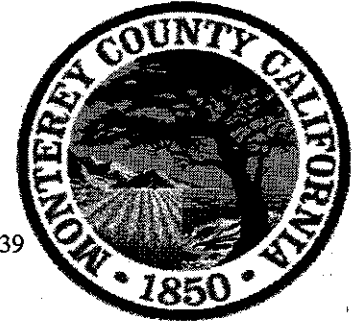


# MONTEREY COUNTY

## BOARD OF SUPERVISORS

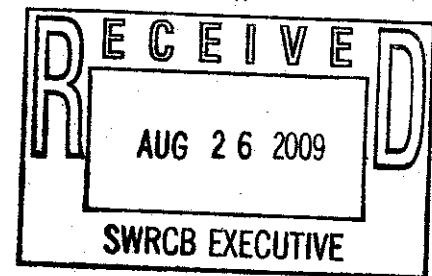
JANE PARKER, SUPERVISOR – FOURTH DISTRICT  
2616 FIRST AVENUE, MARINA, CA 93933  
EMAIL: jane.parker@co.monterey.ca.us PHONE: (831) 755-5044 FAX: (831)384-1839



August 25, 2009

VIA ELECTRONIC MAIL TO:  
[COMMENTLETTERS@WATERBOARDS.CA.GOV](mailto:COMMENTLETTERS@WATERBOARDS.CA.GOV)

Board of Directors  
c/o Jeanine Townsend  
Clerk of the Board  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814



**RE: Cal Am CDO Hearing Workshop**

To the Esteemed Members of the Board:

As a Monterey County Supervisor, I wish to submit the following comments on the proposed cease and desist order against the California American Water Company, for its Monterey Peninsula service area.

It is well recognized that there is an urgent need to reduce water usage from the Carmel River, to preserve that habitat for endangered species, and for the overall benefit of the community. As government officials, it is our job to balance competing interests and find solutions which consider all the complex aspects of a single problem. While there are several aspects of the cease and desist order which concern me, I wish to focus my comments on the impact of the CDO on local economic development plans.

I represent District 4 in Monterey County, which includes a portion of the affected service area. The CDO would impose a moratorium on the issuance of water permits for new connections or intensification of use at existing connections. There is currently approximately 108 acre feet of water remaining from a pre-1995 allocation to the local cities with the service area. Some cities have utilized all or most of their pre-1995 allocations, but some have saved the allocation for particular projects with community value. In particular, the City of Seaside had hoped to use a small portion of its 54 acre-foot allocation for a redevelopment area in the downtown area -- the plans for which are actively moving forward at this time -- which will become undevelopable if the CDO is drafted as written.

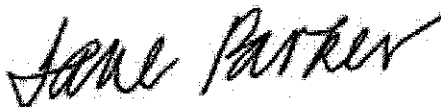
**From a public policy perspective, the CDO appears to penalize those jurisdictions which did not utilize their water allocation. This reinforces a belief that judicious planning for the use of water rights is risky – that they should be used immediately and to the fullest extent, regardless of actual need. I believe this is the wrong message for government to send to the public. Those who have not used the water should be recognized for having saved the community 108 acre feet of water each year since 1995, which amounts to a total of 1,500 acre feet of water saved. The cities which have carefully planned to utilize this water for the community benefit should be allowed to continue with their course of action. I refer to letters from the cities regarding the financial impact of the proposed CDO.**

**Not only is the total of 108 acre feet is less than 1% of the service area's total annual water usage, it is also very unlikely that more than a fraction of this water will be needed before a water supply project is completed in this region. If some allowance could be made to allow access to this water credit, or even a portion of it for redevelopment purposes, the State Water Resources Control Board will be demonstrating the kind of comprehensive, fair-minded thinking toward which all of us in government should be striving.**

**A solution to our water supply problem is long overdue, but to devastate the plans for redevelopment in a community that has great need of such projects, in exchange for such a small savings of water, does not make sense from a public policy point of view. I urge you to consider a mechanism within the Cease and Desist Order to address this.**

It is encouraging that the community is moving ahead with a regional water supply project, inspiring coordination between public agencies which has not previously been seen on the Monterey Peninsula. The focus must be on the solutions. Thank you for your time and your service on the Board.

Sincerely,

A handwritten signature in black ink that reads "Jane Parker". The signature is written in a cursive, slightly slanted style.

Supervisor Jane Parker  
District 4

cc: City of Seaside