



COMMITTEE FOR
GREEN FOOTHILLS



GREENBELT ALLIANCE



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Santa Clara Valley
Audubon Society

Monday, December 3, 2018

Chairperson Yeager and Commissioners
LAFCO of Santa Clara County
777 North First Street, Suite 410
San Jose, CA 95112

RE: MORGAN HILL URBAN SERVICE AREA AMENDMENT 2018

Dear Chairperson Yeager and Commissioners,

The Committee for Green Foothills, Greenbelt Alliance, Sierra Club Loma Prieta Chapter, and Santa Clara Valley Audubon Society support LAFCO staff's conclusion to deny the City of Morgan Hill's request to amend its Urban Service Area (USA) boundary. We respectfully request that you support staff's recommendation for denial.

The Morgan Hill USA Amendment 2018 is premature, growth inducing, incompatible with surrounding agricultural uses, and will cause significant and unavoidable impacts to air quality/greenhouse gas emissions, noise, and transportation. It is the first phase in implementing other portions of the City's Southeast Quadrant (SEQ) Land Use Plan – a plan incongruent with sustainable community strategies.

USA AMENDMENT IS NOT CONSISTENT WITH LAFCO MANDATE AND POLICIES AND COUNTY GENERAL PLAN POLICIES

In 2016, our organizations urged denial of the City's USA Amendment 2015 request that included Area 1 – Tennant-Murphy. Area 1 comprised a significant portion of the City's SEQ Land Use Plan including the USA amendment before you now. We urged denial of the request as a whole and *in part* as all were inconsistent with LAFCO mandate and policies, the County's General Plan including countywide urban growth management policies, portions of the South County Joint Area Plan, and the County's Land Use and Resource Conservation policies related to agricultural preservation. These same concerns apply to the City's current USA amendment request, which was *a part* of the City's 2015 Area 1 request denied by the Commission.

While the City has indicated where it may mitigate for 38 of the ~66 acres of prime farmland lost to development via this amendment, it does not address the growth inducing nature of the subsequent annexation and development. Nor does it address the additional impacts it will cause, including the reduction in farmland viability, increased speculative value of surrounding lands, and further loss of prime farmland, open space and foraging habitat that will impact local birds and wildlife.

USA AMENDMENT IS NOT CONSISTENT WITH OBJECTIVES AND GOALS OF SANTA CLARA VALLEY AGRICULTURAL PLAN

Since the Commission's denial of both the City's USA Amendment 2015 and the reconsideration request from the South County Catholic High School, the County Board of Supervisors adopted the Santa Clara Valley Agricultural Plan (Valley Ag Plan). The Valley Ag Plan, a recipient of the Governor's Environmental and Economic Leadership Award, is an innovative regional climate resilience and agricultural economic development strategy. The Plan seeks to help avoid future greenhouse gas emissions by reducing the conversion of farmland and rangeland and focusing development in existing urban areas thereby providing for a more sustainable agricultural future for the County.

The SEQ, and thus the USA Amendment 2018, is within the Valley Ag Plan's Agricultural Resource Area. Via the implementation of the Valley Ag Plan, the County is poised to enhance the viability and preservation of agriculture in the SEQ and further climate resilience goals. In doing so, it will also address concerns the City has expressed with leaving these lands within the County's jurisdiction.

Conversely, this USA Amendment and the City's overall plan for urban level development in the SEQ – that of public facilities and Sports-Recreation-Leisure uses – are not conducive to present or potential future farming operations in this area and will have significant and unavoidable impacts on air quality/greenhouse gas emissions. This makes the USA Amendment inconsistent with the Valley Ag Plan and hinders further implementation of the Plan in this sub-area of the Agricultural Resource Area. As American Farmland Trust stated in their February 2016 letter to LAFCO requesting the denial of the City's 2015 USA amendment, "None of the proposed zoning designations indicate the type of density that would be needed to avoid impacts on farmland."

RESUMPTION OF MULTIPARTY DISCUSSIONS PRESENTS POSSIBLE SOLUTION

In July 2014, the City was engaged in collective discussions with LAFCO, the County and the Santa Clara Valley Open Space Authority to “develop a SEQ proposal that better aligns with local and regional policies/goals”.¹ These discussions ended abruptly and without resolution when the City Council voted on their plan for urban development in the SEQ.

We have long maintained that resumption of these multiparty discussions could lead to the resolution of the important outstanding issues these agencies have with the City’s plan for the SEQ. The LAFCO staff report points out that construction on the first phase of the proposed private high school is not anticipated for another 4 to 6 years. This provides the City ample time to engage in good faith discussions with its regional partners to find a sensible and sustainable balance between community needs and desires.

Until that time, the City should refrain from any expansion of its urban service area until it has reached an agreement with its regional partners. The importance of sound land use planning cannot be overstated when one of the key goals is to truly preserve agricultural lands, ensure the long-term viability of farming, and a healthy sustainable community.

Thank you for your consideration of these comments.

Sincerely,



Julie Hutcheson
Director of External Affairs and Advocacy
Committee for Green Foothills



Kiyomi Yamamoto
Regional Representative, South Bay
Greenbelt Alliance



Michael Ferreira, Executive Committee Member
Sierra Club Loma Prieta Chapter



Shani Kleinhaus, Environmental Advocate
Santa Clara Valley Audubon Society

¹ Joint LAFCO - County of Santa Clara - Santa Clara Valley Open Space Authority letter to the Morgan Hill City Council dated November 5, 2014