

*Submitted
at PC
Hearing
8/25/11*

Please consider the following changes:

WR-Px Water Export Facilities – No new facilities for export of water to locations outside of Humboldt County shall be permitted unless the County issues a Conditional Use Permit for such export facilities. Issuance of the use permit shall require a finding that the proposed water export will not significantly and adversely affect ~~be detrimental to~~ beneficial uses within the County.

Please consider the modifications that the District suggests in our comments on the Water Resources Element matrix dated 7/7/11 (see District comments 7/18/11):

- WR-G4 Include text that reflects desire for local control “in a manner that ensures local control over these vital resources”
- 3361.9 District modifications reflect that local water suppliers request further water resources investigations, not the state and/or federal agencies.
- WR-P23. Add phrase “cost effective”.
- 3361.7 Add phrase “cost effective”.
- WR-P25. Add in phrase “unless the interests of the residents of Humboldt County are protected through ...”
- WR-P26. Add in the names of the rivers with existing water exports, “on the Trinity, Klamath, Eel, and Van Duzen rivers...”
- 3361.10. Delete “approved or” and replace “shall” with “may”
- WR-S12. The District has been advised that the County does not have legal authority to approve water export projects, so we suggest deleting references to Water Code sections, and adding text so WR-S12 reads “...to demonstrate that an export project will not have an unreasonable impact on the area of origin.”
- 3362.6. In Section C, “absolute assurance” is not achievable or realistic. The point is important so the District provides some alternative language.
- WR-S13. Similar changes suggested to delete references to the Water Code 1810 because it applies to wheeling water through another agency’s system.

Overarching theme in these comments:

- 1. District is trying to protect local resource and ensure local control via 3 broad options, local water use (first) and transport/export and instream flow (simultaneous seconds).**
- 2. District is doing all it can to provide enough municipal supply in the future, after 2029 when existing water rights expire.**