

LOCAL AGENCY FORMATION COMMISSION FOR SAN BERNARDINO COUNTY

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DATE: OCTOBER 9, 2014 
FROM: KATHLEEN ROLLINGS-McDONALD, Executive Officer
SAMUEL MARTINEZ, Assistant Executive Officer
TO: LOCAL AGENCY FORMATION COMMISSION

SUBJECT: Agenda Item #7: LAFCO 3180 – Reorganization to Include Annexations to County Service Area 54, Detachment from County Service Area SL-1 and Dissolution of County Service Area 73 and Zone A of County Service Area 53 (Streetlight Reorganization for the Mountain Region)

RECOMMENDATION:

The staff recommends that the Commission approve LAFCO 3180 by taking the following actions:

1. For environmental review, certify that LAFCO 3180 is statutorily exempt from the provisions of the California Environmental Quality Act and direct the Executive Officer to file the Notice of Exemption within five (5) days;
2. Approve LAFCO 3180, with the following terms and conditions:
 - a) As a function of the dissolution of County Service Area 53-A, all streetlights currently the responsibility of County Service Area 53-A shall be transferred to County Service Area 54. The County Special Districts Department shall sign the form requesting Bear Valley Electric to transfer the streetlights to County Service Area 54 upon successful completion of the reorganization;
 - b) As a function of the dissolution of County Service Area 73, all streetlights currently the responsibility of County Service Area 73 shall be transferred to County Service Area 54. The County Special Districts Department shall sign the authorization form requesting Southern California Edison to transfer the streetlights to County Service Area 54 upon successful completion of the reorganization;
 - c) As a function of the detachment of the portion of County Service Area SL-1 in Lake Arrowhead, all streetlights currently within said portion of County

Service Area SL-1 shall be transferred to County Service Area 54. The County Special Districts Department shall sign the authorization form requesting Southern California Edison to transfer the streetlights to County Service Area 54 upon successful completion of the reorganization;

- d) As successor agency for County Service Areas 53-A and 73, County Service Area 54 will receive all property tax revenues attributable to both entities per the County Board of Supervisors' Resolution No. 2014-58. In addition, any and all other collections or assets for both County Service Areas 53-A and 73 shall accrue and be transferred to County Service Area 54;
 - e) The appropriation limit currently assigned to County Service Areas 53A and 73, shall be added to that of County Service Area 54;
 - f) Pursuant to Government Code Section 56886.1, public utilities, as defined in Section 216 of the Public Utilities Code, have ninety (90) days following the recording of the Certificate of Completion to make the necessary changes to impacted utility customer accounts; and,
 - g) The standard terms and conditions of approval that include the "hold harmless" clause for potential litigation.
3. Adopt LAFCO Resolution #3192 setting forth the Commission's terms, conditions, and determinations for LAFCO 3180.

BACKGROUND:

On January 14, 2014, the County Board of Supervisors adopted a Resolution of Application requesting a reorganization of all its mountain streetlighting entities. The purpose was to consolidate streetlighting services within the entire mountain region into a single county service area to reduce indirect costs (administrative and other overhead charges) while maintaining the current level of service.

The County Special Districts Department submitted two concurrent proposals – one for the sphere of influence expansion for County Service Area (CSA) 54 (LAFCO 3179), which the Commission approved at its July 2014 Commission hearing, and the reorganization proposal that is now before the Commission for consideration.

The overall reorganization proposal includes annexations to CSA 54, a detachment of an area from CSA SL-1, and the dissolutions of CSA 53 Zone A (53-A) and CSA 73 (see Figure 1 below). The reorganization includes eight (8) specific areas encompassing a total of approximately 8,462 acres. Area 1 is an area being detached from CSA SL-1 and annexed into CSA 54. Area 2 contains the boundaries for CSA 73, which is being dissolved and annexed into CSA 54. Areas 3, 4, and 5 comprises the total area for CSA 53-A, which is also being dissolved and annexed into CSA 54. And finally, Areas 6, 7, and 8 are areas that are simply being annexed into CSA 54. Location and vicinity maps are included as Attachment #1 to this report.

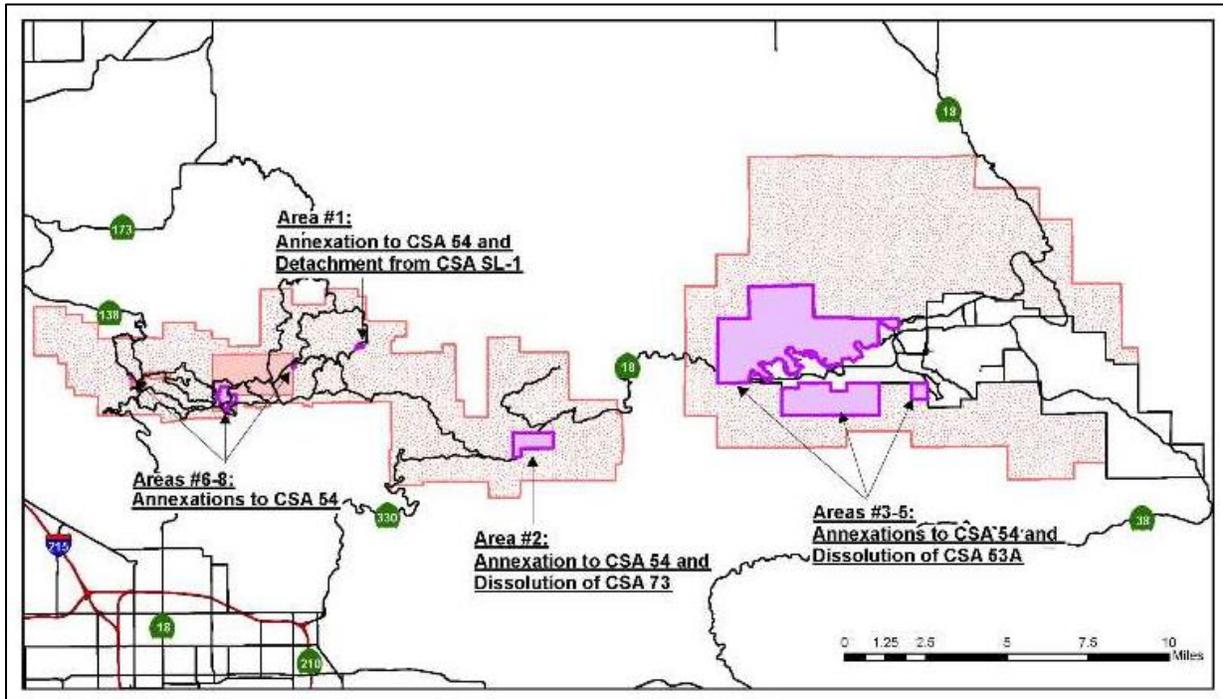


Figure 1 – LAFCO 3180 Reorganization Area

LAFCO staff has been working with the Special Districts Department, Southern California Edison and Bear Valley Electric staff on verifying streetlighting information for the affected entities. In processing this application, LAFCO staff discovered there are streetlights currently located outside of the existing boundaries of the affected entities, which have been funded by them.

For CSA 54, the streetlights identified are all located along the periphery of its boundaries. Therefore, LAFCO staff (with concurrence from the Special Districts Department staff) has modified the proposal to include the annexation of these areas (Areas 6, 7, and 8) into CSA 54 as part of the overall reorganization.

However, one streetlight in the Running Springs area, which is associated with the streetlights funded by CSA 73, is located nowhere near the boundaries of the district. Because of its location—over a mile away from the district’s boundaries—and because the streetlight itself is actually located within the right-of-way easement for State Highway 18, staff is recommending the County consider one of the following options:

1. Transfer of this streetlight to another appropriate entity, such as the California Department of Transportation (CALTRANS) or the County’s Public Works Department; or,
2. If no entity is willing to accept responsibility for the light, the Special Districts Department should shut off the light.

This reorganization proposal will be transferring an estimated total of 38 streetlights from CSA SL-1 (a total of 10 lights), CSA 53-A (a total of 15 lights), and CSA 73 (a total of 15 lights) to CSA 54's existing 174 streetlights. This reorganization will also be annexing the areas that have CSA 54 funded streetlights located outside of its boundaries (12 of the 174 lights). Moving forward, this proposal as modified, will bring CSA 54's total number of streetlights to 224.

As with all reviews for jurisdictional change, the following materials will outline the staff's analysis of the four areas of consideration required: boundaries, land uses, service delivery and financial implications, and environmental considerations. These issues along with additional information are outlined below:

BOUNDARIES:

The reorganization consists of eight (8) individual areas encompassing a total of approximately 8,462 acres located in the San Bernardino Mountain region.

- Area 1 – Detachment from CSA SL-1 and Annexation to CSA 54

Area 1 encompasses approximately 8.46 acres generally located north and south of Hook Creek Road west of State Highway 173, within the unincorporated community of Lake Arrowhead (see Figure 2 below). Area 1 has an estimated total of 10 lights.

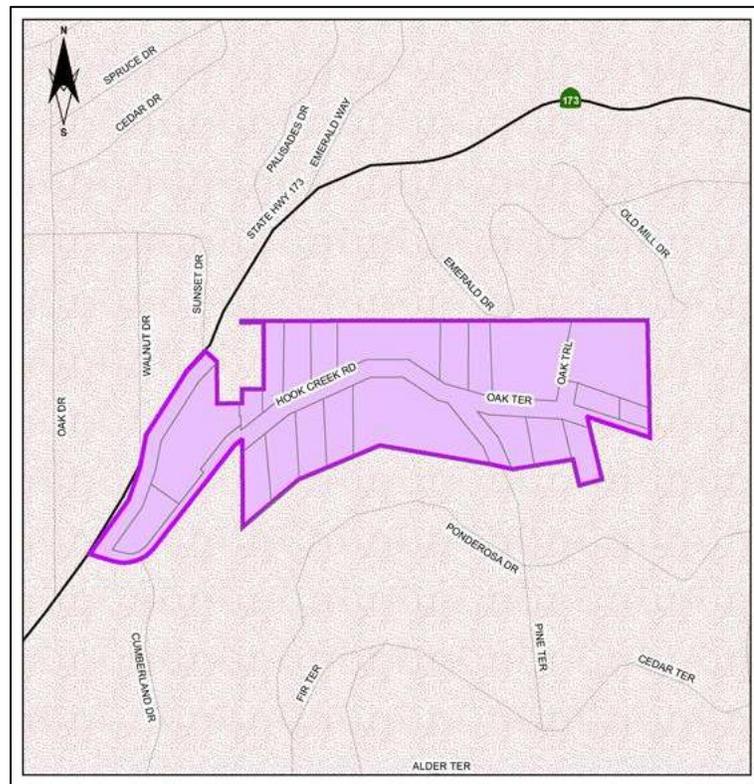


Figure 2 – Detachment from CSA SL-1 and Annexation to CSA 54

- Area 2 – Dissolution of CSA 73 and Annexation to CSA 54

Area 2 encompasses approximately 429 acres and is generally located south of Green Valley Lake, east of Running Springs. Area 2, which includes the unincorporated community of Arrowbear Lake, has an estimated total of 15 lights (see Figure 3 below).

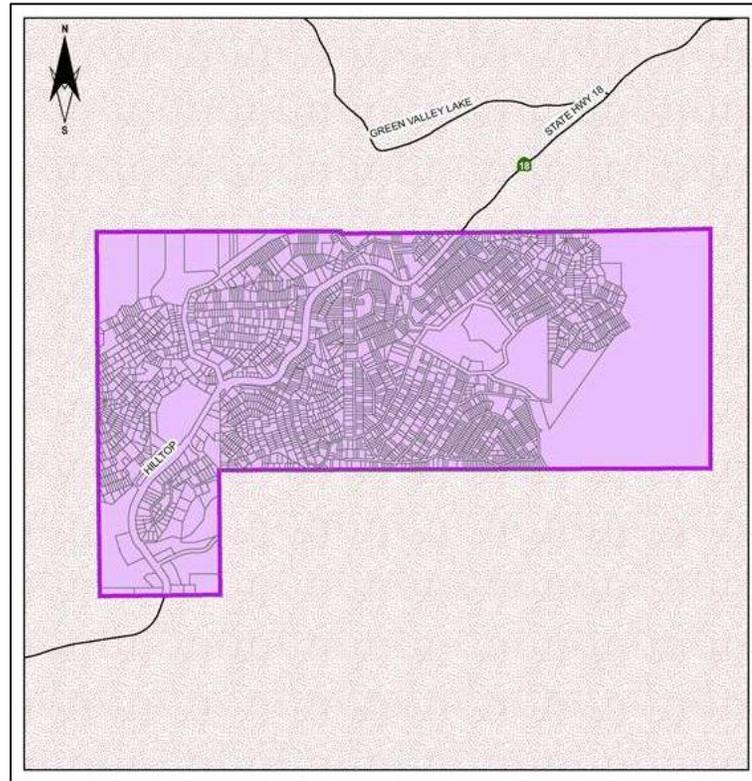


Figure 3 – Dissolution of CSA 73 and Annexation to CSA 54

- Areas 3, 4, & 5 – Dissolution of CSA 53 Zone A and Annexation to CSA 54

Area 3 – encompasses approximately 5,925 acres and is generally located north and west of the City of Big Bear Lake. The area is bordered by a combination of parcel lines and the City of Big Bear Lake on the east and south, and a combination of section lines along the National Forest on the west and north. Area 3, which includes the unincorporated community of Fawnskin and portions of the lake and the National Forest, has an estimated total of 15 lights.

Area 4 – encompasses approximately 1776.4 acres and is generally located south of the City of Big Bear Lake. The area is bordered by a combination of parcel lines and the City of Big Bear Lake on the north, and a combination of section lines on the west, south, and east. The area includes a portion of the National Forest and the Bear Mountain Ski area.

Area 5 – includes a single parcel, APN 0310-251-01 encompassing approximately 157 acres, and is generally located adjacent to the City of Big Bear Lake’s southern boundary.

For areas 3, 4, and 5, see Figure 4 below.

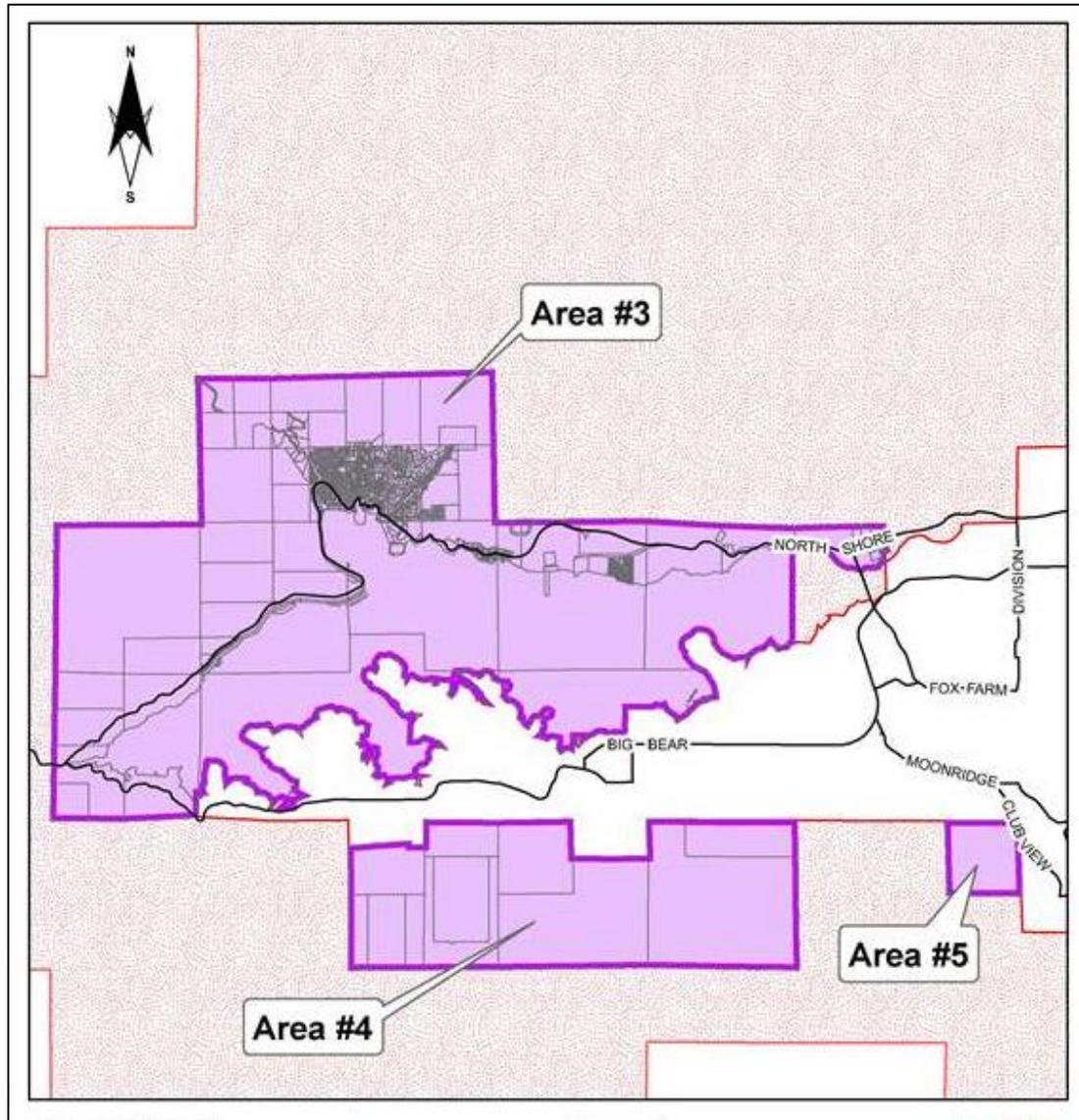


Figure 4 – Dissolution of CSA 53-A and Annexations to CSA 54

- Areas 6, 7 & 8 – Annexations to CSA 54

Area 6 – includes 7 parcels encompassing approximately 0.9 acres and is generally located at the intersection of Seeley Way and Lands End Trail in the Crest Forest community (see Figure 5 below). Area 6 has one (1) light.

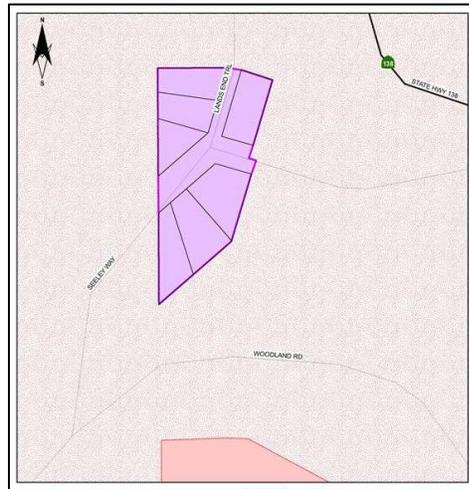


Figure 5 – Area 6: Annexation to CSA 54

Area 7 – encompasses approximately 158.5 acres that include parcels east and west of State Highway 189 between Lake Gregory Drive and Strawberry Lodge in the Crest Forest community (see Figure 6 below). Area 7 has an estimated total of 10 lights.

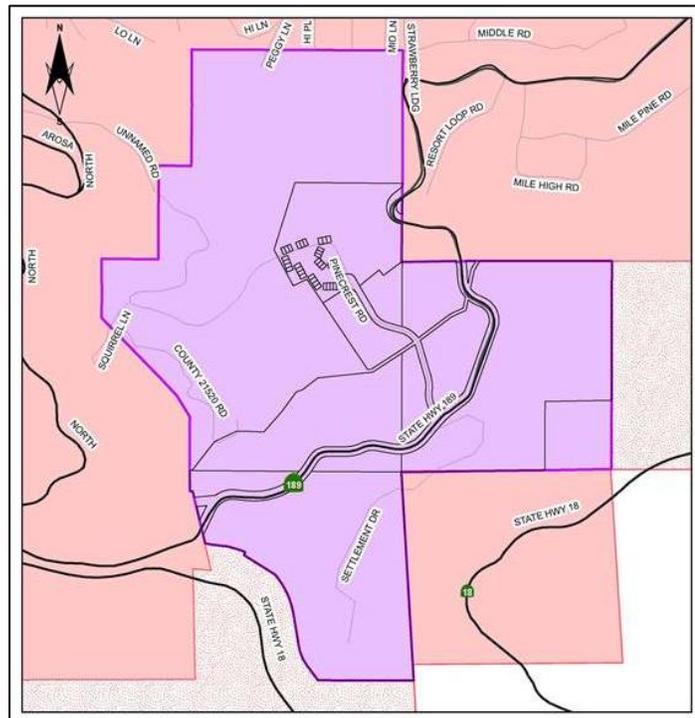


Figure 6 – Area 7: Annexation to CSA 54

Area 8 – includes 4 parcels encompassing approximately 6.65 acres and is generally located at the intersection of State Highway 189 and North Bay Road in the Blue Jay area of the Lake Arrowhead community (see Figure 7 below). Area 8 has one (1) light.

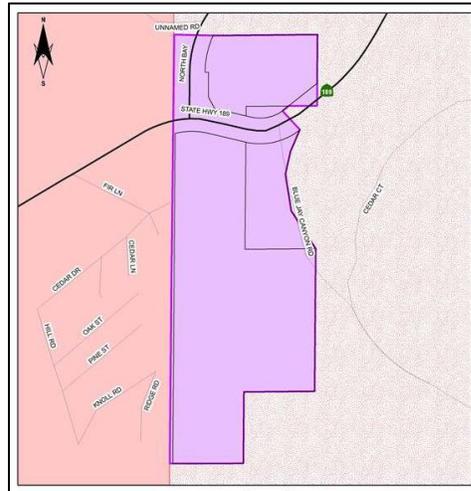


Figure 7 – Area 8: Annexation to CSA 54

For the one streetlight in Running Springs (see Figure 8 below for location), as discussed earlier, LAFCO staff is recommending that the Special Districts Department either transfer the said streetlight to another entity, or if no entity is willing to accept responsibility for the light, the streetlight should be turned-off.

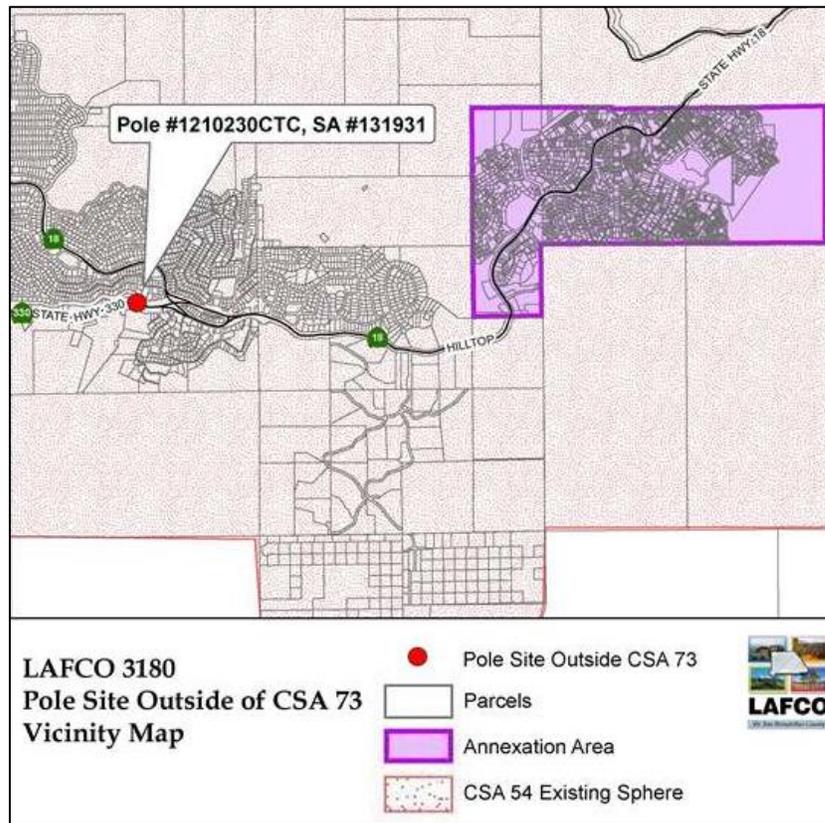


Figure 8 – Location of Streetlight in Running Springs Area

Therefore, the reorganization proposal as modified, presents no boundary concerns since it addresses the consolidation of all the County's streetlighting entities in the mountain region into a single county service area. It includes the dissolution of the two entities that provide streetlighting services (CSAs 53-A and 73), the detachment of the portion of CSA SL-1 that is the only other County streetlighting entity located in the mountain region, the annexation of these areas into CSA 54, including those areas along the periphery of CSA 54.

For these reasons, LAFCO staff supports the reorganization proposal as modified.

LAND USE:

The reorganization proposal is located in the San Bernardino Mountain region. The County designates Area 1, which is within the Lake Arrowhead community, as commercial. Area 2, which is within the Hilltop community, is predominantly designated as residential with portions of the area designated with either commercial, industrial, institutional, and resource conservation land uses. Areas 3, 4, and 5, which are within the Bear Valley community, are primarily designated for resource conservation with the Fawnskin area designated with either residential, commercial, or institutional land uses. Finally, for Areas 6 and 7 (which are within the community of Crest Forest) and Area 8 (which is within the community of Lake Arrowhead), these areas have a residential land use designation assigned to them.

However, the approval of this proposal will have no direct impact on the current County land use designations assigned for these areas. Due to the County's Development Code standards that limit the installation of streetlights in the mountain region as well as its Glare and Outdoor Lighting standards specific to the mountain region, the installation of additional streetlights in the future will be limited. However, approval of LAFCO 3180 will provide for a unified approach in providing streetlighting service within the unincorporated mountain communities.

SERVICE DELIVERY AND FINANCIAL IMPLICATIONS:

CSAs 53-A, 54, and 73 are limited purpose special districts, providing only streetlighting services within its service area. The financial effects of the proposed dissolutions of CSAs 53-A and 73 are that their shares of the ad valorem property tax will be transferred to CSA 54, along with the responsibility for payment of the electricity costs for operation of all the streetlights associated with these districts. The charts below provides a review of the costs and expenses for these districts:

County Service Area 53-A

	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12	FY 2012-13
	Audit	Audit	Audit	Audit	Audit	Audit
REVENUES						
Property Taxes		\$ 32,440	\$ 9,251	\$ 8,594	\$ 8,529	\$ 8,608
Other Taxes		\$ 261	\$ 128	\$ 66	\$ 118	
State Assistance		\$ 106	\$ 111	\$ 117		\$ 114
Investment Earnings		\$ 328	\$ 160	\$ 155	\$ 115	\$ 329
Total Revenues	\$ -	\$ 33,135	\$ 9,650	\$ 8,932	\$ 8,762	\$ 9,051
EXPENDITURES						
Salaries and Benefits		\$ 1,497	\$ 1,260	\$ 1,189	\$ 1,082	\$ 4,253
Services and Supplies		\$ 3,818	\$ 3,776	\$ 4,483	\$ 4,715	\$ 6,040
Total Expenditures	\$ -	\$ 5,315	\$ 5,036	\$ 5,672	\$ 5,797	\$ 10,293
Net Change in Fund Balance	\$ -	\$ 27,820	\$ 4,614	\$ 3,260	\$ 2,965	\$ (1,242)
Fund Balance - Beginning		\$ 9,016	\$ 12,669	\$ 17,282	\$ 20,542	\$ 23,507
Fund Balance - Ending	\$ -	\$ 36,836	\$ 17,283	\$ 20,542	\$ 23,507	\$ 22,265
Footnote:						
1) FY 2009-10 audit restated the Beginning Fund Balance from \$36,836 to \$12,669.						
<i>Beginning fund balance for the major special revenue fund labeled "Streetlights" has been adjusted to correct an error which overstated property taxes in the prior year. The error has an effect on the change in net assets for the year ended June 30, 2009.</i>						
<i>Accordingly, the beginning fund balance and the beginning net assets have been adjusted as follows:</i>						
Fund Balance - beginning, as previously reported			\$ 36,860			
Prior Period Adjustment			\$ (24,191)			
Fund Balance - beginning, as restated			\$ 12,669			

County Service Area 54

	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12	FY 2012-13
	Audit	Audit	Audit	Audit	Audit	Audit
REVENUES						
Property Taxes	\$ 34,146	\$ 36,930	\$ 35,807	\$ 34,941	\$ 33,535	\$ 32,444
Other Taxes	\$ 2,362	\$ 1,029	\$ 511	\$ 262	\$ 448	\$ 420
State Assistance	\$ 442	\$ 428	\$ 4,867	\$ 469	\$ 77	\$ 351
Investment Earnings	\$ 292	\$ 419	\$ 264	\$ 176		
Intergovernmental				\$ 8,980		
Other Revenue				\$ 2,218		
Total Revenues	\$ 37,242	\$ 38,806	\$ 41,449	\$ 47,046	\$ 34,060	\$ 33,215
EXPENDITURES						
Salaries and Benefits	\$ 5,789	\$ 5,641	\$ 5,154	\$ 5,295	\$ 5,035	\$ 5,994
Services and Supplies	\$ 22,869	\$ 31,566	\$ 31,556	\$ 43,188	\$ 26,443	\$ 27,923
Total Expenditures	\$ 28,658	\$ 37,207	\$ 36,710	\$ 48,483	\$ 31,478	\$ 33,917
Net Change in Fund Balance	\$ 8,584	\$ 1,599	\$ 4,739	\$ (1,437)	\$ 2,582	\$ (702)
Fund Balance - Beginning	\$ 9,515	\$ 18,099	\$ 19,698	\$ 24,437	\$ 23,000	\$ 25,582
Fund Balance - Ending	\$ 18,099	\$ 19,698	\$ 24,437	\$ 23,000	\$ 25,582	\$ 24,880

County Service Area 73:

	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12	FY 2012-13
	Audit	Audit	Audit	Audit	Audit	Audit
REVENUES						
Property Taxes	\$ 34,146	\$ 36,930	\$ 35,807	\$ 34,941	\$ 33,535	\$ 32,444
Other Taxes	\$ 2,362	\$ 1,029	\$ 511	\$ 262	\$ 448	\$ 420
State Assistance	\$ 442	\$ 428	\$ 4,867	\$ 469	\$ 77	\$ 351
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Fund Balance - Ending	\$ 18,099	\$ 19,698	\$ 24,437	\$ 23,000	\$ 25,582	\$ 24,880

Below is a summary of the audit data for the three county service areas showing the net change in fund balance and the total fund balance - ending:

AUDIT DATA	FY 2007-08	FY 2008-09	FY 2009-10	FY 2010-11	FY 2011-12	FY 2012-13
Net Change in Fund Balance						
CSA 53-A	\$ -	\$ 27,820	\$ 4,614	\$ 3,260	\$ 2,965	\$ (1,242)
CSA 54	\$ 8,584	\$ 1,599	\$ 4,739	\$ (1,437)	\$ 2,582	\$ (702)
CSA 73	\$ 1,433	\$ (334)	\$ (280)	\$ (1,587)	\$ (259)	\$ (179)
Total Net Change in Fund Balance (Mtn Region Streetlighting)	\$ 10,017	\$ 29,085	\$ 9,073	\$ 236	\$ 5,288	\$ (2,123)
AUDIT DATA						
Fund Balance - Ending						
CSA 53-A	\$ -	\$ 36,836	\$ 17,283	\$ 20,542	\$ 23,507	\$ 22,265
CSA 54	\$ 18,099	\$ 19,698	\$ 24,437	\$ 23,000	\$ 25,582	\$ 24,880
CSA 73	\$ 1,621	\$ 1,287	\$ 1,007	\$ 473	\$ 214	\$ 35
Total Fund Balance - Ending (Mtn Region Streetlighting)	\$ 19,720	\$ 57,821	\$ 42,727	\$ 44,015	\$ 49,303	\$ 47,180

In processing the application materials, LAFCO staff had a hard time verifying the information provided by the Southern California Edison (Edison) regarding the streetlights for the districts. There were some instances where the information provided on paper did not match the actual information on the ground (i.e. streetlights on paper were not present on the ground or vice versa). Especially with the funding constraints associated with these districts, LAFCO staff is recommending that the Special Districts department do an accounting of all the streetlights that are being paid for by these districts.

As the successor agency to the operations for CSAs 53-A and 73, CSA 54 will receive the full fund balance from CSA 53-A and CSA 73. Therefore, staff is recommending the

inclusion of conditions of approval to outline this transfer as well as one related to appropriation limit consolidation as follows:

- **As successor agency for County Service Areas 53-A and 73, County Service Area 54 will receive all property tax revenues attributable to both entities per the County Board of Supervisors' Resolution No. 2014-58. In addition, any and all other collections or assets for both County Service Areas 53-A and 73 shall accrue and be transferred to County Service Area 54.**
- **The appropriation limit currently assigned to County Service Areas 53A and 73, shall be added to that of County Service Area 54.**

As a condition of approval, the County, on behalf of CSA 54, will be required to sign the documents necessary to accept the obligation for operation of the streetlights currently funded by CSA 53A, CSA 73, and the portion of CSA SL-1 being detached and transferred to CSA 54. The conditions shall read as follows:

- **As a function of the dissolution of County Service Area 53A, all streetlights currently the responsibility of County Service Area 53A shall be transferred to County Service Area 54. The County Special Districts Department shall sign the authorization form requesting Bear Valley Electric to transfer the streetlights to County Service Area 54 upon successful completion of the reorganization.**
- **As a function of the dissolution of County Service Area 73, all streetlights currently the responsibility of County Service Area 73 shall be transferred to County Service Area 54. The County Special Districts Department shall sign the authorization form requesting Southern California Edison to transfer the streetlights to County Service Area 54 upon successful completion of the reorganization.**
- **As a function of the detachment of the portion of County Service Area SL-1 in the Lake Arrowhead area, all streetlights currently within said portion of County Service Area SL-1 shall be transferred to County Service Area 54. The County Special Districts Department shall sign the authorization form requesting Southern California Edison to transfer the streetlights to County Service Area 54 upon successful completion of the reorganization.**

Therefore, upon the effective date of the reorganization, CSA 54 will succeed to maintaining and operating all lights currently funded by CSA 53-A, CSA 73, and the portion of CSA SL-1 being detached and transferred to CSA 54.

As required by Commission policy and State law, the plan for service submitted by the County Special Districts Department indicates that the extension of services within the reorganization area will maintain current service levels provided through the County and its special districts. In addition, the 5-year projection submitted by the County also indicates that the

reorganization will allow CSA 54 to continue to provide streetlighting services in the mountain region at current level of service.

ENVIRONMENTAL CONSIDERATIONS:

As the CEQA lead agency, the Commission's Environmental Consultant, Tom Dodson from Tom Dodson and Associates, has indicated that the review of LAFCO 3180 is statutorily exempt from the California Environmental Quality Act (CEQA). This recommendation is based on the finding that the Commission's approval of the reorganization has no potential to cause any adverse effect on the environment. The reorganization proposal will support existing streetlights by consolidating the entities into a single county service area to oversee long-term management of existing and/or future streetlighting in the mountain region. Therefore, the proposal is exempt from the requirements of CEQA, as outlined in the State CEQA Guidelines, Section 15061 (b)(3). A copy of Mr. Dodson's analysis is included as Attachment #3 to this report.

CONCLUSION:

The primary purpose of the reorganization was to consolidate streetlighting services within the entire mountain region into a single county service area to reduce indirect costs (administrative and other overhead charges) while maintaining the current level of service.

Staff supports approval of LAFCO 3180 for the following reasons:

- The reorganization accomplishes the County's goal to consolidate all of the County's mountain region streetlighting service providers into a single county area; and,
- Through the reorganization, there is the potential to reduce indirect costs and continue to maintain the current level of service.

For these reasons, and those outlined throughout the staff report, the staff supports the approval of LAFCO 3180.

DETERMINATIONS:

The following determinations are required to be provided by Commission policy and Government Code Section 56668 for any change of organization/reorganization proposal:

1. The County Registrar of Voters Office has determined that the reorganization area is legally inhabited, containing 774 registered voters as of April 29, 2014 (for Areas 1 thru 5) and subsequently on October 14, 2014 (for Areas 6 thru 8).

Area 1 -- 6 registered voters
Area 2 -- 387 registered voters
Area 3 -- 376 registered voters
Area 4 -- 5 registered voters
Area 5 -- 0 registered voters
Area 6 -- registered voters

Area 7 -- registered voters
Area 8 -- registered voters

2. The County Assessor has determined that the total assessed value of land and improvements within the reorganization area is \$328,576,853. The breakdown of assessed value of land and improvements for each of the eight separate areas are as follows:

Area 1 -- \$	3,646,663	(land - \$	1,103,369; improvements - \$	2,543,294)
Area 2 -- \$	93,313,285	(land - \$	24,543,752; improvements - \$	68,769,533)
Area 3 -- \$	217,322,556	(land - \$	100,408,660; improvements - \$	116,913,896)
Area 4 -- \$	1,428,899	(land - \$	167,462; improvements - \$	1,261,437)
Area 5 -- \$	0	(land - \$	0; improvements - \$	0)
Area 6 -- \$	519,870	(land - \$	82,285; improvements - \$	437,585)
Area 7 -- \$	13,774,479	(land - \$	2,606,929; improvements - \$	11,167,550)
Area 8 -- \$	0	(land - \$	0; improvements - \$	0)

3. The reorganization area is within the sphere of influence assigned for County Service Area 54 through approval of LAFCO 3179.
4. Notice of Commission review of this proposal has been advertised in *The Sun*, a newspaper of general circulation within the reorganization area. Individual notice has been provided to affected and interested agencies, County departments, and those individuals and agencies having requested such notification. Comments received have been reviewed and considered by the Commission in making its determination.

In addition, individual notice of the original May 21, 2014 LAFCO hearing was provided to landowners and registered voters within the original area for LAFCO 3180 (totaling 3,811 notices).

5. The County's land use designations for the reorganization area include a mix of residential, commercial, industrial, institutional, and resource conservation.

Pursuant to the provision of Government Code Section 56668(g), this reorganization proposal has no direct effect on the Southern California Associated Governments (SCAG) adopted Regional Transportation Plan and Sustainable Community Strategy nor does it have any direct effect on the County's General Plan land use designations assigned for the area.

6. The Commission's Environmental Consultant, Tom Dodson and Associates, has recommended that this proposal is statutorily exempt from environmental review based on the finding that the Commission's approval of the reorganization has no potential to cause any adverse effect on the environment; and therefore, the proposal is exempt from the requirements of CEQA, as outlined in the State CEQA Guidelines, Section 15061 (b)(3). Mr. Dodson recommends that the Commission adopt the Statutory Exemption and direct its Executive Officer to file a Notice of

Exemption within five (5) days. A copy of Mr. Dodson's response letter is included as Attachment #3 to this report.

8. The areas within the reorganization area are served, in whole or in part, by the following local agencies:

- County of San Bernardino
- Inland Empire Resource Conservation District
- Mojave Desert Resource Conservation District
- San Bernardino County Fire Protection District and its Mountain Service Zone
- Crestline-Lake Arrowhead Water Agency
- Rim of the World Recreation and Park District
- Lake Arrowhead Community Services District
- Crestline Village Water District
- Crestline Sanitation District
- Crest Forest Fire Protection District
- Arrowbear Park County Water District
- San Bernardino Mountains Community Healthcare District
- Big Bear Lake Fire Protection District
- Big Bear Municipal Water District
- Big Bear Valley Recreation and Park District
- Big Bear Airport District
- Bear Valley Community Healthcare District
- County Service Area SL-1 (Lake Arrowhead portion)
- County Service Area 73
- County Service Area 53
- County Service Area 53 Zone A
- County Service Area 53 Zone B
- County Service Area 53 Zone C
- County Service Area 54
- County Service Area 70 Zone D-1
- County Service Area 70 (multi-function)

The agencies directly affected by this proposal are County Service Area 53 Zone A, County Service Area 54, County Service Area 73, and County Service Area SL-1. None of the other agencies will be affected by this proposal.

9. The County of San Bernardino, through its Special Districts Department, has submitted a plan for services for the provision of streetlighting services through County Service Area 54. This plan is attached for Commission review, and it indicates that the range and level of such services can be maintained following the reorganization.
10. The area in question can benefit, and has benefited, from the provision of streetlighting services and will continue to do so following the transfer of responsibility to County Service Area 54 as outlined in the plan for services at current service levels.

11. This reorganization proposal and its anticipated effects conform with adopted Commission policies and directives of state law that promote the simplification of the government.
12. Pursuant to the provision of Government Code Section 56668(o), the reorganization proposal to consolidate streetlighting services within the entire mountain region will not result in the unfair treatment of any person, based upon race, culture or income.
13. The County Board of Supervisors has successfully concluded the property tax negotiations required by Section 99 of the Revenue and Taxation Code.
14. The map and legal description, as revised, are in substantial compliance with LAFCO and State standards through certification by the County Surveyor's Office.

KRM/sm

Attachments:

1. [Maps—Vicinity and Location](#)
2. [Application including Board of Supervisors Resolution](#)
3. [Response from the Commission's Environmental Consultant, Tom Dodson and Associates, on Environmental Determination](#)
4. [Draft LAFCO Resolution #3192](#)