

# Shasta Local Agency Formation Commission



DRAFT

Municipal Services Review  
& Sphere of Influence Update

Cottonwood Water District

August 2014

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## **1. EXECUTIVE SUMMARY**

Local agency formation commissions have been tasked with updating local agency municipal service reviews (MSR) and sphere of influence boundaries (SOI) every five years since 2008 [Government Code Section 56425 *et seq.*]. This study presents a baseline review of the District services and SOI needs, satisfying the requirements of this statute, and seeks to associate the original formation purposes and activities of the District with an understanding of its current day operations and future plans.

District staff provided excellent detailed information in response to our Request for Information for this current MSR and SOI review of the District. We will use that data throughout our report, and have attached as Exhibits those sections which we feel will provide the reader with a clear picture of the coordinated operations and services provided by this District.

## **2. GENERAL BACKGROUND**

The Cottonwood Water District service area is located along the Interstate 5 Corridor in southern Shasta County. It provides services to the community of Cottonwood and adjacent areas below and outside the Anderson city boundary. Its southern boundary is about one-quarter mile north of Cottonwood Creek.

Formed in 1955 as a California Water District (Water Code 30321 *et seq.*), water is supplied to residents and business for domestic, sanitation, and fire protection uses.

## **3. AGENCY SERVICES**

In 1955, water service was provided to 160 connections and covered the downtown Cottonwood area. The Cottonwood Water District currently serves about 1,203 connections, of which 1,158 (96%) are to single family residences.

In 2006 the District annexed 1,099 acres, picking up a number of parcels that were outside District boundaries but actually received services from it. This action increased its in-district service area to 2,545 acres. The last approved SOI boundary for the district was in 1995, which established its potential service area at 7,970 acres. The currently proposed SOI boundary is consistent with the earlier study.

In the early years, services were frequently extended to parcels outside the District boundary. After LAFCO was formed in the late 1960s and implemented during the 1970s, the issue of extending services to out-of-area parcels became quite a problem, and eventually was addressed. These days, LAFCO must review and approve all proposed contracts for out-of-area

services prior to the District implementing them (G.C. 56133). The revision of the Cortese-Knox-Nesbit Act in 2000, firmly affixed this requirement to all proposed agency extension of services.

One of the main reasons for this annexation was to establish more balance between in-district parcels who carried the burden of agency bonds and loans, and out-of-district parcels who may have paid more for their water, but were not encumbered by assessments or taxes that support the rest of the in-district services. It is also easier for an agency to manage one system and maintain relative parity when it comes to the delivery of services. The 2006 annexation project appears to have resolved that issue for the District. In order to receive services, parcels need either to become part of the District, or petition LAFCO for permission to do so. In either case, the question will now come before the Commission for approval.

In 2013, the District board of directors approved a request to provide water to a 90-unit residential housing development of 120 acres, commonly referred to as the Stephens Ridge project. That project proponent, in addition to addressing county development requirements, will need to annex into the Cottonwood Water District before services will be provided.

Normally, a district or city will act as the Lead Agency for CEQA and as applicant for projects like Stephens Ridge. This approach places the initial decisions and fixing necessary conditions with the people most involved in providing the future services. LAFCO then reviews the proposal in light of its policies and provisions of state codes to assure everything is in order, acts as Responsible Agency for CEQA, and makes determinations to finalize the boundary change(s).

**a. Infrastructure, Facilities and Services: *Municipal Utilities Water Service***

The District has continued to expand delivery of services since its formation in 1955. Groundwater projection capabilities have also been expanded with the addition of four wells, a booster pump station, and two storage tanks.

The District estimates a maximum day demand (MDD) of 1,700 gallons of water for a typical single family household. In 2013 the District experienced several MDD events at 2.4 million gallons per day. This was determined by measuring flow meters at the District's five working wells. Well #3 is isolated and serves only the Arroyo Manor Subdivision.

The remaining four wells have capacity to provide 1,960 gallons per minute or 2.8 million gallons a day. Although these wells could operate 24 hours per day, the District maintains close attention to operations and maintenance plans, assuring that sufficient water is deliverable to its customers. Like other water agencies enduring the current drought in Shasta County, the District is currently responding to state and federal water conservation restrictions. Table 2 of Exhibit 10.b. (District Administrative

Draft, pgs. 5-7) included with this report describes the present and future facilities inventory used as a basis for connection fees.

#### **b. Administration, Management and Operations**

When preparing or updating a municipal service review, information about administrative, management and operational functions, including assuring internal organization and agency policies, rules, and regulations are evaluated with respect to efficiencies and/or cost avoidance opportunities.

The District Board of Directors operates as governing body of the District. The day-to-day management of the District is the responsibility of General Manager, appointed by the Board, who brings administrative and fiscal recommendations to them for approval.

The District currently has three full-time, benefited employees: a general manager, secretary, and maintenance worker. A policy and procedures manual has been established by the Board for all employees. Annual audits, legal counsel, and fee studies are contracted out to economize in-house expenses.

The district participates in a joint powers agreement with the Association of California Water Agencies/Joint Powers Insurance Authority, contributes to the California Public Employees Retirement System, and is a member of both the California Rural Water Association and the Association of California Water Agencies.

#### **c. Fiscal**

The Board of Directors is responsible for establishing and maintaining a system of internal accounting control and has established a financial committee to provide oversight and assistance.

The District does not share in the Shasta County Special District property tax pool because it did not levy an ad valorem tax in the base year of 1976-1977. The district accounts are organized between an Enterprise Fund and a Bond Fund, which addressed a 1991 improvement assessment. By 2004-2005 all obligations for this bond were paid and the assessment district was retired along with the bond.

Current financial reports follow. The full 2012-13 Audit documents are included as Exhibit 10.d. at the end of this report.

COTTONWOOD WATER DISTRICT

Statement of Net Position  
June 30, 2013

<b>Assets:</b>	
<i>Current Assets:</i>	
Cash	\$ 58,806
Cash - Time Deposits	107,061
Accounts Receivable	55,080
Inventory	19,210
Prepaid Expenses	7,973
Interest receivable	291
Total Current Assets	<u>248,421</u>
<i>Non-Current Assets:</i>	
Restricted cash	411,099
Capital assets, non-depreciable	38,077
Capital assets, depreciable, net of accumulated depreciation	1,076,978
Total Non-current Assets	<u>1,526,154</u>
Total Assets	<u>\$ 1,774,575</u>
<b>Liabilities:</b>	
<i>Current Liabilities</i>	
Accounts payable	\$ 6,770
Liability for compensated absences	4,303
Accrued liabilities	-
Current portion of deposits from customers	6,000
Total Current Liabilities	<u>17,073</u>
<i>Non-Current Liabilities</i>	
Non-current portion of deposits from customers	<u>15,441</u>
Total Liabilities	<u>32,514</u>
<b>Net Position:</b>	
Net investment in capital assets	1,115,055
Restricted for expansion	411,099
Unrestricted	215,907
Total Net Position	<u>1,742,061</u>
Total Liabilities and Net Position	<u>\$ 1,774,575</u>

See accompanying notes to financial statements

**COTTONWOOD WATER DISTRICT**

Statement of Revenues, Expenses and Changes in Net Position  
For the Year Ended June 30, 2013

<b>Operating Revenues:</b>	
Water sales	\$ 436,186
Other charges	9,394
Total Operating Revenues	<u>445,580</u>
<b>Operating Expenses:</b>	
<i>Payroll and benefits</i>	
Administrative payroll	59,209
Transmission and maintenance payroll	59,680
Payroll benefits	34,060
Insurance - health	39,683
Total Payroll and benefits	<u>192,632</u>
<i>Services and supplies</i>	
Utilities	115,428
Transmission and maintenance	21,302
Office and general expenses	24,111
Insurance - general liability	7,218
Tools and supplies	6,960
Legal and audit	4,040
Contracted services	4,943
Auto and truck	1,298
Total Services and supplies	<u>185,300</u>
Depreciation	<u>65,710</u>
Total Operating Expenses	<u>443,642</u>
Operating Income (Loss)	1,938
<b>Non-Operating Revenues and Expenses:</b>	
Capacity expansion fees	27,600
Interest income	1,841
Change in Net Position	<u>31,379</u>
Net Position - Beginning	<u>1,710,682</u>
Net Position - Ending	<u>\$ 1,742,061</u>

See accompanying notes to financial statements

COTTONWOOD WATER DISTRICT

Statement of Cash Flows  
For the Year Ended June 30, 2013

<b>Cash Flows From Operating Activities:</b>	
Cash received from customers	\$ 434,209
Cash payments to suppliers for goods and services	(196,159)
Cash payments to employees for services	(120,364)
Cash payments for payroll taxes and employee benefits	(73,743)
Net Cash Provided (Used) by Operating Activities	<u>43,943</u>
<b>Cash Flows from Capital and Related Financing Activities:</b>	
Cash received for connection charges	<u>27,600</u>
Net Cash Provided (Used) by Capital and Related Financing Activities	<u>27,600</u>
<b>Cash Flows from Investing Activities:</b>	
Interest on Investments	<u>1,550</u>
Net Increase (Decrease) in Cash and Cash Equivalents	73,093
Cash and Cash Equivalents - Beginning of Year	<u>503,873</u>
Cash and Cash Equivalents - End of Year	<u>\$ 576,966</u>



**COTTONWOOD WATER DISTRICT**

Statement of Cash Flows  
For the Year Ended June 30, 2013

<b>Reconciliation of Operating Loss to Net Cash</b>	
<b>Provided by Operating Activities</b>	
Operating Income	\$ 1,938
Adjustment to reconcile operating loss to net cash provided by operating activities:	
Depreciation and amortization	65,710
Change in assets and liabilities	
(Increase) decrease in accounts receivable	(7,189)
(Increase) decrease in Inventory	3
(Increase) decrease in prepaid expense	(5,443)
Increase (decrease) in accounts payable and accrued expenses	(10,862)
Increase (decrease) in current customer deposits	1,261
Increase (decrease) in accrued compensated absences	(1,475)
	<u>43,943</u>
<b>Net Cash Provided by Operating Activities</b>	<b>\$ 43,943</b>
<b>Cash and Cash Equivalents</b>	
Financial Statement Classification:	
Cash	\$ 58,806
Cash - Time Deposits	107,061
Restricted cash	<u>411,099</u>
<b>Total Cash and Cash Equivalents - Reported on Balance Sheet</b>	<b>\$ 576,966</b>

The District manages a very conservative budget, providing due diligence on all fiscal matters and records. The current budget follows:

**COTTONWOOD WATER DISTRICT  
BUDGET REPORT**

	FY-2012-2013 PROPOSED	FY 2012- 2013 ACTUALS	FY 2013-2014 PROPOSED
<b>REVENUE</b>			
Capacity Charge	0.00	27,600.00	34,500.00
Meter Charge Fee	0.00	880.00	500.00
Water Sales	413,500.00	439,735.00	439,000.00
Hydrant Meter Rental Fee	100.00	(29.00)	0.00
No Money Credit	0.00	2,853.00	1,000.00
Backflow test fee	875.00	875.00	955.00
Other Income	1,500.00	3,831.00	3,000.00
<b>TOTAL</b>	<b>415,975.00</b>	<b>475,745.00</b>	<b>478,955.00</b>
<b>INTEREST INCOME</b>			
Operations	1,900.00	1,540.00	1,500.00
Map deposit	10.00	6.00	6.00
Water Trust Acct	20.00	4.00	4.00
Capacity Charge	1,250.00	1,332.00	1,400.00
Total Interest Income	<b>3,180.00</b>	<b>2,882.00</b>	<b>2,910.00</b>
<b>TOTAL INCOME</b>	<b>419,155.00</b>	<b>478,627.00</b>	<b>481,865.00</b>
<b>GENERAL &amp; ADMINISTRATIVE</b>			
Administration	1,250.00	3,524.00	3,000.00
Bad Debt Expense	600.00	708.00	300.00
Computer Consulting	100.00	604.00	200.00
Contract Labor Expense	100.00	0.00	100.00
Dept Health Services	6,000.00	6,312.00	6,500.00
Dues Expense	3,300.00	3,370.00	3,400.00
Equipment	500.00	1,455.00	2,500.00
Insurance General	7,500.00	13,517.00	14,000.00
Insurance Health	34,500.00	42,224.00	39,000.00
Lab Fees	1,750.00	4,339.00	3,000.00
Legal and accounting Fees	3,800.00	4,040.00	4,500.00
Materials	3,000.00	3,772.00	4,000.00
Office Supply	14,000.00	12,197.00	13,000.00
Telephone	3,000.00	2,515.00	2,600.00
Utilities General	2,500.00	2,018.00	2,500.00
<b>TOTAL</b>	<b>81,900.00</b>	<b>100,595.00</b>	<b>98,600.00</b>
<b>PAYROLL</b>			
Workman's Compensation	7,200.00	8,985.00	9,000.00
Employee Benefits	15,000.00	15,076.00	16,000.00
Payroll Tax	11,000.00	10,209.00	11,000.00
Wages General	61,200.00	60,893.00	61,000.00
<b>TOTAL</b>	<b>94,400.00</b>	<b>95,163.00</b>	<b>97,000.00</b>
<b>TRANSMISSION AND DISTRIBUTION</b>			
Utilities Pumping	90,000.00	106,639.00	107,000.00
T&D Utilities	1.00	969.00	1,000.00
T&D Expense	10,000.00	8,746.00	9,000.00
T&D Legal Engineering	0.00	0.00	200.00
T&D Training	200.00	125.00	300.00
T&D Telephone	1,500.00	1,332.00	1,400.00
T&D Truck & Auto	15,000.00	9,988.00	9,000.00
T&D Wages	63,550.00	59,680.00	61,000.00
<b>TOTAL</b>	<b>180,251.00</b>	<b>187,479.00</b>	<b>188,900.00</b>
<b>INCOME TOTAL</b>	<b>419,155.00</b>	<b>478,627.00</b>	<b>481,865.00</b>
<b>EXPENSE TOTAL</b>	<b>356,550.00</b>	<b>383,237.00</b>	<b>384,500.00</b>
	<b>62,605.00</b>	<b>95,390.00</b>	<b>97,365.00</b>
<b>DEPRECIATION</b>	70,225.00	65,055.00	66,000.00
<b>NET INCOME</b>	<b>(8,850.00)</b>	<b>30,335.00</b>	<b>31,365.00</b>

The District implemented a Capacity Charge in October 2005, which replaces the previously used Connection Fee. This new fee is for the recapture of costs expended by the District to provide such facilities as water storage, water production, pumping stations, distribution systems and other related miscellaneous costs, which will provide a benefit to the property served. It also supports funding capital costs of general improvements planned for the future. Specific details of this fee are found in the District's Administrative Draft (pg. 8-9) in Exhibit 10.b. of this report. Infrastructure replacement is prioritized on the basis of age, wear, and necessity, with engine replacements based on a 50-year service life.

#### **d. Governance**

The five-member Board of Directors operates as the governing body for the District. Its duties include approving budgets, setting utility rates, and issuing authorized bonds. They serve staggered four-year terms, with an election held every two years if there are more candidates than vacancies. Board members are required to live within the District boundaries.

The District is a registered-voter district. Only registered voters who reside within the District boundaries are eligible to vote; they do not have to be landowners.

Board meetings are held the second Monday of each month at 5:00 p.m. at the District offices in Cottonwood (3282 Chestnut Street). Matters pertaining to District operations that require action by the Board are placed on an agenda for a regular meeting of the Board. Meetings are subject to the Ralph M. Brown Act and all State laws pertaining to notification of public meetings on District matters. Meeting notices are given to all customers that include the date, time, place and purpose of the meeting.

#### **4. REGIONAL CONTEXT/RELEVANT SERVICES BY OTHER AGENCIES**

Land use and building regulation services are provided by the County of Shasta, as are law enforcement, road services and other general services provided to other unincorporated areas of the county by various county departments. The Cottonwood Community Plan, adopted by the Shasta County Board of Supervisors in 1988, currently governs land use and zoning developments.

#### **5. AGENCY BOUNDARY AND PROPOSED SPHERE OF INFLUENCE UPDATE MAPS.**

The District's service area is identified by its current boundaries and the SOI boundary updated in 1995. The District indicates some interest from the City of Anderson about annexing some parcels within the District's northwest boundary,

however, the City recently requested, and LAFCO approved, setting its SOI boundary without adding any new territory to it. Currently the SOI boundaries for both the City of Anderson and the Cottonwood Water District meet on the northern edge but do not overlap.

Also, some discussion about combining County Service Area #17, which provides wastewater treatment, has occurred in the past, but the District board has yet to express an interest in pursuing this action. The District could pursue this route if the Board deemed the action would be beneficial to its public and would be self-supporting. Such a move would involve an application to LAFCO and is likely to receive wide public review prior to LAFCO approval.

Other local public agencies in Shasta County who provide diverse levels of both water and wastewater services for their customers include: Fall River Valley Community Services District, Clear Creek Community Services District, County Service Area #8-Palo Cedro, County Service Area #13-Alpine Meadows, Burney Water District, and Tucker Oaks Water District. Several other districts have the power to implement both of these services as outlined in the codes that govern their operations.

Recently, at its January 9, 2014, meeting, Shasta LAFCO rescinded a previous “latent services” restriction that had been applied to all community services districts. This means that at this time these local agencies can provide all authorized services outlined in their enabling acts or codes, should they decide to do so and are able to finance those services, without formally coming back to LAFCO for permission. Should the Commission determine to revisit this issue at a later time, the subsequent requisite hearing process would provide wide-spread notice and involvement of local agencies and citizens in this process.

It is proposed the Commission set the SOI boundary to include all parcels shown on the enclosed map of proposed Cottonwood Water District SOI Boundary Update at the end of this report.

## **6. WRITTEN DETERMINATIONS FOR THE MUNICIPAL SERVICE REVIEW**

### **a. Growth & Population Projections**

Development and growth within the District will be primarily guided by an improved economy and the willingness of applicants for service to pay for extension of District services. Extension of services into the SOI boundary area will require, in most cases, an application to annex into the District.

Unemployment as of June 2014 was about 9.5%, with future job growth estimated at 32.60%. The Cottonwood area has experienced a 16.9% increase in population from 2010 to 2014, with a population change factor of 33%. (Sperling's Best Places website).

District operations, service availability, and program growth will be included and considered during future processing of development permit by regulating agencies so as to effectively meet anticipated District service needs.

The District notes that the Master Water Plan which has effectively guided the District over the past 24 years is being revised to reflect future service needs for areas within the SOI boundary which may request to annex. It estimates service delivery to about 1,021 Household Equivalent/water demand connections as of this date.

**b. Disadvantaged Unincorporated Communities (DUCs)**

The median per capita annual income state-wide is calculated at \$46,477, and a local community would qualify for designation as a DUC if their median income falls below 80% of this figure.

The median per capita income calculation for the District service area is estimated to be near \$26,555, which is 57% of the state poverty level. The area serviced by the District has more than 12 registered voters and the per capita annual income is 57% below the state calculator. This percentage qualifies Cottonwood as a Severely Disadvantaged Unincorporated community (below 60% of the state figure). The current population is estimated at 4,330.

California State Parks ([www.parks.ca.gov](http://www.parks.ca.gov)) provides a Community Locator tool which helps with identifying the general income within an agency's service area. It is usually sufficient as a guideline for this level of review (see attached sheets). The population counts shown on these reports are estimates and may not reflect the actual residential population of the area.

**c. Present and Planned of Public Facilities**

The District monitors capital improvement needs to maintain and upgrade service systems. Future development will pay its pro rata share of costs for services. Please refer to the District's Administrative Draft for specifics. The Cottonwood Water District's Master Plan is available for review, electronically or in hard copy, upon request to either the District or Shasta LAFCO.

**d. Adequacy of Public Services**

District facilities are adequate for current service needs. It also has sufficient access to needed resources and capacity to serve the areas within the proposed sphere of influence boundaries, with the cost of extension of services tied to development permits for future growth.

**e. Infrastructure Needs or Deficiencies**

The District monitors and evaluates water service infrastructure for capacity, condition, availability, and quality water and sewer services. Correlation of operational, capital improvement, and finance plans are appropriate for the size of the District and its service area at this time.

**f. Financing Constraints and Opportunities**

As an “enterprise” district, the District derives its water service funding from fees and charges levied for services provided. As such, the District must maintain a reasonable nexus between fees and charges levied and the cost of the service provided. That having been said, the District seeks to be as efficient and innovative as possible in maximizing use of existing fiscal resources.

Imposition of the \$6,900 Capacity Charge per connection permitted the district to fund construction of the Rhonda Road water tank and pipeline, with the cost absorbed by the District reserves. Future funding will be needed to construct Well No. 6 and a 0.25 million gallon water tank to provide required water and minimum storage volume over the next ten years for an additional 350 service connections. Without setting this Charge, it was likely the District might have had to declare a moratorium on new services, requiring future development to pay for the entire cost of these facilities. The District also approved an increase to their water sales rate in February 2012.

The District utilizes cost avoidance techniques that increase efficiency and decrease operating costs. Techniques include eliminating duplicate services, reducing high-administrative-to-operational-cost ratios, reducing inventories of inefficient and/or outdated equipment, implementing economies of scale, and creative use of personnel resources.

More specific data may be found in the District’s Administrative Draft, Exhibit 10.b. following this report.

**g. Opportunities for Rate Restructuring**

The District primarily utilizes water sales and the Capacity Charge for maintenance and construction of improvements. This charge will be updated yearly to keep up with inflation and increased costs.

As noted above under Financing Constraints and Opportunities, there are inherent statutory limitations on the District's ability to restructure rates. With that in mind, the District should regularly review fees and charges levied so as to maintain a reasonable nexus between rates and actual costs.

The District also employs effective rate setting procedures, identifies conditions that could impact future rates, and gives due consideration to timely restructuring opportunities without impairing the quality of services delivered.

**h. Status of and Opportunities for Shared Facilities**

There are presently inherent limitations – geographically, jurisdictionally, and operationally – on District water service facilities being extended to and/or shared with other areas or other water service purveyors outside its proposed SOI boundary. Topographic considerations prevent sharing with the City of Anderson. There are no identifiable agencies with whom the District could collaborate on this issue.

**i. Accountability for Community Service needs, governmental structure, and operational efficiencies.**

The District meets quarterly (or more often if needed), notices meetings, and offers the public an opportunity to participate in their meetings, which are mainly focused on provision of water and maintenance of facilities.

It works effectively with other public water systems or other public organizations in exploring inter-governmental options that may have the potential to achieve economies of scale and greater efficiencies in the delivery of service.

The District continues to strive towards an effective internal organization to provide efficient, quality services, and has developed an understanding of the various governmental restructuring and jurisdictional change options provided under the LAFCO statute as they pertain to the District and its services.

## **7. WRITTEN DETERMINATIONS FOR THE SPHERE OF INFLUENCE UPDATE**

### **a. Present and planned land uses**

Shasta County designates much of the area served as rural residential, agricultural, and timber lands. This is a rural area, with community development either clustered around the town center or scattered about on secondary roads. The Cottonwood Community Plan addresses current planning and zoning uses permitted within the District and the SOI boundary.

### **b. Present and probable need for public facilities; adequacy of services**

The District has ongoing capital improvement programs to maintain and upgrade service systems. It is currently updating its Master Plan to accommodate additional growth needs and service connections.

### **c. Present capacity of public facilities and adequacy of services**

District facilities are very adequate for current service needs. It has the capacity to serve the areas within the proposed sphere of influence boundaries, with extension of services tied to development of parcels.

### **d. Existence of social or economic communities of interest**

The District is located just south of the City of Anderson, is served by the Cottonwood Fire Protection District. The Cities of Redding and Anderson both provide major shopping and service industry hubs for local residents. The City of Red Bluff to the south also provides additional opportunities for residents.

### **e. Present and probable needs of disadvantaged unincorporated communities (DUCs) within the area.**

As identified in the MSR section, the District service area qualifies as a severely disadvantaged community (less than 60% of the state figure). Shasta County is in the process of undertaking a study of these DUCs as part of their General Plan update and additional information should be available for an expanded analysis of this designation during the next MSR/SOI Update which will be due in 2019. This study simply identifies the first step in that process: that the area within the District qualifies as a DUC and will be evaluated as such in future projects.

## **8. CONCLUSION**

In this review, Shasta LAFCO has endeavored to accurately assess the current services and organizational status of District as a provider of water and sewer services based upon information available at this time.

This is the first review of this district's sphere of influence since 1995, and it is expected that additional service data will be brought forward as future development occurs. LAFCO has made what we believe are substantiated determinations based upon prescribed statutory factors.

It is recommended that the municipal service review and sphere of influence update for the District be adopted as proposed on the enclosed SOI update map.

## **9. REFERENCES**

- a. District (interviews, records)
- b. County of Shasta Departments
- c. Shasta LAFCO files for this district.
- d. Internet research on various sites.

## **10. EXHIBITS**

- a. Map of proposed SOI Boundary
- b. District Response: Updated Administrative MSR Draft
- c. District Audit: FY 2012-2013
- d. Community Calculator – District Area
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