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COUNTY OF INYO
WATER DEPARTMENT

April 30, 2021

Mr. Adam Perez, 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 2021-2022

Dear Mr. Perez,

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 2021-2022 (Draft Plan). The Draft Plan indicates that the City intends to pump between 64,600 and 78,980 acre-feet (ac-ft) of groundwater during the 2021-2022 runoff year, and that runoff is forecast to be 55% of normal. Approximately 10,000 ac-ft of the potential high range of pumping is planned for the October-March period, presumably for aqueduct supply. The lower range of proposed pumping is less than long-term average pumping under the Water Agreement (73,645 ac-ft, 1991-2020) but significantly greater than necessary for sole source uses (e.g. in-valley agriculture or mitigation). The expected low runoff this year and low precipitation of this past winter will present challenges to meeting Water Agreement goals. These conditions stress native vegetation, and our analysis suggests water levels are expected to decline in wellfields even at minimum pumping for uses in the valley. ICWD's recommended pumping amount, 59,377 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 stabilizing shallow water level conditions that are compatible with groundwater dependent vegetation protected by the Water Agreement.

Background

Relatively low runoff and approximately 73,000 ac-ft of pumping in 2020-2021 caused the water table to decline in most areas of the Owens Valley (Table 1). Operations and conditions in 2020 were unusual in that pumping in Big Pine was curtailed due to closure of the Fish Springs hatchery. Big Pine was the only wellfield in which water levels in multiple indicator wells rose in 2020-21. April 2021 water levels in two thirds of the indicator wells are now below those measured in the mid-1980s when the baseline vegetation mapping was completed, primarily in Laws, Taboose-Aberdeen, Independence-Oak, and Symmes-Shepherd wellfields. Water levels in Independence-Oak and Symmes-Shepherd have not recovered from the pumping early in the 2012-2016 drought despite favorable runoff during in 2016-2019 (Table 1).

As in previous years, Inyo County does not think it is justified to pump groundwater for aqueduct supply 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 2021-22 is necessary to stabilize declines since the onset of the present drought and to potentially avoid impacts should the drought resemble recent lengthy droughts 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. In addition to the requirements necessary to comply with the 2018 settlement, we are aware that hydrologists from California Department of Fish and Wildlife are in the process of evaluating and reporting on the results of the 385W test. The Technical Group should review that report before proceeding with a test of 386W. Also, the monitoring and mitigation plan for the 385W test included a provision that hydrological conditions should be favorable before commencing pumping. 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 to protect sensitive resources and to clearly discriminate the effects of pumping from drought. It does not appear that condition will be met given the extremely low runoff forecast. The County 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.

Miscellaneous comments

Neither the Draft Operations Plan nor Table 2.7 in the Draft Annual Report Chapter 2 – Conditions in the Owens Valley specify the amount of water used for Owens Lake dust mitigation separate from other uses. 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, attempts will be made to meet Type E irrigation and other in-valley use obligations. We recognize that the planned irrigation and stockwater values are less than 1981-82 amounts but understand these reduced amounts are due to anticipated low creek flows in late summer due to the drought. Additional information regarding area runoff should be provided to inform the County how these final in-valley use values were estimated. We remain 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 and lessee operations.

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 compatible with vegetation baseline conditions. Staff worked cooperatively on such proposals to revise the Green Book for several years, but while progress was made final 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 soilwater 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 2022 as a function of wellfield pumping, 2021 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 2021-22 (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, but the ranges of predicted changes generally agree with the predictions in Table 1.7. The Technical Group in 2021should 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; minimum pumping for

uses in the valley, LADWP's proposed lower limit (minimum) and upper limit (maximum) for pumping in the Draft Plan, and reduced pumping (Tables 2 and 3). The upper limit of the pumping proposed in the Draft Plan represents the maximum impact on the water table, and LADWP has historically pumped near the maximum proposed amount except for unusual circumstances (like in 2020 in Big Pine). 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 analysis suggests is compatible with the goals of the Water Agreement. In below normal runoff years, ICWD estimates minimum pumping for in-valley uses to be approximately 54,445 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, Lone Pine, and at the lower range of proposed pumping only, Thibaut-Sawmill and Symmes-Shepherd wellfields. ICWD's reduced pumping corresponds with the lower range of the pumping in 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). Thibaut-Sawmill and Independence-Oak were pumped for aqueduct supply in 2020 causing water levels to decline. In 2020-21, 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 2020 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 8,900 and 9,400 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 declined between 0.9 and 7.4 feet in indicator wells. The greatest declines were in the vicinity of the McNally Ponds project. Water levels currently range from 4.0 feet below to 3.8 feet above baseline. Vegetation parcels LAW035, LAW043, LAW052, LAW062, LAW070, LAW072 and LAW085 are all in the same general vicinity and have chronically below-baseline grass cover, and perennial cover that only infrequently recover

to baseline conditions.

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). Water levels are predicted to decline even at pumping for in-valley uses in Laws. Given the chronically poor vegetation conditions in the parcels listed above despite water table recovery in 2019-20, pumping should be limited to uses in Laws. Pumping at this amount will maintain water levels in indicator wells (434T, 436T, 490T, V001g, and 574T) located near the relatively high cover meadow parcels in the southern and eastern portion within 2.6 ft of baseline. Following the 2012-16 drought, some perennial vegetation and grass recovery was observed, likely in response to shallower water levels caused by water spreading in 2017-19. Minimizing water level declines and water levels greater than 6 ft below ground surface (the nominal grass rooting zone) should continue to allow for maintenance of perennial vegetation and grass conditions.

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 2021-22 whether a significant impact exists (Green Book Sec. I.C.) in these vegetation parcels in Laws.

Bishop. LADWP proposes to pump 12,000 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 12,000 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 20,500 and 23,000 ac-ft from the Big Pine wellfield. The upper amount 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, perennial vegetation cover in BGP162 was significantly below baseline again. The water table changes varied between +0.45 ft to -2.94 ft at indicator wells and monitoring sites in the wellfield. Water levels vary between 4 ft above to 0.8 ft below baseline at indicator wells but, due to the reduction in hatchery pumping, the average water level in the shallow-aquifer indicator wells remained above baseline (0.9 ft) for the second consecutive year.

The Draft Plan states that LADWP intends to decommission W341 and replace its pumping with adjacent W415 for the town water system needs. In 2020 the Inyo/Los Angeles Technical Group approved test procedures for the initial period of operation of W415 pumping above the exemption for town supply (W415 test) consistent with GreenBook Section VI. The test has not commenced but the monitoring program is in place. Staff should continue the water level and vegetation monitoring in 2021. We also recognize that the Water Agreement, as amended in

2002, committed LADWP to provide surface and groundwater for the Big Pine Irrigation and Improvement Association (BPIIA) ditch system from Big Pine Creek. In an exchange of letters in 2020, Inyo and Los Angeles concurred that water exiting the Big Pine Community Service District into Big Pine Creek would be considered pumped make-up water for the BPIIA. That accounting practice should continue.

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 19,225 ac-ft, approximate required use). 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.

In late 2020, conversations with California Department of Fish and Wildlife, staff mentioned that the Fish Springs hatchery may not require the full capacity of W330 and W332 at certain times of the year. Over the past several months, CDFW staff have analyzed their operations and water requirements. The flow required by the hatchery operations in any month cannot be supplied with a single well, but there are certain months in the fall or winter where pumping capacity of both wells is not necessary to meet present hatchery fish production goals. Those wells are exempt for hatchery use, and the Technical Group should revisit the exemptions and cooperate with CDFW to design water delivery infrastructure or pumps with varying capacity and potentially reduce the constant pumping stress on the Big Pine Wellfield.

Taboose-Aberdeen. LADWP proposes to pump between 5,300 and 8,880 ac-ft in the Taboose-Aberdeen wellfield. Alkali meadow parcels TIN050, TIN053, TIN064, and TIN068 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 declined in all indicator wells in this wellfield from 1.2-5.2 ft and now are below baseline. All indicator wells declined in 2020-21 at the lower and upper limits of proposed pumping. Decreasing pumping to 4,000 ac-ft would stabilize water levels during the upcoming year on average. Pumping from W118 and W349 should be limited to avoid lowering water levels under the parcels in the northern portion of the wellfield exhibiting grass declines.

The Technical Group should evaluate in 2021-22 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 11,000 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 is not fully recovered in terms of perennial or grass cover. Last year, the water table declined 0.8-3.0 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 8,432 ac-ft for the hatchery and possible late summer irrigation pumping from W155 if creek flow is insufficient. Pumping should be managed to maintain water levels under the parcels mentioned above.

The Technical Group should evaluate in 2021-22 whether a significant impact exists in vegetation parcels IND026 and 029.

Independence-Oak. LADWP proposes to pump between 7,000 and 8,800 ac-ft in the wellfield. Last year, water levels decreased at all monitoring sites and indicator wells, and were 2-6 ft below baseline. This wellfield was pumped for export again in 2020 and water levels in the southern portion remain below baseline and have not recovered since 2018. Pumping should be limited to sole source uses at 6,420 ac- ft. Water levels in some wells decline even at that amount, and restricting pumping to irrigation and E/M projects would result in approximately 0.54 ft. decline in water levels on average (Table 3).

Symmes-Shepherd. LADWP proposes to pump 1,200-2,900 ac-ft from the Symmes-Shepherd wellfield for sole source irrigation supply and export. One parcel, IND139, exhibits chronically depressed grass cover. Last year, the water table changes varied between +0.4--0.7 ft;, but despite the gradual water table recovery and conservative pumping in recent years, the water table level remains below baseline. ICWD recommends that pumping be limited to approximately 1,800 ac-ft to stabilize water levels.

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 have been not statistically below baseline in three out of the previous four years but has yet to attain or exceed baseline. The increased vegetation cover has corresponded with water levels recovery to baseline. Cover in an adjacent parcel, MAN038, which has only infrequently been sampled, was also below baseline in 2020. Last year, water levels declined 0.8 to 3.4 ft. in indicator and vegetation monitoring site wells and two remain at or above baseline. Under LADWP's maximum proposed pumping, water levels would decline 1.5 to 2.5 ft and would be below baseline in all wells. ICWD acknowledges the possible need to supplement irrigation/stockwater flows from Georges Creek with pumped water in this low-runoff year, and 600 ac-ft of pumping can accomplish this need and maintain water levels in 2022.

Lone Pine. LADWP proposes to pump 900 ac-ft from the Lone Pine wellfield 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 other wellfields. 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 2021	Change from April 2020	Deviation from Baseline in 2021
Laws			
107T	27.37	-3.87	-3.10
434T	6.98	-0.91	0.62
436T	8.09	-2.11	0.01
438T	13.63	-6.43	-4.03
490T	13.75	-4.88	-0.68
492T	29.02	-4.95	3.78
795T, LW1	15.56	-7.41	-2.27
V001G, LW2	18.48	-4.54	1.14
574T, LW3†	14.45	-3.72	-1.37
Big Pine			
425T	13.57	0.33	1.33
426T	11.90	-0.36	-0.33
469T	22.09	-0.90	-0.42
572T	7.78	0.45	4.12
798T, BP1	14.64	-2.94	1.41
799T, BP2	19.31	-0.87	-0.80
567T, BP3	13.06	-0.74	0.90
800T, BP4	12.49	0.49	1.10
Taboose Aberdeen			
417T	28.61	-5.15	-1.64
418T	8.69	-1.23	-0.46
419T, TA1	7.01	-2.90	-0.38
421T	36.84	-3.58	-2.49
502T	11.34	-2.29	-3.85
504T	11.02	-2.79	-0.25
505T	20.41	-5.21	-1.81
586T, TA4	8.39	-1.99	-0.07
801T, TA5	16.11	-1.45	-2.59
803T, TA6	9.86	-4.87	-1.16

Station ID, Monitoring site	DTW April 2021	Change from April 2020	Deviation from Baseline in 2021
Thibaut Sawmill			
415T	12.35	-3.00	6.15
507T	4.62	-0.75	0.05
806T, TS2	10.39	-0.87	2.79
Independence Oak			
406T	4.03	-0.47	-2.46
407T	12.05	-0.36	-4.75
408T	5.60	-1.60	-2.47
409T	7.38	-0.83	-5.78
546T	6.27	-1.52	-2.84
809T, IO1	10.99	-1.64	-4.42
Symmes Shepherd			
402T	10.80	-0.69	-2.77
403T	7.11	-0.05	-1.78
404T	6.39	-0.51	-2.82
447T	35.42	-0.08	-13.55
510T	7.62	-0.54	-2.62
511T	7.89	-0.34	-3.26
V009G, SS1	17.49	0.46	-10.66
Bairs George			
398T	5.98	-2.02	0.37
400T	6.38	-0.81	-0.08
812T, BG2	16.16	-3.44	-2.70

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 Min (64,600 AF)**	**LADWP Max (78,980 AF)**	**In-Valley Min (54,445 AF)**	**ICWD Reduced (59,377 AF)**
	Ac-ft/year	Ac-ft/year	Ac-ft/year	Ac-ft/year
Laws	8,900	9,400	6,000	6,000
Bishop	12,000	12,000	12,000	12,000
Big Pine	20,500	23,000	19,225	19,225
Taboose-Aberdeen	5,300	8,880	300	4,000
Thibaut-Sawmill	8,000	11,000	8,000	8,432
Independence-Oak	7,000	8,800	6,420	6,420
Symmes-Shepherd	1,200	2,900	1,200	1,800
Bairs-George	800	2,100	400	600
Lone Pine	900	900	900	900

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 64,600 ac-ft 2022 vs 2021	LADWP Low 64,600 ac-ft 2022 vs Baseline	In Valley MIN 54,445 ac-ft 2022 vs 2021	In Valley MIN 54,445 ac-ft 2022 vs Baseline
	(DTW change ft)	(DTW change ft)	(DTW change ft)	(DTW change ft)
Laws				
107T	-3.55	-6.65	-2.59	-5.69
434T	-1.12	-0.50	-0.70	-0.08
436T	-2.33	-2.32	-1.91	-1.90
438T	-1.15	-5.18	-0.80	-4.83
490T	-1.40	-2.08	-1.21	-1.90
492T	-4.87	-1.09	-3.32	0.46
795T	-7.21	-9.48	-5.83	-8.10
V001g	-4.35	-3.21	-3.55	-2.41
574T	-1.64	-3.00	-1.20	-2.57
Big Pine				
425T	-1.74	-0.41	-1.52	-0.19
426T	-1.03	-1.36	-0.90	-1.24
469T	-0.85	-1.27	-0.73	-1.15
572T	-3.70	0.42	-3.46	0.66
798T, BP1	-1.03	0.37	-0.82	0.58
799T, BP2	-0.42	-1.22	-0.30	-1.10
567T, BP3	-2.12	-1.22	-1.93	-1.02
800T, BP4	-1.18	-0.08	-0.92	0.19
Taboose Aberdeen				
417T	-0.50	-2.15	0.80	-0.84
418T	-0.14	-0.60	0.43	-0.03
419T, TA1	-0.47	-0.85	0.88	0.50
421T	-0.51	-3.00	0.85	-1.63
502T	-0.07	-3.92	0.55	-3.29
504T	-0.52	-0.77	1.16	0.90
505T	-0.42	-2.23	0.92	-0.89
586T, TA4	-0.13	-0.20	0.98	0.92
801T, TA5	-0.66	-1.93	0.96	-1.62
803T, TA6	-0.87	-2.03	0.37	-0.79
Thibaut Sawmill				
415T	0.41	6.56	0.41	6.56
507T	0.55	0.59	0.55	0.59
806T, TS2	-0.18	2.61	-0.18	2.61
Independence- Oak				
406T	-0.43	-2.89	-0.39	-2.85
407T	0.14	-4.61	0.34	-4.41
408T	0.19	-2.27	0.33	-2.14
409T	-1.24	-7.02	-0.84	-6.62
546T	-1.63	-4.47	-1.55	-4.38
809T, IO1	-1.32	-5.74	-1.11	-5.54
Symmes Shepherd				
402T	0.03	-2.74	0.03	-2.74
403T	0.28	-1.50	0.28	-1.50
404T	0.53	-2.29	0.53	-2.29
447T	-0.44	-14.00	-0.44	-14.00
510T	0.54	-2.08	0.54	-2.08
511T	0.45	-2.81	0.45	-2.81
V009G, SS1	-0.05	-10.71	-0.05	-10.71
Bairs George				
398T	0.28	0.65	0.83	1.20
400T	0.05	-0.03	0.15	0.07
812T	-0.96	-3.65	-0.48	-3.18

Table 3. [continued]

Station ID, Monitoring site	LADWP High 78,980 ac-ft 2022 vs 2021	LADWP High 78,980 ac-ft 2022 vs Baseline	ICWD Recommended 59,377 ac-ft 2022 vs 2021	ICWD Recommended 59,377 ac-ft 2022 vs Baseline
	(DTW change ft)	(DTW change ft)	(DTW change ft)	(DTW change ft)
Laws				
107T	-3.72	-6.82	-2.59	-5.69
434T	-1.19	-0.57	-0.70	-0.08
436T	-2.40	-2.39	-1.91	-1.90
438T	-1.21	-5.24	-0.80	-4.83
490T	-1.43	-2.11	-1.21	-1.90
492T	-5.14	-1.36	-3.32	0.46
795T	-7.44	-9.72	-5.83	-8.10
V001g	-4.49	-3.35	-3.55	-2.41
574T	-1.71	-3.08	-1.20	-2.57
Big Pine				
425T	-2.16	-0.83	-1.52	-0.19
426T	-1.27	-1.60	-0.90	-1.24
469T	-1.08	-1.50	-0.73	-1.15
572T	-4.16	-0.04	-3.46	0.66
798T, BP1	-1.44	-0.03	-0.82	0.58
799T, BP2	-0.64	-1.44	-0.30	-1.10
567T, BP3	-2.51	-1.60	-1.93	-1.02
800T, BP4	-1.69	-0.59	-0.92	0.19
Taboose Aberdeen				
417T	-1.44	-3.09	-0.16	-1.81
418T	-0.54	-1.00	0.01	-0.45
419T, TA1	-1.44	-1.81	-0.12	-0.50
421T	-1.49	-3.98	-0.16	-2.64
502T	-0.52	-4.37	0.09	-3.76
504T	-1.71	-1.97	-0.08	-0.33
505T	-1.38	-3.19	-0.07	-1.88
586T, TA4	-0.93	-1.00	0.16	0.09
801T, TA5	0.43	-2.15	0.74	-1.85
803T, TA6	-1.76	-2.92	-0.55	-1.71
Thibaut Sawmill				
415T	-1.91	4.24	0.07	6.22
507T	0.05	0.10	0.48	0.52
806T, TS2	-0.77	2.02	-0.27	2.53
Independence- Oak				
406T	-0.56	-3.02	-0.39	-2.85
407T	-0.47	-5.22	0.34	-4.41
408T	-0.21	-2.68	0.33	-2.14
409T	-2.50	-8.28	-0.84	-6.62
546T	-1.90	-4.74	-1.55	-4.38
809T, IO1	-1.94	-6.36	-1.11	-5.54
Symmes Shep.				
402T	-0.16	-2.94	-0.04	-2.81
403T	-0.25	-2.03	0.09	-1.69
404T	0.34	-2.49	0.46	-2.36
447T	-1.68	-15.23	-0.88	-14.43
510T	0.35	-2.27	0.47	-2.15
511T	0.25	-3.01	0.38	-2.88
V009G, SS1	-0.15	-11.81	-0.44	-11.10
Bairs George				
398T	-1.48	-1.11	0.55	0.92
400T	-0.28	-0.36	0.10	0.02
812T	-2.49	-5.16	-0.72	-3.42