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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 2016-0016	SUPPLEMENTAL MATERIALS IN SUPPORT OF APPLICATION FOR ORDER MODIFYING STATE WATER BOARD ORDERS WR 2016-0016 and WR 2009-0060 (CEASE AND DESIST ORDER) SUPPLEMENT No. 3

This Supplement No. 3 to the Monterey Peninsula Water Management District's (District) Application for Order Modifying State Water Board (SWRCB) Orders WR 2016-0016 and WR 2009-0060 (Application) dated October 21, 2025 provides an update on current water supply conditions on the Monterey Peninsula at the midway point of the 2026 Water Year.

I. Cal-Am has Barely Utilized its Carmel River Water Right

As of March 31st – six months into the water year – Cal-Am has utilized only 27% of its base water right on the Carmel River and 19% of its native water right from the Seaside Basin. This is shown in the Table below and Attachment A, hereto.

WY 2026 Thru March 31

	Available	Production	Utilization
Carmel River	3,376	928	27%
Table 13	215	215	100%
Mal Paso	86	44	51%
Seaside Basin	1,466	281	19%
Pure Water Monterey	4,800	2,628	55%
Sand City	200	57	29%
Storage	8,682	-	0%

II. Storage has Continued to Grow During the Year

Storage as of April 30th will be at 8,975 AF as shown in Attachment B. That amount is approximately the total customer demand in 2025. During the first half of the 2026 Water Year reserves were increased by 916 AF in the Aquifer Storage & Recovery program and an additional 400 AF to the Pure Water Monterey Operating Reserve.

III. Urban Water Management Plan Indicates Storage will Continued to Grow

As a wholesaler serving more than 3,000 AFY the District is required to file an Urban Water Management Plan (UWMP) every five years. The UWMP indicates that stored water will rise over the next two decades.

Attachment 3, which shows Table 6-4 of the UWMP indicates stored ASR water steadily rising over the next 25 years. The District realizes the ASR stored water value appears high at the end of the project period. In the five years since 2021, if all four injection wells had been in injection mode, the average annual injection would have been 1,220 AFY indicating the stored values can be realized. Reliability of Cal-Am facilities can affect annually delivered ASR water. As previously stated, annual ASR delivery is currently constrained by the injection wells' capacity, approximately 66% of the capacity without all injection wells available. While new production wells are being constructed by Cal-Am, the District's UWMP conservatively assumes annual ASR delivery through 2029 at 66% of the CPUC-determined delivery capacity.

Future infrastructure issues are expected to be mitigated by stored water. The stored water could be less if it is used in-lieu of another supply or if new equipment issues arise that limit injection. As shown in Attachment 4, which is Table 7-3 of the UWMP, the District anticipates existing supplies will meet demands during normal, single-dry, and multiple-dry years. The high supply is due to the region's demand being less than available supplies beginning Water Year 2021. Combined with additional supply from the 2025 completion of the Expansion of the PWM project, stored water can build at a rapid rate. Regardless, this abundance of water is a new situation for the Monterey Peninsula and somewhat temporary until demand catches up with available supply. It will require time and discussion to manage the abundance in a manner that is cost effective for the public and beneficial to the water resources.

The District's draft UWMP can be found here:

https://www.mpwmd.net/wp-content/uploads/MPWMD_2025_UWMP_DRAFT_4-24-26.pdf

The District filed the Application over six months ago; it deserves immediate action. The Cease and Desist Order continues to directly impair the ability of the community to build homes and create jobs. Changed facts and circumstances warrant close review and consideration.

As the Applicant, the District asks the SWRCB to expeditiously review and act on the District's Application. Please consider expeditious review of the Application.

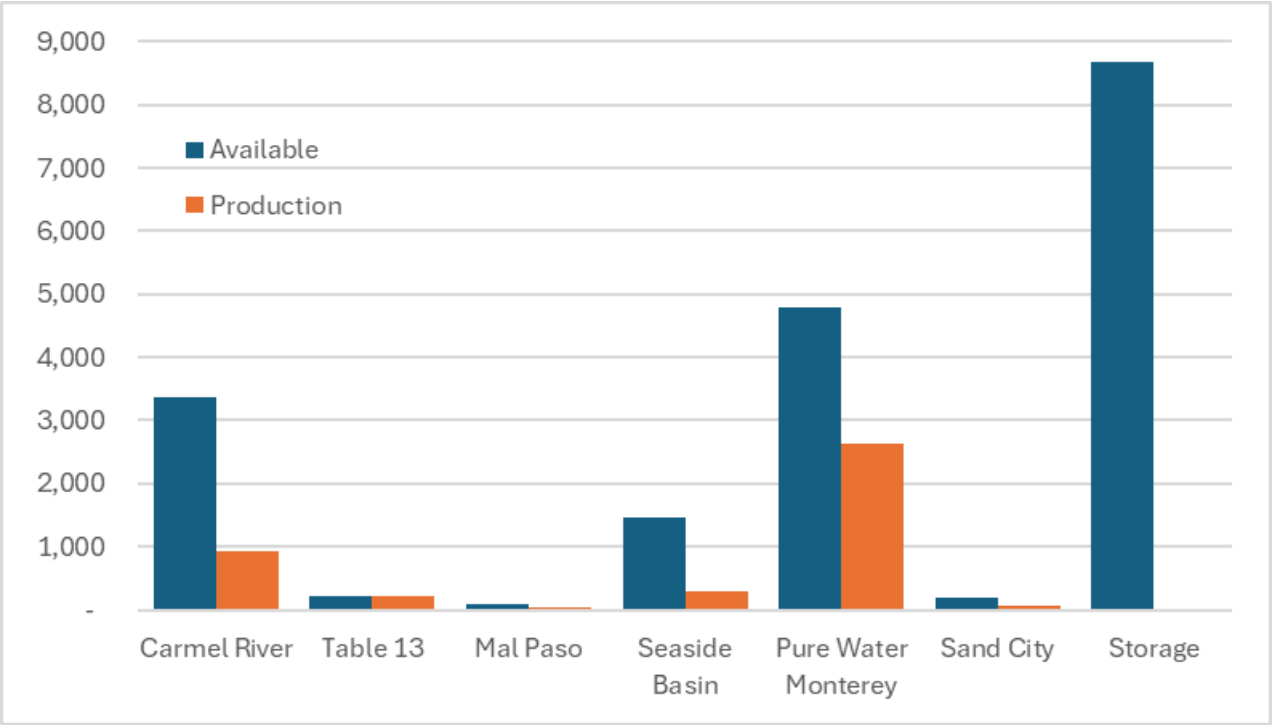
Respectfully submitted this 29th day of April 2026.

By: _____

David C. Laredo,
Office of General Counsel
Applicant: MONTEREY PENINSULA WATER MANAGEMENT DISTRICT

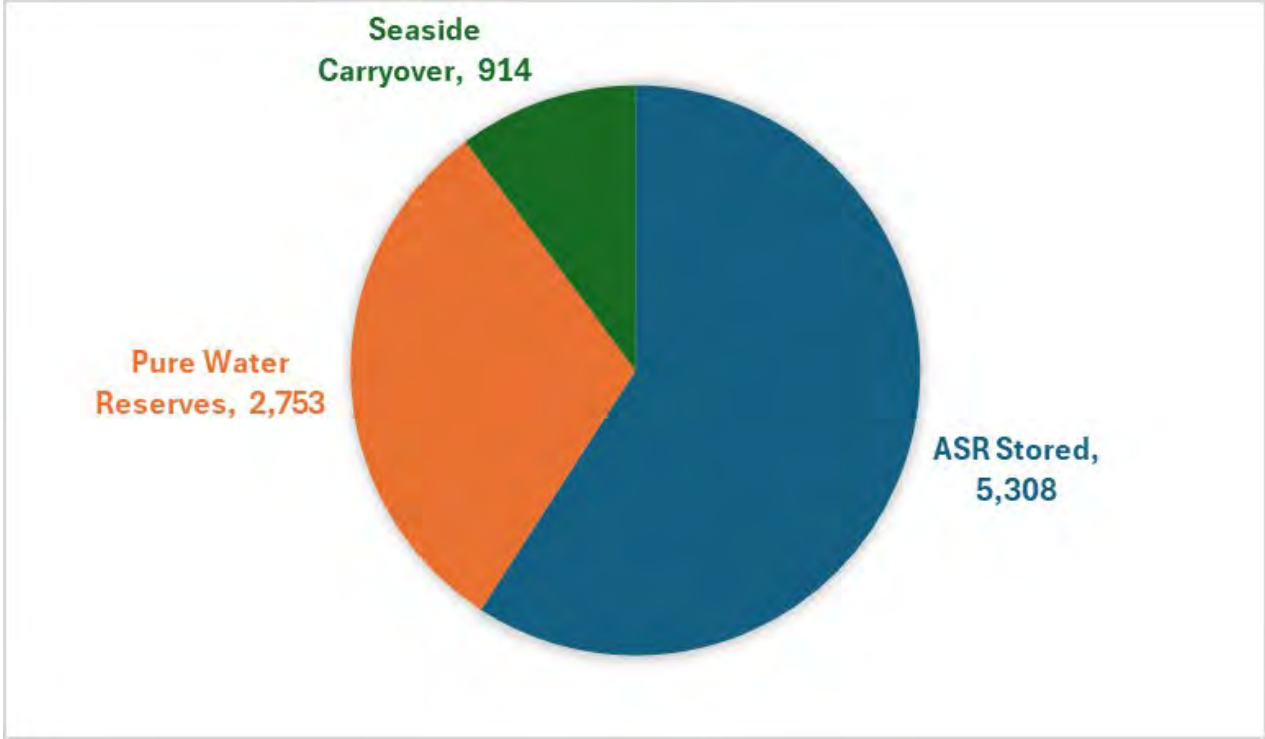
Attachment A

Use of Available Supplies
Thru 50% of Water Year 2026
(in Acre-Feet)



Attachment B

Storage Available
As of April 30, 2026
(in Acre-Feet)



Attachment 3

District's 2025 UWMP

Table 6-4. Projected Wholesale Supplies (AF)
(DWR Table 7-1)

	2030	2035	2040	2045	2050
Normal Year					
PWM Annual Deliveries	5,750	5,750	5,750	5,750	5,750
MPWMD Operating Reserve[1]	2,875	2,875	2,875	2,875	2,875
ASR Annual Deliveries	1,210	1,210	1,210	1,210	1,210
ASR Storage[2]	7,597	13,647	19,667	25,747	31,797
Single-Dry Year					
PWM Annual Deliveries	5,750	5,750	5,750	5,750	5,750
MPWMD Operating Reserve[1]	2,530	2,530	2,530	2,530	2,530
ASR Annual Deliveries	100	100	100	100	100
ASR Storage[2]	7,597	13,647	19,667	25,747	31,797
Multi-Year Drought [3]					
PWM Annual and MPWMD Operating Reserve Yr 1	8,280	8,280	8,280	8,280	8,280
ASR Annual and Storage Yr 1	7,697	13,747	19,767	25,847	31,897
PWM Annual and MPWMD Operating Reserve Yr 2	7,935	7,935	7,935	7,935	7,935
ASR Annual and Storage Yr 2	7,797	13,847	19,867	25,947	31,997
PWM Annual and MPWMD Operating Reserve Yr 3	7,590	7,590	7,590	7,590	7,590
ASR Annual and Storage Yr 3	7,797	13,847	19,867	25,947	31,997
PWM Annual and MPWMD Operating Reserve Yr 4	7,245	7,245	7,245	7,245	7,245
ASR Annual and Storage Yr 4	7,797	13,847	19,867	25,947	31,997
PWM Annual and MPWMD Operating Reserve Yr 5	6,900	6,900	6,900	6,900	6,900
ASR Annual and Storage Yr 5	7,797	13,847	19,867	25,947	31,997

1. Operating Reserve is shown at the start of the dry period; it will decrease by 345 AF every dry year and is rebuilt due to excess deliveries in wet and normal years.
2.ASR Storage is shown at the start of the dry period; it will be 100 AFY the first two years of the period and 0 AFY for the last three years. It is rebuilt due to increased deliveries during wet and normal years.
3. See Tables 6-2 and 6-3.

Attachment 4

District's 2025 UWMP

Table 7-3. Comparison of Potable Supplies and Demands Multiple Dry Year (AF)
(DWR Table 7-4)

	2030	2035	2040	2045	2050
Supplies					
Year 1	15,977	22,027	28,077	34,127	40,177
Year 2	15,732	21,782	27,832	33,882	39,932
Year 3	15,387	21,437	27,487	33,537	39,587
Year 4	15,042	21,092	27,142	33,192	39,242
Year 5	14,697	20,747	26,797	32,847	38,897
Estimated Demands (Table 4-3 and 4-5)					
Year 1	5,750	5,750	5,750	5,750	5,750
Year 2	5,750	5,750	5,750	5,750	5,750
Year 3	5,750	5,750	5,750	5,750	5,750
Year 4	5,750	5,750	5,750	5,750	5,750
Year 5	5,750	5,750	5,750	5,750	5,750
Difference (Supply - Demand)					
Year 1	10,227	16,277	22,327	28,377	34,427
Year 2	9,982	16,032	22,082	28,132	34,182
Year 3	9,637	15,687	21,737	27,787	33,837
Year 4	9,292	15,342	21,392	27,442	33,492
Year 5	8,947	14,997	21,047	27,097	33,147
Difference as % of Demands					
Year 1	178%	283%	388%	494%	599%
Year 2	174%	279%	384%	489%	594%
Year 3	168%	273%	378%	483%	588%
Year 4	162%	267%	372%	477%	582%
Year 5	156%	261%	366%	471%	576%