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November 22, 2011

Vicki Morris
Aromas Water District
387 Blohn Avenue
Aromas, CA 95004

SUBJECT: MND FOR SPHERE OF INFLUENCE AMENDMENT AND ANNEXATION
OF OAK RIDGE AND VIA DEL SOL SUBDIVISIONS

Dear Ms Morris:

LandWatch Monterey County has reviewed the proposed project which includes:

1. Sphere of Influence (SOI) amendment to add approximately 1,720 acres within the Aromas Water District's SOI boundary within Monterey County.
2. Annexation of two existing subdivisions to the Aromas Water District and provision of domestic water service to approximately 72 existing homes; the annexation areas are within the proposed SOI amendment area.
3. Creation of assessment district to finance improvements for proposed annexation areas.
4. Construction of water system improvements to serve the proposed annexation areas, which includes extension of water lines and construction of accessory water system improvements.

We have the following comments on the project:

Proposed delivery of water is an illegal appropriation/export out of the overdrafted groundwater Pajaro Valley Groundwater Basin to Via del Sol. Neither PVWMA nor Monterey County has the authority to grant approval for the out-of-basin transfer of Pajaro Valley Groundwater into the Moro Cojo/Salinas Valley Watershed. The PVWMA authorizing statute prohibits out of basin transfers, and there is no justification under California law or CEQA that allows PVWMA to ignore the overlying rights of Pajaro Valley landowners.

Thank you for the opportunity to review the document.

Sincerely,

A handwritten signature in black ink, appearing to read "Amy L. White".

Amy L. White, Executive Director

Cc: Monterey County LAFCO