



CITY OF MORRO BAY
PUBLIC WORKS DEPARTMENT
955 Shasta Avenue
Morro Bay, CA 93442

April 13, 2015

Jessica Bean
Jessica.Bean@waterboards.ca.us
State Water Resources Control Board

Re: Proposed Regulatory Framework for Emergency Rulemaking

Dear Ms. Bean:

The City of Morro Bay is pleased to submit comments on the proposed framework on how the 25% reduction could be structured. Morro Bay is a small coastal community who has been conserving water for quite some time. The City would like to suggest rather than the tiered percentages, that there be a ceiling on the amount of gallons per capita. It appears from the data provided that the average R-GPCD for the state is 152.5. We suggest that no water supplier's customers be allowed to use more water than 0.75 of the statewide average or 114.8 GPCD. For customers that use less than this average, these customers need to continue using the current conservation amount, i.e. no backsliding. Why should some of the water supplier customers in tier 3 and 4 get to use more than the average water use for the entire state?

It does not appear equitable that "water wasters" are being asked to cut water use by 35% and still result in usage that is **considerably higher** than water suppliers usage in tiers 1 and 2 and the statewide average. The current structure benefits the "water wasters" while punishing the water savers. For example Cambria customers use the least amount of water per capita in the entire state at 40 R-GPCD but yet still have to reduce by 10% to 36 R-GPCD. Water suppliers in tier 4 are currently using over 165 R-GPCD, are required to reduce 35% but will be allowed to use to 107 - 381 R-GPCD. Again this is not an equitable approach to conserving the State's water resources; no water customer should be allowed to use 300 R-GPCD.

We thank the State Water Board for their dedication to protecting California's water, and the opportunity to submit comments. If you have any questions please contact Damaris Hanson 772-6265 dhanson@morro-bay.ca.us.

Sincerely,

Rob Livick, PE/PLS
Public Works Director/ City Engineer