



City of Healdsburg

City Manager's Office

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State Water Resources Control Board

Attention: Jessica Bean

Post Office Box 100

Sacramento, CA 95812-0100

and

Via email to: Jessica Bean

The City of Healdsburg appreciates the ability to provide comment on the State Water Resource Control Board's (SWRCB) April 18, 2015 proposed regulatory framework for implementation of a statewide 25% reduction in potable water use.

The City of Healdsburg serves water to a population of just less than 12,000 and provides wholesale water to the Fitch Mountain Water District (County Service Area 41). The City supplies water through three water rights on the Dry Creek and Russian River. Both the Russian River and Dry Creek are fed from the Coyote Dam and Warms Springs Dam respectively. Due to significant rain events over the past few months, these reservoirs are at 68% and 88% of capacity.

In 2014, the State Water Resource Control Board called upon "all water suppliers to accelerate the completion of projects that will conserve potable water by making use of non-potable supplies, such as recycled water" (Resolution 2014-0038). To that effort, the City promptly initiated a recycled water program that could irrigate as much as 600 acres of agricultural land and help alleviate the drought's impact on the local region. During 2014, the City was able to provide 5.9 million gallons of recycled water, conserving an equal amount of potable water.

The City plans to continue and expand the supply of recycled water throughout 2015; however since these potable water offsets are not within the City's service territory, this laudable conservation effort is not recognized in the State's monthly conservation reports. The City feels strongly that any increase in water supply developed within the hydrologic region should be reflected in the conservation efforts of that urban water supplier and urges the SWRCB to reconsider their opinion and counting of recycled water programs.

In reviewing both the adopted and proposed water conservation regulations in the California Code of Regulations, title 23, section 865; the City notes that it incorrectly included its wholesale water sales within the monthly production numbers submitted for 2014 and 2013. Additionally, the months of June, July, August, and September of 2014 incorrectly reported 2010 census data rather than the more accurate 2013 census data. The City will make these corrections through the DRINC portal, thereby lowering the City's summer average Gallons per Capita per Day (GPCD) to 127. With this correction, the City of Healdsburg will fall into Tier 6 requiring a

conservation rate of 24% based on the proposed language. If the State Water Control Board does not agree with this change please respond in writing stipulating your concerns.

In closing, the City of Healdsburg takes the current drought conditions very seriously and has dedicated a significant amount of staff time and resources to water conservation over the past 18 months. In total, the City has spent roughly 25% of its average annual revenues toward water conservation programs, including recycled water projects. The effect of these efforts is that the City has reduced its summer average GPCD by 17%, reduced its irrigation in City Parks by over 35%, and built a strong platform to increase the regional supply of water through the promotion of recycled water. The City plans to continue these efforts throughout 2015 but urges the SWRCB to consider the accounting of recycled water programs within the hydrologic region before adopting the proposed regulations.

Sincerely,



David Mickaelian
Healdsburg City Manager
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cc: Shaun McCaffery, Mayor of Healdsburg
Terry Crowley, Utility Director
Robin Donoghue, City Attorney

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