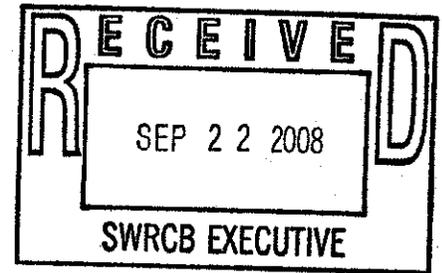




City of Morro Bay

955 Shasta Ave
Morro Bay, CA 93442 • 805-772-6261

10/1/08 Board Workshop
Urban Water Conservation
Deadline: 9/23/08 by 12 noon



State Water Board

On August 22, 2008 the State solicited comments regarding the development of an urban water conservation regulatory program, its scope, content and necessity. The City of Morro Bay has some of the lowest per capita water usages in the State due to extensive retrofit and conservation efforts in the early 1990's. It is important to Morro Bay that the State not create a new mandatory regulatory program that will pull limited resources away from other beneficial/ mandated activities without providing adequate grant funding mechanisms. The City of Morro Bay provides the following general comments:

1- If 225 of the Urban Water suppliers have subscribed to the CUWCC, representing about 75% of the State's urban water supply, and many non subscribing agencies have adopted similar BMP's, what purpose will be served by creating a new mandatory program?

2-State wide water usage varies tremendously across the state. Water conservation programs should be locally developed and managed to ensure that implemented BMP's will provide a commiserate benefit to the community served. Selected BMP's will not provide equal benefit to every community served and may not be cost effective for some communities.

3- If the State elects to create a new program, the focus should be on those communities with high average per capita usage. For example the City of Morro Bay has some of the lowest per capita water usages in the State due to extensive retrofit and conservation efforts in the early 1990's an additional 20% reduction may not be readily achievable.

The City of Morro Bay has the following comments on each BMP's.

BMP #3 – System Water Audits, Leak Detection and Repair – Recent changes in the plumbing code requiring fire sprinkler to residences have led to the upsizing of water meters to accommodate residential sprinklers. This residential sprinkler requirement will likely lead to greater apparent water losses in many distribution systems and will make the 10% loss goal harder to meet.

BMP #4 – Metering with Commodity Rates for All New Connections and Retrofit of Existing connections – Many of the un-metered services are vestiges of old water service/supply agreements. The costs to change these types of agreements will often exceed the benefits or may result in the loss of water supplies.

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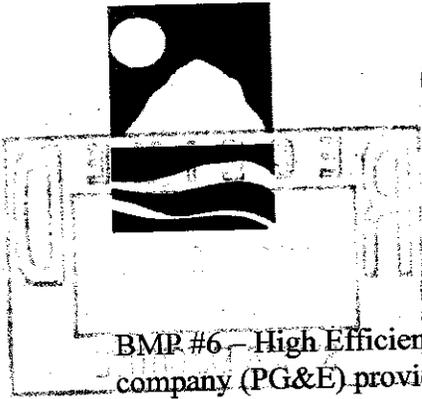
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BMP #6 – High Efficiency Washing Machine Rebate Programs – In our jurisdiction the electric company (PG&E) provides a rebate for certain types of washing machines. This BMP is largely redundant to that program. Additionally washing machines are often removed upon sale unlike other plumbing fixtures so that the community investing in the washing machine rebates may not receive the benefit in communities with high turnover rates.

BMP # 11 – Conservation Pricing – The City of Morro Bay has one of the most aggressive water rate structures in the State. With each additional water costing more than the last after the first block. A mandated alternate to this program will probably not provide the same benefit as our current rate structure.

BMP #12 – Conservation Coordinator – This requirement will impact smaller agencies to a greater extent than larger agencies that can more readily absorb additional staff costs.

BMP #13 – Water Waste Prohibition – Does not the State Constitution already cover this requirement by precluding the unreasonable use of water?

Lastly with the ever increasing cost of energy, the costs to provide potable water are constantly increasing. These natural market mechanisms will provide a market based incentive to conserve without the costs of an additional State program. Please carefully consider the impacts that crafting a mandatory water conservation program will have to water provider budgets.

Dylan Wade
Utilities/Capital Projects Manager
City of Morro Bay

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