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DIV OF WATER RIGHTS
SACRAMENTO

KDM
WR-2009-0060

February 3, 2017

Ms. Kathy Mrowka
Mr. John O'Hagan
Ms. Marianna Aue
Mr. Les Grober
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Dear Ms. Mrowka, Mr. O'Hagan, Ms. Aue and Mr. Grober,

I am a native of Monterey and a life long resident on the Monterey Peninsula. I have experienced numerous droughts and mandatory water restrictions on the Monterey Peninsula. I am writing regarding Condition 2 of Order WR 2009-0060.

The Monterey Peninsula community is committed to securing a new water supply and adhering to the Cease and Desist Order (CDO), including the moratorium on new connections and ensuring economic growth is not promoted at the expense of the Carmel River.

Residential and non-residential water use will vary over time based on vacancies, behaviors, climate, family dynamics, business practices, and economic conditions making actual water use records for a specific period an inconsistent baseline for determining "increased use."

The community needs a clear, predictable, objective set of rules to allow investment in businesses and properties.

The Monterey Peninsula Water Management District (MPWMD) and Cal-Am have multiple rules and incentives for continued reductions in customer demand for water throughout the system. The local regulatory framework is gearing towards managing water use at the system-wide "macro" level and has resulted in almost 3,000 acre feet of demand and reduction since the CDO was issued.

The CDO does not need to be amended, however new interpretive language should be adopted. Proposed language, including footnotes, is as follows:

"increase use of water at existing service addresses shall mean an increase in capacity to use water at an existing residential or non-residential site in excess of

the pre-project capacity to use water¹, credit from water saved on a site, and/or a debit to a jurisdiction's allocation of water as documented by the Monterey Peninsula Water Management District under its Rules and Regulations.²

We have been dealing with the CDO and various water restrictions off and on for most of our life. We ask that you please act on and identify Condition 2 of Order WR 2009-0060 as requested by the MPWMD. All other organizations which comment on this issue have not had to live with these restrictions affecting the use of water.

Please support the one regulatory agency, the MPWMD, which has been in place for many years and has responsibly studied the water issues on the Monterey Peninsula, and support Condition 2 of Order WR 2009-0060.

Sincerely,

A handwritten signature in black ink, appearing to read "David Armanasco", with a long horizontal line extending to the right.

David Armanasco

President

Armanasco Public Relations, Inc.

¹ Water Use Capacity, Capacity, Site, Water Use Credit, Jurisdiction, and Allocation are all defined terms in District 11.

² District Rule 23 governs Water Permits, Rule 24 the calculation of Water Use Capacity, and Rule 25.5 credits for investment in water savings.