



City of Susanville

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

January 6, 2016

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

Ms. Frevert:

The City of Susanville respectfully requests that the following provisions be included in the regulatory water conservation framework that is being created in response to Governor Brown's Executive Order B-36-15 for water conservation through October 31, 2016.

- Allow for a One to One water conservation credit for groundwater production from non-mechanical means with supporting evidence that sustainable supplies exist and have not been impacted by drought conditions.
- Creation of an appeal procedure that would allow communities in desert and semi-arid communities with documented water supplies to be included in the Reserve Tier.
- Revising Reserve Tier parameters to allow for the inclusion of groundwater reserves in Low Priority Basins as defined by the State Water Board.
- Provide for a distinction of groundwater production from non-mechanical means and groundwater production from mechanical means. Allow conservation requirement to apply to only groundwater production by mechanical means.

The City of Susanville is committed to joining with the State to ensure that water is used in a prudent manner that ensures sustainable growth and adequate conservation to withstand extended periods of drought. We have been extremely proactive in implementing our water conservation mandates and our community has been incredibly responsive to our water conservation requests. Due to the excess water supplies in our region and by securing water supplies that can accommodate growth many decades into the future we have not had a need to develop extensive surface water storage (not ideal in our climate). We have a small population of approximately 9,000 persons in an isolated hydrologic region with abundant ground water. The majority of the City's water supply is collected non-mechanically and yet we have been placed in the highest tier (36%) for conservation. We were very understanding when blanket regulations were created during the peak of a state wide drought but, we request consideration that our area be addressed more thoughtfully in the regulations at this time. The economic and social impacts of

Brian R. Wilson
Mayor
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Mayor pro tem

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

these regulations have been devastating to our small, disadvantaged community and we urge you to take the time to consider these requests. We understand that this is a very complex matter and would welcome the opportunity to discuss any and all of these requests in more detail.

Sincerely,



Jared G. Hancock
City Administrator



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