

ANTHONY LOMBARDO & ASSOCIATES

A PROFESSIONAL CORPORATION

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July 13, 2016

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Felicia Marcus, Chair
Tom Howard, Executive Director
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

Matthew Quint
Division of Water Rights
State Water Resources Control Board
PO Box 2000
Sacramento, CA 95812-2000

Re: Cease and Desist Order extension

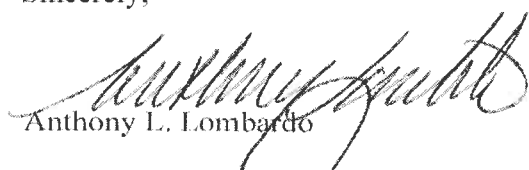
Dear Ms. Marcus, Mr. Howard and Mr. Quint:

We represent the owners and operators of Carmel Valley Ranch and support the positions taken by the Monterey Peninsula Water Management District, Monterey County Hospitality Association, Monterey Peninsula Regional Water Authority, City of Monterey, California American Water Company and many others on the proposed CDO extension.

Our clients are very concerned with the proposal to limit any change of use to the lesser of a five year (2008-2013) metered average or the MPWMD's fixture unit count. The hospitality business is cyclical in nature and is driven largely by the state and national economy. The 2008-13 period proposed to be used was a low point in our economy and as a result occupancies and water use was significantly less due to that economic downturn. To limit future changes of use to the water that was used during that time will have a substantial adverse impact on their business and on many others.

Carmel Valley Ranch has strictly adhered to the Monterey Peninsula Water Management District's regulations and has stayed well within their allowable water use. They have made a large financial investment to save significant amounts of water over the years through fixture retrofits, replacing equipment, improved irrigation practices and landscape modifications. They have been able to use some of that saved water to grow and revitalize their business. They believe that business like theirs should not be constrained by outdated water use averages but should be able to continue to operate within the current Monterey Peninsula Water Management District and local land use rules.

Sincerely,


Anthony L. Lombardo

ALL/gp