



Redway Community Services District
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*Submitted
PC Hearing
8/25/11*

August 22, 2011

To: Humboldt County Planning Commission

From: Redway Community Services District

Re: Water Resources Element of the General Plan Update

Dear Commissioners:

The board of directors of the Redway Community Services District has discussed the Water Resources Element of the General Plan Update at several of our recent meetings. In those discussions, we came to consensus on several points, which we are submitting for your consideration.

First, we hope that you understand that the situation in the South Fork Eel River is very different from that of the Humboldt Bay Municipal Water District and the areas it serves. While there are no incorporated cities in our watershed, there are many public districts and private companies that supply treated water to smaller communities. Redway CSD, Garberville Sanitary District, and Miranda CSD draw water for their customers directly from the South Fork Eel, while other communities, such as Phillippsville, Myers Flat, and Weott, draw water from springs and wells in the watershed. Additionally, there are thousands of small private users dependent on sources higher in the watershed for domestic and agricultural use.

In the South Fork Eel River, listed species and humans are in competition for water, especially in low flow years. The South Fork Eel is now "fully allocated," according to the California Department of Fish and Game, but it is questionable whether enough water is actually available during low periods for users like GSD and RCSD to use their entire allocations without significant consequences to downstream users as well as endangered species and other wildlife. The impact on species and their habitat, particularly salmon and steelhead, is particularly severe.

We recognize that public and private users share similar issues and impacts overall. Despite individual differences, rural households have a similar domestic use as town households (estimated at 800-1000 cubic feet per month), for drinking, cooking, sanitation and home gardens. Therefore we should all be working together to meet the same goals to protect our watershed.

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Regarding the Water Resources Element of the General Plan Update, Redway CSD supports:

- 1) Provisions that support the recycling of graywater, water storage, and groundwater recharging for both private and public users. Public users such as Redway CSD should encourage their customers to set up graywater systems to reduce water use and lessen the need for wastewater treatment. The county should work with public districts as well as private households and businesses to help them find methods and funding for increasing water storage during the rainy season so that districts can draw less water in the dry season.
- 2) Provisions that support public districts' efforts to encourage their customers to conserve water use, such as education, distribution of water-saving devices, and tiered rate structures.
- 3) Provisions that encourage and support development of stormwater management facilities, especially at the community level. Many communities have delayed dealing with stormwater issues created by levels and location of development that were not anticipated when communities were originally planned.
- 4) Watershed-based planning that brings together all the stakeholders in the watershed, including public districts.
- 5) Recognition that the South Fork Eel watershed also includes parts of Mendocino County, and inclusion of Mendocino landowners, communities, and public officials in watershed planning.
- 6) The need to consider funding when creating regulation, especially when dealing with legacy issues such as aging infrastructure and systems that need to be re-designed to meet current and future growth.

Finally, Redway CSD is concerned about the designation of "Critical Watershed Areas" and "Critical Municipal Water Supply Areas" by the Board of Supervisors. While this has potential good effects, including watershed planning and opening doors to needed funding, the county should be cautious about creating new

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regulation that could be burdensome to small, financially struggling districts and water companies, resulting in a decline in our ability to reach our objective of protecting the quantity and quality of our water supply for all beneficial uses.

Thank you very much for your consideration,

A handwritten signature in blue ink, appearing to read 'M. McKaskle', with a long horizontal flourish extending to the right.

Michael McKaskle
Chairman, Redway CSD Board of Directors