 2025 provided that maximum pumping is less than 800 acre-feet in any 12 month period between June 1 and the following May 31. This approval does not diminish the discretion afforded to the Water Department under Conditional Use Permit #2007-03 to further enforce or modify mitigation measures to protect the citizens, economy, and environment of the County.

Please feel free to contact me at (760) 878-0001 or asteinwand@inyocounty.us if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Aaron S". The signature is written in a cursive style with a long horizontal stroke at the end.

Aaron Steinwand, Director

cc: Inyo County Board of Supervisors
Inyo County Water Commission
Clint Quilter, County CAO
Marshall Rudolph, County Counsel
Cathreen Richards, Planning Director
Gary Arnold, Little Lake Ranch
Neil Blanford, Daniel B. Stephens & Assoc.
Greg Foote, Team Engineering