

Humboldt Community Services District

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February 15, 2008

County of Humboldt
Planning Commission
3015 H St
Eureka, Ca 95501

Subject: Community Infrastructure & Services
Technical Report, November 2007

Dear Honorable Planning Commission:

During the Public Hearing and Planning Commission meeting of January 31, 2007, which considered the General Plan Update Infrastructure and Services Technical Report, several comments occurred that requires further discussion and clarification.

The Humboldt Community Services District (HCSD) is the major water and sewer provider in the areas surrounding the City of Eureka. This area has the greatest potential for growth in the County and as such, will impact our infrastructure and ability to serve. It is imperative that we properly plan our facilities and provide adequate capacity.

Sphere of Influence (see attached map exhibit) – The District is requesting that the General Plan Update support its request before the Local Agency Formation Commission (LAFCo) to expand its Sphere of Influence. Currently the District's Sphere and Boundary are coincident and do not allow us to consider or serve additional customers beyond these limitations. The Sphere of Influence is defined in State Law and generally provides for the following planning guidelines:

- The sphere is to be a plan for the probable physical boundaries and service area of a local government agency.
- The sphere of influence is an important benchmark because it defines the primary area within which urban development is most likely to occur.
- That a Sphere of Influence change would facilitate planned, orderly, and efficient patterns of land use or provision of services.
- The Sphere of Influence acts as a planning guideline for organized community services, the present cost and adequacy of these services, and the probable future needs for governmental services and controls in the area.

One of the primary considerations that LAFCo will consider in our application for Sphere of Influence change is the consistency with county, general, and specific plans and the consideration of regional growth goals and policies. This is why it is important for the General Plan Update to support our request for Sphere of Influence expansion. Without this support, LAFCo may deny our request and we would be unable to serve areas where residents have requested public water due to water quality problems or plan for future urban growth in areas that the District believes are most likely to occur. In addition, General Plan support and its accompanying environmental determination will reduce the cost and scope that the District must provide in support of our LAFCo application. Residents requesting public water because of health and safety concerns (water quality problems) will be the ones paying for not only the infrastructure facilities (water main), but also the LAFCo processing and CEQA environmental determination.

The Freshwater Valley is a good example of residents solving their water quality problems by forming the Freshwater Assessment District, conducting an Environmental Impact Report (EIR), effecting the Sphere of Influence change before LAFCo and constructing the facilities. Because the existing 1985 General Plan or Freshwater Specific Plan did not mention (or support) public facilities in this area, it was necessary to provide the full EIR at a cost of approximately \$150,000 (the infrastructure cost was an additional \$2,300,000). It is interesting to note two things about the Freshwater Assessment District:

- It has been stated that bringing public water into a rural area encourages development, yet there have been fewer building permits issued after public water improvements than before.
- Water is extremely important to a person's health, safety and well being despite the relatively expensive water connection fee of some \$12,000. Every Freshwater resident immediately signed up, received clean, safe, public water, and was thankful for receiving it, after many years of poor water quality.

We need to expand our Sphere of Influence to further serve additional resident's request for public water (similar to Freshwater).

Area E & F Mapping and Planning – Apparently, the statement was made that the District was requesting that its *Boundary* be expanded to include Areas E & F and that the District was planning for such by providing land planning down to individual lot development in anticipation of this. The District is only requesting that the General Plan Update support its request before LAFCo for a *Sphere of Influence* expansion. The District is not requesting a boundary change nor suggesting any zoning or density changes in the General Plan Update. The District did perform sewer capacity planning for this urban fringe area because of the following reasons:

- This area is designated as an "Urban Study Area" in the General Plan Update.
- The area is adjacent to existing sewer and water facilities.

- Once the Winzler, Reardon, Robinson (now Forster-Gill) and McKay tracts develop (with help from the proposed Martin Slough Interceptor Project), Areas E & F would be the next most logical location for the *orderly and efficient* development of probable future long-term growth.
- The City of Eureka and District are currently conducting an Infrastructure Facilities Study to determine the capacity of the existing sewage collection system and existing and proposed expansion requirements for the Elk River Wastewater Treatment Plant. We need to know what impact inclusion of these proposed areas may have on expansion capacity and cost.

This last point is important; sewer collection systems and treatment plants are expensive and require specific consideration in order to provide adequate capacity and environmental protections when anticipating long-term growth.

The District is also studying the concept of consolidating and siting sewer service facilities for the (1995 Eureka Community Plan) "McKay" Tract developments into Areas E & F (see attached plan).

In summary, we respectfully request that the Planning Commission consider and recommend that the General Plan Update support the District's request before LAFCo for a Sphere of Influence expansion.

Very truly yours,

Humboldt Community Services District



Stephen M. Davidson
District Engineer