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February 7, 2008

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Humboldt County Planning Commission
Community Development Services Department
3015 H Street
Eureka, California 95501

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HUMBOLDT COUNTY
PLANNING COMMISSION

Re: General Plan Update
Water Resources Technical Report
Water Resources Element

Dear Commissioners:

The Humboldt Association of Realtors® is submitting this letter as comment relating to water resources in the General Plan update.

Water Resources Technical Report

The Water Resources Technical Report informs us that in the greater Humboldt Bay area, the drinking water *supply* is generally in good condition and that there is sufficient water available. The report states the same for Fortuna. On the other hand, water *infrastructure* "is in dire need of upgrades." In many cases the pipes carrying the water are in need of repair and there are storage system problems. As we have been stating consistently throughout this General Plan update process, the fixing of infrastructure is critical to the future of the County. Domestic water is part of that core infrastructure system.

As regards to waste water, we suggest that septic systems be part of the discussion. As we have also stated previously, we see rural housing as part of the housing mix. In order to support this type of housing, septic systems are required. We note the report states that while conventional septic tank and leach field systems are most commonly used, there are alternatives, for example mound systems. "Humboldt County regulations have not been updated since 1984, and should be, to better incorporate these relatively new technologies." We encourage the County to modernize septic system rules as part of the General Plan update.

Water Resources Element

We are concerned about the costs associated with many of the proposals presented in this Element. As the report states "...Alternative A includes

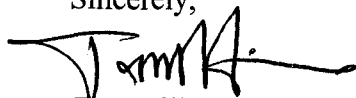
policies and implementation measures...[that] would add significant financial costs to the County.” The same could be said of Alternative B. Given this, there is an argument that this entire optional Element could be deleted. Per staff comments, Alternative C omits any new prescriptions and implementations. Further, staff states that “...CEQA review and application requirements may result in protections similar to those of Alternative B...” We advocate for: eliminating all the added over-regulation proposed by Alternatives A and B, supporting Alternative C and letting CEQA address the issues. We also point out that many of the issues discussed in this Element are already covered by either state Water Quality Control Board rules or local Public Health and Environmental Health regulations. County Planning Division involvement only creates unnecessary redundancy.

If, however, the County insists on including this Element, then we suggest that at least an economic analysis should accompany all proposed changes/additions to the existing General Plan. A cost/benefit approach may be appropriate. We would like to emphasize that all the proposals add costs which typically are passed on to new home buyers. To be fair to the public, these added potential costs should be identified and reported so that the public knows what the results of the General Plan update will cost.

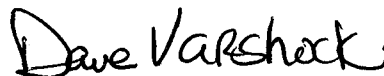
We would also like to comment on what appears to be an unusual amount of special interest group inclusion. It is interesting to note that it appears the influence of the water quality/restoration lobby is greater than the bicycle lobby. There are several polices and implementation measures (e.g. WR-P49, WR-IM8) which support “coordinating with...”, “working with...” “community-based watershed restoration groups.” We note there is no reference to special interest groups, for example, in the Circulation Element. Why are the water special interest groups specifically cited when the bicycle lobby, for example, is not referenced in the Circulation Element nor the home builders lobby in the Land Use Element nor the Realtors in the Managing Growth Element?

We appreciate your consideration of our comments and look forward to continued participation in the General Plan update.

Sincerely,



Tom Hiller
President



Dave Varshock
Government Relations Chair

Attachment

cc: H. C. Board of Supervisors
Kirk Girard, Community Services Director

13.6.4 Plan Alternatives Comparison Chart

Table 3-1. Plan Alternatives Comparison Chart						
Plan Alternative		Goals and Policies			Staff Remarks	Vote: R, D, M
Surface Waters						
A	B	C	D	WR-P1. Ensure that land use decisions are consistent with the long term value of water resources in Humboldt County.* (3361.1)		R
A	B	C	D	WR-P2. Regulate development that would pollute watershed areas. * (3361.2)		R
A	B	C	D	WR-P3. Ensure that the intensity and timing of new development will be consistent with the capacity of water supplies.* (3361.3)		R
A	B	C	D	WR-P4. Existing water uses shall be considered during the review for new water uses.* (3361.4)		R
A	B	C	D	WR-P5. Projects must provide evidence of water availability prior to recordation of map.* (3361.5)		R
A	B	C	D	WR-P6. Continue participation in all state, regional or local water resource planning efforts effecting surface run-off or groundwater supplies.* (3361.6)		R
A	B	C	D	WR-P7. Encourage further investigation on the County's water resources by federal and state water resource agencies.* (3361.7)		R
A	B	C	D	WR-P8. The development of environmentally sound small hydroelectric projects on publicly and privately owned lands in Humboldt County is generally encouraged. The County should only examine small hydroelectric project proposals for impacts not reviewed by other agencies and for overall consistency with the intent of the General Plan.* (3361.8)		R
	B			WR-P9. Resist accepting administrative responsibility for regulatory programs required of State or Federal agencies unless a State or Federal subvention will compensate the County for costs associated with such shift in administrative responsibility.		R
A	B			WR-P10. Projects requiring a grading permit shall have an erosion control program approved, where necessary. Projects shall be reviewed in an effort to avoid erosion and sedimentation, and minimize soil erosion and discharge of sediments into surface runoff, drainage systems, and water bodies.	Already in existing grading ordinance covered by Public Works	D

A	B		WR-P11. Where practical and when warranted by the size of the project, parking lot storm drainage shall include facilities to separate oils and salts from storm water in accordance with the recommendations of the Storm Water Quality Task Force's California Storm Water Best Management Practices Handbooks (1993).	Already in existing grading ordinance covered by Public Works	D
A	B		WR-P12. Rivers, streams, ponds, and wetlands shall be integrated into new development in such a way that they enhance the aesthetic and natural character of the site while disturbance to the resource is avoided or minimized and fragmentation is limited.	Already in existing grading ordinance covered by Public Works	D
A	B		WR-P13. Natural watercourses shall be integrated into new development in such a way that they enhance the aesthetic and natural character of the site without disturbance.	Already in existing grading ordinance covered by Public Works	D
A	B		WR-P14. Modification of natural stream beds and flow shall be regulated to ensure that adequate mitigation measures are utilized.	Already in existing grading ordinance covered by Public Works	D
A	B		WR-P15. Reduce Toxic Runoff. Reduce the volume of urban run-off from pollutants—such as pesticides from homes, golf courses, and other uses), cleaning agents, swimming pool chemicals, and road oil—and of excess sediments and nutrients from agricultural operations, and other toxic materials in runoff.	Already in existing grading ordinance covered by Public Works	D
A	B		WR-P16. Reduce Pathogen, Sediment, and Nutrient Levels. Support programs to maintain pathogen and nutrient levels at or below target levels set by the Regional Water Quality Control Boards, including the efforts of ranchers, dairies, agencies, and community groups to address pathogen, sediment, and nutrient management in rural watersheds.	Already in existing grading ordinance covered by Public Works	D
A	B		WR-P17. Design County Facilities to Minimize Pollutant Input. Design, construct, and maintain County buildings, roads, bridges, drainages, and other facilities to minimize the volume of sediment and other pollutants in storm water flows, and continue to improve road maintenance methods to reduce erosion and sedimentation potential.	Already in existing grading ordinance covered by Public Works	D
A	B		WR-P18. Continue to support local storm water and community watershed group efforts to inform the public about practices and programs to minimize water pollution.		D

A	B			WR-P19. Require quality of treated water to conform with beneficial water use standards to the extent feasible.	Already in existing grading ordinance covered by Public Works	D
Groundwater						
A	B	C	D	WR-P20. The availability of groundwater should be used as a prime factor in determining the desirable amount of residential development in a particular area in order to protect groundwater resources from depletion or contamination. (3361.5)*		R
A	B			WR-P21. Utilize the CEQA process to address the cumulative impacts of new agricultural wells and new residential wells required for discretionary projects on existing water users and upon creeks in all areas of the County.	Already covered by Environmental Health Department	D
A	B			WR-P22. Conserve, enhance and manage groundwater resources on a sustainable basis which assures sufficient amounts of clean water required for future generations, the uses allowed by the General Plan, and the natural environment.	This is a goal, not a policy	M
A	B			WR-P23. Be willing to modify policies and programs as new information becomes available, recognizing the difficulty of assessing and resolving groundwater problems.		R
A	B			WR-P24. Require that discretionary projects, to the maximum extent practicable, utilize BMPs to maintain or increase the site's pre-development absorption of runoff to recharge groundwater.	Already covered by Public Works	D
A	B			WR-P25. Encourage new groundwater recharge opportunities and protect existing groundwater recharge areas.	This is a goal, not a policy	M
A	B			WR-P26. Require consideration of naturally occurring and human caused contaminants in groundwater in new development projects. Work with the NCRWQCB to educate the public on evaluating the quality of groundwater.	This is a goal, not a policy	M
A	B			WR-P27. For discretionary projects involving groundwater withdrawals, ensure that groundwater will not be adversely affected by saltwater intrusion.	This is a goal, not a policy	M
A				WR-P51 Encourage and support research and monitoring of local ground water conditions, aquifer recharge, watersheds and streams.		D
A				WR-P52 Support the establishment and maintenance by the County and other agencies of a system of monitoring wells throughout the county, utilizing existing wells where feasible.		D

Public Water Systems						
A	B			<p>WR-P28. Support to the extent feasible the actions and facilities needed by public water systems to supply water sufficient to meet the demands which are estimated in adopted master facilities plans, consistent with adopted general plans, urban water management plans and the sustainable yields of the available resources and in a manner protective of the natural environment.</p>	<p>This is a goal, not a policy</p>	M
A	B			<p>WR-P29. Assist public water suppliers in assuring that proposed water supplies and facilities are consistent with adopted general plans, that all planning jurisdictions are notified of and consider potential water supply deficiencies during the preparation of such plans, and that adopted general plans accurately reflect secure water sources.</p>	<p>This is a goal, not a policy</p>	M
A	B			<p>WR-P30. Encourage the preparation of municipal service reviews and urban water management plans where required by State law, for all public water supply systems to design and construct all facilities in accordance with sustainable yields and the general plans of applicable jurisdictions.</p>	<p>This is a goal, not a policy</p>	M
A	B			<p>WR-P31. Maintain consistency between the General Plan, adopted groundwater management plans and the municipal service reviews of public water suppliers through meetings between staff of the Local Agency Formation Commission (Lafco) and public water suppliers, Lafco review of proposed municipal service reviews, and referral of General Plan changes to all public water suppliers.</p>	<p>This is a goal, not a policy</p>	M
A	B			<p>WR-P32. Coordinate the County's land use decisions and actions to be consistent with the Water Resources Element.</p>		D
A	B			<p>WR-P33. Critical Water Supply Areas. Identify Critical Water Supply Areas within the unincorporated County and apply the standards for such areas.</p>		D
A				<p>WR-P53. Help public water suppliers to disseminate and discuss information on the limits of available water supplies, how the supplies can be used efficiently, acceptable levels of risk of shortage for various water users, priorities for allocation of the available water supply, conditions for use of limited supplies, and limits of alternate sources which could be used or developed.</p>		D
Conservation and Re-Use						
A	B	C	D	<p>WP-P34. Maximize Support the use of water conservation techniques appropriate for new and existing development.*</p>		M

A	B		WR-P35. Encourage disposal methods which minimize reliance on discharges into natural waterways. If discharge is proposed, review and comment on projects and environmental documents and request that projects maximize reclamation, conservation and reuse programs to minimize discharges and protect water quality and aquifer recharge areas.		M
A	B		WR-P36. Use water effectively and reduce water demand by. (1) Encouraging water conserving design and equipment in new construction. (2) Encouraging water conserving landscaping and other conservation measures. (3) Encouraging retrofitting with water conserving devices. (4) Encouraging service providers to design wastewater systems to minimize inflow and infiltration to the extent economically feasible. (5) Limiting impervious surfaces to minimize runoff.		M
A	B		WR-P37. Encourage service providers to increase the use of treated water where the quality of the recycled water is maintained. meets all applicable regulatory standards and is appropriate for the intended use and beneficial uses of other water resources will not be significantly impacted.		M
A	B		WR-P38. Promote and encourage the efficient use of water by all water users.		R
A	B		WR-P39 Avoid water reuse which could significantly adversely affect the quality of groundwater or surface water.		D
A	B		WR-P40. Support programs to monitor, establish and publicize per capita or per unit water use in each community and area and utilize this data in groundwater management plans, master facilities plans, and wastewater treatment plans.	Already covered by CSD's	D
A	B		WR-P41. Encourage monitoring for all water use and water metering and pricing systems for public water suppliers which require water users to pay all costs associated with the amount of water used. Encourage pricing mechanisms for public water suppliers which provide incentives for water users employing conservation and reuse programs.	Already covered by CSD's	D
A	B		WR-P42. Encourage and support conservation for agricultural activities which increase the efficiency of water use for crop irrigation, frost protection and livestock.	Already covered by CSD's	D

Importing and Exporting						
A	B	C	D	<p>WR-P43. Large water export projects will not be approved. or supported unless specific requirements and assurances are satisfied. These shall include the 1978 water policy statement policies regarding "Water Export Projects on Humboldt County Streams". (3361.10) (See Standards WR-S8)</p>		M
A	B			<p>WR-P44. Require full assessment of impacts on the environment and impacts on the quality and quantity of water for Humboldt County water users of all existing and new proposals to physically export water to new locations outside from Humboldt County or to substantially increase water supply to existing out-of-county locations. Any consideration of exporting additional water resources shall place primary priority upon the benefit of and need for the water resources in Humboldt County and shall assure that water resources needed by urban, rural and agricultural water users and dependant natural resources in Humboldt County will not be exported outside the County.</p>		D
A				<p>WR-P55. No new exports of water to locations outside Humboldt County shall be permitted. unless the County has issued a Conditional Use Permit for such exportations. In the event a permit is issued, it shall set forth with specificity the details of the exportations (e.g. quantity, origination location, destination location, period of exportation, etc.).</p>		M
Stormwater Management						
A				<p>WR-P54. Storm Water/Non-Point Source Pollution Management. Promote integration of storm water and NPS best management practices that protect source watersheds and aquatic systems, and introduce natural system design standards into urban areas.</p>	Already under State control	D
Watershed Management						
A	B	C	D	<p>WR-P45. Support the development of fisheries enhancement projects on small Humboldt County streams.* (3361.12)</p>		R
A	B	C	D	<p>WR-P46. Ensure that projects located within state designated wild, scenic or recreational river basins are consistent with the guidelines in the State Wild and Scenic Rivers Act (as amended).* (3361.13)</p>		R
A	B	C	D	<p>WR-P47. Support flow release schedules from existing reservoirs that maintain or enhance the fisheries of those rivers.* (3361.11)</p>		R

A	B		WR-P48. Correlate the quality and quantity of water captured, stored and contained within each unique watershed to the needs of beneficial water uses by all county residents, local industry, agriculture and the natural environment.		D
A	B		WR-P49. Work with the NCRWQCB, watershed-focused groups and stakeholders in the collection, evaluation and use of watershed-specific water resource information.		D
A			WR-P56. Watershed Based Planning and Assessments. Utilize watershed boundaries for planning in concert with other jurisdictional boundaries (such as municipal or special district boundaries), and incorporate the principles of watershed planning as outlined by the California Watershed Manual http://cwam.ucdavis.edu		D
A			WR-P57. Integrated Riparian Corridor Management Protect and enhance riparian corridor biodiversity and community benefits, while using these natural waterways to accomplish flood protection, groundwater stewardship and storm water management objectives.		D
A			WR-P58. Floodplain Management. Implement "No Adverse Impact Standards" as recommended by the Association of Flood Plain Managers, and manage floodplains for beneficial uses.	Refer to Flood Plain Managers	D
Hydropower Projects Re-licensing					
A	B		WR-P50. The County should request a determination from re-licensing projects on what conditions will effectively balance development values (electric power, flood control and water supply) with non-developmental values (environmental resource protection and values) that best reflect the public interest.		D
A	B		WR-P51. The County should request that the California Public Utilities Commission (CPUC) takes the time to complete its ongoing environmental review under the California Environmental Quality Act. A full review is required to document cumulative damages and potential impacts of ownership transfer and to provide a basis to identify necessary mitigation measures.		D
Standards					

A	B	C	D	WR-S1. Development which could potentially "pollute a watershed area" includes, but is not limited to: the placement of septic systems, junkyards, waste disposal facilities, industries utilizing toxic chemicals, and other potentially polluting substances proximate to streams, creeks, reservoirs, or groundwater basins. It can also occur from additions of natural material into a stream because of land use practices but does not include normal agricultural practices which do not require permits from the County.* (3362.1)	Already covered by Water Quality Control Board	D
A	B	C	D	WR-S2. A Critical Water Supply Area is defined as the specific area used by a municipality or community for its water supply system, which is so limited in area that it is susceptible to a potential risk of contamination from development activities.* (3362.2)	Already covered by Water Quality Control Board	D
A	B	C	D	WR-S3. Development proposed within Critical Water Supply Areas shall demonstrate that no risk of contamination to the water supply area would occur due to the development activity proposed.* (3362.3)	Already covered by Water Quality Control Board	D
A	B	C	D	WR-S4. Development within Critical Water Supply Areas shall utilize appropriate Erosion Control Measures including, but not limited to, those in the grading ordinance and this chapter.* (3362.4)	Already covered by Water Quality Control Board	D
A	B	C	D	WR-S5. "Water Conservation Techniques" include but are not limited to, domestic and industrial low-flow water fixtures and native vegetation landscaping.* (3362.5)	Already covered by Water Quality Control Board	D
A	B			WR-S6. The County shall review new development proposals that include the withdrawal of groundwater resources for use within the County to determine the safe yield, and to ensure that other users are not adversely affected.		D
A	B			WR-S7. The County will review projects and include requirements for compliance with State and Federal water quality regulations, including the Clean Water Act and requirements of the National Pollutant Discharge Elimination System (NPDES).		D
A	B	C	D	WR-S8. Water Export Projects on Humboldt County Streams. The Humboldt County Board of Supervisors, prior to giving its approval and support to large export projects on County streams, will require the following: (see text for items A through L.)(3362.6)		D

A	B	C	D	<p>WR-S9. Development of fisheries enhancement projects should include:</p> <p>A. An immediate pilot project initiated on one of the Humboldt County streams for the express purpose of establishing the feasibility of small dams designated and operated only for fishery development and enhancement.</p> <p>B. Efforts designed to improve the anadromous fishery resources of Humboldt County streams. Specifically, the assessment of the natural capacities of the streams and identification of factors limiting production of anadromous fish.</p> <p>C. The use of Humboldt County Water Resources for the development of mariculture and aquaculture, with appropriate regulations to protect the native fish populations and the general public interests.* (3362.7)</p>		No Comment
A	B	C	D	<p>WR-S10. Small hydroelectric projects for the purposes of this policy are defined as run of the river type diversions and existing impoundments with a maximum generating capacity of five (5) megawatts.* (3362.8)</p>		No Comment
A				<p>WR-S11. Require proof of groundwater with a sufficient yield and quality to support proposed uses in Class 3 and 4 water areas. Require test wells or the establishment of community water systems in Class 4 water areas. Test wells may be required in Class 3 areas. Deny discretionary applications in Class 3 and 4 areas unless a hydrogeologic report establishes that groundwater quality and quantity are adequate and will not be adversely impacted by the cumulative amount of development and uses allowed in the area, so that the proposed use will not cause or exacerbate an overdraft condition in a groundwater basin or sub basin.</p>	Already covered un CEQA	D
Implementation Measures						
General						
A	B			<p>WR-IM1. Coordinate with federal and state land management agencies to ensure adequate protection of watersheds that are vital to Humboldt County's groundwater and surface water resources.</p>		D
A	B			<p>WR-IM2. Design, construct, and maintain County buildings, roads, bridges, drainage and other facilities to minimize sediment and other pollutants in storm water flows. Develop and implement "best management practices" for ongoing maintenance and operation.</p>		R

A	B		<p>WR-IM3. Work cooperatively with the RWQCB to manage the quality and quantity of storm water runoff from new development and redevelopment in order to:</p> <p>(1) Prevent, to the maximum extent practicable, pollutants from reaching storm water conveyance systems.</p> <p>(2) Limit, to the maximum extent practicable, storm water flows from post development sites to pre -development quantities.</p> <p>(3) Conserve and protect natural areas to the maximum extent practicable.</p>	Follow State guidelines	D
A	B		<p>WR-IM4. Continue to require grading plans to include measures that address soil erosion and on-site sediment retention and consider upgrading requirements as needed to avoid sedimentation in storm water to the maximum extent practicable. Require developments to include on-site facilities for the retention of sediments, and, if necessary, upon project completion, require continued monitoring and maintenance of these facilities.</p>	Follow State guidelines	D
A	B		<p>WR-IM5. Seek opportunities to participate in developing programs and implementing projects for water quality restoration and remediation with agencies and organizations such as RWQCBs, CDFG and RCDs in areas where water quality impairment is a concern.</p>		D
A	B		<p>WR-IM6. Actively pursue the abatement of failing septic systems that have been demonstrated as causing a health and safety hazard.</p>		D
A	B		<p>WR-IM7. The County shall continue to implement Ordinance provisions for buffers and special setbacks for the protection of riparian areas and wetlands. The County shall encourage the incorporation of protected areas into conservation easements or natural resource protection areas.</p>		D
A	B		<p>WR-IM8. Coordinate Watershed Efforts. Work with land and water management agencies, community-based watershed restoration groups, and private property owners to explore methods and programs for maintaining and improving watershed health.</p>		D
A	B		<p>WR-IM9. Work with the North Coast Regional Water Quality Control Board (NCRWQCB) and interested parties in the development and implementation of future NCRWQCB requirements so that the needs of Humboldt County can be met.</p>		D

A	B		WR-IM10. Work with the SWRCB, DWR, California Department of Health Services (DHS), CalEPA, and applicable County and City agencies to seek and secure funding sources for development of countywide groundwater quality assessment, monitoring, remedial and corrective action and awareness/education programs.	Too vague, too subjective and too cost prohibitive	D
A	B		WR-IM11. Require Restoration of Degraded Areas. Require replanting of vegetation and remediation of associated erosion in conjunction with requested land use approvals, especially those including roads and grading on steep slopes.		D
A	B		WR-IM12. Integrated Water Resources Funding Program Description: Work with public water suppliers, utility districts, stakeholder groups and interested parties to seek and secure outside funding sources for Water Resources Element programs and associated plans.		D
A	B		WR-IM13. Watershed Planning: Seek funding opportunities for collaborative watershed planning approaches to water quantity and quality enhancement and protection, where such an approach is the desired method of accomplishing the program objectives.		D
A			WR-IM36 Establish development standards to maximize retention of runoff and regulate development to avoid, to the maximum extent practicable, pollution of storm water, water bodies and groundwater.		D
A			WR-IM37 Inform the public about practices and programs to minimize water pollution and provide educational and technical assistance to agriculture in order to reduce sedimentation and increase on-site retention and recharge of storm water.		D
Groundwater					
A	B		WR-IM14. Encourage and support research on and monitoring of local groundwater conditions, aquifer recharge, watersheds and streams.	Refer to appropriate Agencies	D
A	B		WR-IM15. Coordinate the County's land use decisions and actions to be consistent with the Water Resources Element.	Refer to appropriate Agencies	D
A	B		WR-IM16. Work with NCRWQCB, DWR, DHS, CalEPA, and applicable County and City agencies to seek and secure funding sources for development of groundwater assessment, protection, enhancement and management programs.	Refer to appropriate Agencies	D
Public Water Systems					

A	B		WR-IM17. Request technical assistance and water resource data from public water suppliers and share available water resource information with them and the public.		D
A	B		WR-IM18. Cooperate with public water suppliers in the planning, development and construction of the storage and transmission facilities needed to supply water pursuant to adopted General Plan policies, urban water management plans, water supply agreements, municipal service reviews, and programs to mitigate identified water quantity conditions, where applicable.	Not a land use issue – refer to appropriate agency	D
A	B		WR-IM19. Pursuant to the requirements of Government Code 65400-65402, request that public water suppliers, including cities, county-dependent districts, special districts and other local public agencies, consult with the County prior to acquiring a site or developing any well or facilities for public water supplies in the unincorporated area and request a determination of consistency with the Humboldt County General Plan.		D
A	B		WR-IM20. Assist public water suppliers in the assessment of available water supplies and protection of water quality.		D
A	B		WR-IM21. Work with HBMWD and other public water suppliers in the development and implementation of long term plans for water supply, storage, and delivery necessary to first meet existing water demands and, secondly, to meet planned growth within the designated service areas, consistent with the sustainable yield of water resources.		D
A			WR-IM38. Monitor groundwater conditions, require descriptive information for well permits, and analyze, map and publicize the data gathered.		D
A			WR-IM39 Increase institutional capacity and expertise within the County to competently review hydrogeologic reports and data for critical indicators and criteria.		D
A			WR-IM40 Initiate an educational program to inform residents, agriculture, businesses and other groundwater users of best management practices in the areas of efficient water use, water conservation, and increasing groundwater recharge. Implementation would include preparation and distribution of educational materials and public workshops.		D

A		<p>WR-IM41 Revise ordinance requirements for permits to drill, replace, deepen or repair all wells as follows:</p> <ol style="list-style-type: none"> 1. Show exact locations, depths, yield, drilling logs, soil data, flow direction and water levels of proposed wells and existing wells on the site, locations of known nearby wells, proposed uses of the water, and estimated amount of water use. Review available groundwater data and well permit information in the permit area and make this information available to the applicant to the extent allowed by law. 2. Based upon available information indicating a need, require that new wells be located definite distances from property lines and existing wells. Implementation would develop setbacks which could vary by well size, location of nearby wells, water use, groundwater availability, lot size and other appropriate factors. 3. Require proof of groundwater quantity and quality sufficient for proposed uses and existing beneficial uses on the site in all Class 3 and 4 areas and in other areas with identified water quality and quantity problems, special area studies underway or where adopted management plans require it. Implementation would develop procedures and quantitative standards for pump tests, well yields, pollutant levels, and water storage. 4. Include provisions for applicant fees and other funding of County costs. 5. In areas where a groundwater management plan has been approved and has been accepted by the County, require the issuance of well permits and any limitations imposed on well permits to be consistent with the adopted plan. 	<p>Already sufficient regulations</p>	D
A		<p>WR-IM42 Revise procedures for proving adequate groundwater for discretionary projects by adding criteria for study boundaries, review procedures, and required findings that the area's groundwater supplies and surface water flows will not be adversely impacted by the project and the cumulative amount of development allowed in the area and will not cause or exacerbate groundwater overdraft, land subsidence or saltwater intrusion. Procedures for proving adequate groundwater for discretionary projects should be flexible enough to consider the expense of such study in relation to the size of the discretionary project.</p>	<p>Already sufficient regulations</p>	D