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MPWMD

LandWatch  
monterey county

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Regina Doyle, Chair  
Board of Directors  
Monterey Peninsula Water Management District  
5 Harris Court, Box 85,  
Monterey, CA 93942-0085

Re: Joint Application of Cal-Am and SNG For A Water Distribution Permit

Dear Ms. Doyle:

LandWatch Monterey County supports the Sierra Club's recommendation to adopt conditions for the SNG permit for the EcoResort. LandWatch is concerned about the potential for incremental diversions from the Carmel River during the summer months attributable to (as an indirect effect) Cal-Am's increased production from the Seaside Basin to serve SNG. We hope MPWMD Board formulates conditions that will mitigate potential impacts.

LandWatch specifically directs the MPWMD Board to consider the language below taken from the Sierra Club letter dated August 4, 2010:

*Preventing Cal-Am from indirectly diverting summertime production to serve SNG to the Carmel River would benefit the survival of steelhead fry in the River. Many steelhead fry rear in the habitat below the Narrows. Maintaining flow through this summer and fall in more of this habitat will allow such fish to rear to the smolt life-stage in the river, and avoid the stress and mortality associated with rescue and rearing in an artificial habitat. Even for parts of the river that do eventually go dry, keeping water in the river longer will allow fish more time to grow before they are subjected to rescue. See Williams Declaration at ¶20, 25, 26. Sierra Club again requests that if the District Board declines to perform additional environmental review, it minimize any impacts of Cal-Am production for SNG on the Carmel River, by requiring that there be no increased summer diversions from the Carmel River as an indirect result of Cal-Am's service to SNG and that in terms of water accounting, Cal-Am shall not use ASR water to serve SNG.*

LandWatch appreciates this opportunity to provide comment on the Joint Application in anticipation of the meeting today, August 16.

Sincerely,

Amy L. White, Executive Director