



Carmel River Steelhead Association
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Mr. Leslie F. Grober
Deputy Director, Division of Water Rights
State Water Resources Control Board
PO Box 2000
Sacramento, CA 95812-2000

March 21, 2017

Subject: Orders WR 2016-0016 and WR 2009-0060

Dear Mr. Grober:

As President of the Carmel River Steelhead Association (CRSA) I have been reading with interest and some dismay the letters from Monterey Peninsula Water Management District (MPWMD) regarding their desire to have the State Water Resources Control Board amend Condition 2 of WR 2009-0060.

While I believe MPWMD, for the most part, has done a satisfactory job in regulating water in the area covered by WR 2009-0060, on this issue it appears that MPWMD is placing the interest of the Chamber of Commerce above that of the environment, residential water users, or the majority of the ratepayers and this does not benefit the Monterey Peninsula as a whole.

MPWMD disputes claims by the Sierra Club and Planning and Conservation League that there would not be an increase in water use due to changing Condition 2, yet part of what MPWMD wants to use is water credits and to be a credit should mean that the water is not now being used. So to now use these water credits would be an increase in water use. Likewise if a commercial building has not used water in the period WR 2009-0060 has been in effect, now using that water would be an increase in use as it relates to WR 2009-0060. Further, one of the new building uses wanting increased water is a new hotel, and just increasing the number of people on the peninsula will increase water use from multiple other sources.

MPWMD disputes the water would come from the Carmel River and suggests that it could come from other sources. All of the current other sources are fully utilized and increase in use would have to come from the Carmel River. If there are unused sources of water then that water should have been used and withdrawals from the Carmel River should have been reduced with a lower EDL for the Carmel River.

As CRSA stated before, if there is enough water in the EDL that MPWMD can give permits for new use or increased use at existing locations, then the EDL was set too high. My understanding is the EDL was set higher than what had been used the last three years to allow for increased use due to people realizing there is no longer a drought or increase in use due to uptick in tourism. Now MPWMD wants to change that to extra water for increase in use due to commercial requests and this changes the conditions upon which CRSA based its approval for the extension.

CRSA urges the Board to maintain Condition 2 as written, as understood by the majority of people and as the very good deterrent to increased water use.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian LeNeve".

Brian LeNeve
President CRSA