

**BIG ROCK
COMMUNITY SERVICES DISTRICT**

P.O. Box 453
Crescent City, CA 95531
(707) 464-7769



January 28, 2016

Ms. Felicia Marcus
Chairwoman
State Water Resources Control Board
1001 "I" Street
Sacramento, CA 95814

Dear Chairwoman Marcus:

The Big Rock CSD, providing municipal governance services to the Township of Hiouchi in Del Norte County, hereby offers the following comments concerning the Proposed Drought Emergency Conservation Regulations, dated January 15, 2016.

We are pleased that you extended to us and other drinking water agencies the opportunity to make input to you and SWRCB staff regarding these regulations during this short public comment period. While the changes proposed in the December 7, 2015 workshop acknowledged the fact that climate conditions are dissimilar throughout California, the proposed adjustments to state-level regulations do not even closely approach the reality of hydrologic conditions in Del Norte County.

Governor Brown's Executive Order B-36-15 specified that, if drought conditions persist through January 2016, the SWRCB shall continue a regulatory program to promote urban water conservation. It is important to acknowledge at this point that drought conditions obviously do not exist in Del Norte County. They in fact are not present anywhere along the full length of the Smith River. With its three major forks and numerous tributaries, this pristine riverine system on several occasions has flowed at or near flood stage for almost three months.

While this county was somewhat dry last summer, it has been blessed with abundant rainfall throughout the current winter season. The forecast is encouraging for all of 2016. As of today, the total rainfall since October 1, 2015 in the Township of Gasquet amounts to approximately 90 inches of rain, with several more inches by tomorrow night. The Big Flat area experienced over 80 inches during the same period, and the Township of Hiouchi recorded 76 inches thus far with 8 more due by Saturday. Annual normal rainfall here is 68 inches. Depending upon the reporting measurement source, the Crescent City area is now reporting around 70 inches. In fairness, Governor Brown's cumulative actions to effectively deal with the widespread water shortages in this state should not apply to Del Norte County.

We request that the emergency conservation regulations be modified to require reductions in potable water production from only those water supplies in which drought conditions persist.

Again, we sincerely appreciate the opportunity to provide these comments. We always enjoy working with your staff, especially Tony Wiedemann and Franklin Saylor out of your Redding office. We wish you success as statewide drought conditions are addressed for 2016.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Bradford', written in a cursive style.

Craig Bradford, President
Board of Directors