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Sent: Tuesday, January 10, 2017 5:38 PM

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Subject: WR 2009-060 Condition 2 --PWN Submission

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Public Water Now thanks the State Water Resource Control Board for the opportunity to participate in consideration of new interpretations of Condition 2 of WR 2009-060.

Having attended the 12/13/16 meeting in Sacramento, and followed subsequent emails in response to MPWMD's revised proposal, we still see insufficient justification for adopting any proposed new interpretation.

- o Far from clarifying the application of Condition 2, the changing new interpretations cause confusion as to their consequences, i.e. the unstated consequences are obscure, but appear to be more important than the surface content of the interpretations.
- o At least from the point of view of the residential ratepayers that we represent (and who constitute a large majority of Cal Am connections in the area), the application of Condition 2 since 2009 has been perceived as strict but fair. MPWMD is to be commended on its management of the moratorium in the best interests of all ratepayers.
- o Condition 2 has not been seriously problematic, and has aided in the remarkable conservation efforts of the community -- the spirit of which could easily be damaged by any change in the rules to favor a small minority of big players at the expense of the many individual residents.
- o The proposed reinterpretation, prepared by MPWMD with the support of some non-residential ratepayers, but without any previous involvement of residential ratepayers, naturally raises the question of whether so much effort has been put into the proposal without any intention of making possible some non-residential projects that would not currently be allowed under Condition 2.

o Requests for salient examples of decisions that would be made differently under a revised interpretation
have gone unanswered, again raising doubts as to motivation.

Hence we respectfully request that SWRCB deny the proposal to amend Condition 2.

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representing PWN