

## **Municipal Service Review Community Services Districts**

**Adopted January 10, 2018**

This Municipal Service Review was conducted for two (2) of the three (3) community services districts located in the County of Los Angeles:

- Bradbury Estates Community Services District;
- Pasadena Glen Community Services District; and
- Point Dume Community Services District (MSR will be completed at a later date.)

### **Chapter One: LAFCO Background**

#### *Municipal Boundaries*

The State of California possesses the exclusive power to regulate boundary changes. Cities and special districts do not have the right to change their own boundaries without State approval.

The California Constitution (Article XI, Section 2.a) requires the Legislature to “prescribe [a] uniform procedure for city formation and provide for city powers.” The Legislature also has the authority to create, dissolve, or change the governing jurisdiction of special districts because they receive their powers only through State statutes.

The Legislature has created a “uniform process” for boundary changes for cities and special districts in the Cortese Knox-Hertzberg Local Government Reorganization Act of 2000 (California Government Code Section 56000 *et seq*, or “Act”). The Act delegates the Legislature’s boundary powers over cities and special districts to Local Agency Formation Commissions (LAFCOs) established in each county in the State. The Act is the primary law that governs LAFCOs and sets forth the powers and duties of LAFCOs.

In addition to the Act, LAFCOs must comply with the following State laws:

- California Revenue and Taxation Code Sections 93 and 99. LAFCO considers the revenue and taxation implications of proposals and initiates the property tax negotiation process amongst agencies affected by the proposal.
- California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 *et seq*) and the related CEQA Guidelines (Title 14, California Code of Regulations Section 15000 *et seq*). Applications before LAFCO are considered to be “projects” under CEQA, which requires that potential environmental impacts be analyzed prior to Commission action.

- Ralph M. Brown Act (California Government Code Section 54950 *et seq*). Commonly known as the State’s “open meeting law,” the Brown Act insures that the public has adequate opportunity to participate in the LAFCO process.
- Political Reform Act (California Government Code Section 81000 *et seq*). Commissioners, some LAFCO staff, and legal counsel are subject to the Political Reform Act, which requires the filing of annual reports of economic interests.

### What are LAFCO’s?

LAFCOs are public agencies with county-wide jurisdiction for the county in which they are located. LAFCOs oversee changes to local government boundaries involving the formation and expansion of cities and special districts.

In creating LAFCOs, the Legislature established four priorities: encourage orderly growth and development, promote the logical formation and determination of local agency boundaries, discourage urban sprawl, and preserve open-space and prime agricultural lands.

Created by the State but with local (not State) appointees, each of the 58 counties in the State of California has a LAFCO. Each LAFCO operates independently of other LAFCOs, and each LAFCO has authority only within its corresponding county.

While a LAFCO may purchase services from a county (i.e. legal counsel, employee benefits, payroll processing), LAFCO’s are not County agencies.

### Local Agency Formation Commission for the County of Los Angeles (“LA LAFCO”)

LA LAFCO regulates the boundaries of all 88 incorporated cities within the County of Los Angeles. LAFCO regulates most special district boundaries, including, but not limited to:

- California water districts
- Cemetery districts
- Community service districts (“CSDs”)
- County service areas (“CSAs”)
- County waterworks districts
- Fire protection districts
- Hospital and health care districts
- Irrigation districts
- Library districts
- Municipal utility districts
- Municipal water districts
- Reclamation districts
- Recreation and parks districts
- Resource conservation districts
- Sanitation districts
- Water replenishment districts

LAFCO does not regulate boundaries for the following public agencies:

- Air pollution control districts
- Bridge, highway, and thoroughfare districts
- Community college districts
- Community facility districts (aka “Mello-Roos” districts)
- Improvement districts
- Mutual water companies
- Private water companies
- Redevelopment agencies
- School districts
- Special assessment districts
- Transit and transportation districts

LAFCO does not regulate the boundaries of counties. County boundary adjustments are within the purview of the boards of supervisors for the involved counties.

State law specifically prohibits LAFCOs from imposing terms and conditions which “directly regulate land use, property development, or subdivision requirements.” In considering applications, however, State law requires that LAFCO take into account existing and proposed land uses, as well as General Plan and zoning designations, when rendering its decisions.

The Local Agency Formation Commission for the County of Los Angeles (LA LAFCO, the Commission, or LAFCO) is composed of nine (9) voting members:

- Two (2) members of the Los Angeles County Board of Supervisors (appointed by the Los Angeles County Board of Supervisors);
- One (1) member of the Los Angeles City Council (appointed by the Los Angeles City Council President);
- Two (2) members of city councils who represent the other 87 cities in the county other than the City of Los Angeles (elected by the City Selection Committee);
- Two (2) members who represent independent special districts (elected by the Independent Special Districts Selection Committee);
- One (1) member who represents the San Fernando Valley (appointed by the Los Angeles County Board of Supervisors); and
- One (1) member who represents the general public (elected by the other eight members).

LAFCO also has six (6) alternate members, one (1) for each of the six (6) categories above.

The Commission holds its “regular meetings” at 9:00 a.m. on the second Wednesday of each month. The Commission periodically schedules “special meetings” on a date other than the

second Wednesday of the month. Commission meetings are held in Room 381B of the Kenneth Hahn Hall of Administration, located at 500 West Temple Street in downtown Los Angeles. Public notice, including the Commission agenda, is posted at the Commission meeting room and on LAFCO's web-site ([www.lalafco.org](http://www.lalafco.org)).

The Commission appoints an Executive Officer. A small staff of less than ten (10), reports to the Executive Officer and Deputy Executive Officer.

LAFCO's office is located at 80 South Lake (Suite 870) in the City of Pasadena. The office is open Monday through Thursday from 7:00 a.m. to 5:00 p.m. The office is closed on Fridays.

#### What are LAFCO's responsibilities?

LAFCO oversees changes to local government boundaries involving the formation and expansion of cities and special districts. This includes annexations and detachments of territory to and/or from cities and special districts; incorporations of new cities; formations of new special districts; consolidations of cities or special districts; mergers of special districts with cities; and dissolutions of existing special districts. LAFCO also approves or disapproves proposals from cities and special districts to provide municipal services outside their jurisdictional boundaries (these public agencies can provide services outside of their boundaries under very limited circumstances).

An important tool used in implementing the Act is the adoption of a Sphere of Influence (SOI) for a jurisdiction. An SOI is defined by Government Code Section 56425 as "...a plan for the probable physical boundary and service area of a local agency." An SOI represents an area adjacent to a city or special district where a jurisdiction might be reasonably expected to provide services over the next twenty (20) years. The SOI is generally the territory within which a city or special district is expected to annex.

LAFCO determines an initial SOI for each city and special district in the County. The Commission is also empowered to amend and update SOIs.

All jurisdictional changes, such as incorporations, annexations, and detachments, must be consistent with the affected agency's Sphere of Influence, with limited exceptions.

#### Municipal Service Reviews

State law also mandates that LAFCO prepares Municipal Service Reviews (MSRs). An MSR is a comprehensive analysis of the municipal services, including an evaluation of existing and future service conditions, provided in a particular region, city, or special district. Related to the preparation of MSRs, and pursuant to State Law, LAFCOs must review and update SOIs "every five years, as necessary." The Commission adopted MSRs for all cities and special districts in the County prior to the January 1, 2008 deadline (Round One).

Some LAFCOs prepare MSRs for each city and special district in their region every five years. Other LAFCOs do not prepare MSRs proactively; rather, when a city, special district, or petitioner wants to expand the boundaries of an SOI, the LAFCO requires that the applicant pay for the preparation of an MSR in advance of the SOI determination. Most LAFCOs take an

intermediate approach, above, preparing MSRs for a select group of cities and special districts every five years. This is the approach taken by the Commission (LA LAFCO) at its meeting of March 9, 2011.

In the current round (Round Two), LAFCO is preparing MSRs for a total of nine (9) cities and fourteen (14) special districts. To date, the Commission has adopted MSRs for five (5) cities (Commerce, Compton, Cudahy, Gardena, and Santa Clarita), five (5) cemetery districts (Antelope Valley Cemetery District, Artesia Cemetery District, Downey Cemetery District, Little Lake Cemetery District, and Wilmington Cemetery District), three (3) recreation and park districts (Miraleste Recreation and Park District, Ridgecrest Ranchos Recreation and Park District, and Westfield Recreation and Park District), and three (3) water districts (Huntington Municipal Water District, Palmdale Water District, and Sativa County Water District). Staff is working on MSRs for four (4) cities (Bell, Maywood, South El Monte, and Vernon) and three (3) community services districts (Bradbury Estates Community Services District, Pasadena Glen Community Services District, and Point Dume Community Services District), which are expected to be completed by the end of 2018.

In preparing MSRs, LAFCOs are required to make seven determinations:

- Growth and population projections for the affected area;
- The location and characteristics of any disadvantaged unincorporated communities (DUCs) within or contiguous to a city or district's SOI;
- Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs of deficiencies;
- Financial ability of agencies to provide services;
- Status of, and opportunities for, shared facilities;
- Accountability for community service needs, including governmental structure and operational efficiencies; and
- Any other matter related to effective or efficient service delivery.

Although State law requires the preparation of MSRs, the State does not provide funding to LAFCOs to perform this work. Some MSRs are prepared utilizing existing LAFCO staff; in other instances, LAFCO retains a consultant. This MSR was prepared in-house by LAFCO staff.

(Report continues on Page 6)

## **Chapter Two: Community Services District Enabling Act** (Government Code Sections 61000 – 61226.5)

### **Community Services District Law**

Responding to various communities' desires of public facilities and services that promote the public peace, health, safety, and welfare, the Legislature enacted the Community Services District (CSD) Law in 1951, and reenacted the Community Services District Law in 1955 (pursuant to Government Code Section 61001(a)(2)(3)).

### **Community Services District Law: 2006 Revisions**

In 2006, Senator Christine Kehoe, in partnership with representatives of individual CSDs and the California Special Districts Association, sponsored legislation (SB 135) to overhaul the Community Services District Law. SB 135 was approved by the Legislature and signed by the Governor, and it took effect on January 1, 2006. The reforms involved several substantive and significant changes to the original Community Services District Law.<sup>1</sup>

In enacting the new CSD Law in 2006, State Legislature (pursuant to Government Code Sections 61001(c)) expressed its intent, as follows:

- (1) To continue a broad statutory authority for a class of limited-purpose special districts to provide a wide variety of public facilities and services.
- (2) To encourage LAFCOs to use their municipal service reviews, spheres of influence, and boundary powers, where feasible and appropriate, to combine special districts that serve overlapping or adjacent territory into multifunction community services districts.
- (3) That residents, property owners, and public officials use the powers and procedures provided by the Community Services District Law to meet the diversity of the local conditions, circumstances, and resources.

Under the CSD Law (SB 135), community services districts may be any of the following (pursuant to Government Code Sections 61001(b)):

- (1) A permanent form of governance that can provide locally adequate levels of public services.
- (2) An effective form of governance for combining two or more special districts that serve overlapping or adjacent territory into a multifunction special district.
- (3) A form of governance that can serve as an alternative to the incorporation of a new city.
- (4) A transitional form of governance as the community approaches cityhood.

## Governing Body

The governing body, which is established by law to administer the operation of a community services district, is composed of five (5) board of directors (pursuant to Government Code Section 61040).

Community services districts can be either independent or dependent: independent board of directors are elected by the district's voters or appointed to a fixed term of office by either the city council or board of supervisors. Dependent districts are governed by other existing legislative bodies such as a city council or board of supervisors. Larger independent districts have a professional manager, similar to a city manager or county administrator to assist the governing officials. The governing boards adopt policies that the general managers implement.<sup>2</sup>

SB 135 strengthened the community services districts' governance, as follows:

- Voters can elect directors at-large, by divisions, or from divisions (§ 61021 & 61025).
- Voters can convert dependent CSDs into independent districts (§ 61022 & 61027).
- All CSDs boards of directors must have five directors (§ 61040).
- Directors set policy; general managers implement policy (§ 61040 & 61051).
- Directors serve staggered, four-year terms (§ 61042).
- Directors must follow formal procedures (§ 61043, 61044 & 61045).
- General managers have defined roles (§61002(f) & 61051)<sup>3</sup>.

## Functions

The California Government Code provides for a broad array of powers and authority for a community services district. With the notable exception of land use authority, a community services district can provide almost the same range of services as a city. A community services district can provide up to thirty-two (32) services. Each of the below mentioned specific powers must be approved by the Commission prior to service(s) being provided.

Within its boundaries, the specific powers (pursuant to Government Code Section 61100) a CSD board of directors may exercise, are as follows:

- (a) Supply water for any beneficial uses in the same manner as a municipal water district.
- (b) Collect, treat, or dispose of sewage, wastewater, recycled water, and storm water in the same manner as a sanitation district.
- (c) Collect, transfer, dispose of solid waste, and provide solid waste handling services, including, but not limited to, source reduction, recycling, and composting activities.
- (d) Provide fire protection services, rescue services, hazardous material emergency response services, and ambulance services in the same manner as a fire protection district.
- (e) Acquire, construct, improve, maintain, and operate recreation facilities, including, but not limited to, parks and open-space in the same manner as a recreation and park district.

- (f) Organize, promote, conduct, advertise programs of community recreation, in the same manner as a recreation and park district.
- (g) Acquire, construct, improve, maintain, and operate street lighting and landscaping on public property, public rights-of-way, and public easements.
- (h) Provide for the surveillance, prevention, abatement, and control of vectors and vectorborne diseases in the same manner as a mosquito abatement and vector control district.
- (i) Provide police protection and law enforcement services by establishing and operating a police department that employs peace officers.
- (j) Provide security services, including, but not limited to, burglar and fire alarm services, to protect lives and property.
- (k) Provide library services in the same manner as a library district.
- (l) Acquire, construct, improve, and maintain streets, roads, rights-of-way, bridges, culverts, drains, curbs, gutters, sidewalks, and any incidental work.
- (m) Convert existing overhead electric and communications facilities, with the consent of the public agency or public utility that owns the facilities, to underground locations.
- (n) Provide emergency medical services.
- (o) Provide and maintain public airports and landing places for aerial traffic in the same manner as an airport district.
- (p) Provide transportation services.
- (q) Abate graffiti.
- (r) Plan, design, construct, improve, maintain, and operate flood protection facilities.
- (s) Acquire, construct, improve, maintain, and operate community facilities, including, but not limited to, community centers, libraries, theaters, museums, cultural facilities, and child care facilities.
- (t) Abate weeds and rubbish.
- (u) Acquire, construct, improve, maintain, and operate hydroelectric power generating facilities and transmission lines, consistent with the district's water supply and wastewater operations. The power generated shall be used for district purposes, or sold to a public utility or another public agency that generates, uses, or sells electrical power. A district shall not acquire hydroelectric power generating facilities unless the facilities' owner agrees.



- (v) Acquire, construct, improve, maintain, and operate television translator facilities.
- (w) Remove snow from public streets, roads, easements, and rights-of-way.
- (x) Provide animal control services.
- (y) Control, abate, and eradicate pests, in the same manner as a pest abatement district.
- (z) Construct, maintain, and operate mailboxes on a district's property or rights-of-way.
- (aa) Provide mail delivery service under contract to the United States Postal Service.
- (ab) Own, operate, improve, and maintain cemeteries and provide interment services in the same manner as a public cemetery district.
- (ac) Finance the operations of area planning commissions formed pursuant to Section 65101.
- (ad) Finance the operations of municipal advisory councils formed pursuant to Section 31010.
- (ae) Acquire, own, improve, maintain, and operate land within or without the district for habitat mitigation or other environment protection purposes to mitigate the effects of projects undertaken by the district.
- (af) If a private person or entity is unable or unwilling to deploy broadband service, construct, own, improve, maintain, and operate broadband facilities and to provide broadband service. The district shall first make a reasonable effort to identify a private person or entity willing to deploy service. The authority granted by this subdivision shall expire when a private person or entity is ready, willing, and able to acquire, construct, improve, maintain, and operate broadband facilities and to provide broadband services, and to sell those services at a comparable cost and quality of service as provided by the district. At that time, the district shall do one of the following: (1) Diligently transfer its title, ownership, maintenance, control, and operation of those broadband facilities and services at a fair market value to that private person or entity, or (2) lease the operation of those broadband facilities at a fair market value to that private person or entity.

(Report continues on Page 10)

The new CSD Law in 2006 (SB 135) clarified three (3) existing specific powers.

Within its boundaries, the specific powers that a board of directors may exercise, as follows:

- A district may provide electricity if LAFCO designated the district as the successor to another special district that was extinguished as the result of any change or organization or reorganization, that other special district had provided electricity pursuant to the principal act under which that other special district had operated (Government Code Section 61102).
- A district that acquires, constructs, improves, and maintains streets, road rights-of-way, bridges, culverts, drains, curbs, gutters, sidewalks, and any incidental works pursuant to subdivision (l) of Section 61100 shall have the powers, duties, and authority of a county for those works (Government Code Section 61103).
- A district that acquires, constructs, improves, and maintains streets, road rights-of-way, bridges, culverts, drains, curbs, gutters, sidewalks, and any incidental works pursuant to subdivision (l) of Section 61100 may grant franchises (Government Code Section 61104).

A district may provide the facilities and services authorized by Section 61100 outside its boundaries, subject to approval by LAFCO for an Out-of-Agency Service Agreement (pursuant to Government Code Section 56133 and 61101). A district may provide new or extended services by contract or agreement outside its jurisdictional boundary only if it first requests and receives written approval from the Commission.

**Exercise of New or Different Functions or Classes of Services (formerly known as “activation of latent powers”)**

Prior to SB 135, “latent powers” meant those services and facilities authorized by Part 3 (commencing with Section 61100) that LAFCO has determined, pursuant to subdivision (h) of Section 56425, that a district did not provide prior to January 1, 2006.

New or different functions or classes of services are those powers authorized by the principal act under which the district was formed, but not currently exercised by a special district.

Commission proceedings for the exercise of new or different functions or classes of services or divestiture of power to provide particular functions or classes of services, within all or part of the jurisdictional boundaries of a special district, may be initiated by a resolution of application (pursuant to Government Code Section 56824.10).

(Report continues on Page 11)

***Plan for Services***

A special district shall submit a plan for services with an application. The plan for services must include this information (pursuant to Government Code Section 56653(b)):

- (1) An enumeration and description of the services to be extended in the affected territory.
- (2) The level and range of those services.
- (3) An indication of when those services can feasibly be extended to the affected territory.
- (4) An indication of any improvement or upgrading of structures, roads, sewer or water facilities, or other conditions the local agency would impose or require within the affected territory if the change of organization or reorganization is completed.
- (5) Information with respect to how those services will be financed.

The plan for services shall also include all of this information (pursuant to Government Code Section 56824.12(a)):

- (1) The total estimated cost to provide the new or different function or class of services within the special district's jurisdictional boundaries.
- (2) The estimated cost of the new or different function or class of services to customers within the special district's jurisdictional boundaries. The estimated costs may be identified by customer class.
- (3) An identification of existing providers, if any, of the new or different functions or class of services proposed to be provided and the potential fiscal impact to the customers of those existing providers.
- (4) A written summary of whether the new or different function or class of services or divestiture of the power to provide particular functions or classes of services, within all or part of the jurisdictional boundaries of a special district, pursuant to subdivision (b) of Section 56654, will involve the activation or divestiture of the power to provide a particular service or services, service function or functions, or class of services or services.
- (5) A plan for financing the establishment of the new or different function or class of services within the special district's jurisdictional boundaries.
- (6) Alternatives for the establishment of the new or different functions or class of services within the special district's jurisdictional boundaries.

The Commission shall not approve a proposal for the establishment of new or different functions or class of service unless the special district will have sufficient revenues to carry out the proposed new or different functions of class of services (Government Code Section 56824.14(a)) except as specified in Code Section 56824.14(1).

## Formation

A proposal to form a new district may be made by petition or by the adoption of a resolution of application by a legislative body of a county, city, or special district that contains any of the proposed territory to be included in the proposed district. The petition shall do all of the things required by Section 56700. Except for the provisions regarding the signers, the signatures, and the proponents, a resolution of application shall contain all of the matters specified for a petition in Section 61011. In addition, the petition shall include, (pursuant to Government Code Section 61011(a)), the following information:

- State which of the services listed in Section 61100 it is proposed that the district be authorized to provide upon formation.
- Set forth the proposed methods, including, but not limited to, special taxes, benefit assessments, and fee, by which the district will finance those services.
- Specify the method of selecting the initial board of directors, as provided in Chapter 1 (commencing with Section 61020) of Part 2.
- The petition shall be signed by not less than twenty-five percent (25%) of the registered voters residing in the area to be included in the district.

Prior to circulating petitions, the proponent shall file with the LAFCO Executive Officer a Notice of Intention that includes the name and mailing address of the proponent(s) and a written statement, not to exceed 500 words in length, setting forth the reasons for the proposal. After filing the Notice of Intention, the petition may be circulated for signatures (Government Code Section 61012).

The proposal to form a new district may also be made by the adoption of a resolution of application by the legislative body of any county, city, or special district that contains any of the territory proposed to be included in the district (Government Code Section 56859 & 61013).

After the formation proceedings have been initiated, LAFCO must conduct a noticed public hearing. After hearing public testimony, the Commission may either approve, modify, or deny the proposed formation. If it is approved, the Commission must also adopt terms and conditions for the formation, and establish a sphere of influence for the new district. The proposed formation is then scheduled for a protest hearing. At the protest hearing, the proceedings may be terminated if protested by fifty percent (50%) or more of the registered voters residing within the district. If no majority protest exists, the Commission shall either:

1. Order the formation subject to approval by the voters; or
2. Order the formation subject to approval by the voters of a special tax or by the property owners of a special benefit assessment.

(Report continues on Page 13)

With respect to the proposed boundaries of a community services district, the following territory may be included upon formation pursuant to Government Code Section 61007.

1. Incorporated and/or unincorporated territory;
2. Contiguous or non-contiguous territory; and
3. Within one or more counties.

Territory within another community services district or another type of special district that provides the same proposed level of services shall not be included in a community services district.

### **Annexation**

After a district has been formed, the boundaries of the district may be altered and outlying incorporated or unincorporated territory in one or more counties may be annexed into the district. Proceedings are to be initiated pursuant to Section 56000, et seq. of the Government Code.

### **CSDs in Los Angeles County**

There are three (3) community services districts located in the County of Los Angeles:

- Bradbury Estates Community Services District;
- Pasadena Glen Community Services District; and
- Point Dume Community Services District (MSR will be completed at a later date.)

(Report continues on Page 14)

### Chapter Three: Bradbury Estates Community Services District

The Bradbury Estates Community Services District (BECSD) was formed by LAFCO on December 28, 1995.

The population within the boundaries of the BECSD in 2010 (the most recent year for which data is available) was 370.<sup>4</sup> The BECSD is 858 acres (or 1.34 square miles) in size with a population density of 276 persons per square mile.

The BECSD consists of 146 parcels. Of the 146 parcels, 108 are assessed parcels (single-family homes). The remaining 38 parcels are vacant lots (mostly inaccessible due to steep terrain), open-space; and flood control and debris basins (located in the northeastern portion of the BECSD boundaries, south of the Angeles National Forest).

The BECSD's boundaries include one of two distinct gated communities located in the City of Bradbury (City), the Bradbury Estates. The second gated community, Woodlyn Lane, is not within the BECSD's boundaries. Of the total 858 acres within the BECSD, 833 acres is the gated community of Bradbury Estates and the remaining twenty-five (25) acres are vacant lots, open-space, and flood control and debris basins, located within the northern and western portions of the City.

The Bradbury Estates Community Services District and its Coterminous SOI boundaries includes sixty-eight percent (68%) of the City of Bradbury, and a small area within the City of Monrovia consisting of four (4) parcels and a portion of one (1) parcel (Reorganization No. 2016-08 to the City of Bradbury). The BECSD's boundaries are generally located south and east of the City of Monrovia, south of the Angeles National Forest, west of the City of Duarte; and south and southeast of the City of Bradbury (see Existing Bradbury Estates Community Services District Sphere of Influence, Exhibit 1, on Page 16). The topography of the BECSD includes flat areas, as well as steep hillside and mountainous terrain in various locations.

In 1994, a proposal was submitted to LAFCO by registered voter petition to form a community services district within a portion of the City of Bradbury, a small residential equestrian community located at the base of the San Gabriel Mountains. A portion of the BECSD boundary includes a former City of Bradbury special municipal tax district boundary which existed from 1973 to 1992. From 1993 to 1995, patrol services to the Bradbury Estates area were financed through a voluntary homeowner's association. The former City municipal tax district boundary plus additional territory formed the BECSD boundaries.<sup>5</sup>

The purpose of the BECSD is to provide a higher level of special patrol services, landscape maintenance, and road maintenance to the Bradbury Estates. This includes 24-hour security patrol, maintenance of all streets within the gated community, and landscape maintenance at the entryway and guard post.

(Report continues on Page 15)

## Active Powers

Active powers are defined as authorized functions and services that are already being provided by a special district within its boundaries.

The Bradbury Estates Community Services District is authorized to provide the following services:

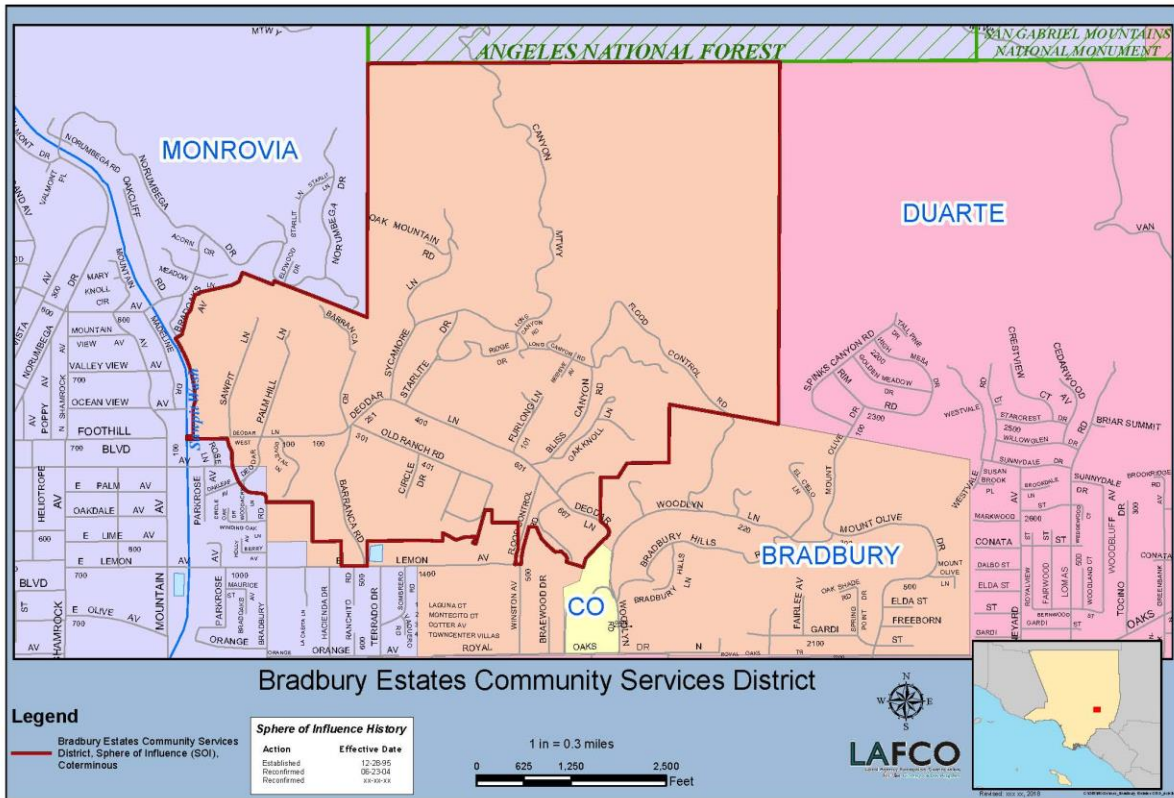
- Acquire, construct, improve, maintain, and operate street lighting and landscaping on public property, public rights-of-way, and public easements (Government Code Section 61100(g)). BECSD maintains a landscaped public easement at a gated entryway and a guard post into the Bradbury Estates.
- Provide security services, including, but not limited to, burglar and fire alarm services, to protect life and property (Government Code Section 61100(j)). Securitas uniformed security guards are stationed 24 hours a day, 7 days a week, at a guard post at the gated entryway of the Bradbury Estates. The security guards monitor the entrance with closed circuit cameras, monitor incoming vehicles and delivery services, conduct perimeter checks, and provide overnight parking passes to guests who are visiting residents within the Bradbury Estates.
- Acquire, construct, improve, and maintain streets, roads, rights-of-way, bridges, culverts, drains, curbs, gutters, sidewalks, and incidental work (Government Code Section 61100(l)). BECSD provides road construction, maintenance, repair, and street sweeping of all rights-of-way.

Any and all other powers not identified above, which the BECSD may propose to exercise, are considered to be new or different functions or classes of services (also known as “inactive powers” or “latent powers”). The BECSD is prohibited from exercising such new or different functions or classes of services without the advance, written approval of the Commission pursuant to Government Code Sections 56824.10 through 56824.14, inclusive, and as addressed elsewhere in the Act.

(Report continues on Page 16)

Exhibit 1

Existing Bradbury Estates Community Services District Sphere of Influence



(THIS SPACE INTENTIONALLY LEFT BLANK)



## Bradbury Estates Community Services District

### Discussion and Determinations

Government Code Section 56430 requires LAFCO to “conduct a service review of the municipal services” and to “prepare a written statement of its determinations” relative to several factors. This chapter addresses these factors and includes the recommended determinations.

#### Population Projections

According to the United States Census Bureau, the 2010 population of the Bradbury Estates Community Services District was 370.<sup>6</sup> The BECSD consists of a combination of large estate single-family homes, open-space; and flood control and debris basins, that is largely built-out.

The population within the SOI boundary within the Bradbury Estates Community Services District is unlikely to grow significantly over the next twenty (20) years.

#### **Determinations:**

- **Bradbury Estates Community Services District is in a suburban area that is largely built-out.**
- **The population is unlikely to grow significantly over the next twenty (20) years.**

#### Disadvantaged Unincorporated Communities

Pursuant to the State’s passage of Senate Bill 244, as of January 1, 2012, LAFCOs are required to make determinations regarding Disadvantaged Unincorporated Communities (DUCs) for an Update of a Sphere of Influence. The law defines a DUC as a community with an annual median household income that is less than eighty percent (80%) of the statewide annual median household income. The law also requires that LAFCOs consider “the location and characteristics of any disadvantaged communities within or contiguous to the sphere of influence” when preparing an MSR.

The Bradbury Estates Community Services District does not contain any unincorporated areas within its boundaries. There is one (1) small unincorporated area contiguous to the Bradbury Estates Community Services District and its SOI, located south of the BECSD and its SOI, but it does not contain a DUC.

#### **Determinations:**

- **There is no impact upon the location and characteristic of any Disadvantaged Unincorporated Communities (DUCs) because there are no DUCs within or contiguous to the Bradbury Estates Community Services District and its SOI.**

- **The Bradbury Estates Community Services District does not provide three core governmental services (water, wastewater, and structural fire protection) which are the focus of State Law concerning DUCs.**

Present and Planned Capacity of Public Facilities

The Bradbury Estates Community Services District owns and maintains two (2) parcels which consist of a guard post and landscaped public easements, at the intersection of East Oak Leaf Avenue and East Wildrose Avenue.

The BECSD has no employees, and contracts out for the following services: security services with Securitas (a company that provides a full spectrum of security services, officers, and technology); street sweeping; landscaping; and accounting services.<sup>7</sup>

The Bradbury Estates Community Services District's Board of Directors does not employ nor contract out for a General Manager.

Securitas uniformed security guards are stationed 24 hours a day, 7 days a week, at a guard post at the gated entryway of the Bradbury Estates. The security guards monitor the entrance with closed circuit cameras, monitor incoming vehicles and delivery services, conduct perimeter checks, and provide overnight parking passes to guests who are visiting residents within the Bradbury Estates.<sup>8</sup>

The City of Monrovia and the City of Bradbury entered into a Memorandum of Understanding (MOU) on January 17, 2017 to implement a Community Service Officer (CSO) program. This MOU agreement is paid by the City of Bradbury to the City of Monrovia to employ a City of Monrovia non-sworn part-time CSO who performs field-related public safety work within the entire City of Bradbury, including the gated area of Bradbury Estates. The CSO reports directly to the City of Monrovia Police Department. The CSO provides a full-service investigation of crimes that have already occurred which have little or no workable leads, including evidence collection (photographs, fingerprinting, DNA, etc.); enforces some municipal code violations; investigates non-injury traffic collisions; enforces parking restrictions; and performs other duties as negotiated. The CSO program remains in effect until June 30, 2018, at which time both cities may elect to renew the program.<sup>9</sup>

The City of Bradbury contracts with the Los Angeles County Sheriff's Department which provides general law enforcements services within the City of Bradbury, including the Bradbury Estates.<sup>10</sup>

Bradbury Estates Community Services District representatives do not anticipate any potential expansion of service or service delivery.<sup>11</sup>

BECSD representatives do not have any existing issues or problems with service delivery, equipment, or long-term capital improvements forecasted.<sup>12</sup>

The BECSD has provided services effectively for over two (2) decades. There is minimal new development within the Bradbury Estates Community Services District's SOI.

**Determination:**

- **At this time, the Bradbury Estates Community Services District has the ability to serve the needs of the BECSD.**

Financial Ability of Agencies to Provide Services

The BECSD’s Fiscal Year 2016-2017 (most recent budget available) budget summary reflects \$580,996 in revenue (special assessments and interest income) and \$378,046 in expenses (\$254,276 in security services; \$62,146 in maintenance (roads and landscape); \$31,155 in business expenses; and \$30,469 in utilities) for a year-end balance of \$202,949.<sup>13</sup>

The BECSD has no long-term debt.<sup>14</sup>

The BECSD does not receive a portion of the 1% ad-valorem property tax. The BECSD is funded exclusively through property tax assessments.

For the Fiscal Year 2016-2017, the Bradbury Estates Community Services District received an assessment of \$5,140 per parcel. With 108 parcels assessed at \$5,140 per parcel, the BECSD received \$555,120 in assessments.<sup>15</sup>

In 1995, when the BECSD was originally formed/established, the BECSD levied a property tax assessment not to exceed \$1,500 per year, per parcel.<sup>16</sup> In 1998, the BECSD held a special election and the voters within the BECSD approved a measure which: one, eliminated the maximum assessment of \$1,500 per year; two, authorized the BECSD Board of Directors to increase the annual assessment per parcel, up to a maximum of two percent (2%) each year; and three, empowered the Board to “re-capture” the 2% assessment in later years for prior years in which no increase was assessed.<sup>17</sup> Depending on the BECSD’s budgetary needs, the Board reconsiders the rate of assessment every year.<sup>18</sup>

In 1998, the assessment was \$3,600 per parcel.<sup>19</sup> The current assessment (FY 2017-2018) is \$5,140 per parcel.<sup>20</sup>

The chart below shows the annual assessment for the last four (4) fiscal years.

Bradbury Estates Community Services Benefit Assessment (based on per parcel, per year)	
<u>Fiscal Year</u>	<u>Amount</u>
2014-2015	\$4,800
2015-2016	\$4,800
2016-2017	\$5,140
2017-2018	\$5,140

**Determination:**

- **The Bradbury Estates Community Services District has the financial ability to continue providing services at the current year budget levels.**

**Status of, and Opportunities for, Shared Facilities**

Together with the City of Bradbury Planning and Building Departments and the Bradbury Estates Association, development activity within the Bradbury Estates Community Services District is subject to review and approval by the BECSD Board of Directors before any construction activity is undertaken that may impact the existing or proposed street system, drainage system, or police or security services.<sup>21</sup>

**Determinations:**

- **The Bradbury Estates Community Services District works directly with the City of Bradbury and the Bradbury Estates Association to review and approve proposed new development and construction activities within the BECSD.**
- **There are no additional opportunities for shared facilities or services.**

**Accountability for Community Service Needs**

The governing body of Bradbury Estates Community Services District consists of a five-member Board of Directors. Board-members are elected by district, and they do not receive stipends.<sup>22</sup>

The Board of Directors conducts meetings at the Bradbury City Hall at 600 Winston Avenue, Bradbury, California, 91008 at 7:00 p.m. Board agendas are posted at the entryway guard post and at Bradbury City Hall. Notices of meetings are mailed to the residents within the BECSD. The Board meets twelve (12) times a year.<sup>23</sup>

The Bradbury Estates Community Services does not maintain a website. The City of Bradbury's website lists the board's president with contact information for the BECSD<sup>24</sup>.

**Determination:**

- **The Bradbury Estates Community Services District provides effective communication by posting Board agendas at the entryway guard post and at Bradbury City Hall, and notices of meetings are mailed to the residents within the BECSD. Given the limited number of assessed parcels (108 assessed parcels), and the fact that mailed notice is provided in advance of each meeting, a website is not necessary at this time.**

Other Matters

None.

**Determination:**

(No additional determinations)

(Report continues on Page 22)

(THIS SPACE INTENTIONALLY LEFT BLANK)

**Bradbury Estates Community Services District****SOI Recommendation***Bradbury Estates Community Services District SOI Recommendation:*

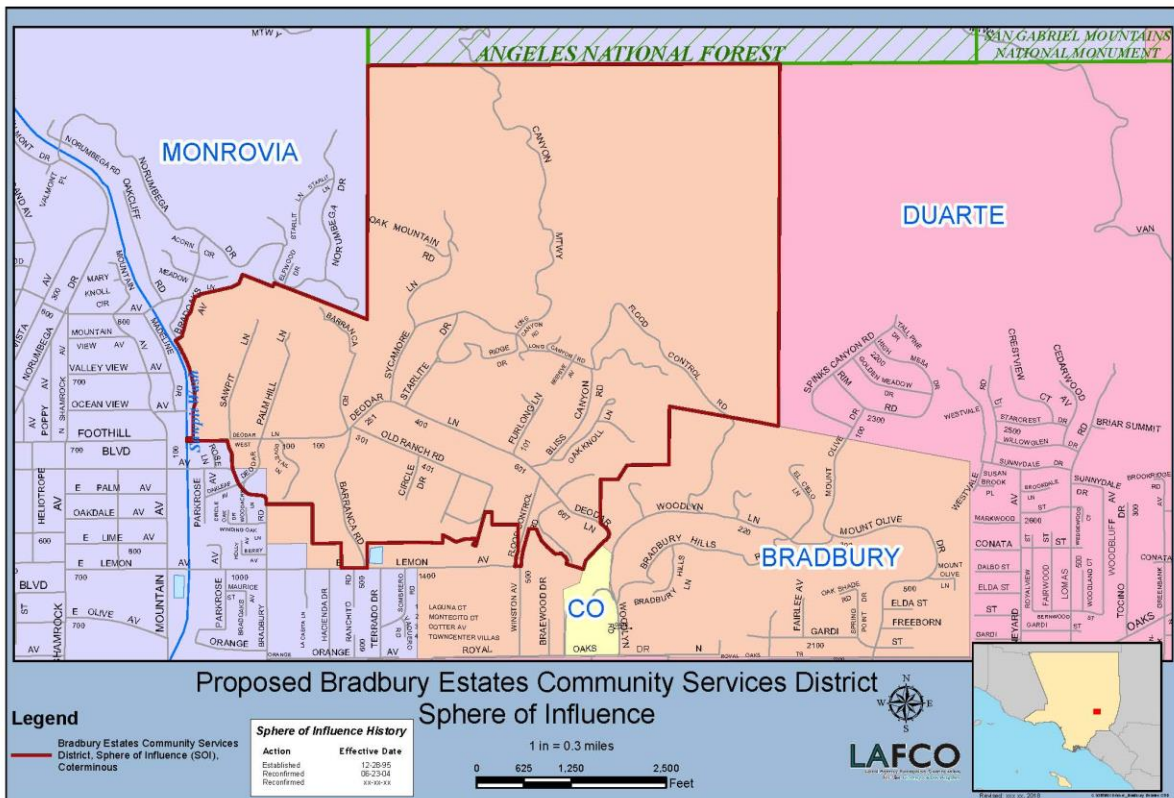
- **Reconfirm Bradbury Estates Community Services District's Existing Coterminous Sphere of Influence.** The Bradbury Estates Community Services District's Existing Coterminous SOI was established on December 28, 1995. On June 23, 2004, the Commission reconfirmed the Coterminous SOI in the course of adopting the Miscellaneous Government Services Municipal Service Review (see Bradbury Estates Community Services District Sphere of Influence, Exhibit 1, on Page 16). The Bradbury Estates Community Services District has no paid staff (all services are contracted out), and the BECSD's Board does not intend to make changes to its boundary. Future changes to the SOI boundaries are unlikely; LAFCO staff therefore recommends that the Commission reconfirm the existing Coterminous SOI for the Bradbury Estates Community Services District (see Proposed Bradbury Estates Community Services District Sphere of Influence, Exhibit 2, on Page 23).

(Report continues on Page 23)

(THIS SPACE INTENTIONALLY LEFT BLANK)

Exhibit 2

Proposed Bradbury Estates Community Services District Sphere of Influence



(THIS SPACE INTENTIONALLY LEFT BLANK)

## Chapter Four: Pasadena Glen Community Services District

The Pasadena Glen Community Services District (PGCSD) was formed by LAFCO on June 27, 1994.

The population within the boundaries of the PGCSD in 2010 (the most recent year for which data is available) was 126.<sup>25</sup> The PGCSD is 26.20 acres (or 0.04 square miles) in size.

The PGCSD consists of 92 parcels. Of the 92 parcels, 65 are assessed parcels. The remaining 27 parcels are vacant lots, open-space; and flood control and debris basins. There are 56 single-family homes with the boundaries of the PGCSD<sup>26</sup>.

The Pasadena Glen Community Services District and its Coterminous SOI boundaries are located in unincorporated territory known as Pasadena Glen; south and west of the Angeles National Forest, and northeast of the City of Pasadena. The PGCSD's boundaries include the roadways of Pasadena Glen Road, Shaw Ranch Road, and portions of Old Grove Road and Vosburg Street (see Existing Pasadena Glen Community Services District Sphere of Influence, Exhibit 3, on Page 26). The topography of the PGCSD consists of hillside and canyons.

In October of 1993, a fire swept through the community of Pasadena Glen and destroyed 28 of the 65 homes in the area. In 1994, a proposal was submitted to LAFCO by registered voter petition to form a community services district. In addition to the immediate damage caused by the fire, the community continued to suffer from severe flooding as a result of the erosion from barren hillsides. In order for the homeowners to rebuild their destroyed homes, Los Angeles required that the community demonstrate a financial capability to fund the necessary road and flood control improvements.<sup>27</sup>

The purpose of the PGCSD is to construct, fund, and maintain the roadway (Pasadena Glen Road), including street turnouts for fire engine access and; to construct, fund, and maintain the storm water culverts (under Pasadena Glen Road and at the Winifred Canyon runoff) to divert the flow of water and mud away from residential homes and roads within the PGCSD.<sup>28</sup> Pasadena Glen Road is the primary access point to the community.

### Active Powers

Active powers are defined as authorized functions and services that are already being provided by a special district within its boundaries.

The Pasadena Glen Community Services District is authorized to provide the following services:

- Acquire, construct, improve, and maintain streets, roads, rights-of-way, bridges, culverts, drains, curbs, gutters, sidewalks, and incidental work (Government Code Section 61100(l)). PGCSD maintains Pasadena Glen Road, Old Grove Road, and Shaw Ranch Road, including street turnouts for fire engine access and; to construct, fund, and maintain the storm water culverts (under Pasadena Glen Road and at the Winifred Canyon runoff) to divert the flow of water and mud away from residential homes and roads within the PGCSD.



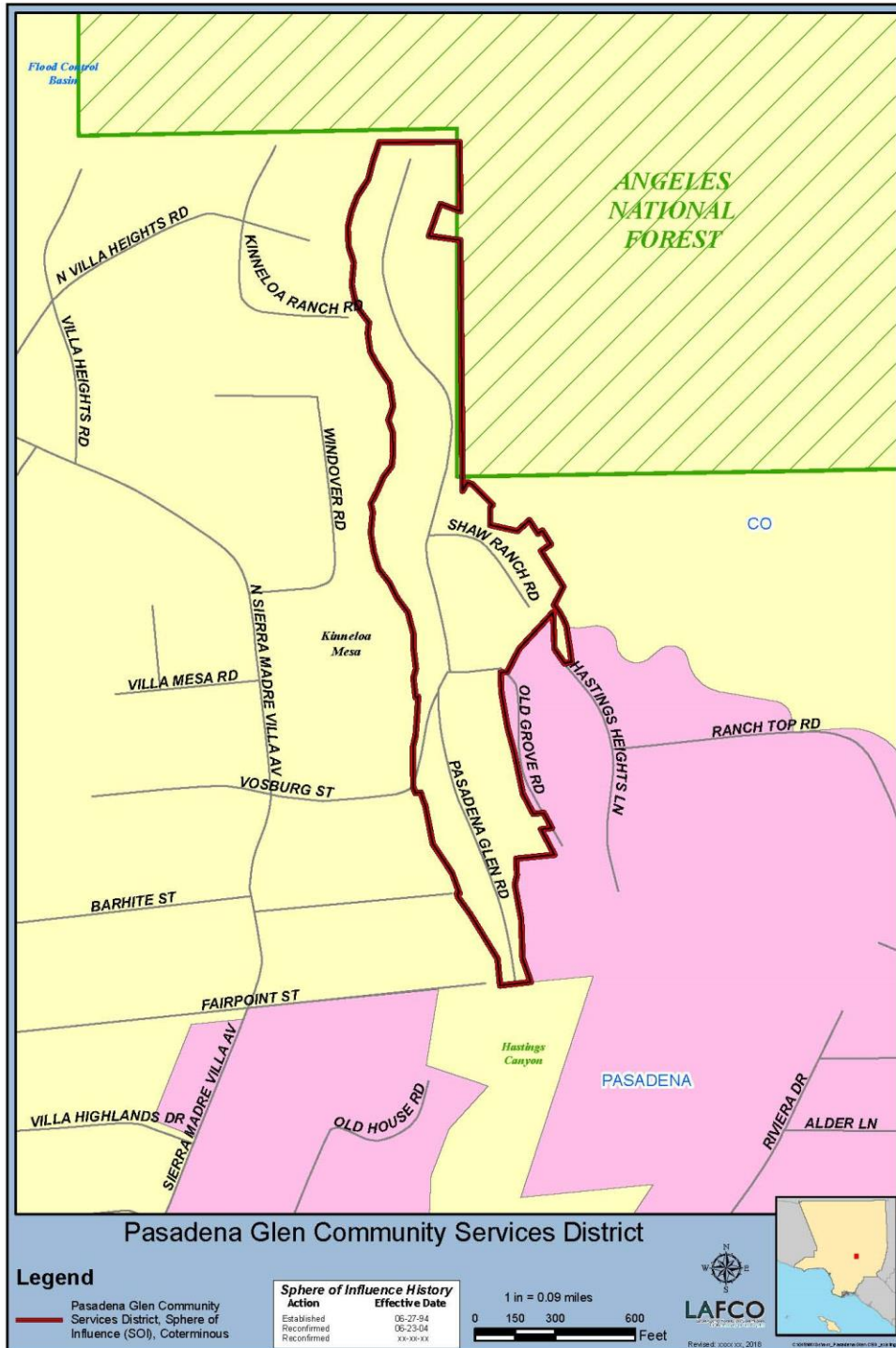
Any and all other powers not identified above, which the PGCSD may propose to exercise, are considered to be new or different functions or classes of services (also known as “inactive powers” or “latent powers”). The PGCSD is prohibited from exercising such new or different functions or classes of services without the advance, written approval of the Commission pursuant to Government Code Sections 56824.10 through 56824.14, inclusive, and as addressed elsewhere in the Act.

(Report continues on Page 26)

(THIS SPACE INTENTIONALLY LEFT BLANK)

Exhibit 3

Existing Pasadena Glen Community Services District Sphere of Influence



## Pasadena Glen Community Services District

### Discussion and Determinations

Government Code Section 56430 requires LAFCO to “conduct a service review of the municipal services” and to “prepare a written statement of its determinations” relative to several factors. This chapter addresses these factors and includes the recommended determinations.

#### Population Projections

According to the United States Census Bureau, the 2010 population of the Pasadena Glen Community Services District was 126.<sup>29</sup> The PGCSD consists of a combination of large estate single-family homes; and flood control and debris basins, that is largely built-out.

The population within the SOI boundary within the Pasadena Glen Community Services District is unlikely to grow significantly over the next twenty (20) years.

#### **Determinations:**

- **Pasadena Glen Community Services District is in a suburban area that is largely built-out.**
- **The population is unlikely to grow significantly over the next twenty (20) years.**

#### Disadvantaged Unincorporated Communities

Pursuant to the State’s passage of Senate Bill 244, as of January 1, 2012, LAFCOs are required to make determinations regarding Disadvantaged Unincorporated Communities (DUCs) for an Update of a Sphere of Influence. The law defines a DUC as a community with an annual median household income that is less than eighty percent (80%) of the statewide annual median household income. The law also requires that LAFCOs consider “the location and characteristics of any disadvantaged communities within or contiguous to the sphere of influence” when preparing an MSR.

The Pasadena Glen Community Services District is located entirely within unincorporated territory, but there are no DUCs within that unincorporated area. There is unincorporated territory, located north, northeast, west, and south, contiguous to the Pasadena Glen Community Services District and its SOI, but there are no DUCs within the unincorporated area.

#### **Determinations:**

- **There is no impact upon the location and characteristic of any Disadvantaged Unincorporated Communities (DUCs) because there are no DUCs within or contiguous to the Pasadena Glen Community Services District and its SOI.**

- **The Pasadena Glen Community Services District does not provide three core governmental services (water, wastewater, and structural fire protection) which are the focus of State Law concerning DUCs.**

#### Present and Planned Capacity of Public Facilities

The PGCSD has no employees, and contracts out for the following services: road and culvert maintenance, brush removal, general management, legal services, and accounting services.<sup>30</sup>

The Pasadena Glen Community Services District Board of Directors contracts out for a General Manager.<sup>31</sup>

Pasadena Glen Community Services District representatives do not anticipate any potential expansion of service or service delivery.<sup>32</sup>

PGCSD representatives indicated that there are existing issues or problems with maintenance of the roads resulting from private construction or other heavy uses. The PGCSD is responsible for maintaining roads within its boundaries, but is faced with a challenge due to activities that cause damage or deterioration to the roads. The Board of Directors is considering adopting an ordinance by requiring an encroachment permit for construction activities. Collecting these permit fees from construction activities will offset maintenance costs incurred by the PGCSD.<sup>33</sup>

The PGCSD has been serving the area effectively for over two (2) decades. During that time the culverts and roadways have proven to be adequate for the community's needs. There is minimal new development within the Pasadena Glen Community Services District's SOI.

#### **Determinations:**

- **The Pasadena Glen Community Services District's public facilities are adequate to meet the needs of the Pasadena Glen community.**
- **The Pasadena Glen Community Services District Board of Directors should continue its consideration of adopting an encroachment permit/fee to offset impacts upon Pasadena Glen Road from outside parties.**

#### Financial Ability of Agencies to Provide Services

The PGCSDs five-year financial statement ending June 30, 2014 (most recent budget available) started with \$63,554; reflects \$32,385 in revenue and \$19,378 in expenses with an excess of revenues over expenses of \$13,007 for a fiscal year-end balance of \$76,561.<sup>34</sup>

The PGCSDs Fiscal Year 2013-2014 ending June 30, 2014 reflects a balance of \$76,561 in the PGCSD checking and savings accounts.<sup>35</sup>

The PGCSD has no long-term debt.<sup>36</sup>

The PGCSO does not receive a portion of the 1% ad-valorem property tax. The PGCSO is funded exclusively through property tax assessments.

For Fiscal Year 2013-2014, PGCSO received \$32,301 in assessments.<sup>37</sup>

At formation, the PGCSO is authorized to levy an annual benefit assessment of \$500 per parcel. Assessments have not increased since the PGCSO was formed in 1994. The Board has no plans to increase the assessment at this time.<sup>38</sup>

**Determination:**

- **The Pasadena Glen Community Services District has the financial ability to continue to provide services to the residents within the Pasadena Glen area at current budget levels.**

*Status of, and Opportunities for, Shared Facilities*

The PGCSO provides limited services which directly benefit a small number of homeowners in the Pasadena Glen community. The PGCSO has maintained its limited public facilities consistently and adequately since the District's formation through the collection of assessments upon homeowners in Pasadena Glen. There are no apparent opportunities to share facilities with other agencies.

**Determination:**

- **There are no apparent opportunities to share facilities with other agencies.**

*Accountability for Community Service Needs*

The governing body of the Pasadena Glen Community Services District consists of a five-member Board of Directors, residents who live within the boundaries of the PGCSO. Board-members are elected at-large, and do not receive stipends.<sup>39</sup>

The Board of Directors conducts meetings on the fourth Tuesday of each month. Board agendas are posted at the community bulletin board at the entry point into Pasadena Glen. The PGCSO does not own or lease any property and therefore each meeting is held at a different location within the PGCSO's boundaries. Meetings are typically held at the home of one of the Board members. The Board meets twelve (12) times a year.<sup>40</sup>

The Pasadena Glen Community Services District does not maintain a website.

**Determination:**

- **The Pasadena Glen Community Services District provides effective communication by posting Board agendas at the community bulletin board at the entry point into Pasadena Glen. Given the limited number of assessed parcels (65**

assessed parcels), and existing noticing practices, a website is not necessary at this time.

Other Matters

None.

**Determination:**

(No additional determinations)

(Report continues on Page 31)

(THIS SPACE INTENTIONALLY LEFT BLANK)

**Pasadena Glen Community Services District****SOI Recommendation***Pasadena Glen Community Services District SOI Recommendation:*

- **Reconfirm Pasadena Glen Community Services District's Existing Coterminous Sphere of Influence.** The Pasadena Glen Community Services District's Existing Coterminous SOI was established on June 27, 1994. On June 23, 2004, the Commission reconfirmed the Coterminous SOI in the course of adopting the Miscellaneous Government Services Municipal Service Review (see Existing Pasadena Glen Community Services District Sphere of Influence, Exhibit 3, on Page 26). The Pasadena Glen Community Services District has no paid staff (all services are contracted out), and the PGCSO's Board does not intend to make changes to its boundary. Future changes to the SOI boundaries are unlikely; LAFCO staff therefore recommends that the Commission reconfirm the existing Coterminous SOI for the Pasadena Glen Community Services District (see Proposed Pasadena Glen Community Services District Sphere of Influence, Exhibit 4, on Page 32).

(Report continues on Page 32)

(THIS SPACE INTENTIONALLY LEFT BLANK)





**Chapter Five: Point Dume Community Services District**

**CHAPTER FIVE TO BE ADDED LATER**

**Community Services Districts  
Municipal Service Review**

**Footnotes**

Footnotes:

1. *Community Needs, Community Services: A Legislative History of SB 135 (Kehoe) and the "Community Services District Law"*, Senate Local Government Committee, March 2006, Page 1.
2. *About Special Districts Guide*, California Special Districts Association, Last Updated: January 1, 2016; Page 2.
3. *Community Needs, Community Services: A Legislative History of SB 135 (Kehoe) and the "Community Services District Law"*, Senate Local Government Committee, March 2006, Page 3.
4. 2010 United States Census Bureau data.
5. Local Agency Formation Commission for the County of Los Angeles, Agenda, March 8, 1995.
6. 2010 United States Census Bureau data.
7. E-mail from Richard Hale, City Council Member, City of Bradbury, to Alisha O'Brien; July 7, 2017.
8. Telephone conversation with Richard Hale, City Council Member, City of Bradbury; August 9, 2017.
9. Memorandum of Understanding Agreement, dated January 17, 2017, between the City of Monrovia and the City of Bradbury.
10. Telephone conversation with Kevin Kearney, City Manager, City of Bradbury; September 14, 2017.
11. E-mail from Richard Hale, City Council Member, City of Bradbury, to Alisha O'Brien; July 7, 2017.
12. Ibid.
13. Bradbury Estates Community Services District, Fiscal Year 2016-2017 Budget, CSD Income & Expenses, Page 2.

14. Telephone conversation with Richard Hale, City Council Member, City of Bradbury; August 9, 2017.
15. Bradbury Estates Community Services District, Fiscal Year 2016-2017 Budget, CSD Income & Expenses, Page 2.
16. Local Agency Formation Commission for the County of Los Angeles, Agenda, March 8, 1995.
17. Resolution No. 98-6-2 A Resolution of the Board of Directors of the Bradbury Estates Community Services District Tabulating Assessment Ballots, Finding that a Majority Protest was not Made, Confirming the Increased Assessment and Directing Recordation of a Notice of Assessment; and accompanied Second Amendment to Engineer's Report for the Bradbury Estates Community Services District Cities of Bradbury & Monrovia, State of California, June 1998.
18. Telephone conversation with Richard Hale, City Council Member, City of Bradbury; August 9, 2017.
19. Resolution No. 98-6-2 A Resolution of the Board of Directors of the Bradbury Estates Community Services District Tabulating Assessment Ballots, Finding that a Majority Protest was not Made, Confirming the Increased Assessment and Directing Recordation of a Notice of Assessment; and accompanied Second Amendment to Engineer's Report for the Bradbury Estates Community Services District Cities of Bradbury & Monrovia, State of California, June 1998.
20. Bradbury Estates Community Services District, Fiscal Year 2016-2017 Budget, CSD Income & Expenses, Page 2.
21. *Bradbury Estates Community Services District Ordinance No. 14-01 Attachment "A" Design Guidelines*, May 12, 2014, Page 4.
22. E-mail from Richard Hale, City Council Member, City of Bradbury; September 26, 2017.
23. Telephone conversation with Richard Hale, City Council Member, City of Bradbury; August 9, 2017.
24. City Hall, County, State and Fed Resources, City of Bradbury Website; August 17, 2017.
25. 2010 United States Census Bureau data.
26. Letter from Michael Maurer (Associate, Best Best & Krieger) to Alisha O'Brien (Government Analyst, LAFCO); of December 5, 2017.
27. Local Agency Formation Commission for the County of Los Angeles, Agenda, April 27, 1994.

28. Letter from Michael Maurer (Associate, Best Best & Krieger) to Alisha O'Brien (Government Analyst, LAFCO); of December 5, 2017.
29. 2010 United States Census Bureau data.
30. Letter from Michael Maurer (Associate, Best Best & Krieger) to Alisha O'Brien (Government Analyst, LAFCO); of December 5, 2017.
31. Letter from Michael Maurer (Associate, Best Best & Krieger) to Paul Novak (Executive Officer, LAFCO); of September 1, 2017.
32. Ibid.
33. Ibid.
34. Pasadena Glen Community Services District, Statements of the Last Five Years ended June 30, 2014, Statement of Activities, Page 7.
35. Pasadena Glen Community Services District, Statements of the Last Five Years ended June 30, 2014, Statement of Activities, Page 8.
36. Letter from Michael Maurer (Associate, Best Best & Krieger) to Alisha O'Brien (Government Analyst, LAFCO); of December 5, 2017.
37. Pasadena Glen Community Services District, Statements of the Last Five Years ended June 30, 2014, Statement of Activities, Page 7.
38. Letter from Michael Maurer (Associate, Best Best & Krieger) to Alisha O'Brien (Government Analyst, LAFCO); of December 5, 2017.
39. Letter from Michael Maurer (Associate, Best Best & Krieger) to Paul Novak (Executive Officer, LAFCO); of September 1, 2017.
40. Ibid.