

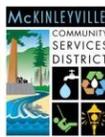
HUMBOLDT BAY MUNICIPAL WATER DISTRICT

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January 27, 2016



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

Dear Chairwoman Marcus:

The Humboldt Bay Municipal Water District (HBMWD) and its water supply partners in the Humboldt Bay area would like to offer the following comments on the Proposed Drought Emergency Conservation Regulations, dated January 15, 2016.

We appreciate the opportunities that we and other water agencies have had to provide input to staff and Board members on these regulations, including this current comment period, the December 7, 2015 workshop, the comment period for the proposed regulatory framework and the various direct meetings that have taken place. We greatly appreciate the changes that are proposed to the regulations adopted in 2015, to allow for reductions in conservation requirements. The proposed changes reflect a recognition of the fact that climate conditions and irrigation needs vary in California, that population growth and concomitant increases in water demand continue to occur, and that water agencies have made investments in drought-resilient water supplies. Given the uncertainty of the final amounts of precipitation, snowpack and runoff in the Sierra Nevada during water year 2015-16 and the current lower-than-average storage levels in reservoirs in the Sacramento and San Joaquin Valleys, we also appreciate the reference in the fact sheet for these proposed regulations to making adjustments to the regulations to reflect hydrologic conditions in April.

Regulations Should Apply Only Where Drought Persists

Governor Brown's Executive Order B-36-15 specified that if drought conditions persist through January, the State Water Resources Control Board shall continue a regulatory program to promote urban water conservation. Drought conditions do not currently exist for HBMWD and its municipal water supply partners (the Cities of Arcata, Blue Lake and Eureka and the following Community Services Districts: Fieldbrook-Glendale, Humboldt, Manila and McKinleyville). Ruth Reservoir, the source of supply for HBMWD and its

partners, filled on December 21 and has been overflowing since. Ruth Reservoir also filled and overflowed four times in water year 2014-15. Precipitation in the Mad River watershed is currently over 150% of average. As the attached hydrographs show, the Mad River flooded on January 17, and is projected to approach monitor stage on January 29.

Because of the lack of drought conditions in the Mad River, HBMWD and its partners anticipate being able to make full beneficial use of their municipal water supplies, while continuing to meet all environmental protection requirements and thus also avoiding the waste and unreasonable use of any water resources.

Reference is made in the "Evidence of Emergency" section of the Emergency Regulations Digest to the U.S. Drought Monitor data from January 12, 2016. On that date, the Drought Monitor showed the northwest region of California (in which the Mad River watershed is located) to be a mix of abnormally dry to moderate drought conditions. However, the Drought Monitor also displays the warning that it displays broad scale conditions, and that local conditions may vary. As noted, conditions on the Mad River vary from this drought designation, and indeed, all of Humboldt County does, given the cancellation of Humboldt County's drought emergency declaration that is planned to be adopted by the Board of Supervisors on February 2, 2016.

Drought conditions also no longer exist for municipal water supplies on the Smith River in Del Norte County nor for those on the Eel River in Humboldt County. Both of these rivers have flooded during the past two months. Additionally, drought conditions no longer exist on the Russian River in Sonoma and Mendocino Counties, and on Walker Creek, Nicasio Creek, Lagunitas Creek and Novato Creek in Marin County. Reservoirs supplied by these rivers and creeks are nearly full, and precipitation is running above average.

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.

Thank you again for the opportunity to provide these comments. We look forward to working with your staff, the rest of the Board and you to address any drought conditions in California in 2016.

Sincerely,



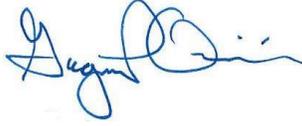
Paul Helliker, General Manager
Humboldt Bay Municipal Water District





David Hull, General Manager
Humboldt Community Services District

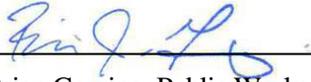




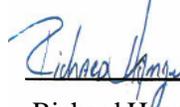
Greg Orsini, General Manager
McKinleyville Community Services District



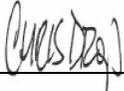
Mark Andre, Director of Environmental Services
City of Arcata



Brian Gerving, Public Works Director
City of Eureka



Richard Hanger, General Manager
Fieldbrook Glendale Community Services District



Christopher Drop, General Manager
Manila Community Services District



MAD RIVER - ARCATA (ARCC1)

Latitude: 40.91° N Longitude: 124.06° W

Elevation: 13 Feet

Location: Humboldt County in California

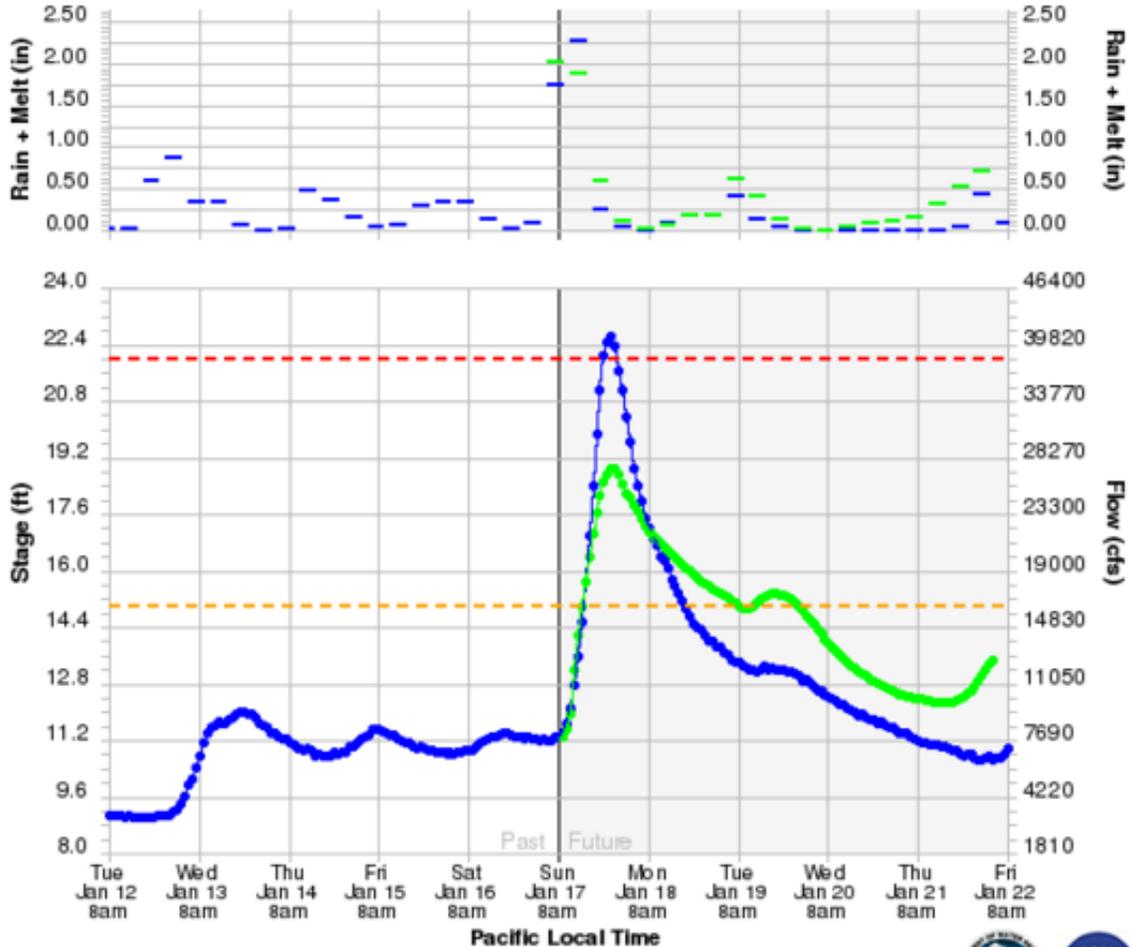
River Group: North Coast

Forecast — Observed —

Previous Forecast	Next Forecast
Saturday 01/16/2016 18-00 UTC	Sunday 01/17/2016 18-00 UTC
Selected Date: Sunday 01/17/2016 12-18 UTC	

ARCC1 - MAD - ARCATA, NR (MS: 15.0 / FS: 22.0)

Forecast Issuance: January 17, 2016 at 08:18 AM PST



Observed ● Forecast ● Monitor — Flood —
 FCTime: 1618Z ID: ARCC1
 Created: 01/23/2016 at 1:00 AM PST (Source = C) NOAA / NWS / California Nevada River Forecast Center



MAD RIVER - ARCATA (ARCC1)

Latitude: 40.91° N Longitude: 124.06° W
 Location: Humboldt County in California

Elevation: 13 Feet
 River Group: North Coast

Issuance Time: Jan 26 2016 at 8:02 AM PST

Next Issuance: Jan 26 2016 at 3:00 PM PST

Monitor Stage: 15.0 Feet

Flood Stage: 22.0 Feet

