4.0 PUBLIC COMMENTS & RESPONSES

4.1 INTRODUCTION

This chapter provides "Master Responses" to issues that have received numerous comments. Additionally, each letter of comment is included in this section. Responses to individual comments are provided after the Master Responses subsection and are organized by agency, organization, and individual as summarized below in subsection 4.2. Each letter of comment is included; a response to each comment is provided immediately following each letter. Appropriate changes that have been made to the Draft EIR text based on these comments and responses are provided in the CHANGES TO DRAFT EIR (Chapter 3.0) section of this document.

4.2 LIST OF COMMENTS RECEIVED

Letters of comment were received from the following agencies, organizations, and individuals.

RESPONSIBLE AGENCIES

RA-1 Santa Cruz Local Agency Formation Commission (LAFCO)

LOCAL & REGIONAL AGENCIES

LA-1 County of Santa Cruz Board of Supervisors, Neal Coonerty
LA-2 County of Santa Cruz Health Services Agency
LA-3 Monterey Bay Unified Air Pollution Control District

STATE AGENCIES

SA-1 CalFire – California Department of Forestry and Fire Protection
SA-2 Regional Water Quality Control Board
SA-3 State Clearinghouse
SA-4 University of California Santa Cruz, Physical Planning and Construction
SA-5 University of California Santa Cruz, UCSC Natural Reserves

FEDERAL AGENCIES

FA-1 U.S. Department of the Army – U.S. Army Corps of Engineers
FA-2 U.S. Department of Commerce – National Marine Fisheries
FA-3 U.S. Department of the Interior – Fish and Wildlife Serve

ORGANIZATIONS & AFFILIATIONS

O-A-1 Community Water Coalition, Gary A. Patton, Wittwer & Parkin, LLP
O-A-2 Environment in the Public Interest (EPI), Gordon Hensley
O-A-3 Environment in the Public Interest, Alexander T. Henson Esq.
O-A-4 Habitat and Watershed Caretakers, Stephan C. Volker
O-A-5 Rural Bonny Doon Association
O-A-6 Santa Cruz Bird Club
O-A-7 Sierra Club
O-A-8 University of California Faculty, Karen Holl, Don Croll, Laurel Fox, Gregory Gilbert, Deborah Letourneau, Michael Lok, Ingrid Parker, Daniel Press, Zdravka Tazankova, Chris Wilmers, Eria Zavaleta

INDIVIDUALS

I-1 Elizabeth Andrews
I-2 Frank Andrews
I-3 Jeff Arnett
I-4 Robin Bliss-Wagner
I-5 Vince Cheap
I-6 Joe Christy
I-7 Madeleine Clyde
I-8 Tara Cornelisse
I-9 Greg Cotton
I-10 Renwick Curry
I-11 Jodi Fredani
I-12 James Gill
I-13 Grey Hayes
I-14 Hal Levin
I-15 Michael Levy
I-16 Carol Long
I-17 Rick Longinotti
I-18 Bill Malone
I-19 Fred McPherson
I-20 Dustin Mulvaney
I-21 Nell Newman
I-22 Ron Pomerantz
I-23 James Proffitt
I-24 Orly Rabinowiz
I-25 Reed Searle

I-26 Don Stevens, January 7, 2010

I-27 Don Stevens, January 15, 2010

COMMENTS ON WATER SUPPLY ASSESSMENT RECEIVED BEFORE PUBLIC DISTRIBUTION OF THE DEIR, AND INCLUDED AS APPENDIX F IN THE DEIR

WSA-1 Andy Schiffrin

WSA-2 Community Water Coalition, Gary A. Patton, Wittwer & Parkin, LLP, October 13, 2009

WSA-3 Don Stevens, October 13, 2009

WSA-4 Sierra Club

WSA-5 Reed Searle

WSA-6 Bill Malone

WSA-7 Don Stevens, October 22, 2009

WSA-8 Rick Longinotti

WSA-9 Community Water Coalition, Gary A. Patton, Wittwer & Parkin, LLP, October 26, 2009

4.3 MASTER RESPONSES

Master responses have been prepared to address common issues that have been raised by several comments. Master responses are organized by topic. Each Master Response identifies the coded comments that raise the particular issue to which the Master Response is addressed (with letter and comment numbers). Based on the comments received, the following Master Responses are provided:

- **Project Description**
  - PD-1 – Project Overview, Purpose & Objectives
- **Water Supply**:
  - WS-1 – Water Supply Adequacy & Potential Reductions
  - WS-2 – Project Water Demand
  - WS-3 – Desalination Project Purpose & Impacts
  - WS-4 – UCSC Campus Water Sources
- **Growth Inducement & Secondary Effects of UCSC Development:**
  - GI-1 – Request for HCP/NCCP for UCSC
  - GI-2 – Forest Resources
  - GI-3 – Cave Gulch Erosion
- **CEQA Considerations:**
  - CC-1 – Significant Unavoidable Impacts
  - CC-2 – EIR Recirculation

❑ PROJECT DESCRIPTION MASTER RESPONSES

MASTER RESPONSE PD-1 – Project Overview, Purpose & Objectives

[LA-1-1, 2, 3, 4, 9, 19, 21, 30; SA-4a-1; OA-1-17; OA-3-1 & 4; WSA-1-4]

A number of comments questioned the EIR's description and characterization of the project and its purpose and objectives. Some comments indicate that the project would be more accurately described as the applications to LAFCO to amend the City's Sphere of Influence (City application) and to provide extraterritorial services to UCSC (UCSC application). However, applications alone do not constitute a "project." CEQA defines a "project" as "the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is (among other things) . . . [a]n activity directly undertaken by any public agency." (CEQA Guidelines § 15378(a)(1).) Guidelines section 15378(c) further states that "[t]he term 'project' refers to the activity which is being approved and which may be subject to several discretionary approvals by government agencies. The term 'project' does not mean each separate governmental approval." Thus, to the extent that the comments assert a narrower definition of the "project" that they believe should be analyzed in this EIR in place of the broad, inclusive interpretation the City has applied here, such interpretations would not be consistent with CEQA.

As stated on page 3-2 of the DEIR (and elsewhere in the DEIR), the proposed applications are for the purpose of amending the City's Sphere of Influence to include a portion of the North Campus area of UCSC for the purpose of providing extraterritorial water and sewer service to this area pursuant to the steps outlined in the Comprehensive Settlement Agreement. The applications, like a use permit or coastal development permit application, are for an action to be carried out, which in this case is changing the City's Sphere of Influence boundaries to provide extraterritorial water and sewer service to the North Campus area. The EIR covers both applications and more importantly, the direct and reasonably foreseeable indirect physical activities that could result from LAFCO's approval of the applications. Implementation of the project would adjust the City's Sphere of Influence (and, thus, its probable physical boundaries) and would allow the City to provide extraterritorial water and sewer service to a portion of the UCSC North Campus in which UCSC proposed development in its adopted 2005 Long Range Development Plan (LRDP) and as set forth in the Comprehensive Settlement Agreement. Specifically, UCSC's 2005 LRDP designates the proposed SOI project area for a mix of college, housing, physical education, academic facilities, campus reserve and protected landscape/resource land uses.

The proposed project does not include or indicate specific locations of physical extensions of water or sewer lines or site-specific development on the UCSC campus. As indicated on page 3-9 of the DEIR (and throughout the DEIR document), there are no current University-proposed plans for infrastructure extension or site-specific development. The 2005 LRDP

adopted by The Regents of the University of California plans for future development in the North Campus area. As discussed in section 5.0 of the DEIR, the proposed project would indirectly support the planned UCSC growth as envisioned in its adopted 2005 LRDP and further conditioned in the Comprehensive Settlement Agreement. The environmental effects of future development under the 2005 LRDP were previously analyzed at a programmatic level in the University-prepared EIR for the 2005 LRDP. This area is in the exclusive control of the University of California. However, no specific development projects have been announced by the University as of the time of preparation of this EIR. The project description for this EIR, therefore, does not include any specific new development projects on the UCSC campus.

Section 2.8 of the Settlement Agreement indicates that UCSC will apply to LAFCO for extraterritorial water and sewer services, and section 2.8.b indicates that the City will propose a Sphere of Influence amendment concurrent with UCSC's LAFCO application, and the Settlement Agreement goes on to say that UCSC shall initiate its LAFCO application concurrently with the City's Sphere of Influence application. Thus, the two applications are intended to be filed and considered concurrently. While it can be said that the City, as the lead agency, has prepared this EIR in connection with the application the University has submitted to LAFCO for extraterritorial sewer and water service from the City to an area in the UCSC North Campus planning area outside City limits, as well as a concurrent application filed by the City with LAFCO to amend the City's sphere of influence so as to facilitate the University's LAFCO application (from DEIR page 4.3-16), the project includes the activities that would be implemented as a result of the application. It does not matter for CEQA purposes in which order these two applications are considered or described; rather, as explained above, CEQA simply mandates that they be considered and analyzed "as a whole", with an emphasis on determining the reasonably foreseeable direct and indirect physical environmental impacts that could result from activities carried out in furtherance of the LAFCO approvals that are sought.

Therefore, the "project" evaluated in this EIR includes the concurrent City and UCSC applications to LAFCO for the purpose of changing the City's Sphere of Influence boundary to provide extraterritorial water and sewer service to a portion of the UCSC campus. In filing its application to LAFCO for a Sphere of Influence amendment, the City is implementing its obligations set forth in the Comprehensive Settlement Agreement, which remains as an objective of the project. Similarly, UCSC is implementing its Settlement Agreement commitments in filing a complementary application to LAFCO. The Settlement Agreement was entered as a final stipulated judgment of the Santa Cruz Superior Court, thereby superseding the previous court ruling regarding legal challenges to the University's 2005 LRDP EIR. Pursuant to this stipulated judgment, the City agreed to continue to provide water service to the UCSC campus through its existing water connections (that it may use to support development in its 2005 LRDP) to assist UCSC with achieving its on-campus housing commitment set forth in the Settlement Agreement, consistent with other provisions of the Settlement Agreement.

The DEIR text has been clarified (see the CHANGES TO DRAFT EIR [Chapter 3.0] section of this document) to state that the project objectives are:

- Implementation of both the City of Santa Cruz and UCSC commitments set forth in the Comprehensive Settlement Agreement as related to submittal of concurrent applications to LAFCO to facilitate the provision of water and sewer services to the UCSC North Campus area;
- Amendment of the City's Sphere of Influence boundaries to include ~~this~~ portions of the North Campus area of UCSC; and
- City provision of extraterritorial water and sewer services to portions of the North Campus.

To a large extent, the comments disputing the characterization of the project's purpose, need and objectives disagree with certain broad summary characterizations of the project as a whole, while agreeing with the EIR's depiction of specific applications and activities that make up the "project." The commenters' concerns about the summary characterizations are noted, but the City does not agree with any implication that the whole of the project is inaccurately described by occasional resort to summary, but still accurate, characterizations of the actions and commitments of the respective parties to the Comprehensive Settlement Agreement.

❑ WATER SUPPLY MASTER RESPONSES

MASTER RESPONSE W-1: Water Supply Reliability & Potential Reductions

[LA-2-2, FA-3-9, OA-1-8, OA-1-10, OA-1-12, OA 4-1, OA 7-3, I-10-1, I-17-2 & 3, I-18-2 & 4, I-22-3, WSA-2-8, WSA-4-4, WSA-6-3, 5 & 7, WSA-7-1]

OVERVIEW

The comments indicate that there are "unresolved planning issues" identified in the City's 2005 Urban Water Management Plan (UWMP) that threaten the City's current water supplies, such as preparation of and negotiations over a Habitat Conservation Plan; water rights conformance issues; the potential for seawater intrusion in the City's Live Oak Wells; and effects of climate change. Commenters assert that until all of these outstanding issues are resolved, the City should not be making judgments about how much water it will have available in the future. These planning issues are identified in the UWMP, as well as the Water Supply Assessment (WSA) and the Draft EIR prepared for the proposed project. It is possible that all of the foregoing issues have some potential to affect the City's water supply at some time in the future. However, many of these issues have been ongoing and unresolved for a considerable length of time, with the water rights matters the subject of discussions with the State Water Resources Control Board going back as far back as 1995 and the Habitat Conservation Plan discussions underway since more than six years ago. The uncertainty of

timing or resolution, quantification of effects on water supplies, and even the speculative nature of any resulting changes to the water supply make it infeasible and unreasonable to wait for definitive resolution of all of these issues in the face of the State Water Code provision that stipulates a Water Supply Assessment (WSA) must be completed within 90 days of the request from the land use agency. (Water Code § 10910[g].) Specific issues that have been raised which may affect the City's water supply are further discussed below.

REVIEW OF SPECIFIC PLANNING ISSUES

- **EFEECTS OF HCP ON SUPPLY**
  [LA-2-3, FA-2-6, FA-3-9, OA-1-8 & 10, OA-3-7, OA-5-3, OA-7-3, I-17-2, I-18-2 & 4, WSA-2-8, WSA-3-1, WSA-4-4, WSA-6-5]

  The comments assert that the City is engaged in a Habitat Conservation Planning (HCP) process and that the final outcome of that process will almost surely result in a loss of water supply that is now available due to requirements to protect endangered fish species and their habitat. The City entered into the HCP process in 2004 for the purpose of obtaining a Section 10 "incidental take" authorization for its water operations and providing the City certainty in regard to available water supplies in the future. The scope of the HCP was multi-species, both aquatic and terrestrial, for all of the activities of the City Water Department.

  Over the past 6 years, the City has coordinated and met with U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS), but at this time there has been no tentative, let alone final, agreement on the strategies by which all of the life stages of all of the threatened or endangered species present in areas of the City's water supply operations will be protected. The process is necessarily complicated and thoughtful, requiring many fish surveys and other field work. As of February 23, 2010, a change order to the scope of work for the City's fisheries biologist was approved in order to conduct additional studies in the San Lorenzo River as requested by the agencies.

  As there are various life stages at different times of the year, e.g. in-migration, out-migration, spawning, rearing, the strategy for species and habitat protection will vary. Moreover, there are many structural-type remedies that are beneficial that do not involve release of water, e.g. in-stream placement of woody structures and lagoon management. A draft HCP has not yet been prepared, and tentative agreements on operations have not been reached. Nor has the City received any written communication from the resource agencies regarding the amount of any potential reductions in the City's water supplies due to implementation of the HCP. However, the City has interim Stream Alteration Agreements with DFG that have resulted in voluntary fish releases from Liddell Spring, Majors Creek, and Laguna Creek. The City continues to conduct in-

stream analyses of flow regimes as they relate to the life stages of the threatened and endangered species in all of those water bodies.

Based on the above, it is not known how much longer it will take to finalize not just the HCP process but also the process by which the City receives a Section 10 Permit. It is also very uncertain how much water will be needed for habitat conservation, not only in quantity, but seasonally, which is important as it relates to water supply availability. With regards to timing, the City's studies have been expanded from North Coast streams to include new surveys in the San Lorenzo River due to its importance in coho salmon recovery efforts. Although, some comments assert that long-term requirements for in-stream flow releases will reduce the City's available supply, the extent to which these assertions will prove correct is not yet known. It is acknowledged that the U.S. National Marine Fisheries Service (NMFS) has indicated that it is expected that the City will lose water as a result of this action, but the agency also indicates that long-term requirements for in-stream flow releases affecting the City's surface water diversions have yet to be determined (see Comment FA-3-9). Therefore, any estimate of how much of reduction could result would be purely speculative at this point in time. Additionally, as indicated above, it is also unclear how much the City will be able to achieve in habitat conservation through structural means that do not require water releases, and thus, any effect on water supply availability.

Because of the multiple uncertainties explained above, the City determined it could not make any reasonable assumptions about how, if at all, the eventual result of the HCP process will affect the quantity of water supplies the City can make available in the future. CEQA does not require agencies to engage in speculation or to suspend all decision-making until processes like the HCP conclude. Rather, the City may proceed, as it has done in this EIR, to make reasonable assumptions based on the data and information that is available at the time the EIR is prepared.

- **WATER RIGHTS**
  [FA-3-9, OA-1-8, OA-1-11, OA-3-7, OA-4-8, 10 & 11, OA-7-3, I-17-2, I-18-2 & 4, I-22-3, WSA-3-2, WSA-4-5]

The comments assert that the City is engaged in amending its water rights on Newell Creek and the San Lorenzo River in Felton, and therefore should not have been considered in reporting future City water supplies given the uncertainty about the water rights process and protests filed. The City filed an application in 2006 to the State Water Resources Control Board (SWRCB) to amend its water rights on Newell Creek and Felton Diversion to add a right of direct diversion and to petition for an extension of time to go to full appropriation on Felton Diversion as discussed on page 4.1-2 of the DEIR. As noted in the comments, three different parties filed protests to those applications: The California Department of Fish and Game (DFG); National Marine Fisheries Service (NMFS); the Marine Corp Base, Camp Pendelton (CPEN).

The CPEN protest raised the legal issue of whether a water right holder or applicant may petition to the State Water Board to change an application, permit or license to allow for direct diversion when the current application, permit or license is for diversion to storage. The City appealed to the SWRCB that the public interest and the law support the use of the change petition process to add direct diversion to its San Lorenzo River and Newell Creek Water Rights. In December 2009, the SWRCB affirmed the legitimacy of the application for a change, finding that it has the authority to approve such a change, and denied the CPEN Petition for Reconsideration. A copy of the Board's action (Order WR 2009-0061) is included in Appendix B. On the basis of these developments, the City concluded that it had substantial evidence to support its assumptions about the amounts and likelihood of continued water rights the City holds and may continue to rely upon in the future.

The CDFG protest filed against City petitions was based on concerns regarding direct and cumulative impacts on endangered species (coho salmon, steelhead, California red-legged frog). The protest (which is attached to Comment Letters OA-1 and OA-4) asserts that existing bypass flows at Loch Lomond and Felton Diversion Dam are lower than the flows needed for fisheries. The protest identifies 10 draft terms for CDFG to dismiss its protest. The City is in the process of working with both DFG and NMFS on these terms and developing mutually acceptable terms and conditions under which the City will be granted a Master Streambed Alteration Agreement and a Section 10 Permit. When both parties agree on the terms of dismissal, CDFG will write a letter to the SWRCB informing them they are withdrawing their protest, and the terms and conditions of that withdrawal. No conclusions have been reached as of this time, and the City is currently the only agency actually conducting in-stream analyses to address some of the fisheries' issues.

Regarding the petition for the time extension to go to the full appropriation on the Felton Diversion, the City believes it is premature to conclude that it is unlikely to retain (not regain as suggested in one comment) this water right. The City has been granted two other such extensions of time – in the mid-1980s and again in the mid-1990s after negotiations with CDFG and execution of a MOA that modified the manner in which the City operated the facility. The City also is working with DFG and NOAA Fisheries to consider how the facility could possibly be used to aid the Coho Recovery Plan enhancement strategies. Thus, it would be premature and speculative to conclude that the City is unlikely to retain this water right.

Some comments also asserted that additional in-stream diversions will preclude the recovery of coho salmon. The City does not propose additional in-stream diversions, either as part of the proposed project or as part of its overall water system operation. No new diversions are associated with the applications pending before the SWRCB. See the "Water Adequacy for Fisheries" subsection below for further discussion.

- **LIVE OAK WELLS – GROUNDWATER OVERDRAFT / SEAWATER INTRUSION**
  [FA 3-5 & 9, OA 1-8, OA 4-4, OA-7-3, I-17-2, I-22-3, WSA-2-8, WSA-3-1]

  The comments indicate that the DEIR and WSA should have analyzed the impacts that would occur if the City lost some of its water supply capacity as a result of the ongoing issues discussed above, and had to pump its groundwater sources more to make up for it. All of the City's water planning documents, e.g., Urban Water Management Plan and the Integrated Water Plan, are very clear about the limited amount of groundwater that is available from the Purisima aquifer in the Live Oak Area. Those planning documents state that the groundwater available to the City is 1 million gallons per day (mgd) during the high use season in all years and during drought conditions, it could be pumped at 2 mgd for the 210-day high use period. The City has done exhaustive exploration in the past for any other sources of groundwater that may be available to it and has concluded that there are none as summarized on page 4.1-21 of the DEIR (Carollo Engineers studies in 2000). Therefore, there is no need to analyze the impact of further groundwater pumping as increased groundwater pumping will not be implemented regardless of what can be taken from other sources.

  Some comments also question the reliability of groundwater supplies due to groundwater overdraft and seawater intrusion issues. As indicated in the DEIR (pages 4.1-5 to 4.1-6), groundwater levels have been lowered across the Purisima Formation (from which the City draws its groundwater), but there appears to be no imminent threat of seawater intrusion in the basin from which the City draws groundwater. As described in the WSA (Appendix B of the DEIR), the City overlies a basin that is referenced by the California Department of Water Resources (DWR) as the "Western Santa Cruz Terrace Groundwater Basin" (DWR Basin No. 3-26), and is the only public groundwater producer in this basin, although the Purisima Formation that underlies this basin also underlies three other DWR-defined groundwater basins and provides drinking water for two adjacent water districts (Soquel Creek Water District and Central Water District), as well as multiple private landowners. The West Santa Cruz Terrace Groundwater Basin, has not been designated as overdrafted by the DWR. The DEIR (and the City's UWMP) acknowledge the potential for longer-term overpumping and seawater intrusion, although at this time such conditions do not exist in the basin. It would be speculative to try to estimate when such a condition may occur and the effect on groundwater supplies. The City maintains a network of monitoring wells to measure groundwater levels and quality to aid in its overall operations decisions. See the WSA in Appendix B of the DIER (pages 32-35) for further discussion of groundwater issues.

- **SLVWD ALLOCATION FROM LOCH LOMOND**
  [LA-2-4, OA-1-8, I-22-5, WSA-2-10, WSA-4-4]

  The comments assert that the EIR (and WSA) failed to discuss/analyze the right that the San Lorenzo Valley Water District (SLVWD) has to a certain amount of water in the Loch Lomond Reservoir, thereby ignoring the possibility that the City's water supply could be reduced if SLVWD exercises its right. The SLVWD prepared a "Water Supply Master Plan" in May 2009. According to this plan, SLVWD is entitled to 102 MGY of Newell Creek stream flow stored in Loch Lomond or an equivalent amount of treated water purchased from the City. In concept, the City anticipates the delivery of treated water would be interruptible during declared water shortage emergencies. SLVWD's maximum seasonal need from a supplemental source such as Loch Lomond could range up to 80 AF per month (approximately 26 MG). The Master Plan indicates that SLVWD will need to begin exercising its Loch Lomond entitlement, but the feasibility of treating, conveying and integrating this source into SLVWD's existing system has not been evaluated (Nicholas M. Johnson, May 2009).

  The UWMP does indicate that of the total 1,042 MGY that the City may withdraw from Loch Lomond Reservoir, 10% is "technically available" to the SLVWD and was referenced in relation to historical operations. However, the water system model on which the City's planning is based, and therefore, in all of the planning documents that form the basis for water supply planning, deducts 102 MGY and it is not assumed available for City use. The City's water system model upon which all the City's water planning is premised, always deducts three amounts of water from the Newell Creek Reservoir when calculating how much water is potentially available to the City in any year: 1) fish releases; 2) evaporation, and; 3) the reservation for SLVWD (102 million gallons/year). No long-term estimate of water available to the City from the Newell Creek Reservoir ever counts any of those three amounts. Therefore, the assertion by the commenters that the City improperly assumed it had too much future water in the Loch Lomond Reservoir available to it is mistaken. The City has reopened discussions with SLVWD about its entitlement to this water, and the City has expected that SLVWD intends to exercise its right to that supply (Kocher, personal communication, March 2010).

- **EFFECTS OF CEMEX QUARY EXPANSION ON NORTH COAST SUPPLIES**
  [OA-1-9, I-22-8, WSA-2-8]

  Two commenters stated that a proposed expansion of the Bonny Doon Quarry in unincorporated Santa Cruz County could adversely affect North Coast water supplies, and that this should be addressed in the EIR. An application to extend the approved quarry limits and mining duration had been under project and environmental review since the late 1990s. An EIR was prepared and circulated for public review. The City commented on potential impacts to its Liddell Spring water supply source that could

result from the proposed expanded quarry operations. An EIR has not been finalized or certified nor has any further action been taken by the County on the application. In 2009 the quarry applicant, Cemex, announced closure of its Davenport operation. The application has not been formally withdrawn, but County staff have indicated that the applicants have informed County staff numerous times that they will not move forward with the mining permit extension, but they plan to proceed with implementation of a restoration plan that was approved with their current permit in 1998 (Dave Carlson, Santa Cruz County Planning Department, personal communication to Mike Ferry, City of Santa Cruz Planning & Community Development Department, March 2010). Thus, the potential impacts to North Coast water supplies posed by this application are no longer applicable.

- **EFFECTS OF CLIMATE CHANGE**
  [LA-2-5, OA-1-8, OA-5-5, OA-7-3, I-10-1, I-18-2, I-21-10, WSA-2-8, WSA-4-5, WSA-6-5]

  The DEIR addresses potential effects of climate change on pages 4.1-12 and 4.1-13 in the DEIR. As indicated herein, changes in precipitation/runoff and a sea level rise could affect coastal water resources. Some commenters asserted that changes in precipitation patterns from climate change may reduce groundwater recharge and resulting summer stream flows. According to the California Department of Water Resources report (July 2006) cited in the DEIR (page 4.1-13), trends in precipitation change are hard to determine, but worldwide precipitation is reported to have increased about 2% since 1990. Precipitation and stream flow records indicate an increase in precipitation, and increased precipitation could benefit water supplies and improve environmental conditions in some areas, especially where water supply diversions have significantly affected stream flow (California Department of Water Resources, July 2006).

  Global climate models vary considerably in projecting precipitation patterns, and climate change could potentially alter California's historical precipitation patterns. Simulations conducted by the State of California predict drier conditions in the future, although at the same time there is continued risk from intense rainfall events that can generate more frequent and/or more extensive runoff (California Natural Resources Agency, "2009 California Climate Adaptation Strategy"). While many of the state reports have focused on changes on Sierra snow pack and other major California water sources, recent reports indicate that warming temperatures, combined with changes in rainfall and runoff patterns will exacerbate the frequency and intensity of droughts. Although average annual precipitation may not change, more intense wet and dry periods are anticipated (California Department of Water Resources, October 2009). Regions that rely heavily upon surface water (rivers, streams, and lakes) could be particularly affected as runoff becomes more variable (California Department of Water Resources, October 2008).

  The City has acknowledged that climate change may well impact City water supplies that are largely dependent on surface water flows. As indicated in the DEIR, rainfall

events may likely be heavier and less frequent, thus potentially affecting storage capacity in the Newell Creek Reservoir, as well as stream flows. To the extent that rain events are more intense but less frequent, the base flow in streams and rivers from which the City diverts could change. Predictions regarding the extent of climate change on water resources are dependent on many variables. Models are being developed to assist water utilities in looking at climate change variables in their water planning efforts,[1] but the timing and quantification of potential climate changes effects are too speculative to try to predict with any certainty at this time. However, the City is working with other County water agencies to evaluate the models that are being developed and will use the information during the next update of the City's Urban Water Management Plan.

- **WATER ADEQUACY FOR FISHERIES**
  [FA-2-3, FA-2-5, FA-2-6, FA-3-9, OA-4-3]

  As indicated in the comments from the National Marine Fisheries Service (NMFS), some of the surface water sources currently used by the City also maintain populations of the Central California Coast (CCC) Distinct Population Segment (DPS) steelhead and CCC Evolutionary Significant Unit (ESU) coho salmon. Several comments assert that existing City water supplies are not adequate to support coho salmon or steelhead. The City utilizes surface sources pursuant to established permits and water rights limits. As discussed in the DEIR and several Master Response subsections above, the City is undertaking additional studies on endangered species, including fish, as they relate to its water sources and operations. However, conclusions have not been reached as of this time regarding any minimum required flows for different fish life cycles. It is also noted that while certain comments have been made regarding adequacy of flows for fisheries, to date, the City is the only agency actually conducting in-stream analyses to address these fisheries' issues. It is acknowledged that the National Marine Fisheries Services (NMFS) has indicated that it does not believe the City has sufficient water under current operations.

  The comments also assert that additional in-stream diversions will preclude the recovery of coho salmon. The City does not propose additional in-stream diversions, either as part of the proposed project or as part of its overall water system operation. The comments may misunderstand the petition to change the City's Loch Lomond diversion from storage to direct diversion as requesting additional diversions, which is not the case. The petition, if granted, would only change the purpose of the diversion, not the volume or place, as noted on page 4.1-12 of the DEIR.

[1] See Water Utility Climate Alliance. January 2010. "Decision Support Planning Methods: Incorporating Climate Change Uncertainties into Water Planning."

CONCLUSION

Some comments have asked for quantification of the potential reductions in supply that could occur as a result of the issues addressed above. However, as discussed above, there is currently no substantial evidence supporting a quantification of whether or to what extent supplies may be changed as result of the outcome of the HCP process, the SWRCB applications processes or climate change. As further explained above, there also would be no change in groundwater pumping. Similarly, the City's water system model does not include the SLVWD's entitlement to Loch Lomond supplies; rather, it has consistently excluded that supply from the assumptions about the amounts of water actually available to the City. Some comments suggest arbitrary percentage reductions, but again, but these would be speculative.

As indicated on page 4.1-1 of the DEIR, the City is required by state law to prepare an Urban Water Management Plan and update it every five years. This process allows and requires the City to review and update demand, supply production and availability, and to make future forecasts. The City will be updating its current UWMP later in 2010 with adoption anticipated in 2011. Any new information or decisions involving the issues discussed above that are available at that time will be incorporated into this update.

Suggestions to delay the project or completion of the EIR until the HCP process is completed and the water rights applications are resolved would not be reasonable or justifiable given the speculative nature of the timing and final outcomes of those processes. The proposed project does not "commit" water to the University as has been suggested. Rather, the project would provide water services to a geographical area within an amended Sphere of Influence for potential future development. Future University development would be constrained and curtailed as any other user served by the City Water Department in the event City imposes water use restrictions, curtailment, or possible water connection moratoriums. The Comprehensive Settlement Agreement (Section 3.2[a]) provides that if the City declares its water supplies are sufficiently short no further connections will be allowed (connection moratorium), and the University must abide by that moratorium and may not increase its water demands until the supply is increased. Thus, the Comprehensive Settlement Agreement already provides the necessary flexibility to react as necessary to any future obligations or restrictions imposed upon the City through the HCP or water rights processes. However, due to the speculative nature of those future obligations, if any, the City is not required to analyze what are currently only hypothetical outcomes. The City is "not required to engage in speculation in order to analyze a 'worst case scenario.'" (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 373.)

The DEIR text has been expanded (on pages 4.1-11 to 4.1-3) to provide additional discuss of the issues as discussed above; see the "Water Supply" subsection in the CHANGES TO DRAFT EIR (Chapter 3.0) section of this document.

MASTER RESPONSE W-2: Project Water Demand

[RA-1-7, OA 5-6, WSA-1-7, WSA-2-1, WSA-2-7]

Comments assert that there is a 52 million gallon difference in reporting the University's new water demand between the University's application to LAFCO and the demand cited in the EIR analysis. The demand number (152 MGY) included in the UCSC application to LAFCO for provision of extraterritorial services was based on a total 2005 LRDP water demand of 341 MGY projected in the year 2020 (including the off-campus Delaware facilities) less the existing demand in 2005 of 189 MGY for a total net increase of 152 MGY. This estimate was based on a technical study prepared for the University (ARUP, August 2006) in which new on-campus development was projected to result in an increased water demand of approximately 122 MGY. (This is summarized in the Water Supply Assessment (WSA) that is included as Appendix B of the Sphere of Influence DEIR.)

The Sphere of Influence DEIR updated the water demand projections based on changes that had occurred since the 2005 LRDP FEIR was prepared. The WSA and DEIR analyses both started with the future demand of 122 MGY for new campus development that was estimated for the University (ARUP, August 2006). The Sphere of Influence Amendment DEIR analysis added the demand for Summer Session as identified in the LRDP 2005 EIR (10 MGY). The total water demand was modified based on the provisions of the Comprehensive Settlement Agreement, which require construction of additional on-campus housing units (and thus a water increase of 14 MGY) and implementation of water conservation measures that would result in a water decrease of 30 MGY. Additionally, some campus projects are currently under construction, approved, or proposed within the building area/water demand identified for the adopted 2005 LRDP but are located on the lower campus south of the project area. The water demands for these projects (16 MGY) were deleted from the total new campus demand as this demand would not occur within the project area. These factors are summarized on Table 1 of the WSA and Table 2-4 of the SOI DEIR, which results in an estimated net increase of 100 MGY for the proposed project (SOI area).

It is likely that additional development and water demand would also occur on the lower campus, but the LRDP does not predict how much, and the Settlement Agreement indicates that the application of provision of extraterritorial services is for development of 3,175,000 gross square feet of additional buildings per the 2005 LRDP. Thus, the project water demand estimates developed in the WSA and DEIR represent reasonable worst-case estimates for the purpose of CEQA.

It should also be noted that existing and future demands analyzed in the DEIR are based on conditions in 2007, as it was the last full year of City and UCSC data at the time the Sphere of Influence EIR's Notice of Preparation was prepared and circulated in accordance with State CEQA Guidelines section 15125(a). UCSC has indicated that the SOI DEIR accurately reflects the project water demand associated with the project, and it will correct or file an amendment

to its LAFCO application to reflect that water demand is estimated to be 100 MGY (see Comment SA-4b-6).

MASTER RESPONSE W-3: Desalination Project Purpose & Impacts

[LA-1-12, I-9-1, I-15-1 & 2, I-17-5, I-18-6, I-22-12, I-23-1, I-25-5, WSA-1-2, WSA-4-6 & 11, WSA-5-2, WSA-6-6]

A number of comments ask for clarification of the purpose of the desalination project, suggest it is needed for UCSC growth, and/or question the timing and impacts of a facility. A desalination project has been considered by the City over the past 10 years in addition to other supplemental water sources (see DEIR, pages 4.1-20 to 4.1-23). The DEIR summarizes the City's water management strategy set forth in the City's adopted *Integrated Water Management Plan* (IWP) (see pages 4.1-14 and 4.1-15 of the DEIR). As indicated herein, the City's long-term water resource strategy as laid out in the IWP includes three components: water conservation, water use curtailment (up to 15% during drought years) and desalination. As discussed on pages 4.1-14 & 15 of the DEIR, the IWP was prepared to "help the City 1) reduce near-term drought year shortages and 2) provide a reliable supply to meet long-term needs while ensuring protection of public health and safety." The IWP concluded that "Strategies D-1 and D-2 (City-Only and Regional Desalination, respectively) at the curtailment level of 15% were the preferred alternatives." The IWP indicated that the final choice between the City-only and regional-only strategies would be made upon completion of the EIR on the IWP. In November 2005, the City Council adopted the recommended strategy that includes conservation, 15% curtailment during drought years, and an additional water supply consisting of a 2.5 mgd desalination facility that would be expandable in 1.0 mgd increments up to 4.5 mgd, if needed in future years. The City's decision also included the possibility that the Soquel Creek Water District would be a part of the desalination project.

As discussed in the IWP and UWMP and summarized in the Sphere of Influence DEIR (pages 4.1-7_to 4.1-8), the City currently experiences a water shortage during multiple dry years (and has experienced this shortage since the preparation of the IWP began in the late 1990s). The primary water management challenge presently facing the City of Santa Cruz is the lack of adequate water supply during extended drought periods. As reported in the DEIR (page 4.1-7), the IWP found that during an extreme two-year drought similar to that which occurred in 1976-1977, a 46% shortage would be experienced. Thus, the adopted IWP strategy of conservation, curtailment and desalination is required for existing multiple dry-year conditions even without any further development within the Water Department's service area.

The first phase of a desalination facility was always intended for drought protection for the City, whereas subsequent expansion phases might be necessary to provide a long-term supplemental supply. The IWP forecasts water demand to the year 2030, and indicates that at the end of the planning period, in addition to very large worst-year shortages, the City will

have difficulty meeting average year demands (Gary Fiske and Associates, June 2003, pages ES-4 and 2-13).

The IWP Draft EIR (EDAW, October 2005) also indicates that the facility may be needed for a long-term supplemental supply (Table 4-6 as clarified in the Final EIR and Final EIR Master Responses 1 and 2). The IWP Final EIR Master Response 2 (MR2) further clarified the desalination plant purpose by stating that "the provision of additional water supply through desalination as proposed in the IWP would occur in three staged increments, with the first increment supplying water for drought protection and to meet the currently approved and planned growth and the subsequent increments intended for drought protection and future growth (DEIR, p. 1-2, and Tables 1-1a and 1-1b)." The response further states that:

> "This approach was intentionally taken to enable the City and the public, the flexibility and opportunity, in the future, to assess growth and the need (if any) for additional water supply. The phases are tied to the population projection horizons identified in the City of Santa Cruz General Plan and Local Coastal Program and the *Water Demand Investigation* (Maddaus, 1998). The near-term phase is defined as 2005 to match the current General Plan's horizon, which would not be achieved until 2009. The long-term phase is the period from 2005 through 2030 to synchronize with the planning horizon that would be identified in the updated General Plan, with the knowledge and understanding that the timing of, or need for, future phases is dependent on growth that is prescribed by adopted future General Plans for the Cities of Santa Cruz and Capitola and the County of Santa Cruz, and any increase in water demand that may accompany that planned growth. The need for consideration of expansion of the desalination plant to its future increments would be confirmed upon update of the population projections in the applicable future General Plans and timed for decision when actual water demands warrant that consideration. In this manner, the provision of water supply beyond the immediately needed first increment would not go beyond the City's needs, remove any barriers to growth, or cause growth inducement."

Based on water demand projections developed for the IWP, the City had anticipated that water demand under future normal year conditions would exceed water system capacity at some time between the years 2015 and 2020. The Urban Water Management Plan (UWMP) indicates that the desalination plant capacity of 2.5 mgd would be for drought protection for "the current population" (page 5-9). The UWMP goes on to clarify that two subsequent 1.0 mgd increment expansions are "also intended for drought protection but would be triggered by the amount of growth in demand over time," and that "it may become necessary to operate the desalination facility…on a year-in, year-out basis to supplement existing supplies."

Thus, the desalination project has been consistently referenced as being needed initially for drought protection, as well, as for a potentially longer-term, year-round supplemental water

source. Since the City's adoption of the IWP and UWMP, the Soquel Creek Water District (SqCWD) has joined with the City of Santa Cruz as a partner in the desalination project due to groundwater concerns in the District. The SqCWD is entirely dependent on local groundwater, and does not take water from surface water or regional water supplies. The Aromas Red Sands (Aromas) aquifer and the Purisima Formation represent the two primary groundwater resources in the Soquel-Aptos Groundwater Basin where the SqCWD wells pump groundwater. Beginning in the late 1990s, SqCWD began evaluating depressed groundwater levels and saltwater intrusion, long-term water demand, conservation opportunities, the adequacy of water supplies and the preferred options for supplemental water supplies. The current annual water use for the SqCWD exceeds the available water supply even during non-drought conditions. The current situation is not sustainable, and groundwater monitoring indicates saltwater intrusion may be affecting the Aromas aquifer along the southern coast and the Purisima Formation aquifers.[2] To manage the basin within its safe sustainable yield, the SqCWD needs additional water supplies to supplement groundwater pumping to meet customers' needs and raise groundwater levels to prevent saltwater intrusion.

Therefore, the purpose of the proposed desalination project is drought protection and secondarily for future growth for the City of Santa Cruz and as a supplemental water source for the Soquel Creek Water District for groundwater protection. The current purpose as stated on the desalination project's website (**"**scwd² Seawater Reverse Osmosis Cooperative Desalination Program" Web site[3]) is "to provide needed water supply during droughts, protect groundwater aquifers, and improve water supply reliability for Santa Cruz and Soquel Creek Water District water users."

The proposed sphere of influence amendment and provision of water service to the North Campus of UCSC would not affect the City's (and SqCWD's) past decisions regarding the proposed desalination facility, nor would the project result in increased pressure to build the facility as it is already proposed. The City and SqCWD are moving forward with the design and environmental review phases as discussed on page 4.1-35 of the DEIR. Construction of the desalination plant is not needed for the proposed project (SOI amendment and provision of extraterritorial service) nor is desalination a component of the proposed project. The desalination project is considered necessary under current drought conditions. The DEIR does evaluate the effects of the proposed project on water supply during drought conditions, and concludes that a greater level of curtailment in dry or multiple-dry years may be necessary with the project. (See Response to Comment LA-1-17.) It should also be noted that UCSC water demand and growth has been included in the water demand projections utilized for the IWP and UWMP (see DEIR page 4.1-25).

[2] "scwd² Seawater Reverse Osmosis Cooperative Desalination Program" Website – "Desalination for the City of Santa Cruz and Soquel Creek Water District. http://www.scwd2desal.org/Page-About_SC_SqCWD.php.

[3] See http://www.scwd2desal.org/.

The City is currently in the process of preparing design plans for the desalination facility based on the results of a pilot plant operation and other technical studies that have been prepared, and is initiating the preparation of a project-level EIR for the permanent desalination facility project. The current project schedule anticipates design in 2012 and construction to be completed in 2015. The operational strategy for the desalination facility would provide water supply during a drought to the City of Santa Cruz service area. During non-drought periods, the plant would provide water supply for Soquel Creek Water District. Concepts for an operational plan will be developed by the Task Force for final approval by the legislative bodies of both the City of Santa Cruz and Soquel Creek Water District.

Potential impacts of a desalination plant were evaluated as part of the program analysis in the IWP EIR, which also considered the conservation and curtailment components of the recommended IWP strategy. The programmatic impacts identified in the IWP EIR are summarized on pages 4.1-38 to 4.1-40 of the DEIR. The current analysis will include evaluation of all site-specific impacts related to the project, including greenhouse gas emissions, energy requirements, outfall monitoring, and impacts to marine species.

The DEIR acknowledges that there is some uncertainty as to the timing and approval of the desalination project. In the event that the facility is not approved or constructed, the City would implement more use curtailment restrictions than what is envisioned in its adopted IWP and UWMP. Under these plans, a 15% curtailment was deemed acceptable. Under multiple-year drought conditions and without the desalination facility, water shortages of about 46% would be experienced with the existing supplies. This would result in a more severe level of curtailment.

MASTER RESPONSE W-4: UCSC Campus Water Sources

[LA-1-18, OA-1-14, I-17-10, I-22-13, I-23-2, I-25-2]

Potential UCSC water sources include reclaimed water and groundwater sources for non-potable uses. The potential reclaimed sources are identified in the 2005 LRDP EIR Mitigation Measure UTIL-9G and are described on pages 4.1-40 and 4.1-41 of the Sphere of Influence Amendment DEIR. As indicated in these DEIR discussions, University studies indicate that rainwater harvesting and greywater use could supply a non-potable demand of 62 MGY, of which 28 MGY was estimated for new North Campus buildings and new Family Student housing. The DEIR considered these as potential water sources in the project impact analysis, but concluded that since there is no identified schedule for implementation nor does the City have control over UCSC development, these non-potable alternative water systems are not considered reasonably foreseeable City water sources. But to the extent that UCSC develops a program for implementation of any of these sources, the project water demand would be correspondingly reduced. The DEIR also notes that the 2005 LRDP EIR mitigation measures require that runoff from North Campus be allowed to infiltrate into the groundwater system, which might reduce the potential for rainwater harvesting in this area.

The DEIR also describes UCSC groundwater resources on pages 4-27 and 4.1-28. Use of existing wells for irrigation during drought years is a LRDP EIR mitigation measure (UTIL-9I). Approximately 1.1 MGY was estimated for non-potable use, and use of existing campus wells was not proposed for normal water years (University of California Santa Cruz, September 2006, 2005 LRDP Final EIR, Volume V, Response to Comment LA-3-14). Thus, the level of groundwater use envisioned under the 2005 LRDP appears to be limited to use during drought periods for some of the University's irrigation demand. As summarized on page 5-54 of the DEIR, the potential withdrawal of the estimated 1 MGY for irrigation during a drought is not expected to result in significant impacts. An existing well in the lower campus (Jordan Gulch) would be utilized, and the LRDP EIR concluded that due to the large size of the watershed and groundwater aquifer, the extraction of approximately 1 MGY would be minor (University of California Santa Cruz, September 2006, 2005 LRDP Final EIR, Volumes II and V). However, LRDP Mitigation HYD-5c also requires water level monitoring of wells and springs if an existing or new well is utilized due to potential downstream impacts.

On-campus groundwater resources and potential use were evaluated in the 2005 LRDP EIR based on studies conducted by Nicholas Johnson and Gerald Weber in 1989 and environmental review of a potential irrigation well for the Center for Agroecology and Sustainable Food (CASFS) and Arboretum in 1990 (John Gilchrist and Associates). As discussed on page 5-49 of the DEIR, University studies conducted in 1999 and 2000 (Nolan Associates) indicate that the North and Upper Campus areas are not considered viable long-term water sources.

For the reasons summarized above and discussed in the DEIR, the potential UCSC water sources (reclaimed water and limited groundwater use for irrigation) are not considered reasonably foreseeable, and, thus, the City did not consider them as feasible mitigation measures or reliable alternative water supplies. The reclaimed water sources were considered as an alternative in the DEIR on pages 6-30 and 6-31. Since the City does not have control over development of UCSC water sources nor can it require that such sources be developed, it was not considered a feasible alternative for further discussion in the DEIR.

It is reported that approximately 40% of the on-campus runoff is intercepted by the marble aquifer system, and that the groundwater storage within the saturated aquifer is estimated to be at least 3,000 acre-feet (University of California Santa Cruz, September 2006, 2005 LRDP Final EIR, Volume II). The four existing campus test wells have not been used to date, although one well has been used periodically for monitoring groundwater levels and water quality (Ibid.). The City of Santa Cruz issued four well permits to the University in 1988. The City regulates wells pursuant to section 16.06 of the Municipal Code in accordance with state law requirements. Two were for "monitoring" wells; one was to abandon what is referred to as "well 1"; and one was issued for a well referred to as "Well 3" that one was for what was called an "exploratory well." All the permits are conditioned to state that they are for the stated purpose only and that if any well is to become a production well, further permitting and CEQA compliance would be necessary.

Although, the 2005 LRDP and its EIR do not propose additional groundwater development, it appears that the use of Well 3 for production of non-potable irrigation water supplies would require a well permit pursuant to state law requirements. If UCSC were to develop other campus water sources in the future for which a new or reconstructed well were drilled, a well drilling permit would be required from the City with environmental review under CEQA as may be required. Additionally, use of groundwater that differs from what was evaluated in the 2005 LRDP EIR would be subject to additional environmental review under CEQA, and the primary likely issue would be potential impacts to downstream flows of off-campus springs and creeks. Any use of groundwater for potable purposes would require approval of the California Department of Public Health, which regulates and permits public water systems; for systems serving less than 200 service connections, permits would be subject to County of Santa Cruz approvals in accordance with state law.

For development of other non-potable reclaimed water sources, UCSC would not be subject to local permits. For most of the reclaimed water options (except for wastewater recycling), there do not appear to be any required state permits, but some elements may be subject to review by the Regional Water Quality Control Board and/or California Department of Public Health. Use of recycled wastewater would be subject to compliance with state regulations (Title 22).

❑ GROWTH INDUCEMENT & SECONDARY EFFECTS MASTER RESPONSES

MASTER RESPONSE GI-1: Request for HCP/NCCP for UCSC

[OA-2-1, OA-6-1, OA-7-6, OA-8-1, I-1-1, I-2-1, I-3-1, I-4-1, I-5-1, I-8-1, I-11-1, I-12-1, I-13-1, I-20-1, I-21-1, I-22-1, I-26-1]

Eleven comment letters were received that include the same "group letter" that expresses support of the U.S. Fish and Wildlife Service request for a preparation of a campus-wide Habitat Conservation Plan (HCP) in conjunction with a Natural Community Conservation Plan (NCCP). A number of other comments also express this concern and request. HCPs are implemented for federally listed species, and the NCCP program is administered by the California Department of Fish and Game (CDFG).

As indicated and discussed in the DEIR, the project actions would expand the City of Santa Cruz' Sphere of Influence and allow provision of extraterritorial water and sewer service to a portion of the UCSC North Campus in which the University has planned development as set forth in its adopted 2005 Long Range Development Plan (LRDP). The proposed project does not include UCSC development or any site-specific development, and the DEIR does not serve as an EIR for UCSC development as stated asserted in some of the petition comments. Future UCSC development is planned outlined in the University's adopted 2005 LRDP, which underwent its own environmental review. As indicated in the DEIR (pages 3-9, 3-10, 5-11),

future North Campus development would be within the jurisdiction of the University of California. The environmental analyses prepared for the 2005 LRDP were upheld in court pursuant to a stipulated judgment (see DEIR page 5-12 and Master Response PD-1, above). The City of Santa Cruz as a local agency does not have regulatory authority over the future development actions of the University. See also See Master Response PD-1 – Project Overview & Purpose for further clarification of the project description.

The City notes and appreciates the petitioners concern for a broader habitat management approach on the UCSC campus and refers the comment to UCSC for further consideration in its future North Campus planning efforts. However, neither the City nor LAFCO can require or compel the University to prepare the requested plans. Future campus development will be required to comply with all relevant state and federal regulations regarding protection of special status species. A HCP would need to be prepared if there is a potential "take" of a federally-listed species. The HCP would specify the measures needed to avoid the take in response to development being proposed. A NCCP is a regional effort that appears to be applied on a much larger scale than just the UCSC campus, as discussed below.

Although, site-specific development is not proposed as part of the proposed project, secondary impacts related to UCSC growth that would be accommodated by the project are addressed in Chapter 5.0 of the DEIR. Potential indirect, secondary impacts to biological resources (sensitive habitat, special status species, and wildlife nesting and movement) are discussed on pages 5-37 through 5-41 of the DEIR. The project area consists of a portion of the North Campus area of UCSC. Sensitive habitat and special status species known in the North Campus area include: northern maritime chaparral, coastal prairie, isolated depressional wetlands, riparian habitat, Santa Cruz manzanita, the San Francisco dusky-footed woodrat (a special status species), special status bat species, various non-special status bird species, and cave invertebrates.

There is no breeding habitat in the North Campus for the California red-legged frog (CRLF), a federally-listed threatened species, but there is some potential aquatic non-breeding habitat in Cave Gulch and its branches in the southwest quarter of the North Campus area. Transient or upland aestivating (in dormant state) CRLF may be present as individuals throughout the North Campus based on distance from breeding habitat at Arboretum Pond, occurrences in aquatic habitat in the Adams Creek tributary of Wilder Creek, and potential breeding habitat in San Lorenzo River. Non-breeding individuals may travel two or more miles from aquatic habitat. No CRLF have been found during surveys on the North Campus according to surveys conducted for the University that covered all locations on the north campus containing surface water, and followed the procedures specified in the Ventura office, USFWS 1997 site assessment methodology. The purpose of the surveys was habitat assessment, not to prove the absence of CRLF (Ecosystems West Consulting Group. 2000. ," Draft University of California, Santa Cruz, California Red-Legged Frog Site Assessment.")

Ohlone tiger beetle (OTB), a federal endangered species, inhabits open, sunlit grasslands that include CA oat grass and purple needle grass, with Watsonville loam and similar type soils. Crown Meadow and other small patches of grassland in the southeast part of the North Campus study area, include the coastal prairie grass species, but shading from surrounding trees in these areas minimizes the chance of the Ohlone tiger beetle being able to effectively utilize these small prairie remnants and the area thus does not appear to be suitable habitat for OTB (Entomological Consulting Services, 2000 and 2002).

The University of California Santa Cruz has prepared a habitat conservation plan for the Ohlone tiger beetle and California red-legged frog in conjunction with the Ranch View Terrace project, which was approved by the U.S. Fish and Wildlife Service in 2005. HCPs are prepared to mitigate the impacts of proposed activities that might incidentally result in harm or "take" of wildlife species that are listed as threatened or endangered, or to the habitat of these species. It is not anticipated that the proposed 2005 LRDP would result in take of threatened or endangered species or their habitat in the North Campus. If such impacts were to be identified, additional HCPs or appropriate consultation would be undertaken as required by USFWS regulations. (University of California Santa Cruz, September 2006, 2005 LRDP EIR, Volume V [Response to Comment FA-1-4]).

Natural community conservation plans (NCCPs are defined in the California Natural Community Conservation Planning Act. (Fish & G. Code, §§ 2800 et seq.) The purpose of a NCCP is to conserve natural communities at the ecosystem scale while accommodating compatible land uses. A NCCP is adopted by the Department of Fish and Game as well as local agencies with land use authority in a defined area. According to the CDFG's website, the "Natural Community Conservation Planning" (NCCP) program, which began in 1991, is "an unprecedented" effort by the State of California, and numerous private and public partners, that takes a broad-based ecosystem approach to planning for the protection and perpetuation of biological diversity. An NCCP identifies and provides for the regional or areawide protection of plants, animals, and their habitats, while allowing compatible and appropriate economic activity. There are currently 24 active plans throughout the state, most of which are hundreds of thousands of acres, substantially larger and more regional in scope than the UCSC campus.[4]

Regarding forest resources, it is noted that the LRDP EIR identified approximately 120 acres of forest land that would potentially be removed with about 73 acres occurring in the North Campus area. See also Master Response G I-2 –Forest Resources, below, for further discussion for forest resources and related habitat issues.

[4] California Department of Fish and Game. "Natural Community Conservation Planning (NCCP); online at: http://www.dfg.ca.gov/habcon/nccp/.

MASTER RESPONSE GI-2: Forest Resources

[RA-1-4, LA-1-27, SA-1-2, OA-2-1, I-14-5, I-22-9]

A number of comments address forest resources, and some indicate that conversion of forest lands on the North Campus should be considered a significant impact. Forest resources were addressed due to pending amendments to the State CEQA Guidelines, and the discussion was drawn from review in the UCSC 2005 LRDP EIR, as indicated on page 5-31 of the DEIR. The DEIR indicates that the removal would not be "substantial" in comparison to remaining forest land throughout the campus, county and state. The referenced paragraph pertains to forest resources for commercial timber harvesting. In this context, the conversion of forest lands was not considered substantial given the amount of acres devoted and designated for commercial timber harvesting elsewhere in the county and state, and the fact that large-scale commercial logging would be incompatible with the UCSC campus uses. The DEIR text has been clarified to indicate that this statement reflects removal of commercial forest land for timber harvesting with the reference to remaining commercial timber lands in the County; see the "Growth Inducement" subsection in the CHANGES TO DRAFT EIR (Chapter 3.0) section of this document. Additionally, it is noted that the LRDP EIR identified approximately 120 acres of forest land that would potentially be removed with about 73 acres occurring in the North Campus. Forest lands cover approximately 940 acres on the 2,000±-acre UCSC campus.

In addressing whether removal of forest land would be considered significant, other values provided by forest resources (in addition to potential commercial timber land) were also considered. As indicated above, the forest resources discussion was included in the DEIR in anticipation of amendments to the State CEQA Guidelines (Environmental Checklist) that were adopted on December 30, 2009 and became effective on March 18, 2010. Specifically, these amendments implement the Legislature's directive in Public Resources Code section 21083.05 (enacted as part of SB97 (Chapter 185, Statutes 2007)) that required the Resources Agency to certify and adopt guidelines prepared and developed by the Office of Planning and Research for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions (California Natural Resources Agency, December 2009). The amendments added an environmental checklist question regarding forestry primarily due to the direct link with greenhouse gas (GHG) emissions as forest conversions may result in direct GHG emissions, and conversions remove existing forest stock and the potential for further carbon sequestration (carbon is stored in vegetation), which is recognized as a key mitigation strategy in the Air Resources Board's Scoping Plan (California Natural Resources Agency, December 2009). However, the California Natural Resources Agency staff report on the amendments also found that questions related to greenhouse gas emissions in Appendix G were not sufficient to address impacts related to forestry resources, and it was indicated that forest conversions may also lead to aesthetics, biological resource and water quality impacts (Ibid.). It indicated that the Legislature has declared that "forest resources and timberlands of the state are among the most valuable of the natural resources of the state and that such resources furnish high-quality timber, recreational opportunities, and aesthetic enjoyment while providing watershed protection and maintaining fisheries and wildlife"(Public Resources

Code, § 4512(a)-(b)) (Ibid.). Thus, it appears that the basis for adding the question regarding forest resources was primarily due to GHG considerations, but also due to the need to consider the other important attributes provided by forests.

Based on the State's reasoning for including of forest resources in the CEQA checklist, the consideration of forest resources (and resulting impact significance) should account for impacts related to greenhouse gas emissions, loss of commercial timberland, value for biological habitat and watershed protection, and aesthetics. The DEIR text has been expanded to provide additional discussion of the issues as discussed above; see the "Growth Inducement" subsection (page 5-32) in the CHANGES TO DRAFT EIR (Chapter 3.0) section of this document.

Tree removal was considered in the cumulative discussion of greenhouse gas emissions (see page 6-22 and Appendix D of the DEIR). The analysis concluded that global climate change is a significant cumulative impact, and that potential indirect emissions due to future UCSC development were cumulatively considerable. None of the attributes/values provided by forest lands, however, would be significantly and unavoidably impacted by future North Campus development – commercial timber harvesting, sensitive habitat, special status species, water quality/erosion, or aesthetics – as summarized in the DEIR and discussed below. The North Campus area is part of a college campus, and although informal trails exist, it is not an existing or planned park or recreational area.

The loss of commercial timber land is addressed above and on page 5-32 of the DEIR. The LRDP EIR concluded that "timberland conversion" and tree removal activities would not remove substantial redwood and mixed evergreen forest habitat, and would not, in and of itself, be considered to be a significant impact to biological resources, as these are not considered sensitive natural communities by California Department of Fish and Game and are abundant in the region (University of California Santa Cruz, September 2006, 2005 LRDP EIR, Volume II). However, impacts to special status species for whom these forests provide habitat, and to wildlife movement, water quality, aesthetics, air quality, and noise, are analyzed in the 2005 LRDP EIR, and mitigations were required to reduce these impacts to a less-than-significant level and discussed in the Sphere of Influence DEIR (see pages 5-18, 5-19, 5-37 to 5-43, 5-52, 5=53). Additionally, the 2005 LRDP EIR acknowledges that development of the North Campus forested lands would constitute an irreversible use of these lands and would result in the loss of forest habitat, but again, mitigation measures would reduce impacts to sensitive biological resources and would preserve and enhance appropriate habitat elsewhere on campus lands (University of California Santa Cruz, 2005 LRDP Final EIR, September 2006, Volume V, Response to Comment SA-7-3).

Comments requesting that UCSC prepare a Habitat Conservation Plan (see Master Response GI – 1 Request for HCP/NCCP for UCSC) asserts that UCSC's conclusions about habitat loss is contrary to CEQA Guidelines section 15065 regarding mandatory findings of significance related to biological habitat and species. This section indicates that an impact would be significant if it would "substantially reduce" fish or wildlife habitat, cause a fish or wildlife

population to drop below self-sustaining levels, threaten to eliminate a rare or endangered species, or substantially restrict the range of an endangered species. Key considerations are whether the loss would be "substantial", which in relation to remaining habitat on-campus and regionally, the 2005 LRDP EIR concluded it was not considered substantial in and of itself, and other impacts related to special status species and sensitive habitats could be mitigated to a less-than-significant level. Moreover, as explained in the DEIR (pages 3-9 to 3-10), the proposed project does not directly involve or authorize the physical development of any new facilities in the North Campus area. If or when UCSC proposes new development in the North Campus area, UCSC will be required to undertake further, site-specific environmental review, as the LRDP provides, as well as the Comprehensive Settlement Agreement. Some commenters apparently disagree with the conclusions of the 2005 LRDP EIR regarding biological resource impacts, but they do not provide any new information justifying a change to the original conclusion that such impacts can be mitigated to a less-than-significant level.

One comment indicated that removal of dwarf redwoods should be considered significant. The 2005 LRDP EIR addressed this issue. Several stands of dwarf redwoods were identified on the campus, which exhibit dwarf stature, and were found to be extremely short in stature (10 to 15 feet tall) to moderately dwarfed (15 to 50 feet tall) compared to the height of typical adult redwoods that range from 100 to 340 feet tall (University of California Santa Cruz, 2005 LRDP Final EIR, Volume I). In some areas, the dwarf redwood stands are dense and composed only of these trees; in other areas, they are intermixed with chaparral, normal-stature redwoods, and Douglas fir. Dwarf redwoods are not recognized as a distinct natural community or vegetation association by the California Natural Diversity Database. The UCSC 1988 LRDP EIR considered them to be sufficiently rare to be recognized as a sensitive natural community, but later studies indicate that dwarf redwood stands are found throughout the range of coast redwoods where soil nutrients are lacking, or where other extreme conditions, such as salt spray near the coast, stunt growth, including other areas of Santa Cruz County and other counties – Monterey, Marin, and Alameda (Ibid.). Due to the distribution of dwarf redwoods, the on-campus stands were not considered sufficiently rare or threatened to qualify as a sensitive natural community under CEQA (Ibid.).

Potential impacts on drainage patterns, streams, and surface water and groundwater quality that could result from construction under the 2005 LRDP, including tree removal, are addressed on pages 5-50 to 5-54 of the DEIR. The potential for erosion of campus soils due to development, including tree removal, is addressed on page 5-47 of the DEIR. As indicated, impacts would be reduced to a less-than-significant level with implementation of mitigation measures and implementation of Best Management Practices in the campus *Storm Water Management Plan* that is part of the campus Storm Water Discharge Permit issued by the Regional Water Quality Control Board (University of California Santa Cruz, 2005 LRDP Final EIR, September 2006, Volume I). (See also Master Response GI – 3 Cave Gulch Erosion.)

As discussed on pages 5-18 and 5-19 of the DEIR, the 2005 LRDP EIR concluded that most of the new North Campus development would be screened by the surrounding forest, and,

therefore, impacts to scenic views would be less than significant. Under the policies of the 2005 LRDP, new development in the North Campus would be sited sensitively in order to maintain the campus pattern of clustered development surrounded by undeveloped landscape and protection of distinctive physical forms, and development areas are generally surrounded by areas designated as "Protected Landscape" and "Campus Natural Reserve" which would provide a buffer between future campus development and adjoining properties, such as the Cave Gulch neighborhood and Empire Grade Road. With the implementation of LRDP Mitigation Measures AES-5C and AES-5D, mature healthy trees would be preserved to the greatest extent feasible, and the campus will continue its site stewardship program to maintain the wooded visual character of the central and North Campus. The LRDP EIR concludes that these measures would help maintain the visual continuity of forested areas and would reduce potential impacts on the visual character of the central and north campus to less-than-significant levels. These measures would also ensure that forest areas would not appear substantially changed from off-campus locations. In the north campus area, trees also would be removed to make way for the North Campus loop road and North Campus development. (University of California Santa Cruz, 2005 LRDP Final EIR, September 2006, Volume V, Response to Comment SA-7-3). Additionally, Mitigation AES-5F addresses removal of individual trees that may be considered aesthetically valuable components of the landscape.

In conclusion, the future potential conversion of forest lands to development in the North Campus area of UCSC would result in greenhouse gas emissions that in combination with other emissions, is considered a cumulatively considerable contribution to a significant cumulative global climate change impact. However, none of the other attributes/values provided by forest lands would be significantly and unavoidably impacted by future North Campus development and tree removal. The lands are not designated for commercial timber harvesting, but tree removal would be subject to preparation of a Timber Harvest Plan submitted to the state. The removal would not eliminate sensitive habitat, and potentially significant impacts to special status species, water quality/erosion, or aesthetics can be mitigated to a less-than-significant level.

Tree replanting typically occurs on a site-specific basis with new development. The campus has been planting oak trees on the campus (e.g., in the East Field House area) as part of the Site Stewardship program. The campus has also planted redwoods along the slope below Crown College as mitigation for tree removal for the Biomedical Sciences Project.

MASTER RESPONSE GI-3: Cave Gulch Erosion

[SA-2-1; FA-2-2; OA-3-6; OA-4-7; OA-7-5; I-27-3, 4 & 6]

The DEIR (page 5-51) indicates that the 2005 LRDP EIR concluded that potential erosion impacts could be significant and unavoidable despite implementation of LRDP EIR mitigation measures because project-specific data were not available to determine feasibility of these measures for all future projects in the campus watersheds. The DEIR (page 5-52) further

reports the same conclusion for potential erosion in the Cave Gulch watershed. Since preparation and certification of the 2005 LRDP EIR, the University received approval of a General Phase II Municipal Storm Water Permit (General Permit) from the California Regional Water Quality Control Board (RWQCB), which requires UCSC to implement a Storm Water Management Plan (SWMP) that reduces the discharge of pollutants in storm water to the maximum extent practicable and protects water quality. UCSC's Storm Water Management Plan (October 2008) specifies extensive measures for the control of erosion resulting from new development. With implementation of these measures, erosion in the Cave Gulch watershed and other campus watersheds will be controlled, and significant unavoidable impacts are not expected. (See also Comment Letter SA-2 from the RWQCB.) The DEIR text has been revised (see the CHANGES TO DRAFT EIR [Chapter 3.0] section.

The following elements of the SWMP approved by the RWQCB in May 2009 as part of UCSC's NPDES Permit for campus-wide development that includes the North Campus and will minimize the increase in runoff and the resulting erosion in campus drainages, including Cave Gulch (see: http://cleanwater.ucsc.edu/swmp/index.html):

- BMP 55: Main Campus Planning and Design Requirements for Storm Water Management and Watershed Protection. Under this BMP, all main campus projects funded for design after September 2009 that increase impervious surface are required to provide volume control to the maximum extent practicable. The main campus includes the area identified as North Campus as well as the property in the contiguous campus boundary. In order to ensure that the standard of "maximum extent practicable" is achieved, the campus currently requires design professionals to utilize a narrative checklist of Low Impact Development practices. BMP 55 also requires the Campus to develop interim criteria for control and infiltration of runoff flows within one year of the enrollment in the NPDES permit program. These interim criteria will be replaced by the final criteria within five years or as part of a joint effort with the RWQCB which has a schedule to complete final criteria within the first two years of the permit. The final flow control and infiltration will include:
    - Numeric criteria for runoff rate, duration and volume control for development and redevelopment projects;
    - Numeric criteria for stream stability impacts for development and redevelopment projects;
    - Identification of areas within the University where these criteria must be met;
    - specific performance and monitoring criteria for installed hydromodification[5] control infrastructure;
    - Riparian buffer zone requirements;

[5] "Hydromodification" is used in stormwater management to refer to changes to the storm water runoff characteristics of a watershed caused by changes in land use.

- Appropriate hydromodification controls measures such as LID concepts, on-site hydrologic and water quality controls and in-stream controls.

- BMP 59: Hydromodification and Low Impact Development. This BMP requires training of campus project managers and inspectors in Low Impact Development and hydromodification to enable the full implementation of BMPs for new development.
- BMP 60: Operation and Maintenance of New Development BMPs. This BMP specifies procedures for assigning responsibility for operation and maintenance of structural storm water BMPs included in new development.

The flow control and infiltration requirements of the SWMP are consistent with LRDP Mitigation HYD-3D to minimize the increase in runoff and the resulting erosion, which is required to be implemented as part of any future campus development under the LRDP. LRDP Mitigation HYD-3D applies the same performance standard as the SWMP -- to the "maximum extent practicable." The Draft "Low Impact Development" (LID) checklist (Appendix G of the SWMP) lists the stormwater management features that must be considered for new development. These include preservation of natural areas, preservation of the most permeable soils on a particular site, minimization of impervious surface, use of pervious pavement, minimizing building footprint, disconnecting impervious surface, harvesting rainwater, infiltration trenches, planters or basins, and eliminating curbs and gutters. The checklist is online at:
http://cleanwater.ucsc.edu/swmp/Appendix_G_Draft_LID_Checklist.pdf.

CEQA CONSIDERATIONS MASTER RESPONSES

MASTER RESPONSE CC-1: Significant Unavoidable Impacts

[LA-1-29, OA-3-6, OA-4-7, OA-7-5, I-27-3]

Several comments requested that significant unavoidable impacts associated with future development of the North Campus be added to the "Significant Unavoidable Impacts" subsection of the CEQA CONSIDERATIONS (Chapter 6.0) section of the DEIR. These impacts were summarized on page 6-29 of the DEIR as part of the "Alternatives" review. These secondary impacts of indirect growth related to the proposed project were not included in Section 6.1 of the DEIR because these impacts result from potential campus development that would be served by the Sphere of Influence amendment project, but the proposed Sphere of Influence amendment project does not cause this growth. Therefore, these significant and unavoidable impacts are not considered new or more severe significant impacts resulting from the implementation of this project. The growth is already planned in the University's adopted 2005 LRDP and acknowledged in the Comprehensive Settlement Agreement. The SOI DEIR indicates that the proposed project would indirectly support this planned growth on the UCSC (see page 5.4). The DEIR also acknowledges that the University could further develop pursuant to its 2005 LRDP without necessarily constructing new facilities in the North

Campus area (page 6-35). For purposes of full public disclosure, however, the DEIR text has been revised to note the potential significant unavoidable impacts associated with future campus growth as may be modified based on review of comments received on the DEIR and the discussion below.

- Cave Gulch Watershed Erosion. As discussed in Master Response GI-3 above, implementation of the University's Storm Water Management Plan as approved by the Regional Water Quality Control Board would mitigate potential impacts, and this is no longer considered a significant and unavoidable impact.
- Population. The DEIR notes that the 2005 LRDP EIR concluded that population growth resulting from the LRDP would be a significant and unavoidable impact. That EIR was looking at direct impacts associated with campus growth. However, this EIR reviews potential growth inducement (as required by State CEQA Guidelines section 15126.2[d][6]) as an indirect impact of amendment of the City's Sphere of Influence and provision to extraterritorial services. As a result of the DEIR analysis, it was disclosed that potential increase in city population (including North Campus residents if the area is ultimately annexed to the City) is within or would slightly exceed AMBAG population projections for the year 2020, but would be within the projections for the year 2025, assuming that the project area would ultimately annex to the City of Santa Cruz. The population served by the proposed project would only slightly exceed the AMBAG population projections for the City of Santa Cruz in the year 2020 if all of the project area annexes to the City and all new employees move to the area from outside Santa Cruz County.

MASTER RESPONSE CC-2: Draft EIR Recirculation

[OA-1-1, OA-1-6, OA-1-7, OA-1-12, OA-1-16, , OA-5-13]

Several commenters ask for clarification on some DEIR issues and question whether the DEIR will be recirculated with the requested information. The issues relate to the legality of the LAFCO applications (see Response to Comment OA-1-1), project consistency with City and County General Plan policies and regulations (see Response to Comments OA-1-3, 4, 5 & 7), water supply adequacy (see Master Response WS-1), adequacy of the Water Supply Assessment (see Response to Comment OA-1-16), and general alleged "problems" in the EIR.

The State CEQA Guidelines section 15088.5 requires a lead agency to recirculate an EIR when "significant new information" is added to an EIR after public review but before certification. New information is not significant unless the "EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." "Significant new

[6] This section, as explained on page 5-1 of the DIER, requires discussion of growth inducing impacts, that addresses ways in which a project could directly or indirectly "foster economic or population growth", but that growth is not assumed to be necessarily beneficial, detrimental or of little significance to the environment.

information" that would require circulation according to this section of the State CEQA Guidelines include:

- A new significant environmental resulting from the project or from a new mitigation measures.
- A substantial increase in the severity of an environmental impact unless mitigation measures are adopted to reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impact of the project, but the project proponents decline to adopt it.
- The DEIR was so fundamentally inadequate that meaningful public review and comment were precluded.

The responses and clarifications provided in this document (in response to the comments where revision and recirculation are requested) do not result in any of the above conditions that would warrant recirculation. None of the revisions result in or indicate a new significant impact or a substantial increase in the severity of an impact associated with the proposed project. Additionally, LAFCO and several other commenters requested that the EIR include an alternative that addresses the provision of the requested services through annexation instead of merely an extension of extraterritorial services. This alternative has been added per the request of a responsible agency (see CHANGES TO DRAFT EIR [Chapter 3.0] section of this document) as a courtesy. The alternative provides a different organizational method of provision of services, but does not change the project area or service demands or result in a reduction or change in impacts. It is does not represent a feasible alternative "considerably different from others previously analyzed" that would lessen the project impacts (and that the project proponents decline to accept). Thus, this new alternative does not meet CEQA's criteria for recirculation. Similarly, Alternative 2 was revised to add a small potential development area adjacent to Empire Grade within the modified sphere of influence boundary considered in that alternative. Since Alternative 2 assumed full development of the North Campus, the addition of this small area for campus support facilities would not substantially alter the analysis for Alternative 2 that is included in the DEIR nor would it result in any new impacts or increased severity of impacts. Thus, the inclusion of this area in Alternative 2 does not trigger recirculation.

4.4 RESPONSES TO COMMENT LETTERS

Agencies, organizations and individuals that submitted written comments on the draft EIR are outlined above in section 4.2. Each letter of comment is included in this section. A response to each comment is provided immediately following each letter. Appropriate changes that have been made to the Draft EIR text based on these comments and responses are provided in the CHANGES TO DRAFT EIR (Chapter 3.0) section of this document.

Responses are provided to comment letters in the following order:

1. Responsible Agencies
2. Local Agencies
3. State Agencies
4. Federal Agencies
5. Organizations & Affiliations
6. Individuals
7. Comments on the "Water Supply Assessment"

RESPONSIBLE AGENCIES

The following subsection includes comments and responses to the following responsible agencies.

RA-1 Santa Cruz Local Agency Formation Commission (LAFCO)