LBOps ICS Exhibit U

Mohave Valley Irrigation and Drainage District (MVIDD) Extraordinary Conservation Intentionally Created Surplus (EC-ICS)

Land Fallowing Program

ICS Category: 2.1 A - Extraordinary Conservation EC-ICS - Fallowing of land.

Project Description: Mohave Valley Irrigation and Drainage District (MVIDD) is an irrigation district formed under Title 48, Ch. 19, Arizona Revised Statutes. MVIDD holds a contract with the United States Bureau of Reclamation (USBR) issued under Section 5 of the Boulder Canyon Project Act of 1928, (USBR Contract No. 14-06-W-204) in the amount of 41,000 acre feet annually, and also holds a supplemental contract for use of Colorado River water through the Mohave County Water Authority (Contract No. 09-101) in the amount of 1,250 acre feet annually. MVIDD's exterior boundaries include lands that are part of the Fort Mohave Indian Reservation. MVIDD does not deliver water to those lands. All references to MVIDD and MVIDD water use described here are solely for non-Indian lands within MVIDD.

This project will conserve water by reducing the consumptive use of Colorado River water within MVIDD by fallowing MVIDD agricultural lands with a recent history of irrigation. The program is intended to coordinate with the State of Arizona's Drought Contingency Planning program (DCP).

Annual ICS Creation Amount: The program will yield up to 10,000 acre-feet of EC-ICS.

Administration: MVIDD will undertake to administer the program at the local level, including preparation of necessary enrollment documents, scheduling of annual participation quantities, verification of compliance, impact mitigation, and overall reporting to USBR.

MVIDD will obtain necessary permission to lock out any gates for participating fields as needed. In the case of shared gates, a physical obstruction will separate the fallowed fields and prevent delivery of water.

Enrollment: The fallowing program participants will consist of owners of agricultural land within MVIDD. An enrollment process will be created whereby participating farmers will voluntarily agree to limit or alter the planting of crops on land that has been verified as actively cultivated (or enrolled and fallowed} in the last 3 of the last 5 years. To make participation equitably available, the minimum number of acres will be 10 acres.

Quantification Methodology: Conserved water yield for fallowed fields will be based on a study of consumptive use of crops planted on the agricultural lands enrolled in the program

averaged over the last five year's water use and crop history. Consumptive use (CU) reduction for the parcels designated to be fallowed will be computed in acre-feet per acre, then multiplied by the number of acres fallowed. Crop CU (crop evapotranspiration) for each of the previous five years will be determined using reference crop evapotranspiration computed using operational weather data collected at Arizona Meteorological Network (AZMET) electronic weather stations located in the Mohave Valley area and crop coefficients from the Lower Colorado River Annual Summary (LCRAS). For parcels that have less than five years of cultivation, the CU reduction will be equal to the average CU from the highest 3 out of the 5 years.

Once identified, enrolled field locations will be assigned a consumptive use value for the upcoming year based on a rolling average of the actual crop CU for active fields and the calculated CU for fallowed fields as identified above. When fields are fallowed, the consumptive use value of the water not diverted shall be reported as conserved water.

MVIDD's Land Fallowing Program will enroll lands as participating in either Annual Rotational Fallowing or Seasonal/Crop Selection Fallowing, and will quantify the conserved water as follows:

- Annual Rotational Fallowing: Up to 50% of a farm's enrolled lands will be eligible for fallowing in any year. Selected acres will remain fallow for the entire year. The conserved water yield will be the difference between the selected acres' assigned consumptive use value and zero annual water use as a fallowed acre. Rules will be imposed to require rotation of planted crops among the enrolled acres at least every three years. Enrollment will remain open, allowing lands to enroll or de-enroll during the program.

- Seasonal/Crop Selection Fallowing: Up to 100% of a farm's enrolled lands will be eligible for fallowing, but for only a portion of the year. Agricultural land with a recent history of year-round irrigation will be fallowed for up to an eight-month period during the year. The selection of a crop with a shorter, and typically cooler, growing season yields conserved water. The conserved water yield will be the difference between the assigned consumptive use value associated with the crop(s) that required year-round irrigation (e.g. alfalfa) and the water that will be consumptively used growing crops that require partial year irrigation (e.g. winter wheat), using the same crop CU calculation methods identified above. Enrollment will remain open, allowing lands to enroll or de-enroll during the program.

All fields within MVIDD do not currently have flow-metered water delivery systems, but MVIDD is in the process of installing or requiring installation of meters on all points of diversion for each farm. That program should be completed in 2019 and those systems will be checked and verified by MVIDD during the year to ensure that water is not delivered to

any farm in excess of the water allocated to the non-fallowed portion of the farm. Installation of meters on the farm point of diversion shall be a prerequisite to any farm's entry into the MVIDD fallowing program.

MVIDD's consumptive use baseline will be calculated as the rolling average of the highest four (4) of the most recent five years, not including the immediately preceding year, but including the reduction in consumptive use attributable to the fallowed lands. The amount of EC-ICS that MVIDD may create in any year is limited to the amount of Colorado River water that, if added to its actual consumptive use, would not exceed the consumptive use baseline.

Verification Methodology: During the fallowing period, in order to ensure that any vegetation remaining on the fallowed lands does not consumptively use Colorado River water, and for dust control purposes, MVIDD shall, at its expense, ensure that any such vegetation is desiccated through application of herbicides or other means.

MVIDD staff will monitor fields throughout the year to verify water is not being used on fallowed lands. In addition to MVIDD verification, USBR may conduct an independent annual verification. MVIDD will also monitor total water use within each farm to ensure that remaining water use allocation for the enrolled but not fallowed lands has not been exceeded.

Limitations on the ICS Creation Amount: To provide assurance that water conserved by active fallowing of agricultural lands will result in a reduction of agricultural consumptive use within MVIDD, MVIDD will administer the following safeguards:

- During the term of the program, there shall be no net increase of agricultural water entitlements within MVIDD.
- Any land enrolled in the program will not be allowed to "overrun" any agricultural water entitlement remaining on the non-fallowed land.

Certification: MVIDD will submit an ICS Certification Report as required by Section XI.G.3.D.1 of the 2007 Colorado River Interim Guidelines, reporting the amount of ICS created under this Exhibit U and that the creation was consistent with an approved ICS Plan, this Exhibit U, and a Delivery Agreement. MVIDD acknowledges that, in accordance with Section 2.5.B of the Forbearance Agreement, the Secretary shall verify information in a Certification Report in consultation with the Lower Division States and provide a final written decision to the Parties.

Delivery: MVIDD shall enter into a separate delivery agreement for ICS consistent with Article XI.B of the 2007 Colorado River Interim Guidelines.