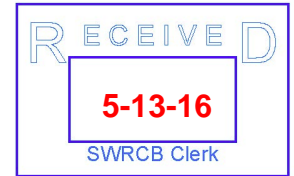


**DEL NORTE  
WATER RESOURCES NETWORK**

2680 U.S. Highway 199  
Crescent City, CA 95531-9309  
(707) 458-9933



May 13, 2016

Ms. Felicia Marcus, Chairman  
Attn: Members of the Board  
*State Water Resources Control Board*  
1001 "I" Street  
Sacramento, CA 95814

Dear Chairman Marcus and Members of the Board:

Since January of 2016, the DNWRN was created to give urban and non-urban water suppliers the ability to stay abreast of SWRCB-related developments as they began to unfold in rapid succession, and then to facilitate collaboration among the Network's members to address them productively. The DNWRN's membership includes all community services districts (CSDs) in Del Norte County (except for the *Klamath CSD*), the *City of Crescent City*, and the *Del Norte County Farm Bureau*. On our behalf and over the recent past, the Del Norte County Board of Supervisors has communicated with you regarding the SWRCB's emergency drought regulations that concern us the most. We have joined hands along the way with our counterparts in Humboldt County and others farther south on California's North Coast. It has been encouraging throughout this process to discover that all water suppliers in this region seem to be on pretty much the same page with respect to concerns relating to emergency drought regulations and already legislated bills, such as SB-88. SWRCB Staff, Senator McGuire, and Assemblyman Jim Wood generously have invited us to discuss our respective water conditions via face-to-face meetings in Sacramento, telephone conferencing, data production, and written correspondence. We are most appreciative of the time and energy all participants have committed to this process to ensure that fairness is achieved throughout the North Coast.

Our point since the first of Governor Brown's three emergency orders is that Del Norte County is not experiencing a drought. Indeed, no drought has existed here in memory. We are different from the rest of the state. Among the obviously abundant groundwater supplies, steadily flowing surface water resources, and

alternately heavy rainfall, only a small portion of the available water supply is used by humans. Said another way and whether or not we receive significant precipitation, the county's total water supply remains relatively constant. Since last October, all of the 5 townships here have received over 100 inches of rain. Such is why we find it unacceptable to have to endure the same water conservation mandates that are most applicable to locations in southern California. Such simply doesn't make sense to us.

On your solicited question of whether or not a "conservation floor" should exist in Del Norte County, we strongly oppose the thought. Our understanding has been that the newly proposed regulations "only require emergency conservation measures where they may be warranted." We have been consistent in declaring to SWRCB Staff that all members of the DNWRN typically apply "Best Management Practices" that are recommended by the *American Water Works Association* and the *Rural Community Assistance Corporation*. The distributed water in Crescent City and populated townships is metered and billed to consumers, not wasted. All DNWRN members aggressively attend to finding and repairing leaks within our jurisdictions. Nothing further is "warranted."

Please accept our highest compliments for your past willingness to hear and accommodate our pleas for regulatory fairness. We only ask for special consideration when you craft new measures.

Very respectfully yours,

A handwritten signature in black ink, appearing to read "Craig Bradford". The signature is fluid and cursive, with a large initial "C" and "B".

Craig Bradford  
Chairman