



**San Diego County**  
**Local Agency Formation Commission**  
 Regional Service Planning | Subdivision of the State of California

**13**

**AGENDA REPORT**  
 Public Hearing | Action

February 4, 2019

**TO:** Commissioners

**FROM:** Keene Simonds, Executive Officer  
 Robert Barry, Chief Policy Analyst

**SUBJECT: Proposed “County Service Area No. 135 (Fire/EMS) Islands Reorganization” and Associated Sphere of Influence Amendments | Concurrent Latent Power Area Expansion and Annexations to Fire Protection Districts (RO16-20 et al.)**

**SUMMARY**

The San Diego Local Agency Formation Commission (LAFCO) will consider a proposal to establish formal fire protection and emergency medical services within three unserved island areas in unincorporated San Diego County totaling approximately 20,861.4 acres. The County of San Diego and its Fire Authority through County Service Area (CSA) No. 135 is the applicant and proposes a reorganization to divide the affected territory between five adjacent agencies through annexations and a latent power expansion. The subject agencies are Bonita-Sunnyside Fire Protection District (FPD), Lakeside FPD, San Miguel Consolidated FPD, Ramona Municipal Water District (MWD), and CSA No. 135. Conforming sphere of influence amendments are also required for all five subject agencies. Staff recommends approval with terms and includes requiring a subsequent proposal filing by the County to annex a portion of the affected territory into CSA No. 69. Protest proceedings would apply.

**BACKGROUND**

**Proposal Request**

San Diego LAFCO has received a resolution from the County of San Diego on behalf of its Fire Authority through CSA No. 135 proposing reorganization and multiple jurisdictional

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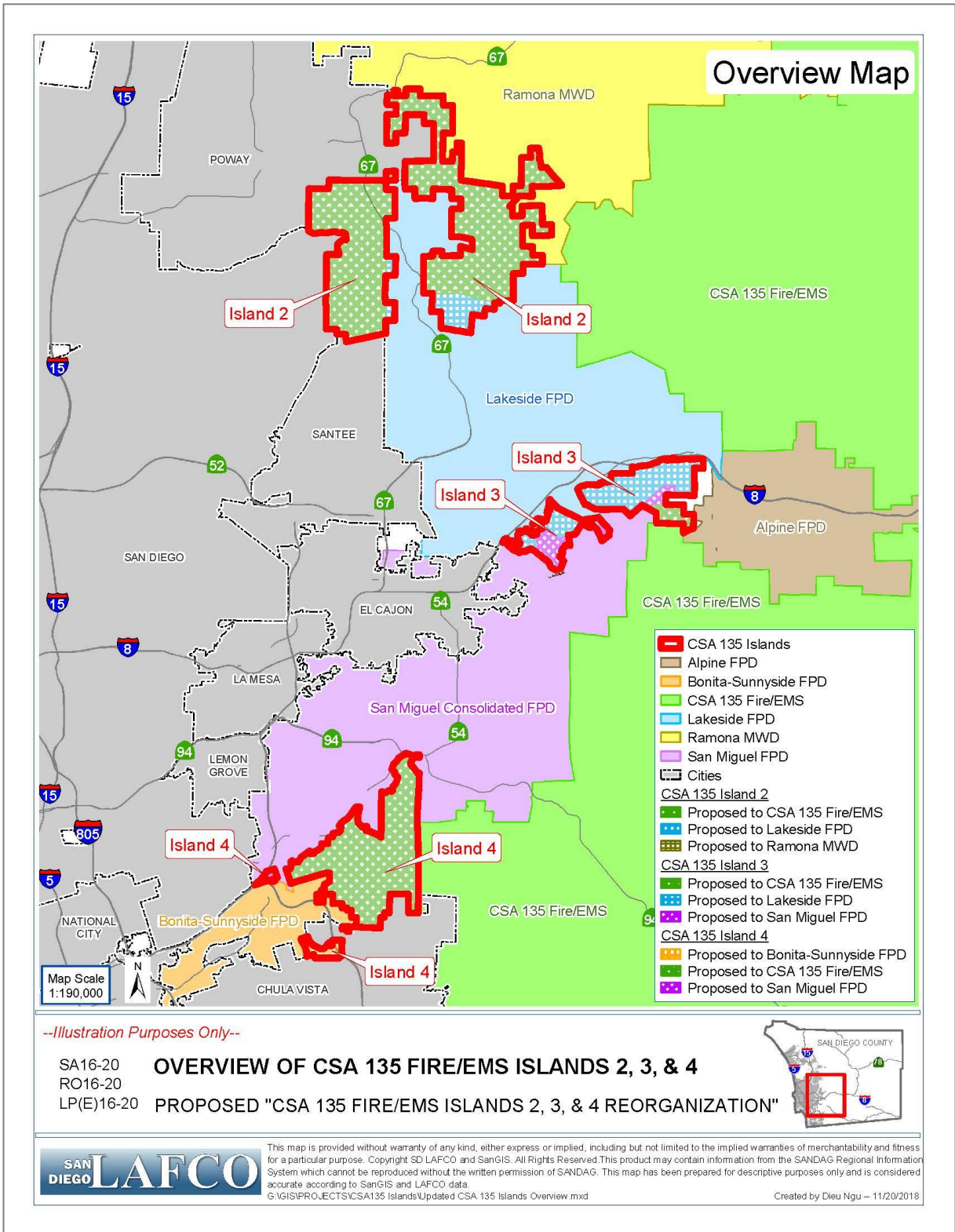
changes therein involving three distinct unincorporated areas totaling 20,861.4 acres. All of the affected territory was previously identified and designated for future inclusion within CSA No. 135 subsequent to the third phase of the County's 2008 plan for regionalization of fire services. However, and following consultation with stakeholders, a new agreement emerged and represents the proposal before the Commission to divide the formal establishment of fire protection and EMS within the affected territory between the five subject agencies and based on delivery efficiencies. Approximately 4/5 of the affected territory is proposed for a latent power expansion to CSA No. 135 with the remaining 1/5 proposed for annexation to Bonita-Sunnyside FPD, Lakeside FPD, San Miguel Consolidated FPD, and Ramona MWD, respectively.

### **Affected Territory**

The affected territory is entirely unincorporated and divided into three distinct areas referred to as Islands 2, 3, and 4. The affected territory lies adjacent to the unincorporated communities of Lakeside (Island 2), Crest-Dehesa/Alpine (Island 3), and Bonita (Island 4) and collectively subject to the County of San Diego General Plan and respective local community plans for its land use and zoning designations. The affected territory is primarily undeveloped and generally designated as open space and public agency lands, with limited amounts of rural residential uses. San Diego LAFCO estimates the total resident population with the affected territory is 392. Additional details on the proposed breakdown of the affected territory and accompanying jurisdictional changes follows:

- Annexation of approximately 274 acres in Island 4 to Bonita-Sunnyside FPD. This portion consists of 56 parcels with an estimated population of 3.
- Annexation of approximately 3,274 acres in Islands 2 and 3 to Lakeside FPD. This portion consists of 62 parcels with an estimated population of 83.
- Annexation of approximately 694 acres in Islands 3 and 4 to San Miguel Consolidated FPD. This portion consists of 17 parcels with an estimated population of 12.
- Annexation of approximately 17 acres in Island 2 to Ramona MWD. This portion consists of 2 parcels with an estimated population of 3.
- Expansion of the activated fire protection and EMS latent powers area of CSA No. 135 to include approximately 16,602 acres within Islands 2, 3, and 4. This portion consists of 324 parcels with an estimated population of 292.

The following map reflects the affected territory, jurisdictional boundaries for the subject agencies, and local municipal boundaries.



## Subject Agencies

The reorganization proposal filed with San Diego LAFCO involves five subject agencies: Bonita-Sunnyside FPD; Lakeside FPD; San Miguel Consolidated FPD; Ramona MWD; and CSA No. 135.<sup>1</sup> Summaries of the subject agencies follow.

- **Bonita-Sunnyside FPD** is an independent special district governed by a three-member Board elected at-large to four-year terms. Bonita-Sunnyside FPD began in 1950 as the Upper Sweetwater Valley Volunteer Fire Department and later organized into its current form in September 1952. The estimated resident population within Bonita-Sunnyside FPD is approximately 13,403 (SANDAG, 2016). Services provided include structural fire protection, advanced life support-level (ALS) EMS, rescue services, and hazardous materials within a jurisdictional boundary spanning approximately 7.0 square miles within the unincorporated community of Bonita. Primary land uses within the jurisdictional boundary are residential and commercial along with a sizable amount of public park and conservation areas. Bonita-Sunnyside FPD operates one fire station located at 4900 Bonita Road and averages 1,700 calls annually or 5 per day with dispatch provided by Heartland Communications Authority.<sup>2</sup> LAFCO approved a larger-than-agency sphere of influence for the Bonita-Sunnyside FPD in 1985. The sphere was updated in 2013 and includes 3,081 non-jurisdictional acres.
- **Lakeside FPD** is an independent special district governed by a five-member Board elected at-large to four-year terms. Lakeside FPD was formed in 1963 and has an estimated resident population of approximately 62,684 (SANDAG, 2016). Services provided include structural fire protection and advanced life support-level (ALS) EMS within a jurisdictional boundary spanning approximately 45.19 square miles of unincorporated territory northeast of the Cities of Santee and El Cajon. The Lakeside FPD jurisdictional boundary is anchored by the unincorporated community of Lakeside and is part of the County's Lakeside Community Planning Area. Lakeside FPD operates five fire stations and averages 9,000 calls annually or 25 per day with dispatch provided by Heartland Communications Authority. LAFCO approved a larger-than-agency sphere of influence for the Lakeside FPD in 1983. The sphere updated in 2017 and presently includes 2,988 non-jurisdictional acres.<sup>3</sup>
- **San Miguel Consolidated FPD** is an independent special district governed by a seven-member Board elected at-large to four-year terms. Services provided include structural fire protection and advanced life support-level (ALS) EMS within approximately 46 square miles in the unincorporated east county. San Miguel Consolidated FPD current service area is the product of a series of previous

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<sup>1</sup> State law defines "subject agency" to mean any district or city for which a change of organization or reorganization is proposed.

<sup>2</sup> Bonita-Sunnyside FPD is a member of the Heartland Communications Authority JPA for dispatch and is a founding member of the Regional Cooperative Care Partnership (RCCP), a consortium of emergency services which provides administrative oversight. Bonita-Sunnyside FPD is also an active participating member of the Heartland Fire Training Authority and South Bay In-Service Training.

<sup>3</sup> Lakeside FPD is a member of the Heartland Communications Authority JPA for dispatch services and a founding member of the Regional Cooperative Care Partnership (RCCP), a consortium of emergency service agencies, which provides administrative oversight for ALS services and paramedic ambulance transport.

consolidations among fire protection districts with details provided in the accompanying footnote<sup>4</sup>. The estimated resident population is 125,300 (SANDAG, 2016). San Miguel Consolidated FPD operates eight fire stations and averages 12,000 calls annually or 33 per day with dispatch provided by Heartland Communications Authority.<sup>5</sup> LAFCO approved a larger-than-agency sphere of influence for San Miguel Consolidated FPD in 1987. The sphere was last updated in 2017 and presently includes 1,164 non-jurisdictional acres.

- **Ramona MWD** is an independent special district governed by a five-member Board elected by division to four-year terms. Services provided include water, fire protection and EMS, wastewater, and park and recreation to a local residential population estimated at 35,143 (SANDAG, 2016) within the unincorporated east county community of Ramona. Ramona MWD began in 1956 as the newly-formed successor of the Ramona Irrigation District and later assumed fire services in 1981 through a latent power activation with the annexation of lands from the dissolved Ramona Fire Protection District.<sup>6</sup> CALFIRE has been the contract fire protection/EMS provider within Ramona MWD since 1993. Ramona MWD averages 3,700 calls annually or 10 per day with dispatch provided by CALFIRE. LAFCO approved a larger-than-agency sphere of influence for Ramona MWD in 1983. Subsequent annexations have removed all non-jurisdictional territory within the sphere, making it coterminous with the Ramona MWD jurisdictional boundary. The sphere was last updated in 2014.
- **CSA No. 135** is a dependent special district governed by the County Board of Supervisors. CSA No. 135 was formed in 1994 for the initial and limited purpose of providing a public safety regional communications system spanning all of the unincorporated area and within 10 of the 18 cities.<sup>7</sup> Services were expanded in 2008 through a latent power activation by LAFCO to include fire protection and EMS services within a designated portion of the District’s unincorporated jurisdictional boundary. The activation represented a significant marker in a multi-year planning effort by the Board of Supervisors to create the County Fire Authority and formalize fire protection in the unincorporated areas with additional details footnoted.<sup>8</sup> The estimated resident population within the fire and EMS boundary is 41,346. The

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<sup>4</sup> In 1988, the Grossmont-Mt. Helix FPD and Spring Valley FPD consolidated to form the original San Miguel Consolidated FPD. In 1994, the Bostonia and Crest FPDs consolidated to form the East County FPD—which subsequently consolidated with the San Miguel Consolidated FPD in 2008. The successor of the most recent consolidation retained the name San Miguel Consolidated FPD. The boundary of the San Miguel Consolidated FPD reflects the territory and spheres-of-influence of each FPD that was absorbed and includes the unincorporated communities of Bostonia, Casa de Oro, Crest, Grossmont/Mt Helix, Rancho San Diego, Spring Valley, and unincorporated areas adjacent to the Cities of El Cajon, La Mesa, and Lemon Grove. The Bostonia area, which was part of the former East County FPD, is geographically separate from the principal San Miguel Consolidated FPD service area.

<sup>5</sup> San Miguel Consolidated FPD is a member of the Heartland Communications Authority JPA for dispatch services and a founding member of the Regional Cooperative Care Partnership (RCCP), a consortium of emergency service agencies, which provides administrative oversight for ALS services and paramedic ambulance transport.

<sup>6</sup> The MWD is a member-agency of San Diego County Water Authority and imported water provides 100 percent of the District’s water supply.

<sup>7</sup> CSA No. 135’s regional communications system involves an 800 megahertz radio signal operated by County Sheriff.

<sup>8</sup> San Diego LAFCO’s 2008 approval to activate CSA No. 135’s latent powers fulfilled the first of a three-part County plan to extend fire protection throughout the unincorporated area and marked by initially assuming services for nearly one dozen volunteer companies. The second part was approved by LAFCO in December 2011 and expanded the latent powers area by over 136,000 acres and in step with the concurrent dissolutions of five dependent special districts: CSA Nos 109, 110, 111, 112, and 113. The third part involves dissolution of independent special districts and concurrent expansion of CSA No. 135’s latent powers to assume fire protection responsibilities therein. This final step commenced in 2015 with LAFCO approving reorganizations involving Pine Valley and Rural FPDs. The joint-reorganization to dissolve Julian-Cuyamaca FPD and transfer all fire protection and emergency medical services to County Fire Authority through CSA No. 135 is part of this third phase.

County Fire Authority contracts with CALFIRE for all field services. CSA No. 135 averages 5,567 calls annually or 15 per day with dispatch provided by CALFIRE. LAFCO approved a matching and service-specific sphere of influence for CSA No. 135’s fire and EMS latent power boundary in 2008. The sphere was last updated in 2011.

### **Affected Local Agencies**

The affected territory lies within the jurisdictional boundaries of the following local agencies directly subject to San Diego LAFCO.<sup>9</sup>

- County Service Area No. 26 (Rancho San Diego)
- County Service Area No. 128 (San Miguel Park)
- Pomerado Cemetery District
- Ramona Cemetery District
- Resource Conservation District of Greater San Diego County
- San Diego County Flood Control District
- San Diego County Street Lighting District
- San Diego County Sanitation District
- Grossmont Healthcare District
- Palomar Health Healthcare District
- Otay Water District
- Padre Dam MWD
- South Bay Irrigation District
- San Diego County Water Authority
- Metropolitan Water District of Southern California

### **DISCUSSION**

This item is for San Diego LAFCO to consider approving – with or without discretionary modifications – the reorganization proposal to establish formal fire protection and EMS within the affected territory through respective annexations and latent power expansions of the five subject agencies: Bonita-Sunnyside FPD; Lakeside FPD; San Miguel Consolidated FPD; Ramona MWD; and CSA No. 135. The Commission may also consider applying conditions so long as it does not directly regulate land use, property development, or subdivision requirements. Specific action approvals underlying the proposed reorganization under LAFCO law follows.

- 1) Amend the spheres of influence for Bonita-Sunnyside FPD, Lakeside FPD, San Miguel FPD, and Ramona MWD to include designated portions of the affected territory.
- 2) Amend and expand CSA No. 135’s service-specific sphere of influence for fire protection and EMS to include the remainder of the affected territory.

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<sup>9</sup> State law defines “affected local agency” as any entity that contains, or would contain, or whose sphere contains or would contain, any territory for which a change of organization is proposed or ordered. Notice of the proposal and hearing were provided to the agencies.

- 3) Approve annexation of the designated portions of the affected territory as follows:
  - a) Annex 274.1 acres within Island 4 to Bonita-Sunnyside FPD;
  - b) Annex 3,274.3 acres within Islands 2 and 3 to Lakeside FPD;
  - c) Annex 694.4 acres within Islands 3 and 4 to San Miguel FPD; and,
  - d) Annex 17.3 acres within Island 2 to Ramona MWD.
  
- 4) Expand CSA No. 135's existing fire protection and EMS latent power area to include the remaining portion of the affected territory totaling 16,601.7 acres in Islands 2, 3, and 4.

Additional discussion with respect to proposal purpose and Commission focus follows.

### Proposal Purpose

The purpose of the proposed reorganization is to establish formal fire protection and EMS within three unincorporated island areas that are not presently located within the jurisdictional boundaries of an authorized local public agency. The three island areas were identified for potential inclusion within CSA No. 135 following completion of Step III of the County's 2008 plan for regionalizing fire services in San Diego County. However, after consultation with stakeholders, a modified reorganization has been proposed with agreement from all five subject agencies to proportionally divide the affected territory based on respective proximity of available resources. Approval of the proposed reorganization would eliminate three islands of unserved territory totaling approximately 20,861.4 acres.

### Commission Focus

Staff has identified three central and sequential policy items for San Diego LAFCO in considering the merits of the reorganization proposal. These central policy items for Commission consideration are the stand-alone merits of (a) premising amendments to the spheres of influences of the five subject agencies, (b) timing of the reorganization involving the proportional jurisdictional changes, and (c) whether discretionary modifications and/or terms are appropriate. The Commission must also consider other relevant statutes within and outside of LAFCO law as detailed in the succeeding sections.

### ANALYSIS

The analysis of the reorganization proposal is organized into two subsections below. The first subsection considers the three central and sequential policy issues introduced in the preceding section. This pertains to evaluating the merits of the premising sphere of influence amendments, the timing of the associated reorganization involving the five subject agencies, and whether approval modifications and/or terms are appropriate. The second subsection considers other germane issues under LAFCO law or applicable State statutes and highlighted by the California Environmental Quality Act (CEQA).

## Central Policy Items

### Item No. 1 | Sphere of Influence Amendments

The reorganization proposal necessitates San Diego LAFCO concurrently approve a series of related sphere of influence amendment actions under Government Code 56375.5 and provisions therein requiring consistency between jurisdictional changes and affected agencies’ spheres. These sphere actions are divided into two distinct categories. The first category involves traditional amendments to the spheres for Bonita-Sunnyside FPD, Lakeside FPD, San Miguel FPD, and Ramona MWD to include the respective annexation areas in Islands 2, 3, and 4.<sup>10</sup> The second category involves amending and expanding CSA No. 135’s service-specific sphere for fire protection and EMS to include the remaining affected territory in Islands 2, 3, and 4. (CSA No. 135’s primary sphere – which is for emergency radio communications and already includes all of the affected territory – would not be amended as part of this reorganization.). Consideration of these actions is premised on the Commission’s statutory tasks to both designate spheres to demark the affected agencies’ appropriate current and future service areas relative to community benefits and needs as determined by the membership. Consideration is further premised on the use of spheres as policy tools to inform subsequent decision-making and applicability to known and/or future proposals.

Staff believes it would be appropriate for the Commission to proceed and approve the sphere of influence amendments described above for the cumulative effect of directing local agency resources to eliminate three islands of unserved territory totaling approximately 20,861.38 acres. Approving the sphere amendments would appropriately signal the Commission’s determination the affected territory merits organized fire protection and EMS while designating the five subject agencies – based on both service planning and germane communities of interest – are proportionally best positioned to address these needs through the foreseeable future.

#### Conclusion | Merits of Sphere of Influence Amendments

Approval of the sphere of influence amendments to facilitate the elimination of three islands of unserved territory and proportionally designate the subject agencies as the appropriate current and future providers of fire protection and EMS for the respective affected territory is warranted. Justification is marked by the preceding analysis and highlighted by emphasizing the role of spheres to facilitate the realignment of local government services in step with their highest and best uses relative to local conditions. Additional analysis supporting the conclusion – including addressing the mandatory factors required under LAFCO law – is provided as part of Appendix A.

<sup>10</sup> Ramona MWD is a retail member agency of the imported water wholesaler San Diego County Water Authority (CWA), which in turn is a member of the water wholesaler Metropolitan Water District of Southern California (MET). Accordingly, Ramona MWD’s sphere is coterminous with the CWA/MET spheres; however, the proposed sphere amendment would only be applied to Ramona MWD for fire protection/EMS services. No changes to the underlying CWA/MET spheres are proposed.



## Item No. 2 | Reorganization Timing

The reorganization proposal involves five concurrent jurisdictional changes divided between respective annexations to Bonita-Sunnyside FPD, Lakeside FPD, San Miguel Consolidated FPD, Ramona MWD, and expansion of CSA No. 135's activated fire protection and EMS services latent power area. State law emphasizes San Diego LAFCO consider the timing of the reorganization relative to the need and adequacy of the subject services as well as consistency with various local policies. This latter item includes the effects of the reorganization on the Commission's directive from the Legislature to enact orderly and efficient local government.

Staff believes the timing of the reorganization is appropriate and highlighted by the analysis of the specific factors required for consideration under LAFCO law anytime jurisdictional changes – including annexations and latent power area expansions – are proposed. The majority of the prescribed review factors focus on the impacts of the reorganization on the administrative, service, and financial capacities of the *receiving* agencies - Bonita-Sunnyside FPD, Lakeside FPD, San Miguel Consolidated FPD, Ramona MWD, and CSA No. 135 – in relation to the respective jurisdictional changes (emphasis added). No single factor is determinative. A summary of key conclusions generated in the review of these items follows.

- Service Needs

The proposed reorganization serves as a continuation of Step III of the County's 2008 fire service regionalization plan by eliminating three remaining unserved islands and establishing fire protection and EMS responsibilities among local government to meet present and planned needs within the affected territory.<sup>11</sup> The present and planned land uses of the affected territory merits organized fire protection and EMS services and highlighted by existing residential population of 392 coupled with providing front-line defense to the wildland interface along the eastern perimeter. The affected territory has received - and continues to receive - mutual aid incident responses from the subject agencies, averaging less than 100 per year over the last five years. Approval of the proposed reorganization provides certainty with respect to service responsibilities within the affected territory and synchs with the subject agencies that can most efficiently provide the services from existing fire stations.

- Service Capacities and Levels

Information collected and analyzed in reviewing the reorganization proposal indicates all five subject agencies have sufficient capacities available to efficiently extend fire protection and EMS proportionally within the affected territory without

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<sup>11</sup> The San Diego County Fire Authority was established by County ordinance in July 2008 to provide fire protection and emergency medical services (EMS) coverage for approximately 1.5 million acres within unincorporated San Diego County. In October 2008 LAFCO activated CSA No. 135's latent power for fire protection/EMS services and established a coterminous service-specific sphere of influence within a restricted area of the CSA. LAFCO's 2008 activation of CSA No. 135's latent powers fulfilled Step I of a three-part County plan to reorganize and extend fire protection and EMS services throughout the County Fire Authority. The 2008 latent powers activation area included 60% of the planned Fire Authority service area. Step II of the County's plan involved LAFCO-approved expansions of the fire protection/EMS latent powers area in 2011 and 2016 within the remaining 40% of the planned Fire Authority service area.

adverse impacts to existing constituents. Additional details relating to the service capacities and levels for each of the five subject agencies follows.

- **Bonita-Sunnyside FPD** services are provided out of one fire station (Station 2) located at 4900 Bonita Road, Bonita. Total dispatch incidents average 1,700 calls annually or 5 per day. Total personnel is 14 and this includes 13 career firefighters. Bonita-Sunnyside FPD owns two fire engines and provides a minimum engine staffing level of 3 personnel. Emergency ambulance transport service in the Bonita Sunnyside area is provided by American Medical Response (AMR). The current ISO rating for the Bonita-Sunnyside FPD community is 3. The anticipated demands in the portion of the affected territory (Island 4) proposed for annexation to Bonita-Sunnyside FPD in less than 1% of its baseline conditions.
- **Lakeside FPD** services are provided out of five fire stations: Station 1, 9726 Riverview Avenue, Lakeside; Station 2, 11211 Valle Vista Road, Lakeside; Station 3, 14008 Hwy. 8 Business, El Cajon; Station 4, 15245 Oak Creek Road, El Cajon; and Station 5, 12365 Parkside Street, Lakeside. Total dispatch incidents average 9,000 calls annually or 25 per day. Ambulance transport services within Lakeside FPD are authorized and funded by CSA No. 69 (Heartland Paramedic) and provided directly via contract with AMR. Total personnel is 58 and this includes 52 career firefighters. Lakeside FPD owns six fire engines and provides a minimum engine staffing level of 3 personnel. The current ISO rating for the Lakeside FPD community is 2/2y. The anticipated demands in the portion of the affected territory (Islands 2 and 3) proposed for annexation to Lakeside FPD in less than 1% of its baseline conditions.
- **San Miguel Consolidated FPD** services are provided out of eight fire stations: (1) Station 14, 3255 Helix Street, Spring Valley, (2) Station 15, 2850 Via Orange Way, Spring Valley; (3) Station 16, 905 Gillespie Drive, Spring Valley; (4) Station 21, 10105 Vivera Way, La Mesa; (5) Station 22, 11501 Via Rancho San Diego, El Cajon; (6) Station 23, 2140 Dehesa Road, El Cajon; (7) Station 18, 1811 Suncrest Boulevard, El Cajon; and (8) Station 19, 723 E. Bradley Avenue, El Cajon. Total dispatch incidents average 12,000 calls annually or 33 per day. Total personnel is 85 and this includes 78 career firefighters. San Miguel Consolidated FPD owns 12 Type-1 fire engines, 4 brush engines, and 1 truck company and provides a minimum engine staffing level of 3 personnel. Ambulance transport services within San Miguel Consolidated FPD are provided by CSA No. 69 (Heartland Paramedic) and AMR. The current ISO rating for the San Miguel Consolidated FPD community is 3. The anticipated demands in the portion of the affected territory (Islands 3 and 4) proposed for annexation to San Miguel Consolidated FPD in less than 1% of its baseline conditions.
- **Ramona MWD** fire protection and EMS services are provided out of three fire stations: (1) Station 80, 829 San Vicente Rd., Ramona; (2) Station 81, 24462 San Vicente Rd., Ramona; and (3) Station 82, 3410 Dye Rd., Ramona. Total dispatch

incidents average 3,700 calls annually or 10 per day. Total local personnel includes 32 career firefighters contracted through CALFIRE. CALFIRE provides three fire engines and a minimum engine staffing level of 3 personnel. Ambulance transport services within Ramona are provided by Ramona MWD and staffed by CALFIRE paramedics. The current ISO rating for the Ramona community is 4/9. The anticipated demands in the portion of the affected territory (Island 2) proposed for annexation to Ramona MWD in less than 1% of its baseline conditions.

- **CSA No. 135** fire protection and EMS services are provided through the County Fire Authority via contract with CALFIRE out of existing fire stations located adjacent to the affected territory: Station 86 - Ramona/Mt. Woodson, 16310 Hwy. 67, Ramona (Island 2); Station 24 - Harbison Canyon, 551 Harbison Canyon Road, El Cajon (Island 3); and Station 20 - Monte Vista, 2249 Jamacha Road, El Cajon (Island 4). Total CSA No. 135 dispatch incidents average 5,567 responses annually or 15 per day. County Fire Authority currently contracts 119 CALFIRE sworn staff. CALFIRE provides a minimum engine staffing level of 3 personnel. County Fire Authority owns a total of 28 structural engines and 4 wildland engines. The current ISO rating for the County Fire Authority community is 3/3y. The anticipated demands in the portion of the affected territory (Islands 2, 3 and 4) proposed for inclusion within the activated fire and EMS boundary are less than 1% of its baseline conditions.
- Service Funding and Costs  
All five subject agencies have the financial resources to assume and provide proportional fire protection and EMS in support of existing and planned development within the affected territory. This comment is reflected in the staff analysis of the agencies' financial statements, which shows – and among other items – positive total margins for each agency in their most recent audit reports. Further, and as detailed in the succeeding section, the agencies will offset their new costs through additional property taxes per its negotiated agreements.
- Local Conditions  
All of the subject agencies have been consulted by the County Fire Authority and consent to their respective jurisdictional change involving the affected territory. No opposition to the reorganization has been received.

### Conclusion | Merits of Reorganization Timing

The timing of the reorganization and establishment therein of fire protection and EMS in the affected territory is warranted. Justification is marked by the preceding analysis and highlighted by the immediate ability of all five subject agencies to provide consistent and effective service levels within the presently-unserved affected territory based on existing resources. Additional analysis supporting the conclusion is provided in Appendix B.

### Item No. 3 |

#### Modifications and Terms

No boundary modifications to the reorganization proposal have been identified by staff meriting consideration by San Diego LAFCO. Approval would eliminate three large unserved islands adjacent to CSA No. 135's activated fire protection and EMS latent power area. Terms are recommended and include a special condition identified by LAFCO staff. The special term involves the County initiating a subsequent jurisdictional change to annex a portion of the affected territory tallying 3,274 acres within Islands 2 and 3 to CSA No. 69 for purposes of ensuring consistent ambulance transport coverage within Lakeside FPD. Conforming sphere of influence amendments would also be required. The special term would be conditioned to require a certificate of completion for the secondary proposal. Standard terms are also recommended and include payment of any outstanding fees.<sup>12</sup>

#### Conclusion | Merits of Modifications and Terms

No modifications to the reorganization boundary appear warranted. A special term requiring initiation of a second jurisdictional change proposal by CSA No. 135 involving a sphere of influence amendment and annexation to CSA No. 69 (Heartland Paramedics) for the portions of the affected territory annexed to Lakeside FPD is recommended. Standard terms are also recommended.

#### Other Statutory Considerations

##### Exchange of Property Tax Revenues

California Revenue and Taxation Code (RTC) Section 99(b)(6) requires the adoption of a property tax exchange agreement by the affected local agencies before LAFCOs can consider jurisdictional changes. Markedly, and pertinent to this reorganization proposal, RTC Section 99(b)(5) allows the County Board of Supervisors to adopt a single resolution establishing a tax exchange on behalf of the affected agencies given their status as special districts. Accordingly, at its January 29, 2019 meeting, the Board of Supervisors is scheduled to adopt negotiated property tax exchange covering the proposal and subject agencies. The agreement establishes a new Annual Tax Increment (ATI) of 5% of the 1% property taxes attributable to the County General Fund for the subject agencies. These revenues will be transferred from the County to the respective agency that will incur the cost of providing fire protection services. As of July 2018, the total assessed value of the affected territory is \$85.8 million. The future ATI revenues to be transferred to Bonita-Sunnyside FPD, Lakeside FPD, San Miguel Consolidated FPD, Ramona MWD, and CSA No. 135 from ad valorem property taxes within Islands 2, 3, and 4 is estimated to total \$42,912.

<sup>12</sup> CSA No. 135 did not request special terms to the reorganization in its own resolution of application.

## Environmental Review

CEQA requires San Diego LAFCO to assess whether environmental impacts would result from activities approved under the Commission's statutory authority. Accordingly, San Diego LAFCO is tasked with making two distinct determinations under CEQA with respect to the proposal. This involves the (a) accommodating sphere of influence amendments and the (b) reorganization itself. The County of San Diego initiated the reorganization in 2016 by resolution of application to expand CSA No. 135's service-specific sphere and activated fire protection and EMS latent powers area to include all of the affected territory. The County - as lead agency - determined that the proposed sphere and latent powers area expansions for CSA No. 135 were categorically exempt from CEQA under State CEQA Guidelines Section 15061(b)(3). However, the proposal was subsequently modified by agreement with stakeholders to annex certain portions of the affected territory to adjacent fire protection/EMS public agencies. While this modification has consent of the subject agencies, the County's 2016 CEQA determination does not adequately cover the additional annexations and conforming sphere actions associated with the currently proposed reorganization. Accordingly, it is recommended LAFCO assume the lead agency role and make the following two distinct findings pursuant to CEQA.

- The sphere of influence amendments qualify as a project under CEQA, but are exempt from further review under State CEQA Guidelines Section 15061(b)(3). This exemption appropriately applies given it can be seen with certainty spheres of influence are planning policies and any amendments do not make any changes to the environment or authorize any new uses or services.
- The reorganization qualifies as a project under CEQA, but is exempt from further review under State CEQA Section 15061(b)(3). This exemption appropriately applies given it can be seen with a certainty the proposal will not have an adverse effect on the environment given the underlying action is to formalize services already provided informally by the subject agencies through cooperative arrangements.

## Protest Proceedings

An approval of the reorganization by San Diego LAFCO would require protest proceedings under Government Code Section 57000. As allowed under State law and further contemplated under local policy the Executive Officer would be delegated the responsibility to administer the protest proceedings and hold a noticed hearing to accept written objections filed by registered voters and/or landowners within the affected territory. The following thresholds would apply in valuing protests and determining next steps:

- Should less than 25% of (a) registered voters and/or (b) landowners holding less than 25% of the assessed value of land within the affected territory file written protests the reorganization will be ordered without an election.

- Should 25% to 50% of (a) registered voters and/or (b) landowners holding 25% to 50% of the assessed value of land within the affected territory file written protests the reorganization will be ordered subject to an election at a future date.
- Should more than 50% of (a) registered voters and/or (b) landowners holding 50% or more of the assessed value of land within the affected territory file written protests the reorganization will be terminated.

Should the Commission proceed with an approval, staff has tentatively scheduled a protest hearing for the reorganization at 10:00 am on Tuesday, March 12, 2019 in the LAFCO office at 9335 Hazard Way, Suite 200, in San Diego. Notice for the protest hearing would be provided to landowners and registered voters no less than 21-days in advance.<sup>13</sup> Further – and importantly should this apply – all protest forms received by LAFCO would need to be signed on or after the date the protest hearing is noticed; signatures dated ahead of the noticing of the protest hearing are invalid under State law.

## **RECOMMENDATION**

Staff recommends approval of the proposed reorganization and conforming sphere of influence amendments consistent with Alternative One as outlined in the succeeding section. Approval serves as jurisdictional “clean-up” and provides for the orderly establishment of fire protection and EMS responsibilities within three large service islands of unincorporated territory. Elimination of the three unserved islands will fulfill long-term goals of the County’s 2008 plan for regionalization of fire services within the unincorporated area and represents the best and most efficient service option now and going forward. Additional pertinent details underlying the approval recommendation follows.

- Approval would be subject to protest proceedings. This ensures all community members – landowners and/or registered voters – will have the opportunity to directly participate in the decision-making with respect to proceeding with the reorganization if approved by the Commission.
- Terms are recommended. This includes requiring the County initiate a subsequent jurisdictional change with LAFCO to annex a portion of the affected territory tallying 3,274 acres within Islands 2 and 3 to CSA No. 69 for purposes of ensuring consistent ambulance transport coverage within Lakeside FPD.

## **ALTERNATIVES FOR ACTION**

The following alternative actions are available and can be accomplished a single motion:

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<sup>13</sup> Official protest forms for both landowners and voters are available on the LAFCO website with additional instructions.

Alternative One (recommended):

Approve the reorganization and conforming sphere of influence amendments subject to protest proceedings and specified terms through the adoption of the attached draft resolution.

Alternative Two:

Continue the item to either the next regular meeting set for March 4, 2019 or a special meeting at a designated time and place. This option includes providing direction to staff for any additional information as requested.

Alternative Three:

Disapprove the reorganization and associated sphere of influence amendments and direct the Executive Officer to execute a resolution. This option would preclude a similar proposal being presented to the Commission for a period of no less than one year.

**PROCEDURES FOR CONSIDERATION**

This item has been placed on the agenda as part of a noticed public hearing. The following procedures, accordingly, are recommended in the consideration of this item:

- 1) Receive verbal report from staff unless waived;
- 2) Invite comments from the applicant, CSA No. 135 (County Fire Authority);
- 3) Open the hearing and invite audience comments; and
- 4) Close the hearing, discuss item, and consider action on recommendation.

On behalf of staff,



Robert Barry, AICP  
Chief Policy Analyst

Appendices:

- A) Analysis of Sphere of Influence Factors Per Government Code Section 56425
- B) Analysis of Boundary Change Factors Per Government Code Section 56668

Attachments:

- 1) LAFCO Draft Resolution of Approval
- 2) County of San Diego Resolution of Application on behalf of CSA No. 135 to Expand Fire and EMS LP for the Affected Territory
- 3) County of San Diego Resolution Approving a Negotiated Property Tax Exchange
- 4) Listing of all Affected APNs in Affected Territory

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## APPENDIX A

### Government Code Section 56425 Sphere of Influence Statements

#### 1) The present and planned land uses, including agricultural and open-space lands.

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The affected territory totals approximately 20,861.38 acres or 32.6 square miles of unincorporated territory respectively located within or adjacent to the unincorporated communities of Lakeside and Ramona (Island 2); Crest/Dehesa, Lakeside, and Alpine (Island 3); and Bonita and Spring Valley (Island 4). The affected territory is entirely unincorporated, and as such all present and planned land uses are subject to the adopted policies of the County of San Diego. Development within the affected territory is guided by the associated community plans, which establish local development standards and identify zoning designations within the respective unincorporated communities. Predominant land uses include rural/semi-rural residential and open space; there are no agricultural land uses. LAFCO estimates the total resident population within the affected territory is 392.

#### (2) The present and probable need for public facilities and services in the area.

---

Existing and planned uses within the affected territory as described above merits organized fire protection and EMS. This need is amplified by the present unserved status of the affected territory and highlighted by an existing residential population of 392 as well as serving as a front-line defense to the wildland interface along the eastern perimeter. No new development is associated with the proposed sphere amendments and reorganization of the affected territory with the five subject agencies: Bonita-Sunnyside FPD; Lakeside FPD; San Miguel Consolidated FPD; Ramona MWD; and CSA No. 135. Elimination of three unserved islands will allow the subject agencies to include the respective annexation/expansion territory within their long-range planning documents to address any probable future needs for local facilities and services in step with the County General Plan.

#### (3) The present capacity of public facilities and adequacy of public services the agency provides or is authorized to provide.

---

The five subject agencies are each authorized and presently provide structural fire protection services and EMS services within their respective jurisdictional boundaries. Bonita-Sunnyside FPD, Lakeside FPD, and San Miguel Consolidated FPD each provide services directly from their owned and operated fire stations. Ramona MWD and CSA No. 135 each provide services via contract with CALFIRE. The spheres of influence for the subject agencies were most recently reviewed between 2014-2017. LAFCO determined the capacities of facilities and provision of services were adequate and the subject agencies' respective spheres were affirmed. Review of recent adopted budgets and audited financial statements affirm sufficient resources exist for the subject agencies to efficiently extend fire protection

and EMS services to the affected territory without impacting existing service levels or requiring additional facilities.

**(4) The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.**

---

The underlying rationale to the proposed sphere of influence amendments to divide the affected territory proportionally between the five subject agencies in conjunction with the associated reorganization is based on proximity of available resources. Proceeding with the sphere amendments, accordingly, serves to establish economies of scale in the delivery of fire protection and EMS and the related community interests therein between the agencies and the lands in support of existing and planned uses going forward.

**(5) The present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.**

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The affected territory was reviewed in 2017 for identification and mapping of all qualifying disadvantaged unincorporated communities within or adjacent to the sphere of influence of the subject agencies. No part of the affected territory was identified as containing a disadvantaged unincorporated community. All identified disadvantaged unincorporated communities within the respective subject agencies' spheres will be evaluated regarding their present and probable service and facility needs as part of the next scheduled 5-year service and sphere review cycle commencing in FY2017-2018.

## APPENDIX B

### Government Code Section 56668 Boundary Change Factors

- a) **Population and population density; land area and land use; per capita assessed valuation; topography, natural boundaries, and drainage basins; proximity to other populated areas; the likelihood of significant growth in the area, and in adjacent areas, during the next 10 years.**
- 

The affected territory totals approximately 20,861.38 acres or 32.6 square miles of unincorporated territory respectively located within or adjacent to the unincorporated communities of Lakeside (Island 2), Crest/Alpine (Island 3), and Bonita (Island 4). Total assessed value (land and structures) within the affected territory is \$85.8 million as of July 2018. Populated areas in proximity to the affected territory also include the Cities of Chula Vista, El Cajon, National City, Poway, Santee, and San Diego. The total estimated resident population within the affected territory is 392, including 280 in Island 2; 109 in Island 3; and 3 in Island 4. The predominate land use within the affected territory is open space with limited rural/semi-rural residential uses. Existing County land use policies contemplate no significant new growth within or adjacent to the affected territory within the next 10 years. The topography of the affected territory varies, with Island 2 located in the foothills surrounding SR-67 below Ramona, Island 3 located in higher elevations along I-8 towards the Alpine area and eastern mountains, and Island 4 located adjacent to the Sweetwater Reservoir and the Sweetwater River Valley in Bonita.

- b) **The need for municipal services; the present cost and adequacy of municipal services and controls in the area; probable future needs for those services and controls; probable effect of the proposed incorporation, formation, annexation, or exclusion and of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas.**
- 

The County of San Diego is the primary purveyor of general governmental services to the affected territory, including community planning, roads, street lighting, and law enforcement. There are also a number of smaller local governmental agencies that provide services to the affected territory. The affected territory lies respectively within the jurisdictional boundaries of the following local agencies directly subject to San Diego LAFCO.

- County Service Area No. 26 (Rancho San Diego)
- County Service Area No. 126 (San Miguel Park)
- Pomerado Cemetery District
- Ramona Cemetery District
- Resource Conservation District of Greater San Diego County
- San Diego County Flood Control District

- San Diego County Street Lighting District
- San Diego County Sanitation District
- Grossmont Healthcare District
- Palomar Health Healthcare District
- Otay Water District
- Padre Dam MWD
- South Bay Irrigation District
- San Diego County Water Authority
- Metropolitan Water District of Southern California

None of the above agencies will be affected by the proposed reorganization as the associated jurisdictional changes involve only fire protection and emergency medical services and are the focus of the succeeding analysis.

- **Baseline |**

- **Unserved Status**

- The affected territory is not presently located within the jurisdictional boundary of an authorized structural fire protection or emergency medical service provider. As such, and while remaining officially unserved, all calls for needed services are provided by the surrounding public agencies through local and regional mutual/automatic aid agreements. Actual service demands specific to the affected territory are not readily tracked, but are assumed with input from the subject agencies to collectively average less than 100 per year with specific amounts for each of the three islands as follows.

- Overall recent serve demands within Island 2 are estimated to average 60 per year or less than 1 per day.
    - Overall recent serve demands within Island 3 are estimated to average 30 per year or less than 1 per day.
    - Overall recent serve demands within Island 4 are estimated to average 10 per year or less than 1 per day.

- **Reorganization |**

- **Subject Agencies as Service Provider**

- Should the Commission approve the reorganization proposal the five subject agencies Bonita-Sunnyside FPD, Lakeside FPD, San Miguel Consolidated FPD, Ramona MWD, and County Fire Authority through CSA No. 135 would proportionally assume fire protection and EMS services for the affected territory. All of the subject agencies have provided consent to the proposed reorganization and annexation of the respective affected territory. The following is a summary of the service capacities and levels for each of the five subject agencies –

- **Bonita-Sunnyside FPD** currently averages 1,700 calls annually or 5 daily. The new demand on Bonita-Sunnyside FPD in assuming fire protection and EMS in annexing the proposed 274 acres in Island 4 is expected to represent less than 1% of its current overall demand.
- **Lakeside FPD** currently averages 9,000 calls annually or 25 daily. The new demand on Lakeside FPD in assuming fire protection and EMS in annexing the proposed 3,274 acres in Islands 2 and 3 is expected to represent less than 1% of its current overall demand.
- **San Miguel Consolidated FPD** currently averages 12,000 calls annually or 33 daily. The new demand on San Miguel Consolidated FPD in assuming fire protection and EMS in annexing the proposed 694 acres in Island 3 and 4 is expected to represent less than 1% of its current overall demand.
- **Ramona MWD** currently averages 3,700 calls annually or 10 daily. The new demand on Ramona MWD in assuming fire protection and EMS in annexing the proposed 17 acres in Island 2 is expected to represent less than 1% of its current overall demand.
- **CSA No. 135** currently averages 5,567 calls annually or 15 daily. The new demand on CSA No. 135 in assuming fire protection and EMS in annexing the proposed 16,602 acres in Islands 2, 3, and 4 is expected to represent less than 1% of its current overall demand.

**d) The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on local governmental structure.**

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Approval of the reorganization proposal would have a substantive and positive impact on the local governmental structure of the affected territory. The underlying jurisdictional changes would eliminate three large unserved islands and extend fire protection and EMS services at levels consistent with the adjacent areas. Alternatively, denial of the proposed reorganization would continue the unserved status of the affected territory and perpetuate the negative effects of inefficient and inconsistent service delivery to the affected territory.

**e) The conformity of the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies/priorities set forth in G.C. Section 56377.**

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The proposed reorganization involves the elimination of three islands of unserved territory totaling approximately 20,861 acres. The affected territory is predominately designated for open space land uses and includes limited rural/semi-rural residential uses. No new development or changes in land uses are associated with the proposal. Approval of the proposed reorganization would extend fire protection and EMS services to the presently

unserved affected territory at levels consistent with the subject agencies' adjacent service areas. Establishment of fire protection and EMS services within the affected territory is therefore anticipated to conform with the Commission's adopted policies on providing planned, orderly, and efficient patterns of urban growth and the policies of Government Code Section 56377.

**f) The effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by G.C. Section 56016.**

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No portion of the affected territory qualify as agricultural lands under LAFCO law. Accordingly, approval of the reorganization proposal is not expected to have an effect on maintaining the physical or economic integrity of agricultural lands.

**g) The definiteness and certainty of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment, the creation of islands or corridors of unincorporated territory, and other similar matters.**

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The boundary of the affected territory is certain and known with surveyed metes and bounds on file with LAFCO. Approval would be termed on the processing of the submitted maps and geographic descriptions of the affected territory and its distinct parts consistent with the requirements of the State Board of Equalization for both the (a) annexations to the Bonita-Sunnyside FPD, Lakeside FPD, San Miguel Consolidated FPD, and Ramona MWD, respectively and (b) expansion of the latent power fire protection and EMS services area of CSA No. 135.

**h) Consistency with the city or county general plans, specific plans, and adopted regional transportation plan.**

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The affected territory is entirely unincorporated and subject to the land use policies of the County of San Diego General Plan. The County's implementing land use policy documents for the affected territory are divided between the community plans for Lakeside (Island 2), Crest/Alpine (Island 3), and Bonita/Spring Valley (Island 4). The County's planning documents contemplate the role and need for organized fire protection and emergency medical services to support current and planned development. Approval of the proposed reorganization would eliminate three large unserved islands and therefore be consistent with the County General Plan. The proposal does not conflict with San Diego Forward, the regional transportation plan prepared and adopted by SANDAG.

**i) The sphere of influence of any local agency affected by the proposal.**

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As detailed in the accompanying agenda report, the reorganization proposal would necessitate five concurrent sphere of influence amendments. The first four actions involve amending the spheres of influence for the Bonita-Sunnyside FPD, Lakeside FPD, and San Miguel Consolidated FPD, and Ramona MWD to include their respective annexation

territory. The fifth action involves amending and expanding CSA No. 135's service-specific sphere for fire protection and EMS to include the remainder of the affected territory. Approval of the amendments will provide consistency with subject agencies' spheres and the proposed reorganization's jurisdictional changes. Approval would result in all of the affected territory being located within the sphere and jurisdictional boundaries of existing fire protection and EMS service providers and is warranted.

**j) The comments of any affected local agency or other public agency.**

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CSA No. 135 through the County of San Diego serves as the applicant and adopted a resolution of application to initiate the reorganization at a noticed public hearing on February 2, 2016. The other four subject agencies have consented to the reorganization. No other public agencies have provided comments on the proposal as of the agenda report publication.

**k) The ability of the newly formed or receiving entity to provide the services which are the subject of the application to the area, including the sufficiency of revenues for those services following the proposed boundary change.**

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Information collected and reviewed as part of this proposal indicates all five receiving entities – Bonita-Sunnyside FPD, Lakeside FPD, San Miguel Consolidated FPD, Ramona FPD, and CSA No. 135 – appear to have established sufficient financial resources and administrative controls therein relative to providing proportional fire protection and EMS to the affected territory without impacting constituents. Supporting details follow.

- Bonita-Sunnyside FPD  
The last audit covers 2016-2017 and shows Bonita-Sunnyside FPD finished with high and positive liquidity levels with an agency-wide current ratio of 152.2 (i.e., \$152.20 in current assets for every \$1.00 in current liabilities). It also finished with sufficient capital levels as evident by a moderate debt ratio of 63.4% (i.e., \$63.40 out of every \$100.00 in net assets are financed.) This measurement further improves to 9.5% less pension obligations. The total margin also finished in positive territory at 9.2%.
- Lakeside FPD  
The last audit covers 2016-2017 and shows Lakeside FPD finished with modest but positive liquidity levels with an agency-wide current ratio of 4.5 (i.e., \$4.50 in current assets for every \$1.00 in current liabilities). Capital levels finished low as evident by a debt ratio of 132.8% (i.e., \$132.80 out of every \$100.00 in net assets are financed.) This measurement – however – significantly improves and lowers to 34.2% less pension obligations. The total margin finished in positive territory at 5.9%.

- San Miguel Consolidated FPD  
The last audit covers 2017-2018 and shows San Miguel Consolidated FPD finished with modest but positive liquidity levels with an agency-wide current ratio of 3.6 (i.e., \$3.60 in current assets for every \$1.00 in current liabilities). Capital levels finished low as evident by a high debt ratio of 132.8% (i.e., \$132.80 out of every \$100.00 in net assets are financed.) This measurement – however – significantly improves and lowers to 26.6% less pension obligations. The total margin finished in positive territory at 4.5%.
- Ramona MWD  
The last audit covers 2017-2018 and shows Ramona MWD finished with moderate and positive liquidity levels with an agency-wide current ratio of 6.6 (i.e., \$6.60 in current assets for every \$1.00 in current liabilities). Capital levels finished high as evident by a low debt ratio of 19.5% (i.e., \$19.50 out of every \$100.00 in net assets are financed.) This measurement further improves and lowers to 10.7% less pension obligations. The total margin finished in positive territory at 5.8%.
- CSA No. 135 | County of San Diego  
The last audit covers 2017-2018 and shows the County of San Diego – as the parent agency to CSA No. 135 – finished with moderate and positive liquidity levels with an agency-wide current ratio of 7.3 (i.e., \$7.30 in current assets for every \$1.00 in current liabilities). It also finished with sufficient capital levels as evident by a moderate debt ratio 68.7% (i.e., \$68.70 out of every \$100.00 in net assets are financed.) This measurement further improves and lowers to 33.0% less pension obligations. The total margin finished in positive territory at 4.1%.

**I) Timely availability of adequate water supplies for projected needs as specified in G.C. Section 65352.5.**

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The majority of the affected territory already lies within and receives domestic water service from several special districts. Approval of the reorganization proposal is specific to eliminating three large islands of unserved territory by extending fire protection and EMS services through annexations and latent powers expansions among the subject agencies. The proposed reorganization does not involve new development or changes to existing land uses and is not expected to affect the timely availability of supplies in the affected territory.

**m) The extent to which the proposal will affect a city or cities and the county in achieving their respective fair shares of the regional housing needs as determined by the appropriate council of governments.**

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The reorganization proposal does not impact any local agencies in accommodating their regional housing needs. All potential residential units associated with the affected territory are already assigned to the County of San Diego. This assignment would not change as a result of proposal being approved.



**n) Any information or comments from the landowner or owners, voters, or residents of the affected territory.**

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LAFCO has not received written comments from residents (landowners and/or voters) within the affected territory regarding the reorganization proposal. Any comments received following publication of this report would be transmitted to the Commission at the February 4, 2019 meeting.

**o) Any information relating to existing land use designations.**

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The existing County of San Diego General Plan land use designations for the affected territory is predominately open space with limited rural/semi-rural residential uses. The proposed reorganization does not involve new development or changes to the existing land uses within the affected territory.

**p) The extent to which the proposal will promote environmental justice.**

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As used in this review factor, "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services. The proposed reorganization involves the establishment of service responsibilities for fire protection and emergency medical services within three large islands of unserved territory and does not include locating new public facilities. The affected territory contains a total of 392 residents that are not currently located within the jurisdictional boundary of a public fire protection and emergency medical services provider. Therefore, approval of the proposed reorganization would promote environmental justice within the affected territory by extending adequate levels of needed public services to presently unserved rural-residential areas.

**q) Any relevant information contained in a local hazard mitigation plan, a safety element of a general plan, and/or maps that identify land as a very high fire hazard zone or a state responsibility area**

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The affected territory includes three distinct unserved island areas that are proposed for inclusion within five subject agencies: Bonita-Sunnyside FPD; Lakeside FPD; San Miguel Consolidated FPD; Ramona MWD; and CSA No. 135. As of August 2012, the affected territory is identified on State maps as located within very high fire hazard zones and state responsibility areas. The affected territory is entirely unincorporated and subject to the safety element of the County of San Diego General Plan. The County of San Diego adopted a multi-jurisdictional hazard mitigation plan for the San Diego Region in 2017.

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**RESOLUTION OF THE SAN DIEGO COUNTY LOCAL AGENCY FORMATION COMMISSION**

**APPROVING A REORGANIZATION AND  
ASSOCIATED SPHERE OF INFLUENCE AMENDMENTS**

**CONCURRENT ANNEXATIONS TO BONITA-SUNNYSIDE FIRE PROTECTION DISTRICT, LAKESIDE  
FIRE PROTECTION DISTRICT, SAN MIGUEL CONSOLIDATED FIRE PROTECTION DISTRICT, AND  
RAMONA MUNICIPAL WATER DISTRICT, AND EXPANSION OF CSA NO. 135'S FIRE PROTECTION AND  
EMERGENCY MEDICAL SERVICES LATENT POWER AREA  
(RO16-20 ET AL.)**

**WHEREAS**, the County of San Diego (County), acting on behalf of Community Service Area No. 135 (CSA No 135), filed a resolution of application with the San Diego County Local Agency Formation Commission (Commission) pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000; and

**WHEREAS**, the County's application requests approval for expansion of CSA No. 135's latent power area for fire protection and emergency medical services to include the majority of the approximate 20,861.4 acres comprising the affected territory, and concurrent annexations of remaining portions of the affected territory among four agencies including Bonita-Sunnyside Fire Protection District, Lakeside Fire Protection District, San Miguel Consolidated Fire Protection District, and Ramona Municipal Water District, and concurrent sphere of influence amendments to include the designated portions of the affected territory; and

**WHEREAS**, the County represents it consulted with the subject agencies and all consent to their respective jurisdictional change and have the financial resources to assume and provide proportional fire protection and emergency medical services in support of existing and planned land uses within the affected territory; and

**WHEREAS**, the application filing by the County is processed by the Commission as a reorganization proposal and is referred to as the "CSA No. 135 Islands 2, 3, & 4 Reorganization"; and

**WHEREAS**, on January 29, 2019, the County of San Diego, approved a negotiated property tax exchange covering the affected territory and agencies in the CSA No. 135 Islands 2, 3, & 4 Reorganization; and

**WHEREAS**, the Commission's Executive Officer has reviewed the CSA No. 135 Islands 2, 3, & 4 Reorganization proposal and prepared a report with recommendations; and

**WHEREAS**, the Executive Officer's report and recommendations on the CSA No. 135 Islands 2, 3, & 4 Reorganization proposal and need for concurrent sphere of influence amendments have been presented to the Commission in the manner provided by law; and

**WHEREAS**, the Commission heard and fully considered all the evidence presented at a noticed public hearing along with reviewing the necessary concurrent sphere of influence amendments for consistency under Government Code Section 56375.5 on February 4, 2019.

**NOW, THEREFORE, BE IT RESOLVED**, the Commission hereby finds, determines, and orders the following:

1. The hearing was held on the date set therefore, and due notice of said hearing was given in the manner required by law.
2. At the hearing, the Commission called for, heard, and considered all interested parties and public comments and read and considered the Executive Officer's report.
3. The Commission serves as lead agency under the California Environmental Quality Act (CEQA) in considering two distinct "projects" associated with the CSA No. 135 Islands 2, 3, & 4 Reorganization proposal and as detailed in the Executive Officer's report: (a) accommodating sphere of influence amendments and the (b) reorganization itself. The Commission's findings follow.
  - a) The sphere of influence amendments qualify as a project under CEQA, but are exempt from further review under State CEQA Guidelines Section 15061(b)(3). This exemption appropriately applies given it can be seen with certainty spheres of influence are planning policies and any amendments do not make any changes to the environment or authorize any new uses or services.
  - b) The reorganization qualifies as a project under CEQA, but is exempt from further review under State CEQA Section 15061(b)(3). This exemption appropriately applies given it can be seen with a certainty the proposal will not have an adverse effect on the environment given the underlying action is to formalize services already provided informally by the subject agencies through cooperative arrangements.
4. The Commission conditionally APPROVES the following sphere of influence amendments.
  - a) The service-specific sphere of influence for CSA No. 135 (Fire/EMS), Bonita-Sunnyside Fire Protection District, Lakeside Fire Protection District, San Miguel Consolidated Fire Protection District, and Ramona Municipal Water District amended to expand their authority to provide fire protection and emergency medical services to the territory shown in Exhibit A.
5. The Commission conditions the approved sphere of influence amendments as described on the recordation of the associated CSA No. 135 Islands 2, 3, & 4 Reorganization identified as RO16-20 et al.
6. The written statements of the Commission addressing the mandatory factors required for consideration any time spheres of influence are adopted, amended, or updated under Government Code Section 56425 are provided as Exhibit B.
7. The Commission conditionally APPROVES the proposed CSA No. 135 Islands Reorganization proposal identified as RO16-20 et al. without modification or amendment and as shown in Exhibit A.

- a. The following conditions must be satisfied within one calendar year – or February 4, 2020 – unless prior written request for an extension is received and approved by the Commission.
  - i. Completion of the 30-day reconsideration period provided under Government Code Section 56895.
  - ii. Receipt and confirmation by the County of San Diego Assessor’s Office of the completeness of maps and geographic descriptions of the affected territory showing the (a) annexation to the five agencies and (b) service expansion of the five agencies.
  - iii. Payment of any outstanding fees pursuant to the adopted LAFCO Fee Schedule.
- b. The following conditions apply upon and after the effective date of the CSA No. 135 Islands 2, 3, & 4 Reorganization as defined in No. 11 below:
  - i. Tax Revenues. Upon the effective date, all property tax revenues and voter-approved special tax or special assessment revenues (if any), received or receivable shall be shared in accordance with the negotiated property tax exchange agreement resolution approved by the County Board of Supervisors at their January 29, 2019 meeting.
  - c. CSA No. 135 shall initiate a proposal for a sphere of influence amendment and annexation to CSA No. 69 (Heartland Paramedics) for the portions of the affected territory annexed to Lakeside FPD. Satisfaction of this condition requires the proposal be filed with the Commission and issuance of a Certificate of Filing by the Executive Officer.
8. The population in the affected territory is approximately 392 and, thus, the affected territory is inhabited as defined in Government Code Section 56046.
9. The Commission delegates to the Executive Officer performing all conducting authority proceeding requirements under Government Code Section 57000.
10. CSA No. 135, Bonita-Sunnyside Fire Protection District, Lakeside Fire Protection District, San Miguel Consolidated Fire Protection District, and Ramona Municipal Water District utilize the regular assessment roll of the County of San Diego.
11. The effective date of the CSA No. 135 Islands 2, 3, & 4 Reorganization proposal shall be the date of recordation of the Certificate of Completion.
12. As allowed under Government Code 56107, the Commission authorizes the Executive Officer to make non-substantive corrections to this resolution to address any technical defect, error, irregularity, or omission.

PASSED AND ADOPTED by the San Diego County Local Agency Formation Commission on February 4, 2019 by the following vote:

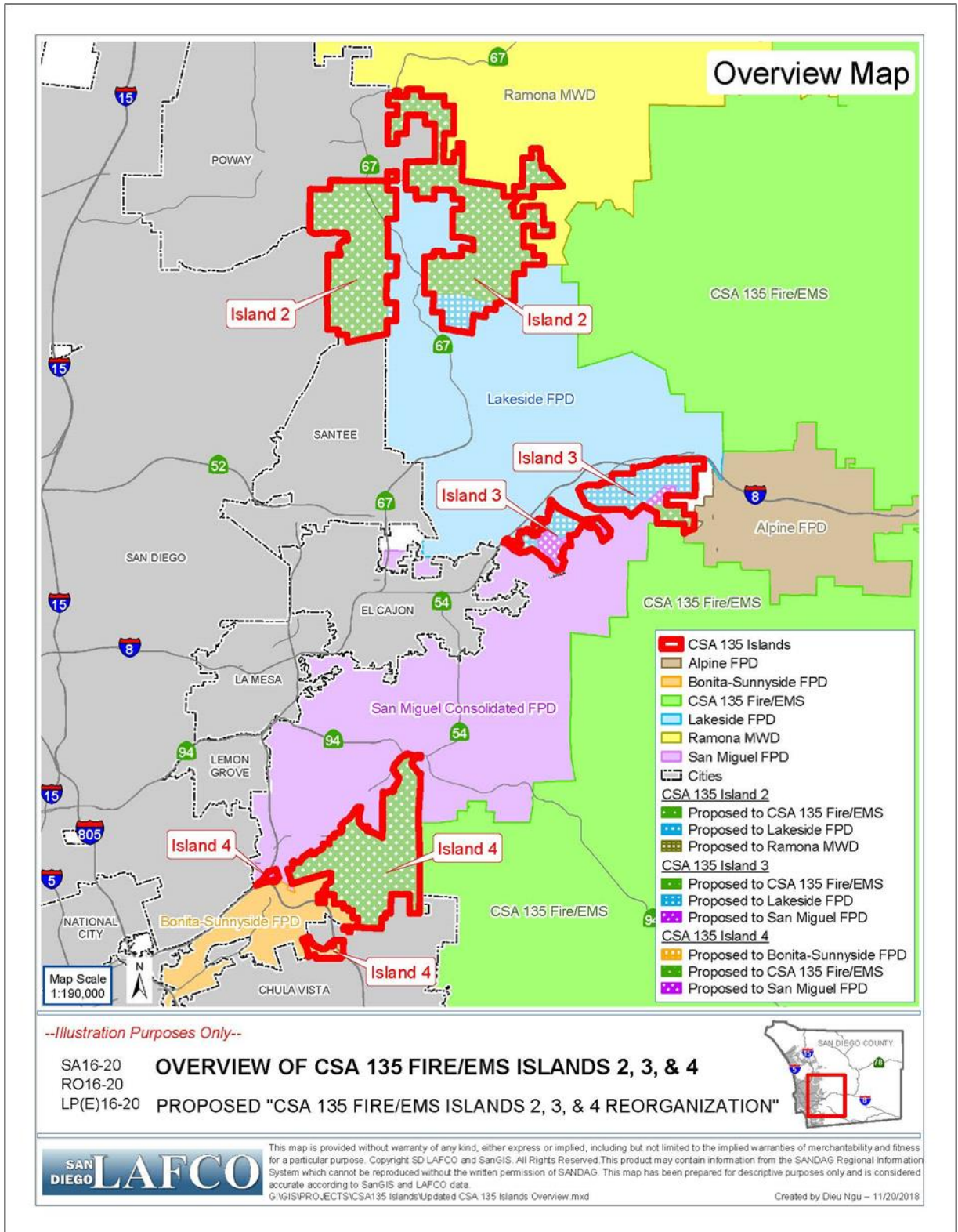
AYES:

NOES:

ABSENT:

ABSTAINING:

EXHIBIT A



## EXHIBIT B

### Government Code Section 56425 Sphere of Influence Statements

#### **1) The present and planned land uses, including agricultural and open-space lands.**

---

The affected territory totals approximately 20,861.38 acres or 32.6 square miles of unincorporated territory respectively located within or adjacent to the unincorporated communities of Lakeside and Ramona (Island 2); Crest/Dehesa, Lakeside, and Alpine (Island 3); and Bonita and Spring Valley (Island 4). The affected territory is entirely unincorporated, and as such all present and planned land uses are subject to the adopted policies of the County of San Diego. Development within the affected territory is guided by the associated community plans, which establish local development standards and identify zoning designations within the respective unincorporated communities. Predominant land uses include rural/semi-rural residential and open space; there are no agricultural land uses. LAFCO estimates the total resident population within the affected territory is 392.

#### **(2) The present and probable need for public facilities and services in the area.**

---

Existing and planned uses within the affected territory as described above merits organized fire protection and EMS. This need is amplified by the present unserved status of the affected territory and highlighted by an existing residential population of 392 as well as serving as a front-line defense to the wildland interface along the eastern perimeter. No new development is associated with the proposed sphere amendments and reorganization of the affected territory with the five subject agencies: Bonita-Sunnyside FPD; Lakeside FPD; San Miguel Consolidated FPD; Ramona MWD; and CSA No. 135. Elimination of three unserved islands will allow the subject agencies to include the respective annexation/expansion territory within their long-range planning documents to address any probable future needs for local facilities and services in step with the County General Plan.

#### **(3) The present capacity of public facilities and adequacy of public services the agency provides or is authorized to provide.**

---

The five subject agencies are each authorized and presently provide structural fire protection services and EMS services within their respective jurisdictional boundaries. Bonita-Sunnyside FPD, Lakeside FPD, and San Miguel Consolidated FPD each provide services directly from their owned and operated fire stations. Ramona MWD and CSA No. 135 each provide services via contract with CALFIRE. The spheres of influence for the subject agencies were most recently reviewed between 2014-2017. LAFCO determined the capacities of facilities and provision of services were adequate and the subject agencies' respective spheres were affirmed. Review of recent adopted budgets and audited



financial statements affirm sufficient resources exist for the subject agencies to efficiently extend fire protection and EMS services to the affected territory without impacting existing service levels or requiring additional facilities.

**(4) The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.**

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The underlying rationale to the proposed sphere of influence amendments to divide the affected territory proportionally between the five subject agencies in conjunction with the associated reorganization is based on proximity of available resources. Proceeding with the sphere amendments, accordingly, serves to establish economies of scale in the delivery of fire protection and EMS and the related community interests therein between the agencies and the lands in support of existing and planned uses going forward.

**(5) The present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.**

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The affected territory was reviewed in 2017 for identification and mapping of all qualifying disadvantaged unincorporated communities within or adjacent to the sphere of influence of the subject agencies. No part of the affected territory was identified as containing a disadvantaged unincorporated community. All identified disadvantaged unincorporated communities within the respective subject agencies' spheres will be evaluated regarding their present and probable service and facility needs as part of the next scheduled 5-year service and sphere review cycle commencing in FY2017-2018.

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RESOLUTION OF APPLICATION TO AMEND THE SPHERE OF INFLUENCE OF THE FIRE PROTECTION AND EMERGENCY MEDICAL SERVICE SUBAREA OF COUNTY SERVICE AREA NO. 135 AND EXPAND THE AREA WITHIN CSA 135 WHERE THE LATENT POWERS OF FIRE PROTECTION AND EMERGENCY SERVICES ARE EXERCISED PER AUTHORIZATION BY THE SAN DIEGO LOCAL AGENCY FORMATION COMMISSION (LAFCO), INTO THE TERRITORY KNOWN AS UNINCORPORATED SERVICE ISLANDS NOS. 2, 3, AND 4

WHEREAS, the Board of Supervisors of the County of San Diego desires that, pursuant to the provisions of the Cortese/Knox/Hertzberg Local Government Reorganization Act of 2000, Division 3, commencing with Section 56000 of the California Government Code to request the San Diego LAFCO to amend the sphere of influence and expand the latent powers area (fire protection and emergency medical services) of CSA No. 135 to include the territory of unincorporated service islands nos. 2, 3, and 4 depicted in Exhibit A; and

WHEREAS, the latent powers of CSA No. 135 to provide fire protection and emergency medical service have been exercised since 2008, as authorized by LAFCO, for a geographically limited area within the boundaries of the CSA ("latent powers subarea"); and

WHEREAS the Board of Supervisors desires that the latent powers subarea of CSA No. 135 for fire protection and emergency medical services be expanded to include the territory of unincorporated service islands nos. 2, 3 and 4; and

WHEREAS the Board of Supervisors has prepared a Plan for Services attached as Exhibit "C" and scheduled and conducted a public hearing on this Resolution of Application pursuant to Government Code Section 56824.12(a-c); and

WHEREAS the respective SB 239 thresholds for triggering LAFCO review for any associated fire protection contract(s) have not been met because the responsibility for providing services within unincorporated services island Nos. 2, 3, and 4 does not represent more than 25 percent of the area within the jurisdictional boundaries of any public agency affected by any contract or agreement, and said fire protection contract(s) will not change the employment status of more than 25 percent of the employees of any public agency affected by the contract(s) or agreement(s); and

WHEREAS, the reasons for the proposed sphere of influence and latent powers area expansion are as follows:

1. Ensure fire protection and emergency medical service for the territory of the unincorporated service islands nos. 2, 3 and 4;

WHEREAS, the boundaries of the affected territories are depicted in Exhibit "A"; and

WHEREAS, the plan for services prepared pursuant to Government Code Section 56824.10 to 56824.14 for the affected territory is set forth in the LAFCO application attached as Exhibit "B"; and

WHEREAS, pursuant to Section 15061(b)(3) of the California Environmental Quality Act (CEQA) Guidelines, the proposed sphere of influence amendment and expansion of the fire protection and emergency medical services latent powers area of CSA No. 135 are categorically exempt from CEQA

Resolution No. 16-012  
Meeting Date: 02/02/16 (01)

review because it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment; and

WHEREAS, all other legal requirements associated with the adoption of this Resolution have been met;

NOW, THEREFORE, IT IS HEREBY RESOLVED THAT, pursuant to Government Code sections 56428 and 25210.2, subdivision (g), application is hereby made to the Local Agency Formation Commission to:

1. Expand the sphere of influence and latent power area for fire protection and emergency medical services within CSA No. 135 subarea to include the unincorporated service islands nos. 2, 3 and 4.

IT IS FURTHER RESOLVED THAT:

1. The above recitals are true and correct.
2. The Deputy Chief Administrative Officer of the Public Safety Group, or designee, is hereby authorized and directed to file a certified copy of this Resolution with the Executive Officer of the Local Agency Formation Commission (LAFCO); and
3. The Deputy Chief Administrative Officer of the Public Safety Group, or designee, is hereby authorized and directed to prepare the necessary LAFCO Application documents, conduct investigations, and take any action necessary to process the application.

APPROVED AS TO FORM AND LEGALITY  
COUNTY COUNSEL

By \_\_\_\_\_  
Shiri Hoffman  
Senior Deputy County Counsel

Resolution No. 16-012  
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ON MOTION of Supervisor Horn, seconded by Supervisor Cox, the above Resolution was passed and adopted by the Board of Supervisors, County of San Diego, State of California, on this 2<sup>nd</sup> day of February, 2016, by the following vote:

AYES: Cox, Jacob, D. Roberts, R. Roberts, Horn

- - -

STATE OF CALIFORNIA)  
County of San Diego)<sup>SS</sup>

I hereby certify that the foregoing is a full, true and correct copy of the Original Resolution entered in the Minutes of the Board of Supervisors.

DAVID HALL  
Clerk of the Board of Supervisors

By: D. Lopez  
Diana Lopez, Deputy



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**RESOLUTION REGARDING NEGOTIATED PROPERTY TAX EXCHANGE  
RELATIVE TO JURISDICTIONAL CHANGES**

WHEREAS, Revenue and Taxation Code Section 99 requires the negotiation of any exchange of property tax revenues occasioned by jurisdictional changes between the areas affected; and

WHEREAS, under such circumstances the Board of Supervisors is authorized to negotiate such property tax revenue exchanges on behalf of service areas or special districts; and

WHEREAS, the jurisdictional changes shown on the attached maps between the County, City and Special Districts are proposed; and

WHEREAS, the Board of Supervisors has determined, that pursuant to Section 15378(b)(4) of the State CEQA Guidelines, this property tax exchange is not subject to the environmental impact evaluation process because the proposed action involves fiscal activities which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment; and

WHEREAS, the Board of Supervisors has negotiated with the affected Cities and Special Districts to determine an equitable exchange of property tax revenues applicable to such jurisdictional exchange; NOW THEREFORE

IT IS RESOLVED AND ORDERED that the Clerk of the Board of Supervisors shall, on behalf of the adopting agencies, notify the County Auditor and the San Diego Local Agency Formation Commission (LACFO) of such negotiated exchange of property tax revenues by forwarding to them a copy of this Resolution.

CCSF, 30.01, 8/84

NEGOTIATION OF PROPERTY TAX EXCHANGE  
 ALLOCATION OF ANNUAL TAX INCREMENT (ATI)

Proposal

Property Tax Exchange Resolution: CSA 135 Reorganization (Alpine Fire Protection District Annexation): DA-16-15; SA16-15.

Basis for Exchange:

- A. If the proposal is approved as submitted by LAFCO, the following table shows the exchange of annual tax increment (ATI) being transferred. In addition to the ATI, base revenue shall be transferred to the annexing agencies proportionate to the transfer of ATI:

<b>Areas A-E</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.13425528	0.10324432
CSA 135 Fire Protection & EMS	0.01898904	0.00000000
CSA 135 Regional Radio	0.00000000	0.00000000
CSA 135 Regional Radio Zone J	0.00000000	0.00000000
Alpine Fire Protection District	0.00000000	0.05000000
All Other Taxing Agencies	0.84675568	0.84675568
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

<b>Area F</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.13723403	0.08723403
CSA 135 Fire Protection & EMS	0.00000000	0.00000000
CSA 135 Regional Radio	0.00000000	0.00000000
CSA 135 Regional Radio Zone J	0.00000000	0.00000000
Alpine Fire Protection District	0.00000000	0.05000000
All Other Taxing Agencies	0.86276597	0.86276597
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

- B. If the proposal is not processed as submitted by LAFCO, no property tax exchange shall occur



NEGOTIATION OF PROPERTY TAX EXCHANGE  
 ALLOCATION OF ANNUAL TAX INCREMENT (ATI)

Proposal

Property Tax Exchange Resolution: CSA 135 Reorganization (Islands 2, 3, and 4): SA-16-20(a-e); RO 16-20; LP(E)16-20).

Basis for Exchange:

- A. If the proposal is approved as submitted by LAFCO, the following table shows the exchange of annual tax increment (ATI) being transferred. In addition to the ATI, base revenue shall be transferred to the annexing agencies proportionate to the transfer of ATI:

<b>Island 2</b>		
<b>Areas A &amp; B – Annex to Ramona MWD</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.15977777	0.10977777
Ramona MWD	0.00000000	0.05000000
All Other Taxing Agencies	0.84022223	0.84022223
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

<b>Island 2</b>		
<b>Areas C, D, &amp; E – Annex to Lakeside FPD</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.13778555	0.08778555
Lakeside FPD	0.00000000	0.05000000
All Other Taxing Agencies	0.86221445	0.86221445
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

<b>Island 2</b>		
<b>Areas F, G, &amp; H – Annex to CSA 135 Fire &amp; EMS</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.18363781	0.13363781
CSA No. 135	0.00000000	0.05000000
All Other Taxing Agencies	0.81636219	0.81636219
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

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**ATTACHMENT C**

<b>Island 3</b>		
<b>Areas A &amp; B – Annex to Lakeside FPD</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.13593213	0.08593213
Lakeside FPD	0.00000000	0.05000000
All Other Taxing Agencies	0.86406787	0.86406787
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

<b>Island 3</b>		
<b>Areas C, D, &amp; E – Annex to San Miguel Consolidated FPD</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.13646814	0.08646814
San Miguel Consolidated FPD	0.00000000	0.05000000
All Other Taxing Agencies	0.86353186	0.86353186
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

<b>Island 3</b>		
<b>Area F – Annex to CSA 135 Fire &amp; EMS</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.13962425	0.08962425
CSA No. 135	0.00000000	0.05000000
All Other Taxing Agencies	0.86037575	0.86037575
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

<b>Island 4</b>		
<b>Area A – Annex to San Miguel Consolidated FPD</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.17406270	0.12406270
San Miguel Consolidated FPD	0.00000000	0.05000000
All Other Taxing Agencies	0.82593730	0.82593730
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

<b>Island 4</b>		
<b>Areas B, C, &amp; D – Annex to Bonita-Sunnyside FPD</b>		
Local Agencies	Current ATI	Renegotiated ATI
County General	0.16942750	0.11942750
Bonita-Sunnyside FPD	0.00000000	0.05000000
All Other Taxing Agencies	0.83057250	0.83057250
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

Resolution No. \_\_\_\_\_  
Meeting Date: \_\_\_\_\_

**ATTACHMENT C**

<b>Island 4</b>		
<b>Area E – Annex to CSA 135 Fire &amp; EMS</b>		
<b>Local Agencies</b>	<b>Current ATI</b>	<b>Renegotiated ATI</b>
County General	0.15056687	0.10056687
CSA No. 135	0.00000000	0.05000000
All Other Taxing Agencies	0.84943313	0.84943313
<b>Total</b>	<b>1.00000000</b>	<b>1.00000000</b>

B. If the proposal is not processed as submitted by LAFCO, no property tax exchange shall occur

Approved as to form and legality  
County Counsel

By: Randall Sjoblom, Senior Deputy

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Listing of all Affected APNs within CSA 135 Islands 2, 3, & 4 Reorganization

2782310200	3231105500	3240310100	3250200102	3271401200	3990203900	5060106600	5851600400
2782701600	3231105700	3240400700	3250200103	3271500400	3990204600	5060106700	5851600500
2782703000	3231106200	3240400800	3250200104	3271500500	3990205000	5061400300	5851600600
2782706000	3231106300	3240402500	3250200300	3271500600	3990211300	5800100800	5851600700
2782706100	3231106400	3240402600	3250600100	3271501000	3990211600	5800100900	5851600900
2783911000	3231106800	3240402700	3250600200	3271501300	4010201300	5800104900	5851601100
2783911100	3231106900	3240402800	3250600300	3271501400	4010202500	5800201900	5851601200
2783920100	3231107200	3240403100	3250600400	3290100300	4010202600	5800202300	5851601300
2783920200	3231107300	3240403200	3250600500	3290100400	4010400500	5800202900	5851601400
2783920300	3231110401	3240403300	3250600600	3290100500	4010401000	5800203000	5851601500
2783920400	3231110402	3240403400	3250600700	3290100600	4011920200	5800203200	5851601800
3220200300	3231110403	3240403500	3250600800	3290100700	4011920600	5800203300	5851601900
3220200500	3231110404	3240403600	3250600900	3290100800	4012011000	5802200100	5851602000
3220200600	3240101200	3240404100	3250601000	3290101100	4012020700	5802200200	5851610400
3220200700	3240101600	3240404200	3250601100	3290101400	4012020800	5802200400	5851700200
3220200800	3240102000	3240404300	3250601200	3290101500	4012020900	5802200600	5851700800
3220200900	3240103400	3240404400	3250601300	3290101600	4012021600	5845722300	5851701100
3220201000	3240105400	3240404600	3250601400	3290110100	4012021700	5850300300	5851701200
3220210400	3240105500	3240404700	3250601500	3290110200	4012022900	5850300600	5851701300
3220210500	3240105600	3240404900	3250601600	3290201100	4012023000	5850300700	5851701500
3220300100	3240105800	3240405000	3250601700	3290210300	4012023100	5850300800	5851701800
3220300200	3240105900	3240410300	3250601800	3290210600	4012023200	5850700200	5860502401
3220300901	3240106000	3240600300	3250601900	3290230200	4012023300	5850700300	5860502402
3220300902	3240106100	3240600400	3250602000	3290230300	4012023700	5850800100	5860503400
3220310100	3240106200	3240700100	3250602200	3290400100	4012023800	5850800300	5860601100
3220310200	3240106300	3240700500	3250602300	3290400200	4012111600	5850800500	5860601200
3220500100	3240106400	3240700600	3250602400	3290400400	4012111700	5850800600	5860601300
3220500400	3240106500	3240700700	3250602500	3290410200	4012111800	5850800700	5940810200
3220500500	3240106600	3240700800	3250602600	3290410300	4012111900	5850800800	5940810300
3220500600	3240106700	3240700900	3260210200	3290500100	4012112000	5850800900	5950100600
3220500700	3240106800	3240701000	3260300100	3290500200	4012112100	5851200600	5950101600
3220601100	3240106900	3240701100	3260300200	3290500400	4012112200	5851300200	5950200100
3220601200	3240107000	3240701200	3260300400	3290600100	4012112300	5851300300	5950200300
3220601800	3240107100	3240701300	3260300500	3290800100	4012112400	5851300400	5950200400
3220610200	3240107200	3240701400	3260300600	3290900100	4012112500	5851300500	5950200500
3220610300	3240107300	3240701500	3260501800	3291210300	4012112600	5851300600	5950200600
3230800700	3240107500	3240701600	3260610600	3291210400	4022023800	5851300700	5950200700
3230800900	3240107600	3240701700	3260610700	3740300100	4022023900	5851302500	5950200800
3230801100	3240110600	3240702300	3260611200	3961120100	4022024800	5851302600	5950201000
3230801300	3240110700	3240702400	3260611300	3961203900	4022025200	5851310500	5950201400
3230801500	3240110800	3240702700	3260611400	3961204000	4022025300	5851310600	5950201600
3230801600	3240110900	3240702800	3260611500	3961300200	4022101900	5851310700	5950201700
3231100200	3240111100	3240702900	3260611600	3961300300	4022102000	5851310800	5950201800
3231101600	3240111200	3240703100	3260611700	3961300400	4030104700	5851310900	5950201900
3231102200	3240111300	3240703300	3260700100	3981700800	4030104800	5851400600	5950202000
3231102600	3240111500	3240703600	3260700200	3990100700	4030104900	5851400800	5950203000
3231104400	3240112100	3240703900	3260700300	3990100800	4030105000	5851401100	5950203100
3231104700	3240112200	3240704000	3260700400	3990100900	4030110100	5851401200	5950203800
3231104800	3240112300	3240704100	3271400100	3990101000	4041000900	5851401300	5950203900
3231104900	3240112500	3240704200	3271400400	3990101100	4041001000	5851401600	5950204100
3231105000	3240112700	3240704300	3271400600	3990200400	4041001600	5851401700	5950204200
3231105100	3240210200	3240704800	3271400900	3990202600	5060103500	5851401800	5950204400
3231105200	3240210300	3240704900	3271401000	3990203200	5060105800	5851401900	5950204500
3231105300	3240300300	3250200101	3271401100	3990203500	5060106100	5851402000	5950204600

## Attachment 4: Listing of all Affected APNs within CSA 135 Islands 2, 3, & 4 Reorganization

5950204700  
5950205000  
5950205100  
5950205300  
5950205400  
5950205600  
5950206300  
5950206600  
5950206900  
5950207000  
5950207200  
5950207300  
5950207400  
5950207500  
5950207600  
5950207700  
5950207800  
5950207900  
5950208000  
5950208100  
5950208200  
5950208300  
5950208400  
5950208500  
7601480100  
7601480900  
7601481000  
7601481500