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Humboldt Community Services District . . .

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October 29, 1998

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The Honorable Virginia Strom-Martin
California State Assembly
State Capital Building, Room 4098
Sacramento, CA 95814

Subject: Cal/Fed Water Use Efficiency Program

Dear Assemblywoman Strom-Martin:

We are writing this letter to express our strong opposition to the "one-size-fits-all" manner in which the current draft of the Cal/Fed Water Use Efficiency Program is proposed to be implemented. The document calls for any water purveyor in the State, who is required to submit an Urban Water Management Plan, to abide by the new and financially burdensome conditions of the proposed program. No distinction is made as to whether a specific purveyor/agency is in the Cal/Fed service area, in any way dependent on Cal/Fed, or whether the new conservation requirements are economically, environmentally or practically feasible in a given area.

The Cal/Fed process is viewed by many in our area as just another way to get more water from our area of origin into the Cal/Fed area. Placing ever more restrictive requirements for conservation on our community, where they may make marginal sense, leaves the impression that we are being asked to save water so that the southern part of the State can use what we have saved.

The communities we serve are committed to the wise use of water, both in current practice and in our strategic planning. We have an outstanding record of efficient water use within our District. This practice will continue to improve as additional building construction using current plumbing code water conservation requirements occurs.

We are convinced that the additional layer of regulation and the bureaucracy that will surely follow is not necessary for areas like ours which have absolutely no connection to the Cal/Fed process. We ask your support to limit implementation and regulations of the proposed plan to those agencies which directly benefit from Cal/Fed. We are certain that if the program is implemented as broadly as is currently proposed, major funding will have to be appropriated to assure proper execution and to offset the financial impacts to our community.

In our opinion, Cal/Fed has been moving very quietly on the development of this proposal. We had no idea anything of such momentous import to our agency and community was going on until, thankfully, we received a clear explanation from people in a position to understand what was really going on. A major reason for our ignorance is that the conservation proposal is buried in a very complex policy and planning framework. Its impacts have not been specifically explained to agencies like ours, which do not have the resources to follow the many elements of a huge undertaking like Cal/Fed.

I believe it is fair to say that we feel like we are being kept in the dark. We ask your support in urging Cal/Fed to keep agencies like ours apprised of proposals with impacts which may not seem apparent to those of us not in the Cal/Fed service area and not directly connected to the process.

Sincerely,



Thomas R. Noonan
President, Board of Directors

Cc: ✓ Lester Snow - Executive Director Cal/Fed
Steve Hall - Executive Director ACWA
Catherine Smith - Executive Director CSDA
Sen. Maurice Johannesen - CA State Senate