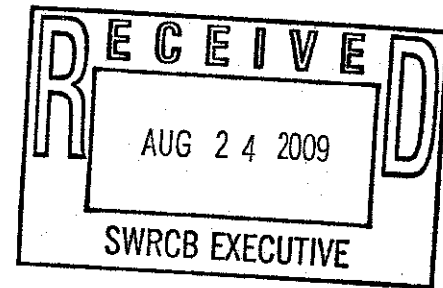


August 23, 2009

Jeanine Townsend
Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Subject: Cal Am CDO Hearing Workshop

The League of Women Voters has reviewed the draft Cease and Desist Order (CDO). The order is comprehensive and recommends numerous actions that are needed to protect the Carmel River.

In our March 2008 comments on the first CDO, we took issue with the use of water conserved by Cal Am customers to support growth. We urged a moratorium on hookups for growth as a condition of the CDO, so that conserved water is not used for new development. Thus, we support the proposed moratorium on new hookups for growth including hookups within the Del Monte Forest.

In our earlier comments, the League expressed concern about fragmentation of efforts to solve the water supply crisis by municipalities and developers. We noted that permitting of multiple small desalination plants to support development takes focus away from solving the problems of the Carmel River and may worsen those problems. The proposed CDO provision that any Monterey Peninsula community wishing to develop water from a new source for growth must first apply water from the new source to reduce its share of the water being illegally diverted by Cal Am addresses this issue. We support this provision.

The draft CDO requires specific conservation measures totaling almost 1,000 AFY to be implemented by Cal Am. We strongly support these requirements. We also urge the Board to include measures requiring Cal Am to identify waterwasters and implement programs to reduce water use consistent with requirements for the rest of Cal Am's customers. We are not convinced that a graduated rate structure will accomplish the goal. Instead, more stringent regulatory measures may be needed.

The phased reductions in water use would have significant impacts on existing Cal Am customers. We urge the Board to consider that the current situation in part rests with the failure of Cal Am and our local governments to use conserved water to address the overdraft and to pursue incremental water supply projects in a timely manner. We specifically note delays in implementing reclaimed water programs for landscaping and groundwater replenishment.

Finally, we request clarification regarding the use of Carmel River water for growth where a new project would replace an existing project and the new project would reduce water demand over existing uses. Finally, we request clarification regarding the use of Carmel River water for growth where a new project would replace an existing project and

the new project would reduce water demand over existing uses. Would this type of project be permitted under the proposed moratorium?

Thank you for consideration of our comments and concerns.

Sincerely,

Dennis Mar

President