EXHIBIT 14-B

MONTEREY PENINSULA WATER MANAGEMENT DISTRICT

SEP 7 2004

MPWEIL

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August 17, 2004

Mr. Eric Marsh Las Villas Nogales, Homeowner's Assocation 623 Lighthouse Avenue Pacific Grove, California 93950

Subject: APN 189-542-013

Dear Mr. Marsh:

This letter responds to your inquiry regarding the use of Water Use Credits from properties adjacent to the subject property to develop or sell the subject property with credits.

According to the ownership records on file with Monterey County, the subject parcel is not under identical ownership with the other parcels referenced in your letter (APNs: 189-542-009, 010, 011, and 012). To utilize Water Use Credits from one property to another, the properties must be (1) contiguous to one another, (2) under identical ownership, and (3) the same type of use. These criteria must be current at the time a water permit is issued that utilizes a Water Use Credit.

Sincerely:

Stephanie Pintar

Water Demand Manager

cc: David Laredo