



BOARD OF SUPERVISORS

COUNTY OF HUMBOLDT

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April 14, 2015

Jessica Bean
State Water Resources Control Board
1001 1 Street
Sacramento, Ca. 95814
VIA Email: Jessica.bean@waterboards.ca.gov

Re: Comments in Response to the Governor's Statewide Mandatory Water Reduction Order

Dear Ms. Bean,

The Humboldt County Board of Supervisors submits these comments for the Governor's Statewide Water Reduction Order dated April 1, 2015.

We request that the State Water Resource Control Board strive to develop a reduced and more flexible regulatory approach that takes into consideration local supply/demand conditions. The majority of Humboldt County Municipal water agencies find themselves in a position during this statewide drought to have sufficient water supplies now and well into the future given a local source that has not been affected by the drought conditions. Please understand that we fully support efficient use of water and voluntary conservation practices at all times. However, imposing mandatory regulations and/or high water-use reductions do not provide any drought relief or benefit to our service territory.

Furthermore, Humboldt County is not connected to any other water delivery system that would benefit any other water district within the state. In fact, a 25% mandatory reduction would negatively impact our economy by reducing revenues to our incorporated cities and Community Service Districts.

Humboldt County supports the following policy principles advanced by the Association of California Water Agency:

1. Protect economic uses of potable water, while focusing efforts to substantially reduce water use for ornamental, lower-priority outdoor purposes;
2. Ensure fairness for communities statewide.

For the commercial, industrial and institutional (CII) sector, the regulations should clearly articulate a state policy to protect CII water use for economic or process-related uses. Local water suppliers should have discretion to implement CII water use reduction efforts to balance the need to reduce water use with the need to protect local economies. For example in Humboldt County, the CII sector includes several renewable power producers who would be harmed, and renewable power production reduced.

We suggest the Emergency Regulations include an “exception process” to allow water suppliers to present to the Water Board specific information and evidence supporting target adjustments to address extenuating circumstances or unreasonable local impacts.

Therefore, the Humboldt County Board of Supervisors asks that the State Water Resources Control Board introduce flexibility into the new emergency regulations to account for varying local water supply conditions.

Sincerely,



Estelle Fennell, Chair
Humboldt County Board of Supervisors

EF/td

cc: Assembly Member Woods
Senator McGuire