

SONOMA LOCAL AGENCY FORMATION COMMISSION

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May 29, 2019

The Honorable Kansen Chu
California State Assembly
State Capital Room 3126
Sacramento, CA 95814

Subject: **Oppose AB 600 (as amended April 29, 2019)**

Dear Assembly Member Chu:

The Sonoma Local Agency Formation Commission (LAFCO) joins the California Association of Local Agency Formation Commissions (CALAFCO) to remain opposed to your bill, **Assembly Bill 600**. LAFCOs are aware of and concerned about the disparity of local public services, especially for residents and properties located within disadvantaged unincorporated communities (DUCs). All Californians deserve adequate and safe drinking water and wastewater facilities. Sonoma LAFCO supports efforts to address these problems, which persist in many counties; however **AB 600**, as amended on April 29, 2019, does not represent a collective stakeholder dialogue with reasonable and systemic solutions to the problem.

The bill allows for an extension of service in lieu of annexation, and Sonoma LAFCO remains concerned about the extension of service to territory outside the jurisdictional boundary of an agency without annexation to that agency. One of the primary statutory purposes of LAFCO is to ensure orderly growth. Extending service on an individual basis or by service category without annexation serves only to undermine the very purpose of jurisdictional boundaries and sphere of influence plans; such action also conflicts with existing statute, Government Code Section 56133(b).

Another of LAFCO's statutory purposes is to promote the effective and efficient provision of municipal services. Ultimately, the annexation of a DUC does not ensure it will receive adequate, safe drinking water. The reality is that engineering and financial issues must be solved to ensure the provision of services. This bill does not address those ongoing issues. We want to ensure that local circumstances and conditions are taken into consideration, but this bill offers a "one size fits all" approach that may not be effective in many instances.

The bill adds (8)(C) to Government Code Section 56375. As written, this section is confusing and contradicts §56375(8)(A). We believe the intention is to prohibit LAFCO from approving the annexation of two or more contiguous disadvantaged communities that are individually fewer than ten acres but cumulatively more than ten acres, within a five-year period. If so, the stated language conflicts with §56375(8)(A), which allows for Commission policies to guide the Commission in determining the size of the area to be annexed. Further, the term "paragraph" as used in this section creates uncertainty as to what section or subsection is actually being addressed.

Sonoma LAFCO supports workable and sustainable policy solutions to the disparities in service delivery to disadvantaged communities. However, a major obstacle remains infrastructure and operational funding for these services. Addressing the needs of disadvantaged communities through the planning process and finding tools to support the infrastructure deficiencies and implementation actions remain a vital part of the solution.

For all of the reasons noted above, Sonoma LAFCO remains opposed to **AB 600**. Please contact me should you have any questions.

Yours sincerely,

Mark Bramfitt
Executive Officer

c: William Weber, Consultant, Assembly Republican Caucus
Pamela Miller, Executive Director, CALAFCO