

EXHIBIT 15-P



LEAGUE OF WOMEN VOTERS®
OF THE MONTEREY PENINSULA

January 6, 2009

RECEIVED

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MPWMD

Judy Lehman, Chair
MPWMD Board of Directors
P.O. Box 85
Monterey, CA 93942

Re: Application for California American Water (CalAm) for Monterey Bay
Shores Resort

Dear Chair and Members of the Board of Directors:

The League of Women Voters of the Monterey Peninsula has studied local water issues over many years. Among many water policy matters, we support maintaining a healthy riparian habitat along the Carmel River and meeting the needs of existing water customers prior to addressing future needs.

The League is familiar with issues related to over-pumping the Carmel River and efforts to reduce production. We are particularly interested in the relationship of the Draft Cease and Desist Order (CDO) issued by the SWRCB in January 2008 and the application before you. Last March in a statement to the SWRCB we supported the intent of the draft CDO, mainly the purpose to reduce the production from the Carmel River, even if some hardships were required. This is critical background for your meeting on January 29 when you will consider the application to CalAm to serve Monterey Bay Shores Resort (Ghandour).

We urge you to consider the following:

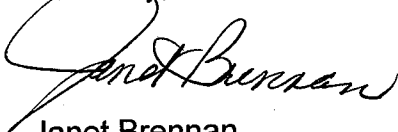
1. CEQA Guidelines (Section 21166) require a Subsequent EIR be prepared if "new information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available." We believe the issuance of the draft CDO qualifies as "new information," thus requiring the preparation of a Subsequent EIR, rather than an Addendum. Therefore this application should be postponed pending preparation and review of a Subsequent EIR.
2. The fact that the Draft CDO is pending and will not be issued until later this summer supports deferring action until this matter is decided. Any consideration to approve the application, even with conditions, would be inconsistent with the intent of CEQA Guidelines (Section 21166).

3. Since this Draft CDO is pending, consideration should be given to impacts on that pending decision if you approve this current application. As identified in the Draft CDO, Fact #17 states, "The current water management strategy used by Cal-Am/MPWMD, however, has not resulted in any significant reduction of unlawful diversions from the Carmel River since 1998. Instead, it appears that water savings resulting from conservation efforts have been redirected to support marginal increases in development." When the issue of overuse is under threat of severe penalty, your approval of this application would appear to disregard the pending decision and might result in a more severe response such as mandatory rationing. In other words, your approval would add further support to the State's argument that Order 95-10 is being ignored since the project would require an increase in current use from the Carmel River.

4. You have another option. The new water supply from the Sand City desalination plant is progressing. It is our understanding that in 2007 the intentions of the developer and Sand City officials were to use this new water supply. We recommend that this option be considered as an alternative to the proposed action and that it be one of the alternatives evaluated in a Subsequent EIR.

Thank you for your consideration.

Sincerely,



Janet Brennan
President

c: City of Sand City