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November 2, 2017

**W15a**

Dayna Bocho, Chair - Sent By Email c/o: [kevin.kahn@coastal.ca.gov](mailto:kevin.kahn@coastal.ca.gov)  
California Coastal Commission  
45 Fremont Street #2000  
San Francisco, CA 94105

RE: Appeal No. A-3-MCO-09-009 Rancho Los Robles Subdivision  
URGE APPROVAL OF STAFF RECOMMENDATION / DENY APPLICATION

Dear Chair Bochco and Members of the Commission:

The Commission will be considering the above-noted application at its meeting on November 8, 2017. I am writing on behalf of LandWatch Monterey County, a nonprofit organization whose mission is to promote sound land use policies that will help the County achieve long-term economic vitality, high agricultural productivity, environmental health, and social equity. While there are a number of other important issues involved in the application, the key issue is the very significant and continuing overdraft of the groundwater basin serving the North County area in which the proposed development would take place.

We emphatically agree with the staff report: “when water deficiencies of the type currently present in this area exist, the LCP affirmatively requires the proposed development to be denied.” We urge the Commission to adopt the staff recommendation, and to deny the application.

LandWatch and Friends and Neighbors of Elkhorn Slough (FANS) have been involved with this application from the very start, and we were distressed when the Planning Commission’s decision to deny the proposed project was reversed by the Board of Supervisors. LandWatch and FANS appealed Monterey County’s approval of the proposed Rancho Los Robles Subdivision because the proposed subdivision was (and is) inconsistent with the North County Coastal Land Use Plan, and particularly because there is no sustainable water supply for the project. LandWatch continues to oppose the project for these same reasons.

The North County Coastal Land Use Plan requires, among other things, that:

- New developments be controlled to a level that can be served by an identifiable, available, and long-term water supply (Key Policy 2.5.1);
- Development levels that generate water demand exceeding safe yield of

local aquifers are only allowed once additional water supplies are secured (LUP Policy 2.5.2.3);

- The County should reduce the remaining build-out to limit groundwater use to the safe yield level or, if required, in order to protect agricultural water supplies to support priority agricultural uses (LUP policy 2.5.3.A.1); and
- New development be phased so that existing water supplies are not committed beyond their safe long-term yields (LUP Policy 2.5.3A.2.).

The staff report furnished to the Commission outlines the many reasons that the current application should be denied. LandWatch urges you to support the staff recommendation, and thanks you for taking seriously the Coastal Act and the LCP land use policies that both the County and the Commission have prudently directed must be followed, with respect to proposed development in Monterey County's North County area.

Very truly yours,



Gary A. Patton, Attorney for  
LandWatch Monterey County