

Humboldt Community Services District

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January 15, 2008

Mr. John Miller, Senior Planner
Humboldt County Community Development Department
3015 H St
Eureka, Ca 95501

Subject: Community Infrastructure & Services
Technical Report, November 2007

Dear John:

Thank you for the opportunity to comment on the Infrastructure and Services Element of the County's General Plan Update relating to our district. Attached, for your consideration, are the District's suggested revisions to the HCSD infrastructure portion of the plan.

The following is a general statement of the philosophy behind the requested changes and the reasoning for inclusion and support of the District's request to expand its Sphere of Influence:

Information - The majority of requested changes consist of corrections of factual information specific to our system including capital improvements, system operation and proposed infrastructure to serve existing and proposed growth.

Complicated Descriptions - We have suggested that many sections of the plan be deleted, as they are too complicated or technical for the average reader to comprehend. In addition, we feel that many of these sections and paragraphs are not necessary as part of the General Plan and only serve to distract the reader from the important information we wish to convey and have them understand as a basis for good planning decisions. For example, the section on the Martin Slough Interceptor (MSI) includes so much technical information that the premise of the project and the differences in the capacity and growth projections seem to be lost in the minutia.

Growth Projections - The County and District have worked very hard to arrive at realistic growth projections that are consistent with zoning, existing constraints and as confirmed in the field as realistic. This exercise resulted in a realistic number for projected planned growth for each planning area. Thus, we believe it best to use the unit counts that were developed rather than a range of possible growth projections based on an (assumed) 0.5% to 2.5% housing projection.

Sphere of Influence Expansion – As the County is aware, in 1998 the District requested consideration of a Sphere of Influence Update to include new areas outside its current planning sphere or boundary limits. At that time, the County suggested that we delay the request and include it in the upcoming General Plan Update. The County's premise was that the General Plan Update could potentially support these additional areas. The General Plan Update together with the environmental review could then be used by the District to support its application before the approval agency, LAFCO. We have therefore included these areas (Areas A through L) in the current document and are looking for the County and this General Plan Update to support its inclusion.

As stated in the document, we are proposing specific Sphere of Influence expansion areas for a variety of reasons including:

- Elimination of "Island Areas" that are not contiguous to the planning area in conformance with LAFCO planning guidelines;
- Provide water service to areas with poor water quality as requested by area residents for their health, safety and welfare; and,
- Develop long-term infrastructure planning for areas we believe will be developed in a 50-year development horizon and impact current requests for sewer service and infrastructure.

We would like to elaborate on our request to include Areas E & F (designated the "Ryan Slough Area") and provide the County some justification for including these areas. Areas E & F are located outside the District's Sphere of Influence or boundary limits. The State Cortese-Knox Act requires that to plan for the orderly present and future development needs, that those areas be included within the agency's Sphere of Influence. The North, Mid and South McKay Tracts are currently approved for development within the County's Eureka Community Plan. Providing sewer service to these developments could be accomplished by piecemeal, individual facilities (as has been the case in the past) or regionally planned facilities that can be shared by each of these developments. Areas E & F could be considered the easterly extensions of the already approved McKay Tract developments. They share the same topography, development potential and proximity to urban services. When considering whether to include these areas, we asked ourselves the following question based on the premise that fifty years ago there were no public services or population concentration in the Cutten/Ridgewood area: "If the Eggert and Robinson (area) tracts currently planned for development (some 3200 units) were fully built-out, where would the most logical location for future growth in another 50 years occur?"

Inclusion of the Ryan Slough areas E & F provide us the opportunity to efficiently provide sewer service to *existing* (and future) development and potentially solve the approaching traffic circulation problems. If the County ultimately decides not to include these areas, the District, respectfully requests the County us provide a detailed written explanation for the basis of and reason for its denial.

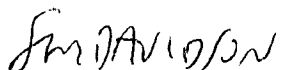
Section 7.3 HCSD and Eureka / Martin Slough Interceptor (MSI) – As stated above, this section contains too much detailed information that may not be appropriate for a General Plan Update. HCSD suggests that a majority of this section be deleted, leaving only that information necessary for sound planning decisions. The District suggests that the following major premises and conclusions be included:

- Description of the City of Eureka owned and operated wastewater treatment plant, of which HCSD utilizes a percentage of the capacity.
- That the Wastewater Treatment Plant (WWTP) is well run, but nearing its design and permitted capacity.
- The City of Eureka and HCSD are cooperating and conducting a Wastewater Facilities Plan Study to determine the capacity limitations and costs to expand the facility.
- Both the City of Eureka and HCSD are aware that the WWTP will need to be expanded in the immediate future to support existing and proposed growth and are working toward this goal.
- The MSI was designed to remedy an environmental problem and sized adequately to also serve approved growth as adopted in the 1995 Eureka Community Plan. This design capacity consideration resulted in the MSI project being viewed “non-growth inducing,” including only proposed growth adopted in the current General Plan but nothing beyond that. That is, the MSI project was designed to accommodate existing and proposed growth only as approved in the 1995 Eureka Community Plan.
- Other infrastructure planning can accommodate additional future growth contemplated in the General Plan Update. It is not necessary, nor correct, to state that proposed additional growth be accommodated only if there is “excess” capacity left in the MSI.
- That the MSI, and previously adopted County General Plan, environmental documents required that the County implement a Traffic Impact Fee on new development prior to new development receiving any sewer connections to the MSI.

Although we have been working with the County for several months on this document, we have had only a short period of time to actually review its final draft form, analyze it, and understand its meaning and intent. We would therefore appreciate additional time to further consider this draft, or subsequent revisions and provide comment.

Very truly yours,

Humboldt Community Services District



Stephen M. Davidson
District Engineer