



April 17, 2024

Margo Regier  
National Academies of Sciences, Engineering, and Medicine  
500 Fifth St., N.W.,  
Washington, D.C. 20001

Re: Comments on Provisional Committee Appointments for Owens Lake Scientific Advisory Panel on Off-Lake Sources of Airborne Dust in Owens Valley, California

Dear Dr. Regier,

Thank you for the opportunity to submit these comments about the Provisional Committee Appointments for the Owens Lake Scientific Advisory Panel (OLSAP) studying off-lake sources of airborne dust in Owens Valley, California. Friends of the Inyo (FOI) is a grassroots non-profit organization based in the Owens Valley that represents over 1,000 members. Our mission is to protect and care for the land and water of the Eastern Sierra. Over our 38-year history, we have cared for this valley that suffers the destructive effects of water extraction by the Los Angeles Department of Water and Power (LADWP). We applaud this panel's work in studying the alternative dust control methods on Owens Lake, but **we are concerned about the implications of studying off-lake sources of airborne dust.** In terms of the committee's composition, we believe **it needs to include representatives who use Traditional Ecological Knowledge approaches in their work.**

First, we want to acknowledge the significant work that the OLSAP has already completed in its first task of producing the consensus report titled *Effectiveness and Impacts of Dust Control Measures for Owens Lake*. This report helps us to quantify and better understand the results of LADWP's dust control measures on the lake that it has built in the last twenty years. **We appreciate the dedication and investment of the OLSAP in creating this study.**

As stated in the description for this committee, one of its goals will be to evaluate if the EPA's Exceptional Events Policy applies to off-lake sources of dust. If the committee finds that this policy

applies to Owens Lake, **we are concerned that excluding air quality data may enable LADWP to decrease its investment in dust management.** The 2014 Stipulated Agreement that led to the creation of the OLSAP states that “additional issues for the NAS may be submitted to the Panel by the General Manager of the Los Angeles Department of Water and Power.”<sup>1</sup> Did LADWP suggest this second task for the panel? **We would like greater transparency in understanding how this second task was created and how the findings will be used.**

In terms of the composition of the committee, we believe that **the committee needs to incorporate practitioners of Traditional Ecological Knowledge (TEK).** According to the Traditional Ecological Knowledge Lab at Oregon State University, TEK is “defined as knowledge and practices passed from generation to generation informed by cultural memories, sensitivity to change, and values that include reciprocity... offering irreplaceable ecocultural knowledge that can be thousands of years old and incorporates values, such as kinship with nature and reciprocity, that can help restore ecosystems.”<sup>2</sup> This knowledge system aligns with the “landscape-based, systems approach” that the OLSAP advocates for in their report.<sup>3</sup> Incorporating TEK with more typical scientific approaches on this panel would improve the efficacy of this panel’s findings, because TEK better reflects the needs of the land itself. **Centering TEK could help this panel push LADWP out of their extractive mindset and reorient its commitment toward truly caring for our lands and waters.**

This committee also currently lacks Indigenous representation. We believe that this panel should reflect the diversity of peoples invested in Owens Lake, which includes the Native nations of the Owens Valley. **Please increase the number of Indigenous scholars on this committee.**

Thank you for considering these comments. We look forward to working together as this committee begins its second task. Please contact Lauren Kelly at [lauren@friendsoftheinyo.org](mailto:lauren@friendsoftheinyo.org) with any questions.

Sincerely,



Wendy Schneider  
Executive Director

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<sup>1</sup> Page 14, Stipulated Judgment for Respondent and Defendant Great Basin Unified Air Pollution Control District, 2014.

<sup>2</sup> “What is TEK?” *Traditional Ecological Knowledge Lab*, <https://tek.forestry.oregonstate.edu/what-tek>.

<sup>3</sup> Page 142, *Effectiveness and Impacts of Dust Control Measures for Owens Lake*, 2020.