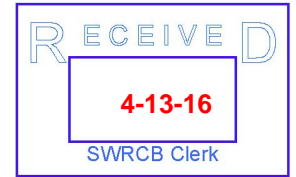




Phelan Piñon Hills Community Services District

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April 13, 2016

State Water Resources Control Board

Phelan Pinon Hills Community Services District (PPHCSD) is requesting the State Board consider modification of the following elements when considering a modification of the Emergency Regulation.

- **State Water Board should consider the reliability of urban water supplier supply portfolios in this emergency regulation.**
- **Groundwater supply in storage and Water Supply Enhancements should be included in a similar manor as the current version of the order that addresses surface water storage:** PPHCSD is located in an adjudicated groundwater basin managed by Mojave Water Agency, and has invested \$15,000,000 in additional water rights over the past 4 years. Through purchases from agricultural entities, the District has taken over 3000 a.f. of water out of production annually, and has many years of groundwater in storage. This is double the amount of water the District produces annually. This type of project fits perfectly within the Delta Reform Act, which will reduce or eliminate the need for the District to rely on State Project Water.
- **Adjudicated Basins are already being managed:** The basins PPHCSD overlies have been adjudicated and managed by the Watermaster for 20 years. As part of the Adjudication, PPHCSD has already been “ramped-down” in water production by 20%. We believe the State should allow local control for Regional management of basins.

Phelan Pinon Hills CSD respectfully requests your consideration of these issues in any extension of the Emergency Orders.

Don Bartz

General Manager