

July 14, 2011

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

Re: Healthy Watersheds Working Group Comments on the Water Resources Element of Humboldt County's Draft General Plan Update

Dear Commissioners:

Thank you for the opportunity to comment on the Water Resources Element of the County's General Plan Update. These comments and the attached suggested edits to the Water Resources Element Plan Alternatives Comparison Chart are submitted on behalf of the Mattole Restoration Council, Healthy Humboldt, Salmonid Restoration Federation, and Humboldt Baykeeper. We offer our gratitude to this Commission and to County staff who have worked so hard for a General Plan that will benefit generations to come, human and wild.

Historic impacts, in combination with threats from contemporary practices, pose a significant challenge to restoration of watershed health. Over the last 150 years, resource extraction and land use practices have severely altered the streams and rivers of the North Coast. At the time our current General Plan was adopted in 1984, the public at large was only beginning to understand the direct relationship between land use practices and watershed health. Since that time we have witnessed the continued unraveling of many local watersheds, and the further decline of once abundant salmon runs.

Since the 1984 General Plan, the County has seen significant changes in land use practices and management. We feel that many of the policies under consideration as part of this update are a crucial step to meet our changing landscape and address the opportunities and challenges we face.

With this year's returns of Steelhead and Chinook salmon, we are reminded that salmonid populations can return to abundance here on the North Coast. It is with this hope, and our desire to see the County's streams and rivers flowing with waters that are clean, cool and plentiful, that we submit the following recommendations.

We have provided detailed comments in the attached voting chart but offer the following summary of our primary recommendations:

- We strongly support the adoption of a "Watershed Planning" framework in order to more adequately identify the interrelated nature of land use and watershed health. Utilizing a collaborative watershed-based approach to planning is a much needed step to collect relevant data and attend to the barriers interfering with watershed recovery. Along these lines, we also support identification and protection of critical watershed areas and groundwater recharge areas.
- We strongly support water storage requirements for *new* development in impaired watersheds. Rainwater catchment should be prioritized over surface diversions and use of groundwater. Where surface water or groundwater withdrawal is necessary, we recommend that forbearance agreements be required to eliminate dry-season withdrawals.

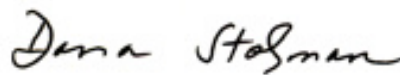
- We recommend that proposed subdivisions *and* new development be required to demonstrate the availability of a sufficient water supply in order to safeguard public health and safety and to protect groundwater and surface water resources. Rainwater harvest and storage should be encouraged to meet these needs.
- We support increased community collaboration and coordination between the county, state and federal agencies and local watershed restoration groups in order to leverage funds, collect data, and facilitate restoration projects.
- Educational efforts and incentive-based programs should be developed to encourage Best Management Practices relating to existing development; particularly to address issues related to stormwater management, private road maintenance, and water withdrawals.
- Encourage practices such as greywater reuse, rainwater harvest, native plant landscaping, bioswales and raingardens. These strategies can translate into substantial benefits to watershed health and can be utilized in both urban and rural areas.
- We strongly support restoration of flow rates to all rivers of the County. We support the County taking an active role in advocating for improved flow release from the Klamath, Trinity, and Eel Rivers. With regard to exports we believe that, while the County may not have the authority to approve exports in and of themselves, the County does have the authority over land use projects associated with water exports. As such we recommend that the County require Conditional Use Permits for water-export related structures and facilities.
- We recommend requiring Low-Impact-Development (LID) practices for all new development to minimize further development-related degradation of our streams and rivers. At a minimum, LID should be required in already impaired watersheds with incentives for LID in all other areas.

We look forward to attending the upcoming hearing and being available should you have any questions. Thank you for your consideration of these comments.

Sincerely,



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Dana Stolzman
Salmonid Restoration Federation



Beth Werner
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