

**From:** Jay Jacobson  
**To:** [commentletters](#)  
**Subject:** Public Comment Execute Orders B-37-16 and B-40-17  
**Date:** Wednesday, February 14, 2018 11:02:28 AM

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Dear State Water Resources Control Board:

This is regarding: Consideration of a proposed Resolution adopting a regulation prohibiting wasteful water uses to implement Executive Orders B-37-16 and B-40-17.

West Hollywood has zero regulations about groundwater, and has become one massive dewatering site. In addition, the groundwater in West Hollywood is know to be toxic, and is being sent (unfiltered) to Ballona Creek, and then into Santa Monica Bay. This water needs to be recycled, reused and replenished.

**BRIEF OVERVIEW:**

Part of the city of West Hollywood sits on a very high water table (6-12 feet below grade, I learned). When there is subterranean construction in these areas, groundwater must be pumped from the site. As there is a giant boom in construction in West Hollywood (including a new trend in building basements and subterranean parking in homes, apartments, hotels and commercial projects), there will be a lot more groundwater pumped from the city - in addition to the countless sites which already pump daily (some since the 1970s). In my immediate area there have been three sink holes in the last 14 years, and we had 6 dead trees on my street just before the recent rains which an arborist said was due to a lowered water table. There are zero regulations on building underground in the city - other than making sure the building is structurally sound. There is a building inspection department, but they don't deal with ground water - only the buildings. You can build as many levels down as you want (so parking lots go down three stories), which requires daily dewatering. At night it sounds like Niagara Falls if you stand next to some of the storm drains in the streets. I was told by the city that the aquifer in my neighborhood was not of importance, the groundwater in West Hollywood replenishes itself, and that groundwater has no effect on vegetation. So subterranean construction continues with a fervor. West Hollywood does not have its own water or water department (they use water from both the City of Los Angeles and the City of Beverly Hills). The groundwater that is pumped is not being replenished or treated, and no one seems to know where the source is.

**PERMITS:**

The City of West Hollywood issues a General Dewatering Permit (NPDES) for all groundwater pumping (at least that's all I can find). In speaking with the permits department, I learned there is no filtration for any water going from the storm drains to Ballona Creek to the Santa Monica Bay. They said the construction sites are required to test the water themselves and file a report. I was told by the City of West Hollywood and construction site workers that the water being pumped was too contaminated to use on our lawns, so I'm not sure why it's OK for the ocean. No one from the City of West Hollywood is monitoring the dewatering process (how many gallons, the duration of dewatering, etc.), so the city has become one huge, unregulated permanent dewatering site.

**DEAD TREES:**

Just before the recent rains (at the height of the last drought), my street had six large trees (including one of my front yard) die all within a year of each other. I hired an arborist regarding my tree (which I didn't know why it was dying), who said it was dying from a lowered water table. It is my belief, living in West Hollywood for the past 22 years, that this beginning of a tree die out is from the new trend of the past ten years or so, of allowing so much subterranean construction where the water table is high. Major building in the area in the past (Cedar's Sinai Medical Center, The Beverly Center Shopping Mall), had no subterranean parking - only above ground. This a new trend, and dewatering sites now are ALL around the city.

Regulations need to be put into place to protect our vital groundwater, especially in this free for all construction boom we are in at the moment. And the City of West Hollywood needs to be included in all regulations.

Thank you for hearing my concerns.

Sincerely,

Jay Jacobson  
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