

January 28, 2016

Kathy Frevert State Water Resources Control Board 1001 I Street, 24th Floor Sacramento, CA 95814

Ms. Frevert:

The City of Susanville is appreciative of the work the Water Board has completed in responding to the Emergency Drought Regulations. The City of Susanville has been placed in the 36% tier and the inclusion of the climate adjustment in the proposed regulation provides a 3% decrease in our conservation requirement. While the relief is needed, it is significantly short of what is appropriate or reasonable for our community. Over the past year, the City of Susanville has provided comments at every opportunity. In addition, we have done our part and have worked diligently to comply with the existing regulation. At this time, it appears that our comments have not had an impact on the regulations. What we are requesting specifically is consideration to be placed in the 4% reserve tier, based on the insignificant impacts of the drought on our community water supplies.

Susanville has abundant water supplies for existing and future population growth. We also have the ability to quickly increase water production by simply capturing existing spring water at our collection facilities and are being unduly penalized and ineligible for the reserve tier simply because we have not had the need to create surface water storage. Susanville experiences drought like conditions year round as it is located in the high desert and we are well prepared for extended periods of drought and we ask that you consider these facts and reclassify our community. Susanville lies within a remote, geographically isolated, closed ground water basin, on the eastern side of the Sierra Nevada range, which contains over 10 million acre feet of water storage.

Governor Brown's Executive Order B-36-15 calls for an extension, should drought conditions persist. Although, we understand the statewide significance of the drought, we cannot factually make findings to support that our water supplies have been significantly impacted by the drought.

Please consider fixing the reserve tier requirements to include a reasonable and logical assessment of relevant attributes of a community water system. Which include population, groundwater storage, spring water supplies, and geographic factors.

Sincerely,

Jared G. Hancock City Administrator