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

Subject: Sunridge Subdivision Appeal (A-3-MCO-04-054-E3)

W16a

Dear Commissioners:

LandWatch Monterey County and Friends and Neighbors of Elkhorn Slough appealed the Monterey County's approval of the project in 2004 based on requirements of the North County Coastal Land Use Plan ("No Co Coastal LUP") and lack of a sustainable water supply. We continue to oppose the project for these same reasons and for that reason we urge you to adopt the staff recommendation.

The No Co Coastal LUP 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 (No Co Coastal LUP Policy 2.5.2.3);
- New development be phased so that existing water supplies are not committed beyond their safe long-term yields (No Co Coastal LUP Policies 2.5.2.3, 4.3.5-7, 4.3.6.D.5); and,
- 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 (No Co Coastal LUP policy 2.5.3.A.2).

We urge you to support the staff recommendation to find changed circumstances with regard to an extension of the permit approvals. The staff report lays out the history of the project and the facts that show the changed circumstances that affect the consistency of the subdivision with the North County No Co Coastal LUP policies. In addition to the changed circumstances identified by staff including the Pajaro Valley Groundwater Basin identified as "critically overdrafted", the applicant's failure to retrofit other residential projects, and amendments to the No Co Coastal LUP prohibiting second units, we note the following:

Seawater intrusion in the Salinas Valley Groundwater Basin remains a critical issue. Additionally, the 180 and 400-foot aquifers in the northern part of the Basin are identified as critically overdrafted under the Sustainability Groundwater Management Act of 2014. Plans for sustainability for the Pajaro Valley Groundwater Basin and the Salinas Valley Groundwater Basin should be approved and implemented pursuant to the Act's requirements prior to approval of any new water-demanding projects.

Thank you for your consideration.

Sincerely,



Michael DeLapa  
Interim Executive Director

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OCT 26 2016

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