



Community Hospital
of the Monterey Peninsula
Montage Health

January 20, 2017

State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Attention: Kathy Mrowka
John O'Hagan
Marianna Aue
Les Grober

Re: Comments on Condition 2 – Cease and Desist Order – WR 2009-0060

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

Community Hospital of the Monterey Peninsula (CHOMP) is the only hospital serving the roughly 140,000 people on the Peninsula. CHOMP employs over 2,100 people, with many more employed under the various subsidiaries of our parent company, Montage Health. The dynamic nature of the health care industry requires Montage Health and CHOMP to have flexibility in optimizing its current and future properties to meet the changing needs of the communities we serve – especially providing access to critical outpatient physician clinic and hospital outpatient services.

CHOMP and the Monterey Peninsula community is committed to securing a new water supply and adhering to the new Cease and Desist Order, including the moratorium on new connections and ensuring economic growth is not promoted at the expense of the Carmel River. However, condition 2 comments of the Cease and Desist Order contain some unnecessary restrictions by stipulating preclusion of using water credits 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 (the "District").

The District Rule 24 provides a method of calculating residential and non-residential Water Use Capacity based on fixture units, landscape standards, and commercial factors – an industry-recognized practice. For decades, the District's permitting protocol has been familiar to property owners, businesses, architects, and municipal planning departments on the Monterey Peninsula. Residents and businesses can make investment in water savings on a site and repurpose the saved water credit without an increased use. District Rule 25S governs the creation of such a credit.

When it comes to your health, everything matters.

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Recognizing that the District's regulatory framework is aligned with the CDO and "no new water", the District has proposed that the CDO be applied on the "macro" level which we support. This approach ensures that the effective diversion limits (EDL) are met, but flexibility be allowed at the "micro" level using the District's existing permit process to determine how existing service addresses are evaluated. As such, we feel the CDO does not need to be amended.

The economic vitality of our region is dependent on efficient and resourceful water management. We have a proven allocation system for counting water resources. To change the rules now would curtail opportunities which are essential to our region's economic future. Please allow the Monterey Peninsula Water Management District's regulatory framework to stand with the understanding that our community is committed to continuing its efforts to conserve water resources and stay below the agreed upon Effective Diversion Limits.

Thank you for your consideration of these comments.

Sincerely,



Dan Limesand
Director, Business Development & Contracting
Community Hospital of the Monterey Peninsula