
Written Coorespondence from Ed Voice
re: GSD Water Service Options to Southern Humboldt Community Park

From: evoice@mchsi.com [mailto:evoice@mchsi.com]
Sent: Sunday, May 07, 2017 3:57 PM
To: Colette Metz <administrator@humboldtlafoo.org>
Subject: Fwd: Southern Humboldt Community Park vs. Garberville Sanitary District

Dear Humboldt LAFCo Commissioners and Staff,

Wanted to know if Humboldt LAFCo has been approached or consulted for the same information as requested below from GSD (Jennie Short) and the State Division of Drinking Water?

Thank you,
Ed Voive

From: Lund, Ronnean@Waterboards
Sent: Friday, May 05, 2017 3:53 PM
To: jmshort@garbervillesd.org
Cc: Hinrichs, Richard@Waterboards; Sutter, Barry@Waterboards
Subject: Fw: Re: Fwd: Southern Humboldt Community Park vs. Garberville Sanitary District

Hi Jennie.

Our September 20, 2016, letter to the Humboldt County Planning Department, which included our comments on the SHCP Draft EIR, states this:

“If it is determined that GSD will supply potable water to future development on the property, then the following list of items should occur, at a minimum:

- 1) The property will need to be annexed into GSD’s service area boundary.
- 2) GSD will need to show that it has adequate source and treatment capacity to serve the intended development.
- 3) GSD’s current Domestic Water Supply Permit has the following condition:

“Garberville Sanitary District shall not allow new service connections to the 8-inch transmission main, constructed as part of Kimtu Meadows Mutual Water Company’s Proposition 50 project, that will reduce the design fire-flow at the Kimtu Meadows subdivision hydrants to below 750 gallons per minute at adequate pressure.”

This means the applicant will need to provide our office with engineering calculations showing that GSD will not be in violation of this permit condition, even if water will not be taken directly off the 8-inch main.”

Regarding Item #1 Above

Whether or not annexation would be required based on the scenario you are proposing, we would want confirmation from the responsible agency(ies) that it is not necessary or that the Park will in fact be annexed.

Regarding Items #2 and #3Above

In order to appropriately address your question below and provide definitive information on what would or would not be required of GSD and the Park, we would need an engineering report, prepared by an engineer registered in California with experience in drinking water treatment, that provides a complete picture of the proposal and proposed operations that includes, at a minimum:

- 1) The amount of water proposed to be treated for the Park, including justification for the amount
- 2) Records showing the amount of water used by GSD for the past five years
- 3) The treatment capacity of GSD's treatment system, including justification
- 4) An evaluation of the potential growth of both the Park and GSD for the next 10 years and an evaluation of how that would affect GSD's treatment plant
- 5) A description of the proposed operations between the GSD's facilities and the Park's facilities
- 6) Initial chemical monitoring for any sources being proposed for use
- 7) A formal source water assessment of any sources being proposed for use, other than the Eel River
- 8) Water rights documentation for any sources being proposed for use
- 9) A description of how fire flow will be handled for the Park's facilities
- 10) Information addressing the issue of any impacts on Kimtu Meadows fire flow, per Item #3 above
- 11) Information concerning what water source(s) the Park would intend to use for irrigation, including quantities
- 12) Operation and maintenance costs for the expansion of the system
- 13) Any technical, managerial, and financial requirements not already include in the report and required by the amended permit process

Some information we can definitively provide now includes:

- 1) If water sources belonging to the Park, other than the Eel River, are proposed for use, it would require, at a minimum: water rights documentation for those sources, initial chemical monitoring of those source, bacteriological monitoring of those sources, and formal source water assessments performed on those sources by a qualified person.
- 2) Garberville Sanitary District would be required to apply for an amended Domestic Water Supply Permit. Here is a link to our webpage regarding Permitting: http://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/Permits.shtml

If you have any questions, please let me know.

Ronnean Lund, Sanitary Engineer/State Water Resources Control Board, Division of Drinking Water/364 Knollcrest Drive, Suite 101, Redding, CA 96002/(w☎) (530) 224-6505/(c☎) (707) 616-5500/(☎fax) (530) 2244844/ ✉ / Ronnean.Lund@waterboards.ca.gov

From: jmshort@garbervillesd.org [<mailto:jmshort@garbervillesd.org>]
Sent: Friday, April 28, 2017 11:41 AM
To: Lund, Ronnean@Waterboards
Subject: Fw: Re: Fwd: Southern Humboldt Community Park vs. Garberville Sanitary District

Good Morning Ronnean,

Below is the response to Ed I sent this morning. I was the one that gave Ralph the idea, and would support GSD contracting with the Park to provide contract water treatment for their raw water instead of them creating a new public water system within our SOI. We have some excess capacity of the treatment plant that could easily cover their minimal potable water needs. It makes sense from the community's perspective. Would SWRCB DDW take issue with that?

Thanks, Jennie

-----Original Message-----

From: jmshort@garbervillesd.org
To: evoice@mchsi.com
Cc: Ralph Emerson <remerson@garbervillesd.org>, Colette Metz <administrator@humboldtlafco.org>
Subject: Re: Fwd: Southern Humboldt Community Park vs. Garberville Sanitary District
Sent: Apr 28 '17 10:09am

Ed,

The problem with your logic in here is that we wouldn't be using GSD water or providing water service. We would merely be contracting to provide treatment of their raw water from the river. It doesn't require an expansion of the POU, annexation, or anything else. The SHCP has riparian water rights to the river and can divert whatever water they need to as long as they put it to beneficial use. Whether they treat it at a plant they construct or we treat it at our plant makes no difference to SWRCB or LAFCo. We wouldn't be providing water service, we would be providing treatment service on their water.

When you state your opinion that "You cannot take their water into your treatment plant and keep it separate from GSD's, as soon as it enters your system, it would become GSD's water." I disagree with you. It would be very simple to keep records to keep it separated.

Jennie

-----Original Message-----

From: evoice@mchsi.com
To: Jennie Short <jmshort@garbervillesd.org>

Subject: Fwd: Southern Humboldt Community Park vs. Garberville Sanitary District
Sent: Apr 28 '17 9:43am

BTW, Here's what I sent Ralph.

Ed

From: evoice@mchsi.com
To: "Ralph Emerson" <remerson@garbervillesd.org>
Sent: Thursday, April 27, 2017 9:38:23 PM
Subject: Southern Humboldt Community Park vs. Garberville Sanitary District

Ralph Emerson, GSD General Mgr,

I just hear what you talked about during the April 25th GSD Board meeting concerning the Southern Humboldt Community Park (SHCP) on KMUD News tonight at 6pm.

You might want to read all the GSD documents about why the SHCP was eliminated from the GSD Annexation and Place of Use back in 2013. Just because someone is in the GSD SOI, does not allow you to provide them treated water; without petitioning the Water Board to expand the GSD Place of Use (400 plus acres) and who is going to petition Humboldt LAFCo to annex 400 plus acres into the GSD District Boundary? Let alone the CEQA initial study and the fact the GSD CEQA MND's for the New Water Treatment Plant and Annexation both state these projects would not induce growth. Providing the SHCP treated water would and is inducing growth with your system.

Just so we are clear, the SHCP has stated in their project EIR, the Park currently serves 46,000 visitors annually and the same EIR is approved to allow up to 800 people per day year round 24/7 365 days a year, so do the math. That's 292,000 people annually. More than 24,000 people per month. How much water could these people use? And if you are only talking about water from the SHCP spring that fills their 55,000 tank, its restricted with CDFW and can only be diverted from November 1st to July 1st each year. What happens between July 2nd to October 31 when they cannot use that spring? Would they use 100% GSD water?

And what about the 5 events a year for up to 2500 people and the 2 day festival once a year for up to 5000 people. That's 17,500 more people per year. And oh yeah, the Garberville Rodeo is moving down to the SHCP. You need to add this water consumption to the mix.

You cannot take their water into your treatment plant and keep it separate from GSD's, as soon as it enters your system, it would become GSD's water.

You might want to contact the GSD attorneys that suggested you not annex the SHCP back in 2013. The last thing you want is me making public comments, it tends to make everything more expensive for everyone...

<http://www.redwoodtimes.com/article/ZZ/20131002/NEWS/131007748>

Ed Voice