



HUMBOLDT BAY MUNICIPAL WATER DISTRICT

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April 22, 2015

Jessica Bean
State Water Resources Control Board

Via email: Jessica.bean@waterboards.ca.gov

RE: Draft Drought Emergency Water Conservation Regulations

Dear Ms. Bean,

The Humboldt Bay Municipal Water District (District) is a wholesale water supplier which serves approximately two-thirds of Humboldt County's population. The District supplies water to seven Municipalities, four of which are urban water suppliers (City of Arcata, City of Eureka, McKinleyville CSD, and Humboldt CSD). The District and the urban water suppliers whom we serve respectfully submit these comments on the draft Drought Emergency Water Conservation Regulations.

First of all, we wish to thank the State Water Resources Control Board (SWRCB) for introducing some flexibility into the regulations whereby suppliers who meet certain eligibility criteria may request to be placed into a lower conservation target. The SWRCB's Fact Sheet states that "these criteria relate to the source(s) of supply, precipitation amounts, and the number of years those supplies could last." We believe factors along those lines are reasonable to consider, especially the number of years a source of supply will last (even absent any recharge).

However, the draft regulations currently contain only one criterion: that the supplier's service area received average annual precipitation in 2014. This criterion alone does not adequately address the status of a water supply.

The District's water supply and that of the urban water suppliers we serve is Ruth Lake which is located in Trinity County approximately 80 miles from our service area. Ruth Lake has filled to capacity and spilled each and every year of this four-year unprecedented drought, as it has in prior droughts too. Ruth Lake has filled to capacity four times this season (in December, February, March and again in April), despite precipitation in our service area that is slightly below average.

We offer the following perspectives regarding the ability of Ruth Lake to reliably meet our service area's current demand for all sectors (municipal, commercial, industrial, institutional and agricultural):

- 1) Ruth Lake can supply the total demand in our service area for 3 years without any recharge; and
- 2) if we experienced 1976-77 drought conditions year-after-year-after-year, we could supply approximately twice our current demand indefinitely.

Therefore, we respectfully request that the regulations be amended to include a different criterion to consider a lower conservation tier. Our recommended change is as follows:

Each urban water supplier whose source of supply does not include groundwater or water imported from outside the hydrological region, and is sufficient to meet all demands for three years with no additional recharge~~that received average precipitation in 2014~~ may, notwithstanding its average July – September 2014 R-GPCD, submit for Executive Director approval, a request to reduce its total water usage by 4% for each month as compared to the amount used in the same month in 2013. Any such request shall be accompanied by information showing that the supplier's sources of supply do not include any groundwater or water imported from outside the hydrological region and that the supplier's source of supply is adequate for three years without additional recharge,~~service area received average annual precipitation in 2014.~~

We would be happy to discuss this request with you. You may contact me at (707) 443-5018, or David Aladjem, Downey Brand at (916) 520-5361, who knows our situation well.

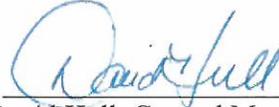
We wish to thank the SWRCB and staff who are working hard to address this challenging matter.

-- signature page follows --

Sincerely,



Carol Rische, General Manager
Humboldt Bay Municipal Water District



David Hull, General Manager
Humboldt Community Services District



Greg Orsini, General Manager
McKinleyville Community Services District



Erik Lust, Water/Wastewater Superintendent
City of Arcata



Brian Gerving, Public Works Director
City of Eureka



cc: Senator Mike McGuire
Assemblymember Jim Wood
Zuey Goosby & John Woolley, Local Legislative Representatives
Wholesale Municipal Customers
Greater Eureka Chamber of Commerce
Dorie Lannie, Humboldt County Drought Task Force
Tim Quinn & David Bolland, ACWA
David Aladjem

