

Cambria Community Services District  
Cambria, California 93428  
Comments on request for CEQA Categorical Exemption  
GEO - Technical Hydrological Project  
Hearst State Beach/ Santa Rosa Creek/Lagoon  
Resolution 01-2010

January 5, 2010

I would like to comment on a couple of items from the document sent to the California Coastal Commission by the Army Corps of Engineers seeking a 'categorical exclusion'. The first point should be quite obvious to anyone viewing the attached photographs of the proposed test site (pages 29, 30 and 32 of CCSD board packet). There are pictures looking south, at an expanse of sand, pictures looking north, at an expanse of sand, and nothing looking seaward at the rocky reef at the mouth of Santa Rosa Creek. In fact, the document incorrectly states that "the intertidal area seaward of the study site consists of sandy beach".

The document notes that the site is "interspersed with isolated rocky features". In fact the rocky intertidal zone is a continuation of the reef that extends to Cambria rock and beyond. Ecologically this site cannot be seen as isolated. The one sentence on "epibiota" is incomplete and ignores one of our most treasured invertebrates, the black abalone, which lives on those rocks. Further, all snails, chitons, limpets, crabs, mussels and hundreds of other species are ignored.

Then there are the fish. The document notes the applicability of the Magnuson-Stephens act and curiously ignores all applicable state management measures. Starting with the 1998 MLMA (Marine Life Management Act), the state of California began a process to ensure the sustainability of marine resources within the three mile state marine jurisdiction. One of the first products of that act was the Nearshore Fishery Management Plan, enacted in 2002. In it the state focused on 19 nearshore species of rockfish, several of which live in front of Shamel Park. The state took over responsibility for managing three of these species and manages jointly the other sixteen. It is the State of California that must be satisfied as to the "impact" of drilling activities not Magnuson-Stevens.

Further, the 1999 passage of the MLPA (Marine Life Protection Act), a companion of the MLMA (Marine Life Management Act), is relevant here. The implementation of this act at this location was approved by the California Fish and Game Commission in September 2007. The Cambria State Marine Conservation Area

was created. It encompasses much of the nearshore from Fiscalini ranch to Pico Creek and encompasses the beach in front of Shamel Park.

The Army Corp. document incorrectly states that the “nearest Critical Habitat is over a mile to the north”. Not according to NMFS (National Marine Fisheries Service – part of NOAA) , site ID#1217105355685, which designates critical habitat for the south central California steelhead immediately adjacent to all proposed activities. In fact drilling is proposed in areas that have historically been the Santa Rosa main creek channel. The California Coastal Records Project houses several images (such as 198630287) that show Santa Rosa creek flowing adjacent to Shamel Park. The tendency of fast flowing water to move in a straight line to the sea cannot be denied.

This time of year marks the return of south-central California steelhead to our local creeks. These fish are often found near creek mouths waiting for the sand and gravel bars to be breached. This marks the beginning of a reproductive cycle that has been going on for millennia. The rocks in front of Shamel Park also host large populations of several varieties of surf perch. Most of these give birth to live young during the winter months. Interruptions to these critical life processes need to be avoided at all costs.

A thorough environmental assessment is the least we could do to protect our marine resources for generations to come.

Thank you.

**Jim Webb**  
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