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COUNTY OF INYO
WATER DEPARTMENT

April 30, 2024

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 2024-2025

Dear Mr. Perez:

In accordance with Section V.D. of the Inyo/Los Angeles Long Term Water Agreement, the following are the Inyo County Water Department's (ICWD) comments on LADWP's Draft Owens Valley Operations Plan for Runoff Year 2024-2025 (Draft Plan).

General comments and recommendations

ICWD is pleased that the 2023-24 pumping was lower (35,220 acre-feet) than the predicted minimum from last year's Operations Plan. Together with high runoff, this low pumping helped to recover water tables to above baseline in many (but not all) parts of the Owens Valley. The County encourages LADWP to continue to make use of the additional surface water remaining in the basin to minimize groundwater pumping for export and continue water table recovery. Furthermore, water table recovery realized last year and projected to continue this year should be used to prepare for below-average water years when there will be more stress on the groundwater system and on the vegetation it supports.

The Draft Plan indicates that 51,470 – 77,413 acre-feet (AF) of groundwater will be pumped during the 2024-2025 runoff year and that runoff is forecast to be 103% of normal. The 2023-24 Eastern Sierra winter snowpack accumulation was uncommonly average while precipitation on the valley floor was above average at 159% of normal. This comes on the heels of the

historically wet 2023-24 runoff year, when water tables rose and vegetation cover, including both shrub and grass, increased over the previous two years. Yet these wet conditions do not immediately reverse plant composition changes that have been stable for several decades. The Water Department would like to work with LADWP to find solutions to reverse or mitigate for past impacts and to avoid any future changes to vegetation composition contrary to the Agreement.

The County recommends pumping at the low end of the proposed range (51,470 AF). This water should be used only for in-valley uses and not for aqueduct supply. Because of the runoff forecast (419,300 AF) for this nearly average runoff season, there will be ample surface water available for both export and in-valley use, making minimal groundwater pumping feasible.

LADWP and the County cooperatively monitor both control and wellfield vegetation parcels each year. This program has consistently documented several parcels that underwent a perennial grass to woody transition early in the monitoring program, which is prohibited under the Agreement. The County would like Technical Group to focus on implementing solutions, such as managing the groundwater regime in a manner compatible with baseline vegetation Agreement goals, exploring woody vegetation treatment if water levels are high enough to support the herbaceous component, and grouping parcels found to need similar management together so that solutions may be implemented widely and expediently.

The County notes concerns with using pumped groundwater for enhancement/mitigation (E/M) projects and encourages LADWP to utilize surface water for these purposes whenever possible, understanding that not all projects can be supplied with surface water. The enormous amount of infrastructure constructed during 2023 for the high runoff could be used to spread surface water in wellfields (such as Independence-Oak and Symmes-Shepherd) that need water table recovery. The County suggests that the Technical Group discuss ways to use this infrastructure for the benefit of the valley.

The Draft Operations Plan references several replacement wells that will be tested and/or placed into operation in 2024-25. Including the more recent proposals for replacements for W247 and W379, it is the County's understanding that LADWP intends to move towards pumping from deep aquifers to minimize impacts to vegetation. While the County agrees with this strategy vis a vis vegetation, it is important to note that there may be impacts to other resources that are more difficult to discern in both time and space. LADWP and the County have agreed to propose a cooperative study to examine these potential impacts, and this study should be a priority for the upcoming year as several deep well proposals are currently on the table.

There are two typos in the Draft Plan that should be fixed. Section 1.2.2 notes that LADWP plans to equip W428 in the Bishop Wellfield; this should read W429. Similarly, Section 1.2.6 shows W398 as being linked to vegetation monitoring site IO1. This should be W391.

2023-2024 Groundwater Conditions in Indicator Wells

LADWP preliminary reported pumping for 2023-24 runoff year (ROY) was 35,220 AF. Over this same period, Owens Valley rain gauges[1] measured average ROY precipitation as 8.93 inches (159% of normal to-date on April 1, 2024, as noted above). This combination of much lower-than-average pumping, above average valley floor precipitation, and much greater-than-average 2023-24 runoff contributed to spring 2024 average groundwater level increases (i.e., recovery) in each of the seven analyzed wellfields[2] compared to spring 2023.

Table 1 is a summary of groundwater level changes by wellfield observed in spring 2024 compared to 2023 and baseline (i.e., average 1985, 1986, and 1987) levels in the 46 indicator wells that are intended to represent the shallow (water table) aquifer system. Appendix A includes these data tabulated by well. The indicator wells are a subset of the over 500 wells across Owens Valley Basin that were manually measured with an electric sounding tape for depth to water (DTW) by ICWD staff from mid-March through mid-April 2024.

Across the 46 indicator wells, water levels decreased (i.e., deepened) in seven (7) wells and increased in 39 wells from spring 2023 to 2024. Across all wellfields, water levels increased by an average of +3.3 feet (ft) and were, on average, +3.6 ft above baseline levels. Given spring 2023 water levels and LADWP minimum proposed pumping, spring 2024 water levels were predicted to increase +3.2 ft. As noted above, the actual observed spring 2024 water level increases are due to a combination of favorable groundwater recharge factors including a large volume of surface water spreading in the valley.

As of April 2024, water levels at indicator wells were above baseline average depths in Laws, BP, TA, TS, and BG but were below baseline in IO and SS (Table 1). Groundwater levels in SS continue to be below baseline. For example, in the northern portion of the wellfield, indicator well 447T was still -8.4 ft below baseline.

Table 1. Summary by wellfield of average measured DTW (on March 31 or April 1, 2024) change from April 2023 and deviation from baseline in indicator wells.

Wellfield	Change from April 2023	Deviation from Baseline in 2024
	ft	ft
Laws	6.1	8.5
Big Pine (BP)	4.7	6.6

[1] The precipitation gauges are Bishop Airport, Big Pine, Tinemaha Reservoir, Los Angeles Aqueduct Intake, Independence Yard, Alabama Gates, Lone Pine, Cottonwood Gate and South Haiwee Reservoir (LADWP Owens Valley Annual Report Table 2.6).

[2] Bishop and Lone Pine wellfields are not discussed here because regression modeling is not conducted for these wellfields. Pumping in the Bishop wellfield must comply with the Hillside Decree and the proposed pumping for Lone Pine is currently for mitigation and town supply only.

Wellfield	Change from April 2023	Deviation from Baseline in 2024
	ft	ft
Taboose-Aberdeen (TA)	4.3	3.8
Thibaut-Sawmill (TS)	0.9	6.2
Independence-Oak (IO)	1.7	-0.4
Symmes-Shepherd (SS)	1.8	-2.9
Bairs-George (BG)	3.6	3.2
Wellfield Average	**+3.3**	**+3.6**

Evaluation of 2024-2025 Operations Plan

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 wellfield, and groundwater uses within each wellfield.

The models ICWD uses to analyze LADWP's annual operations plan predict water levels one year in the future (e.g., April 2024 to 2025) at 46 indicator wells based on the runoff forecast, 2024 water table elevation, and planned annual pumping for each of the seven wellfields included in the analysis. LADWP's 2024-25 proposed low-end and high-end pumping amounts were analyzed and the results are reported herein (Table 2 by wellfield and Appendix B by indicator well). The set of indicator wells used by ICWD differs from the set of indicator wells used by LADWP (Table 1.7 of the Draft Plan), but the Inyo and LADWP average predicted water table changes generally agree (Table 2).

In most years, ICWD proposes a reduced pumping amount that is based on water levels, vegetation conditions, and potential groundwater declines from LADWP pumping. In this case, reduced pumping below the proposed minimum (51,470 AF) is not recommended for the ensuing year since LADWP's proposed minimum pumping is below estimated minimum requirements for in-valley beneficial uses (56,780 AF). Thus, an analysis of ICWD estimated minimum pumping for years of approximately or below average runoff is not relevant to this year's draft pumping plan since antecedent conditions are near basin full levels due to the historic 2023-24 runoff year.

Table 2. Comparison of the range in average predicted water level changes in 2024-25 for LADWP minimum and maximum proposed pumping using the LADWP set of indicator well models (Table 1.7 of the Draft Plan) and the set of models used by ICWD.

Wellfield	2024-25 avg. change (ft) LADWP	2024-25 avg. change (ft) ICWD	2025 avg. depth (ft-bgs) ICWD
Laws	-3.5 to -4.3	-5.4 to -6.0	11.2 to 11.9
Big Pine	+0.2 to -1.7	-1.0 to -1.9	8.9 to 9.9
Taboose-Aberdeen	-0.5 to -1.1	-1.1 to -2.1	10.7 to 11.7
Thibaut-Sawmill	+0.1 to -0.6	+0.5 to -0.1	4.7 to 5.3
Independence-Oak	-0.8 to -2.2	-0.8 to -1.7	4.1 to 5.0
Symmes-Shepherd	-0.8 to -2.3	0.0 to -0.8	9.8 to 10.6
Bairs-George	-1.6 to -1.9	-1.9 to -2.9	6.1 to 7.1
Owens Valley	**-1.0 to -2.0**	**-1.4 to -2.2**	**7.9 to 8.8**

Proposed pumping scenarios

LADWP Proposed Minimum Pumping for 2024-25 (51,470 AF)

Average water levels are predicted to decrease from spring 2024 to 2025 under LADWP's minimum pumping scenario in five (5) of seven (7) wellfields (above baseline in Laws, BP, TA, TS, and BG; below baseline in IO and SS). The average deepening of the water table across the 46 wells is estimated to be -1.4 ft year-over-year (Table 2), yet still +2.2 ft above baseline (Appendix B).

LADWP Proposed Maximum Pumping for 2024-25 (77,413 AF)

Average water levels would be expected to decrease from 2024 to 2025 under LADWP's maximum pumping scenario in all seven analyzed wellfields. The average deepening of the water table across the 46 wells averaged is estimated to be -2.2 ft year-over-year (Table 2), yet still +1.4 ft above baseline. Similar to the minimum pumping scenario, water levels in Laws, BP, TA, TS, and BG would be above baseline and IO and SS would be below baseline (Appendix B).

Evaluation by Wellfield

Laws

In 2023-24 ROY, LADWP preliminarily reported a groundwater pumping volume of 1,984 AF

from Laws wellfield. From April 2023 to 2024, water levels increased by +6.1 ft across indicator wells on average (Table 1). DTW ranged between +3.4 ft (434T) to +19.0 ft (492T) above baseline in spring 2024 (Appendix A), with the wellfield average +8.5 ft above baseline (Table 1). Under LADWP's maximum proposed pumping scenario, spring 2025 water levels are predicted to decrease -6.0 ft compared to spring 2024 (Table 2). Vegetation cover and grass recovery has been observed since the end of the 2012-2016 drought in some parcels; however, the groundwater regime in Laws varies more than other wellfields owing to the inconsistent nature of when the McNally canals are activated for spreading. Minimizing water level declines below the root zone of perennial grass (greater than 6 ft below ground surface) should continue to allow the potential for grass recovery. Therefore, LADWP's 2024-25 proposed minimum pumping of 5,500 AF for irrigation and mitigation obligations is recommended. Pumping for export from Laws is unnecessary operationally this year, because water spread in this wellfield will drain to the river.

The 2024-25 Draft Plan includes a proposed aquifer test at production well W386 (similar to the two-month 2019-20 test of production well W385). LADWP intends to submit a testing plan, with expanded monitoring and an updated trigger mechanism, to the Technical Group for consideration. LADWP prepares quarterly reports on groundwater level and surface water data that are available for download on their website (W385/W386 Operational Test Baseline Hydrologic Study) in preparation for the proposed test. Before a Well 386 pumping test may occur, the Technical Group must jointly develop and approve a monitoring and management plan for the Well 386 pumping test that will ensure that the test will not cause any adverse effects to vegetation in the Five Bridges Impact Area and no other adverse environmental impacts. Moreover, the Technical Group must again amend the 1999 Revegetation Plan to allow the proposed pumping test of Well 386 to proceed in accordance with the jointly developed monitoring and management plan (such amendment shall temporarily suspend the provision requiring Wells 385 and 386 be "permanently shut down").

Groundwater level in indicator well 438T, in the vicinity of these production wells, is currently above baseline (+3.7 ft). These spring 2024 measured water level depths are compatible with the 2019 settlement conditions of "favorable hydrologic conditions" required to conduct the W386 test in 2024-25 ROY.

Big Pine

In 2023-24 ROY, LADWP pumped 13,591 AF of water from Big Pine wellfield. Due to hatchery operations at Fish Springs, Big Pine is the most consistently pumped wellfield in Owens Valley, and the only wellfield that has been in recent years near its groundwater mining limit. There was reduced pumping at the hatchery in 2020 and 2021 related to a bacterial infestation, and pumping in Big Pine was approximately 68% of previous years (15,531 avg. AF). Due to this reduced pumping, recovery was observed in the deeper, volcanic cinder aquifer zones. Average water levels in the shallow-aquifer indicator wells remained above baseline (+6.6 ft) for the fifth

consecutive year. Compared to spring 2024, LADWP's maximum pumping scenario is associated with predicted decreases of -1.9 ft by spring 2025. Statistically, BGP162 typically measures below baseline vegetation cover, though 2017 and 2019 saw recovery to baseline for this Type B, Nevada Saltbush Scrub parcel. In years where surface water is available to meet irrigation needs, no additional pumping should occur in Big Pine other than that necessary for in-valley uses. Therefore, LADWPs proposed pumping minimum (14,700 AF) is recommended.

The pumping plan also includes LADWP's intention to conduct operational testing of W415 for supplying both the Big Pine water system and the town ditch system. A proposed 6-month test has been approved by the Technical Group. Data generated from the test will be analyzed by the Technical Group, which will then determine whether to develop a monitoring and operations plan which must be consistent with the LTWA protections for vegetation and non-LADWP wells. The proposed test is necessary to calibrate and test the groundwater model which will be used along with monitoring results to determine if long-term operation is possible without causing significant adverse effects to the environment or to private wells.

Taboose-Aberdeen

In Taboose-Aberdeen, LADWP pumped 4,410 AF in 2023-24 ROY. Groundwater levels in wells rose by an average of +4.3 ft and are above baseline by an average of +3.8 ft. Under LADWP's maximum pumping scenario, modeled water levels are predicted to decrease by an average of -2.1 ft. Water levels in eight (8) of 10 indicator wells in TA would remain above baseline in 2025 by an average of +1.7 ft, providing an opportunity to discuss land management to arrest and reverse shrub encroachment in Type C parcels TIN064, TIN050, TIN053, and TIN068. Water level in nearby well 420T was approximately 7.7 ft-bgs as of late March 2024. LADWP's proposed pumping minimum (6,750 AF) or less is recommended along with exploration of land management techniques that might recover grass dominance in the mentioned parcels, given the high water table. Groundwater levels would decrease in most (i.e., 9 of 10) indicator wells, but are predicted to remain above baseline in 2025 by an average of +2.7 ft.

Thibaut-Sawmill

In Thibaut-Sawmill, LADWP pumped 7,568 AF in 2023-24. Groundwater levels in all three indicator wells are above baseline and would remain so under LADWP's maximum proposed pumping; however, this wellfield can be differentiated into two regions. The northern half of TS has seen significant water table recovery since the reduction in Blackrock Hatchery pumping. All three TS indicator wells are in the northern half of the wellfield.

In the southern half of the wellfield, vegetation parcels BLK094, IND026, and IND029 experienced a decline in grass cover and increase in shrub cover by the early 1990s coincident with LADWP maximum pumping and severe multiyear drought. Based on the larger set of monitoring wells, groundwater levels in a few wells are deeper than 10 ft-bgs (e.g. 052AT, 659T and 676T). Spring 2024 water levels are below baseline by more than four (4) ft in one well

(052AT).

Therefore, pumping in southern TS from W382 would be counter to the Agreement without a plan to sustainably manage these parcels in a Type C state. W380 and W381 are screened in the deeper aquifer that is potentially associated with Thibaut Springs discharge. Furthermore, W103 and W104 are also deeper aquifer wells in the southern half of TS that have consistent artesian outflow (pumping stress). Therefore, ICWD recommends a pumping amount equal to the Blackrock Hatchery needs and potential summer irrigation pumping from W155 for 8-Mile ranch (if creek flow is insufficient) and as little as operationally feasible from W380/381. LADWP's proposed pumping minimum (8,000 AF) is recommended. This amount of pumping will allow water levels to increase +0.5 ft on average in the northern half of the wellfield. The increase under this scenario is unknown in the southern half of the wellfield since there are no established indicator wells for use in predictive modeling. However, 14 of the 20 measured monitoring wells in this area had DTWs less than 6 ft-bgs in spring 2024.

Independence-Oak

In Independence-Oak, LADWP pumped 5,359 AF in 2023-24 ROY. ICWD has expressed concerns in the past about persistent water level declines in Independence-Oak. Water levels have recovered somewhat from depressed levels from pumping and/or drought resulting from 2017-18, 2019-20, and 2023-24 high runoff years and less 2023-24 pumping than planned. As of April 2024, water levels are on average within -0.4 ft of baseline.

Production wells W391 and W400 are controlled by On/Off vegetation monitoring site IO#1 that was turned to On status in April 1, 2024. It is likely that LADWP plans to pump these wells in the ensuing year if the IO#1 site stays in On status as of July 1 and October 1, 2024. Pumping in IO should be limited to in-valley uses (estimated 6,420 AF, which is less than LADWP's proposed 6,960 AF pumping minimum) to the extent practicable to promote continued water table recovery.

Symmes-Shepherd

In Symmes-Shepherd, LADWP pumped 623 AF in 2023-24 ROY. From 2016-17 through 2019-20, pumping was limited to irrigation supply from W402 with an average annual pumping of approximately 1,000 AFY. In 2021-22, W092 pumped approximately 1,000 AF. In 2023-24, groundwater was only pumped from W402.

Water levels in SS recovered from severe drought and rose by an average of +1.8 ft relative to spring 2023. However, levels remain below baseline in six (6) of the seven (7) indicator wells located within the wellfield (-2.9 ft average). LADWP's maximum pumping scenario likely includes pumping from W396 (On/Off site SS#3) in the southern portion of the wellfield. On/Off site SS#3 achieved on status in April 2021. If SS pumping is limited to in-valley uses only (1,200 AF), then a limited amount of pumping from W396 could be acceptable and allow for LADWP operational testing of the W402 replacement well, W428, drilled in 2022. LADWP

has pump-equipped the replacement well and plans to start operating it during the 2024 irrigation season.

LADWP's proposed pumping minimum (2,640 AF) is recommended or less if operationally feasible. No net change in groundwater levels under this scenario is predicted from spring 2024 to 2025 (0.0 ft average). Water levels would remain below baseline in spring 2025 by an average of -2.9 ft.

Bairs-George

In Bairs-George, LADWP reported 0 AF of pumping in 2023-24. Average wellfield groundwater levels rose +3.6 ft relative to spring 2023 and were +3.2 ft above baseline. Pumping in this wellfield should be managed to continue total cover and grass cover recovery. Type B parcel MAN037, classified as Nevada Saltbush Scrub, reached baseline in 2019 and 2020, but was marginally below baseline in 2023 and is sensitive to groundwater fluctuations. Therefore, the ICWD recommended pumping amount for this wellfield is LADWP's proposed pumping minimum (900 AF) or less if operationally feasible. Groundwater levels would decrease in indicator wells by an average of -1.9 ft and levels would remain above baseline in 2025 by an average of +1.4 ft.

In summary, the County recommends pumping at the low end of the range to minimize decreases in water levels and promote continued water table recovery where possible. Pumping should be reduced below the proposed minimum, if possible, in southern Thibaut-Sawmill and Symmes-Shepherd wellfields. Finally, the County recommends that a focus of the Technical Group in the upcoming years should be centered around cooperative studies to recommend how best to monitor the effects of deep well pumping, how to fulfill Agreement vegetation goals in perpetuity, and how to leverage new technologies in supporting these efforts.

We look forward to addressing these comments at the May 9, 2024, Technical Group meeting. If you wish to discuss these comments prior to the meeting, please contact me.

Sincerely,

Holly Alpert

Holly Alpert, Ph.D.
Director, Inyo County Water Department

cc: Inyo County Board of Supervisors
Inyo County Water Commission
Nate Greenberg, Inyo County CAO
John Vallejo, Inyo County Counsel
Greg James, Special Counsel

Appendix A. Indicator wells DTW, measured on March 31 or April 1, 2024. Negative values denote a decline in water level. DTW shown is from reference point (RP) 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 2024	Change from April 2023	Deviation from Baseline in 2024
	ft	ft	ft
Laws			
107T	16.71	8.87	7.56
434T	4.18	2.14	3.42
436T	4.35	1.43	3.75
438T	5.94	7.09	3.66
490T	3.80	9.41	9.27
492T	13.85	11.44	18.95
795T, LW1	2.78	3.99	10.51
V001G, LW2	8.22	11.84	11.40
574T, LW3†	4.69	-0.91	8.39
Big Pine			
425T	1.67	12.29	13.23
426T	6.75	4.56	4.82
469T	19.30	2.80	2.37
572T	6.96	1.15	4.94
798T, BP1	9.12	1.54	6.93
799T, BP2	16.72	2.30	1.79
567T, BP3	2.69	8.92	11.27
800T, BP4	6.35	4.16	7.24
Taboose-Aberdeen			
417T	21.24	6.77	5.73
418T	3.72	2.65	4.51
419T, TA1	3.64	1.18	2.99
421T	30.25	7.63	4.10
502T	7.11	3.86	0.38
504T	5.84	4.03	4.93
505T	12.88	7.16	5.72
586T, TA4	4.08	2.51	4.24
801T, TA5	14.08	0.25	-0.56

Station ID, Monitoring site	DTW April 2024	Change from April 2023	Deviation from Baseline in 2024
	ft	ft	ft
803T, TA6	2.87	6.63	5.83
Thibaut-Sawmill			
415T	8.40	3.07	10.10
507T	4.02	-2.01	0.65
806T, TS2	5.27	1.65	7.91
Independence-Oak			
406T	1.57	-0.44	0.00
407T	9.38	1.35	-2.08
408T	2.80	-0.20	0.33
409T	0.95	4.01	0.65
546T	4.03	1.14	-0.60
809T, IO1	7.45	4.34	-0.88
Symmes-Shepherd			
402T	9.47	0.65	-1.44
403T	4.79	1.71	0.54
404T	4.82	-0.18	-1.25
447T	30.20	6.69	-8.33
510T	6.56	-0.63	-1.56
511T	6.44	-0.74	-1.81
V009G, SS1	13.11	5.03	-6.28
Bairs-George			
398T	3.49	1.21	2.86
400T	4.92	0.24	1.38
812T, BG2	7.87	9.20	5.47

†: Test Well 840T (completed in 2001) at LW3 tracks 574T (completed in 1985) except during active spreading on the site, and depth to water is on avg. 1.23 ft deeper (original note from ICWD 2013-14 Annual Report).
††: Values in this table are significant to 0.1 ft. Extra digits are presented for rounding transparency.

Appendix B. ICWD predicted water level changes at indicator monitoring well sites for LADWP's proposed pumping in their draft 2024-25 annual operations plan. Negative DTW values denote a water level decline.

Station ID, Monitoring site	LADWP Min. (51,470 AF) 2025 vs 2024	LADWP Min. (51,470 AF) 2025 vs Baseline	LADWP Max. (77,413 AF) 2025 vs 2024	LADWP Max, (77,413) AF 2025 vs Baseline
	DTW change ft	DTW change ft	DTW change ft	DTW change ft
Laws **(Avg.)**	**-5.4**	**+3.2**	**-6.0**	**+2.5**
107T	-6.01	1.55	-6.94	0.62
434T	-1.30	2.12	-1.70	1.72
436T	-2.68	1.07	-3.09	0.66
438T	-3.83	-0.17	-4.17	-0.51
490T	-2.91	6.35	-3.09	6.18
492T	-8.33	10.62	-9.82	9.13
795T	-8.30	2.21	-9.62	0.89
V001g	-8.15	3.25	-8.92	2.48
574T	-6.68	1.71	-7.10	1.29
Big Pine	**-1.0**	**+5.6**	**-1.9**	**+4.6**
425T	-1.25	11.98	-2.37	10.86
426T	-0.12	4.69	-0.76	4.06
469T	-0.32	2.04	-0.93	1.44
572T	-0.98	3.96	-2.20	2.74
798T, BP1	-3.44	3.49	-4.51	2.41
799T, BP2	0.16	1.96	-0.42	1.37
567T, BP3	-1.71	9.56	-2.71	8.56
800T, BP4	-0.14	7.10	-1.50	5.74
Taboose-Aberdeen	**-1.1**	**+2.7**	**-2.1**	**+1.7**
417T	-1.66	4.06	-2.86	2.87
418T	-0.45	4.06	-0.97	3.54
419T, TA1	-0.65	2.35	-1.88	1.11
421T	-1.54	2.57	-2.79	1.32
502T	-0.81	-0.42	-1.38	-1.00
504T	-1.50	3.43	-3.03	1.90
505T	-1.54	4.18	-2.77	2.95
586T, TA4	-0.84	3.41	-1.86	2.39
801T, TA5	0.35	-0.21	0.06	-0.49
803T, TA6	-1.99	3.85	-3.12	2.71
Thibaut-Sawmill	**+0.5**	**+6.7**	**-0.1**	**+6.1**
415T	0.83	10.93	-0.44	9.66
507T	0.40	1.04	0.13	0.77
806T, TS2	0.25	8.16	-0.08	7.83

Station ID, Monitoring site	LADWP Min. (51,470 AF) 2025 vs 2024	LADWP Min. (51,470 AF) 2025 vs Baseline	LADWP Max. (77,413 AF) 2025 vs 2024	LADWP Max, (77,413) AF 2025 vs Baseline
	DTW change ft	DTW change ft	DTW change ft	DTW change ft
Independence-Oak	**-0.8**	**-1.2**	**-1.7**	**-2.1**
406T	-0.51	-0.51	-0.72	-0.72
407T	-0.40	-2.48	-1.41	-3.49
408T	-0.27	0.06	-0.94	-0.61
409T	-1.63	-0.98	-3.70	-3.05
546T	-1.35	-1.95	-1.79	-2.39
809T, IO1	-0.56	-1.44	-1.59	-2.47
Symmes-Shepherd	**0.0**	**-2.9**	**-0.8**	**-3.6**
402T	-0.06	-1.50	-0.33	-1.78
403T	-0.29	0.25	-1.05	-0.51
404T	0.04	-1.21	-0.24	-1.49
447T	0.10	-8.24	-1.65	-9.99
510T	0.13	-1.43	-0.14	-1.70
511T	0.04	-1.76	-0.24	-2.05
V009G, SS1	-0.05	-6.34	-1.60	-7.89
Bairs-George	**-1.9**	**+1.4**	**-2.9**	**+0.4**
398T	-1.36	1.50	-2.82	0.04
400T	-0.71	0.67	-0.98	0.40
812T	-3.51	2.08	-4.79	0.80
Wellfield Avg.	**-1.4**	**+2.2**	**-2.2**	**+1.4**

†: Values in this table are significant to 0.1 ft. Extra digits are presented for rounding transparency.