



HUMBOLDT BAY MUNICIPAL WATER DISTRICT

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JOHN FRIEDENBACH

January 3, 2018

Humboldt County Planning Commission
3015 H Street
Eureka CA 95501

RE: Application Number 10244; Case Numbers ZR-16-001 and SP16-015

Dear Commissioners,

I am writing on behalf of the Humboldt Bay Municipal Water District in regards to the above referenced application. Our District respectfully submits the following information for consideration in regards to the above referenced project.

Our District is adamantly opposed to heavy industrial development adjacent to our source water intake infrastructure located in and along the Mad River for obvious health and safety reasons. Zoning changes that allow heavy industrial operations have the potential to adversely affect the domestic drinking water supply for nearly two thirds of the population of Humboldt County and should be denied. Our interest in this area involves the health and safety needs to protect and preserve the high quality water source that is the Mad River and its underlying aquifers.

As such we are concerned that a change in the zoning of Assessor's Parcel number 504-161-001 from Agricultural General to Heavy Industrial will allow for activities that could potentially adversely affect the water quality in the general vicinity of that parcel. Although the applicant may profess to install adequate control and mitigation measures for this project, they cannot guarantee that any proposed system is not subject to potential failure or human error causing irreparable damage to Humboldt County's largest public drinking water source. Therefore, any zoning change that would allow heavy industrial activities in close proximity puts the drinking water source for two thirds of the County's population in jeopardy and should not be approved.

The District supplies domestic water to seven municipal agencies on a wholesale basis. The municipalities served by the District are the Cities of Arcata, Blue Lake and Eureka, and the Fieldbrook, Humboldt, Manila and McKinleyville Community Services Districts. Via our wholesale relationship, the District serves water to an estimated population of 88,000 people (approximately 66% of the entire Humboldt County), and to numerous businesses, industries and educational institutions.

The District's diversion works and operational control center are located at Essex, just northeast of Arcata on the Mad River and immediately downstream of the Applicant's parcel.

Four Ranney collectors, "Stations", supply water to the domestic system for drinking water purposes. The Ranney collectors house multiple large electric-driven pumps and associated equipment, and are capable of pumping approximately 20 MGD. The collectors draw water from the aquifer via lateral pipes located 60 to 90 feet beneath the bed of the river. The process of bringing water up from the aquifer through the sands and gravel of the riverbed provides a natural filtration process which results in water that is very high in quality. Two of our Ranney collectors, Station 2 to the west and Station 3 to the east, are located on adjacent parcels (APN 516-27-105 and APN 504-15-110 respectively) to the Applicant's parcel. See the attached GIS aerial view of the locations of our adjacent Ranney collectors. Our Ranney Collector Station 1 is located just one thousand five hundred seventy feet downstream of Station 2. Consequently, any contamination originating from the Applicant's parcel would immediately impact up to 3 (75%) of our domestic water supply sources and our industrial surface water source.

Given the location of the project site and the geology underlying it as part of the Mad River aquifer structure, the domestic sewage septic system proposed by the Applicant, will potentially impact our drinking source water. Consequently, again in the interest of public health and safety, our District is opposed to this zoning change and project.

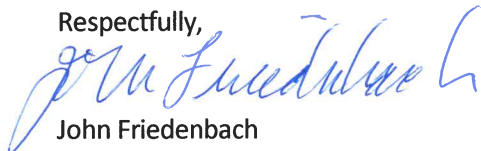
Lastly, the Applicant's parcel is in the 100-year flood zone for the Mad River (FEMA Flood Zones 2017). Any Heavy Industrial activities inundated by a flood have the potential to negatively impact our public drinking water source. Therefore, again in the interest of public health and safety, our District is opposed to this zoning change and project.

There is no public policy justification for this zoning change. There is an ample supply of suitable property located within Humboldt county that is currently zoned Heavy Industrial to which the Applicant may avail themselves and this project. The risks for harmful impacts to our public drinking water source for two thirds of the population of Humboldt County, is not acceptable, and far outweigh the necessity and justification for a zoning change on the Applicant's parcel.

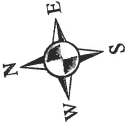
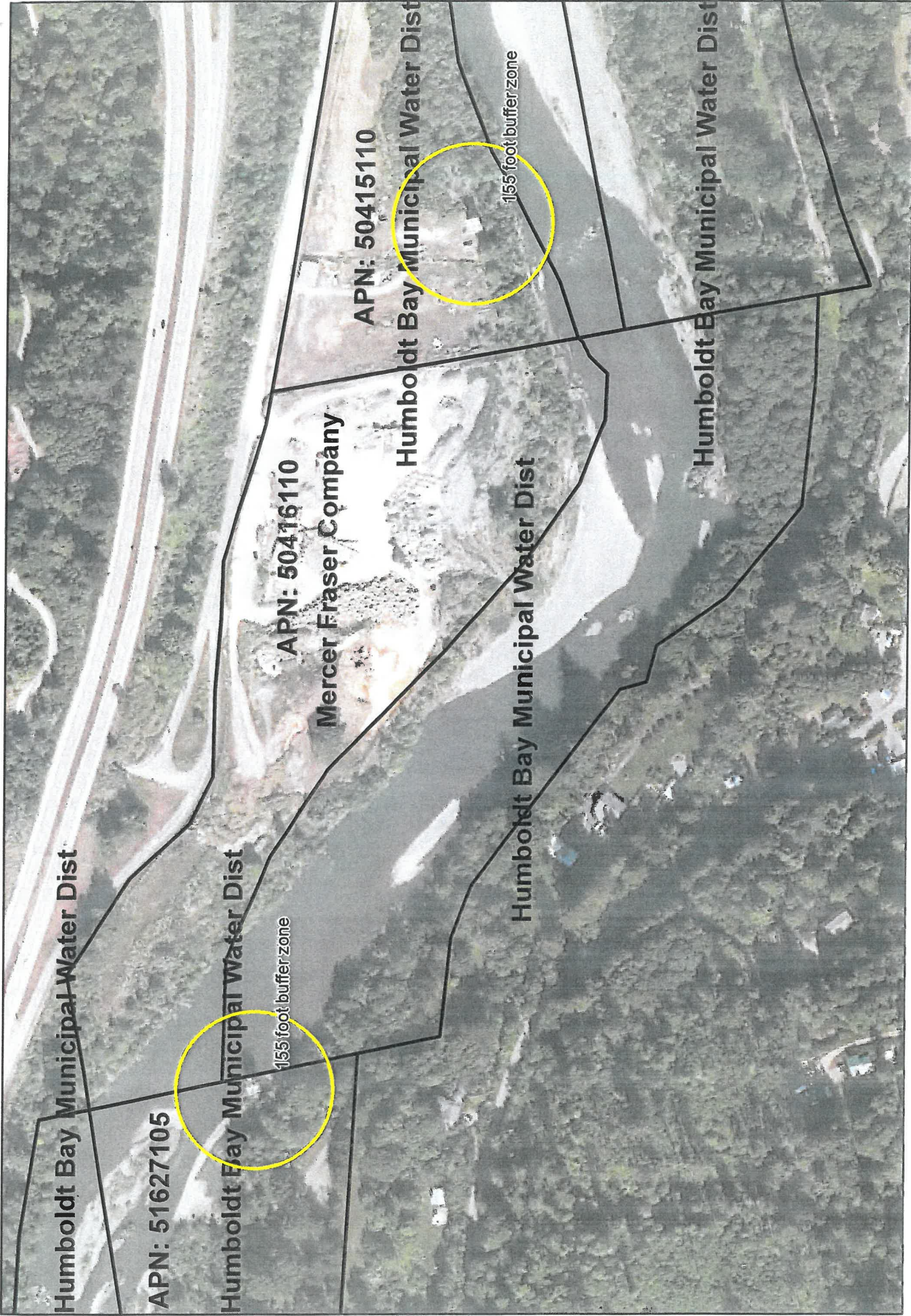
That said, our District is a firm supporter of the Mercer Fraser Company and respect the quality of their workmanship and integrity of the owner and staff. In fact, they were the successful bidder on a multi-million dollar water transmission line with our District recently. That project was completed very successfully. However, the issue before the Commission is protecting the drinking water source for the Humboldt Bay region over increasing private development opportunities

Thank you for your consideration of our submittal.

Respectfully,



John Friedenbach
General Manager



Mercer Fraser APN Map 2018

Distance from PS 2:
PS 1: 1570'
PS 6: 1978'