



SANTA CRUZ COUNTY GROUP
 Of The Ventana Chapter
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March 4, 2012

Santa Cruz Local Agency Formation Commission
 701 Ocean St. 318-D
 Santa Cruz, CA 95060

Meeting Date: March 7, 2012
 Agenda Item 4b

Subject: UCSC North Campus

Chair Coonerty and Members of the Commission:

We write to register our strong opposition to the application submitted to you by the City of Santa Cruz which asks you to allow the City to expand its water service to UCSC's North Campus area, where the university intends to build 3 million square feet of office, research, housing and student facilities.

Federal and state regulators require the City to reduce its current withdrawal from the San Lorenzo River and north coast streams to sustain and restore the habitat of listed endangered anadromous species whose critical habitat is damaged by the city's water withdrawals. Letters addressed to you by NMFS (National Marine Fisheries Service, letter dated 2/10/2012) and DFG (CA Dept. of Fish and Game, letter dated 2/9/2012) clearly state that expansion of the water service area should not occur until an agreement has been reached with the City and a solution has been implemented to provide sufficient water to protect endangered species. The City has stonewalled the requests by these agencies for more than ten years and continues to do so.

Even if the University could achieve the proposed huge expansion of the campus in a water-neutral way, that would still not answer the need to reduce the City's current consumption. Water-neutral development means maintaining the status quo in water supply vs. usage. The federal and state agencies have made it clear that this is not sufficient. There is a clear and pressing need to reduce the current level of withdrawals from the watersheds.

Given the unpredictable effects of climate change on rainfall and the stated Federal and State requirements to leave more water in the streams, a huge expansion of the service area does not make sense until an agreement is reached between the agencies and the City.

The university's expansion requirements can be met elsewhere; the fishes' habitat requirements cannot. Therefore, we strongly urge you not to approve the request before you today until

an agreement is reached between the City and Federal and State agencies on water withdrawals
Please postpone approval until the federal and state agencies have indicated that suitable actions
are being taken to protect the basic environmental needs of the streams and habitats that sustain
endangered species. .

Thank you for your consideration of our comments.

Yours Sincerely,

A handwritten signature in black ink that reads "Michael Guth". The signature is written in a cursive style with a large initial "M" and a stylized "G".

Michael Guth
Chair, Executive Committee