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FRANK ZERUNYAN  
*Council Member*  
DOUGLAS R. PRICHARD  
*City Manager*



CITY OF  
**ROLLING HILLS ESTATES**  
4045 PALOS VERDES DRIVE NORTH • ROLLING HILLS ESTATES, CA 90274  
TELEPHONE 310.377.1577 FAX 310.377.4468  
[www.ci.Rolling-Hills-Estates.ca.us](http://www.ci.Rolling-Hills-Estates.ca.us)

January 5, 2016

Kathy Frevert, Specialist  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100

Via Email & US Mail

Re: Comments on Proposed Regulatory Framework

Dear Ms. Frevert:

Thank you for the opportunity to comment on the Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation. Since June 1, 2015, the Palos Verdes District of California Water Service, which encompasses four cities on the Palos Verdes Peninsula, as well as unincorporated areas of the County of Los Angeles, has been mandated to reduce its water use by 36% so that California can meet a 25% statewide water conservation objective. While our community has strived to meet this goal and has made significant progress, the mandate is very restrictive and has not taken into account the unique character of the City, which could have a serious adverse impact to public safety. As regulations are reviewed, we appreciate the Board's consideration of relief to the Palos Verdes District and like-communities.

As identified in the Multijurisdictional Hazard Mitigation Plan of the cities of Rancho Palos Verdes and Rolling Hills Estates, these jurisdictions, along with neighboring Palos Verdes Estates and Rolling Hills, are considered a Very High Fire Hazard Severity Zone and has been deemed as such by the California Department of Forestry and Fire Protection (Cal Fire) and the Los Angeles County Fire Department. The Multijurisdictional Hazard Mitigation Plan for our area identifies the likelihood of a fire as over 3 on the Calculated Priority Risk Index (CPRI). As a measure of comparison, the likelihood of a 7.8 magnitude earthquake on the San Andreas Fault is slightly over 2.5 on the CPRI. The CPRI identifies the following for a wildfire threat to our area:

Probability:	Likely
Magnitude/Severity:	Critical
Warning Time:	Less than 6 hours
Duration:	Less than one week

With many steep canyons and open scrub-covered hillsides this area has always been vulnerable to hazards associated with brush fires burning anywhere from 15 acres in a more recent fire in Rancho Palos Verdes to up to 4,000 acres dating back to 1923.

Reductions in residential irrigation increases the amount of combustible fuel in the event of a wild fire. While the community understands and supports the need to reduce water usage during the drought, it is imperative that we do so while preserving public safety. Because of its high fire hazard, Los Angeles County Fire Department advises Palos Verdes Peninsula residents “to continue to judiciously water plants and ornamental vegetation” as written in a letter dated August 21, 2015 to constituents (attached).

As the Board and the Legislature review the mandate, we hope they will consider the following:

1. Modify the formula, allowing a 4% reduction in the existing mandated conservation as currently proposed for drier regions, to regions like the Palos Verdes District where combined vegetative, geological and topographical conditions cumulatively result in recognized fire and erosion hazards.
2. Consider a specific formula for new residents. The allocation of water budgets based on 2013 usage has been challenging for new residents, growing families, and large properties. Specifically, the formula, singularly based on per capita historical usage, does not take into account unique residential conditions such as home size, lot size and demographics. Although an appeals process exist and our water purveyor (California Water Service Company) has been responsive to such appeals, “one size does not fit all” in regard to a 36% mandate and per capita formula.
3. Appropriate more funds for water conservation rebates.
4. Make funds available to cities to address dying trees and vegetation impacted by the drought and pest infestation, which ultimately increase fuel for potential fires;
5. Make funds available for recycled water infrastructure. Currently, there are no recycled water systems on the Palos Verdes Peninsula because it is cost-prohibitive. Having the ability to use recycled water could significantly help reduce the reliance on potable water.

Thank you again for the opportunity to comment on the Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation. We look forward to hearing the Board’s response to our comments. If you have any questions, please contact me at (310) 377-1577.

Sincerely,



Douglas R. Prichard  
City Manager

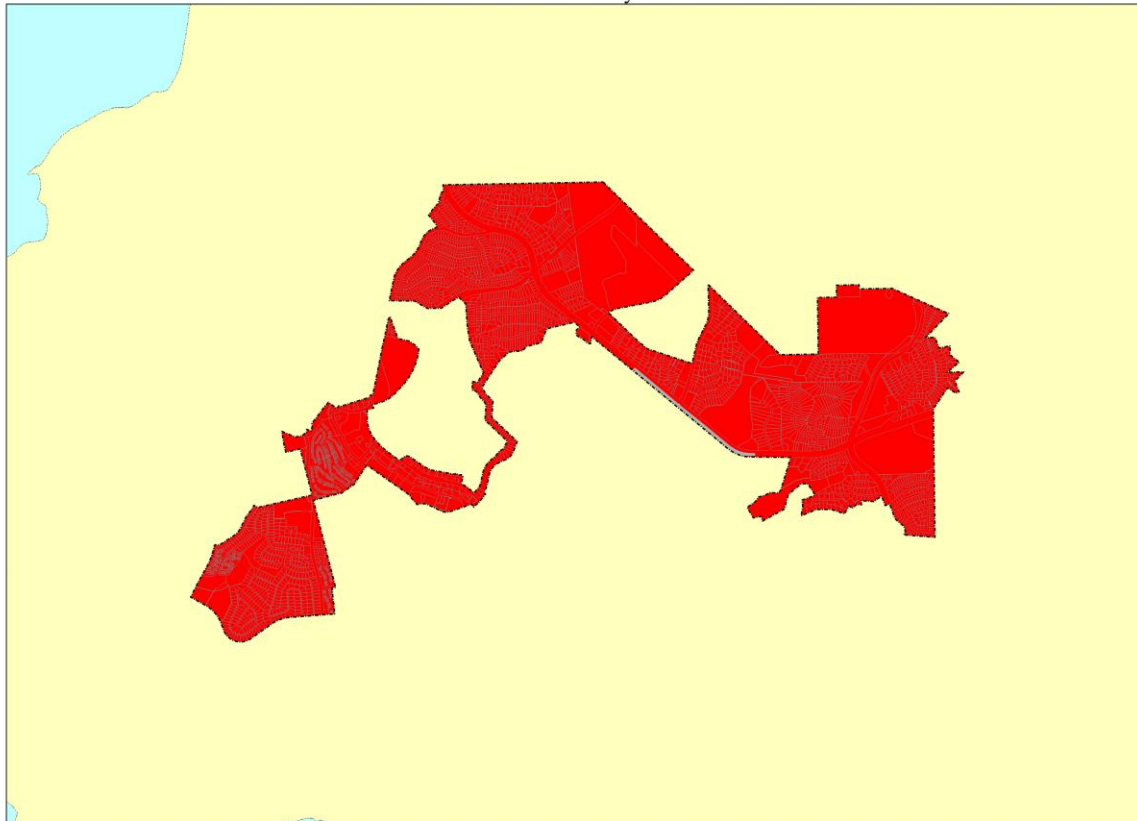
cc: Rolling Hills Estates City Council  
Anton Dahlerbruch, Palos Verdes Estates  
Doug Wilmore, City Manager, Rancho Palos Verdes  
Ray Cruz, City Manager, Rolling Hills  
William Mayfield, Battalion Chief, Los Angeles County Fire Department  
Dan Trejo, Acting District Manager, Cal Water



City of RHE- Very High Fire Hazard Severity Zones  
 (Source: [ftp://frap.cdf.ca.gov/fhszlocalmaps/los\\_angeles/rolling\\_hills\\_estates.pdf](http://frap.cdf.ca.gov/fhszlocalmaps/los_angeles/rolling_hills_estates.pdf))

# Rolling Hills Estates

Very High Fire Hazard Severity Zones in LRA  
 As Recommended by CAL FIRE



**Fire Hazard Severity Zones**

Legend:

- Very High Fire Hazard Severity Zone (Red)
- High Fire Hazard Severity Zone (Light Red)
- Low Fire Hazard Severity Zone (Light Yellow)
- Very Low Fire Hazard Severity Zone (Yellow)

Other symbols:

- City Boundary (Dashed line)
- Parcel (Thin grey lines)
- County Boundary (Dotted line)

This map was developed using data products such as parcel and city boundaries provided by local government agencies. In some cases, this includes copyrighted geographic information. The risks are for sharing purposes only. Questions and requests related to parcel or city boundary data should be directed to the appropriate local government entity.

California State Albers, NAD 1983  
 Scale 1:12,000  
 at 36" x 50"  
 September 2011

The State of California and the Department of Forestry and Fire Protection make no representations or warranties regarding the accuracy of data or maps. Neither the State nor the Department shall be liable under any circumstances for any direct, special, incidental, or consequential damages with respect to any claim by any user of third party on account of, or arising from, the use of data or maps.

Obtain FRAP maps, data, metadata and publications on the Internet at <http://frap.cdf.ca.gov>  
 For more information, contact CAL FIRE-FRAP, PO Box 842646, Sacramento, CA 95844-2640, (916) 327-3939.

Jerry Brown, Governor,  
 State of California  
 John Lavin, Secretary for Resources,  
 The Natural Resources Agency  
 Ken Penick, Director,  
 Department of Forestry and Fire Protection

MAP ID: Rolling\_Hills\_Estates  
 DATA SOURCES:  
 CAL FIRE Fire Hazard Severity Zones (FHSL00\_1)  
 CAL FIRE Very High Fire Hazard Severity Zones in LRA - Los Angeles (19n4c0E\_5)





COUNTY OF LOS ANGELES  
FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE  
LOS ANGELES, CALIFORNIA 90063-3294

Agenda Item No: 9-C  
Mtg. Date: 09/14/15

RECEIVED

AUG 27 2015

City of Rolling Hills  
By \_\_\_\_\_

DARYL L. OSBY  
FIRE CHIEF  
FORESTER & FIRE WARDEN

August 21, 2015

Dear Residents:

Southern California continues to be one of the most desirable places on earth to live. However, many challenges, including longer and warmer summers, fast-moving powerful storms, and an on-going drought continue to challenge our ability to live safely in the wildland-urban interface areas of Los Angeles County.

The combined effect of years of drought, high temperatures, low humidity, and dry Santa Ana winds have the potential to cause devastating consequences during our fall fire season. As the numerous fires that have impacted Northern California have proven, any fire that gets established near homes will quickly threaten lives and property.

The four year drought has forced all of us to cut back on water usage. However, we would like to encourage those who reside in the wildland-urban interface to continue to judiciously water plants and ornamental vegetation in accordance with your local water restriction ordinances. Proper maintenance and removal of dead material is equally important as it only takes a single ember to ignite dry vegetation.

The Los Angeles County Fire Department continues to take every precaution to protect you and your home from wildfire. In the event of a major fire, firefighting resources will be stretched thin. You can prepare for the upcoming fire season by developing a Ready! Set! Go! Personal Wildfire Action Plan.

The Ready! Set! Go! Personal Wildfire Action Plan is available on our website and provides guidance on retrofitting your home with fire-resistive features, creating defensible space around your home, and developing an emergency plan should your home be threatened by a wildfire and you need to evacuate.

You play a vital role in protecting your life, the lives of your loved ones, and property. Through advance planning and preparation, we can all be ready for the next wildfire. For more information, please visit our website at [www.fire.lacounty.gov](http://www.fire.lacounty.gov), our Facebook page at [www.facebook.com/LACOFD](http://www.facebook.com/LACOFD), or call our public information team at (323) 881-2411.

Stay safe,

DARYL L. OSBY, FIRE CHIEF

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS  
ARTESIA  
AZUSA  
BALDWIN PARK  
BELL  
BELL GARDENS  
BELLFLOWER  
BRADBURY

CALABASAS  
CARSON  
CERRITOS  
CLAREMONT  
COMMERCE  
COVINA  
CUDAHY

DIAMOND BAR  
DUARTE  
EL MONTE  
GARDENA  
GLENORA  
HAWAIIAN GARDENS  
HAWTHORNE

HIDDEN HILLS  
HUNTINGTON PARK  
INDUSTRY  
INGLEWOOD  
IRVINDALE  
LA CANADA FLINTRIDGE  
LA HABRA

LA MIRADA  
LA PUENTE  
LAKEWOOD  
LANCASTER  
LAWDALE  
LOMITA  
LYNWOOD

MALIBU  
MAYWOOD  
NORWALK  
PALMDALE  
PALOS VERDES ESTATES  
PARAMOUNT  
PICO RIVERA

POMONA  
RANCHO PALOS VERDES  
ROLLING HILLS  
ROLLING HILLS ESTATES  
ROSEMEAD  
SAN DIMAS  
SANTA CLARITA

SIGNAL HILL  
SOUTH EL MONTE  
SOUTH GATE  
TEMPLE CITY  
WALNUT  
WEST HOLLYWOOD  
WESTLAKE VILLAGE  
WHITTIER