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COUNTY OF INYO
WATER DEPARTMENT

April 30, 2014

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

Subject: Inyo County comments on LADWP's proposed Annual Operations Plan for Runoff Year 2015-2016

Dear Mr. Yannotta:

In accordance with Section V.D of the Inyo/Los Angeles Long Term Water Agreement, the following are the Inyo County Water Department's comments on LADWP's proposed Annual Operations Plan for Runoff Year 2015-2016 (proposed plan).

General Comments. Based on the proposed plan, we understand that total pumping for the period from April 1, 2015 through March 31, 2016 (2015 runoff-year) will be approximately 70,000 acre-feet (AF). The extremely low runoff forecast this year, following three years of low runoff, certainly presents challenges to meeting Water Agreement goals. These conditions stress native vegetation and also reduce water available for export to Los Angeles and for use in Owens Valley. We concur that the groundwater pumping in the proposed plan is substantially more conservative than pumping plans developed during the dry years of the early-1990's. Also, we concur that the provisions of Water Agreement section V.D require that the Annual Operations Plan for 2015-2016 require that the proposed plan be for the six-month period from April through September.

Water for use in Owens Valley. Table 7 of the proposed plan shows a 65% reduction in irrigation from the amount supplied in 1981-1982. We recognize the severity of the current drought; however, these conditions do not abrogate the Water Agreement's requirement that reductions in irrigation be approved by the Inyo County Board of

Supervisors acting through the Standing Committee. The Water Agreement (Section IV.A) provides:

> *The Department shall continue to provide water for Los Angeles-owned lands in Inyo County in an amount sufficient so that the water related uses of such lands that were made during the 1981-82 runoff year can continue to be made. The Department shall continue to provide water to Los Angeles-owned lands in the Olancha/Cartago area such that the lands that have received water in the past will continue to receive water. Additionally, the Department shall provide water to any enhancement/mitigation projects added since 1981-1982, unless the Inyo County Board of Supervisors and the Department agree to reduce or eliminate such water supply.*
>
> *It is recognized that successive dry years could result in insufficient water to meet all needs. During periods of dry year water shortages, the Technical Group will evaluate existing conditions. A program for reasonable reductions in irrigation water supply for Los Angeles-owned lands in the Owens Valley and for enhancement/mitigation projects may be implemented if such a program is approved by the Inyo County Board of Supervisors and the Department, acting through the Standing Committee.*

The proposed plan would implement a program for reductions in irrigation water supply for Los Angeles-owned lands without approval of the Board of Supervisors or Standing Committee. We are fully cognizant of the severity of the current drought and the need for reasonable reductions in irrigation water supplied to Los Angeles-owned lands in Owens Valley, and the Board of Supervisors has been briefed on statewide and local drought conditions multiple times. Although there is a need for drought-related reductions in irrigation water supplies, unilateral reductions to irrigation by LADWP without meeting the requirements of Water Agreement Section IV.A for joint approval of reductions to irrigation are a flagrant violation of the Agreement.

Table 7 and Table ES.2 of the executive summary of the draft Annual Report show that other uses in the Owens Valley will be subject to smaller reductions relative to the planned reduction for irrigation. The County intends that LADWP, other MOU parties, and others with interests in water use in Owens Valley work together to more equitably distribute reductions among the uses shown in Table 7 and Table ES.2. To promote a discussion on this matter, the Board of Supervisors convened a workshop on April 28, 2015 to have an open public discussion of how such a solution might be achieved. We thank you for your attendance and candid input at the workshop. It was clear from the discussion at the workshop that potential exists for reallocating the in-valley uses given in Table ES.2, principally by modifying dust control operations on Owens Lake. At the

workshop, the Air Pollution Control Officer from the Great Basin Unified Air Pollution Control District indicated that early ramp-down of shallow flooding could conserve 5,600 acre-feet, and delayed ramp-up could conserve considerably more water. It has long been the County's policy to support LADWP's efforts to conserve water used on Owens Lake, and we urge that LADWP work quickly with the Air Pollution Control District, the State Lands Commission, and other agencies to immediately take steps to conserve water on Owens Lake. Some water savings may be obtainable in certain enhancement/mitigation projects, the Lower Owens River Project, recreation projects, or the 1,600 acre-feet projects. We are developing some proposals for consideration by the Technical Group for projects where the water supply could be reduced to allot more water to irrigation.

Analysis of the proposed plan. In order to analyze the proposed plan, we extrapolated the six months of pumping described in the proposed plan out to the end of the 2015 runoff year to allow us to use regression models for indicator wells to estimate water table conditions in April 2016. The proposed plan indicates that pumping for the entire 2015 runoff year will be in the 70,000 AF range. To analyze the proposed plan, the Water Department estimated water table changes due to pumping 70,000 AF and for 53,365 AF (estimated lower end range proposed by LADWP).

The models ICWD used to analyze the proposed plan predict water levels one year in the future (e.g. April 2015 through March 2016) based on annual pumping for each well field. The models cannot be used to analyze changes over a shorter period. However, the information provided in the pumping plan allows us to estimate annual pumping with sufficient accuracy to apply the models. The model-based predicted values are within 1 foot of the actual values on average.

Estimated October-March pumping was added to the proposed high and low ranges of pumping provided in the LADWP plan to derive the annual estimates for the modeling analysis (Table 1). Minimum pumping during the fall and winter months is approximately 17,415 AF. That estimate for winter pumping consists of supply for town use, fish hatcheries, stock water, and environmental projects. We assumed there will not be an extension of irrigation reliant on pumped water into October. The sum of the low range proposed summer pumping and minimum pumping during the winter was 53,365 AF, almost the same as the minimum annual pumping estimated by the County in past years (54,535 AF). The sum of the high range of proposed summer pumping and the minimum pumping during the winter is approximately 66,285 AF. In our analysis, the difference from the projected annual total of 70,000 ac-ft (3,715 AF) was apportioned during the winter months among wellfields with On-status or exempt wells (Big Pine, Taboose-Aberdeen, Independence-Oak, Symmes-Shepherd, and Bairs-George). Actual pumping distributions among well fields may differ from the modeled

values, but the assumptions to derive the values in Table 1 are reasonable enough to use the models to evaluate the proposed plan. LADWP could chose to allocate the 3,715 AF of pumping to a single wellfield, which would result in water levels in the aforementioned wellfields that are 0.3 to 1 foot deeper on average than the values presented here.

Table 1. Estimated maximum and minimum pumping totals for runoff-year 2015 evaluated using the regression models. Values are in acre-feet. Regression modeling was not completed for Bishop because pumping in that well field must comply with the Hillside decree and for Lone Pine because the proposed pumping is for mitigation and town supply only.

Wellfield	**LADWP proposal: high**	**LADWP proposal: low**
	ac-ft/year	ac-ft/year
Laws	7,350	5,910
Bishop	10,800	9,240
Big Pine	22,500	20,550
Taboose-Aberdeen	6,855	1,590
Thibaut-Sawmill	8,300	8,000
Ind.-Oak	9,000	5,660
Symmes-Shep.	3,140	960
Bairs-George	1,155	660
Lone Pine	900	795
Sum	70,000	53,365

Well field specific conditions. The following presents a summary of conditions in each well field, LADWP's proposed pumping, predicted effects of the proposed pumping, and the County's comments on LADWP's proposed operations for each well field. In the discussion below, 'baseline water levels' are the average of April water levels for 1985, 1986, and 1987, and 'baseline vegetation conditions' refer to the conditions documented in the baseline maps attached to the Water Agreement as Exhibit A. Predicted water table changes discussed below are based on the pumping amounts given in Table 1 totaling 70,000 AF.

Predicted water table changes at monitoring sites are based on correlations between wells at monitoring sites and nearby indicator wells. The Water Department's April 2015 water level measurements are attached as Table 2, and multiple linear regression model results are attached as Table 3. Feel free to have your staff contact the Water Department should you have any questions concerning the methods used by the Water Department.

Laws. LADWP proposes to pump between 5,760 – 7,200 AF through September in the Laws well field to supply Owens Valley demands including town water systems, irrigation, and enhancement/mitigation (E/M) projects. There is a discrepancy between the pumping amounts discussed in the wellfield narrative (5,960-7,400 AF) and Tables 2.3 and 2.6 (5,760-7,200). Please clarify what is the intended range in the proposed pumping. The Water Department analyzed the values in Tables 2.3 and 2.6. Last year, 6,290 AF were pumped from Laws, resulting in water table declines in indicator monitoring wells ranging from 0.33 feet to 1.17 feet (Table 2). Water levels range from 3.7 to 12.2 feet below baseline. As of 2014, 8 Laws wellfield vegetation parcels were below baseline (Table 4). Four parcels that were below baseline in 2013 were not surveyed in 2014 owing to staff shortage and these parcels are likely still below baseline.

The proposed high range of pumping appears to accommodate irrigation, town, and mitigation project needs in Laws. Predicted water levels are expected to rise or decline slightly (depending on location) if these projects are fully supplied with pumped water. LADWP announced at the Inyo County Board of Supervisors April 28 workshop that pumping in Laws will be diverted to supply dust mitigation on Owens Lake after the planned irrigation shut off on May 1. LADWP has not requested, nor has the Board of Supervisors approved, a reduction in irrigation or mitigation project supply. If reduced water supply to these projects is contemplated, the applicable procedures in the Water Agreement must be followed. If these uses in Laws are not fully supplied in 2015, the amount of groundwater pumping in Laws should also be reduced. We do not object to pumping approximately 7,200 ac-ft to supply irrigation, town supply, and E/M projects in Laws.

Bishop. LADWP proposes to pump 7,200-9,000 ac-ft from Bishop through September. Figure 2.5 of the Operations Plan suggests that annual pumping will be approximately 10,400 ac-ft. Last year, 10,471 AF was pumped from Bishop. Vegetation parcel FSL123 has been below baseline perennial cover for the past three years.

In accordance with the Hillside Decree, groundwater extracted must be less than water used on the Bishop Cone. Given the extremely low runoff, it is expected that the amount of surface water diverted for uses on the Bishop Cone will decline approximately 7,000 AF (proposed plan, Fig. 2.5). On March 17, 2015, the Inyo County Board of Supervisors approved a 23% reduction in irrigation on the Bishop Cone. Our current understanding is that LADWP will not agree to Standing Committee approval of this reduction because it is uncertain whether actual uses will fall short or exceed the reduced irrigation amount approved by the Board.

It appears from Figure 2.5 that proposed pumping for the year will be compliant with the Hillside Decree although the planned uses and pumping differ only by approximately 3,000 AF. Given the uncertainty in the amount of surface water available for irrigation on the Bishop Cone this summer, LADWP should provide the Water Department monthly totals of uses and pumping to track progress in complying with the Hillside Decree. Planned pumping for the summer is approximately the full wellfield capacity, but relatively little pumping is conducted during winter months, mostly for stock water uses. It will not be possible to reduce the pumping rate during winter should the summer pumping greatly exceed surface water supplied for irrigation.

We do not object to the proposed pumping providing it complies with the Hillside Decree. Concerning LADWP's claim that the Bishop Cone Audit does not account for known uses and losses, any proposed changes to the audit protocol to better account for uses and losses should be described in detail in a report to the Technical Group. We encourage LADWP to work with other water management entities and water rights holders on Bishop Creek to reach equitable solutions on the Bishop Cone. We also request that stock water uses on the Bishop Cone be supplied fully.

Big Pine. LADWP proposes to pump between 10,200 and 11,680 AF from the Big Pine well field through September contingent on water needs and environmental conditions. We believe this amount includes hatchery and town supply as well as several months of operation of exempt wells W218 and/or W219. Last year, 21,633 AF were pumped from Big Pine, resulting in water table changes at monitoring sites and in indicator monitoring wells ranging from -1.57 to 0.97 feet (negative denote declining water level). Indicator monitoring wells were 3.80 to 7.13 feet below their baseline water levels. Well field parcel BGP162 has been below baseline for over a decade and BGP154 and TIN028 declined below baseline in 2014. Proposed pumping is predicted to result in water table changes ranging from an increase of 0.35 to a decrease of 1.65 feet, resulting in water tables 3.94 to 9.31 feet below baseline.

Almost all of the irrigated lands in the Big Pine wellfield are supplied by surface water. The plan to discontinue irrigation on May 1 will curtail the amount of recharge in the wellfield. While the LTWA mining provisions have not been exceeded, the Big Pine wellfield has accumulated a groundwater deficit since the onset of the current drought. In order to ameliorate the increasing groundwater deficit and the decline in water levels, the Water Department recommends pumping be reduced by 500 AF.

Taboose-Aberdeen. LADWP proposes to pump between 1,440 and 5,480 AF in the Taboose-Aberdeen well field through September. Last year, 7,225 AF were pumped from Taboose-Aberdeen, resulting in water table changes at monitoring sites and in indicator monitoring wells ranging from an increase of 4.63 feet to a decrease of 0.79

feet. Water levels ranged from 1.06 to 4.85 feet below baseline water levels. In 2014, eight reinventoried well field parcels were significantly below baseline in the Taboose-Aberdeen (TA) well field. BLK021 has been below baseline for the last eight years. BLK009, BLK033, and TIN068 have been below baseline for the past three years; and BLK002, BLK039, TIN050, and TIN068 dropped below baseline in 2014. LADWP's proposed pumping is predicted to result in water table changes ranging from an increase of 0.67 to a decrease of 1.54 feet, resulting in water tables 0.17 to 5.52 feet below baseline. The indicator well models for Taboose-Aberdeen do not include Blackrock Hatchery pumping, yet that pumping affects the southern portion of the well field (the effect of hatchery pumping has been nearly constant until 2014-15). Test wells in the southern portion of this wellfield rose more than 4 feet following the reduction in pumping in the Blackrock Hatchery, which, as anticipated, was not accurately predicted by our models. Since we expect continued recovery until water levels equilibrate with the reduced hatchery pumping, model predictions for three wells were not completed this year. The Water Department does not object to LADWP's proposed pumping.

Thibaut-Sawmill. LADWP proposes to pump 4,000-4,300 AF in the Thibaut-Sawmill well field through September. Last year, 8,557 AF were pumped, resulting in water table changes at monitoring sites and in indicator monitoring wells ranging from -0.24 to 10.22. Well 415T is located approximately 600m from the hatchery wells, and the water table rose much greater than predicted when the hatchery pumping was reduced. It is expected that the indicator well models based on wellfield pumping will perform poorly when pumping in close proximity to the test well deviates substantially from what typically pumped in the past. Water levels ranged from 3.64 feet above to 2.23 feet below baseline water levels. In 2014, five well field parcels were significantly below baseline. BLK075 has been below baseline for six years, BLK077 and BLK096 have been below baseline for three years and BLK093 dropped below baseline in 2014. BLK094 has been below baseline for 14 years. LADWP's proposed well field pumping is predicted to result in water table changes ranging from an increase of 0.68 to 3.45 feet, resulting in water tables ranging from 0.32 to 1.22 feet above baseline. We expect the water tables to rise in 415T, but for the reasons stated above, the model predictions are uncertain.

The Water Department does not object to LADWP's proposed pumping, and supports using on-status available pumping capacity to supplement surface-water supplied irrigation in the event that surface water is not available.

Independence-Oak. LADWP proposes to pump between 5,280 and 7,200 AF in the well field through September. Last year, LADWP pumped 8,606 AF, resulting in water table changes at monitoring sites and in indicator monitoring wells ranging from -1.39 to

0.83 feet. The water table ranged from 3.9 to 11.59 feet below baseline water levels. Vegetation parcels IND035 and IND111 dropped below baseline in 2014. LADWP's proposed pumping is predicted to result in water table changes ranging from an increase of 0.34 feet to a decrease of 2.57 feet at indicator wells and monitoring site IO1, and the resulting water tables would be 3.91 to 12.46 feet below baseline.

The Water Department does not object to LADWP's proposed pumping if it is to provide irrigation, E/M project, and town supply uses. If these uses in Indepence-Oak are not fully supplied in 2015, the amount of groundwater pumping in Independence-Oak should also be reduced. The proposed plan designates pumping from this wellfield as including municipal as well as town supply. Please clarify what municipal supply refers to and whether it should be distinguished from town (presumably Independence) supply.

Symmes-Shepherd. LADWP proposes to pump between 960-2,660 AF from the Symmes-Shepherd well field through September. Last year, LADWP pumped 1,808 AF from Symmes-Shepherd, resulting in water table changes at monitoring sites and in indicator monitoring wells ranging from -0.62 to 2.48 feet (negative values denote a decline). Water table levels range from 3.39 to 19.18 feet below baseline levels. Shrub cover in parcel IND132 has significantly increased since baseline. LADWP's proposed pumping is predicted to result in water table changes ranging from an increase of 0.51 feet to a decline of 1.18 feet at indicator wells and monitoring sites resulting in water tables 2.88 to 22.9 feet below baseline. Vegetation conditions in IND132 and IND139 near monitoring sites SS1 and SS3 have also declined in 2015.

The Water Department does not object to LADWP's planned pumping, and support using W402 to supply irrigation at the Symmes-Shepherd Enhancement/Mitigation Project. Well W402 can be operated only to supply the E/M project. LADWP has not requested a reduction in irrigation or mitigation project supply. If reduced water supply to this project is contemplated, the applicable procedures in the Water Agreement must be followed and planned wellfield pumping reduced.

Bairs-Georges. LADWP proposes to pump between 660 and 900 AF in the Bairs-Georges well field through September. Last year, LADWP pumped 828 AF from the well field, and the water table changed -0.25 to 0.58 feet in indicator monitoring wells. Water levels in indicator monitoring wells ranged from 0.83 feet below to 0.31 feet above their mid-1980's baseline levels. Vegetation parcel MAN007 is below baseline perennial cover. LADWP's proposed pumping is predicted to increase the water table elevation by 0.31 feet in one well and decrease the water table elevation by 0.69 feet in another well, resulting in water tables 0.38 to 0.52 feet below baseline.

The Water Department does not object to LADWP's proposed pumping. Well W343 is exempt for irrigation in below average runoff years, and should be operated to supply pasture irrigation and stock water during the summer. If these uses will not be supplied, W343 should not be operated.

Lone Pine. LADWP proposes to pump 600 AF from the Lone Pine well field through September. The monthly pumping during the irrigation season seems too low to include E/M and town supply. Will the full allotment of groundwater be supplied to the Van Norman E/M project and the FFA farm from W425? Last year, LADWP pumped 954 AF. The Water Department has not developed indicator well models for the Lone Pine well field because of the absence of discretionary pumping in the well field. In 2014, perennial cover in LNP045, classified as Nevada saltbush meadow, was significantly below baseline.

The Water Department does not object to LADWP's proposed pumping in the Lone Pine well field.

Editorial Corrections. Table 2.2 is for April 1, 2014. Please replace with the correct table. The row sums in Table 2.6 are incorrect. Replacement of well 365W has been completed (p.2-12).

We look forward to addressing these comments at a Technical Group meeting. If you wish to discuss these comments prior to the Technical Group meeting, feel free to contact me.

Sincerely,

Robert Harrington, Water Director

cc: Inyo County Board of Supervisors
Inyo County Water Commission
Kevin Carunchio, County CAO
Marge Kemp-Williams, County Counsel
Greg James, Special Counsel

Table 2. Depth to Water (DTW) at indicator wells, April 2014. All data are in feet. A negative change from April 2013 indicates a water table decline; negative deviation from baseline indicates the water table is below baseline. Depths are from reference point on the test well. Baseline DTW is the mean April DTW for 1985, 1986, and 1987. Where baseline elevation at monitoring sites does not exist, baseline DTW was predicted from monitoring site/indicator wells regression models.

Well ID	April 2015 DTW	Change from April 2014	Deviation from Baseline
Laws			
107T	36.44	-1.17	-12.17
436T	13.66	-0.69	-5.56
438T	16.18	-0.44	-6.58
490T	17.50	-0.83	-4.43
492T	36.53	-0.33	-3.73
795T, LW1	Dry		
V001G, LW2	Dry		
574T, LW3†	17.30	-0.63	-4.08
Big Pine			
425T	22.03	-0.74	-7.13
426T	17.19	-0.90	-5.62
469T	25.49	-0.12	-3.82
572T	16.05	0.97	-4.15
798T, BP1	20.42	0.26	-4.28
799T, BP2	22.47	-0.53	-4.10
567T, BP3	21.63	-1.57	-7.66
800T, BP4	20.26	-0.73	-6.72
Taboose Aberdeen			
417T	29.93	4.63	-2.96
418T	10.10	-0.30	-1.87
419T	9.07	-0.30	-2.44
421T	38.55	-0.77	-4.20
502T	12.34	-0.79	-4.85
504T	12.99	-0.48	-2.22
505T	21.85	4.39	-3.25
586T, TA4	10.43	-0.40	-2.14
801T, TA5	16.72	-0.52	-1.06
803T, TA6	11.72	4.16	-3.29
Thibaut Sawmill			
415T	14.86	10.22	3.64
507T	5.03	0.24	-0.36
806T, TS2	14.67	-0.24	-2.23

Well ID	April 2015 DTW	Change from April 2014	Deviation from Baseline
Independence Oak			
406T	5.87	-1.39	-4.30
407T	15.65	-0.12	-8.35
408T	7.03	0.30	-3.90
409T	13.19	0.83	-11.59
546T	10.85	-0.95	-7.42
809T, IO1	15.82	-0.81	-9.89
Symmes Shepherd			
402T	12.02	-0.36	-3.99
403T	9.03	-0.47	-3.70
404T	7.01	-0.09	-3.44
447T	42.97	2.48	-21.10
510T	8.39	-0.75	-3.39
511T	9.71	-0.62	-5.08
V009G, SS1	25.14	0.92	-19.18
646T, SS2	Dry		
Bairs George			
398T	6.04	0.58	0.31
400T	7.13	-0.25	-0.83

†: The new test well at LW3, 840T, tracks 574T except during active spreading on the site, and depth to water is on average 1.23ft deeper.

Table 3. Predicted changes in depth to water (DTW) at indicator wells and monitoring sites for LADWP's proposed annual operations plan for 2014 and estimated minimum pumping required for sole source uses. Negative values denote a decline. Baseline is the average of April water levels in 1985-87. DTW changes are in feet.

Station ID, Monitoring site	Predicted change in DTW: 70,000ac-ft	Predicted change in DTW: 53,365 ac-ft	2016 predicted dev. from baseline: DWP high
Laws			
107T	1.82	2.32	-10.35
436T	0.40	0.62	-5.16
438T	0.42	0.61	-6.15
490T	-0.31	-0.21	-4.74
492T	-0.76	0.02	-4.49
795T, LW1	Dry	Dry	Dry
V001G, LW2	Dry	Dry	Dry
574T	0.74	0.81	-3.35
Big Pine			
425T	-1.36	-1.04	-8.49
426T	-0.91	-0.72	-6.53
469T	-0.12	0.07	-3.94
572T	-0.58	-0.21	-4.73
798T, BP1	0.35	0.65	-3.93
799T, BP2	0.03	0.23	-4.07
567T, BP3	-1.65	-1.37	-9.31
800T, BP4	-0.99	-0.70	-7.71
Taboose Aberdeen			
417T	NA	NA	NA
418T	-0.64	-0.07	-2.51
419T, TA1	-1.38	0.00	-3.82
421T	-1.33	0.08	-5.52
502T	-0.33	0.32	-5.18
504T	-1.53	0.19	-3.75
505T	NA	NA	NA
803T, TA6	NA	NA	NA
586T, TA4	-0.62	0.54	-2.76

Station ID, Monitoring site	Predicted change in DTW: 70,000ac-ft	Predicted change in DTW: 53,365 ac-ft	2016 predicted dev. from baseline: DWP high
801T, TA5	0.67	1.00	-0.17
Thibaut Sawmill			
415T	NA	NA	NA
507T	0.68	0.73	0.32
806T, TS2	3.45	3.54	1.22
Ind. Oak			
406T	0.15	0.54	-4.15
407T	0.30	1.41	-8.05
408T	-0.02	0.74	-3.91
409T	0.34	3.12	-11.25
546T	-0.31	0.21	-7.73
809T, IO1	-2.57	-1.72	-12.46
Symmes Shepherd			
402T	-0.10	0.15	-4.09
403T	-0.15	0.54	-3.85
404T	0.46	0.72	-2.98
510T	0.51	0.76	-2.88
511T	0.51	0.77	-4.57
447T	-1.18	0.40	-22.9
646T, SS2	Dry	Dry	Dry
V009G, SS1	0.22	1.60	-18.97
Bairs George			
398T	-0.69	-0.05	-0.38
400T	0.31	0.43	-0.52

Table 4. Number of consecutive years (2014 inclusive) that perennial vegetation cover has been significantly below baseline perennial cover. Comparisons to baseline were made using Welch's t-test for unequal variance with a significance level of 0.05.

Wellfield	Parcel	Number of consecutive years below baseline
Laws		
	LAW052	18
	LAW062	15
	LAW063	3
	LAW065	6
	LAW078	6
	LAW082	6
	LAW122	1
	LAW137	1
Bishop		
	FSL123	3
	BIS085	1
	FSL116	1
Big Pine		
	BGP162	14
	BGP154	1
	TIN028	1
Taboose-Aberdeen		
	BLK021	8
	BLK009	3

Wellfield	Parcel	Number of consecutive years below baseline
	BLK033	3
	TIN064	3
	BLK002	1
	BLK039	1
	TIN050	1
	TIN068	1
Thibaut-Sawmill		
	BLK094	14
	BLK075	6
	BLK077	3
	BLK096	3
	BLK093	1
Independence-Oak		
	IND035	1
	IND111	1
Bairs-George		
	MAN007	3
Lone Pine		
	LNP045	1