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January 6, 2016

Jeanie Townsend, Clerk of the Board and
Tom Howard, Executive Director
State Water Resources Control Board
PO Box 100
Sacramento, CA 95812-0100

Subject: Comments on Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation

Dear Ms. Townsend and Mr. Howard:

On behalf of the Mojave Water Agency (MWA), thank you for the opportunity to provide further comment on the proposed regulatory framework for Extended Emergency Regulation for Urban Water Conservation. Specifically, MWA is asking for consideration of a lower tier for our Urban Water Suppliers (UWS) based on climate adjustment.

Located in the arid Mojave Desert, the Mojave region is a hydrologically diverse area encompassing some 4,900 square miles in the High Desert, in San Bernardino County. The IRWM Region includes portions of both the South Lahontan and Colorado River Hydrologic Regions. We serve a growing population of 450,000, and we enjoy a natural supply of groundwater from the Mojave River and imported supply from the State Water Project. We live in perpetual drought conditions, and therefore embrace conservation as a way of life, and exceeded the conservation goals set out in SBx7-7 in 2008 achieving a 30 percent reduction in consumption. Many of our UWS are close to meeting their monthly goals, and have aggressively employed numerous conservation programs to achieve further reductions. Unfortunately, in some cases, we are still falling short of our goals as we reside in one of the driest climates in the State.

Therefore, under the proposed regulatory framework document relative to the extended emergency regulation for Urban Water Conservation, issued on December 21, 2015, we request consideration of a reduction of up to 4 percentage points citing the climate adjustment stakeholder proposal. Urban Water Suppliers in the MWA zone fall under ET Zones of 14 and 17 as identified by the Reference Evapotranspiration Zones issued by the California Irrigation Management Information System. (Please see attached map and UWS listing.)

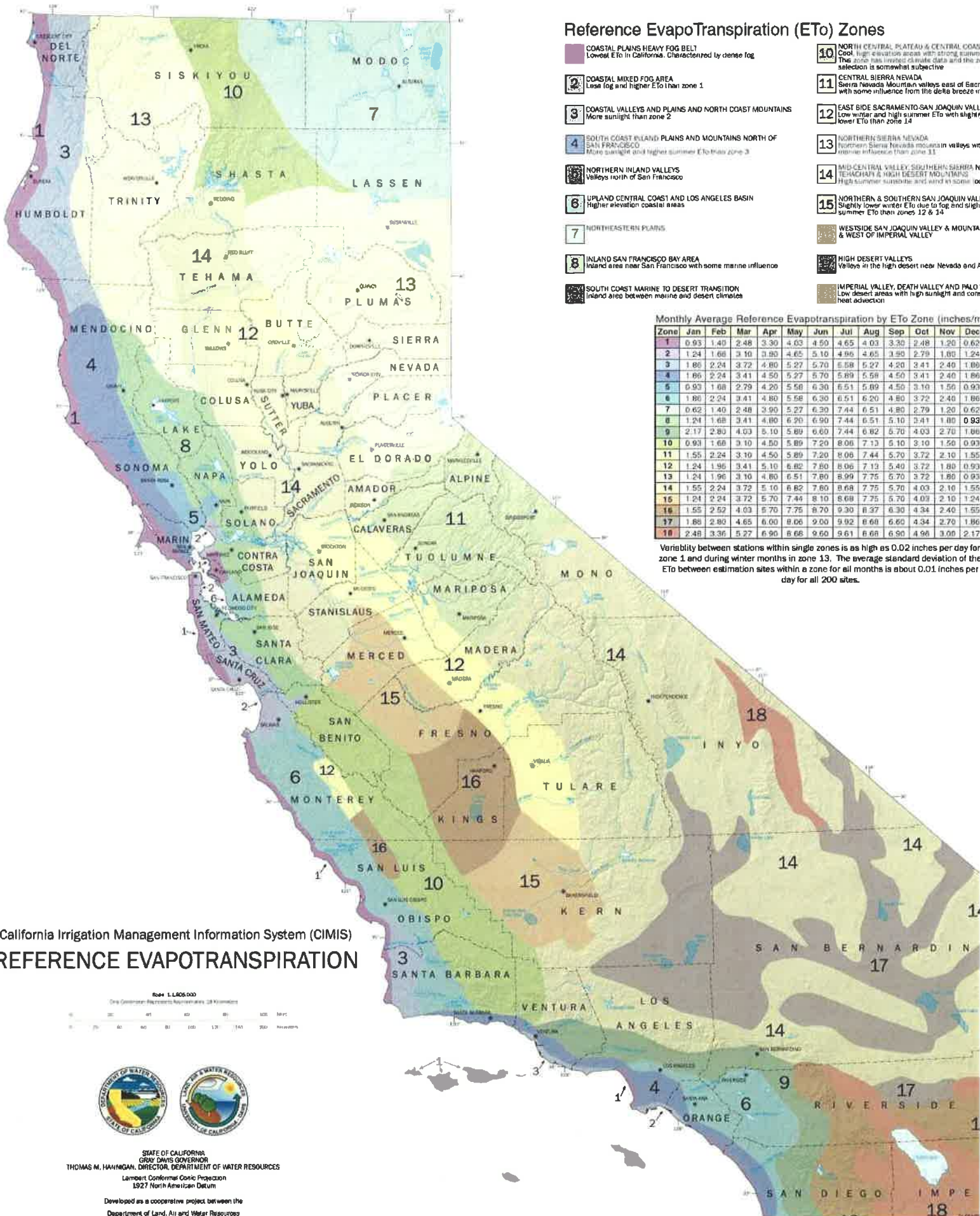
Thank you for your careful consideration of our request. We believe as a region we have demonstrated our commitment to water conservation. We look forward to our continued partnership with the State Water Resources Control Board in these efforts during these challenging times.

Sincerely,

A handwritten signature in black ink, appearing to be the initials 'KB' or 'Kirby Brill', written in a cursive style.

Kirby Brill, General Manager
Mojave Water Agency

Supplier Name	Total Monthly Potable Water Production	Production 2013	Units	Last Month	Percent Reduction	Goal	Shortfall	
Adelanto City of	733449540	823507000 G		15.40%	10.94%	20.00%	9.06%	
Apple Valley Ranchos Water Company	2271961	3246455 CCF		31.72%	30.02%	28.00%	-2.02%	0.00% 10% or more from goal
Golden State Water Company Barstow	2957	3883.2 AF		24.72%	23.85%	24.00%	0.15%	0.00% Within 10% of goal
Hesperia Water District City of	7120	9187 AF		23.39%	22.50%	32.00%	9.50%	0.00% Reached their goal
Hi-Desert Water District	1316.96	1438 AF		9.07%	8.42%	16.00%	7.58%	
Joshua Basin Water District	730.885	958.752 AF		26.92%	23.77%	28.00%	4.23%	
Phelan Pinon Hills Community Services District	1523.63	1829.03 AF		17.23%	16.70%	32.00%	15.30%	
San Bernardino County Service Area 64	1345.06	2014.85 AF		34.52%	33.24%	32.00%	-1.24%	
San Bernardino County Service Area 70	837.8	1134.28 AF		27.27%	26.14%	28.00%	1.86%	
Victorville Water District	10398.29	14088 AF		27.30%	26.19%	28.00%	1.81%	



Reference Evapotranspiration (ET₀) Zones

- 1** COASTAL PLAINS HEAVY FOG BELT
Lowest ET₀ in California. Characterized by dense fog
- 2** COASTAL MIXED FOG AREA
Less fog and higher ET₀ than zone 1
- 3** COASTAL VALLEYS AND PLAINS AND NORTH COAST MOUNTAINS
More sunlight than zone 2
- 4** SOUTH COAST INLAND PLAINS AND MOUNTAINS NORTH OF SAN FRANCISCO
More sunlight and higher summer ET₀ than zone 3
- 5** NORTHERN INLAND VALLEYS
Valleys north of San Francisco
- 6** UPLAND CENTRAL COAST AND LOS ANGELES BASIN
Higher elevation coastal areas
- 7** NORTHEASTERN PLAINS
- 8** INLAND SAN FRANCISCO BAY AREA
Inland area near San Francisco with some marine influence
- 9** SOUTH COAST MARINE TO DESERT TRANSITION
Inland area between marine and desert climates
- 10** NORTH CENTRAL PLATEAU & CENTRAL COAST
Cool, high elevation areas with strong summer. The zone has limited climate data and this selection is somewhat subjective
- 11** CENTRAL SIERRA NEVADA
Sierra Nevada Mountain valleys east of Sacramento with some influence from the desert breeze
- 12** EAST SIDE SACRAMENTO-SAN JOAQUIN VALLEY
Low winter and high summer ET₀ with slightly lower ET₀ than zone 14
- 13** NORTHERN SIERRA NEVADA
Northern Sierra Nevada mountain valleys with more influence than zone 11
- 14** MID-CENTRAL VALLEY SOUTHERN SIERRA NEVADA
High summer sunshine and wind in some locations
- 15** NORTHERN & SOUTHERN SAN JOAQUIN VALLEY
Slightly lower winter ET₀ due to fog and slightly lower ET₀ than zones 12 & 14
- 16** WESTSIDE SAN JOAQUIN VALLEY & MOUNTAIN & WEST OF IMPERIAL VALLEY
- 17** HIGH DESERT VALLEYS
Valleys in the high desert near Nevada and Arizona
- 18** IMPERIAL VALLEY, DEATH VALLEY AND PALM SPRINGS
Low desert areas with high sunlight and core heat advection

Monthly Average Reference Evapotranspiration by ET₀ Zone (inches/ft)

Zone	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	0.93	1.40	2.48	3.30	4.03	4.50	4.65	4.03	3.30	2.48	1.40	0.93
2	1.24	1.68	3.10	3.80	4.65	5.10	4.96	4.65	3.80	2.79	1.68	1.24
3	1.88	2.24	3.72	4.80	5.27	5.70	5.58	5.27	4.20	3.41	2.40	1.88
4	1.88	2.24	3.41	4.50	5.27	5.70	5.69	5.58	4.50	3.41	2.40	1.88
5	0.93	1.08	2.29	4.20	5.00	6.30	6.51	6.09	4.50	3.10	1.50	0.93
6	1.88	2.24	3.41	4.80	5.58	6.30	6.51	6.20	4.80	3.72	2.40	1.88
7	0.62	1.40	2.48	3.90	5.27	6.30	7.44	6.51	4.80	2.79	1.20	0.62
8	1.24	1.68	3.41	4.80	6.20	6.90	7.44	6.51	5.10	3.41	1.80	0.93
9	2.17	2.80	4.03	5.10	5.80	6.60	7.44	6.82	5.70	4.03	2.70	1.88
10	0.93	1.60	3.10	4.50	5.89	7.20	8.06	7.13	5.10	3.10	1.50	0.93
11	1.55	2.24	3.10	4.50	5.89	7.20	8.06	7.44	5.70	3.72	2.10	1.55
12	1.24	1.96	3.41	5.10	6.82	7.80	8.06	7.13	5.40	3.72	1.80	0.93
13	1.24	1.96	3.10	4.80	6.51	7.80	8.09	7.75	5.70	3.72	1.80	0.93
14	1.55	2.24	3.72	5.10	6.82	7.80	8.68	7.75	5.70	4.03	2.10	1.55
15	1.24	2.24	3.72	5.70	7.44	8.10	8.68	7.75	5.70	4.03	2.10	1.24
16	1.55	2.52	4.03	6.70	7.75	8.70	9.30	8.37	6.30	4.34	2.40	1.55
17	1.88	2.80	4.65	6.00	8.06	9.00	9.92	8.68	6.60	4.34	2.70	1.88
18	2.48	3.36	5.27	6.90	8.68	9.60	9.61	8.68	6.90	4.96	3.00	2.17

Variability between stations within single zones is as high as 0.02 inches per day for zone 1 and during winter months in zone 13. The average standard deviation of the ET₀ between estimation sites within a zone for all months is about 0.01 inches per day for all 200 sites.

California Irrigation Management Information System (CIMIS)
REFERENCE EVAPOTRANSPIRATION



STATE OF CALIFORNIA
GRAY DAVIS GOVERNOR
THOMAS M. HANNIGAN, DIRECTOR, DEPARTMENT OF WATER RESOURCES
Lambert Conformal Conic Projection
1927 North American Datum
Developed as a cooperative project between the
Department of Land, Air and Water Resources