



CITY OF  
*Palos Verdes Estates*

OFFICE OF  
THE CITY MANAGER

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 “Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation.” Since June 1, 2015, Palos Verdes Estates has been mandated to reduce its water use by 36% so that California can meet a 25% statewide water conservation objective. The mandate is having an impact on the community character and it affects public safety. In turn, relief through the extension of the regulations would be appreciated.

Palos Verdes Estates is identified as a Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (Cal Fire). Therefore, reductions in residential irrigation increases the amount of combustible fuel in the event of a wild fire. This point is important in context with (1) our vast parkland open space, comprising approximately 28% of the City, (2) native habitat in our canyons and on our hillsides that are being stressed by the lack of water and pest infestation, (3) the Palos Verdes Peninsula being located on bedrock where surface water does not percolate into the ground and runoff contributes to slope instability and soil erosion, and (4) the topography within Palos Verdes Estates that necessitates trees, brush and landscapes to stabilize open space.

Additionally, 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 exists 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.

January 4, 2016  
Page Two

In conclusion, the Board and the Legislature are encouraged to consider the following:

1. Appropriate more funds for water conservation rebates;
2. Consistent with the Governor's existing Emergency Declaration, make funds available to cities for addressing the parkland trees and vegetation impacted by the drought and pest infestation;
3. Increase the funding available for constructing an infrastructure for the distribution of recycled water; and
4. Modify the formula, extending the 4% reduction in mandated conservation, to regions like the Palos Verdes Peninsula where combined vegetative, geological and topographical conditions (not just climatic conditions) cumulatively result in recognized fire and erosion hazards.

Thank you 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) 378-0383.

Sincerely,



Anton Dahlerbruch  
City Manager

- c: Palos Verdes Estates City Council  
Ray Cruz, City Manager, City of Rolling Hills  
William Mayfield, Battalion Chief, Los Angeles County Fire Department  
Doug Prichard, City Manager, City of Rolling Hills Estates  
Dan Trejo, Acting District Manager, Cal Water  
Doug Willmore, City Manager, City of Rancho Palos Verdes