

August 11, 2011

Humboldt County Planning Commission
3015 H Street
Eureka, CA 95501-4484

Re: Comments on the Water Resources Element of Humboldt County's Draft GPU and the associated Staff Report for the Planning Commission's 8/11/11 meeting

Dear Commissioners:

These comments are submitted on behalf of the Healthy Watersheds Working Group. We wish to provide our input on the changes proposed in the Staff Report for the Planning Commission meeting of August 11, 2011.

First off, we want to state our appreciation to Staff and this Commission for your work so far on this crucial element. We are generally supportive of the recommendations put forward by staff in their most recent staff report. We fully support the language revisions for WR-G7 (Effective Conservation Strategies), WR-G9 (Storm Drainage), WR-Px (Water Export Facilities) and WR-P31 (Downstream Peak Flows).

We wish to suggest the following language changes (in red) for WR-G2:

WR-G2. Water Resource Habitat. River and stream habitat capable of supporting ~~abundant~~ the recovery and continued viability of wild, native coldwater fish populations.

Although salmonids are viewed as a keystone species, and restoration of their populations is of extreme importance, we concur with Staff's recommendation to broaden this policy to include other native fish species such as Sturgeon and Lamprey. However, with this modification, we feel it is crucial that this language clearly focuses on *stable* populations of *wild, native* fish.

We also recommend revisions to the newly proposed **WR-IMx2**. Given the impaired condition of most of the County's watersheds, we recognize the need for enforcement with regard to activities that negatively impact water quality and quantity regardless of whether a development, or use, is legal or not. As such, we recommend the following changes (in red):

WR-IMx2 Prepare an ordinance to provide increased enforcement capabilities ~~for unpermitted development~~ within critical watershed areas ~~where land use and management activities result in, or have the potential to result in, adverse if the development~~ impacts to water resources. Work with the State Departments of Water Resources and Fish and Game to address illegal water diversions and over-subscribed water right allocations.

We support **WR-IMx2** as revised with the caveat that the County provide the erring parties with straight-forward strategies to correct their actions. This can be done, in part, through presenting educational materials on rainwater harvesting, water storage, greywater reuse, road maintenance, and Low-Impact Development techniques.

On a related note, we feel it is imperative that all uses of water, including water usage for marijuana cultivation and other agricultural purposes, are considered when managing this County's water resources, assessing watershed impacts, and budgeting for water storage requirements.

With regard to Water Storage, we continue to support the language we put forward for **WR-Px1** in our Working Group recommendations packet we submitted on July 14, 2011. Given that many Humboldt County watersheds already suffer from severe water shortages, new development in impaired watershed should be held responsible for providing an adequate water supply throughout the dry months that is not dependant on dry-season surface or ground water withdrawals. Given adequate storage capacity, in most locations throughout the County, rainwater harvest should provide a more than sufficient means to supply of clean, fresh water for use during the summer months. Where surface or groundwater withdrawals are necessary, we recommend that the County require forbearance agreements that eliminate withdrawals during low-flow conditions as Sanctuary Forest has done through their tanks and forbearance program in the Mattole watershed.

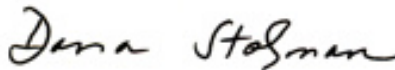
As to the subject of graywater, we fully support the County's newly proposed **WR-IMx**. Graywater Reuse Standards. Updating the County Code is a crucial step towards implementing safe, water conserving graywater systems. Beyond updating the code, we urge the County to take the steps necessary to make Graywater system permitting easier and more affordable. This can be done through a simple permitting process such as the City of Oakland's where the permit applicant only needs to go through one agency for approval, rather than two as is currently the case in the Humboldt County. With a more accessible and affordable permitting process, the County would benefit through a more open discourse resulting in better, safer systems that can achieve substantial water savings in rural *and* urban areas.

We thank you for this opportunity to comment. Do not hesitate to call upon us should you have any questions.

Sincerely,



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Healthy Humboldt



Dana Stolzman
Salmonid Restoration Federation



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