

EXHIBIT 16-A

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STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD

In the Matter of the Unauthorized Diversion and Use
of Water by the California American Water
Company; Cease and Desist Order WR 2009-0060

APPLICATION TO MODIFY CEASE
AND DESIST ORDER WR 2009-0060

I. Introduction

Pursuant to Water Code section 1832, California American Water (CAW), Monterey Peninsula Regional Water Authority (MPRWA), Monterey Peninsula Water Management District (MPWMD), [OTHERS?], (collectively, Petitioners) hereby apply to the State Water Resources Control Board (SWRCB) to modify Order WR 2009-0060. In Order WR 2009-0060 and WR 2010-0001 (referred to herein as “Order” or “CDO”), the SWRCB required CAW to comply with Condition 2 of SWRCB Order WR 95-10 by diligently implementing various

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1 actions in collaboration with the MPRWA, MPWMD and other community interests, including
2 termination of unlawful diversions from the Carmel River in accordance with the schedule and
3 conditions set forth in the Order. The Petitioners have diligently implemented measures to
4 comply with the CDO, and CAW is currently meeting or has met all of the conditions of the
5 Order. Despite the best efforts of these parties as described in Section III.B below, factors
6 beyond CAW's control will make it unlikely that that CAW will bring on-line a replacement
7 water supply to eliminated all unauthorized diversions from the Carmel River ahead of January
8 1, 2017, as required in the CDO. Accordingly, the petitioners hereby request that the SWRCB
9 modify the CDO as described below in Section III.B, and as specifically proposed in Attachment
10 1. In addition, Petitioners request assistance from the SWRCB in the form of provision of
11 support for certain applications, permits, loans and grant funds to implement projects that will
12 reduce the amount of unauthorized diversion from, and increase the amount of water in, the
13 Carmel River, particularly during the drier months of the year. In consideration of the SWRCB's
14 support for those projects and modification of Order WR 2009-0060, as requested in this
15 application, the Petitioners commit to:

- 18 • continued development and implementation of efficiency and conservation measures;
- 19 • continued development and implementation of projects to develop alternative and
20 supplemental water supplies; and
- 21 • continued development and implementation of fish and wildlife protection and
22 enhancement measures.
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24 The additional measures proposed in this application are described further in Sections III.A and
25 III.C below.

26 **II. Standard of Review**
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1 The SWRCB has broad discretion to modify a CDO and to revise a schedule of
2 compliance contained in a CDO. (See Order WR 2010-0002.) Petitioners make this application
3 to the SWRCB pursuant to Water Code section 1832, which states, in relevant part: “The board
4 may, after notice and opportunity for hearing, upon its own motion or upon receipt of an
5 application from an aggrieved person, modify, revoke, or stay in whole or in part any cease and
6 desist order issued pursuant to this chapter.” For the reasons set forth below, including protective
7 measures that will be implemented by the petitioners, Petitioners submit that there is good cause
8 for the SWRCB to modify the schedule and conditions in Order WR 2009-0060.
9

10 **III. Argument**

11 A. CAW and Petitioners have diligently and aggressively implemented measures to
12 comply with CDO 2009-0060.

13 1. Efficiency and Conservation Measures

14 CAW has implemented efficiency and conservation measures in an effort to control and
15 reduce customer demand and system losses within CAW’s Monterey district, such that the
16 community is currently outperforming the Carmel River diversion reduction targets set forth in
17 the CDO. Specifically, CAW has implemented a moratorium on new service connections within
18 its Monterey district, (see Revised California Public Utilities Commission (CPUC) Sheet No.
19 6509-W), and on [DATE] submitted an application to the CPUC to modify revised Rule No.
20 14.1.1 in CAW’s CPUC tariff, Water Conservation and Rationing Plan for the Monterey District.
21 CAW filed this application in recognition that Rule 14.1.1, which is based upon the MPWMD
22 Regulation XV, Expanded Water Conservation and Standby Rationing Plan, is outdated since it
23 was last reviewed by the CPUC in a 2007 proceeding and it could be less cumbersome and
24 potentially less costly to implement.
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27 In addition, CAW and MPWMD have implemented a variety of customer water
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1 conservation and efficiency programs, including programs targeting high use commercial
2 customers such as laundries, hotels and car washes. CAW's efficiency standards have placed it in
3 the lowest residential per-capita usage tier under the SWRCB's recently adopted emergency
4 urban water conservation regulations.

5
6 CAW and MPWMD also have implemented programs targeting reductions in outdoor
7 irrigation, including replacement of irrigated turf with drought tolerant landscaping or artificial
8 turf, incentives for installation of weather-based irrigation controllers, mandatory installation of
9 rain sensors on irrigation systems, and mandatory water efficiency requirements for all non-
10 residential customers and certain residential customers. (See MPWMD Regulation XIV.) In
11 February 2010, CAW implemented, with CPUC approval, a new tiered conservation rate
12 structure with increases directed at the top tier users to promote conservation practices and
13 reduce overall water usage. Tier 4 and 5 usage is almost exclusively outdoor watering. Compared
14 to the five year historical tier 4 and 5 usage, current tier 4 and 5 usage is down approximately
15 83% to 93% thus far in Water Year 2014-2015. (See Table Nine in CAW's 2nd Quarterly Report
16 for the 2014-2015 Water Year to SWRCB pursuant to Order WR 2009-0060.)

17
18 Finally, CAW has implemented and continues to implement programs to detect and
19 reduce non-revenue system losses, including: replacement of older water mains and service lines
20 in areas shown to be more leak prone; water meter replacement; active leak detection;
21 technological solutions to manage lost water; and operational fixes such as pressure reduction.

22
23 *2. Monterey Peninsula Water Supply Project*

24 CAW has diligently pursued the Monterey Peninsula Water Supply Project (MPWSP),
25 which will produce the replacement water supply necessary to eliminate unauthorized diversions
26 from the Carmel River. On April 23, 2012, CAW filed an application to the CPUC for approval
27 of the MPWSP. The MPWSP includes the following components: 1) a desalination plant and
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1 associated source-water slant wells and conveyance system, which can produce up to 9,752 acre-
2 feet-annually (afa) for system demand; 2) an Aquifer Storage and Recovery (ASR) project to
3 store water lawfully diverted from the Carmel River in the Seaside Groundwater Basin for
4 subsequent recovery, which permits an annual net storage of 1,300 acre-feet; and possibly 3) a
5 Groundwater Replenishment (GWR) project that could treat recycled water and replenish up to
6 3,500 afa in the Seaside Basin. The GWR project is being developed by the MPWMD and
7 Monterey Regional Water Pollution Control Agency (MRWPCA) and, if timely approved, could
8 result in a down-sized desalination plant. The Certificate of Public Convenience and Necessity
9 (CPCN), approving the MPWSP, is anticipated from the CPUC in the first quarter of 2016.

11 In September 2014, Governor Jerry Brown signed Senate Bill (SB) 936, authored by
12 Senators Bill Monning and Anthony Cannella and Assemblymen Mark Stone and Luis Alejo.
13 This legislation allows the MPWSP to utilize partial public financing if it is available at a lower
14 rate than conventional, private project financing.

16 Significant progress has been made on the MPWSP, including issuance of a Draft
17 Environmental Impact Report (DEIR) for the project pursuant to the California Environmental
18 Quality Act (CEQA). The CPUC released its Draft Environmental Impact Report (DEIR) for the
19 MPWSP on April 30, 2015. The release of the DEIR began a 60-day public comment period,
20 including public meetings and presentations, ending on July 1, 2015.

22 In addition, a new test slant well located on the CEMEX property in Marina, California
23 was completed in March 2015. The test well was put into long term operation on April 22, 2015.
24 Data from test well and an associated network of monitoring well is posted weekly on CAW's
25 MPWSP website. Preliminary test well results have been promising and indicate that the test
26 well is operating as it was expected to.

27 In addition, substantial progress also is being made on the GWR component of the
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1 MPWSP. On April 23, 2015, MPWMD and MRWPCA released a DEIR for a 45-day public
2 comment period that will close on June 5, 2015.

3 *3. Other Projects to Replace and Supplement Carmel River Diversions*

4 CAW and other Petitioners have developed, permitted and implemented supplemental
5 water supply projects to reduce unauthorized Carmel River diversions. These projects include
6 the Seaside Middle School ASR Well #3, which allows the lawful diversion and aquifer storage
7 of up to an additional 500 afa. CAW also obtained additional appropriative water rights under
8 SWRCB Permit 21330 to lawfully divert up to 1,488 afa from the Carmel River. Permit 21330
9 authorizes the diversion of water under Table 13 of SWRCB Decision 1632 (1995).¹
10

11 Cal-Am has been a participant with the Pebble Beach Company (PBC), the Carmel Area
12 Wastewater District (CAWD), the Pebble Beach Community Services District (PBCSD), and
13 MPWMD in accomplishing perhaps the most renowned golf course recycled water irrigation
14 project in the country. The CAWD-PBCSD Wastewater Reclamation Project (as it is known)
15 treats wastewater at the CAWD plant to a tertiary level, which is then distributed by PBCSD as
16 recycled water to irrigate all of the Del Monte Forest golf courses. This project is presently
17 supplying an average of 1,000 afa of recycled water to the golf courses, conserving that amount
18 of diversions from the Carmel River. In addition to MPWMD's conservation programs, this
19 project is one of the largest water saving projects operating on the Monterey Peninsula. In return
20 for its financial commitment (of which PBC has funded over \$22 million in operating shortfalls
21 and debt service) which made the project possible, PBC (with other Del Monte Forest
22 landowners) received the Pebble Beach Water Entitlement, which was fully recognized in
23 SWRCB Order WR 2009-0060, as modified by Order WR 2010-0001.
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27 _____
28 ¹ Decision 1632 Condition 10 provides an opportunity for the persons named in Table 13 of Decision 1632 to obtain a water right permit with a priority superior to the MPWMD's Permit 20808. Decision 1632 delegates authority to the Chief of the Division of Water Rights to modify the quantities identified in Table 13.

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1 In addition, there are several pending projects and water right transactions that will
2 permit beneficial uses within CAW's service area, including the Seaside Middle School ASR
3 Well #4, which is under development and can store and recover up to an additional 500 afa.
4 CAW also is supporting and facilitating changes to other water rights to permit beneficial uses
5 within CAW's service area, including a water right change petition submitted by the Clint
6 Eastwood and Margaret Eastwood Trust that proposes to partition an existing water right license
7 into two licenses. One of the partitioned new licenses proposes a permanent dedication of flow
8 to the Carmel River. The other new license would allow the Malpaso Water Company to
9 subscribe the beneficial use to property owners with CAW's service areas in the Carmel River
10 watershed and City of Carmel-by-the-Sea; CAW will have a right to use of the water, on an
11 interim basis, to off-set unauthorized Carmel River diversions up to 85.6 afa. On October 31,
12 2014 the SWRCB issued a Draft EIR for the water right petition, and the public comment period
13 closed on December 15, 2014. SWRCB approval of the petition currently is pending.

16 In addition, CAW has proposed to the SWRCB the Carmel River Instream Flow
17 Enhancement Program, whereby CAW will compensate Carmel River water rights holders to
18 implement conservation measures to reduce water diversions from the river in order to increase
19 instream flows for the benefit of fish and wildlife in the Carmel River. On [DATE], CAW and
20 participating Carmel River water users submitted to the State Water Board petitions to
21 temporarily modify the water users water rights to allow for the instream use of water in the
22 Carmel River.

24 Finally, the City of Pacific Grove has certified an EIR for its Local Water Projects to
25 reduce irrigation on the City's municipal golf course and El Carmelo Cemetery, and it is on
26 schedule to implement this project during calendar year 2016. MPWMD provided a feasibility
27 funding grant to assist planning this effort. The SWRCB recently authorized SWRCB SRF
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1 financing for this effort. CAW also has fully supported this project.

2 4. Measures to Enhance and Improve Conditions for Fish and Wildlife

3 Resources

4 CAW and Petitioners have permitted and implemented measures to enhance and improve
5 conditions for fish and wildlife resources in the Carmel River watershed, and to minimize and
6 avoid potential impacts to fish and wildlife during the extension period for Order WR 2009-0060
7 sought by this application. For example, pursuant to a 2009 agreement (amended in 2014)
8 between CAW, the National Oceanic and Atmospheric Administration (NOAA), and the
9 California Department of Fish and Wildlife (CDFW) CAW made a one-time payment of \$3.5
10 million in 2009, annual payments of \$1.1 million per year for 2010 through 2013, and has
11 committed to make annual payments of \$1.1 million per year through 2016 to the California
12 Coastal Conservancy (CCC) for environmental protection and enhancement projects in the
13 Carmel River watershed.
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16 CAW also has permitted and initiated construction activities to re-route the Carmel River
17 and remove the San Clemente Dam. The various construction activities that have been completed
18 to date include complete excavation of the re-route cut, nearly complete installation of the
19 diversion dike and the moving of over one million cubic yards of rock and sediment.
20

21 In addition, CAW and various stakeholders have agreed to construct downstream fish
22 passage facilities at Los Padres Dam, located at approximately River Mile 24.8 on the Carmel
23 River. CAW owns and operates Los Padres Dam and has made various improvements to
24 accommodate upstream fish passage over the Dam. Currently, when the lake elevations fall
25 below the dam's spillway crest, no downstream fish passage corridor exists. To improve
26 downstream fish passage opportunities, the following facilities will be constructed: behavioral
27 guidance system, floating weir surface collector, fish bypass conduit, bypass access portals, and
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1 bypass outfall. Mobilization for the construction of these facilities starts in May 2015 and
2 drawdown activities have been coordinated with all parties so that work behind the dam in the
3 reservoir is anticipated to start in August 2015 once water level reaches the necessary elevation.
4 In July 2013, CAW also requested the CPUC's approval to fund a study to determine the
5 ultimate disposition of the Los Padres Dam, described further below.
6

7 B. CAW and Petitioners request modifications to the CDO because factors beyond
8 CAW's control make it unlikely that the deadline and certain future conditions
9 can be met.

10 Petitioners request that the SWRCB modify the CDO as shown in Attachment 1. The
11 modifications are necessary because factors beyond CAW's and Petitioners' control – namely
12 the late failure of the Regional Water Project and delays in the CPUC approval schedule for the
13 MPWSP – will not permit CAW to complete the MPWSP and eliminate unauthorized Carmel
14 River diversions within the current CDO schedule (i.e., December 31, 2016). The current
15 schedule calls for a final CPUC decision approving the MPWSP and authorizing construction in
16 February of 2016. Once authorized construction of the MPWSP is expected to begin in early
17 2016 and start-up of the project will occur in late-2018 or early-2019.
18

19 Under the CDO, Condition number (no.) 1 states that CAW shall diligently implement
20 actions to terminate its unlawful diversions from the Carmel River and shall terminate all
21 unlawful diversions from the river no later than December 31, 2016. Petitioners request that the
22 SWRCB extend the compliance deadline in Condition no. 1 for four years, from December 31,
23 2016 to December 31, 2020. In addition, Petitioners request that the SWRCB add a process to
24 Condition no. 1 delegating authority to the Executive Director to administratively extend the
25 time for compliance with the deadline, for good cause shown.
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27 In conjunction with extending the deadline in Condition no. 1, Petitioners request that the
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1 SWRCB modify ordering Condition no. 3.a(2) to state that, effective Water Year 2015-2016,
2 CAW shall further reduce unlawful diversions by 1,000 afa from the existing cumulative
3 reduction level in place for Water Year 2013-2014, and to delegate authority to the Executive
4 Director to relax this diversion reduction for good cause shown, as set forth in Petitioners'
5 proposal. Petitioners also request that the SWRCB further modify Condition no. 3.a.(2) to
6 include additional provisions stating that the reduced diversion level shall be maintained (i.e., no
7 additional annual reduction in diversions will be required under the CDO), provided that CAW
8 meets the milestones set forth (proposed Condition no. 3.a(2)(i)), and if milestones are missed,
9 the reduced diversion level shall be further reduced by 1,000 afa until the milestone is achieved
10 (proposed Condition no. 3.a(2)(ii)), unless the further reduction is suspended in the event that
11 CAW, MPRWA and MPWMD follow the notice procedure set forth (proposed Condition
12 3.a(2)(iii)). The proposed milestones include: substantial completion of downstream fish passage
13 facilities at the Los Padres Dam by September 30, 2016; start of construction for any of the
14 CAW components of the MPWSP by September 30, 2017; progress and/or completion of several
15 specified components of MPWSP by September 30, 2018; further progress and/or completion of
16 additional specified components of MPWSP by September 30, 2019; and substantial completion
17 of the CAW components of the MPWSP and no further CAW diversions of Carmel River water
18 without valid basis of right by December 31, 2020. (See Attachment 1, redline to Order WR
19 2009-0060, proposed Condition no. 3.a.(2)(i).)

23 Additional requested modifications include correcting a cross-reference error in
24 Condition no. 3.a.(5), and amending Condition no. 3.a(6) to be consistent with the requested
25 extension of date in Condition 1 and consistent with the intent of Orders WR 2009-0060 and
26 2010-0001 .

27 Petitioners also request that the SWRCB add a new Condition no. 3.a(7) stating that
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1 CAW will use reasonable additional efforts to acquire supplemental water rights and/or pursue
2 other water acquisition and water right changes, which may be credited towards any further
3 reduction required under new Condition no. 3.a(2)(ii) (excepting supplies developed to satisfy
4 Conditions nos. 5 and 3.a(5)). In addition, Petitioners request that the SWRCB amend Condition
5 no. 3.c. to state that any excess ASR water shall be credited towards any further reduction
6 required under new Condition no. 3.a.(2)(ii).
7

8 Finally, Petitioners request another amendment to Condition no. 3.c. to extend the
9 deadline for written submissions to recover ASR water from May 1 to May 31 of each year in
10 order to allow CAW and the fisheries agencies appropriate time to consider information made
11 available at agency meetings that occur after May 1 each year.
12

13 C. SWRCB assistance

14 CAW and other Parties request that the SWRCB commit to use reasonable efforts to assist with
15 the following items:

- 16 1. Issuance of a CPCN from the CPUC and provision of support for CAW's request(s) to
17 the California Coastal Commission and other agencies with permitting jurisdiction for
18 expedited permit issuance for the "Monterey Pipeline and other ASR related
19 improvements," which will facilitate increased ASR diversion during high flows and
20 other improved operations that will increase the amount of water in the Carmel River
21 during dry months;
- 22 2. Provision of support in connection with an application by the MPWMD and the
23 Monterey Regional Water Pollution Control Authority ("MRWPCA") to place the GWR
24 component of the MPWSP on the State Revolving Fund financing priority list;
- 25 3. Provision of support in connection with a request that the SWRCB Division of Financial
26 Assistance award one percent (1.000%), thirty-year loan proceeds from the program
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1 announced March 19, 2014 for water recycling projects for the MPWMD/MRWPCA
2 GWR project, provided an application is submitted by December 2, 2015;

- 3 4. Provision of support and prioritization in connection with the MPWMD/MRWPCA
4 GWR receipt of grant funds pursuant to Chapter 9 of AB 1471 (2014 Proposition 1); and
5
6 5. Provision of support, including expedited review, in connection with water rights
7 Application 32263 of Monterey County Water Resources Agency, and any amendments
8 thereto, in order to facilitate the MPWMD/MRWPCA GWR project.

9 D. Additional measures

10 In consideration for the SWRCB's provision of support on the projects noted above and
11 for the extension of the deadline and other requested modifications to Order WR 2009-0060,
12 CAW and other Petitioners commit to continuing to implement the efficiency and conservation
13 measures described above throughout the CDO period, to diligently pursue the MPWSP and
14 other alternative and supplemental water supply projects, and to implement measures to avoid or
15 minimize effects to fish and wildlife associated with the extension of the CDO deadline. In
16 addition to the fish and wildlife protection and enhancement measures described above, and
17 provided that NOAA and CAW mutually agree to terms for extending the 2009 agreement
18 described in Paragraph III.A.4, above, CAW will make additional annual payments of \$1.1
19 million (pro-rated for any partial years) until unpermitted diversions of water from the Carmel
20 River are replaced by legal sources of water for use on projects during the period of the
21 requested extension of the CDO deadline. The use of these funds and administrative efforts will
22 focus, with the support of CAW and other Parties, on projects that can be implemented during
23 the extension period to mitigate potential effects of the extension. To the extent MPWMD
24 receives funding to carry out or implement mitigation measures that arise out of the 2009
25 agreement described in Paragraph III.A.4 above, MPWMD will use best efforts, including by
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1 fully cooperating with NOAA, CDFW, CCC, and the Carmel River Steelhead Association, to
2 identify, develop, and implement projects that will convey mitigation benefits for the Carmel River
3 before December 31, 2020.

4 Further, subject to final approval from CDFW, NOAA, and any other agencies with
5 permitting jurisdiction, CAW will implement up to \$2.5 million in other projects on the Carmel
6 River to improve fish passage and habitat. These include, in order of priority and estimated costs:
7 additional spawning gravel injections below San Clemente Dam using excess gravel from the
8 San Clemente Dam removal project or from Los Padres reservoir should there be an insufficient
9 quantity or type at San Clemente Dam (\$0.2MM); improvements to the existing upstream fish
10 passage ladder and trap at Los Padres Dam (\$0.2MM); installation of a fish screen at the lower
11 outlet pipe on Los Padres Dam (\$0.8MM); a pit tagging program (\$0.8MM); and a through-
12 reservoir survival study for Los Padres Reservoir (\$0.5MM). Should the higher priority projects
13 exceed the estimated amounts, funding will be pulled from the lower priority projects until the
14 entire \$2.5MM is utilized. Additionally, the estimated cost from the above projects may be used
15 to supplement other related projects occurring on the Carmel River (i.e., pit tagging work being
16 contemplated by MPWMD).
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19 In its April 10, 2015 *Decision Adopting the 2015, 2016, 2017 Revenue Requirement for*
20 *California-American Water Company*, the CPUC authorized CAW to fund a study to determine
21 the ultimate disposition of the Los Padres Dam and Carmel River. CAW will fund MPWMD to
22 continue independently studying the fate of the Los Padres Dam, including contribution from
23 CAW of up to \$1.0MM minus CAW staff time of \$24K per year to assist MPWMD. Studies will
24 include evaluating upstream steelhead passage at Los Padres Dam, whether the public trust
25 resources of the Carmel River will be adversely affected or enhanced by removal or alteration of
26 Los Padres Dam, what options exist to maintain physical existing surface storage in Los Padres
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1 Reservoir, and analysis of the potential geomorphic effects of a resumption or increase of the
2 natural flow of sediment. In addition, CAW expects to work with MPWMD to develop the scope
3 of work and award the feasibility study to a qualified environmental consultant by the close of
4 the third quarter of 2015 and anticipates completing the study during 2018. CAW also will
5 continue to fund mitigation measures pursuant to MPWMD’s current mitigation program
6 through December 31, 2020.

7
8 **IV. Conclusion**

9 For the reasons stated herein, Petitioners respectfully request modification of Order WR
10 2009-0060 as set forth in Attachment 1.

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12 Respectfully Submitted,

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15 Dated:

CALIFORNIA AMERICAN WATER

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19 [Additional Signatories]
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