

Re: Rancho Roberto, Th13d

Dayna Bochco, Chair
and Members of the California Coastal Commission

Dear Chair Bochco and Coastal Commissioners:

I urge you to uphold the appeals and deny the 26-unit Rancho Roberto residential subdivision application.

The project cannot be approved pursuant to the Local Coastal Plan.

The Local Coastal Plan does not allow non-priority development to be approved in areas of severely overdrafted water supply, as here. (LUP Policies 2.5.1, 2.5.2.3, 2.5.3.A.2, 4.3.5.4 4.3.5.7; North County IP sections 20.144.140.A.1, 20.144.070.E.11, 20.144.020.VVVV.) Groundwater levels in much of the basin are below sea level.

As stated in the CCC report:

“North Monterey County has had severe groundwater overdraft problems for decades. it is unclear whether the proposed project even has an identifiable and available water supply, including because the water provider in the area has voiced concern over whether it would be able to provide a will-serve letter to any new proposed connection from its existing wells, including due to detection of chromium 6 in exceedance of water quality standards. The proposed project would authorize a subdivision allowing for 26 future residences, which would demand water from an already severely overdrafted groundwater basin. ... [T]he project cannot be found to have a long-term and adequate water supply, and cannot be found to be served by water from a groundwater basin in a safe yield state. ... [T]he proposed 26-lot residential subdivision represents a low LCP-priority land use in an area with known water supply deficiencies. When such a combination results, the LCP affirmatively requires the proposed development to be denied.”

The site contains ESHA. The wetland area is a sensitive freshwater resource that is habitat for several special-status listed animal species. The applicant proposes to convert the wetland to a stormwater detention pond.

The project is inconsistent with LCP policies protecting groundwater quality.

Other issues or claims are not relevant because the fundamental issue is compliance with the LCP, and this project does not comply.

The project EIR should not be relied upon because the EIR has been challenged in Court and the Court has not yet determined whether the EIR was adequate.

The project cannot be approved pursuant to the LCP. Please uphold the appeal and deny the project.