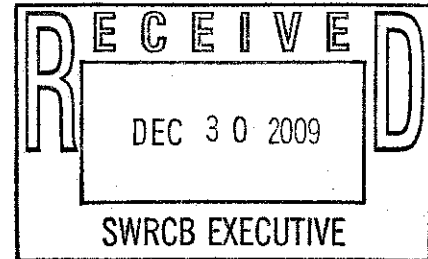


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December 30, 2009



VIA E-MAIL COMMENTLETTERS@WATERBOARDS.CA.GOV

Charles R. Hoppin, Chairman
State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
1001 I Street
Sacramento, CA 95814

Re: Comments of Pebble Beach Company Regarding Consideration of a proposed Order pertaining to petitions for Reconsideration of Cease & Desist Order 2009-0060.

Dear Chairman Hoppin and Members of the Board:

Pebble Beach Company ("PBC") appreciates the Board's consideration of its Petition for Reconsideration and the changes made in the draft Order Denying Reconsideration ("Order") in response thereto. While we believe that the other changes that were suggested in our Petition for Reconsideration were worthwhile clarifications, we are satisfied that the one critical change affecting PBC made by the Board in the Order, together with the well-stated exposition in the Order of the reasons and basis supporting the exception in the CDO for the PBC Water Entitlements, make clear that the holders of the PBC Water Entitlement, once connected to and customers of the Cal-Am system, are to be and will be treated the same as all other customers of Cal-Am. We believe this language demonstrates the Board's intent that holders of the PBC Water Entitlement must not be treated differently from other Cal-Am customers from and after the December 31, 2016 date, and thereby addresses an important concern PBC had expressed in previous comments.

Very truly yours,

DOWNEY BRAND LLP

A handwritten signature in black ink, appearing to read "S. Saxton".

Steven P. Saxton

SPS:se

cc: Attached Interested Parties List

1 **STATEMENT OF SERVICE**

2 I, Starna Erickson, am a resident of the State of California, over the age of eighteen years,
3 and not a party to the within action. My business address is Downey Brand LLP, 621 Capitol
4 Mall, 18th Floor, Sacramento, California, 95814-4731. On December 30, 2009, I served the
5 within document(s):

6 **Comments of Pebble Beach Company Regarding Consideration
7 of a proposed Order pertaining to petitions for Reconsideration
8 of Cease & Desist Order 2009-0060**

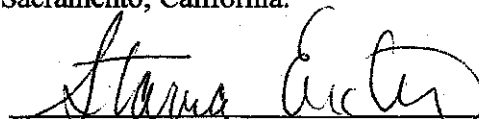
- 9 **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax
10 number(s) set forth below on this date before 5:00 p.m.
- 11 **BY HAND:** by personally delivering the document(s) listed above to the person(s)
12 at the address(es) set forth below.
- 13 **BY MAIL:** by placing the document(s) listed above in a sealed envelope with
14 postage thereon fully prepaid, in the United States mail at Sacramento, California
15 addressed as set forth below on the Interested Parties List to City of Carmel-by-
16 the-Sea ONLY.
- 17 **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an
18 overnight delivery service company for delivery to the addressee(s) on the next
19 business day.
- 20 **BY PERSONAL DELIVERY:** by causing personal delivery by _____ of
21 the document(s) listed above to the person(s) at the address(es) set forth below.
- 22 **BY ELECTRONIC MAIL:** by transmitting the document(s) listed above via
23 electronic mail to all parties listed to receive electronic service at the electronic
24 mail address set forth on the Interested Parties List.

25 ***See Attached Interested Parties List***

26 I am readily familiar with the firm's practice of collection and processing correspondence
27 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same
28 day with postage thereon fully prepaid in the ordinary course of business. I am aware that on
motion of the party served, service is presumed invalid if postal cancellation date or postage
meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above
is true and correct.

Executed on December 30, 2009, at Sacramento, California.


Starna Erickson

1024249.4

Interested Parties List

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