

From: [Christine Heinrichs](#)
To: [BoardComment](#)
Subject: Strategic Plan comments
Date: Monday, February 12, 2024 10:50:19 AM

To the Board:

In response to your solicitation for public input to the Strategic Plan, I have the following suggestions:

To support the Strategic Goal for Water, to “Meet the ongoing challenges of effectively and reliably managing water resources in our sensitive ecosystem,” the district should make resolving the Coastal Commission’s Notice of Violation, Violation File No.: V-3-21-0105, dated April 19, 2022, a priority. Resolving the issues raised in the NOV is crucial to other water use planning.

The NOV found that the district is extracting too much water to maintain adequate water levels, with resulting impacts to fisheries and riparian vegetation. It charges that the district’s extraction of water from Santa Rosa Creek wells violates its CDP No. 132-18.

The violations also violate the County’s LCP.

It states that “studies show that both of these creeks are significantly suffering.” The excessive extractions are also damaging fisheries, riparian and other habitat. Lacking biological studies leaves the district lacking documentation of change, either for better or worse.

“CCSD is in violation of its CDP on both these points that has led for decades and is continuing to lead to unpermitted and significant resource impacts,” the NOV says.

The Coastal Commission has not pursued resolution of this NOV, in an informal arrangement, so long as the district does not issue any more Intent to Serve letters. While that provides a temporary solution, the NOV should be resolved and entirely satisfied.

The first item on the list of how to resolve the NOV is

To begin to resolve this CDP violation, please do all of the following:

1. Immediately cease from issuing any will-serve letters for any new water using development, retract any will-serve letters that are currently active for any projects that do not already have a CDP, and provide evidence that this has been accomplished by May 20, 2022.

Next is:

2. Submit a water extraction and resource protection plan for Executive Director review and approval explaining how CCSD plans to achieve compliance with CDP No. 132 18 as it relates to the protection of fisheries, riparian resources, and all related habitats associated with both San Simeon Creek and Santa Rosa Creek; the use of Santa Rosa Creek wells only as allowed by the CDP; irrigation to maintain riparian habitat; and service to the Tract 1804 properties. Such plan must include implementation details, specific and measurable steps, and a timeline to reach CDP compliance, and shall be submitted no later than June 20, 2022.

I refer you to the documents on the Cambria CSD website for full information.

https://www.cambriacsd.org/california-coastal-commission-notice-of-violation-no-v-3-21-0105#body_file-f03423a1-4e2e-4109-b296-b27a66e19da5

This Notice of Violation can be a guide to resolving Cambria’s water responsibilities to local

habitat. Please include resolving it in the Strategic Plan.

Thank you.

--

Christine Heinrichs

From: [Christine Heinrichs](#)
To: [BoardComment](#)
Subject: Strategic Plan comments
Date: Monday, February 12, 2024 10:50:45 AM

To the Board:

I suggest that the board add to its Strategic Plan disbanding the Water Wait List. The district should recognize its water limits and make a decision to conclude this dysfunctional creation. The board is more likely to get a favorable outcome, with as little rancor and litigation as possible, by directing the process. The WWL carries a weight of suggested benefits, which creates potential cause of action legally. It's a source of lawsuits.

The district has a finite amount of water. The Coastal Commission has evaluated its water resources as not quite adequate to serve current residents and commercial needs, while leaving enough in the creeks to support protected wildlife and its habitat.

The district has an obligation to pursue supplemental sources of water. Its dedication to the EWS testifies that it has made those efforts, but failed to produce supplemental water to support adding connections. The community has paid millions in its search, and has a continuing commitment of more than a million dollars a year, plus payments on the EWS/SWF/WRF.

Barring piping or trucking water in, the district's supply is limited to existing users. Operating the plant to reprocess wastewater may be worthwhile, but it will not provide supplemental water to support adding new connections from the WWL. Time to disband it and relieve the district of this source of contention.

Disbanding the WWL should be added to the district's goals.

--

Christine Heinrichs