

LOCAL AGENCY FORMATION COMMISSION FOR SAN BERNARDINO COUNTY

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DATE: NOVEMBER 7, 2017 
FROM: KATHLEEN ROLLINGS-McDONALD, Executive Officer
SAMUEL MARTINEZ, Assistant Executive Officer
TO: LOCAL AGENCY FORMATION COMMISSION

SUBJECT: **Agenda Item #6:** LAFCO 3207 – Reorganization to include City of Redlands Annexation No. 94 and Detachments from San Bernardino County Fire Protection District and its Valley Service Zone, and County Service Area 70 and its Zone P-7 (Sam-Redlands, LLC)

INITIATED BY:

Property Owner Petition – Sam Redlands, LLC, property owner

RECOMMENDATION:

The staff recommends that the Commission approve LAFCO 3207 by taking the following actions:

1. Modify LAFCO 3207 to expand the proposed reorganization area to include the full right-of-way easement of Sylvan Boulevard in order to give the City full maintenance responsibility for that portion of Sylvan Boulevard adjacent to Tentative Tract Map 19942;
2. With respect to environmental review:
 - a) Certify that the Commission, its staff, and its Environmental Consultant have independently reviewed and considered the City's Initial Study and Mitigated Negative Declaration for Annexation No. 94, Zone Change No. 565, Tentative Tract Map No. 19942, and Demolition Permit No. 258, including the Addendum prepared by LAFCO's Environmental Consultant;
 - b) Determine that the Addendum, together with the City's environmental assessment, are adequate for the Commission's use as a CEQA Lead Agency for its consideration of LAFCO 3207;

- c) Adopt the Addendum, as presented by the Commission’s Environmental Consultant, that addresses the inclusion of the entire right-of-way area within Sylvan Boulevard as part of the overall reorganization;
 - d) Determine that the Commission does not intend to adopt alternatives or additional mitigation measures for the project; that the mitigation measures identified in the City’s environmental document are the responsibility of the City and/or others, not the Commission; and,
 - d) Direct the Executive Officer to file the Notice of Determination within five (5) days and find that no further Department of Fish and Wildlife filing fees are required by the Commission’s approval of LAFCO 3207 since the City of Redlands has paid said fees for its environmental determination.
2. Approve LAFCO 3207, as modified, with the standard LAFCO terms and conditions that include the “hold harmless” clause for potential litigation costs by the applicant, the extension of existing special taxes, and the continuation of fees, charges, and/or assessments currently authorized by the annexing agency.
 3. Waive protest proceedings, as permitted by Government Code Section 56662(d), with 100% landowner consent to the reorganization; and,
 4. Adopt LAFCO Resolution #3253 setting forth the Commission’s determinations and conditions of approval concerning the reorganization proposal and issue said resolution upon receipt of the revised map and legal description, prepared in compliance with LAFCO and State standards, that reflects the modified boundary for the reorganization proposal.

BACKGROUND:

In February 2016, Patrick Meyer, representative for the property owner—both the original property owner, The Holy Name of Jesus Catholic Community, Inc. and the current owner, Sam-Redlands, LLC—submitted a property owner petition initiating the change or organization and the application materials requesting annexation to the City of Redlands (hereafter the “City”). The reorganization proposal includes the detachment from the San Bernardino County Fire Protection District (SBCFPD) and its Valley Service Zone as well as detachment from County Service Area (CSA) 70 and CSA 70 Zone P-7. CSA 70 Zone P-7 is an inactive entity that was created by the County in 1991 to provide park and recreation services for the unincorporated Mentone/Crafton community. The processing of the application was held until such time as the pre-zoning and environmental assessment process by the City of Redlands was conducted completing the application submission requirements.

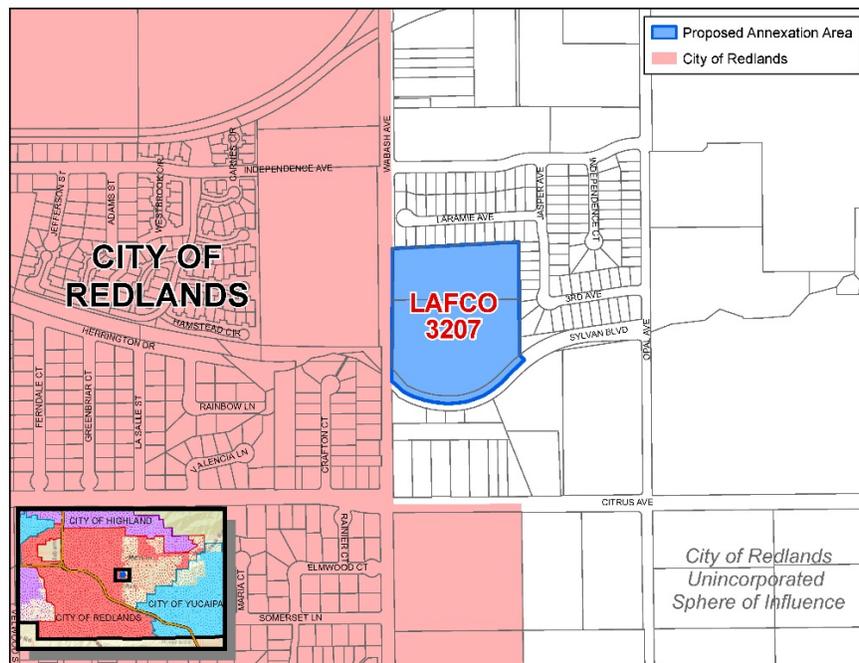
The primary reason for the annexation request, as outlined in the application materials (included as part of Attachment #2), is to receive municipal services, particularly water

and sewer service, from the City for the proposed Tentative Tract Map (TTM) 19942, a proposed development of 34 single-family residences and four lettered lots that is being proposed on the site. Since the property is contiguous to the City along Wabash Avenue, the delivery of water and sewer service to the site is contingent upon annexation. As the Commission is well aware, this is a requirement of the City's "Measure U", which was approved by its voters in 1997 and is outlined in Chapter 13.60.030 of the City's Municipal Code (included as Attachment #3 to this report).

This report will provide the Commission with the information required to make the determinations necessary within the four major areas of consideration required for a jurisdictional change – boundaries, land uses, service issues and the effects on other local governments, and environmental considerations.

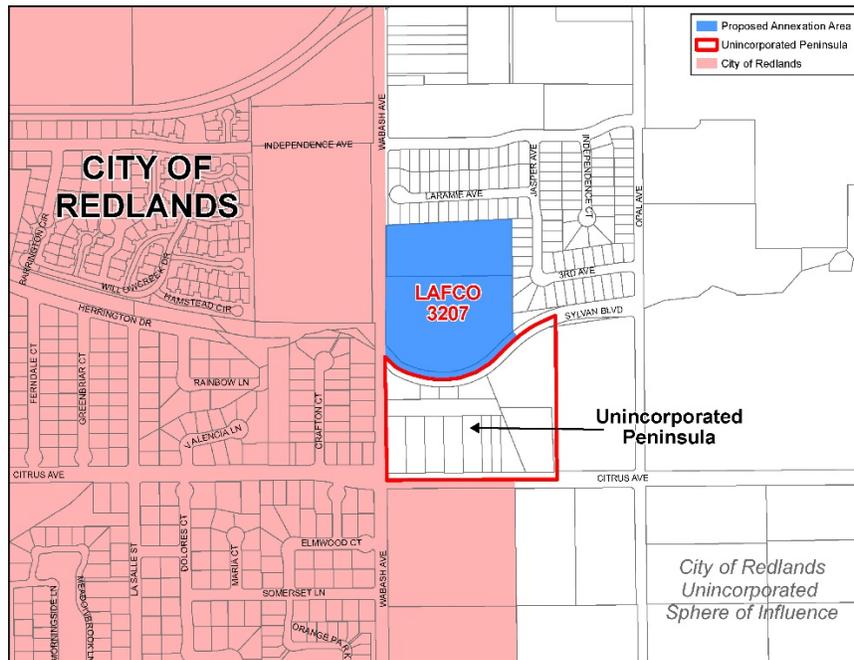
BOUNDARIES:

As shown on the map below, the actual site for development of TTM 19942 includes two parcels, APNs 0299-011-11 and 0299-011-12, encompassing 12 +/- acres, generally located east of Wabash Avenue and north of Sylvan Boulevard. The study area is bounded by parcels lines on the north and east, Sylvan Boulevard on the south, and Wabash Avenue (existing City of Redlands boundary) on the west. The reorganization area is within the City of Redlands' northeastern sphere of influence, which is commonly known as the Mentone community. Location and vicinity maps are included as Attachment #1 to this report.



Boundary Issue:

In the past, the Commission has expressed its concern regarding the piecemeal approach to annexations in the Mentone/Crafton communities caused by the implementation of Measure U and directed staff to review the expansion of any proposal submitted to create a more logical and efficient boundary. For this particular annexation, it was LAFCO staff's position that it would be ideal to expand the proposal to include the unincorporated peninsula located between the current proposal and the area that was recently annexed into the City located south of Citrus Avenue (LAFCO 3195).



In order to gauge if expansion was a viable option, LAFCO staff conducted a survey, sending a letter and survey form (sample letter and survey form included as Attachment #4 to this report), to all property owners (15 total) and registered voters (24 total) within the unincorporated peninsula shown above. All 13 responses that were received responded in the negative to both questions on the survey form.

Therefore, based on the responses received from the survey, staff believes that the reorganization proposal cannot be expanded without risking termination as the inclusion would render it legally inhabited with the voters ultimately deciding the issue. In the event the proposal is terminated, TTM 19942 cannot be developed since Measure "U" requires annexation of contiguous property in order to connect to the City's water and sewer facilities. As a result, approval of the proposal by the Commission will create a peninsula of unincorporated territory between the City's existing boundary and LAFCO 3207. The concern surrounding the creation of the peninsula is somewhat tempered by the understanding that this area already receives water service from the City and the full

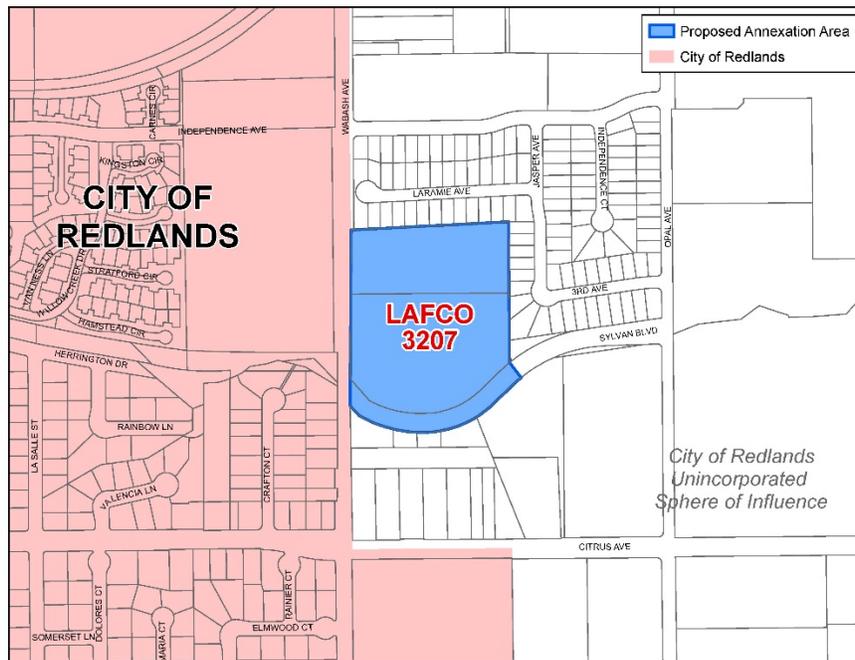
width of Wabash Avenue in within the boundary of the City of Redlands for maintenance as more fully outlined below.

LAFCO Staff's Proposed Modification:

On previous city annexations, the County's Department of Public Works (DPW) has expressed an on-going concern that the piecemeal annexation along Wabash Avenue creates starts and stops in road maintenance that leads to confusion and disruption for service providers.

Since LAFCO 3207 cannot be expanded, in order to respond to the concerns of the County's DPW, staff initially thought of recommending that the Commission expand the reorganization boundary to include the entire road width of Wabash Avenue between Sylvan Boulevard and Citrus Avenue. After reviewing with the County Surveyor's Office the City's boundaries along Wabash Avenue and identifying options to address maintenance responsibilities along Wabash Avenue, it was identified that the actual boundaries of the City already includes the current 30-foot easterly right-of-way area between Sylvan Boulevard and Citrus Avenue resolving the question on maintenance in this area.

However, the County's DPW, in its letter to LAFCO dated November 2, 2017, recommends that the proposal include the full width of the right-of-way easement for Sylvan Boulevard that is adjacent to the proposal area (see Attachment #5 to this report). Therefore, LAFCO staff is modifying the reorganization boundary to include the full width of the right-of-way easement for Sylvan Boulevard adjacent to TTM 19942.



Although not an ideal boundary configuration, it is LAFCO staff's position that the reorganization proposal, as modified, allows a mechanism for TTM 19942 to be annexed for the services it requires and also provides the City full responsibility for the entire easement of Sylvan Boulevard adjacent to TTM 19942, which are easily identifiable boundaries.

LAFCO staff continues to encourage the County and the City to work together to develop a contractual framework for future road maintenance within the City's eastern sphere of influence area where they share a boundary in order to provide a comprehensive approach for this service. Such a contract would allow for the ability to exchange maintenance responsibilities in certain stretches of a roadway in order to alleviate any road maintenance issues in the future.

LAND USE:

The existing use on the properties associated with TTM 19942 is a mix of a couple of structures (proposed to be demolished) some cleared open area and a section with citrus groves. Existing uses directly surrounding the area include single family residential development to the north and east, a combination of Sylvan Boulevard and the Mill Creek Zanja (flood control easement) including a few residential developments to the south, and single-family residential development and an elementary school (Crafton Elementary School) to the west along Wabash Avenue (within the City of Redlands).

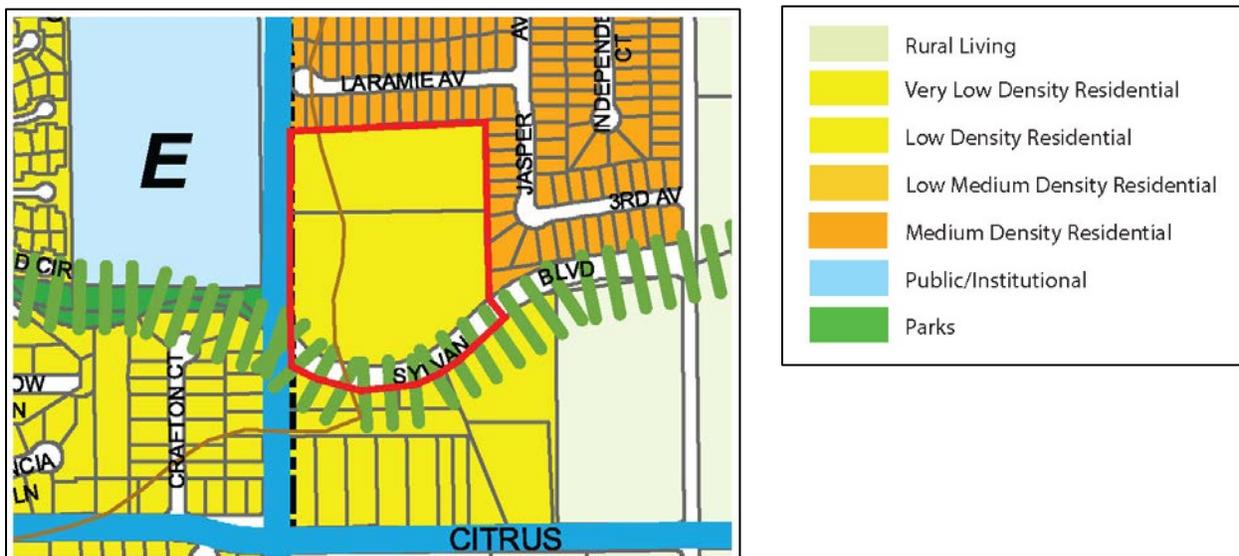


County Land Use Designation:

The County's current land use designation for the reorganization area is RL-5 (Rural Living, 5 acre minimum), which provides sites for rural residential uses and incidental agricultural uses.

City's General Plan:

The City's General Plan land use designation for the reorganization area is Low Density Residential, which allows for single family residential development at 0 – 6.0 units per gross acre. It should also be noted that the portion of Sylvan Boulevard adjacent to the reorganization area has a Linear Park designation assigned to it.



City's Pre-Zone Designation:

The City of Redlands pre-zoned the reorganization area R-1 (Single Family Residential District). This pre-zone designation was determined through the City's consideration of Ordinance No. 2846, which was adopted on April 4, 2017. TTM 19942, which is proposed for development of 34 lots, has a total density below 3.0 dwelling units per acre.



This land use designation is consistent with the City's General Plan Low Density Residential land use classification for the area. Pursuant to the provisions of Government Code Section 56375(e), this zoning designation shall remain in effect for a period of two (2) years following annexation unless the City Council makes the finding at a public hearing that a substantial change has occurred in circumstance that necessitates a departure from the pre-zoning outlined in the application made to the Commission.

Conversion of Agricultural Land

Approximately 5.5 acres of the overall 11.97 acres associated with TTM 19942 remains as a citrus grove. The rest of the area was cleared to establish an equipment yard. The California Department of Conservation designates the portion of the site where groves have been removed for the previous equipment yard as "Urban and Built-Up Land". However, the area to the south where the remaining citrus grove exists is designated as "Prime Farmland."

One of the main tenets of LAFCO Law is the preservation of open-space and prime agricultural lands. The site has an existing agricultural use representing a fragmented citrus grove. Therefore, the proposed development anticipated for LAFCO 3207—which is proposed for 34 single-family residences—is anticipated to convert prime farmland to non-agricultural use.

When considering a proposal with agricultural conversion, Government Code Section 56377 requires that the Commission consider policies and priorities regarding such conversion of existing lands by: 1) steering away from agricultural conversion unless the proposal “would not promote the planned, orderly, efficient development of an area”, and 2) encourage the development of existing vacant or non-prime agricultural lands for urban uses within the existing jurisdiction or within the sphere of influence of the local agency before any proposal is approved that would allow for the development of existing open-space lands for non-open-space uses outside the existing jurisdiction.

First, LAFCO 3207 does promote the planned, orderly efficient development of the area since the proposal area is currently designated for residential development and is surrounded by existing residential development within the City of Redlands and within the unincorporated County area. Secondly, although the development will convert prime farmland to a non-agricultural use, the area is already within the sphere of influence for the City of Redlands, and has been within its sphere of influence for many years. Based upon these determinations, the conversion of prime farmland for the proposed development can be justified based on the San Bernardino LAFCO directives and priorities related to farmland conversion.

In addition, it should be noted that a mitigation measure (Mitigation Measure AGR-1) is included in the City’s approval of TTM 19942 to ensure potential impacts to farmland are reduced to less than significant levels. That mitigation measure reads as follows:

“AGR-1 The project developer will fund acquisition of farmland or farmland conservation easements at a ratio of 0.50/1. Based on the 5.5 agricultural acre area of the 11.97 acre project site, a total of 2.75 acres of prime agricultural land or conservation easements over 2.75 acres of prime agricultural land shall be acquired and permanently protected. The prime agricultural land or the conservation easement shall be acquired and made available to an existing farmland trust or comparable organization prior to issuance of a grading permit, or a farmland trust or comparable organization shall verify that it has received sufficient funds to acquire prime agricultural land or a conservation easement over such lands. The project developer shall submit verification to the City of Redlands Development Services Department that the acquisition of farmland has been completed. A receipt from the farmland conservation agency will serve as adequate verification.”

As discussed with the Commission in the past, the implementation of this type of mitigation measure is the responsibility of the City. However, staff’s understanding of

the process is that the acquisition of farmland or a farmland conservation easement will have to be made available to an appropriate farmland trust/mitigation bank. In turn, verification will be submitted to the City from the farmland trust/mitigation bank that lands have been acquired or sufficient funds have been received to acquire said farmland or farmland conservation easement. This is the only way that the mitigation monitoring report will verify the completion and allow the development to proceed.

SERVICE ISSUES AND EFFECTS ON OTHER LOCAL GOVERNMENTS:

In every consideration for jurisdictional change, the Commission is required to look at the existing and proposed service providers within an area. Current County service providers within the reorganization area include the San Bernardino County Fire Protection District (SBCFPD) and its Valley Service Zone, CSA 70 (multi-function entity) and Zone P-7 of CSA 70 (park and recreation), which are all proposed to be detached as a function of the reorganization. In addition, the following regional entities overlay the reorganization area: Inland Empire Resource Conservation District, the San Bernardino Valley Water Conservation District, and the San Bernardino Valley Municipal Water District (the State Water Contractor), which are unaffected by this action.

The City has prepared a Plan for Service as required by law and Commission policy (included as part of Attachment #2). The Plan for Service also includes a Fiscal Impact Analysis indicating that the project will have a positive financial effect for the City. In general, the Plan identifies the following:

- Fire protection is currently provided by County Fire and its Valley Service Zone and would be replaced by the City of Redlands Fire Department upon annexation.

The City has included LAFCO 3207 in the Automatic Aid Agreement between the City and County Fire (Agreement No. 06-435). The agreement identifies that County Fire will provide “first response” within the area as identified in the amended Agreement (included as part of Attachment #2).

Paramedic services are currently funded within the City through a special paramedic tax assessment. Approval of the reorganization will include the extension of the annual \$40 special tax to the existing parcels and ultimately the proposed 34 residential units.

- Law enforcement responsibilities will shift from the San Bernardino County Sheriff’s Department to the City of Redlands Police Department.
- Sewage collection services will be provided by the City of Redlands. Upon annexation, sewer service will be extended to the proposed development. The developer will be required to construct all new wastewater pipelines within the project and connect to the existing sewer main in Wabash Avenue. In addition,

the developer will pay capital improvement fees (sewer capacity fee) of approximately \$106,420 (see Attachment A to the Plan for Service).

- Water service will be provided by the City of Redlands and has been provided to the existing structures on the site. Upon annexation, water service will be extended to the proposed development. The developer will be required to construct all new water mains within the project and connect to the existing water main in Wabash Avenue. In addition, the developer will be required to pay the water frontage, water source acquisition and water capital improvement fees totaling approximately \$203,010 (see Attachment A to the Plan for Service).
- Solid waste services are currently provided by Empire Disposal (Burrtec Waste Industries) within the reorganization area, which will transfer to the City of Redlands through its Quality of Life Department upon completion of the reorganization.

As required by Commission policy and State law, the Plan for Service shows that the extension of the City's services will maintain, and/or exceed, current service levels provided through the County with the completion of the amendment to the Automatic Aid Agreement.

ENVIRONMENTAL CONSIDERATIONS:

The City of Redlands prepared an environmental assessment and Mitigated Negative Declaration for Annexation No. 94, Zone Change No. 565, Tentative Tract Map No. 19942, and Demolition Permit No. 258. However, LAFCO staff has expanded the reorganization area to now include the full right-of-way easement of Sylvan Boulevard adjacent to the proposal area. In light of this, the Commission's Environmental Consultant, Tom Dodson and Associates, prepared an Addendum to the City's environmental assessment that addresses the additional right-of-way area. Mr. Dodson has determined that if the Commission approves LAFCO 3207, the Addendum, together with the City's environmental assessment, are adequate for the Commission's use as a lead agency under CEQA.

Mr. Dodson has indicated that the necessary environmental actions to be taken by the Commission are as follows:

- a) Certify that the Commission, its staff, and its Environmental Consultant have independently reviewed and considered the City's environmental assessment and Mitigated Negative Declaration, including the Addendum prepared by LAFCO's Environmental Consultant;
- b) Determine that the Addendum, together with the City's environmental assessment, are adequate for the Commission's use as a CEQA Lead Agency for its consideration of LAFCO 3207;

- c) Adopt the Addendum, as presented by the Commission’s Environmental Consultant, that addresses the inclusion of the entire right-of-way area within Sylvan Boulevard adjacent to TTM 19942 as part of the overall reorganization area;
- d) Determine that the Commission does not intend to adopt alternatives or additional mitigation measures for the project; that the mitigation measures identified in the City’s environmental document are the responsibility of the City and/or others, not the Commission; and,
- d) Direct the Executive Officer to file the Notice of Determination within five (5) days and find that no further Department of Fish and Wildlife filing fees are required by the Commission’s approval of LAFCO 3207 since the City of Redlands has paid said fees for its environmental determination.

WAIVER OF PROTEST PROCEEDINGS:

The reorganization area is legally uninhabited (as determined by the Registrar of Voters office) and LAFCO staff verified that the study area possesses 100% landowner consent to the annexation. Therefore, if the Commission approves LAFCO 3207 and none of the affected agencies have submitted written opposition to a waiver of protest proceedings, staff is recommending that protest proceedings be waived. The actions would include direction to the Executive Officer to complete the reorganization following completion of the mandatory reconsideration period of 30-days.

CONCLUSION:

LAFCO 3207 was submitted in order to allow the property owner, who is proposing development of Tentative Tract Map 19942, a 34 single-family residential community, which requires receipt of municipal services—particularly water and sewer service—which is only available from the City of Redlands. LAFCO staff supports the reorganization proposal since the City’s Municipal Code clearly states that all projects that are contiguous to the City’s boundaries must annex prior to receiving water and sewer service and the application responds to this requirement.

For these reasons, and those outlined throughout the staff report, the staff supports the approval of LAFCO 3207.

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 Registrar of Voters Office has certified that the reorganization area is legally uninhabited, containing no registered voter as of October 11, 2017.
2. The County Assessor has determined that the total assessed value of land and improvements within the reorganization area on the secured assessment roll is \$1,232,377 (land - \$997,848 -- improvements - \$234,529).
3. The reorganization area is within the sphere of influence assigned the City of Redlands, within the Mentone community.
4. 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.
5. LAFCO has provided individual notices to landowners and registered voters surrounding the reorganization area (totaling 594 notices) in accordance with State law and adopted Commission policies. To date, no written comments in support or opposition have been received regarding the consideration of this proposal. Comments from registered voters and landowners and any affected local agency in support or opposition will be reviewed and considered by the Commission in making its determination.
6. The City of Redlands has pre-zoned the reorganization area R-1 (Single Family Residential District). This zoning designation is consistent with the City's General Plan and is generally compatible with the surrounding land uses in the area. Pursuant to the provisions of Government Code Section 56375(e), this zoning designation shall remain in effect for two years following annexation unless specific actions are taken by the City Council.
7. The Southern California Associated Governments (SCAG) adopted its 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy pursuant to Government Code Section 65080. The closest highway to LAFCO 3207 is the I-10 Freeway, which is part of the RTP-SCS's State highway improvement (expansion/rehabilitation) program adding express lanes and adding high-occupancy vehicle (HOV) lane in each direction.

The Sustainable Communities Strategy includes strategies, among others, that support housing development. Approval of LAFCO 3207 supports this strategy.
8. The Commission's Environmental Consultant, Tom Dodson and Associates, has reviewed the City's Initial Study and Mitigated Negative Declaration for Annexation No. 94, Zone Change No. 565, Tentative Tract Map No. 19942, and Demolition Permit No. 258. In addition, Mr. Dodson prepared an Addendum to the City's environmental assessment to address the inclusion of the entire right-of-way areas within Sylvan Boulevard adjacent to TTM 19942 as part of the

overall reorganization area. Mr. Dodson recommends that, if the Commission approves the proposal, the Addendum together with the City's environmental assessment, are adequate for the Commission's review of the reorganization proposal as lead agency. A copy of the Addendum and the City's environmental assessment are included as Attachment #6 to this report.

9. The reorganization area is presently served by the following local agencies:

- County of San Bernardino
- San Bernardino Valley Municipal Water District
- San Bernardino Valley Water Conservation District
- Inland Empire Resource Conservation District
- San Bernardino County Fire Protection District (SBCFPD)
- SBCFPD Valley Service Zone (fire protection)
- County Service Area 70 (multi-function unincorporated area Countywide)
- County Service Area 70 Improvement Zone P-7 (inactive park and recreation district within the Mentone community)

The proposal will detach the territory from the San Bernardino County Fire Protection District and its Valley Service Zone, County Service Area 70 and its Zone P-7 as a function of the reorganization. None of the other agencies are affected by this proposal as they are regional in nature.

10. A plan was prepared for the extension of services to the reorganization area, as required by law. The Plan for Service and the Fiscal Impact Analysis indicates that the City can maintain and/or improve the level and range of services currently available in the area. A copy of this plan is included as a part of Attachment #2 to this report. The Plan for Service and Fiscal Impact Analysis have been reviewed and compared with the standards established by the Commission and the factors contained within Government Code Section 56668. The Commission finds that the Plan for Service and the Fiscal Impact Analysis, conform to those adopted standards and requirements.
11. The reorganization proposal complies with Commission policies that indicate the preference for areas proposed for development at an urban-level land use to be included within a City so that the full range of municipal services can be planned, funded, extended and maintained. In addition, the reorganization proposal is a logical conversion of prime farmland to non-agricultural use as the proposal area is currently designated for residential development and is surrounded by existing residential development within the City of Redlands and within the unincorporated County area and has been within the City's sphere of influence for many years.

However, the approval of this proposal will create a peninsula of unincorporated territory between the City's existing boundary and LAFCO 3207. Based on the responses received from property owners and registered voters within the

unincorporated peninsula they do not support their annexation to the City. Since the modification would transition the proposal to legally inhabited, the proposal cannot be expanded to eliminate the peninsula area without the risk of terminating LAFCO 3207.

12. The reorganization area can benefit from the availability and extension of municipal services from the City of Redlands.
13. This proposal will assist in the City’s ability to achieve its fair share of the regional housing needs since the reorganization area is being developed with 34 single-family residences.
14. With respect to environmental justice, which is the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services, the following demographic and income profile was generated using ESRI’s Community Analyst within the City of Redlands and within and around the reorganization area, generally the Crafton and Mentone community (2016 data):

| Demographic and Income Comparison | City of Redlands (%) | Subject Area & adjacent Unincorporated Sphere (%) |
|-----------------------------------|----------------------|---|
| Race and Ethnicity | | |
| • African American Alone | 5.2 % | 4.9 % |
| • American Indian Alone | 0.9 % | 1.4 % |
| • Asian Alone | 8.8 % | 4.4 % |
| • Pacific Islander Alone | 0.4 % | 0.4 % |
| • Hispanic Origin (Any Race) | 34.2 % | 39.2 % |
| Median Household Income | \$67,193 | \$55,775 |

Many of the properties within City’s unincorporated sphere area already receive water and/or sewer service from the City through out-of-agency service agreements. Therefore, the reorganization area will benefit from the extension of services and facilities from the City and, at the same time, the approval of the reorganization would not result in the deprivation of service or the unfair treatment of any person based on race, culture or income. However, the City’s policies require annexation if properties needing services are contiguous to the City’s boundary. Therefore, in such case, annexation is the only option before water and/or sewer service can be extended.

15. The County of San Bernardino and the City of Redlands have successfully negotiated a transfer of property tax revenues that will be implemented upon completion of this reorganization. This fulfills the requirements of Section 99 of the Revenue and Taxation Code.

16. The map and legal description, as proposed for revision, will be prepared in substantial compliance with LAFCO and State standards through certification by the County Surveyor's Office.

KRM/sm

Attachments:

1. Vicinity Map and Reorganization Area Map
2. Application, Plan for Service and Fiscal Impact Analysis Including Amended Automatic Aid Agreement between the City and the San Bernardino County Fire Protection District
3. Chapter 13.60 of the City Redlands' Municipal Code
4. Sample Letter and Survey Form
5. Letter from the County Public Works Department
6. Addendum prepared by the Commission's Environmental Consultant, Tom Dodson and Associates, including the City's Environmental Assessment and Mitigated Negative Declaration for Annexation No. 94
7. Draft Resolution No. 3253