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FRIENDS OF THE EEL RIVER

July 21, 2011

Humboldt County Planning Commission and
Community Development Services
3015 H Street
Eureka, California 95501-4484

Re: Comments on Water Resources Element of the Humboldt County General Plan Update

Dear Planning Commissioners and Community Development Services Staff -

The following comments on the Water Resources Element of the Humboldt County General Plan Update are respectfully submitted on behalf of the Friends of the Eel River. Friends of the Eel River works to restore the Eel River and her tributaries to a natural state of abundance, wild and free.

The Water Resources Element is a keystone of the General Plan Update. Under the Guiding Principles adopted by the Board of Supervisors, the updated General Plan "must include unambiguous natural resource protections; especially for open space, water resources, water quality, scenic beauty and salmonids." (See September 2004 *Sketch Plan Alternatives: Summary of Planning Commission and Board of Supervisors Recommendations*.) The Water Resources Element is clearly central to three of these vital natural resource categories, and implicated in another, scenic beauty.

To provide effective protections for Humboldt County's water resources, water quality, and salmonids, we must begin by acknowledging the extent and seriousness of the harms already inflicted on those values. Humboldt County's primary watersheds, including the Eel River, are now listed as impaired. The North Coast's surviving salmon runs have been listed under the state and federal Endangered Species Acts. All that has happened under the inadequate protections of the 1984 General Plan still in effect.

The hearing draft of Chapter 11 properly notes that "abundant water resources and biologically rich watersheds are defining characteristics of Humboldt County." What

does it mean, then, that some of our rivers are overallocated, toxic algae alerts are a summertime staple, and we're losing coho in the Mad and the Mattole?

Many of the proposals in the Water Resources Element now before the Planning Commission are useful and necessary steps toward effective protection of Humboldt County's watersheds and watercourses. In general, FOER supports the recommendations of the Healthy Watersheds Working Group; where choices are presented between Alternatives A/B and C/D, Friends of the Eel River supports the A/B options, and stronger Alternative A provisions where those are presented.

We particularly wish to underscore the importance to the Eel River of several proposed measures in the Water Resources Element. We urge you to support the following measures:

- **Restoring river flows and discouraging water exports** from rivers flowing through the County: as the Hearing Draft suggests, water exports is the county's most significant water resource policy issue. It is altogether appropriate that the County take a set of clear and principled positions to guide its policy formation in coming decades.

FOER supports Goals WR-G8, Gx as proposed by Healthy Watersheds Working Group, Policies WR – P24, 25, 26, 27, and WR-Px, as amended in HWWG comments, and Standard WR-S12. With respect to WR-Px, P25, and S12, we agree that the County should exercise effective oversight of proposed water export facilities and mechanisms, consistent with a larger policy of working actively to restore flows diverted from the Eel, Trinity, and Klamath Rivers.

We don't support proposed language in the Hearing Draft that appears to carve out an exception for potential water exports from the Mad River: while the county may lack the power to prevent water exports altogether, it should clearly work to encourage local uses as an alternative to water exports.

- **Standing up for the Public Trust in dam relicensing processes.** Policy 28A takes an important step toward river restoration when it states that "the County shall advocate that dam relicensing projects redress the historical over-emphasis on development values (electric power, flood control, and water supply) at the expense of non-developmental values (environmental resource protection, habitat restoration, and water quality)."
- **Policies consistent with salmon recovery:** Goals WR- G2, G5 and G8, Policy P5, Standard S13 as revised are each clearly relevant, but so too are measures concerning water supply and storage, including Policies P6 and Px1, and those which address road-related erosion, the primary source of salmon-killing sediment in our watercourses, including Policy Px6.

- **Protection for critical water resources:** We support the designation of “critical watershed areas” in P5, support the retention of Px1 language regarding water storage in temperature impaired watersheds, and in P-22 would urge the Commission to add language ensuring that the expansion of public water systems in Critical Water Supply Areas does not threaten surface and groundwater resources.

However, notwithstanding the significant and important improvements these and other measures would reflect over the outdated and inadequate existing General Plan, Friends of the Eel River cannot agree that the current draft of the Water Resources Element can be relied upon to provide the level of protection that Humboldt County’s world-class rivers and streams deserve, and will require, to secure a legacy of clean water, wild rivers, and abundant fisheries for generations to come.

Today, even Humboldt County’s rich rivers are over-appropriated and our legendary salmon severely threatened. We face a future in which demands on water will increase as supplies diminish in quantity and season. We have to look a generation ahead in creating a General Plan that will protect this most critical of all resources as the foundation of Humboldt County’s long-term prosperity.

We urge you to strengthen the General Plan’s protections for water resources in at least the following ways:

- Phase in fair standards for existing roads and developments that are harming water quality and fisheries. Encouraging education and the use of best management practices is an improvement over the county’s current failure to address the impacts of private non-timber roads, but it is neither fair nor realistic to proceed without the promise of meaningful standards for all roads and developments in the county.
- Phase in water storage requirements for existing developments, including not only household, domestic and fire protection, but also agricultural uses.
- Phase in water storage requirements that move users from surface withdrawals to rainwater catchment. While restricting surface withdrawals during low flow periods is an urgently necessary measure, as a strategy it is insufficient to protect adequate stream flows in the future.

Thank you for your careful attention to the future of Humboldt County.

Sincerely yours,



Scott Greason
North Coast Director

