

HUMBOLDT BAY MUNICIPAL WATER DISTRICT

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January 4, 2008

Kirk Girard, Director
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Planning Division
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County of Humboldt
3015 H Street
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HUMBOLDT COUNTY
PLANNING DIVISION

Dear Kirk and John:

Thank you for attending our December Municipal Customer meeting to present an overview of the recently-completed "Community Infrastructure & Services Technical Report" and associated draft of the County's "Community Infrastructure and Services Element" for the General Plan update. I would like to acknowledge and thank the County for securing grant funding to complete the Technical Report. I would also like to acknowledge and thank the County for highlighting and studying the critical link between infrastructure – whether it be water, wastewater, roads, storm drainage, flood control, law enforcement, or fire protection - to address the existing service needs within our communities, as well as begin to address infrastructure needs to meet future growth contemplated in the County's General Plan update.

At our Municipal Customer meeting, you requested comments on the Technical Report and draft Infrastructure Element by January 1st, although you acknowledged that comments will continue to be accepted on the proposed Element during the County's ongoing General Plan deliberations.

I apologize for our comments being submitted slightly beyond your requested date of January 1st. The following comments are based on my fairly quick review of the Technical Report and draft Infrastructure Element. Our District may have additional comments once my Board has had the opportunity to review and discuss these documents. I would like to invite you to make a brief presentation to my Board on the Technical Report, proposed Infrastructure Element, as well as the proposed Water Resources Element of the General Plan at our next Board meeting (February 14th). This will enable my Board to better understand the proposed Elements of relevance and importance to us, and to offer any comment they may have at the policy level.

Comments on the “Community Infrastructure & Services Technical Report”

- 1) I believe the report appropriately summarizes key factors influencing the need for infrastructure improvements and investments within the County as follows:
 - a. much of the County’s infrastructure is old, deteriorating and in need of improvement in its current state (that is absent any additional growth);
 - b. additional infrastructure will be required to accommodate growth contemplated in the General Plan update; and
 - c. significant infrastructure improvements and investments are needed to comply with the increasing and complex regulatory requirements.

- 2) The main body of the report (Section 6.3) briefly addresses HBMWD’s infrastructure needs. The report acknowledges that demands for domestic water will exceed currently available capacity within the planning horizon (that is infrastructure capacity not water supply capacity). As briefly noted in the report, expansion of the existing Ranney Collectors, possibly treatment capacity, and transmission capacity, particularly on the Samoa Peninsula, will be necessary over the longer-term when growth materializes as envisioned in the General Plan update.

- 3) The “Findings” and “Water and Wastewater” sections of the Executive Summary summarize the needs of retail-level service providers; however, the Executive Summary is completely silent in regards to needs at the wholesale/regional level. I request that you briefly address wholesale/regional needs in the Executive Summary. It is important for planners, developers or other audiences who only read the Executive Summary to understand that investments in the regional water system will be required at some point in the County’s planning horizon as growth materializes. Investments at the regional level will be costly, and will require significant lead time, so it is important that readers are aware of this.

- 4) The “Next Steps” section suggests that the County could take a leading role in expanding capacity for infrastructure maintenance and development, and that the County could take a leadership role in addressing some of the deficiencies noted in the Technical Report. This area is important for service providers to better understand and discuss with the County. I understand the County will be hosting a meeting soon with service providers to begin such discussions.

Comments on the draft Community Infrastructure and Services Element:

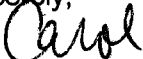
- 1) The “Community Infrastructure and Services Policy” section, and subsequent “Standards” section, requires the establishment and utilization of public infrastructure and services *standards*. It is important for service providers – given the role we play in infrastructure planning and development, as well as service delivery – to be aware of such standards and afforded the opportunity to comment on them as they are being developed.

2) In the "Implementation Measures" section for water and wastewater service providers:

- a. (IS-IM27): An organization for water and wastewater (such as association or authority) to improve water quality and service capacity is proposed. Working at the wholesale level, I am keenly aware of the benefits of sharing resources and "economies of scale." However, I am also aware of the important and intricate relationship between our District and our Municipal Customers who provide retail water services directly to the community. This relationship is important not only at the operational/service level, but also the policy/political level. If the County pursues a regional association or authority, its scope and purpose are important to define, and support and buy-in from the service providers essential for its success.
- b. (IS-IM28): This measure requires "Use of the County General Plan and Zoning Code in determining the size and location of water and wastewater facilities and the extent of services provided." This needs further definition and clarification. It is not appropriate for the County General Plan to dictate the size and location of specific facilities. Service Districts have specific service obligations and must have the latitude to plan for and determine the size and location of specific infrastructure additions.

Thanks once again for addressing our Municipal Customer group and for soliciting comments on these reports. I appreciate the County's efforts and leadership to begin to address the myriad of infrastructure issues we are facing the County. I hope you can join us for a brief presentation to my Board on February 14th.

Sincerely,



Carol Rische
General Manager

Cc: Wholesale Municipal Customers