



PATRICK J. FUREY  
MAYOR

# CITY OF TORRANCE



April 27, 2015

Felicia Marcus, Chair  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

Dear Chair Marcus:

Thank you for the opportunity to comment on that State Water Resource Control Board (SWRCB) Draft Drought Emergency Water Conservation Regulations. The City of Torrance appreciates the SWRCB efforts to solicit local water agency input on these pending regulations. The City of Torrance is committed to reducing potable water use in our community to meet unprecedented statewide drought conditions.

While supportive of the SWRCB's draft regulations, the City of Torrance has the following comments regarding our concerns and other considerations that we believe should be taken into account in establishing reduction targets and implementation of these regulations:

- 1) **Credit for Recycled Water** – Torrance Municipal Water (TMW) uses approximately 27,000 acre feet (AF) of water annually. Of this amount, on average 6,500 AF is recycled water that is delivered to the ExxonMobil Refinery for process water requirements and landscape irrigation. In addition to ExxonMobil, TMW provides recycled supplies to 35 other customers for landscape irrigation purposes. All of the recycled water use displaces water formally derived from potable water sources, and we believe that this factor should be recognized in establishing the SWRCB water reduction targets.
- 2) **Credit for Groundwater and Groundwater Desalination** – On an annual basis TMW derives approximately 3,600 AF of potable water from these two local sources, which equates to about 18% of total potable demand. The use of both local sources offsets an equivalent amount of potable use, and this factor should be recognized. The groundwater desalination plant (Goldsworthy Desalter) extracts saline groundwater and converts it into a potable source. This is “recovery project” from a non-potable source, and if the Desalter was not in operation, an equivalent amount of potable water from imported sources would need to be purchased. In addition, the groundwater pumped by TMW is derived from recycled water which is pumped into a series of wells that form fresh water barrier to prevent further intrusion of seawater into the local groundwater basin. This “barrier water” flows underground and 10 to 20 years later becomes the principal water source for our groundwater wells.
- 3) **Flexibility on Watering Days – Equivalency Factor** – The SWRCB draft regulations limit outdoor to two days per week. In our Conservation Ordinance, the City is proposing an **equivalency provision** which meets the intent of the draft regulations but provides

for needed flexibility in implementation. Torrance Conservation Ordinance has other limitations that are not included in the SWRCB regulations, including limitations on watering times and duration. Certain areas in Torrance have extremely expansive soil which requires more frequent watering at low volumes to maintain constant moisture content to prevent the foundation damage caused by expansion and contraction of soil. In addition, certain soil conditions and slopes contours of various properties require more frequent watering than two days per week, but with shorter duration of time to maintain vegetation.

- 4) **Enforcement/Penalties** – In 2009 Torrance enacted its current Conservation Ordinance which prohibits wasteful water uses and places certain restrictions on water uses, particularly outdoor watering on a permanent and continuous basis. Monitoring is through a web-based citizen-reporting system and observations made by personnel in the field. Enforcement is primarily through the issuance of water-wasting door hangers, warning letter, site visitations and counseling of violators. The SWRCB draft regulations provide for the levying of substantial fines/penalties to cities for not meeting certain requirements. We believe this needs additional clarification.
- 5) **Single Large User** – The ExxonMobil Refinery use approximately 2,500 AF of potable water annually in addition to over 6,000–6,500 AF of recycled water for its process water requirements. Although about 75% of the refinery's water needs are met from recycled supplies, the balance of their water requirement are from TMW potable water deliveries, which cannot be converted to recycled water at this time. This represents 12–15% of TMW potable demand which cannot be reduced. In the SBx-7 2020 plan, large single use requirements were taken out of the formula to meet 2020 GPCD targets, and this factor also needs to be recognized in the setting the SWRCB reduction targets.
- 6) **Daytime Population** – Although Torrance has less than 150,000 full time residents, the City's daytime populations swells to 500,000 because it is a major business, job and shopping center for the South Bay region. When calculating the residential gallons per capita per day (R-GPCD) this factor should be a consideration. Again we wish to thank the State Water Resources Control Board for affording the City of Torrance the option to provide our input into this process, and welcome the opportunity discuss our concerns with the SWRCB board members and staff.

Please do not hesitate to contact Rob Beste, Public Works Director, at 310-618-6258 should you have any questions.

Sincerely,



Patrick J. Furey, Mayor