



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

**5a**

**AGENDA REPORT**  
 Business | Discussion

December 15, 2023

**TO:** Special Districts Advisory Committee  
**FROM:** Carolanne Ieromnimon, Analyst II  
**SUBJECT:** Draft Policy on Out-of-Agency Services

**SUMMARY**

The Special Districts Advisory Committee (“Committee”) will review the newest version of a draft policy to govern out-of-agency service activities in San Diego County. The newest version is the fourth overall and builds on feedback provided by the Committee in September 2023 (second version) and Commission in October 2023 (third version), respectively. The preparation of the draft policy itself ties to the adopted workplan and premised on providing clear rules of engagement between local agencies and LAFCO with respect to the former complying with Government Code Section 56133 and receiving LAFCO approval before providing contract out-of-agency services. Staff anticipates drawing on the Committee feedback in presenting a final draft version to the Commission for action in February 2024.

**BACKGROUND**

**Government Code Section 56133**

State law was expanded in January 2001 to require cities and special districts to request and receive approval from LAFCOs before providing new or extended services outside their jurisdictions by contracts or agreements. The addition is codified in Government Code Section 56133 and includes a limited number of exemptions where LAFCOs’ approval is not needed. The includes agreements between two or more public agencies where the contract service is an equal substitute for services already provided.

<b>Administration:</b> Keene Simonds, Executive Officer 2550 Fifth Avenue, Suite 725 San Diego, California 92103 T 619.321.3380 E lafco@sdcountry.ca.gov www.sdlafco.org	<b>Chair Jim Desmond</b> County of San Diego  <b>Joel Anderson</b> County of San Diego  <b>Nora Vargas, Alt.</b> County of San Diego	<b>Kristi Becker</b> City of Solana Beach  <b>Dane White</b> City of Escondido  <b>John McCann, Alt.</b> City of Chula Vista	<b>Vice Chair Stephen Whitburn</b> City of San Diego  <b>Marni von Wilpert, Alt.</b> City of San Diego	<b>Jo MacKenzie</b> Vista Irrigation  <b>Barry Willis</b> Alpine Fire Protection  <b>David A. Drake, Alt.</b> Rincon del Diablo	<b>Andy Vanderlaan</b> General Public  <b>Harry Mathis, Alt.</b> General Public
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## Annual Workplan & Direction to Prepare Policy on Out-of-Agency Services

LAFCO's current annual workplan was adopted at a noticed public hearing in May 2023 and includes 30 specific projects for the fiscal year with several having been carried over from the prior fiscal year. One of these carried over projects involve establishing formal policies to govern out-of-agency service approvals at LAFCO and in doing so focus on formalizing and expanding on existing practices.

### Earlier Draft Policy Versions on Out-of-Agency Services

LAFCO staff prepared an initial draft policy on out-of-agency services for discussion by the Commission in November 2022. The initial version was marked by staff proposing the establishment of local definitions for "new" and "extended" services as well as local exemptions in which certain out-of-agency services would not require formal review and approval. Staff also included an explicit policy in the initial version that the Commission determines exemption (statute and local) eligibility. This initial version was subsequently shared with the Committee in December 2022. The resulting feedback informed a second draft version, which expanded local exemptions along with other refinements and presented back to the Committee in September 2023. This latter meeting informed a third draft version presented to the Commission in October 2023 that no longer included an explicit policy advising the Commission determines exemption eligibility.

### DISCUSSION

This item is for the Committee to review the fourth version of a draft policy governing the process in receiving, evaluating, and acting on out-of-agency service requests. The fourth version incorporates feedback generated from the Commission at its October 2023 meeting and marked by reinstating an earlier policy statement that LAFCO determines exemption eligibility. The fourth version also incorporates most of the revisions recently requested by a consortium of district general managers led by Brian Olney with Helix Water District. This latter grouping of revisions is marked by expanding on the list of exemptions, specific to agreements between two or more agencies, as they relate to cost and scope, as well as adding to the list of activities under the shared services between cities and special districts. This latter grouping also includes revising language throughout the document to be more inclusive/exact specifically to the policy's premising goals and priorities.

A summary of all key provisions reflected in the fourth versions follows.

- 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.
- Premise the policy on the Commission's preference to consider out-of-agency service requests on an exception basis when otherwise merited 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 facilitated by a zoning change.
- Establish local exemptions in which Commission review and approval – which is separate from determining eligibility – is not required for the following activities:
  - Advisory or automatic aid services provided by a city and/or special district where no monetary compensation is provided other than reimbursements.
  - Temporary access to a city and/or special district’s potable water or wastewater collection, treatment, and discharge facilities.
  - Shared services between two or more agencies where monetary compensation is provided beyond reimbursements for any of the following:
    - Abandoned Vehicle Abatement
    - Accounting, Billing, and Payroll
    - Animal Care and Control
    - Building and Code Enforcement
    - Customer Service
    - Dispatch
    - Grant Writing
    - Heavy Equipment Exchange and/or operation
    - Human Resources
    - Information Technology
    - Laboratory Services
    - Legal
    - Pooled Equipment Purchasing and Use
    - Pooled Materials Purchasing and Use
    - Pooled Services Purchasing and Use
    - Public Affairs/Outreach
    - Training
    - Water, Wastewater, Recycled Water, Stormwater and Advanced Purification Plan Operations
- Make explicit LAFCO via the Executive Officer determines exemption eligibility with related no-cost request procedures.

- Amend the existing delegation to the Executive Officer to approve out-of-agency service requests tied to public health or safety threats to only water and wastewater functions. All other requests are redirected to the full Commission.

A copy of the fourth draft version is attached.

## ANALYSIS

LAFCO staff believes the fourth draft version to establishing a policy to govern out-of-agency service activities appropriately reflects both Commission and Committee input to date with deference to the Commission where differences exists. This latter statement applies to the reinstatement of an explicit policy that LAFCO determine exemption eligibility. However, as noted in the preceding section, the balance of the changes requested by the Committee at its September 2023 meeting are reflected in the fourth version along with similar revisions requested by Brian Olney with Helix Water District on behalf of several district general managers – including members on the Committee.

## 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,



Carolanne Ieromnimon  
Analyst II

Attachments:

- 1) Draft Policy on Out-of-Agency Services, Fourth Version
- 2) Communications with Brian Olney with Helix WD

**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).<sup>1</sup>

**Policy:**

It is the policy of the Commission:

## 1. Goals and Priorities:

- a) ~~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 will review out-of-agency service agreements not previously considered by the Commission in conjunction with future applications for related changes to organization and not unilaterally seek out and review out-of-agency service agreements for compliance with Government Code Section 56133.
- 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

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

response to efficient utilization of regional government resources and existing or impending public health and safety threats.

- i. The Commission will exercise its independent discretion in determining efficient utilization of government resources and when existing or impending public health and safety threats exist with consideration of State Water Resources Control Board Division of Drinking Water, Regional Water Quality Control Board, California Department of Public Health and San Diego County Department of Public Health regulatory guidance and based on available documentation and analysis provided by LAFCO staff.

## 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 4 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:

a) The Commission determines exemption eligibility of all statutory exemptions under 56133(e) as well as local exemptions provided under this policy.

~~a)~~b) The Commission shall emphasize the "point of delivery" in assessing the applicability of Section 56133.

~~b)~~c) Cities and special districts may request a no-cost determination from the Commission as to whether any proposed out-of-agency services are eligible for exemption under 56133 (e) and/or Section 4 of this policy.

- i. The Commission delegates all inquiries for exemption eligibility under 56133(e) and/or Section 3 of this policy to the Executive Officer. 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.
- ii. 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.

#### 4. Exemptions

- a) In addition to those provided by the Legislature under Section 56133(e), which includes agreements established prior to 2001, the Commission establishes the following local exemptions in which approvals are not required:
  - i. Advisory or automatic aid services provided by a city and/or special district where no monetary compensation other than reimbursements are exchanged.
  - ii. Agreements solely involving two or more public agencies where the public service to be provided (by Agency A) is an alternative to, or substitute for, public services already being provided by an existing public service provider (by Agency A) is consistent with the level of service contemplated by the existing service provider (Agency B).
    - a. For the purposes of this section, "already being provided" means the services are within the agency's (Agency B) jurisdictional boundary and an established service area wherein services are being actively provided by the agency (Agency B).
    - b. For the purposes if this section, "contemplated" means:
      - i. The service level is anticipated in a master plan or some long-range planning document of Agency B.
      - ii. Sufficient infrastructure and capacity exists (by Agency A) to provide the service.
  - iii. Service agreements between cities and/or special districts for the use, installations, and maintenance of meter or operational technology (OT)

communications infrastructure similar to wireless ethernet, cellular towers, fiber optic, etc.  
iv. Agreements involving Cathodic protection of pipelines.

ii.v. Temporary access to cities and/or special districts' potable water supplies due to an interruption – planned or otherwise.

vi. Temporary access to cities and/or special districts' wastewater collection, treatment, or discharge facilities.

iii.vii. Temporary access to cities and/or special districts' potable, raw, or recycled water when deemed the best and most efficient use of resources.

iv.viii. Shared services between cities and/or special districts where monetary compensation is exchanged beyond reimbursements for any of the following activities:

- Abandoned ed Vehicle Abatement
- Accounting, Billing, and Payroll
- Animal Care and Control
- Building and Code Enforcement
- Customer Service
- Dispatch
- Grant Writing
- Heavy Equipment Exchange and/or operation
- Human Resources
- Information Technology
- Laboratory Services
- Legal
- Pooled Equipment Purchasing and Use
- Pooled Materials Purchasing and Use
- Pooled Services Purchasing and Use
- Public Affairs/Outreach
- Training
- Water, Wastewater, Recycled Water, Stormwater and Advanced Purification Plan Operations

#### 4. 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 by the city or special district manager and include all of the following information:

- i. Identification of the affected territory by parcel number or another appropriate geographic marker.
- ii. Description of the ability of the agency to provide the contract service and relationship – including impacts – on existing and/or planned infrastructure and resources.
- iii. Application fee.
- iv. Any other information required by the Executive Officer.

5. Consideration Procedures:

- a) The Commission shall consider all requests for out-of-agency service approvals at a public meeting unless otherwise provided in this policy.
- b) The Executive Officer shall ensure all procedures under Section 56133 are completed and responsible for placing the request on the first available meeting agenda thereafter. The Executive Officer shall include his or her written recommendation on the request to the Commission.
- c) Should requests involve purported public health or safety threats, the Commission delegates approval authority to the Executive Officer under the following circumstances.
  - i. The request involves water and/or wastewater services only. If approved, the Executive Officer shall provide notice to the Commission at the next public meeting for information only.
- d) All other requests involving purported public health or safety threats shall be considered by the Commission at the earliest time possible – including the scheduling of a special meeting with no less than 24-hour notice.

7. Reconsideration:

- a) Should an out-of-agency service request be approved with conditions or denied, the applicant may request reconsideration.

8. CEQA

- a) All out-of-agency service request approvals shall be subject to concurrent review under the California Environmental Quality Act (CEQA).
- b) The Commission assigns all functions and related responsibilities provided under CEQA Guidelines Section 15025 to the Executive Officer – including, but limited to, making exemption findings and related findings.

November 13, 2023

Keene Simonds  
San Diego LAFCO  
2550 Fifth Avenue, Suite 725  
San Diego, CA 92103

Delivered via email communication

Re: Proposed Out-of-Agency Services Policy

Dear Keene,

The San Diego Local Agency Formation Commission (LAFCO) is working to develop an out-of-agency services policy to formalize and expand existing practices to provide clear direction to all local agencies on how out-of-agency services are regulated. Several local agencies, including ours, have expressed concerns regarding these proposed changes, noting that they create unnecessary oversight, inefficiency in service delivery, a lack of applicable exemptions, and concern with language as written in section 3(a) of the draft policy.

Local agencies would like to work collaboratively with LAFCO to address these concerns and develop a policy that meets both LAFCO and local agency needs. In this effort, we have provided additional comments to the proposed policy on the attached redline version of the Out-of-Agency Services policy. Our recommended changes to the policy provide needed clarification and additional exemptions that help ensure efficient service delivery by local agencies. The additions to the policy also reduce existing concerns with the language used in section 3(a).

Local agencies look forward to working with LAFCO staff on finalizing an out-of-agency services policy and are available to discuss the additional comments provided in the attached redline version of the draft policy.

Sincerely,



Michael T. Thornton, P.E.  
General Manager  
San Elijo Joint Powers Authority



Kyle Swanson  
CEO/General Manager  
Padre Dam Municipal Water District



Paul J. Bushee  
General Manager  
Leucadia Wastewater District



Gary T. Arant  
General Manager  
Valley Center Municipal Water District



Brett Sanders  
General Manager  
Lakeside Water District



Erica Wolski  
General Manager  
Ramona Municipal Water District



Kimberly A. Thorner  
General Manager  
Olivenhain Municipal Water District



Joel A. Scalzitti  
Board of Directors, Helix Water District  
San Diego LAFCO Special Districts Advisory  
Committee



Jose Martinez  
General Manager  
Otay Water District



Al Lau  
General Manager  
Santa Fe Irrigation District

**From:** [Brian Olney](#)  
**To:** [Ieromnimon, Carolanne](#); [Simonds,Keene](#)  
**Subject:** [External] RE: [EXTERNAL] RE: Out of Agency Service Policy  
**Date:** Friday, December 8, 2023 1:41:04 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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Thank you Carol,  
Have a great weekend!

Brian

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**From:** Ieromnimon, Carolanne <[Carolanne.Ieromnimon@sdcounty.ca.gov](mailto:Carolanne.Ieromnimon@sdcounty.ca.gov)>  
**Sent:** Friday, December 8, 2023 1:39 PM  
**To:** Brian Olney <[Brian.Olney@HELIXWATER.org](mailto:Brian.Olney@HELIXWATER.org)>; [Simonds,Keene](#)  
<[Keene.Simonds@sdcounty.ca.gov](mailto:Keene.Simonds@sdcounty.ca.gov)>  
**Subject:** RE: [EXTERNAL] RE: Out of Agency Service Policy

Hi Brian,

I realized I mistakenly did not respond to your email below. My apologies in the delay! We have received your responses and have incorporated the feedback into our draft policy which will be presented to the Special Districts Advisory Committee next Friday, December 15<sup>th</sup>.

We appreciate the time and effort you took to provide us these revisions and feedback.

Thank you!

### Carol Ieromnimon

Local Government Analyst II  
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**From:** Brian Olney <[Brian.Olney@HELIXWATER.org](mailto:Brian.Olney@HELIXWATER.org)>  
**Sent:** Wednesday, November 15, 2023 11:07 AM  
**To:** Ieromnimon, Carolanne <[Carolanne.Ieromnimon@sdcounty.ca.gov](mailto:Carolanne.Ieromnimon@sdcounty.ca.gov)>; [Simonds,Keene](#)  
<[Keene.Simonds@sdcounty.ca.gov](mailto:Keene.Simonds@sdcounty.ca.gov)>  
**Subject:** [External] RE: [EXTERNAL] RE: Out of Agency Service Policy

Hi Carol,

Thanks for providing me some time to respond to your questions and comments. I have inserted responses to your comments in blue to your original email below. I am hopeful that the responses answer your questions or provide clarification as requested. If not, please feel free to contact me.

I also noticed we inadvertently left out a word in the original redline I submitted to you. Section 4(a) (x) – last item was submitted as follows:

Water, Wastewater, Recycled Water and Advanced Purification Plant Operations

It was intended to be submitted as follows:

Water, Wastewater, Recycled Water, Stormwater and Advanced Purification Plant Operations

We appreciate your time in reviewing our policy considerations and working with us to address our concerns in a final policy.

Best,  
Brian

**Brian Olney | General Manager**

O 619-596-1362 | M 619-962-7442 | [brian.olney@helixwater.org](mailto:brian.olney@helixwater.org)



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**From:** Ieromnimon, Carolanne <[Carolanne.Ieromnimon@sdcounty.ca.gov](mailto:Carolanne.Ieromnimon@sdcounty.ca.gov)>

**Sent:** Tuesday, November 14, 2023 12:02 PM

**To:** Simonds,Keene <[Keene.Simonds@sdcounty.ca.gov](mailto:Keene.Simonds@sdcounty.ca.gov)>; Brian Olney <[Brian.Olney@HELIXWATER.org](mailto:Brian.Olney@HELIXWATER.org)>

**Subject:** [EXTERNAL] RE: Out of Agency Service Policy

**CAUTION:** This email originated from outside of Helix Water District. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Brian,

Thank you for taking the time to provide us the suggested revision to the draft OSA policy. We have carefully reviewed the document and are agreeable to most of the suggested changes apart from the following (in red)..

4 (iv): “Recycled water service agreements between cities and/or special districts that provide for the best use of the resource considering infrastructure availability.”

- We believe this standalone exemption is not needed given it is seemingly covered under the suggested change for 4 (a)(ii) and if not, this does merit Commission review.
- Response: Agree that this is seemingly covered under 4(a)(ii), however, it does not cover all scenarios related to best use of recycled water as a resource as directed by SWRCB. Example, Agency A may have a property that could benefit from recycled water use but does not provide recycled water service. Agency B may provide recycled water service and have recycled water infrastructure in close proximity to Agency A property but not have potable water infrastructure close to Agency A property. Under 4(a)(ii), Agency A would not be able to work under this exemption because it does not provide existing recycled water service. Additionally, reorganization of this property to Agency B would require unnecessary and expensive infrastructure to be installed to also provide potable water service. Section 4(a)(ii) covers most scenarios but 4(iv) is also required to maximize use of recycled water where warranted and accessible per SWRCB direction.

1 (a) (first part): “The Commission will review out-of-agency service agreements not previously considered by the Commission”

- This portion is unclear, can you please assist?
- Response: Section 1(a) was taken directly from the Orange County LAFCO 56133 policy. This first statement acknowledges that some agreements may exist that have not previously been reviewed by the Commission/LAFCO staff. If this situation exists, LAFCO will review these agreements in conjunction with future applications for related changes to organization but not unilaterally seek out agreements for review solely for compliance with 56133.
- Not clear on the confusion in this statement in context of the entire statement. Possibly rewording will clarify? For example, “Out-of-Agency service agreements not previously considered will be reviewed in conjunction with future applications for related changes to organization and not unilaterally sought out and reviewed for compliance with Government Code section 56133.”

4 (a) (iii): “Service agreements between cities and/or special districts equal to or less than \$100,000 annually or agreements that provide equal or increased service levels at agreement costs less than estimated infrastructure costs to provide equivalent service levels by each agency.”

- The first portion of this revision we believe is not merited, and the latter portion we can benefit from your clarification on the intent and/or meaning.

Response:

1. The first portion is merited from a cost of service and efficient service delivery aspect. We have provided many specific exemption examples but not every example as this would become overwhelming. This statement provides the ability for agencies to collaborate on the best cost of service basis for a service that may not be listed in other exemptions. The dollar

amount limits this from being overly broad but provides the ability for agencies to continue to collaborate on efficient and cost-effective service delivery to customers. Examples may include Agency A having safety training or safety response expertise and capacity that can be provided to Agency B by agreement. Using the “point of service” aspect, Agency A would not be allowed to provide this service to Agency B because the point of service is outside their sphere. This would mean Agency B would have to spend more than this amount to develop their own training/response at more cost to the end customer. We felt this is in alignment with the Commission request of not having to review non-significant items or items that are daily parts of conducting efficient business practices.

2. The focus of the second portion is related to the cost of providing service to the end user. Our thought was that the provision of service should include analysis of the cost to provide that service and what is most effective. For example, if agency A is the service area but does not have immediate infrastructure and the cost to add the infrastructure is more expensive than it would be for agency B to provide service via agreement, it is more beneficial to use the service agreement because this is ultimately a lower cost to the customer. However, after additional review, this section is seemingly covered under section 4(a)(ii) and could be removed. Cost should always be considered in these actions and likely considered under section 4(a)(ii) also.

Finally, as you may be aware, our Commission expressed strong support to add back in the original item 3(a) which states, “The Commission determines exemption eligibility of all statutory exemptions under 56133(e) as well as local exemptions provided under this policy.” Given the response we received from Commission on this item, we will be bringing it back into the policy for their consideration.

Response: We are aware of the Commission feedback to add back the original item 3(a) language. While we feel inclusion of our items into the policy lessens some concern over this language, we still feel inclusion of this language in its entirety adds legal issues to the policy due to LAFCO adding additional power not provided in state law. We feel LAFCO should determine eligibility of local exemptions that they list in their local policy but “eligibility of all statutory exemptions under 56133(e)” is of concern as previously stated. Statutory exemptions are listed in Government Code 56133(e) so the legislature determined eligibility of these exemptions. We feel the following language is more appropriate and lessens potential legal issues that could arise. “ The Commission determines eligibility of local exemptions in this policy”.

We look forward to hearing back from you on the above and appreciate your efforts in working collaboratively with us on this draft policy update.

With best,

**Carol Ieromnimon**

Local Government Analyst II

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**From:** Simonds,Keene <[Keene.Simonds@sdcounty.ca.gov](mailto:Keene.Simonds@sdcounty.ca.gov)>  
**Sent:** Monday, November 13, 2023 9:05 PM  
**To:** Brian Olney <[Brian.Olney@HELIXWATER.org](mailto:Brian.Olney@HELIXWATER.org)>  
**Cc:** Ieromnimon, Carolanne <[Carolanne.Ieromnimon@sdcounty.ca.gov](mailto:Carolanne.Ieromnimon@sdcounty.ca.gov)>  
**Subject:** RE: Out of Agency Service Policy

Hi Brian –

Thank you!

We are going to take a close look and follow up shortly with you and the crew. More to come!  
Keene.

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Keene Simonds  
Executive Officer

**San Diego County**  
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**From:** Brian Olney <[Brian.Olney@HELIXWATER.org](mailto:Brian.Olney@HELIXWATER.org)>  
**Sent:** Monday, November 13, 2023 12:41 PM  
**To:** Simonds,Keene <[Keene.Simonds@sdcounty.ca.gov](mailto:Keene.Simonds@sdcounty.ca.gov)>; Ieromnimon, Carolanne <[Carolanne.Ieromnimon@sdcounty.ca.gov](mailto:Carolanne.Ieromnimon@sdcounty.ca.gov)>  
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**Subject:** [External] Out of Agency Service Policy

Hi Keene and Carolanne,

Several local agencies have been working together to develop proposed policy language to assist in moving the Out-of-Agency Service Policy forward in a manner workable for LAFCO and local agencies. Please see attached letter and policy redline from the participating agencies. We look forward to working with you and your team in making a model policy for the region.

Please feel free to contact me if you would like to discuss in more detail.

Sincerely,

Brian

(On behalf of the participating agencies)

**Brian Olney | General Manager**

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