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COUNTY OF INYO
WATER DEPARTMENT

October 29, 2015

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 the second six months of 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 the "Los Angeles Department of Water and Power's (LADWP) Annual Operations Plan for the Second Six Months – October 1, 2015, through March 31, 2016" (Plan).

General Comments. Based on the Plan, we understand that total pumping for the period from April 1, 2015 through March 31, 2016 (2015 runoff-year) will be in the range 60,675 – 75,285 acre-feet (AF). The extremely low runoff 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 believe that these pumping levels are reasonable given current conditions. A general question we have concerning this plan is: why is the range in planned pumping so wide?

Analysis of the proposed plan. In order to analyze the proposed plan, we added the proposed pumping for each well field to the pumping reported on LADWP's Los Angeles Aqueduct web page to allow us to estimate water table conditions in April 2016. The proposed plan indicates that pumping for the entire 2015 runoff year will be in the 60,675 – 75,285 AF range. To analyze the proposed plan, the Water Department

estimated water table changes due to pumping 60,675 and 75,285 AF (estimated lower and upper end of the range of pumping in the Plan).

ICWD used regression modeling of indicator wells in each well field to predict water levels for April 1, 2016, based on estimated runoff-year pumping for each well field (Table 1) and the estimated valley-wide runoff of 148,600 AF provided in the Plan.

Table 2 gives predicted changes in water table elevation at indicator wells and monitoring sites for the high and low range of pumping in the proposed Plan. In the Laws, Bishop, Big Pine, Thibaut-Sawmill, and Lone Pine well fields the maximum and minimum pumping scenarios are the same; hence, the predicted changes in water table elevation are the same two pumping scenarios for those well fields. Among the other well fields, the largest differences in pumping between the two pumping scenarios are in the Taboose-Aberdeen, Independence-Oak, and Symmes-Shepherd well fields. In the Taboose-Aberdeen well field, the difference in water table elevation between the high and low pumping amounts is up to 1.98 feet. In the Independence-Oak well field, the difference in water table elevation between the high and low pumping amounts is up to 2.24 feet. In the Symmes-Shepherd well field, the difference in water table elevation between the high and low pumping amounts is up to 2.03 feet. In the Big Pine well field, the difference in water table elevation between the high and low pumping amounts is up to 0.51 feet.

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 1. Estimated maximum and minimum pumping totals for runoff-year 2015 used in predictive 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	5,806	5,806
Bishop	10,352	10,352
Big Pine	22,909	20,209
Taboose-Aberdeen	10,543	4,483
Thibaut-Sawmill	8,305	8,305
Ind.-Oak	9,135	6,435
Symmes-Shep.	5,683	2,893
Bairs-George	1,670	1,310
Lone Pine	882	882
Sum	75,285	60,675

Table 2. Predicted water level changes at indicator wells and monitoring sites for LADWP's high and low range of pumping in the proposed plan for 2015. Negative DTW values denote a decline. Baseline is the average of April water levels in 1985-87.

Station ID, Monitoring site	**Predicted change in DTW: 75,285 ac-ft**	**Predicted change in DTW: 60,675 ac-ft**	**2016 predicted dev. from baseline:75,285 ac-ft**
	(ft)		(ft)
Laws			
107T	2.35	2.35	-9.82
436T	0.63	0.63	-4.93
438T	0.62	0.62	-5.96
490T	-0.21	-0.21	-4.64
492T	0.07	0.07	-3.66
795T, LW1	Dry	Dry	Dry
V001G, LW2	Dry	Dry	Dry
574T	0.81	0.81	-3.27
Big Pine			
425T	-1.43	-0.98	-8.56
426T	-0.95	-0.69	-6.57
469T	-0.16	0.11	-3.99
572T	-0.66	-0.15	-4.81
798T, BP1	0.28	0.71	-4.00
799T, BP2	-0.01	0.27	-4.11
567T, BP3	-1.71	-1.32	-9.37
800T, BP4	-1.05	-0.65	-7.77
Taboose Aberdeen			
417T	NA	NA	NA
418T	-1.04	-0.38	-2.91
419T, TA1	-2.35	-0.76	-4.79
421T	-2.31	-0.69	-6.51
502T	-0.79	-0.04	-5.64
504T	-2.73	-0.75	-4.95
505T	NA	NA	NA
803T, TA6	NA	NA	NA
586T, TA4	-1.43	-0.10	-3.57
801T, TA5	0.44	0.82	-0.40
Thibaut Sawmill			
415T	-1.31	-1.31	2.33
507T	0.68	0.68	0.32
806T, TS2	3.45	3.45	1.22

Station ID, Monitoring site	Predicted change in DTW: 75,285 ac-ft	Predicted change in DTW: 60,675 ac-ft	2016 predicted dev. from baseline:75,285 ac-ft
Ind. Oak			
406T	0.14	0.45	-4.16
407T	0.25	1.15	-8.10
408T	-0.05	0.57	-3.94
409T	0.23	2.47	-11.36
546T	-0.34	0.09	-7.75
809T, IO1	-2.60	-1.92	-12.50
Symmes Shepherd			
402T	-0.39	-0.07	-4.38
403T	-0.94	-0.07	-4.64
404T	0.16	0.49	-3.28
510T	0.22	0.54	-3.17
511T	0.20	0.54	-4.88
447T	-3.03	-1.00	-24.13
646T, SS2	Dry	Dry	Dry
V009G, SS1	-1.40	0.37	-20.58
Bairs George			
398T	-1.35	-0.34	-1.04
400T	0.19	0.38	-0.64