



City of Rolling Hills

INCORPORATED JANUARY 24, 1957

NO. 2 PORTUGUESE BEND ROAD
ROLLING HILLS, CALIF. 90274
(310) 377-1521
FAX: (310) 377-7288

May 4, 2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



RE: Comment Letter - Emergency Conservation Regulation

Dear Ms. Townsend,

I am writing to the Board on behalf of the City of Rolling Hills to vehemently oppose the State Water Resources Control Board's Proposed Emergency Regulation concerning Drought Emergency Water Conservation. The City knows the Board is dealing with a serious environmental emergency in order to conserve water in a severe drought condition Statewide, but the Proposed Emergency Regulation needs to be amended to assist municipalities such as Rolling Hills.

The 36% reduction requirement for the City of Rolling Hills is very onerous and could be hazardous to our residents and their livestock. Rolling Hills is a unique rural and equestrian community in Los Angeles County with a population of only 1,860 residents, based on the 2010 census. Our city has less than 800 residences and no commercial businesses. Rolling Hills' water is provided by the California Water Service Company within its Palos Verdes District. Almost all the parcels in Rolling Hills range between 1 to 12 acres in size. It is obvious that a household in Rolling Hills will use more water than almost any other household in the State. To group our residents' per capita water usage to all other urban and suburban communities is simply not comparable and is unfair.

The entire City of Rolling Hills is zoned as "Residential Agricultural" where every household by right can farm on their land. Many of our residents have planted vineyards, orchards and vegetable plots that create in itself high water usage per capita. Within Sec. 865(e) of the Proposed Emergency Regulation, you allow water suppliers to credit themselves for commercial agricultural uses. Residential farmers such as those in Rolling Hills should get a similar credit by reducing the overall percentage requirement for the entire City. If not, you will put a damper on local food supply sustainability and destroy a very important local resource.

The City of Rolling Hills' entire history is based on its equestrian lifestyle and heritage. Every parcel in Rolling Hills is required to have an area for a horse stable and corral. Between the City and the Rolling Hills Homeowners Association, they own and operate two municipal corrals which are used to provide the required exercise for horses. Therefore, taking care of horses and other farm animals is commonplace in Rolling Hills. It takes a great deal of potable water to care for farm animals, particularly for their drinking water during the hot summer months, so that these animals remain healthy. These

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necessities cannot be compared to most urban households and cutting back water for livestock and equestrian uses is not possible.

The State of California has declared the entire City of Rolling Hills to be located in a Very High Fire Severity Zone. With the right conditions, our entire City can burn down by wildfire. The City already has concerns about certain households who have cut back their watering of vegetation around their home, which is causing this vegetation to die and making it more susceptible to wildfire. The City believes it is dangerous that the Board require residents in extremely high fire zones to cut any water to the plants surrounding residents' homes. Such plants provide firebreaks only when they are still alive due to proper irrigation.

Since the City has already implemented best practices in water conservation measures, it will be difficult for our residents to cut much more of their water usage. The City in 2013 adopted the California Housing and Community Development "CAL Green" code for water efficiency and conservation for both outdoor and indoor uses. Also, the City amended its municipal code by adopting the Water Efficient Landscape Ordinance. Finally, since our residents have already been paying such large bills due to their large lots with varied uses, they have on their own installed very expensive water conservation devices and have cut back on their personal water use. So requiring these residents to cut another 36% is simply not feasible and is penalizing them for their water conservation efforts.

A final point is that the Regulation is not consistent with the recent legal case involving the City of San Juan Capistrano. Any water rate structure, fee or fine must be commensurate with the cost of providing the water service.

Due to all the above stated facts and circumstances, the City of Rolling Hills believes that it deserves the least onerous water reduction requirements. We are requesting a citywide reduction requirement of only 8%.

If you have any questions regarding this letter or about our community, please contact me at (310) 377-1521.

Sincerely,



Raymond R. Cruz
City Manager

RRC:hl

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Rolling Hills Mayor and City Council
Dan Trejo, Acting District Manager, California Water Service Company
State Senator Ben Allen
State Assemblymember David Hadley