

Phelan Piñon Hills Community Services District

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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 an extension of the 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. The District has taken over 3000 a.f. of water out of production annually, and has
 many years of groundwater in storage. 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.
- Climate Adjustment should be considered: The District is located in the high desert where the weather in summer and fall reaches temperatures in excess of 100 degrees on a daily basis. Many of the Districts customers have 2.5 acre parcels of land where they grow livestock and gardens to help meet basic needs to survive. One horse requires approximately 50 gallons of water per day.
- Increase in population: Many of the homes in the PPHCSD area were vacant in 2013 due to the slow recovery in the real estate market and foreclosures in this community. The community has increased in population since 2013 and will continue to grow as the economy recovers.

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

Don Bartz

General Manager