



## City of Yreka

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April 14, 2016



Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
Sacramento California 95814

Re: Comments on Urban Water Conservation: Modification of Emergency Regulation for Statewide Urban Water Conservation

The City of Yreka would like to offer the following comments on the consideration of changes to the Emergency Regulation for Statewide Urban Water Conservation.

The City of Yreka is a relatively small water agency, just slightly exceeding the 3,000 water connection threshold. The City is located just 22 miles south of the Oregon border and is in a watershed separated from other watersheds in Northern California that transfer water south for agricultural and urban uses.

The City's water source is a combination of Fall and Spring Creeks which originate from artesian springs from the volcanic aquifer in Southern Oregon. Historical USGS records indicate that the aquifer maintains a minimum flow since the early part of the last century sufficient to serve our water right. The water is piped through a 23 mile pipeline to the City. This source of water has not diminished due to climatic conditions. This region is hydrologically separated from other areas of the state and conserving water does not have any effect on drought impacted areas.

The Board's regulations recognize man-made reservoirs above ground with sufficient supplies that can be measured as a reason for lowering conservation targets, but ignore significantly greater supplies in stable aquifers. The City believes that the Board should allow for a lessening of the conservation requirements for proven aquifers not impacted by drought conditions.

The severe drought that has afflicted much of California has had variable impacts on different parts of the state. The U.S. Drought monitor as maintained by the U.S. Weather Service shows our area as in the second lowest drought category as of April 12, the lowest being no drought conditions (which applies immediately to our west). The map is attached.

The Weather Service's forecast page for April shows that it is likely that the drought designation will be removed during the current period. See the attached map

Therefore, while other parts of the State may still be in on-going drought conditions, our part of the state is not. In addition, the water that would be saved by conservation will not accrue to the benefit of other portions of the state that could use the water for relief of their conditions. Any water conserved by Yreka would flow to the Pacific Ocean down the Klamath River. At the final discharge of the Klamath,

the maximum water that could be used by Yreka would amount to five one-hundredths of one percent of the average discharge (15cfs/30800cfs). The amount that could be conserved would be a fraction of that amount.

The City urges the Board to consider the different conditions in the state when deciding whether to continue the Emergency Regulations. Specifically the City urges the state to:

1. Exempt from the Emergency Regulations areas which are no longer in drought conditions, particularly those areas whose watersheds do not and cannot help provide relief to areas in which the drought conditions may still persist.
2. If a full exemption is not granted, establish a process where staff can administratively lower significantly water conservation targets based on local conditions that include stable underground aquifers, relative drought conditions, and stable sources of water.

We have been hoping for increased precipitation to ease drought conditions and that precipitation has occurred. From my office window I can see snow from last night on the hills above town. Please take into account the local conditions in deciding what parts of the Emergency Regulation to extend.

Thank you for your consideration.

Sincerely,



Steven W. Baker  
City Manager

Attachments:

U.S. Drought Monitor – California –April 12, 2016

- <http://droughtmonitor.unl.edu/Home/StateDroughtMonitor.aspx?CA>

U.S. Monthly Drought Outlook – March 31, 2016 -Valid for April 2016

- [http://www.cpc.ncep.noaa.gov/products/expert\\_assessment/month\\_drought.png](http://www.cpc.ncep.noaa.gov/products/expert_assessment/month_drought.png).



# U.S. Drought Monitor California

**April 12, 2016**

*(Released Thursday, Apr. 14, 2016)*

Valid 8 a.m. EDT

Drought Conditions (Percent Area)

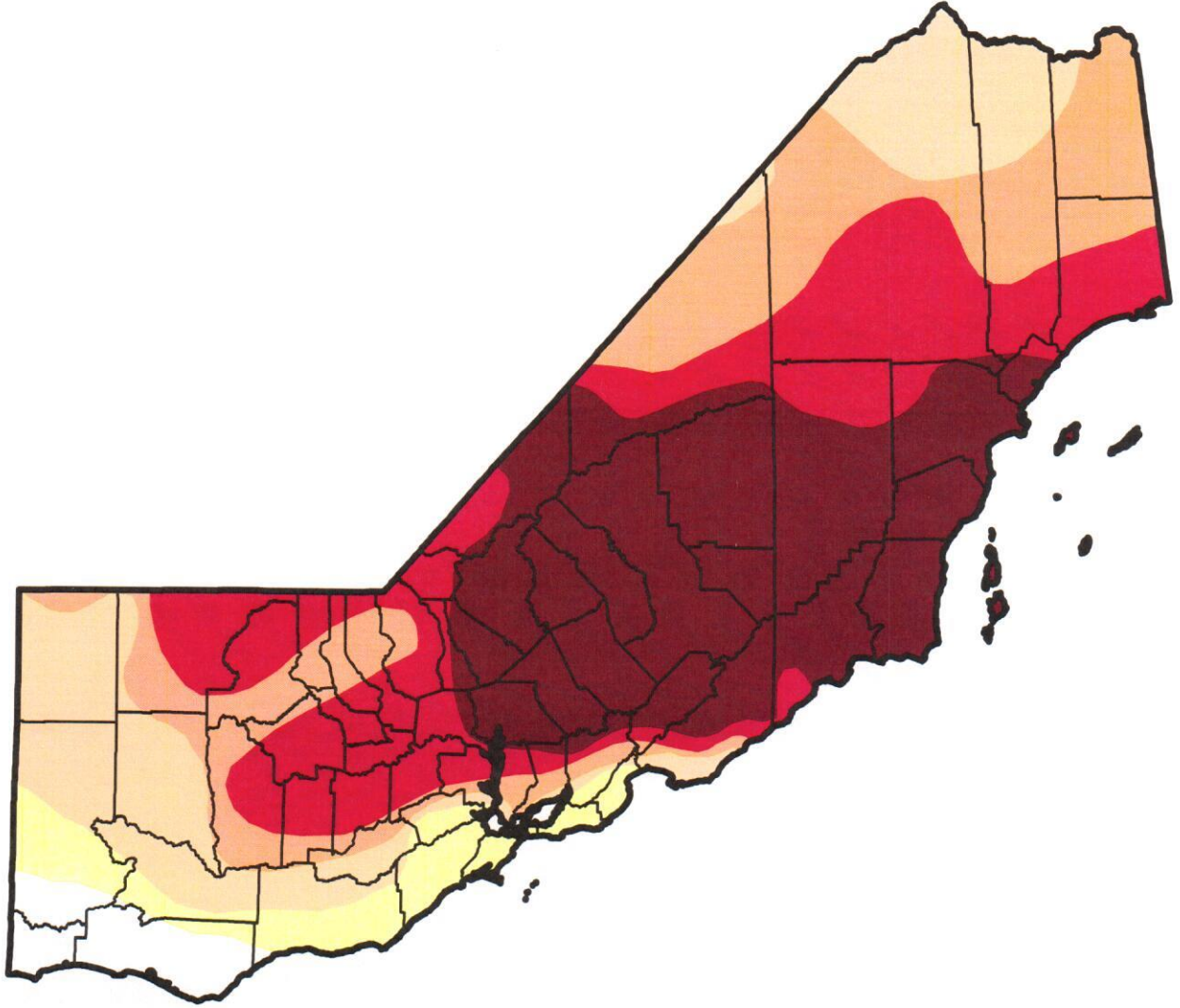
	None	D0-D4	D1-D4	D2-D4	D3-D4	D4
<b>Current</b>	3.55	96.45	90.58	74.37	55.25	31.68
<b>Last Week</b> <i>4/5/2016</i>	3.55	96.45	90.58	74.37	55.25	31.68
<b>3 Months Ago</b> <i>1/12/2016</i>	0.00	100.00	97.33	87.55	69.07	42.66
<b>Start of Calendar Year</b> <i>12/29/2015</i>	0.00	100.00	97.33	87.55	69.07	44.84
<b>Start of Water Year</b> <i>9/29/2015</i>	0.14	99.86	97.33	92.36	71.08	46.00
<b>One Year Ago</b> <i>4/14/2015</i>	0.14	99.86	98.11	93.44	66.60	44.32

Intensity:

- D0 Abnormally Dry
- D1 Moderate Drought
- D2 Severe Drought
- D3 Extreme Drought
- D4 Exceptional Drought

*The Drought Monitor focuses on broad-scale conditions. Local conditions may vary. See accompanying text summary for forecast statements.*

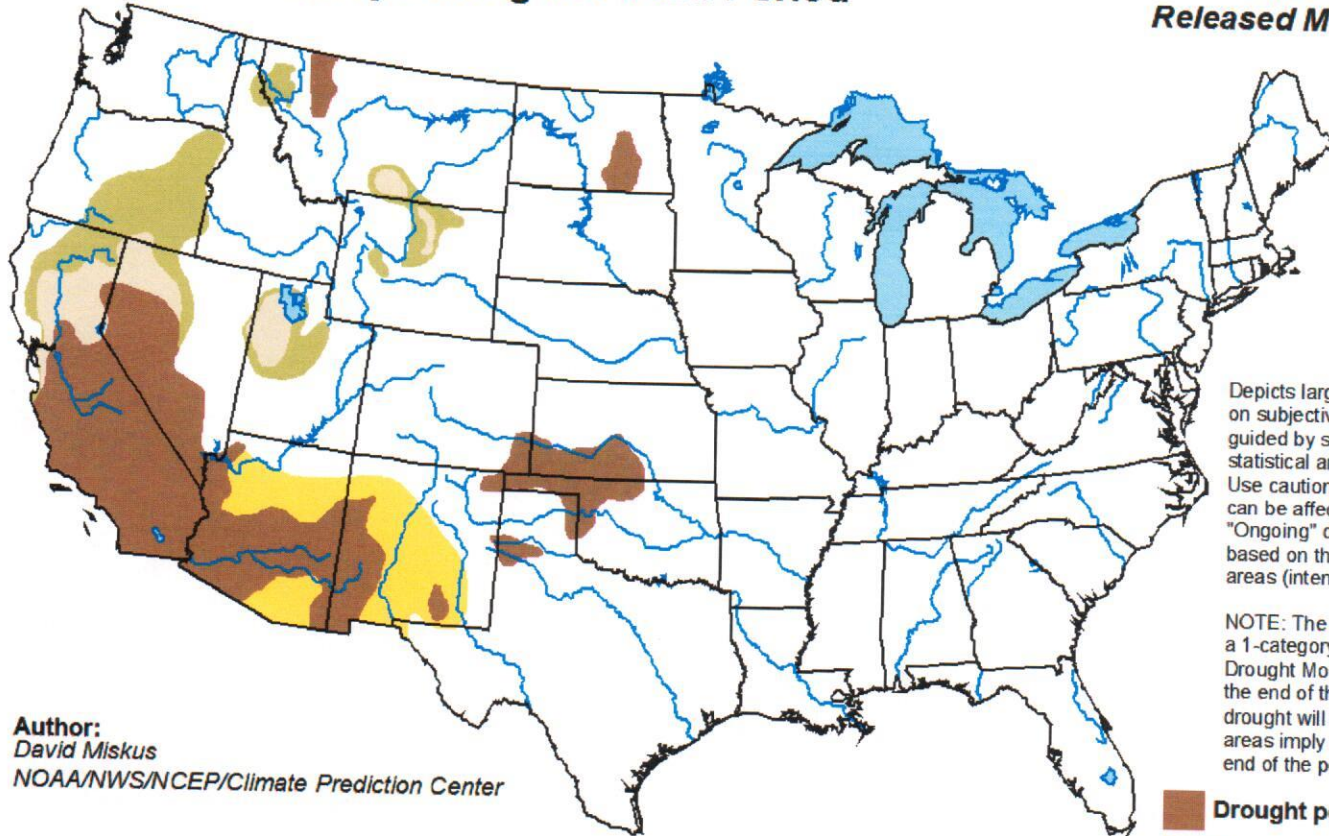
**Author:**  
Richard Tinker  
CPC/NOAA/NWS/NCEP



# U.S. Monthly Drought Outlook

## Drought Tendency During the Valid Period

Valid for April  
Released March 31,

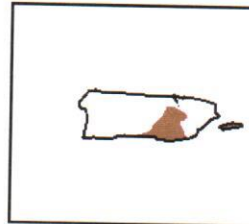
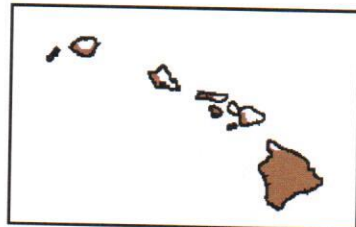


Depicts large-scale trend: on subjectively derived pr guided by short- and long statistical and dynamical l Use caution for applicatio can be affected by short l "Ongoing" drought areas based on the U.S. Drought areas (intensities of D1 to

NOTE: The tan areas imp a 1-category improvemen Drought Monitor intensity the end of the period, alth drought will remain. The g areas imply drought remo end of the period (D0 or r

**Author:**  
David Miskus  
NOAA/NWS/NCEP/Climate Prediction Center

- Drought persists
- Drought remains but
- Drought removal like
- Drought developer



<http://go.usa.gov/3>