

January 5, 2016

VIA ELECTRONIC MAIL  
Kathy.Frevert@waterboards.ca.gov

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

**SUBJECT: Comments on Proposed Regulatory Framework**

Dear Ms. Frevert:

I write to you on behalf of the citizens and City Council of the City of Rancho Palos Verdes in response to the request for comments on the Proposed Regulatory Framework for Extended Emergency Regulation for Urban Water Conservation. We understand that the Board wishes to receive comments on the Framework by January 6, 2015.

Rancho Palos Verdes is one of four (4) cities on the Palos Verdes Peninsula in Los Angeles County that are served by California Water Service Company (CalWater). Previous objections raised regarding the 36-percent reduction target for CalWater's Palos Verdes service area were rejected by the Board and the Office of Administrative Law (OAL) in their approval of Sections 863-866 in Title 23, Article 22.5 of the California Code of Regulations. However, the City of Rancho Palos Verdes believes that there are many unique circumstances applicable to Rancho Palos Verdes that warrant reconsideration of the 36-percent reduction target:

- Substantial portions of Rancho Palos Verdes are zoned for large-lot residential development and horse keeping. Many property owners in these areas of the City keep horses or other large domestic animals, and some also cultivate crops for their personal consumption on areas of up to an acre, both of which are semi-rural activities that the City permits and encourages. Maintaining the 36-percent reduction target would diminish the semi-rural quality of life that characterizes a large portion of Rancho Palos Verdes.
- Nearly the entirety of Rancho Palos Verdes is identified as a Very High Fire Hazard Severity Zone on maps prepared by the California Department of Forestry and Fire Protection (CalFire). Reductions in residential irrigation have the potential to substantially increase the amount of combustible fuel in the event of wild fire. The City and the Palos Verdes Peninsula have experienced many devastating wild fires

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over the past few decades. Maintaining the 36-percent reduction target would threaten the safety of the City and its residents.

- Rancho Palos Verdes has already taken steps to conserve water in the past. In 2010, we adopted our own Water Efficient Landscape Ordinance, based upon the State's model ordinance at that time. In addition, the data presented by the Board in support of its current regulations demonstrated that CalWater's Palos Verdes service area had achieved a 4-percent reduction in potable water consumption between 2013 and 2014, a fact that was not acknowledged in the setting the 36-percent reduction mandated in the current Framework.

The City appreciates that the Board is considering revisions to the Framework to address unique criteria and circumstances that apply to some California cities and communities. I respectfully suggest that the cities of the Palos Verdes Peninsula deserve similar consideration.

Thank you very much for considering the concerns of the City of Rancho Palos Verdes and its citizens. If you have any questions, please contact Senior Administrative Analyst Kit Fox at (310) 544-5226 or [kitf@rpvca.gov](mailto:kitf@rpvca.gov).

Sincerely yours,



**Doug Willmore**  
City Manager

cc: Mayor Ken Dyda and Rancho Palos Verdes City Council  
Gabriella Yap, Deputy City Manager  
Kit Fox, Senior Administrative Analyst  
Daniel Trejo, Acting District Manager, CalWater's Rancho Dominguez District  
Anton Dahlerbruch, City of Palos Verdes Estates  
Raymond Cruz, City of Rolling Hills  
Doug Prichard, City of Rolling Hills Estates