

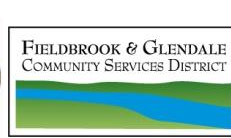
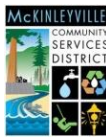
HUMBOLDT BAY MUNICIPAL WATER DISTRICT

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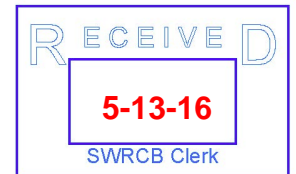
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May 13, 2016



Ms. Felicia Marcus, Chair, and Members of the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Dear Chair Marcus and Members of the Board:

The Humboldt Bay Municipal Water District (HBMWD) and municipal water supply agencies in the Humboldt Bay area would like to offer the following comments concerning Executive Order B-37-16 and the related proposed changes to the Drought Emergency Conservation Regulations.

We would like to thank you again for the opportunity to provide input in this continuing process to address hydrology and urban water supplies in California. We deeply appreciate your willingness to consider the voluminous information provided by us and by other stakeholders, and the modifications to the regulations that you are proposing to respond to our recommendations. The proposed revisions will allow the varied hydrology in different areas of the state to become the basis for decisions about whether or not emergency urban conservation measures are necessary to implement, over and above the ongoing programs that water agencies operate to improve water use efficiency and make their water supplies more resilient to droughts.

In the staff notice requesting comments on the proposed changes to the regulations, our position on a potential conservation “floor” was requested. We strongly oppose any such “floor,” as it would negate the whole approach proposed by the modifications in the regulations – namely, to only require emergency conservation measures where and when they may be warranted.

Both surface and groundwater supplies continue to be robust in our service area – our reservoir filled in December and continues to overflow, rainfall is currently 125% of normal in Eureka, and groundwater levels do not vary significantly from historical levels. We have been fortunate that our supplies have been more than adequate throughout the past four years to meet our customers’ needs, and we anticipate that we will easily meet the “stress test” of the proposed regulations, to be demonstrated in whatever manner the Board will request the information. Given the testimony and information provided by water agencies

throughout the state concerning the significant benefits that precipitation in water year 2015-16 has provided to urban water supplies, we anticipate that many of our sister agencies will also find themselves in similar circumstances.

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

Sincerely,



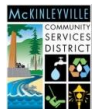
Paul Helliker, General Manager
Humboldt Bay Municipal Water District



David Hull, General Manager
Humboldt Community Services District



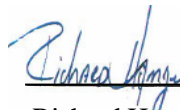
Greg Orsini, General Manager
McKinleyville Community Services District



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



Doug Culbert, CPO/Utilities Superintendent
City of Fortuna

