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COUNTY OF INYO
WATER DEPARTMENT

April 30, 2020

Mr. Clarence Martin, 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 2020-2021

Dear Mr. Martin,

In accordance with Section V.D. of the Inyo/Los Angeles Long Term Water Agreement, this letter transmits the Inyo County Water Department's (ICWD) comments on LADWP's Draft Owens Valley Operations Plan for Runoff Year 2020-2021 (Draft Plan). The Draft Plan indicates that the City intends to pump between 75,000 and 93,000 acre-feet (ac-ft) of groundwater during the 2020-2021 runoff year and that runoff is forecast to be 74% of normal. The lower range of proposed pumping is near the long-term average pumping under the Water Agreement (72,582 ac-ft, 1991-2019) but significantly greater than necessary for sole source uses (e.g. in-valley agriculture or mitigation). The proposed upper range of pumping in the Draft Plan is greater than actual pumping in any year since the Water Agreement was signed (1991-2018). We do not concur with the statement in the Draft Plan that the proposed groundwater pumping is more conservative than pumping plans developed during the dry years of the early-1990's (Draft Plan, p. 1-4). ICWD's recommended pumping amount, 71,545 ac-ft is a more prudent plan for the upcoming drought year which allows the multiple goals of the Water Agreement to be met with a more sustainable approach: a significant amount of groundwater would be pumped for use in Owens Valley and export to Los Angeles, while maintaining the shallow water level conditions that are compatible with groundwater dependent vegetation protected by the Water Agreement.

Background. Relatively low pumping and high runoff in 2019-2020 caused the water table to rise in most areas of the Owens Valley. Operations and conditions in 2019 were unusual in that runoff in the Owens Valley was approximately 80,000 ac-ft greater than expected and pumping was approximately 20,000 ac-ft less than the upper limit in the 2019-20 Operations Plan. As a result of high runoff and modest pumping, groundwater to rose 1-3 ft in most wellfields (Table 1). Water levels in April 2020 in many wellfields are near or above those measured in the mid-1980s when the baseline vegetation mapping was completed; however, declines due to the 2012-16 drought and pumping for local uses and export are still evident beneath groundwater-dependent vegetation in northern Taboose-Aberdeen, Independence-Oak, and Symmes-Shepherd wellfields. Water levels in these areas remain below that of the baseline period despite favorable runoff during the last three years that contributed to water table recovery elsewhere (Table 1).

In 2019, total perennial cover declined below baseline in just two wellfield parcels (BLK009 and LAW072), and four dropped below baseline perennial grass cover (FSL116, BLK009, BLK075, IND019). These changes are in addition to eight parcels that have been below baseline total perennial cover and 22 parcels that have been below baseline grass cover for three or more years despite favorable water levels and precipitation since 2017. Vegetation persistently below baseline suggests either an impact has occurred or additional time with favorable water levels is needed to recover. Summarizing 2019 vegetation monitoring results: 13 out of 97 wellfield parcels sampled had total perennial cover below baseline, and 30 out of 97 of wellfield parcels sampled had grass cover below baseline. In some wellfields, the proposed pumping in the Draft Plan could significantly lower water levels in areas of chronic vegetation declines or where water levels have not recovered from 2012-2016 conditions. ICWD's analysis of the proposed wellfield pumping near particular vegetation parcels that exhibit depressed perennial cover and/or grass cover are discussed in the wellfield sections below. We recognize that even with minimum pumping, water levels are predicted to decline in Laws, Big Pine, Bairs-George, and parts of Tabooose-Aberdeen and Independence-Oak wellfields this year.

As in previous years, Inyo County does not think it is justified to pump groundwater for export to Los Angeles near vegetation that is measurably and chronically below baseline levels. Adjusting pumping to maintain a shallow water table in some areas of groundwater-dependent vegetation in 2020-21 is necessary for recovery to baseline and to potentially avoid impacts during lengthy droughts in the future, like those experienced often during the past 35 years. Shallow groundwater levels are particularly important to maintain perennial grasses which have seen larger and more persistent declines than total cover and in a larger number of parcels.

General Comments: The Draft Plan includes testing of 386W near the Five-Bridges mitigation site. Mitigation measure 10-12 was adopted by LADWP in the 1991 FEIR to mitigate the impacts caused by the operation of wells W385 and W386 in the late 1980's (p. 10-58 of the 1990 DEIR, Sept. 1990). The adopted mitigation measure included discontinuation of pumping

from the two wells. In 2018 Inyo and Los Angeles settled litigation regarding test pumping W385. That settlement required the Technical Group to temporarily amend the 1999 Revegetation Plan to allow pumping from W385 and to adopt a Mitigation and Monitoring plan for the test. The settlement also prescribes several actions that must occur before testing of W386 can proceed including: 1) Technical Group agreement that testing W385 did not cause adverse effects, 2) Technical Group approval of monitoring and mitigation plan for a W386 test, and 3) Technical Group agreement to again temporarily suspend the 1999 Revegetation Plan provision that W385 and W386 remain "permanently shut down" to allow the test to be conducted. The Technical Group must assess the effects of W385 and comply with the requirements set forth in the 2018 settlement. The Water Department is concerned that the 1980's vegetation impact at Five-Bridges has not been fully mitigated, in particular the diminished perennial cover, conversion of shrub willow areas, and weed infestation. On February 21, 2019 the Technical Group adopted a work plan describing the revegetation activities, irrigation, land management, and monitoring of vegetation and hydrologic conditions in the Five Bridges mitigation area. Provisions of the work plan and pump test procedures recommended that favorable hydrologic conditions exist before conducting the pump test. Favorable hydrologic conditions were present at the beginning of the W385 test, and the Water Department would insist that similar conditions exist before the start of any test of W386.

Miscellaneous comments. Neither Table 1.7 in the Draft Plan nor Annual Report Chapter 2 – Conditions in the Owens Valley, specify the amount of water used for Owens Lake dust mitigation. To assist Inyo County's participation in the Owens Lake Groundwater Work Group, please include these data in the Draft Plan or elsewhere in the Annual Report.

We are pleased to note that despite the lower than normal expected runoff, Type E irrigation obligations will be met. We are concerned, however, over the persistent reduced delivery of stockwater compared with 1981-82 and the potential for adverse effects on lease operations and Type E vegetation.

Although the Water Agreement's process for Annual Operations Plans is based on planning for individual years, the Water Department recommends that the Technical Group consider multi-year planning to manage water table fluctuations within ranges to compatible with vegetation baseline conditions. Staff worked cooperatively on such proposals to revise the Green Book for several years, but while progress was made the methods were never agreed upon.

Evaluation of 2020 Operations Plan - methods. ICWD's analysis of the Draft Plan and pumping recommendations are based on the goals and principles of the Water Agreement, the status of individual pumping wells according to Green Book soil water triggers, groundwater dependent vegetation conditions monitored by the Technical Group, water table conditions in each well field, and groundwater uses within each wellfield.

Multiple linear regression models at 46 indicator wells are used to predict water table elevation in April 2021 as a function of wellfield pumping, 2020 water table elevation, and forecasted Owens Valley runoff. The Laws indicator well models rely on the sum of diversions into the Upper and Lower McNally canals at the Owens River as the variable related to recharge instead of Owens Valley runoff. Water spreading is not planned for Laws in 2020-21 (Table 2.5 of the Draft Plan). The set of indicator well models used by ICWD differs from the original set of indicator wells used by LADWP. The Technical Group in 2020 should update and evaluate the models and agree on a common set of the best models to use for future pumping plans and analyses.

Four pumping scenarios were evaluated and are presented in this letter; the proposed lower limit (minimum) and upper limit (maximum) for pumping in the Draft Plan, and ICWD's recommended pumping (Tables 2 and 3). The upper limit of the pumping proposed in the Draft Plan represents the maximum impact on the water table under the Draft Plan, and LADWP has historically pumped near the maximum proposed amount except for unusual circumstances. The analysis of water levels with minimum pumping for specific uses in the Owens Valley is included as a basis for comparison with the higher levels of pumping in the Draft Plan and the amount of pumping that ICWD recommends as compatible with the goals of the Water Agreement. In below normal runoff years, ICWD estimates minimum pumping for in-valley uses to be approximately 54,300 AF. We recognize the actual pumped amount deviates from this estimate depending on forecasted and actual runoff differences which affect the amount of surface water available to supply irrigation or mitigation projects instead of groundwater.

LADWP's proposed operations plan includes pumping for export from all wellfields except Bishop, Symmes-Shepherd, and Lone Pine wellfields. ICWD's recommended pumping corresponds with the Draft Plan in those wellfields. ICWD has concerns about pumping and water levels persisting below baseline in three wellfields following the 2012-16 drought: Independence-Oak, Symmes-Shepherd, and southern Thibaut-Sawmill (Table 1). The goal for these areas/wellfields should be to limit pumping to maintain water levels compatible with achieving the groundwater-dependent vegetation protections of the Water Agreement.

Wellfield-specific conditions. The following sections present a summary of conditions in each wellfield including: the predicted effects of the proposed pumping, ICWD's comments on LADWP's proposed operations, and ICWD's recommended pumping. In the sections below, baseline water levels refer to 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. Observed water level changes since April 2019 and deviations from baseline water levels based on ICWD field measurements are given in Table 1. Wellfield pumping proposed by LADWP in the Draft Plan and pumping recommended by ICWD are given in Table 2. Predicted water table changes are presented in Table 3.

Laws. The Draft Plan proposes between 7,580 and 10,460 ac-ft of pumping in the Laws wellfield to supply town water systems, irrigation, enhancement/mitigation (E/M) projects, and export. Last year, the water table rose between 0.7 and 5.0 feet in indicator wells, and water levels currently range from 0.8 feet to 8.7 feet above baseline. Vegetation parcels LAW035, LAW043, LAW052, LAW062, LAW070, LAW082, and LAW085 are geographically associated and have chronically below-baseline grass cover and perennial cover only infrequently recovers to baseline.

Water levels in Laws respond substantially to irrigation and water spreading that is diverted from the Owens River into the McNally canals. LADWP's Draft Plan suggests no diversion from the river is planned. The proposed upper pumping amount in Laws would cause water levels to decline several feet (Table 3). Given the chronically poor vegetation conditions in the parcels listed above despite water table recovery in 2019-20, water levels in this wellfield should be allowed to remain at or near baseline to monitor and assess if vegetation will recover to baseline. ICWD recommends pumping not exceed 7,580 ac-ft. Pumping at this amount will maintain water levels in indicator wells (434T, 436T, 490T, V001g, and 574T) within 1.5 ft of baseline. These indicator wells are located near the relatively high cover meadow parcels in the southern and eastern portion of the wellfield.

Despite repeated recovery of water levels to near or above baseline since 2000, the degraded conditions in parcels noted above persist. It is important that the Technical Group evaluate in 2020-21 whether a significant impact exists (Green Book Sec. I.C.) in these vegetation parcels in Laws.

Bishop. LADWP proposes to pump 11,040 to 12,685 ac-ft from the Bishop wellfield. It appears that the proposed pumping will be within the limits of the Hillside Decree. ICWD recommends pumping not exceed 12,685 ac-ft providing that it complies with the Hillside Decree and that uses/losses downstream of the wells exceed pumping.

Big Pine. LADWP proposes to pump between 21,000 and 23,695 ac-ft from the Big Pine wellfield. This amount apparently includes hatchery and town supply as well as several months of operation of exempt well(s) for export. One large vegetation parcel in the wellfield, BGP162, has had vegetation cover chronically below baseline. Two other parcels, BP154 and FSP006 have suffered a measurable grass decline. Last year the water table rose between 0.7 to 3.8 ft at indicator wells and monitoring sites in the wellfield. Water levels were between baseline and 4.4 ft above baseline in the wellfield. Last year, cover in BGP162 was not significantly below baseline for only the second such year since monitoring began in 1991.

The Draft Plan states that LADWP intends to decommission W341 and replace its pumping with adjacent W415 for the town water system needs. During 2019-20, Inyo and Los Angeles staff discussed test procedures for the initial period of operation of W415 pumping above the

exemption for town supply (W415 test). We also recognize that the Water Agreement, as amended by the 2002 Stipulation and Order #12908, committed LADWP to provide surface and groundwater for the Big Pine Irrigation and Improvement Association (BPIIA) ditch system from Big Pine Creek, W341 or W415, or a new well drilled in the Bell Canyon area.

Since November 2013, LADWP has addressed concerns raised by the Water Department on the monitoring and management of W415 including installation of additional monitoring wells, resolving questions regarding BPIIA use and loss calculations, and mapping vegetation near the 1872 fault. Results of the W415 test would be used to assess the adequacy of LADWP's groundwater model and determine if operation of W415 is sufficient to supply the BPIIA ditch system and thus preclude the need to install the Bell Canyon well. Ultimately, the information developed by the proposed test would assist the Technical Group design long term monitoring program for the operation of W415 to ensure the goals of the Water Agreement are met. We think that the Technical Group must approve the test procedures to substitute for Green Book On/Off provisions and to comply with the Water Agreement, Sec. VI before increasing pumping above town water supply needs.

If the proposed pump test of W415 is conducted in 2020, the overall pumping from Big Pine should not exceed the amount for the W415 test, town supply, BP Northeast Regreening Project, and the hatchery (approximately 21,500 ac-ft). Wells W218 and W219 should not be operated to prevent confounding the 415W test results and to safeguard water level increases and tenuous vegetation improvements in recent years.

Taboose-Aberdeen. LADWP proposes to pump between 16,920 and 19,500 ac-ft in the Taboose-Aberdeen wellfield. Alkali meadow parcels TIN050, TIN 053, TIN 064, and TIN 068 all have chronically lower grass cover than baseline despite water level recovery to baseline suggesting a Type C to B conversion may have occurred and the water table regime may be insufficient to recover vegetation to baseline. Last year, water table changes at all but one monitoring well increased up to 2.5 feet (one monitoring site declined 0.4 feet). Water levels in the central and southern portion of the wellfield are 0.8 to 3.7 feet above baseline; two indicator wells north of Aberdeen Station Road are 1.1 and 1.6 feet below baseline. All indicator wells decline in 2020-21 at the lower and upper limits of proposed pumping. Decreasing pumping to 9,500 ac-ft would stabilize water levels at baseline on average. Pumping from W349 should be limited to required amounts to avoid lowering water levels in the monitoring wells that are below baseline.

The Technical Group should evaluate in 2020-21 whether a significant change in Type C parcels exists in vegetation parcels with chronically depressed grass cover.

Thibaut-Sawmill. LADWP proposes to pump 8,000 to 11,160 in the Thibaut-Sawmill wellfield. Two parcels, IND026 and IND029 in the southern portion of this wellfield have

chronically depressed water levels and grass cover. Pumping should be managed to promote water table recovery under these parcels by not pumping W382. Cover in BLK094 has improved slightly but is not fully recovered in terms of perennial or grass cover. Last year, water table declined 0.4 ft. or increased up to 1.5 ft., but water levels remained at baseline or several feet above baseline (Table 1), largely due to reductions in pumping at the Blackrock hatchery in 2014. Water levels will remain above baseline at LADWP's proposed maximum pumping amount; however, ICWD recommends pumping not exceed 11,050 ac-ft and be managed to maintain and avoid lowering water levels under the parcels mentioned above.

The Technical Group should evaluate in 2020-21 whether a significant impact exists in vegetation parcels IND026 and 029.

Independence-Oak. LADWP proposes to pump between 6,420 and 10,740 ac-ft in the wellfield. Last year, water levels increased at all monitoring sites and indicator wells, but were still 1-5 ft below baseline. This wellfield was pumped for export in 2018 and water levels in the southern portion remain below baseline and did not recover despite greater than normal runoff. Pumping should be managed to stabilize water levels and limited to sole source uses at 6,420 ac-ft. Water levels in some wells decline even at that amount, and restricting pumping for irrigation and E/M projects would result in approximately 0.5 ft. decline in water levels on average (Table 3).

Symmes-Shepherd. LADWP proposes to pump 960 ac-ft from the Symmes-Shepherd wellfield for sole source irrigation supply. One parcel, IND139, exhibits chronically depressed grass cover. Last year, the water table varied between a decline of 0.7 ft to an increase of 3.9 ft, but despite the gradual water table recovery and conservative pumping in recent years, the water table level remains below baseline. ICWD concurs that pumping be limited to supply the Symmes-Shepherd E/M project, approximately 960 ac-ft.

Bairs-Georges. LADWP proposes to pump 2,100 to 2,820 ac-ft in the Bairs-Georges wellfield. Perennial and grass cover in the largest monitored parcel in the wellfield, MAN037 has rarely recovered to baseline. Cover in an adjacent parcel, MAN038, which has only infrequently been sampled, was also below baseline in 2019. Last year, water levels rose 0.8 to 2 ft. in indicator and vegetation monitoring site wells and all remain above baseline. Under LADWP's maximum proposed pumping, water levels would decline 0.9 to 4.4 ft and would be below baseline. Average water levels would remain at baseline if pumping is limited to the ICWD recommended amount of 1,050 ac-ft.

Lone Pine. LADWP proposes to pump 980 ac-ft from the Lone Pine well field for town and E/M project supply. Concerning operation of well W416, the Draft Plan notes that LADWP plans to equip and test this well and has requested that the Technical Group designate a monitoring site to manage this well. The management requirements of this well differ from

those of many of LADWP's aqueduct supply wells in that effects on non-LADWP wells are a much more substantial concern here than in wellfields where LADWP wells are located farther from potentially affected non-LADWP wells. The Water Department does not think the modifications to the well alleviate concerns that it may affect private wells. Before W416 can be operated, the Technical Group should adopt procedures to test the well under conditions that prevent impacts to vegetation and private wells. ICWD recommends pumping not exceed 980 ac-ft for the uses specified in the Draft Plan.

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,

Aaron Steinwand, Water Director

cc: Inyo County Board of Supervisors
Inyo County Water Commission
Clint Quilter, County CAO
Marshall Rudolph, County Counsel
Greg James, Special Counsel

Table 1. Depth to Water (DTW) at indicator wells, April 2020. All data are in feet. Negative values denote a decline in water level. Depths are from reference point on the test well. Baseline elevation at monitoring sites was predicted from monitoring site/indicator wells regression models unless the test well was present 1985-87.

Station ID, Monitoring site	DTW April 2020	Change from April 2019	Deviation from Baseline in 2020
Laws			
107T	23.50	4.65	0.77
434T	6.07	0.74	1.53
436T	5.98	1.53	2.12
438T	7.20	3.15	2.40
490T	8.87	1.93	4.20
492T	24.07	4.65	8.73
795T, LW1	8.15	1.41	5.14
V001G, LW2	13.94	4.98	5.68
574T, LW3†	10.73	1.27	2.35
Big Pine			
425T	13.90	3.37	1.00
426T	11.54	1.89	0.03
469T	21.19	0.87	0.48
572T	8.23	3.16	3.67
798T, BP1	11.70	2.94	4.35
799T, BP2	18.44	0.67	0.07
567T, BP3	12.32	3.78	1.64
800T, BP4	12.98	2.63	0.61
Taboose Aberdeen			
417T	23.46	2.42	3.51
418T	7.46	0.22	0.77
419T, TA1	4.11	0.76	2.52
421T	33.26	2.00	1.09
502T	9.05	0.98	-1.56
504T	8.23	0.79	2.54
505T	15.20	2.52	3.40
586T, TA4	6.4	0.22	1.92
801T, TA5	14.66	-0.41	-1.14
803T, TA6	4.99	2.41	3.71

Station ID, Monitoring site	DTW	Change from April 2019	Deviation from Baseline in 2020
Thibaut Sawmill			
415T	9.35	1.47	9.15
507T	3.87	-0.39	0.80
806T, TS2	9.52	-0.41	3.66
Independence Oak			
406T	3.56	1.93	-1.99
407T	11.69	0.89	-4.39
408T	4.00	1.47	-0.87
409T	6.55	3.88	-4.95
546T	4.75	0.50	-1.32
809T, IO1	9.35	2.86	-2.78
Symmes Shepherd			
402T	10.11	0.02	-2.08
403T	7.06	0.63	-1.73
404T	5.88	-0.10	-2.31
447T	35.34	3.92	-13.47
510T	7.08	-0.65	-2.08
511T	7.55	-0.44	-2.92
V009G, SS1	17.95	2.98	-11.12
Bairs George			
398T	3.96	0.86	2.39
400T	5.57	0.75	0.73
812T, BG2	8.85	1.95	0.74

Table 2. Pumping totals by wellfield evaluated using the regression models. Regression modeling is not completed for Bishop because pumping in that wellfield must comply with the Hillside decree and for Lone Pine because the proposed pumping is for mitigation and town supply only.

Wellfield	**LADWP Low (75,000 AF)**	**LADWP High (93,000 AF)**	**In-Valley Min (54,300 AF)**	**ICWD Recommended (71,045 AF)**
	Ac-ft/year	Ac-ft/year	Ac-ft/year	Ac-ft/year
Laws	7,580	10,460	6,000	7,580
Bishop	11,040	12,685	10,390	12,685
Big Pine	21,000	23,695	21,000	21,500
Taboose-Aberdeen	16,920	19,500	300	9,500
Thibaut-Sawmill	8,000	11,160	8,000	11,050
Independence-Oak	6,420	10,740	6,420	6,240
Symmes-Shepherd	960	960	960	960
Bairs-George	2,100	2,820	250	1,050
Lone Pine	980	980	980	980
Sum	75,000	93,000	54,300	71,545

Table 3. Predicted water level changes at indicator wells and monitoring sites for LADWP's proposed annual operations plan for 2020. Negative DTW values denote a decline.

Station ID, Monitoring site	LADWP Low 75,000 ac-ft 2021 vs 2020	LADWP Low 75,000 ac-ft 2021 vs Baseline	In Valley MIN 54,300 ac-ft 2021 vs 2020	In Valley MIN 54,300 ac-ft 2021 vs Baseline
	(DTW change ft)	(DTW change ft)	(DTW change ft)	(DTW change ft)
Laws				
107T	-4.92	-4.15	-4.39	-3.62
434T	-1.25	0.28	-1.02	0.51
436T	-3.02	-0.90	-2.79	-0.67
438T	-4.24	-1.84	-4.05	-1.65
490T	-2.45	1.75	-2.35	1.84
492T	-6.32	2.41	-5.47	3.26
795T	-11.05	-5.91	-10.30	-5.16
V001g	-6.18	-0.50	-5.75	-0.07
574T	-3.82	-1.46	-3.58	-1.23
Big Pine				
425T	-1.17	-0.17	-1.17	-0.17
426T	-0.72	-0.69	-0.72	-0.69
469T	-0.85	-0.38	-0.85	-0.38
572T	-2.79	0.88	-2.79	0.88
798T, BP1	-3.57	0.77	-3.57	0.77
799T, BP2	-0.43	-0.36	-0.43	-0.36
567T, BP3	-1.69	-0.05	-1.69	-0.04
800T, BP4	-0.79	-0.18	-0.79	-0.18
Taboose Aberdeen				
417T	-4.43	-0.92	-0.07	3.43
418T	-1.42	-0.64	0.46	1.24
419T, TA1	-3.97	-1.45	0.51	3.04
421T	-4.28	-3.19	0.26	1.35
502T	-2.00	-3.56	0.08	-1.48
504T	-4.87	-2.33	0.69	3.23
505T	-4.36	-0.96	0.08	3.48
586T, TA4	-2.95	-1.02	0.76	2.69
801T, TA5	-0.62	-1.75	0.41	-0.73
803T, TA6	-4.58	-0.87	-0.46	3.25
Thibaut Sawmill				
415T	0.10	9.25	0.10	9.25
507T	0.36	1.15	0.36	1.15
806T, TS2	0.12	3.78	0.12	3.78
Independence- Oak				
406T	-0.32	-2.31	-0.32	-2.31
407T	0.26	-4.13	0.26	-4.13
408T	0.05	-0.81	0.05	-0.81
409T	-0.54	-5.49	-0.54	-5.49
546T	-1.71	-3.03	-1.71	-3.03
809T, IO1	-0.92	-3.70	-0.92	-3.70
Symmes Shepherd				
402T	0.03	-2.05	0.03	-2.05
403T	0.52	-1.21	0.52	-1.21
404T	0.46	-1.86	0.46	-1.86
447T	0.64	-12.83	0.64	-12.83
510T	0.43	-1.65	0.43	-1.65
511T	0.42	-2.49	0.42	-2.49
V009G, SS1	0.71	-10.42	0.71	-10.42
Bairs George				
398T	-2.70	-0.31	-0.19	2.20
400T	-0.69	0.04	-0.22	0.51
812T	-3.56	-2.82	-1.37	-0.63

Table 3. [continued]

Station ID, Monitoring site	LADWP High 93,000 ac-ft 2021 vs 2020	LADWP High 93,000 ac-ft 2021 vs Baseline	ICWD Recommended 71,725 ac-ft 2021 vs 2020	ICWD Recommended 71,725 ac-ft 2021 vs Baseline
	(DTW change ft)	(DTW change ft)	(DTW change ft)	(DTW change ft)
Laws				
107T	-5.88	-5.11	-4.92	-4.15
434T	-1.65	-0.12	-1.25	0.28
436T	-3.44	-1.32	-3.02	-0.90
438T	-4.59	-2.19	-4.24	-1.84
490T	-2.63	1.57	-2.45	1.75
492T	-7.86	0.87	-6.32	2.41
795T	-12.42	-7.28	-11.05	-5.91
V001g	-6.98	-1.30	-6.18	-0.50
574T	-4.25	-1.90	-3.82	-1.46
Big Pine				
425T	-1.63	-0.63	-1.25	-0.25
426T	-0.98	-0.95	-0.77	-0.74
469T	-1.10	-0.62	-0.90	-0.42
572T	-3.29	0.38	-2.89	0.78
798T, BP1	-4.01	0.33	-3.66	0.69
799T, BP2	-0.67	-0.60	-0.47	-0.40
567T, BP3	-2.10	-0.46	-1.77	-0.12
800T, BP4	-1.35	-0.74	-0.90	-0.29
Taboose Aberdeen				
417T	-5.10	-1.60	-2.48	1.02
418T	-1.71	-0.94	-0.58	0.20
419T, TA1	-4.66	-2.14	-1.97	0.56
421T	-4.99	-3.89	-2.25	-1.16
502T	-2.32	-3.88	-1.07	-2.63
504T	-5.73	-3.19	-2.38	0.15
505T	-5.05	-1.65	-2.38	1.02
586T, TA4	-3.52	-1.60	-1.29	0.63
801T, TA5	-0.78	-1.91	-0.16	-1.30
803T, TA6	-5.22	-1.51	-2.74	0.97
Thibaut Sawmill				
415T	-2.34	6.81	-2.26	6.89
507T	-0.16	0.64	-0.14	0.65
806T, TS2	-0.50	3.16	-0.48	3.18
Independence- Oak				
406T	-0.62	-2.62	-0.32	-2.31
407T	-1.21	-5.60	0.26	-4.13
408T	-0.92	-1.79	0.05	-0.81
409T	-3.55	-8.50	-0.54	-5.49
546T	-2.35	-3.66	-1.71	-3.03
809T, IO1	-2.41	-5.20	-0.92	-3.70
Symmes Shep.				
402T	0.03	-2.05	0.03	-2.05
403T	0.52	-1.21	0.52	-1.21
404T	0.46	-1.86	0.46	-1.86
447T	0.64	-12.83	0.64	-12.83
510T	0.43	-1.65	0.43	-1.65
511T	0.42	-2.49	0.42	-2.49
V009G, SS1	0.71	-10.42	0.71	-10.42
Bairs George				
398T	-3.68	-1.29	-1.28	1.11
400T	-0.87	-0.14	-0.42	0.31
812T	-4.41	-3.67	-2.32	-1.58