(760) 878-0001
FAX: (760) 878-2552

EMAIL: mail@inyowater.org
WEB: http://www.inyowater.org

P.O. Box 337
135 South Jackson Street
Independence, CA 93526

COUNTY OF INYO
WATER DEPARTMENT

April 30, 2025

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 2025-2026

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 2025-2026 (Draft Plan).

General comments and recommendations

ICWD notes that the 2024-25 pumping was lower (48,678 acre-feet) than the predicted minimum from last year's Operations Plan. However, this amount of pumping still resulted in a lowering of depth to water (DTW) of -1.5 feet valley-wide, with the largest decline (-3.4 ft) occurring in the Laws wellfield. Together with average runoff, this low pumping helped to maintain water tables to above baseline in many (but not all) parts of the Owens Valley.

The Draft Plan indicates that 67,860 – 88,560 acre-feet (AF) of groundwater is planned to be pumped during the 2025-26 runoff year and that runoff is forecast to be 92% of normal. Given the nearly-average water year with sufficient runoff available, the County urges minimizing groundwater pumping for export and focusing instead on in-valley uses. The County recommends 48,720 AF of pumping for 2025-26 which is approximately what LADWP pumped in 2024-25. This figure represents LADWP minimum proposed pumping from the previous year's Plan (2024-25) for all wellfields but Taboose-Aberdeen. Because of the relatively high

minimum proposed pumping for that wellfield for 2024-25 (6,750 AF), along with current groundwater and vegetation conditions, the County recommends a reduced extraction of 4,000 AF. This will minimize the groundwater decline in the wellfield but is still well above the pumping needed for in-valley uses.

That Draft Plan includes proposed tests of W386 in Laws Wellfield (Five Bridges area) and W416 in Lone Pine Wellfield. LADWP has also proposed equipping W429 and the construction of new wells B-2 and B-5 in the Bishop area. All of these wells are designed to pump from the deep aquifer. The Technical Group's historical strategy of managing pumping based on soil moisture and vegetation conditions in proximity to a pumping well is largely ineffective in protecting against potential delayed impacts associated with pumping of the deep aquifer. Other management strategies for these wells will need to be developed.

LADWP and the ICWD have had preliminary discussions concerning a cooperative study to address the impacts of deep well pumping and how to monitor and manage for potential impacts. In view of the foregoing, we recommend this cooperative study be agreed upon prior to the pumping of W386 or W416; and prior to the construction of B-2 or B-5. The study protocol may provide that data from the test pumping of these wells be used as part of the cooperative study.

LADWP and the County jointly 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 the 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 stated in past letters that it disagrees with LADWP's calculation of an imbalance in water being supplied to E/M projects. The E/M projects are listed as mitigation measures in the 1991 EIR and as such must be supplied with adequate water for project maintenance. LADWP agreed to pumping management in compliance with the Green Book and to protect vegetation and also agreed to continue to supply E/M projects, many of which were included as mitigation in the 1991 EIR. The County also 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.

Section 1.4 of the Draft Plan breaks out Owens Valley export from Eastern Sierra export. Because the large majority of Eastern Sierra export comes from the natural Owens River watershed, a

watershed-wide number should also be provided (similar to the Owens River Basin runoff figure given in Table 1.1). Similarly, all Owens River Basin water should be considered native to the Owens Valley, so the negative export numbers in Figure 1.12 do not actually represent imported water for Owens Valley uses.

There is a typo in the Draft Plan that should be fixed. Section 2.1 denotes that *"Table 2.1 lists Owens Valley monitoring ON/OFF status as of April 2023..."*. The table actually shows ON/OFF status as of April 2025.

The County has a number of comments in Section 3 of the Draft Plan. Table 3.1 indicates that the Laws Area Revegetation Project is complete and that LADWP and Inyo County are working together to confirm these findings. The County affirms that it is in discussions with LADWP about the Laws Type E Transfer MND parcels, but there have been no recent discussions of the Laws Area Revegetation Project, and the County considers the project fully implemented but not meeting goals, contrary to LADWP's complete designation.

Also on Table 3.1, the County is pleased to observe that the Five Bridges Area Revegetation Project is no longer listed as complete. A productive discussion in March 2025 among the MOU parties focused on the persistent *Lepidium latifolium* presence, and it was agreed that the parties would form a work group to discuss possible solutions. LADWP now lists this project as implemented and ongoing; the County's assertion is that the project is implemented but not meeting goals and will designate it as such in its annual report.

Section 3.2.2. discusses the irrigation project in the Laws area (Laws Type E Transfer). As indicated above, the County affirms that it is in discussions with LADWP on an amendment to the 2003 revegetation plan. The County agrees that the elements of the amendment listed in this section are those under discussion; however, the County disagrees with the suggestion that these items are settled. Several issues are still under discussion between the two parties, and the MOU parties will be consulted before any amendment is finalized. Finally, because the 2003 revegetation plan is part of a CEQA document, any amendment will need to go through a CEQA process.

Table 3.2 indicates that the status of the release of City owned lands – Inyo County is "completed". The County strenuously disagrees that LADWP complied with the requirement regarding land releases pursuant to Section XV.A of the Long Term Water Agreement. The County intends to continue raising such issues in the appropriate forum(s)

2024-2025 Groundwater Conditions in Indicator Wells

LADWP preliminary reported pumping for 2024-25 runoff year (ROY) is 48,678 AF. Over this

same period, Owens Valley rain gauges[1] measured average ROY precipitation as 3.2 inches (57% of normal to-date on April 1, 2025, as noted above). This combination of lower-than-average pumping, below average valley floor precipitation, and average 2024-25 runoff contributed to spring 2025 average groundwater level lowering in each of the seven analyzed wellfields[2] compared to spring 2024. This is not surprising considering the basin's antecedent conditions where groundwater levels were high in many areas following the historic wet winter of 2023 and subsequent surface water spreading.

Table 1 is a summary of groundwater level changes by wellfield observed in spring 2025 compared to 2024 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 2025.

Across the 46 indicator wells, water levels decreased (i.e., deepened) in 42 wells and increased slightly in four (4) wells from spring 2024 to 2025. Across all wellfields, water levels declined by an average of -1.5 feet (ft) and were, on average, +2.1 ft above baseline levels. Given spring 2024 water levels and LADWP minimum proposed pumping, spring 2025 water levels were predicted to decline -1.4 ft.

As of April 2025, 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 -9.7 ft below baseline.

Table 1. Summary by wellfield of average measured DTW (on March 31 or April 1, 2025) change from April 2024 and deviation from baseline in indicator wells.

Wellfield	Change from April 2024	Deviation from Baseline in 2025
	ft	ft
Laws	-3.4	5.1
Big Pine (BP)	-1.5	5.1
Taboose-Aberdeen (TA)	-0.6	3.1
Thibaut-Sawmill (TS)	-0.9	5.3
Independence-Oak (IO)	-1.6	-2.1

[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 2024	Deviation from Baseline in 2025
	ft	ft
Symmes-Shepherd (SS)	-0.4	-3.3
Bairs-George (BG)	-2.1	1.2
Wellfield Average	**-1.5**	**2.1**

Evaluation of 2025-2026 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 2025 to 2026) at 46 indicator wells based on the runoff forecast, 2025 water table elevation, and planned annual pumping for each of the seven wellfields included in the analysis. LADWP's 2025-26 proposed low-end, high-end (Table 2 by wellfield average) and Inyo County recommended reduced pumping amounts were analyzed, and the results are reported herein (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).

Table 2. Comparison of the range in average predicted water level changes in 2025-26 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	2025-26 avg. change (ft) LADWP (Table 1.7)	2025-26 avg. change (ft) ICWD	2026 avg. depth (ft-bgs) ICWD
Laws	-3.3* to -4.5	-4.8 to -5.9	14.0 to 15.1
Big Pine	-0.7 to -2.7	-1.1 to -2.1	10.6 to 11.5
Taboose-Aberdeen	-1.1 to -1.8	-1.9 to -3.1	12.1 to 13.3
Thibaut-Sawmill	-1.0	-0.4	6.5
Independence-Oak	-0.6 to -2.0	-0.6 to -1.5	5.5 to 6.4
Symmes-Shepherd	-1.3	-0.3	10.5
Bairs-George	-0.4 to -0.8	-1.2 to -2.3	7.5 to 8.7
Owens Valley	**-1.2 to -2.0**	**-1.5 to -2.2**	**9.5 to 10.3**

*LADWP value is understood to be revised to -3.1 in the final report

Proposed pumping scenarios

LADWP Proposed Minimum Pumping for 2025-26 (67,860 AF)

Average water levels are predicted to decrease from spring 2025 to 2026 under LADWP's minimum pumping scenario in all seven analyzed wellfields (above baseline water levels in Laws, BP, TA and TS; below baseline in IO and SS; and at baseline in BG). The average deepening of the water table across the 46 wells is estimated to be -1.5 ft year-over-year (Table 2), yet still +0.6 ft above baseline (Appendix B).

LADWP Proposed Maximum Pumping for 2025-26 (88,560 AF)

Average water levels are predicted to decrease from 2025 to 2026 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), and -0.1 ft below baseline. Water levels in BP, TA and TS would be above baseline and Laws, IO, SS and BG would be below baseline (Appendix B).

Inyo County Recommended Reduced Pumping for 2025-26 (48,720 AF)

ICWD developed a third pumping scenario to analyze a reduced pumping amount that sums to 48,720 AF. The scenario takes into consideration water levels relative to baseline levels, vegetation conditions in associated wellfield parcels, and seeks to balance the core principles of the Water Agreement. ICWD's reduced pumping scenario includes LADWP minimum proposed pumping from the previous year's Plan (2024-25) for all wellfields but Taboose-Aberdeen. Because of the relatively high minimum proposed pumping for that wellfield for 2024-25 (6,750 AF), along with current groundwater and vegetation conditions, the County recommends a lower extraction amount of 4,000 AF. This amount is approximately what LADWP actually pumped in 2024-25 (i.e., 3,985 AF). This will minimize the groundwater decline in the wellfield but is still well above the pumping needed for in-valley uses.

Average water levels are predicted to still decrease from spring 2025 to 2026 under ICWD's recommended reduced pumping scenario in six of seven analyzed wellfields. The average deepening of the water table across the 46 wells is estimated to be -1.0 ft year-over-year, but +1.1 ft above baseline (Table 3 and Appendix B). Similar to observed spring 2025 conditions, water levels in Laws, BP, TA, TS and BG would be above baseline; and IO and SS would be below baseline (Table 3 and Appendix B).

Table 3. Average predicted water level changes and depth below ground surface in 2025-26 for ICWD recommended reduced pumping by wellfield amount using the ICWD set of models.

Wellfield	ICWD Recommended Reduced 2025-26 Pumping (AF)	ICWD Reduced (48,720 AF) 2026 vs 2025 avg. change (ft)	ICWD Reduced (48,720 AF) 2026 vs Baseline avg. change (ft)	ICWD Reduced (48,720 AF) 2026 avg. depth (ft-bgs)
Laws	5,500	-4.6	0.5	13.8
Bishop	5,120	N/A	N/A	N/A
Big Pine	14,700	-0.8	4.3	10.3
Taboose-Aberdeen	4,000	-0.5	2.6	10.8
Thibaut-Sawmill	8,000	0.5	5.7	5.7
Ind.-Oak	6,960	-0.5	-2.6	5.5
Symmes-Shepherd	2,640	-0.1	-3.4	10.3
Bairs-George	900	-0.9	0.3	7.3
Lone Pine	900	N/A	N/A	N/A
Owens Valley	**48,720**	**-1.0**	**1.1**	**9.1**

Evaluation by Wellfield

Laws

In 2024-25 ROY, LADWP preliminarily reported a groundwater pumping volume of 4,293 AF from Laws wellfield. From April 2024 to 2025, water levels deepened by -3.4 ft across indicator wells on average (Table 1). DTW ranged between +0.8 ft (438T) to +11.6 ft (492T) above baseline in spring 2025 (Appendix A), with the wellfield average +5.1 ft above baseline (Table 1). Under LADWP's maximum proposed pumping scenario, spring 2026 water levels are predicted to decrease -5.9 ft compared to spring 2025 (Table 2). Recovery of vegetation cover, and notably grass cover, has been observed since 2017 in many Laws parcels that are chronically below baseline; however, the groundwater regime in Laws varies more than other wellfields owing in part to the inconsistent nature of when the McNally canals are activated for spreading and whether or not pumping in excess of in-valley uses occurs. 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.

The 2025-26 Draft Plan includes a proposed aquifer test at production well W386 (similar to the two-month 2019-20 test of production well W385). It is understood that 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. As stated previously, Inyo County recommends that a deep aquifer pumping cooperative study be agreed upon prior to the pumping of W386. 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"). In addition, LADWP must comply with the provisions of the two settlement agreements entered into before the 2019 test of W385. Groundwater level in indicator well 438T, in the vicinity of these production wells, is currently above baseline (+0.8 ft). However, available groundwater level depths should be examined as a component of the monitoring and management plan to determine if they are compatible with the 2019 settlement conditions of "favorable hydrologic conditions" required to conduct the W386 test in 2025-26 ROY.

Big Pine

In 2024-25 ROY, LADWP pumped 17,119 AF of water from Big Pine wellfield. Due in part 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 (+5.1 ft) for the sixth consecutive year. Compared to spring 2025, LADWP's maximum pumping scenario is associated with predicted decreases of -2.1 ft by spring 2026. Statistically, BGP162 typically measures below baseline vegetation cover, though as recently as 2019 saw recovery to baseline for this Type B, Nevada Saltbush Scrub parcel. Though increases in 2023-24, compared to 2020-22, were observed, cover remained below baseline. 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, LADWP's 2024-25 proposed pumping minimum (14,700 AF) is recommended.

Taboose-Aberdeen

In Taboose-Aberdeen, LADWP pumped 3,985 AF in 2024-25 ROY. Groundwater levels in wells declined by an average of -0.6 ft and are above baseline by an average of +3.1 ft. Under LADWP's maximum pumping scenario, modeled water levels are predicted to decrease by an average of -3.1 ft. Water levels in five (5) of 10 indicator wells in TA would remain above baseline in 2026 by an average of +0.1 ft, providing an opportunity to discuss land management to arrest and reverse shrub encroachment in Type C parcels TIN050, TIN053 and TIN064. Water level in nearby well 420T was approximately 8.1 ft-bgs as of late March 2025.

LADWP's 2024-25 and 2025-26 proposed pumping minimums (6,750 AF and 10,200 AF, respectively) are well above water needed for in-valley uses. The County recommends a reduced extraction of 4,000 AF. This will minimize the groundwater decline in the wellfield but is still above the pumping needed for in-valley uses. This reduced pumping amount is approximately the same amount LADWP pumped in 2024-25. Groundwater levels would still decrease in most (i.e., 9 of 10) indicator wells, but are predicted to remain above baseline under this scenario in 2026 by an average of +2.6 ft (Table 3 and Appendix B).

Thibaut-Sawmill

In Thibaut-Sawmill, LADWP pumped 7,365 AF in 2024-25. Groundwater levels in two of three indicator wells are above baseline (507T is at -0.3 ft-bgs relative to baseline) and would remain approximately at or above baseline under LADWP's proposed pumping amount; however, this wellfield can be differentiated into two regions. Since the reduction in Blackrock Hatchery pumping, the water table in the northern half of the TS wellfield has shown significant recovery. 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 showed a decline in grass cover and increase in shrub cover by the early 1990s coincident with LADWP maximum pumping and severe multiyear drought. BLK094 reached baseline total perennial cover in 2024 for the first time since 2000; grass cover is the highest it has been since 2003, yet still below baseline. 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) which is below the grass rooting zone. Spring 2025 water levels are below baseline by more than four (4) ft in one well (052AT).

Therefore, pumping in southern TS 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 2024-25 proposed pumping (8,000 AF) is recommended. This amount of pumping will raise water levels to +0.5 ft on average in the northern half of the wellfield. The water level changes under this scenario are unknown in the southern half of the wellfield since there are no established indicator wells for use in predictive modeling. However, around half of the measured monitoring wells (i.e., 9 of 20) in this area had DTWs less than 6 ft-bgs in spring 2025.

Independence-Oak

In Independence-Oak, LADWP pumped 8,472 AF in 2024-25 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 because of 2017-18,

2019-20, and 2023-24 high runoff. As of April 2025, water levels are on average -2.1 ft below baseline.

Production wells W391 and W400 are controlled by On/Off vegetation monitoring site IO#1 that was turned to On status in March 1, 2025. 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, 2025. LADWP's 2024-25 proposed pumping minimum (6,960 AF) is recommended. This amount of pumping will minimize predicted 2025 to 2026 water level declines to -0.5 ft on average in the wellfield. Water levels would remain below baseline in spring 2026 by an average of -2.6 ft. Pumping in IO should be limited to in-valley uses to the extent practicable to promote water table recovery to above baseline levels.

Symmes-Shepherd

In Symmes-Shepherd, LADWP pumped 2,602 AF in 2024-25 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. W428 was drilled to replace W402 and has been put into operation. In 2021-22, W092 pumped approximately 1,000 AF but available records show that it has not been pumped since then. However, a new pump was installed in 2024.

Water levels in SS have somewhat recovered from the severe drought years but declined by an average of -0.4 ft relative to spring 2024. Groundwater levels are below baseline in all seven (7) indicator wells located within the wellfield (-3.3 ft average). LADWP's proposed pumping amount 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.

LADWP's 2024-25 proposed pumping (2,640 AF) is recommended or less if operationally feasible. This amount of pumping will minimize predicted 2025 to 2026 water level declines to -0.1 ft on average in the wellfield. Water levels would remain below baseline in spring 2026 by an average of -3.4 ft.

Bairs-George

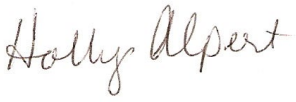
In Bairs-George, LADWP reported 113 AF of pumping in 2024-25. Average wellfield groundwater levels declined -2.1 ft relative to spring 2024 and were +1.2 ft above baseline. Pumping in this wellfield should be managed to continue total cover and grass cover recovery. Type B parcel MAN037, classified as Nevada Saltbush Scrub, reached baseline in 2024 when the water table was 2 ft shallower than Spring 2025. Therefore, the ICWD recommended pumping amount for this wellfield is LADWP's 2024-25 proposed pumping minimum (900 AF) or less if operationally feasible. Groundwater levels would decrease in indicator wells by an average of -0.9 ft and levels would be above baseline by an average of +0.3 ft in 2026.

In summary, the County recommends pumping approximately the amount LADWP pumped in

2024-25 to minimize decreases in water levels and promote continued water table and vegetation recovery where possible. 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 6, 2025, Technical Group meeting. If you wish to discuss these comments prior to the meeting, please contact me.

Sincerely,



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, 2025. 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 2025	Change from April 2025	Deviation from Baseline in 2025
	ft	ft	ft
Laws **(Avg)**		**-3.4**	**5.1**
107T	18.43	-2.58	4.98
434T	4.17	-0.75	2.67
436T	4.18	-1.02	2.73
438T	5.58	-2.85	0.81
490T	4.89	-2.65	6.62
492T	19.53	-7.34	11.61
795T, LW1	7.10	-4.89	5.62
V001G, LW2	9.47	-3.10	7.96
574T, LW3†	9.61	-5.14	3.25
Big Pine		**-1.5**	**5.1**
425T	5.59	-4.91	8.32
426T	6.11	-0.65	4.17
469T	18.31	-0.01	2.36
572T	7.79	-1.07	3.87
798T, BP1	11.02	-2.26	4.67
799T, BP2	15.94	0.04	1.83
567T, BP3	5.10	-2.99	8.28
800T, BP4	5.76	0.01	7.25
Taboose-Aberdeen		**-0.6**	**3.1**
417T	18.60	-0.91	4.82
418T	3.80	-0.73	3.78
419T, TA1	2.28	-0.12	2.87
421T	29.74	-0.63	3.47
502T	6.82	-0.43	-0.05
504T	6.21	-1.02	3.91
505T	13.28	-0.93	4.79
586T, TA4	4.55	-0.89	3.35
801T, TA5	13.82	0.17	-0.39

Station ID, Monitoring site	DTW April 2025	Change from April 2025	Deviation from Baseline in 2025
	ft	ft	ft
803T, TA6	3.24	-0.91	4.92
Thibaut-Sawmill		**-0.9**	**5.3**
415T	7.84	-0.38	9.72
507T	4.23	-0.96	-0.31
806T, TS2	6.35	-1.50	6.41
Independence-Oak		**-1.6**	**-2.1**
406T	2.54	-2.35	-2.35
407T	8.39	-0.15	-2.23
408T	1.99	-0.65	-0.32
409T	2.74	-3.07	-2.42
546T	5.07	-1.81	-2.41
809T, IO1	8.96	-1.82	-2.70
Symmes-Shepherd		**-0.4**	**-3.3**
402T	8.93	-0.15	-1.59
403T	4.95	-0.74	-0.20
404T	4.77	-0.37	-1.62
447T	31.02	-1.35	-9.68
510T	5.88	-0.07	-1.63
511T	5.31	0.46	-1.35
V009G, SS1	10.67	-0.64	-6.92
Bairs-George		**-2.1**	**1.2**
398T	3.00	-1.12	1.74
400T	4.39	-0.89	0.49
812T, BG2	11.60	-4.25	1.34

†: 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 (67,860 AF) 2026 vs 2025	LADWP MIN (67,860 AF) 2026 vs Baseline	LADWP MAX (88,560 AF) 2026 vs 2025	LADWP MAX (88,560 AF) 2026 vs Baseline	ICWD Reduced (48,720 AF) 2026 vs 2025	ICWD Reduced (48,720 AF) 2026 vs Baseline
	DTW change ft	DTW change ft	DTW change ft	DTW change ft	DTW change ft	DTW change ft
***Laws* (Avg.)**	**-4.8**	**0.4**	**-5.9**	**-0.7**	**-4.6**	**0.5**
107T	-6.36	-1.38	-7.86	-2.87	-6.19	-1.21
434T	-1.42	1.25	-2.06	0.61	-1.35	1.32
436T	-3.05	-0.32	-3.70	-0.97	-2.98	-0.25
438T	-3.25	-2.44	-3.79	-2.98	-3.19	-2.38
490T	-2.92	3.70	-3.20	3.42	-2.89	3.73
492T	-6.72	4.89	-9.13	2.48	-6.45	5.16
795T	-7.58	-1.96	-9.71	-4.10	-7.34	-1.73
V001g	-7.35	0.61	-8.59	-0.63	-7.22	0.74
574T	-4.16	-0.90	-4.83	-1.58	-4.08	-0.83
Big Pine	**-1.1**	**4.0**	**-2.1**	**3.0**	**-0.8**	**4.3**
425T	-1.11	7.21	-2.24	6.08	-0.75	7.57
426T	-0.48	3.69	-1.11	3.05	-0.28	3.89
469T	-0.70	1.66	-1.31	1.05	-0.50	1.85
572T	-1.31	2.56	-2.53	1.34	-0.92	2.95
798T, BP1	-2.41	2.26	-3.49	1.18	-2.07	2.60
799T, BP2	-0.24	1.59	-0.83	1.01	-0.06	1.77
567T, BP3	-1.79	6.49	-2.80	5.49	-1.47	6.82
800T, BP4	-0.82	6.44	-2.17	5.08	-0.38	6.87
Taboose-Aberdeen	**-1.9**	**1.3**	**-3.1**	**0.1**	**-0.5**	**2.6**
417T	-2.58	2.24	-4.00	0.82	-0.96	3.86
418T	-0.87	2.91	-1.48	2.30	-0.17	3.62
419T, TA1	-1.80	1.07	-3.26	-0.39	-0.13	2.74
421T	-2.62	0.85	-4.10	-0.63	-0.93	2.54
502T	-1.32	-1.37	-2.00	-2.04	-0.55	-0.59
504T	-2.59	1.31	-4.40	-0.49	-0.52	3.39
505T	-2.49	2.30	-3.93	0.86	-0.83	3.96
586T, TA4	-1.54	1.81	-2.74	0.61	-0.16	3.20
801T, TA5	-0.29	-0.67	-0.62	-1.01	0.09	-0.29
803T, TA6	-2.81	2.11	-4.14	0.78	-1.27	3.65

Station ID, Monitoring site	LADWP MIN (67,860 AF) 2026 vs 2025	LADWP MIN (67,860 AF) 2026 vs Baseline	LADWP MAX (88,560 AF) 2026 vs 2025	LADWP MAX (88,560 AF) 2026 vs Baseline	ICWD Reduced (48,720 AF) 2026 vs 2025	ICWD Reduced (48,720 AF) 2026 vs Baseline
Thibaut-Sawmill	**-0.4**	**4.9**	**-0.4**	**4.9**	**0.5**	**5.7**
415T	-1.13	8.59	-1.13	8.59	0.57	10.29
507T	0.28	-0.04	0.28	-0.04	0.64	0.33
806T, TS2	-0.24	6.17	-0.24	6.17	0.19	6.60
Independence-Oak	**-0.6**	**-2.7**	**-1.5**	**-3.6**	**-0.5**	**-2.6**
406T	-0.12	-2.47	-0.33	-2.68	-0.10	-2.46
407T	-0.46	-2.69	-1.47	-3.70	-0.37	-2.60
408T	-0.22	-0.53	-0.89	-1.21	-0.16	-0.48
409T	-1.25	-3.67	-3.34	-5.76	-1.08	-3.50
546T	-0.94	-3.35	-1.38	-3.79	-0.91	-3.31
809T, IO1	-0.54	-3.24	-1.58	-4.28	-0.45	-3.16
Symmes-Shepherd	**-0.3**	**-3.6**	**-0.3**	**-3.6**	**-0.1**	**-3.4**
402T	-0.20	-1.80	-0.20	-1.80	-0.12	-1.72
403T	-0.44	-0.64	-0.44	-0.64	-0.21	-0.41
404T	0.04	-1.59	0.04	-1.59	0.12	-1.50
447T	-0.77	-10.45	-0.77	-10.45	-0.24	-9.93
510T	0.06	-1.57	0.06	-1.57	0.14	-1.49
511T	-0.12	-1.46	-0.12	-1.46	-0.03	-1.38
V009G, SS1	-0.77	-7.70	-0.77	-7.70	-0.31	-7.23
Bairs-George	**-1.2**	**0.0**	**-2.3**	**-1.1**	**-0.9**	**0.3**
398T	-1.09	0.65	-2.72	-0.98	-0.68	1.06
400T	-0.34	0.15	-0.64	-0.15	-0.26	0.23
812T	-2.20	-0.86	-3.62	-2.28	-1.85	-0.51
Wellfield Averages	**-1.5**	**0.6**	**-2.2**	**-0.1**	**-1.0**	**1.1**

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