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Local Agency Formation Commission - County Of San Bernardino  
Kathleen Rollings-McDonald, Executive Officer  
215 North D Street, Suite 204,  
San Bernardino, CA 92415-0490  
(909) 383-9900

December 19, 2011

Dear Kathleen Rollings-McDonald,

Please accept this letter as comments to the draft Homestead Valley Community Service Review currently undertaken by LAFCO and scheduled for consideration by the Commission in January 2012.

Homestead Valley Community Council, also known as HVCC, was formed in 1997 by the four Homestead Valley communities of Yucca Mesa, Flamingo Heights, Landers, and Johnson Valley. These communities are unincorporated and have "community improvement associations" with 50+ years each of providing them a voice. HVCC is comprised of delegates from each of these four associations in a collaborative effort to address larger matters of mutual interest to our county, state, and federal lawmakers.

The County of San Bernardino developed the *Homestead Valley Community Plan* in 2007, as stated in the LAFCO CSR report. This was done in conjunction with the San Bernardino County General Plan, with input by members of the four community associations and HVCC delegates. Homestead Valley gets its name from the area's history of being largely settled by "homesteaders" under the Small Tracts Act of 1938.

The LAFCO CSR report accurately describes the Homestead Valley Community as *"characterized by wide open spaces and natural features including, rock formations, desert vegetation and wildlife. The predominant land use is rural residential with large lots. There is very little commercial or industrial development."* The County of San Bernardino also recognizes these characteristics mutually shared by the four communities, and these unique characteristics have played a major role in the County's community definition process.

HVCC agrees with the report's recommendation that the commission performs a separate Homestead Valley Community Service Review, and we are grateful for the opportunity to submit input to the process. Unlike the County, to date LAFCO has not provided a community definition for our area as a whole.

In 2010 LAFCO performed a service review for the community of Yucca Valley, as defined by the commission. The review included services to the Yucca Mesa area, defined by San Bernardino County and the General Plan as part of the Homestead Valley community, not the Yucca Valley community.

To the contrary, LAFCO includes Yucca Mesa in the Yucca Valley community definition, based solely upon the Hi-Desert Water District service jurisdiction and sphere of influence. While HVCC recognizes the importance of utilizing service area jurisdictions and their spheres of influence as criteria to assist in the establishment of community definitions, we do not believe it can be a defining factor in all cases, and in particular this case. Yucca Mesa has very little in common with the Community of Yucca Valley otherwise, and instead shares the rural characteristics of its sister communities, appropriately recognized in the San Bernardino County Homestead Valley Community definition.

The conflict in defining communities primarily on service jurisdictions is further underscored by the Commissions direction to staff in 2010 that School District jurisdiction become part of Community Service Review discussions. Johnson Valley is served by Lucerne Valley USD, while the rest of Homestead Valley lies within the Morongo USD. Using school service jurisdictions to help define communities in this case is not practical and the draft report recognizes that the school districts serving Homestead Valley cannot assist LAFCO in final definition of the community. No one is suggesting school district boundaries be adjusted to community boundaries, nor vice versa.

Homestead Valley Community Council believes San Bernardino County's application of community characteristics is more appropriate in defining the Homestead Valley community. We realize it would not be practical to suggest LAFCO abandon the service review currently being conducted under current LAFCO Homestead Valley community definition (that excludes Yucca Mesa), however we strongly urge LAFCO to reconsider its community definition of this area for future reviews, and instead redefine Homestead Valley community to be consistent with the San Bernardino County community definition that includes Yucca Mesa. We ask this definition conflict be addressed by the commission during the January review.

Sincerely,

A handwritten signature in cursive script that reads "Jim Harvey".

Jim Harvey  
President, Homestead Valley Community Council