



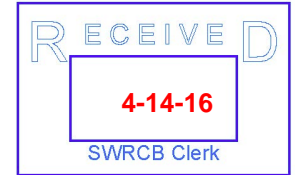
City of Crescent City
Where the Redwoods Meet the Sea

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April 14, 2016

Ms. Felicia Marcus
Chairwoman
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Dear Chairwoman Marcus:

The City of Crescent City, as an urban water supplier, would like to offer the following recommended changes to the Drought Emergency Conservation Regulations.

We appreciate the opportunity to provide input during this comment period and share similar concerns to other suppliers in the region, including Humboldt Bay Municipal Water District. Like them, Crescent City is located in a region that has experienced significant rainfall and now have water sources that are no longer in a drought condition. In fact, according to the most recent USDA Drought Map, dated April 12, 2016, all of Del Norte and Humboldt County is no longer in drought condition.

Crescent City's water supply is solely sourced from the Smith River. The Smith River has been at flood stage several times within the last three months. Current rainfall affecting the Smith River as reported by the California Data Exchange Center at the Gasquet Ranger Station is at 128% of normal through March 2016. Total rainfall accumulation since October 1, 2015 is over 100 inches.

During California's recent period of drought, water supplies within Del Norte County remained sustained. As stated in California Water Code 350, even in this "drought scenario", Crescent City's ordinary demands and requirements of water costumers could be satisfied without impacting the water supply.

As the notice for the April 20 workshop posed three questions, The City of Crescent City would like to submit the following comments:

1. What elements of the existing February 2016 Emergency Regulation, if any, should be modified and how so?

We recommend that Section 865(c)(2) of the regulations be replaced with the following:

(c)(2) Each urban water supplier whose sources of supply are adequate to meet normal demand shall be exempt from the requirements of Section 865 of these regulations. Each water supplier who is eligible for this exemption shall provide a statement to the Board by June 1, 2016 which provides data describing the normal potable water demand in its service area, and data describing the amount of supply available to the supplier to meet this demand.

2. How should the State Water Board account for regional differences in precipitation and lingering drought impacts, and what would be the methods of doing so?

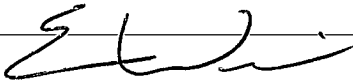
As stated in the above answer to question 1, the Board should rely on individual agencies, or groups of water agencies that share supplies from a watershed or reservoir, to identify their specific hydrologic conditions and the manner in which that hydrology defines the status of the supplies available to those agencies. The Board can rely on precipitation, runoff and reservoir storage data from the California Data Exchange Center and other sources to verify the information provided by water suppliers.

3. To what extent should the State Water Board consider the reliability of urban water supplier supply portfolios in this emergency regulation?

Urban water suppliers are best positioned to manage the reliability of their supply portfolios - indeed, providing reliable water supply is the basic responsibility and legal mandate for water suppliers. This information is documented extensively in Urban Water Management Plans, and are readily available from either water suppliers themselves or from the Department of Water Resources.

Thank you for your consideration.

Sincerely,



Eric M. Wier, PE
Public Works Director
City of Crescent City