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Subject: LAFCo COMMENTS ON THE PUBLIC DRAFT RECOMMENDATIONS FOR THE HUMBOLDT COMMUNITY SERVICES DISTRICT SPHERE OF INFLUENCE

Dear Mr. Hull,

Thank you for attending the Commission meeting on March 19, 2014, and providing an informational presentation of the District's public draft sphere of influence recommendations. LAFCo was pleased to learn of the District's sphere review process and public outreach efforts, including your presentation to the Greater Eureka Area Municipal Advisory Committee on March 12.

California Government Code Section 56076 defines a sphere as "a plan for the probable physical boundaries and service area of a local agency, as determined by the commission." Spheres of influence are used by LAFCo as a policy guide in its consideration of boundary change proposals affecting each city and special district in Humboldt County. Other agencies and individuals use adopted spheres of influence to better understand the services provided by each local agency and the geographic area in which those services will be available. Clear public understanding of the planned geographic availability of urban services is critical to the preservation of agricultural and open space land.

Sphere Background

The Commission first adopted a sphere of influence for Humboldt CSD in 1976 to be coterminous with the boundaries of the District, as existed at that time. An expanded sphere was adopted by LAFCo in 1985 to include areas east and south of the District boundaries, which represented a practicable maximum 20-year growth area. A year prior, in 1984, the City of Eureka sphere was adopted by LAFCo to include all of the territory within the boundaries of the Humboldt CSD. The City of Eureka sphere was based on the assumption that the City would ultimately annex all of the territory within the boundaries of the District, thereby consolidating water and sewer services in the greater Eureka area. Several reorganizations options were identified but never evaluated in depth.

More recently, LAFCo prepared a municipal service review for the Humboldt CSD in 2008, and affirmed the District's existing sphere of influence (Resolution No. 08-10). The legislative intent of the municipal service review is to proactively inform the Commission with regard to the availability and sufficiency of governmental services provided within a defined area. This includes, notably, considering whether organizational changes would improve service efficiency and performance.

Draft Proposed Sphere

The District's draft sphere recommendations identify nine sphere expansion areas. LAFCo has reviewed the draft sphere expansion areas and provides the following comments:

1. *Overlapping spheres* – Spheres indicate to local agencies and property owners that, at some future date, a specific area will likely require the services provided by the subject agency. The sphere determination also indicates the agency LAFCo believes to be best situated to serve the subject area. LAFCo supports the reduction of overlapping spheres to avoid unnecessary and expensive duplication of services or facilities, and to provide property owners with an understanding of the ultimate use and development potential of their land.
2. *Future development potential* – The District should evaluate future development potential for existing sphere and proposed sphere expansion areas and document its capacity to provide water and wastewater services in these areas. It may be appropriate to define a service specific zone or overlay to areas where some but not all of the services would be provided due to geography or capacity limitations.
3. *Indianola* – The District should generally describe and analyze service options in the Indianola area. LAFCo supports further agency cooperation and planning surrounding service provision in the Indianola area so an agreement can be made as to which local agency is best suited to provide services. This would be preferred over the adoption of overlapping spheres.
4. *Resource Land* – Spheres should be used to promote the long-term preservation and protection of the county's agricultural and open space resources. To be consistent with LAFCo resource protection policy, only those areas planned for development should be included in the sphere. This would reduce potential effects on agricultural and open space lands, especially in Sphere Expansion Area D.
5. *Potential Annexation Areas* – The sphere of influence does not necessarily indicate a precise time frame for expansion of a city or district. However, the District should generally describe and analyze local conditions and circumstances that may affect future annexations.
6. *Municipal Service Review* – A municipal service review will need to be updated for a sphere amendment. The primary purpose of a service review is to document the District's capacity to provide services to current and future development within its sphere and recommended sphere expansion areas. This information is intended to assist LAFCo in updating the District's sphere and considering potential boundary change proposals affecting the District.

Again, thank you for the opportunity to comment on this project. We appreciate the additional effort that has been invested into the process. Please contact staff at 445-7508 if you have questions regarding this letter.

Sincerely,

George Williamson, AICP
LAFCo Executive Officer