

AGENDA REPORT Business | Discussion + Possible Action

September 15, 2023

TO: Special Districts Advisory Committee

FROM: Carolanne Ieromnimon, Analyst II

Michaela Peters, Analyst I

SUBJECT: Updated Draft Policy Establishment on Out-of-Agency Services

SUMMARY

The Special Districts Advisory Committee ("Committee") will review an updated draft policy to govern outside service approvals for cities and special districts. The updated draft policy has been prepared as part of LAFCO's adopted workplan and responds to growing attention towards out-of-agency services that are due in part to increased communications as part of the municipal service review program. The updated draft incorporates earlier feedback from the Committee provided at its December 2022 meeting in step with continuing to formalize and expand on existing practices in administering out-of-agency service activities. The item is being presented for additional discussion and feedback with the opportunity for the Committee to forward formal recommendations to the Commission.

DISCUSSION

This item is for the Committee to review an updated draft policy governing the process in receiving, evaluating, and acting on out-of-agency service requests. The updated draft is being presented for feedback - including direction on possible revisions - as part of an ongoing public review and comment period. The updated draft includes further refinement – especially with respect to the listing of local exemptions – based on Committee feedback at its December 2022 meeting. The updated draft has also been expanded to provide a mechanism for the Chair or Vice Chair to redirect a decision by the Executive Officer to the full Commission when acting on requests that address public health and safety threats.

Administration

Keene Simonds, Executive Officer 2550 Fifth Avenue, Suite 725 San Diego, California 92103-6624 T 619.321.3380 www.sdlafco.org lafco@sdcounty.ca.gov

Chair Jim Desmond County of San Diego Joel Anderson County of San Diego Nora Vargas, Alt.

County of San Diego

Kristi Becker City of Solana Beach City of San Diego Dane White City of Escondido John McCann, Alt. City of Chula Vista

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Jo MacKenzie Vista Irrigation Barry Willis Alpine Fire Protection David A. Drake, Alt.

Rincon del Diablo

Andy Vanderlaan **General Public** Harry Mathis, Alt. General Public

Key provisions included in the updated draft follow.

- Make explicit the Commission's policy preference to consider out-of-agency service requests on an exception basis when otherwise merited new or extended municipal services cannot be accommodated through jurisdictional changes.
- Establish local definitions for "new" and "extended" services and in doing so, frame the overall extent of the Commission's regulation of out-of-agency services as follow.
 - New services would involve the actual delivery of municipal functions or classes to previously unserved non-jurisdictional lands and/or the re-commencement of functions or classes after a discontinuous period of six or more months.
 - Extended services mean the intensification of municipal functions or classes to served (actual) non-jurisdictional lands that requires a zoning change.
- Make explicit the Commission determines statutory and local exemptions eligibility and provide an expedited process for cities and special districts to receive confirmation from the Executive Officer at no cost.
- Establish local exemptions to include all of the following activities provided through contracts between two or more public agencies:
 - Abandoned Vehicle Abatement
 - Animal Care and Control
 - Billing, Accounting, and Payroll
 - Building and Code Enforcement
 - Cable and Wireless Communications
 - Economic Development
 - Geographic Information Services (GIS)
 - Grant Writing
 - Information Technology (IT)
 - Landscape maintenance
 - Pooled Equipment Purchasing
 - Pooled Materials Purchasing
 - Pooled Services Purchasing
 - Regional Advocacy
- Distinguish the review and approval authority between the Commission and Executive Officer. The Executive Officer shall consider all emergency requests via public health and safety threats and provide notice to the Commission at the next public meeting. However, either the Chair or Vice Chair would be authorized to redirect any decision by the Executive Officer to the full Commission.

San Diego LAFCO

September 15, 2023

Agenda Item No. 5c | Updated Draft Policy on Out-of-Agency Services

A copy of the updated draft policy is attached. Also attached is an email exchange between LAFCO staff and Chair Thorner providing addition and helpful guidance on how the policy would be implemented relative to real-time examples.

ANALYSIS

The updated draft policy before the Committee serves to remedy an ongoing omission with respect to providing clear and formal direction on how LAFCO chooses to meet its delegated duty to regulate out-of-agency services. Addressing this omission – markedly – has become a higher priority given increased conversations with cities and special districts through the municipal service review process and the Commission's overall interest to sync spheres of influence to reflect and accommodate orderly service areas. The timing of the policy work also syncs with recent out-of-agency service disputes between local agencies coming forward. Towards this end, and as detailed above, the updated draft aims to reflect and amplify existing practices that have generally served the Commission well – including delegating emergency requests to the Executive Officer. Proposed local definitions and exemptions similarly reflect existing and best practices and serves to efficiently scale implementation of Section 56133. Staff is hopeful of getting the Committee's support in advancing the draft update for formal consideration by the Commission at a future meeting.

RECOMMENDATION

Review and discuss as requested.

ALTERNATIVES FOR ACTION

None. Any related action by the Committee – including making formal recommendations to the Commission and/or LAFCO staff – can be accommodated through a successful motion.

PROCEDURES

This item has been placed on the Committee's agenda for discussion and possible action as part of the business calendar. The following procedures are recommended in the consideration of this item:

- 1) Receive verbal presentation from staff unless waived.
- 2) Invite comments from interested audience members.
- 3) Discuss item and provide feedback as requested.

Respectfully,

Attachments:

- 1) Updated Draft Policy on Out-of-Agency Services
- 2) Email Exchange with Chair Thorner on Real-Time Examples

Carolanne Ieromnimon Analyst II

San Diego LAFCO September 15, 2023 Agenda Item No. 5c | Updated Draft Policy on Out-of-Agency Services

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Subject:

OUT-OF-AGENCY SERVICES (Exclusive of Fire Protection Services)

Purpose:

Serve as a guide to the Commission in receiving, evaluating, and acting on requests by cities and special districts to provide new or extended services other than fire protection outside their jurisdictional boundaries.

Background:

State law requires cities and special districts to request and receive Commission approval before providing new or extended outside services by contracts or agreements with limited exemptions (Government Code Section 56133).¹

Policy:

It is the policy of the Commission:

- 1. Goals and Priorities:
 - a) The Commission will consider out-of-agency service requests whenever otherwise merited new or extended services cannot be reasonably accommodated through annexations or other jurisdictional changes.
 - b) The Commission shall only approve out-of-agency service requests for cities and special districts involving territory within their spheres of influence in anticipation of future jurisdictional changes.
 - i. The Commission will exercise independent discretion in potentially prescribing the timing of future jurisdictional changes through its authority to condition out-of-agency service approvals.
 - c) The Commission shall only approve out-of-agency service requests for cities and special districts involving territory outside their spheres of influence in response to existing or impending public health and safety threats.
 - i. The Commission will exercise its independent discretion in determining when existing or impending public health and safety threats exist based on available documentation and analysis provided by LAFCO staff.

¹ Contracts involving fire protection services are separately addressed under Government Code Section 56134 and are not covered under this policy.

2. Definitions:

- a) "Agreement" and/or "contract" shall mean a formal written arrangement contemplated under Section 56133.
- b) "Service" shall mean any authorized municipal service functions and/or classes provided by cities and special districts other than fire protection as well as those exempted by the Commission within Section 3 of this policy.
- c) "New service" shall mean the actual provision of municipal service functions or classes to previously unserved non-jurisdictional lands.
 - i. New service shall also mean the re-commencement of actual services after a discontinuous period of six or more months.
- d) "Extended service" shall mean the intensification of municipal service functions and/or classes to served (actual) non-jurisdictional lands that require a zoning change by the land use authority.

3. Applicability and Exemptions:

- a) The Commission determines eligibility of all statutory exemptions under 56133(e) as well as local exemptions provided under this policy.
- b) The Commission shall emphasize the "point of delivery" in assessing the applicability of Section 56133.
 - i. Cities and special districts may request a no-cost determination from the Commission with respect to whether any proposed out-of-agency services are eligible for exemption under 56133 (e) and/or Section 3 of this policy.
 - ii. The Commission delegates all inquiries for exemption eligibility under 56133(e) and/or Section 3 of this policy to the Executive Officer.
 - iii. The Executive Officer is authorized to determine eligibility under 56133(e) and/or Section 3 of this policy. The Executive Officer shall provide written notice of their determination to the city or special district to either accept, deny, or deny pending additional information all exemption inquiries within five business days.

- iv. Should the Executive Officer determine an inquiry does not qualify for exemption, the city or special district may appeal directly to the full Commission. The appeal request must be made in writing and signed by the city manager or special district manager.
- c) With respect to statutory exemptions under 56133, they include all of the following:
 - i. "Two or more public agencies where the public service to be provided is an alternative to, or substitute for, public services already being provided by an existing public service provider and where the level of service to be provided is consistent with the level of service contemplated by the existing service provider."
 - ii. "The transfer of nonpotable or nontreated water."
 - iii. "The provision of surplus water to agricultural lands and facilities, including, but not limited to, incidental residential structures, for projects that serve conservation purposes or that directly support agricultural industries. However, prior to extending surplus water service to any project that will support or induce development, the city or district shall first request and receive written approval from the commission in the affected county."
 - iv. "An extended service that a city or district was providing on or before January 1, 2001."
 - v. "A local publicly owned electric utility, as defined by Section 9604 of the Public Utilities Code, providing electric services that do not involve the acquisition, construction, or installation of electric distribution facilities by the local publicly owned electric utility, outside of the utility's jurisdictional boundary."
 - vi. "A fire protection contract, as defined in subdivision (a) of Section 56134."
- d) With respect to local exemptions established by the Commission in administering 56133, they include all of the following:
 - i. Services provided on an entirely advisory basis where no monetary compensation directly or indirectly and other than reimbursements is received by the contracted cities or special districts.

- ii. Temporary access to treated water supplies from an outside city or special district due to an interruption planned or emergency in normal operations for the receiving agency.
- iii. Temporary access to send untreated wastewater to an outside city or special district or an associated joint-powers authority for subsequent treatment and/or disposal due to an interruption planned or emergency in normal operations for the sending agency.
- iv. Services provided between two or more cities and/or special districts through automatic aid agreements. Examples include, but not limited to, providing first-response police protection responses.
- v. Services provided between two or more cities and/or special districts involving any of the following activities that may, or not, provide monetary compensation beyond reimbursements:
 - Abandoned Vehicle Abatement
 - Animal Care and Control
 - Billing, Accounting, and Payroll
 - Building and Code Enforcement
 - Cable and Wireless Communications
 - Economic Development
 - Geographic Information Services (GIS)
 - Grant Writing
 - Information Technology (IT)
 - Landscape maintenance
 - Pooled Equipment Purchasing
 - Pooled Materials Purchasing
 - Pooled Services Purchasing
 - Regional Advocacy

4. Approval Request Procedures:

- a) All approval requests for out-of-agency services shall be made in writing by cities and special districts and filed with the Executive Officer. Requests shall be made in letter form, signed by the city or special district manager, and include the following items:
 - i. Narrative description of the level and range of services to be provided.
 - ii. Identification and/or description of the affected territory.

- iii. Description on how the services will be provided and funded.
- iv. A copy of the proposed service agreement or contract.
- v. Application fee.
- b) As appliable, documentation substantiating the nature of the existing or impending threat to public health and/or safety shall accompany any requests for out-of-agency service approvals.

5. Evaluation Procedures:

- a) Requests for out-of-agency service approvals that are not premised on addressing public health and/or safety threats shall be considered by the Commission consistent with the following local procedures.
 - i. The Executive Officer shall confirm in writing within 30 days of receipt whether the out-of-agency service request is complete.
 - ii. Incomplete requests shall be referred back to the cities and special districts no later than 30 days from initial receipt with an enumeration of all outstanding items.
 - iii. Complete requests shall be presented to the Commission along with Executive Officer recommendations at the next available meeting.
 - iii. Commission shall approve, approve with conditions, or deny by majority vote of members present.
- 6. Evaluation Procedures Public Health or Safety Reasons:
 - a) Requests for out-of-agency services premised on addressing public health and/or safety threats are delegated to the Executive Officer for consideration consistent with the following local procedures.
 - i. The Executive Officer shall provide notice to any known alternative service providers before taking any actions on requests.
 - ii. The Executive Officer shall take written action on completed requests as soon as reasonably practicable to either approve, approve with conditions, or deny and subject to a 48-hour administrative hold. The

Executive Officer shall provide written notice of his or her action to the Chair and Vice Chair.

- ii. At any time within the 48-hour administrative hold, the Chair and/or Vice Chair may redirect the Executive Officer's decision on the out-of-agency service request to the Commission.
- iii. Should the Chair and/or Vice Chair redirect under (ii), the Commission shall consider the Executive Officer's decision as a recommendation and independently approve, modify, or deny the out-of-agency service request at the next regular or special meeting. Item may also be continued as needed.
- iv. Should the Executive Officer's decision not be redirected to the Commission under (ii), notice of the action taken on the out-of-agency service request shall be provided to the Commission for information only at the next regular meeting.

7. Reconsideration

a) If an out-of-agency service request has been approved with conditions or denied, the applicant may request reconsideration to the Commission.

Simonds, Keene

From: Kim Thorner < KThorner@olivenhain.com>
Sent: Monday, September 11, 2023 8:26 AM

To: Simonds, Keene

Subject: [External] RE: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

Categories: Red Category

Yes, I think adding it would help folks understand. I added some more information below in green as responses, if that is helpful as well.

From: Simonds, Keene < Keene. Simonds@sdcounty.ca.gov>

Sent: Friday, September 8, 2023 8:20 AM **To:** Kim Thorner < KThorner@olivenhain.com>

Subject: RE: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

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Hi Kim -

Would it be okay if we include your examples into the agenda report? I think it would really help the discussion ©. Keene

From: Simonds, Keene

Sent: Wednesday, September 6, 2023 7:35 PM

To: Kim Thorner <KThorner@olivenhain.com>; Peters, Michaela A <Michaela.Peters@sdcounty.ca.gov>

Subject: RE: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

Hi Kim -

These are really good. It's like a LAFCO pop quiz on 56133. See below with the collective highlight that you are illuminating the unique role of recycled water; perhaps the Committee may want to consider a local policy carve-out to exempt these service activities with some friendly LAFCO-guardrails. I also think your examples highlight the benefit of adding some clarifying language in how LAFCO values the point of delivery in applying 56133.

From: Kim Thorner < KThorner@olivenhain.com Sent: Wednesday, September 6, 2023 5:42 PM

To: Simonds, Keene < Keene. Simonds@sdcounty.ca.gov >; Peters, Michaela A < Michaela. Peters@sdcounty.ca.gov >

Subject: [External] RE: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

Keene - These are the ones I could think of off the top of my head that could be subject to this out of agency service request process. Take a look and let me know what you think or if you need more detail on these. Kim

1. OMWD Agreement with Vallecitos Water District (VWD) for water treatment services whereby OMWD treats raw water for VWD at a cost beneficial to both agencies.

There is no service being provided relative to 56133. 56133 applies when one agency provides a service by contract beyond its boundary. In this example, neither party is providing a service beyond their boundaries. VID is only purchasing a supply (potable water) from OMWD. The supply morphs into a "service" only at the point of delivery to the end user – which are the ratepayers within VID.

- 2. OMWD Agreement with Vallecitos Water District whereby OMWD buys recycled water from VWD. There is no service being provided relative to 56133. In this example, neither party is providing a service beyond their boundaries. OMWD is only purchasing a supply (recycled water) from VID. The supply morphs into a "service" only at the point of delivery to the end user which are the ratepayers within OMWD.
- 3. OMWD Agreement with City of San Diego whereby OMWD buys recycled water from City of San Diego There is no service being provided relative to 56133. In this example, neither party is providing a service beyond their boundaries. OMWD is only purchasing a supply (recycled water) from San Diego. The supply morphs into a "service" only at the point of delivery to the end user which are the ratepayers within OMWD.
- 4. OMWD Agreement with City of San Diego to provide recycled water to Fairbanks Ranch Golf Course, in the City of SD
 - This is a service subject to 56133. In this example, as I understand it, OMWD is providing a service (recycled water) to end users beyond their jurisdictional boundary. The next question is whether any of the statutory exemptions appropriately apply under subsection (e). If not and unless LAFCO were to create a local exemption in policy than OMWD would need to apply for approval at LAFCO.
- 5. OMWD Agreement with City of San Diego to provide recycled water to Surf Cup Soccer field, in the City of SD This is a service subject to 56133. In this example, as I understand it, OMWD is providing a service (recycled water) to end users beyond their jurisdictional boundary. The next question is whether any of the statutory exemptions appropriately apply under subsection (e). If not and unless LAFCO were to create a local exemption in policy than OMWD would need to apply for approval at LAFCO.
- 6. OMWD Agreement with San Dieguito Water District to provide recycled water to three properties in the OMWD service area.
 - This is a service subject to 56133. In this example, as I understand it, San Dieguito WD is providing a service (recycled water) to end users beyond their jurisdictional boundary. The next question is whether any of the statutory exemptions appropriately apply under subsection (e). If not and unless LAFCO were to create a local exemption in policy than SDWD would need to apply for approval at LAFCO.
- 7. OMWD Agreement with San Elijio JPA whereby OWMD buys recycled water from VWD. There is no service being provided relative to 56133. In this example, none of the parties are providing a service beyond their boundaries. OMWD is only purchasing a supply (recycled water) from VWD via its parental guardian San Elijo JPA. The supply morphs into a "service" only at the point of delivery to the end user which are the ratepayers within OMWD.
- 8. OMWD Agreement with RSF CSD to buy recycled water from their Santa Fe Valley plant
 There is no service being provided relative to 56133. In this example, neither party is providing a service beyond
 their boundaries. OMWD is only purchasing a supply (recycled water) from Rancho Santa Fe CSD. The supply
 morphs into a "service" only at the point of delivery to the end user which are the ratepayers within OMWD.
- 9. OMWD joint use of facilities with SFID for AMI towers
 I am not familiar with AMI towers so not sure. The answer would tie to determining the point of delivery. AMI
 towers are somewhat like cell towers, but they are dedicated to picking up reads from meters throughout
 portions of the District. OMWD has many of them, as does SFID. Some are located on property owned outside
 of each agencies service area (on property owned by the other agency) as they are ideal locations, generally at
 the top of hills. The towers pick up the reads from the meters and send them back to the respective districts.

- 10. OMWD Contract with Leucadia WW to share vactor truck use in exchange for valve turning truck use, with employees included for the use of the equipment. I believe this type of service is subject to 56133, though the Commission and/or other EOs may reasonably see this differently. My take is premised on the assumption that either OMWD or Leucadia employees would find themselves operating a vactor truck with the "service" (wastewater (collection-class) via sludge removal) point of delivery outside their home agency boundary. The draft policy before the Committee does include a local carve-out to exempt this type of shared equipment.
- 11. OMWD Contract with San Elijo JPA whereby SEJPA utilizes OMWD safety related resources and OMWD has access to their Grade IV WW Operator Interesting. What exactly is the safety related resource? The latter component with San Elijo JPA personnel providing a service (wastewater (treatment class)) where the point-of-delivery occurs outside their member agencies' boundaries seemingly triggers 56133. However, and consistent with the intent of creating a local exemption for otherwise nominal shared service arrangements, I would think adding to the list "equipment operators" would be appropriate. This agreement provides SEJPA staff the opportunity to attend OMWD's scheduled safety trainings and allowing SEJPA to make certified wastewater operators available to OMWD based upon need and availability.
- 12. Contracts with local fire departments whereby OMWD pays them to inspect hydrants and paint them Interesting. If the service (fire protection (prevention class) point-of-delivery is happening outside these fire agencies' boundaries then 56133 does apply. However, it is also seems these arrangements could qualify for an exemption under (e) since it is reasonable to assume would otherwise and readily do this service. Happening within the fire agency's boundary.
- 13. Occasional shared Grade 5 treatment plant operator with Oceanside, Poway, during their times of transition as a Grade 5 cert is required.

 Interesting. The frequency and lack therein might moot the need for 56133 compliance. More information is needed. Very infrequent. Once in the last ten years at each agency when they were down a Grade 5.
- 14. Interconnects to distribute and sell potable water between OMWD, San Dieguito Water District, Vallecitos Water District, and Santa Fe Irrigation District for water quality and/or during shutdowns.

 I would assume these service activities trigger 56133 compliance but also readily meet (e) exemption since the contract service (potable water) is an alternative to service regularly being provided by the receiving agency and/or established before January 1, 2001.

 Established before January 2001.
- 15. OMWD agreements with Santa Fe Irrigation District whereby OMWD serves water to properties in SFID's service area (or vice versa) due to the presence of an OMWD water main being closer than an SFID water main to those properties

 Yes, this most definitely would trigger F6122 compliance but and just like No. 14. would presumably qualify.
 - Yes, this most definitely would trigger 56133 compliance but and just like No. 14 would presumably qualify for one of two exemptions under subsection (e). This involves either serving as a contract alternative to OMWD providing an outside service (potable water) that could be otherwise provided by SFID and/or was established before January 1, 2001 and treated as a grandfathered use. It gets complicated however if the service gets "extended."
- 16. OMWD agreements with eight other North County water and wastewater agencies by which to jointly develop regional recycled water plans and to accept state and federal grant funds for the development of that infrastructure, which many times goes across interagency boundaries.

 Interesting. It depends on what the "service" is. It seems a good cover would be to add "grant activities" to the local carve out that may lead to services with points of deliveries outside all of the participating agencies' boundaries.

 I would like to see grant activities added as we frequently join together to get grants to be competitive with the bigger agencies!

17. OMWD agreement with SDWD/SFID/Escondido for joint maintenance of regional cathodic protection of pipelines network.

Interesting. Where is the point-of-delivery? In each agency's service area and/or easements crossing through another agency's jurisdiction where we have facilities near each other. The cathodic can protect multiple facilities in corrosive soils. The cathodic protection helps both agencies.

18. Current Principals of Understanding and potential future agreement with SEJPA re: conveyance of brine to San Elijo WRF should OMWD construct its conceptual San Dieguito Valley Brackish Groundwater Desalination Facility.

Interesting. This reminds me of cities trucking wastewater to an off-site treatment facility, which is a touchy topic in the Bay Area. It seems like the point of delivery remains in OMWD since the supply (potable water) remains in place while the salt is removed. Let me think more about this...

From: Simonds, Keene < Keene. Simonds@sdcounty.ca.gov >

Sent: Friday, September 1, 2023 12:49 PM

To: Kim Thorner <KThorner@olivenhain.com>; Peters, Michaela A <Michaela.Peters@sdcounty.ca.gov>

Subject: Re: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

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Awesome

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From: Kim Thorner < KThorner@olivenhain.com > Sent: Friday, September 1, 2023 12:07:40 PM

To: Simonds, Keene < Keene < Michaela.Peters@sdcounty.ca.gov>

Subject: [External] RE: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

Perfect. I will get the list over to you on Tuesday. Have a great holiday weekend.

From: Simonds, Keene < Keene.Simonds@sdcounty.ca.gov

Sent: Friday, September 1, 2023 11:59 AM

To: Kim Thorner <KThorner@olivenhain.com>; Peters, Michaela A <Michaela.Peters@sdcounty.ca.gov>

Subject: RE: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

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That would be wonderful Kim. Send a few examples our way and we can respond with how the current policy proposal would provide ©

Keene Simonds Executive Officer

San Diego County

Local Agency Formation Commission (LAFCO)

Subdivision of the State of California | Regional Service Planning 2550 Fifth Avenue, Suite 725 San Diego, California 92103-6624

T 619-321-3380

E keene.simonds@sdcounty.ca.gov



From: Kim Thorner < KThorner@olivenhain.com Sent: Friday, September 1, 2023 11:26 AM

To: Peters, Michaela A < <u>Michaela.Peters@sdcounty.ca.gov</u>> **Cc:** Simonds, Keene < Keene. Simonds@sdcounty.ca.gov>

Subject: [External] RE: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

Hi guys – Happy Friday. I was wondering if we could do a real world test run on the proposed policy with OMWD as an example? I could generate a list of all the agreements that I have with other agencies for treatment services, painting hydrants, equipment and personnel sharing, interconnections, etc. and you could respond whether they would be exempt, require review/fee, etc. Also, are existing agreements grandfathered or would they all have to be reviewed? It might be helpful to have this real world example for the SDAC committee to understand how the policy as written would work and I don't mind having OMWD as the example. What do you think? Kim

From: Peters, Michaela A < Michaela. Peters@sdcounty.ca.gov>

Sent: Thursday, August 31, 2023 3:46 PM

To: Peters, Michaela A < Michaela. Peters@sdcounty.ca.gov>

Cc: chris@alchemycg.com; kperaino@vcmwd.org; Celina McDowell cmcdowell@sfidwater.org; <a href="mailto:mailt

Subject: Draft Policy LAFCO Review/Approval Process for Out-of-Agency Service Requests

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Hello SDAC Members (bcc),

On behalf of the vacationing Carol Ieromnimon, attached to this email is a draft policy on the LAFCO review/approval process involving out-of-agency service requests. This item will be part of the next SDAC meeting agenda set for Friday, September 15th.

More agenda items for the Sept 15th meeting will be sent separately.

Should you have any questions about the out-of-agency service request policy, please contact me in Carol's absence by phone or email.

Thank you,

Michaela Peters

Local Government Analyst

San Diego County

Local Agency Formation Commission (LAFCO)

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