



January 6, 2017

Dayna Bochco, Chair  
California Coastal Commission  
Central Coast Office  
725 Front Street, Suite 300  
Santa Cruz, CA 5060

Subject: Rancho Roberto Subdivision (A-3-MCO-05-027)

Dear Chair Bochco and Commissioners:

LandWatch Monterey County supports staff's recommendation that the Commission finds the appeals raise a substantial issue, that the Commission take jurisdiction over the Coastal Development Permit (CDP) application, and that the Commission, on de novo review, deny the CDP.

The Rancho Roberto Subdivision would subdivide a 13.3-acre parcel into 27 lots; construct a stormwater detention basin within a wetland in the open space parcel; construct road, water, and sanitary sewer infrastructure; and demolish a single-family dwelling, barn, and several accessory buildings. After project approval by the Monterey County Board of Supervisors, Friends and Neighbors of Elkhorn Slough (FANS) challenged the 2005 EIR. However, the EIR litigation was stayed pending appeals to the California Coastal Commission by FANS and two Coastal Commissioners.

The proposed project would require water from a severely overdrafted groundwater basin, and it would not have a long-term water supply as required by the Local Coastal Program (LCP). Groundwater overdraft has continued to worsen since project approval, and in January 2016 the Department of Water Resources officially designated portions of the Pajaro Groundwater Basin, including the area in which the proposed project is located, as "critically overdrafted".

The project would convert an existing riparian drainage swale into an underground culvert and replace an existing wetland with a stormwater detention basin. Neither use is allowed in riparian corridors and wetlands per the LCP. The project would also authorize extensive grading and landform alterations converting the area's scenic natural wetland and riparian habitats into engineered, structural elements and would replace the site's existing grazing lands with future residential development, inconsistent with LCP requirements to protect North County's agricultural landscape.

In conclusion, the project is not approvable under the LCP. Please support staff's recommendation and deny the application.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael DeLapa".

Michael DeLapa  
Executive Director