



HUMBOLDT BAY MUNICIPAL WATER DISTRICT

828 SEVENTH STREET, PO Box 95 • EUREKA, CALIFORNIA 95502-0095

OFFICE 707-443-5018 ESSEX 707-822-2918

FAX 707-443-5731 707-822-8245

EMAIL OFFICE@HBMWD.COM

Website: www.hbmwd.com

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Public Comment
Urban Water Conservation Workshop
Deadline: 1/12/17 12 noon

January 11, 2017



Ms. Jeanine Townsend
Clerk of the Board
State Water Resources Control Board
1001 I St., 24th Floor
Sacramento, CA 95814

Comment Letter – Urban Water Conservation Workshop

Dear Ms. Townsend:

Executive Order B-37-16, adopted on May 9, 2016, included assertions that drought conditions persisted, and that such conditions could persist into 2017. Those were the findings on which the May 18, 2016 emergency conservation regulations were based. However, those conditions no longer persist.

The Executive Order directs the State Water Resources Control Board to develop a proposal for extending the emergency conservation regulations, to “prepare for the possibility of another dry winter.” However, as noted below, the winter of 2016-17 is not dry – it is the wettest on record so far. Consequently, there is no rationale for extending the emergency conservation regulations, due to the fact that there is no longer a drought emergency. The current regulations should expire and no emergency regulations need succeed them.

Water Year 2016-17 is the wettest on record for all three basins in the Central Valley, which are the primary source of water supplies in California. In the Sacramento Valley, San Joaquin Basin and Tulare Basin, precipitation levels are 203%, 199% and 190% of average, respectively. In fact, in these three basins, precipitation levels have already reached 84%, 75% and 68% of the annual average precipitation, and we are only 44% into the three typically wettest months of the winter.

Precipitation levels around the state are all above average. Since the beginning of the water year on October 1, rainfall in Eureka has been 169% of normal and 173% of normal in Redding. In San Francisco, Sacramento and Monterey, precipitation is 166%, 220% and 155% of normal, respectively. In Fresno and Bakersfield, it is 172% and 170%, respectively. In Santa Barbara, Los Angeles and San Diego, the figures are 117%, 144% and 139%, respectively.

Snowpack is also robust this year. As of January 11, 2017, statewide snowpack is 158% of normal, and 63% of the April 1 average. Again, this is at a time when we are only 27% into the snowpack measurement period of December 1 through April 1.

As reported on the Daily Reservoir Summary on the California Data Exchange Center, storage as of January 10, 2017 in selected reservoirs around the state was 17.35 million acre-feet, which is 110% of the average storage level of 15.79 million acre-feet on that date. Last year on that date, storage was 7.89 million acre-feet.

As reported in the stress test results in 2016, over 80% of California's urban water agencies calculated that they had enough supply to meet demand in 2019, even were there to be three additional dry years similar to 2013-15. Precipitation levels have now exceeded even the wettest of those years, so there is no possibility that water supplies would be inadequate to meet demand in 2017. For this reason, and for all of the reasons stated above, there is no longer a drought emergency, nor any need for emergency conservation regulations for urban water supply.

Sincerely,



Paul Helliker
General Manager