

Draft Resolution

111 Santa Rosa Ave. Ste. 240
Santa Rosa, CA 95404

November 6, 2019

Resolution of the Local Agency Formation Commission of the County of Sonoma, State of California, Making Findings and Determinations Related to Information Contained in the Municipal Service Review and Sphere of Influence Study for the Kenwood Fire Protection District, Glen Ellen Fire Protection District, Valley of the Moon Fire Protection District, Schell-Vista Fire Protection District, City of Sonoma (fire and emergency medical services only) and County Service Area 40-Fire Services (Mayacamas Volunteer Fire Department and Incident Response Area 31-75), Determining Exemption from the California Environmental Quality Act, Adopting the Determinations of the Municipal Service Review and Sphere of Influence Study, and Amending the Spheres of Influence of the Subject Agencies.

RESOLVED, that the Local Agency Formation Commission of the County of Sonoma (“the Commission”) hereby finds and determines as follows:

1. Procedural History

1.1 Six fire and emergency medical services agencies in the Sonoma Valley portion of Sonoma County (“the Subject Agencies”) requested that the Commission prepare a Municipal Service Review (“MSR”) to determine the feasibility of amending the spheres of influence (“SOI”) of the Subject Agencies pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, Government Code section 56000 et seq. (“the Cortese-Knox-Hertzberg Act”).

1.2 The Executive Officer considered the request and prepared a municipal service review and sphere of influence study (“the MSR/SOI Study”).

1.3 The Executive Officer determined that the Commission would comply with California Environmental Quality Act (“CEQA”) and the State CEQA Guidelines by acting as the lead agency in its consideration of the MSR/SOI Study and proposed amendment of the spheres of influence of the Subject Agencies (together “the MSR/SOI Study and Spheres of Influence Amendments”). The Executive Officer further determined that the MSR/SOI Study and Spheres of Influence Amendments is exempt pursuant to State CEQA Guidelines Sections 15306 and 15061(b)(3).

1.4 Following the preparation of the MSR/SOI Study, the Executive Officer set the matter for consideration by the Commission and provided notice thereof as provided in the Cortese-Knox-Hertzberg Act.

1.5 The Executive Officer considered written comments received on the MSR/SOI Study and prepared a staff report (“the Executive Officer’s Report”) which included a recommendation for the MSR/SOI Study and Spheres of Influence Amendments. The Executive Officer furnished copies of the Executive Officer’s Report to all persons entitled to copies under the Cortese-Knox-Hertzberg Act.

1.6 The Commission conducted a noticed public hearing to consider the MSR/SOI Study and Spheres of Influence Amendments on November 6, 2019. At the hearing, the Commission heard and received all relevant oral and written testimony and evidence presented or filed and considered the Executive Officer’s Report and the MSR/SOI Study and Spheres of Influence Amendments. All interested persons were given the opportunity to hear and be heard. At the conclusion of public testimony, the Commission closed the public hearing and adopted the determinations in the MSR/SOI Study and voted to amend the spheres of influence (“the Spheres of Influence) of the Subject Agencies.

1.7 The Commission has reviewed and considered this resolution and hereby finds that it accurately sets forth the intentions of the Commission regarding the determinations of the MSR/SOI Study and Spheres of Influence Amendments.

2. CEQA Compliance

2.1 The Commission concurs with the Executive Officer and finds that the Commission is the lead agency for the preparation of the MSR/SOI Study and Spheres of Influence Amendments, pursuant to CEQA and the state CEQA Guidelines.

2.2 The Commission finds and determines that preparation of a Municipal Service Review consists largely of the collection of data and research through reports and/or interviews with those knowledgeable about the agencies studied, resulting in conclusions and recommendations. When such activities “do not result in a serious or major disturbance to an environmental resource,” pursuant to Section 15306 of the State CEQA Guidelines, is exempt from CEQA.

2.3 The Commission finds and determines that amendment to the Spheres of Influence of the Subject Agencies is exempt from CEQA pursuant to Section 15061 (b)(3) of the State CEQA Guidelines, which states that CEQA applies only to projects that have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is not a possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.

2.3 Amendment to the Spheres of Influence of the Subject Agencies will not result in a physical change to the environment in and of itself. Any future actions for change of organization would be further subject to separate environmental determination.

2.3 The Commission has considered the potential environmental effects of the MSR/SOI Study and Spheres of Influence Amendments prior to reaching its decision. The Commission finds that, in doing so, it has fully discharged its responsibilities under CEQA.

3. Cortese-Knox-Hertzberg Act Compliance – Municipal Service Review

3.1 The Cortese-Knox-Hertzberg Act directs LAFCOs to review and update agencies' spheres of influence, as necessary, every five years and further to conduct municipal service reviews prior to, or in conjunction with such updates. With regard to the Agencies' Request, the Commission makes the following summary determinations:

3.2 Growth and population projections for the affected area:

- a. Although there continues to be modest population growth in the Sonoma Valley, subject agencies point to an array of other factors driving increased call volumes.
- b. These factors include an aging population and a dramatic increase in tourist visitors to the region.
- c. Similarly, agencies do not consider land use development a driver of call volume.

3.3 The location and characteristics of any disadvantaged unincorporated communities within or contiguous to the sphere of influence:

- a. There are three LAFCO-designated disadvantaged unincorporated communities within two of the territories served by the subject agencies.

3.4 The present and planned capacity of public facilities adequacy of public services, and infrastructure needs or deficiencies including needs or deficiencies related to sewers, municipal and industrial water, and structural fire protection in any disadvantaged, unincorporated communities within or contiguous to the sphere of influence:

- b. All subject agencies are experiencing staffing challenges of one form or another. These challenges range across a spectrum that includes:
 - A decline in active volunteer ranks
 - Declines in volunteer availability during particular shifts/times
 - A lack of promotional career paths for career professionals
 - Difficulty in retaining career professionals due to salary and benefit competition in Sonoma County and the Bay Area region
- c. Improvements to stipend programs for volunteers may enable agencies to address staffing challenges without transitioning fully to career-professional staffing, which most agencies cannot support financially.

- d. The Sonoma Valley volunteer agencies cannot provide “2/0” staffing at all times – the ability to respond to incident calls with two qualified personnel. The agencies with career professional staff are often unable to provide “3/0” staffing for responses, which is considered the optimum staffing level for providing appropriate service in suburban and urban areas. Additional revenue will be required to provide more career professional staff to address staffing levels.
- e. The Valley of the Moon FPD has secured a grant that will provide additional staffing for a three year period, improving coverage for the City of Sonoma and Glen Ellen FPDs, which are served under contract by Valley of the Moon. The grant provides funding for only three years, highlighting the need for the District (or a regionally reorganized agency) to develop an additional sustainable funding stream.
- f. Establishing more career-professional positions (particularly during weekday daytime shifts) within a regional agency would provide more opportunities for career progression.
- g. A regional agency would, over time, provide standardized training that would improve service delivery.
- h. While a cursory review of response time statistics indicate that most agencies are meeting National Fire Protection Association guidelines, the statistics are rudimentary and could obscure significant service level deficiencies.
- i. The provision of emergency medical services and ambulance coverage throughout the Sonoma Valley is vital. The Valley of the Moon Fire Protection District, operating as the Sonoma Valley Fire and Rescue Authority, provides advanced life support/ambulance coverage for all areas in the region, although the agency does not have sole service rights within the Kenwood Fire Protection District area.
- j. Although the facilities and equipment of the subject agencies are generally in reasonable condition, there are facilities that may require upgrades.

3.5 Financial ability of agencies to provide services:

- a. Three subject agencies do not prepare multi-year budget projections, which would nominally indicate impending financial sustainability challenges.
- b. The fire protection Districts and the City of Sonoma have taken steps to ensure financial stability, although the Valley of the Moon FPD needs additional revenue to maintain service levels as part of the Sonoma Valley Fire and Rescue Authority.
- c. Under a short-term contractual agreement with the County, the Mayacamas VFD will have appropriate financial and administrative support through 2020. Sonoma Valley Fire and Rescue is negotiating a longer-term contract for support services to Mayacamas, but

recognizes that a reorganization into a regional agency is a preferable long-term solution.

- d. The facilities operated by the Sonoma Valley agencies are generally appropriate for their use, with the Kenwood station most in need of retrofits/expansion.

3.6 Accountability for community service needs, including governmental structure and operational efficiencies:

- a. The fire protection districts in Sonoma Valley appear to have well-functioning governing boards. The governance and accountability of the Mayacamas VFD 501 (c)(3) and district volunteer associations was not evaluated.
- b. No district reported any particular difficulty in recruiting candidates to run for board seats, though most have not seen contested seats either. Board members often have a fire and emergency services career background; it might better serve agency and community interests to have a wider variety of board member backgrounds and experience, and for there to be a somewhat higher turnover rate.
- c. There are no apparent instances of recent violations of open meeting regulations, campaign regulations, or other accountability requirements among the fire protection districts in Sonoma Valley.

3.7 Status of, and opportunities for, shared facilities:

- a. Any proposed reorganizations of subject agencies, or contractual service arrangements, are unlikely to generate significant cost savings.
- b. A regionally consolidated agency or agencies would be better positioned to evaluate and project capital and expense needs, enabling agency leadership to develop sustainable funding strategies.

4. With regard to the City of Sonoma and its provision of fire and emergency medical services:

4.1 Growth and population:

- a. The City of Sonoma will continue to experience modest development and population growth, but this growth is not expected to be the primary driver for increases in calls for fire and emergency medical services.

4.2 Disadvantaged unincorporated communities:

- a. There are no LAFCO-designated disadvantaged unincorporated communities within the City of Sonoma. The unincorporated El Verano neighborhood is a designated disadvantaged community, and is adjacent to the City to the west.

4.3 Capacity and adequacy of public facilities and services:

- a. The City, through its contract for services with the Valley of the Moon Fire Protection District, is providing a high standard of services to its residents and to visitors.
- b. The provision of service is exemplified by short response times, appropriately-staffed responses, and a superior ISO fire rating.

4.4 Financial ability:

- a. The City of Sonoma has been able to fund its contract with Valley of the Moon FPD for the past eighteen years, and despite fiscal challenges, is expected to be able to continue to secure fire and emergency medical services under contract for the foreseeable future.
- b. The City and Valley of the Moon might consider renegotiating the current services contract to provide more consistent financial transfers in the near term (next two to three years). This would include removing ambulance service revenue from the transfer equation, and steady, consistent annual contributions for equipment, vehicle maintenance and replacement, and facility maintenance.
- c. The City should also consider exploring the cancellation of the contracted service model with Valley of the Moon, replaced by coverage by a regionally-reorganized Sonoma Valley fire and emergency medical service agency.

4.5 Shared services and facilities:

- a. The City is unlikely to realize any significant cost savings by joining a regional reorganization effort, but would benefit from additional revenues from other agencies that would help sustainably-fund an appropriate level of service throughout the Valley.

4.6 Accountability, structure and efficiencies:

- a. For the purposes of this report, a comprehensive review of the governance and fiscal management of the City has not been undertaken. (It should be noted that there are no indications of any deficiencies in this area.)
- b. The City is encouraged to consider the possibility of formally “ceding” the provision of fire and emergency medical services to a regionally consolidated agency in place of the current contractual arrangement with Valley of the Moon FPD.

5 For the Glen Ellen Fire Protection District:

5.1 Growth and population:

- a. The region served by GEFPD will continue to experience minimal development and population growth due to land use policies enacted

by the County of Sonoma and managed by the County's Permit and Resource Management Department (Permit Sonoma).

- 5.2 Disadvantaged unincorporated communities:
 - a. Glen Ellen is designated as a disadvantaged unincorporated area, and is served by the District.
- 5.3 Capacity and Adequacy of public facilities and services:
 - a. The Glen Ellen Fire Protection District effectively provides fire and emergency services within its existing service area and is expected to be able to serve potential population and development growth for the foreseeable future.
 - b. The District is currently meeting recommended standards to operate a combination fire department under NFPA 1720. (A combination department is one that relies on both paid and volunteer staffing.)
 - c. The District is addressing a decline in the number and availability of volunteers by contracting with the Valley of the Moon Fire District for paid career staff. With current District financing, this service model has been determined to be sustainable at least through 2021, through a review of the contract by LAFCO.
- 5.4 Financial ability:
 - a. The Glen Ellen Fire Protection District has been meeting its expenses without difficulty and has been able to provide funding for infrastructure needs (primarily vehicle and equipment replacement).
 - b. The District has secured sustained revenue to support their current staffing program (provided through a contractual arrangement with Valley of the Moon FPD).
 - c. Financial management of the District is sound, and is independently audited on an annual basis.
- 5.5 Shared services and facilities:
 - a. The Glen Ellen Fire Protection District contracts for services with the Valley of the Moon Fire Protection District, and has indicated a willingness to participate in a regional agency consolidation effort.
- 5.6 Accountability, structure and efficiencies:
 - a. The Glen Ellen Fire Protection District is governed in a manner that not only complies with all statutes and laws, but is fully open to community input. Board directors have been elected and/or appointed appropriately.
 - b. The District undertakes annual independent financial and business practice audits and is in compliance with financial regulations and recommended practices.
 - c. The District is encouraged to continue discussions with all other fire and emergency services providers in Region 3 regarding opportunities

for coordinating service provision to produce efficiencies and cost savings, up to and including potential consolidation of operations in the future.

6 For the Kenwood Fire Protection District:

6.1 Growth and population:

- a. The region served by Kenwood FPD will continue to experience minimal development and population growth due to land use policies enacted by the County of Sonoma and managed by the County's Permit and Resource Management Department (Permit Sonoma).

6.2 Disadvantaged unincorporated communities:

- a. There are no county-designated disadvantaged unincorporated areas within the territory served by the District.

6.3 Capacity and adequacy of public facilities and services:

- a. The Kenwood Fire Protection District effectively provides fire and emergency services within its existing service area and is expected to be able to serve potential population and development growth for the foreseeable future.
- b. The District is currently meeting recommended standards to operate a combination fire department under NFPA 1720 standards. (A combination department is one that relies on both paid and volunteer staffing.)
- c. District leadership believe that additional paid career staffing will be required in the future to maintain service levels given the decreasing availability of volunteers. Additionally, the District believes that pay rates will need to be increased to maintain paid career staff ranks.

6.4 Financial ability:

- a. The Kenwood Fire Protection District has been meeting its expenses without difficulty and has been able to provide funding for infrastructure needs (primarily vehicle and equipment replacement).
- b. Financial management of the District is sound, and is independently audited on an annual basis.

6.5 Shared services and facilities:

- a. The Kenwood Fire Protection District is appropriately positioned to seek out and enter into agreements with other fire and emergency services providers in Region 3 to take advantage of opportunities to reduce costs, and to provide more efficient and effective services.

6.6 Accountability, structure and efficiencies:

- a. The Kenwood Fire Protection District is governed in a manner that not only complies with all statutes and laws, but is fully open to community

input. Board directors have been elected and/or appointed appropriately.

- b. The District undertakes annual independent financial and business practice audits and is in compliance with financial regulations and recommended practices.
- c. The District is encouraged to continue discussions with all other fire and emergency services providers in Region 3 regarding opportunities for coordinating service provision to produce efficiencies and cost savings, up to and including potential consolidation of operations in the future.

7 With regard to the County Service Area 40 territory served by the Mayacamas Volunteer Fire Department:

7.1 Summary determinations:

- a. The Mayacamas Volunteer Fire Department continues to provide a solid volunteer-based fire service.
- b. The County is preparing to enter into a services contract with Valley of the Moon Fire for services for Mayacamas VFD. However, it is critical that Mayacamas-area residents consider long-term, sustainable service options, which would best be achieved through inclusion of the area in a regional agency.

7.2 Growth and population:

- a. The Mayacamas area has not experienced growth and is not expected to do so in the future.

7.3 Capacity and adequacy of public facilities and services:

- a. The Mayacamas area generates about 30 service calls per year.
- b. The Department receives mutual aid support from the Valley of the Moon, Glen Ellen, and Kenwood FPDs, and emergency medical/ambulance support from Valley of the Moon Fire Protection District.

7.4 Financial condition:

- a. As part of County Service Area 40 – Fire Services, Mayacamas VFD was eligible for financial and administrative support from the County of Sonoma. However, the County is preparing to cede a direct administrative support role to North Bay Fire, a new non-profit organization representing the remaining Volunteer Fire Companies in Sonoma County. North Bay Fire has in turn entered into a contract with Gold Ridge Fire Protection District to provide leadership and administrative services. The contract will include provision of stipends for volunteers. The County is funding North Bay Fire for a two-year period, with an expectation that the Volunteer Fire Companies will participate in regional consolidations within that time frame.

- b. North Bay Fire is preparing to contract with Valley of the Moon FPD to provide support services to Mayacamas VFD.

7.5 Shared services and facilities:

- a. Due to low call volumes, the Mayacamas area is likely best-served with a volunteer Department that is part of a regional agency that provides leadership, administrative support, and mutual aid. The volunteer operation would provide “quick response”, with “3/0” staffed response coming from the regional agency out of another location.

7.6 Accountability, structure and efficiencies:

- a. The County of Sonoma, which runs County Service Area 40 as a dependent district, meets all requirements for proper governance.
- b. Volunteer Fire Companies are not government agencies, and are therefore not subject to review of governance strictures.
- c. The County has established a two-year timeframe for Mayacamas VFD (and the other VFCs in the County) to seek reorganization opportunities with other fire and emergency service agencies.

8 With regard to the Schell-Vista Fire Protection District:

8.1 Growth and population:

- a. The region served by SVFPD will continue to experience minimal development and population growth due to land use policies enacted by the County of Sonoma and managed by the County’s Permit and Resource Management Department (Permit Sonoma).

8.2 Disadvantaged unincorporated communities:

- a. There are no county-designated disadvantaged unincorporated areas within the territory served by the District.

8.3 Capacity and adequacy of public facilities and services:

- a. The Schell-Vista Fire Protection District effectively provides fire and emergency services within its existing service area and is expected to be able to serve potential population and development growth for the foreseeable future.
- b. The District is currently meeting recommended standards to operate a combination fire department under NFPA 1720 standards. (A combination department is one that relies on both paid and volunteer staffing.)
- c. The District may face the same challenge that most fire protection districts in Sonoma County face with regards to transitioning from a primarily volunteer-based staffing model to a paid staffing model, due to declines in the availability of volunteers, though it should be noted that the District currently has a robust roster of volunteers.

8.4 Financial ability:

- a. The Schell-Vista Fire Protection District has been meeting its expenses without difficulty and has been able to provide funding for infrastructure needs (primarily vehicle and equipment replacement).
- b. The District has secured sustained revenue to support their current staffing program that includes three paid chief positions that were formerly paid on a shift-stipend basis.
- c. Financial management of the District is sound, and is independently audited on an annual basis.

8.5 Shared facilities and services:

- a. The Schell-Vista Fire Protection District is appropriately positioned to seek out and enter into agreements with other fire and emergency services providers in Region 3 to take advantage of opportunities to reduce costs, and to provide more efficient and effective services.

8.6 Accountability, structure and efficiencies:

- a. The Schell-Vista Fire Protection District is governed in a manner that not only complies with all statutes and laws, but is fully open to community input. Board directors have been elected and/or appointed appropriately.
- b. The District undertakes annual independent financial and business practice audits and is in compliance with financial regulations and recommended practices.
- c. The District is encouraged to continue discussions with all other fire and emergency services providers in Region 3 regarding opportunities for coordinating service provision to produce efficiencies and cost savings, up to and including potential consolidation of operations in the future.

9 With regard to the Valley of the Moon Fire Protection District:

9.1 Growth and population:

- a. The region served by VOMFPD will continue to experience development and population growth due to land use policies enacted by the County of Sonoma and managed by the County's Permit and Resource Management Department (Permit Sonoma).

9.2 Disadvantaged unincorporated communities:

- a. There are two county-designated disadvantaged unincorporated areas within the territory served by the District.

9.3 Capacity and adequacy of public facilities and services:

- a. The Valley of the Moon Fire Protection District effectively provides fire and emergency services within its existing service area and is expected to be able to serve potential population and development growth for the foreseeable future.
- b. The District is currently meeting recommended standards to operate a combination fire department under NFPA 1720 standards. (A combination department is one that relies on both paid and volunteer staffing.)
- c. The District has secured a three-year grant that will enable it to add career paid positions, ensuring “3/0” staffing for engine companies for that period. However, the District will need to secure sustainable funding to maintain that service level.

9.4 Financial ability:

- a. The Valley of the Moon Fire Protection District has been meeting its expenses without difficulty and has been able to provide funding for infrastructure needs (primarily vehicle and equipment replacement).
- b. Financial management of the District is sound, and is independently audited on an annual basis.

9.5 Shared services and facilities:

- a. The Valley of the Moon Fire Protection District is appropriately positioned to seek out and enter into agreements with other fire and emergency services providers in Region 3 to take advantage of opportunities to reduce costs, and to provide more efficient and effective services.

9.6 Accountability, structure and efficiencies:

- a. The Valley of the Moon Fire Protection District is governed in a manner that not only complies with all statutes and laws, but is fully open to community input. Board directors have been elected and/or appointed appropriately.
- b. The District undertakes annual independent financial and business practice audits and is in compliance with financial regulations and recommended practices.
- c. The District is encouraged to continue discussions with all other fire and emergency services providers in Region 3 regarding opportunities for coordinating service provision to produce efficiencies and cost savings, up to and including potential consolidation of operations in the future.

10. Cortese-Knox-Hertzberg Act Compliance – Sphere of Influence

The Commission is ordering an amendment to Glen Ellen Fire Protection District's sphere of influence to include the territory served by the Kenwood Fire Protection District, Valley of the Moon Fire Protection District, Schell-Vista Fire Protection District, the portion of County Service Area 40 served by the Mayacamas Volunteer Fire Department and Incident Response Area 31-75, and for the City of Sonoma (for fire and emergency medical service provision only).

The Commission also orders that the spheres of influence for the Kenwood Fire Protection District, Valley of the Moon Fire Protection District, Schell-Vista Fire Protection District be set as "zero", indicating that it is expected that the territories served by these agencies will be annexed to Glen Ellen Fire Protection District.

10.1 With regard to requirements of the Cortese-Knox-Hertzberg Act for amendments of the Spheres of Influence of the Subject Agencies, the Commission makes the following determinations:

10.2 The present and planned land uses in the area, including agricultural and open space lands:

a. There are no proposed changes to land uses within the Subject Agencies' territories or within the proposed Spheres of Influence of the Subject Agencies.

10.3 The present and probable need for public facilities and services in the area:

a. The recommended sphere of influence amendments, if followed by a regional consolidation through annexations, would provide modest operational and cost efficiencies, although these efficiencies would not ensure the continued viability of the new agency.

b. A regional consolidation would, if appropriately financed through a variety of methods, ensure continued service levels for four of the subject agencies and potentially superior services for Kenwood FPD and Mayacamas VFD.

10.4 The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide:

a. The Kenwood, Valley of the Moon, and Glen Ellen FPDs and the Mayacamas VFD are supportive of seeking an immediate consolidation pending approval of the recommended sphere of influence amendments by the Commission.

- b. While there is no apparent predisposition for Schell-Vista FPD to join or not join a regional agency encompassing these four agencies, there are operational benefits and potentially modest cost savings that could be achieved. Furthermore, Schell-Vista FPD is less suited for inclusion in any other potential regional agency that could be proposed in the County.
- c. The City of Sonoma indicates it would be open to discussions of inclusion in a regional agency after 2020, when it has attended to other funding matters. It is also expected that navigating a consolidation process will be more difficult for the City than for the other five agencies.

10.5 The existence of any social or economic communities of interest in the area if the Commission determines that they are relevant to the agency:

- a. There are no social or economic communities of interest in the areas served by the Subject Agencies.

NOW, THEREFORE, based on the foregoing findings and determinations and the record of these proceedings, and pursuant to the Cortese-Knox-Hertzberg Act, the Commission hereby declares and orders as follows:

1. The foregoing findings and determinations are true and correct, are supported by substantial evidence in the record, and are adopted as hereinabove set forth.
2. The Commission has reviewed and considered the information contained in the final MSR/SOI Study for Sonoma Valley Fire and Emergency Service Agencies.
3. The Commission adopts the determinations made in the MSR/SOI Study for the Subject Agencies and approves the amendments to the Spheres of Influence recommended in the MSR/SOI Study.
4. The Executive Officer is directed to file a Notice of Exemption, in accordance with CEQA and the State CEQA Guidelines.
5. The Clerk of the Commission is designated as the custodian of the documents and other materials that constitute the record of the proceedings upon which the Commission's decision herein is based. These documents may be found at the office of the Clerk of the Commission, 111 Santa Rosa Ave., Ste. 240, Santa Rosa, CA, 95404.

THE FOREGOING RESOLUTION was introduced at a regular meeting of the Commission on the 6th day of November 2019 and ordered adopted by the following vote:

Commissioners:

AYES:

NOES:

ABSENT:

WHEREUPON, the Chair declared the foregoing resolution adopted and

SO ORDERED.

Mark Bramfitt, Executive Officer

The within instrument is a true and correct copy of the original on file in this office.

ATTEST:

BY:

Clerk