



December 1, 2008

Mr. Ken Thomas
City of Santa Cruz
Planning and Community Development Department
809 Center Street, Room 206
Santa Cruz, CA 95060

Subject: Notice of Preparation of an Environmental Impact Report

Dear Mr. Thomas:

Thank you for sending the Local Agency Formation Commission of Santa Cruz County (LAFCO) a Notice of Preparation of an Environmental Impact Report, dated November 3, 2008, regarding the City of Santa Cruz Sphere of Influence Amendment. LAFCO is a responsible agency since it has received two related applications. Application No. 928 is the City of Santa Cruz's application to amend its Sphere of Influence to include a portion of the North Campus. Application No. 929 is the University of California's application to receive water and sewer services from the City of Santa Cruz to a portion of the North Campus outside the City Limits.

LAFCO concurs that an environmental impact report is the proper document to prepare for this project in order to comply with the California Environmental Impact Report. As a responsible agency, LAFCO will use the EIR that the City is preparing to review the two pending applications: No. 928 Sphere Amendment and No. 929 Extraterritorial Water and Sewer Service. Thus, LAFCO's first comment is to request that the project description be clarified to include the extraterritorial water and sewer service application.

Operating under State law, LAFCO's principal authority is to regulate the boundaries and service areas of cities and special districts. In addition to the policies in the Local Government Reorganization Act, LAFCO will use the following local policies when reviewing the two pending applications:

- Sphere of Influence Policies and Guidelines (attached)
- Policies and Regulations for Agencies to Provide Services to Private Parties Outside Agency Boundaries (attached).

The EIR would be most useful to LAFCO if the data were arranged in a manner that quantifies impacts (amount of water usage, amount of sewage generated, traffic, etc.) both inside the current city and outside the current city limits. In that manner, LAFCO will have data specific the two applications pending at LAFCO.

LAFCO concurs with the list of probable environmental effects and secondary impacts as stated in the Notice of Preparation. Since LAFCO is not a resource agency, it will carefully consider the potential impacts and mitigations as identified by the resource agencies.

Looking forward to potential environmental impacts, policy issues, and mitigation measures, LAFCO requests consultation during the drafting of the EIR on the following matters:

1. Annexation of existing residential halls

The County Elections Office reports that the City boundary bisects student residential buildings at the northern tips of the Crown/Merrill Apartments and College 9. This requires extra work by the Elections Office to split each residential complex into different voting precincts, and inconveniences the voters who are separated from the rest of the UC precincts. The draft EIR should identify and evaluate one alternative of annexing the existing residential buildings.

2. Drought mitigations

As recognized in the Notice of Preparation, the City of Santa Cruz has a water supply problem during droughts. The Notice has identified potential mitigation measures that the University would pay certain water fees, would follow use restrictions, and abide by any drought-related connection moratoria. Another potential mitigation to consider concerns enrollment growth during any moratoria. Other possible mitigations should be considered that would prevent increases in off-campus water demand.

3. Coolidge Drive

Coolidge Drive, the arterial that runs from the main entrance on High Street up the east side of the campus is currently a County-maintained road. Since Coolidge Drive solely serves the University, and almost all of the drive is located beyond the UCSC guard station, another potential mitigation measure to consider is that the University take over maintenance of Coolidge Drive.

4. Forest loss

The Environmental Impact Report prepared for the Long Range Development Plan identified elimination of up to 73 acres of forest as potentially resulting from the full implementation of the Long Range Development Plan. The EIR should consider establishing either a threshold of significance for the cumulative loss of forest lands, or another means of addressing the cumulative loss of forest.

I am sending these comments on behalf of LAFCO within the timeline specified in your Notice of Preparation. I will place this letter on the next LAFCO agenda (December 8, 2008; 9:30 a.m.; 809 Center Street, Santa Cruz) and will send a follow-up letter soon after that meeting if the LAFCO Commission wishes to revise LAFCO's comments.

Please contact me if you have any questions about this letter, and when you are ready for consultation during the development of the draft EIR.

Very truly yours,

Patrick M. McCormick
Executive Officer

cc: Richard Wilson, Santa Cruz City Manager
Thomas Vani, UCSC Chancellor's Office

Attachments