

Comment Letters

From: Mark Andre [mailto:mandre@cityofarcata.org]
Sent: Wednesday, January 06, 2016 11:51 AM
To: Frevert, Kathy@Waterboards
Cc: rhernandez@cityofarcata.org; Erik Lust; Karen Diemer
Subject: City of Arcata Comment on the proposed regulatory framework for extending the statewide 25% water reduction mandate

To: Kathy.Frevert@waterboards.ca.gov

Dear Ms. Frevert,

Thank you for the opportunity to provide comments on the proposed regulatory framework for extending the statewide 25% water reduction mandate.

The City of Arcata has a very robust and resilient water supply. A press release issued on December 22, 2015 by the City's water supplier, the Humboldt Bay Municipal Water District (HBMWD) reported that their source, Ruth Lake, is at 100% capacity. Furthermore, the City of Arcata already has an exceptionally low per capita water usage. The average per capita use in 2015 (January – November) was lower (48 R-GPCD) than the average per capita use in 2013 (52 R-GPCD). Arcata's Peak Rate Allocation from HBMWD is 3.25 MGD and our daily average water use is 1.711 MG (based on 2015 production). Preliminary analysis of the data also shows that Arcata per capita water use is already below the SBX7-7 2020 goal of 110 GPCD (using UWMP R-GPCD calculation method, Arcata's average use in 2015) has been 94 GPCD).

Given our reliable water source from the Mad River watershed via the Humboldt Bay Municipal Water District/ Ruth Lake, we prefer that the extension of the statewide 25% water reduction mandate not include the City of Arcata.

If the emergency drought conservation requirements are indeed extended into 2016, we recommend that conservation targets consider base year adjustment factors that consider a local jurisdiction's economic activity and population increases for the total water usage. Arcata is a small community that has a very low per capita water use but we are experiencing an increase in enrollment at Humboldt State University as well as several new manufacturing businesses in town. Cal Recycle uses a methodology that factors in economic activity and population increases to determine base year waste reduction rates. The Water Board should consider a similar methodology.

Thank you for your consideration.

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