



# City of Susanville

(530) 257-1000 • 66 North Lassen Street • Susanville, CA 96130-3904

## LATE COMMENT

May 4, 2015



Jeanine Townsend  
Clerk to the Board State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Subject: Comment Letter – Emergency Conservation Regulation

Ms. Townsend:

The City of Susanville respectfully submits the following comments regarding the proposed emergency regulation. The Board has requested feedback on whether the regulation should allow water suppliers whose supplies include groundwater to apply for inclusion in the 4% reserve tier if it can be demonstrated that they have a minimum of 4 years of supply, do not rely upon imported water, and their groundwater supplies recharge naturally. In response to the Board's request, please consider the following information regarding the City of Susanville. It is likely that other remote, rural, mountain communities share similarities. We strongly request that ground water supply be included when assessing eligibility for the 4% reserve category.

The City of Susanville lies within the Honey Lake Valley Groundwater Basin, on the eastern side of the Sierra Nevada mountain range. The City operates a small municipal water system with fewer than 4000 connections. The Honey Lake Groundwater Basin is remote and isolated. The area is accustomed to low annual average rain fall however, there is an abundance of water to serve our small population for several years. The drought has not had a significant impact on Susanville's water sources. We closely monitor our water supplies and to date, the proposed regulations place the City of Susanville in tier nine at the 36% conservation mandate. The City of Susanville is supplied by two natural springs and four ground water wells. Six months of the year the springs produce more water than the City needs. Good clean potable water overflows our holding tank into a storm drain and down the hill into a local drainage system. In the summer months, all of the spring water currently being collected (65% of total spring capacity) is put to beneficial use. The proposed regulations would require the City's average daily water use to be less than that which the springs produce, even in the summer months when outdoor watering occurs, potable water will overflow storage tanks the majority of the year. This water will be lost to beneficial use.

The Honey Lake Valley Groundwater Basin is a low priority basin that has adequate ground water supply to meet its agricultural, industrial, and municipal needs for well over 4 years. Per DWR's ground water bulletin 118, the Honey Lake Valley stores more than 10 million acre feet of water, of which only 69,500 acre feet is used annually. The basin recharges naturally and quickly when precipitation occurs.

**Brian R. Wilson**  
Mayor  
**Nicholas B. McBride**  
Mayor pro tem

**Councilmembers:**  
**Lino P. Callegari**  
**Rod E. De Boer**  
**Kathie Garnier**

The City of Susanville values its water as a precious resource and continuously monitors spring collection. City residents have been very responsible when called upon to conserve water in the past. As long as the water shortage is real and proper communication is made, Susanville residents are very responsive. There is a concern that an aggressive conservation campaign, if conducted with a community perception that the need for aggressive conservation does not exist, will cause our agency to lose credibility with our customers and we will not receive a favorable response when there is an urgent need to conserve.

The City of Susanville has additional capacity available. The City does not collect all of its available spring water at the source and has adjudicated rights to surface water from the Susan River. Several projects are being considered to increase storage and enhance spring collection. These projects will reduce the need for the City to pump ground water in the summer months.

As a community listed as disadvantaged under the DWR's definition, the availability of water has allowed the City to keep rates low for our customers over the years. The loss in revenue created by the conservation mandate would need to be recovered, which would place a burden on the residents of our small disadvantaged community.

In conclusion, there has not been a significant decrease in Susanville's spring production during the drought. Due to the low population in the Honey Lake Valley Groundwater Basin, the abundance of ground water in storage, the isolation of the basin and the manner in which ground water recharge occurs, an eminent and aggressive conservation need does not exist. It is likely that other rural mountain communities are in a similar situation. Please consider including groundwater supply when assessing eligibility for the 4% reserve tier.

Sincerely,



Jared G. Hancock  
City Administrator



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