

From: j.ecull@comcast.net [mailto:j.ecull@comcast.net]

Sent: Tuesday, February 07, 2017 10:52 AM

To: O'Hagan, John@Waterboards

Cc: Dave Stoldt; Bill Kampe

Subject: Comment Letter on Condition 2 CDO 2016-0060

Hi John-

Attached is a copy of a letter I sent to Tom Howard on January 19, 2016, subject:

"Support for Local Decisions for Cal Am Service Connections under CDO 2016-0060"

Since I did not find the letter on the SWRCB web site as having responded to Condition 2 of the CDO, I wanted to be sure you received a copy my comments on behalf of the Monterey Peninsula Regional Water Authority (MPRWA).

Thanks- Jim Cullem
Executive Director
MPRWA

MONTEREY PENINSULA REGIONAL WATER AUTHORITY



January 19, 2017

Mr. Tom Howard
Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Directors:
Bill Kampe, President
David Pendergrass, Secretary
Jerry Edelen, Treasurer
Ralph Rubio, Director
Clyde Roberson, Director

Executive Director:
Jim Cullen, P.E.

Subject: Support for Local Decisions for Cal Am Service Connections under
CDO 2016-0060

Dear Mr. Howard:

As you know, the SWRCB recently approved CDO 2016-0060 which amended CDO 2009-0060 and extended the milestone timeline concerning the overdraft of Carmel River water by our water purveyor, California-American (Cal-Am) Water.

SWRCB staff and community representatives from the Monterey Peninsula were asked by the Board to confer on Condition 2 of the CDO, and develop an interpretation that would provide clearer guidance locally on what is permissible. That meeting has occurred and representatives of the Monterey Peninsula Regional Water Authority (MPRWA) as well as others from the Monterey area participated. We believe much progress was made towards understanding the impact of Condition 2, both on land use decisions and on water usage on the Peninsula.

Two key points emerged in the discussions:

1. Condition 2, as currently interpreted, imposes great economic uncertainties for property owners, and inhibits newer land use initiatives that would make more productive use of existing water.
2. Les Grober of the SWRCB staff noted that of the 3000 AFY reduction in water usage achieved by the Peninsula over the past several years, less than 1% was related to Condition 2. The vigorous conservation measures and best

management practices that our local Water Management District has imposed on our residents and businesses have created much of the savings.

An alternate interpretive statement for Condition 2 has been proposed by the Monterey Peninsula Water Management District (MPWMD), and I urge the staff of the SWRCB to support the intent and spirit of that proposal.

The Regional Authority Board adopted a Position Statement in 2013 that, "Allocation decisions about the use of the water should....be made locally." I would note that the MPWMD District was formed 40 years ago to manage the Monterey Peninsula water supply, is responsible by law to do so, and has done so with conviction, detailed local knowledge, and effective public outreach. Accordingly, I encourage the SWRCB staff to defer, with reasonable oversight, to MPWMD decisions on water allocation on the Monterey Peninsula.

Should you or your staff wish to discuss the subject further, please do not hesitate to contact me at 831-241-8503 or j.ecull@comcast.net.

Sincerely,

James M. Cullem P.E.
Executive Director