

LAFCO

Santa Barbara Local Agency Formation Commission

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February 4, 2021 (Agenda)

Local Agency Formation Commission
105 East Anapamu Street
Santa Barbara CA 93101

The Purpose and Intent of a Sphere of Influence and Municipal Service Reviews

Dear Members of the Commission

RECOMMENDATION

This item is informational only and does not require action by the Commission.

SUMMARY

This report is intended to facilitate a discussion about the intent and purpose of the Sphere of Influence (SOI), what determinations are required and what parameters SBLAFCO uses to establish an SOI. Attached for your consideration are the SBLAFCO policies regarding the SOI and Municipal Service Review (MSR).

BACKGROUND

In 1972, LAFCOs were given the power to determine spheres of influence for all local governmental agencies. Factors considered in a sphere of influence review focus on the current and future land use, the current and future need and capacity for service, and any relevant communities of interest. A sphere of influence is a planning boundary outside of an agency's legal boundary (such as the city limit line) that designates the agency's probable future boundary and service area. The Cortese-Knox-Hertzberg (CKH) Act requires spheres for all cities and special districts to be reviewed every five years, or as necessary. Here is the CKH Act definition of a SOI:

56076. "Sphere of influence" means a plan for the probable physical boundaries and service area of a local agency, as determined by the commission.

PURPOSE

The purpose of the sphere of influence is to ensure the provision of efficient services while discouraging urban sprawl and the premature conversion of agricultural and open space lands. The SOI helps to organize and rationalize services and development by identifying areas that might reasonably be served by a jurisdiction. Commissions cannot tell agencies what their planning and land use goals should be. Rather, on a regional level, LAFCOs coordinate the orderly development of a community by reconciling differences between agency plans so that the most efficient urban service arrangements are created for the benefit of area residents and property owners.

SBLAFCO'S PRACTICE

Generally, the way SBLAFCO has established spheres of influence is to implement our local policies (under Policy II attached) and prepares a Municipal Service Review (MSR) if deemed necessary.

The future goal of SBLAFCO's MSR Program would be to prepare a municipal service review that provides information about the services provided by a jurisdiction in order to help support the Sphere of Influence decision. The SOI and MSR Update go hand in hand in making decisions about the SOI.

The LAFCO Staff would also facilitate development of a Memorandum of Agreement (MOA) (primarily for Cities) between the County and jurisdiction that identifies the SOI and contains other terms and provisions for future development. If the City and County come to an agreement on an MOA, LAFCO is required to give great weight to the MOA when considering SOIs. Through the MOA process, often Study Areas and areas of interest are considered under local policy. Areas of interest also may serve as planning referral lines between the County and Cities for discretionary land use entitlements. Areas of interest are reviewed and updated periodically when an SOI/MSR Update is prepared. Areas of interest can be separate from study areas, greenbelts, and spheres of influence. Some cities have studied areas of interest as part of their General Plan update process.

Study Areas will be used by LAFCO to analyze a specific territory that may be considered when establishing a sphere of influence. These areas get greater focus and review of the criteria listed below. Analysis such as agricultural contracts, prime farmland, soil classification, crop data among others are gathered to inform LAFCO about the areas' need for urban services or protection from loss of agricultural and open

space to meet SBLAFCO's purpose. It is also important, but not required, that a jurisdiction has a plan for the future of a particular Study Area.

As mentioned above, SBLAFCO defines a sphere of influence as, "a plan for the probable physical boundaries and service area of a local agency, as determined by the Commission." Typically, a sphere of influence is the territory a city or district is expected to annex in the future. Thus, spheres of influence are usually larger in area than the actual boundaries of a city or district, although they can be the same as the city or district boundaries. *Spheres of Influence do not give a jurisdiction any more legal authority or regulatory control in a particular area and should not be used as a protective or defensive boundary.* Annexation may be made only if the property to be annexed is within the sphere of influence of the annexing agency.

LAFCO'S ROLE, PROCESS, CRITERIA AND DETERMINATIONS

LAFCO Role. The CKH Act establishes procedures for local government changes of organization, including city incorporations, annexations to a city or special district, and city and special district consolidations. Local Agency Formation Commissions have numerous powers under the CKH Act, but those of primary concern are the power to act on local agency boundary changes and to adopt spheres of influence for local agencies. Among the purposes of LAFCOs are the discouragement of urban sprawl and the encouragement of the orderly formation and development of local agencies. SBLAFCO has responsibility in the following areas affecting local government in the county:

1. To discourage urban sprawl and encourage the orderly growth and development of local government agencies.
2. To prevent premature conversion of agricultural and open space lands.
3. To review and approve or disapprove proposals for changes in the boundaries and organization of the 8 cities, 42 independent special districts and approximately 12 county-governed special districts plus incorporations of cities and formations of new special districts.
4. To establish and periodically update spheres of influence future boundary, organization and service plans for the county's cities and special districts.
5. To perform and assist in studies of local government agencies with the goal of improving efficiency and reducing costs of providing services.

The CKH Act specifies the process that LAFCOs must follow and outlines the written determinations LAFCOs must make in order to update or amend a sphere of influence under Section 56430. This code section includes seven factors (Factors of Analysis for each are provided in Exhibit B). The Governor's Office of Planning and Research have developed Guidelines (2003) for preparing service reviews (Exhibit C). The Service Review must contain information and written determinations regarding each of the factors provided in the Service Review which include:

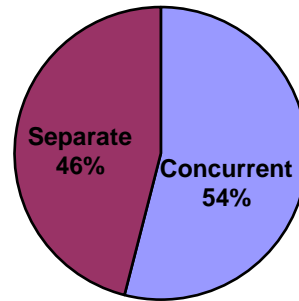
1. Growth and Population projections for the affected area.
2. Location and characteristics of any disadvantaged unincorporated communities
3. Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies
4. Financial ability of agencies to provide services
5. Status of, and opportunity for, shared facilities
6. Accountability for community service needs including governmental structure and operational efficiencies
7. Any other matter related to effective or efficient service delivery, as required by commission policy

Administrative and organizational information is collected and evaluated. This typically starts with a request letter or questionnaire to the agency. A variety of information is used in updating the Service Review and Sphere Update:

- Annual Budgets for 3 years
- Urban Water Mgt. Plan
- Rate Studies
- Financial Status Reports
- Capital Improvement Plans
- Water Resource Studies
- General Plan/Local Coastal Plan
- Sewer Master Plan

The preparation of a Municipal Service Review is an information driven activity. The assistance from City and District staff in gathering the information is necessary to prepare a comprehensive Sphere Update and MSR. LAFCO staff takes this information and reviews and analyzing the data. Generally, if you name it, staff will evaluate, summarize, and prepare a recommendation using the resource.

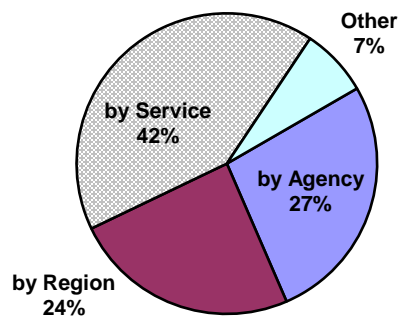
SOI-MSR Prepared Separate or Concurrent



Most LAFCO's (54%) are preparing MSRs concurrently with SOI updates. 46% are preparing MSR's separate from the SOI Update process. There is not a one size fits all way of doing MSRs.

The methods used are selected by the individual LAFCOs based on the particular situation or set of circumstances. This type of flexibility allows each LAFCO to easily implement the MSR requirement based on local conditions.

How are MSR's being prepared



Process. The process usually calls for several status reports and public hearings and provides for a number of points that the public may comment and provide testimony as the Sphere of Influence and Municipal Service Review update process unfolds. The process for bringing the SOI update and Municipal Service Review to the Commission includes the following steps:

Action Items
Compile and Gather Information
Prepare documentation: SOI Update-MSR-CEQA
Release for Public Review and Comment. 30-45-day comment period

Facilitate-City/County Memorandum of Agreement or Revise
Respond to Comments
Public Hearing regarding the Service Review/Sphere of Influence Update/City-County MOA

Services Addressed. The Municipal service reviews will cover the analysis of the service or services provided by all of the agencies within the designated geographic area subject to the service review. Target services include—but are not limited to—water, sewer, drainage, libraries, roads, parks, police, and fire protection. General government services such as courts, social services, human resources, treasury, tax collection, and administrative services will generally not be included in the service review. LAFCO determines which services will be included in each service review.

The service review provides LAFCO with a tool to comprehensively study existing and future public service conditions and to evaluate organizational options for accommodating growth, preventing urban sprawl, and ensuring that critical services are efficiently and cost-effectively provided.

Environmental Review. The Municipal Service Reviews are information documents and are generally exempt from environmental review. However, the establishment of Spheres of Influence would require an environmental determination that is appropriate under the California Environmental Quality Act (i.e., exemption, negative declaration, environmental impact report).

SBLAFCO Policies help establish the boundary of the sphere of influence for cities and special districts. Typically, these exclude parcels outside the Urban Boundary and/or Community Plans of a jurisdiction. Some of the following criteria are used when considering the establishment of the sphere of influence boundary:

- A. Existing uses or future development plans
- B. Size & development potential of parcels or need for services
- C. Topographical & physical considerations and constraints
- D. Jurisdiction’s willingness to serve

- E. Jurisdiction's ability to serve
- F. Planning principles
- G. Legal agreements
- H. City and County General Plans

LAFCO will determine when municipal service reviews are necessary. Generally, reviews will be prepared in conjunction with sphere of influence studies or updates; however, service reviews may be conducted prior to the sphere of influence process. Minor amendments to a sphere of influence, as determined by LAFCO, will not require a municipal service review.

The following written determinations are required by LAFCOs when establishing a sphere of influence for a jurisdiction according to section 56425(e) (1-5) of the Cortese-Knox-Hertzberg Act:

- Present and planned land uses in the area, including agriculture, and open space lands;
- Present and probable need for public facilities and services in the area;
- Present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide; and
- Existence of social or economic communities of interest in the area if the Commission determines that they are relevant to the agency.
- The present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

The municipal service review process does not require LAFCO to initiate changes of organization based on service review conclusions; it only requires that LAFCO make determinations regarding the provision of public services per the provisions of Government Code Section 56430. However, LAFCO, local agencies, and the public may subsequently use the determinations and related analysis to consider whether to pursue changes to service delivery, government organization, or spheres of influence.

CONCLUSION

The establishment of a sphere of influence has many components and criteria that should be considered before forming a boundary. Each jurisdiction is different and has varying goals and abilities to serve an area. The SOI/MSR/MOA Update process serves as a good starting point to identify issues and discuss solutions. MSRs and SOIs are essential for LAFCO to accomplish its public purposes under the CKH Act. The process allows LAFCO to act as a facilitator by going into the topics and using the information to build on as layers that guide the sphere of influence boundary decision. At the end of the day, the purpose is to implement LAFCO's stated legislative intent while also helping jurisdictions to achieve its goals.

Attachment

Attachment A - SBLAFCO Sphere of Influence Policies.

Attachment B - SBLAFCO Municipal Service Review Authority and Factors of Analysis.

Attachment C - OPR MSR Guideline 2003.

Please contact the LAFCO office if you have any questions.

Sincerely,



Mike Prater
Executive Officer

II. SPHERE OF INFLUENCE POLICIES

A sphere of influence establishes the probably ultimate physical boundaries and service area of each governmental agency within the county. Once adopted, these spheres of influence are to be used by the Commission as one factor in making decision on proposal over which it has jurisdiction and as a basis for recommendations on governmental reorganization. A proposal shall not be approved solely because the area falls within the sphere of influence of an agency.

Sphere of Influence determinations are to be reviewed periodically and changed or updated as circumstances may require in the opinion of LAFCO. Such periodic review should be made approximately every five years.

The Commission will generally apply the following policy guidelines in spheres of influence determinations while also taking into account local conditions and needs.

1. The plans and objectives contained within the adopted General Plans of the cities and the county will be supported. In cases where these plans are inconsistent, the Commission will adopt findings relative to its decision.
2. Community-centered urban development will be encouraged wherever justified on the basis of reduced cost of desired levels of community services, energy conservation, and preservation of agricultural and open space resources.
3. Duplication of authority to perform similar service functions in the same territory will be avoided.
4. Multiple-service agencies will be preferred to a number of limited services districts. In this regard, city provision of multiple services will be preferred where possible because of the substantially broader authority and responsibility to provide services and controls to their constituencies, including land-use planning controls.
5. Where possible, a single larger agency rather than a number of adjacent smaller ones, established for a given service in the same general area, will be preferred.
6. An economically sound base for financing services without including territories which will not benefit from the services will be promoted.
7. Sphere of influence lines shall seek to preserve community identity and boundaries and will urge the political and functional consolidation of local government agencies that cross-cut those affected communities.

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8. Sphere of influence lines may be larger or smaller than existing local agency boundaries and may lead to recommendations for changes of organization.
 9. Agencies which do not have major impact upon land, road, or capital facilities planning (such as cemetery districts) shall general have a sphere of influence which is coterminous with their existing jurisdictional boundaries.
 10. Agricultural resources and support facilities should be given special consideration in sphere of influence designations. High value agriculture areas, including areas of established crop production, with soils of high agricultural capability should be maintained in agriculture, and in general should not be included in an urban service sphere of influence.
 11. The Commission will consider area-wide needs for governmental services and evaluate individual districts serving the area as they relate to the total system of the existing local government in the community and alternative arrangements.

Environmental Review

A LAFCO sphere of influence determination is subject to review under the provision of the California Environmental Quality Act (CEQA). In order to enable environmental considerations to be effectively integrated into a sphere of influence determination, and environmental review will be conducted concurrently with the development of the sphere of influence determination.

Inasmuch as a sphere of influence determination represents the potential extension of the services of a local governmental agency, the environmental impacts associated with a sphere of influence are of a long-range nature. Thus the "Degree of Specificity" of the environmental review reflects the regional nature of a sphere decision. It is necessary of a general nature, focusing on the secondary, indirect impacts associates with the future extension of services within a sphere boundary.

The determination of whether or not an Environmental Impact Report (EIR) is necessary for a sphere of influence determination, i.e., the "Level of Significance" associated with a sphere determination, will necessarily vary according to the environmental resources affected by a sphere designation.

1. All environmental documents shall be prepared in accordance with the California Environmental Quality Act and implementing CEQA Guidelines, including applicable implementing guides of LAFCO, and the lead agency preparing the environmental document.

D. Spheres of Influence

A basic LAFCO responsibility is to prepare and adopt a sphere of influence for each city and special district. A sphere is defined by §56076 as a “plan for the probable physical boundaries and service area of a local agency, as determined by the commission.”

LAFCO’s regulatory decisions must be consistent with spheres of Influence which influence matters of urban form, the local government structure, public services and infrastructure and government finances

E. Municipal Service Reviews

Government Code Section 56430 requires LAFCO to study local governments and their services prior to, or in conjunction with, but not later than updating or establishing a sphere of influence.

These studies are called Municipal Service Reviews and LAFCO in adopting a MSR is required to make a number of specific written determinations

F. Initiation of Special District Reorganizations

LAFCO may initiate proposals for consolidations, dissolutions, mergers and the establishment of subsidiary districts, or a reorganization that includes any of these changes of organization, provided the proposal is consistent with a recommendation or conclusion of a study prepared by the Commission including an adopted sphere of influence.

G. Miscellaneous Other Powers

Other LAFCO powers and duties are to:

- Adopt standards and procedures for the evaluation of proposals and plans of reorganization.
- Make and enforce rules and regulations for the orderly and fair conduct of hearings.
- Appoint and assign staff personnel and employ or contract for professional or consulting services to carry out and give effect to the functions of the Commission.

H. Environmental Policies and Procedures

LAFCOs are public agencies subject to the California Environmental Quality Act (Public Resources Code 21000 et seq).

This statute contains environmental policies, requires environmental review and reporting procedures and provides opportunities for public participation in the decision-making process.

Municipal Service Review Determinations Factors of Analysis

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 requires LAFCOs to conduct reviews of municipal services and make six written determinations. The following factors to be considered provide examples of how Santa Barbara LAFCO will fulfill the determination requirement.

Determination 1: Growth and population projections for the affected area

Efficient provision of public services is linked to an agency's ability to plan for future need. For example, a water purveyor must be prepared to supply water for existing and future levels of demand, and also be able to determine where future demand will occur. Municipal service reviews will give LAFCO, affected agencies and the public the means to examine both the existing and future need for public services and will evaluate whether projections for future growth and population patterns are integrated into an agency's planning function.

Determination 2: Location and characteristics of any disadvantaged unincorporated communities

Senate Bill No. 244 (Wolk) requires the identification and description of all "disadvantaged unincorporated communities" located within or contiguous to the existing spheres of influence of cities and special districts that provide fire protection, sewer, and/or water services. Disadvantaged unincorporated communities are defined as inhabited unincorporated areas with an annual median household income that is 80% or less than the statewide annual median household income.

Determination 3: Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies

In authorizing the preparation of municipal service reviews, the State Legislature has focused on one of LAFCO's core missions—encouraging the efficient provision of public services. Evaluating the present and planned capacity of public facilities and adequacy of public services is a primary component of this mission. The evaluation will frequently yield information about the condition of infrastructure. Infrastructure needs or deficiencies, which refers to the adequacy of existing and planned public facilities in relation to how public services are—and will be—provided to citizens, impacts the efficient delivery of public services. Infrastructure can be evaluated in terms of capacity, condition, availability, quality, and correlations among operational, capital improvement, and finance plans. It is recognized that there may be unmet infrastructure needs due to budget constraints or other factors; however, identification of deficiencies may promote public understanding and support for needed improvements.

Determination 4: Financial ability of agencies to provide services.

LAFCO must weigh a community's public service needs against the resources available to fund the services. During the municipal service review, the financing constraints and opportunities, which have an impact on the delivery of services, will be identified and enable LAFCO, local agencies, and the public to assess whether agencies are capitalizing on financing opportunities. For example, a service review could reveal that two or more water agencies that are each deficient in storage capacity and, which individually lack financial resources to construct additional facilities, may benefit from creating a joint venture to finance and construct regional storage facilities. Service reviews may also disclose innovations for contending with financing constraints, which may be of considerable value to numerous agencies.

Determination 5: Opportunities for sharing facilities

Public service costs may be reduced and service efficiencies increased, if service providers develop strategies for sharing resources. Examples of resource sharing include the use of regional communication centers, wastewater treatment facilities and distribution lines, etc. Sharing facilities and excess system capacity decreases duplicative efforts, may lower costs, and minimize unnecessary resource consumption. The service review will inventory facilities within the study area to determine if facilities are currently being utilized to capacity and whether efficiencies can be achieved by accommodating the facility needs of adjacent agencies. Options for planning for future shared facilities and services will also be considered.

LAFCO's role in encouraging efficiently provided public services depends, in part, on helping local agencies explore cost avoidance opportunities. Cost avoidance opportunities may also include facility sharing arrangements, the use of joint powers agreements, or other innovative measures that can reduce costs and improve services. The municipal service review will evaluate the status of, and opportunities for, sharing facilities, with the goal of: (1) eliminating duplicative services; (2) reducing high administration to operation cost ratios; (3) replacing outdated or deteriorating infrastructure and equipment; (4) reducing inventories of underutilized equipment, building, or facilities; (5) redrawing overlapping or inefficient service boundaries; (6) replacing inefficient purchasing or budgeting practices; (7) implementing economies of scale; and (8) increasing profitable outsourcing, etc.

Determination 6: Accountability for community service needs, including government structure and operational efficiencies

In reviewing local accountability and governance, LAFCO will consider the degree to which an agency fosters local accountability, especially when assessing community service needs. *Local accountability* refers to public agency decision making and operational and management processes that: (1) include an accessible and accountable elected or appointed decision making body and agency staff; (2) encourage and value public participation; (3) disclose budgets, programs, and plans; (4) solicit public input when considering community service needs and infrastructure plans; and (5) evaluate outcomes of plans, programs, and operations and disclose results to the public.

Local accountability for determining community service needs may produce operational efficiencies. Efficiently managed agencies consistently implement plans to improve service delivery, reduce waste, eliminate duplications of effort, contain costs, maintain qualified employees, build and maintain adequate contingency reserves, and encourage and maintain open dialogues with the public and other public and private agencies. The service review will evaluate operational efficiency by analyzing agency functions, operations, and practices—as well as the agency’s ability to meet current and future service demands.

The Santa Barbara LAFCO may also examine operational efficiencies that could be gained through: (1) functional or structural reorganizations of existing agencies; (2) amendment or update of spheres-of-influence; (3) boundary changes, such as annexations or detachments from cities or special districts; (4) formation of new special districts; (5) special district dissolutions and consolidations; (6) mergers of special districts with cities; (7) establishment of subsidiary districts; or (8) any additional reorganization options found in Govt. Code § 56000 et. Seq.

Determination 7: Any other matter related to effective and efficient service delivery

The municipal service review is not limited to the six mandatory determinations contained in State Law. Accordingly, the service review may contain analysis of additional subject areas related to the effective and efficient delivery of services.



Gray Davis
GOVERNOR

STATE OF CALIFORNIA



Tal Finney
INTERIM DIRECTOR

LOCAL AGENCY FORMATION COMMISSION MUNICIPAL SERVICE REVIEW GUIDELINES

Governor's Office of Planning and Research

AUGUST 2003

FINAL

2. GROWTH AND POPULATION PROJECTIONS FOR THE AFFECTED AREA

In identifying an agency's growth and population projections, LAFCO may wish to address the following factors in its review:

	FACTOR / ISSUE
1.	Projected growth and demographic changes in and around the agency's service areas.
2.	Historic and expected land use absorption trends.
3.	Estimate of future service needs.
4.	Impact of land use plans and growth patterns on service demands.
5.	Impact of service plans and policies on growth and/or land use patterns for adjacent areas, on mutual or regional social and economic interests, and on the local governmental structure of the county.
6.	Relationship between an agency's boundary and SOI with the projected growth in the study area.
7.	Compatibility of service plan(s) with other local agency land use/development plans.
8.	Projected household size of new and existing residential dwellings.
9.	Compatibility between agency service plans, regional growth projections and efficient urban development.

3. FINANCING CONSTRAINTS AND OPPORTUNITIES

In identifying an agency's financing constraints and opportunities, LAFCO may wish to address the following factors in its review:

	FACTOR / ISSUE
1.	Implementation of appropriate financing/funding practices.
2.	Potential for shared financing and/or joint funding applications.
3.	Combination of enterprise and/or non-enterprise financing functions.
4.	Comparative analysis of financing rates among other agencies in study area.
5.	Bond rating(s).
6.	Ability to obtain financing.
7.	Existing and/or proposed assessment district(s).
8.	Debt-to-services ratio by area and subarea incomes.
9.	Opportunities for additional revenue streams, including joint agency grant applications, untapped resources, or alternative government structures.
10.	Methods to pay down existing debt(s), including using excess revenues.

	FACTOR / ISSUE
6.	Rate comparison between sub-regions based on demographic information.
7.	The services that ratepayers and/or assessed properties are receiving for which they are paying.
8.	Financial impacts on existing customers caused by the funding of infrastructure needed to support new development.
9.	Impacts of standby rates (charges assessed to under-or-undeveloped land used for rural, agricultural or open space uses) on open space and affordable housing plans.
10.	Relationship between rate and service polices and the provision of decent and affordable housing.
11.	Availability of reasonable emergency reserves.
12.	Use of annual savings.

6. OPPORTUNITIES FOR SHARED FACILITIES

In identifying an agency's opportunities for shared facilities, LAFCO may wish to address the following factors in its review:

	FACTOR / ISSUE
1.	Current shared activities with other service providers, including shared facilities and staff.
2.	Suggested existing and/or future shared facility opportunities by the agency.
3.	Opportunities for conjunctive and/or joint use projects, such as groundwater storage/parks, schools/parks, or flood detention/parks.
4.	Duplication of existing and/or planned facilities of other service providers.
5.	Availability of excess capacity to serve customers of other agencies.

7. GOVERNMENT STRUCTURE OPTIONS

In identifying an agency's government structure options, LAFCO may wish to address the following factors in its review:

	FACTOR / ISSUE
1.	Available government options to provide more logical service boundaries to the benefit of customers and regional planning goals and objectives.
2.	Recommendations by a service provider and/or an interested party for government options.
3.	Anticipated proposals to LAFCO that will affect the service provider.
4.	Prior proposals or attempts by the agency to consolidate and/or reorganize.
5.	Availability of government options that improve public participation, local accountability, and governance.
6.	Impacts of government structures on the potential for displacement of current residents.

**Governor's Office of Planning and Research
LAFCO Municipal Service Review Guidelines**

	FACTOR / ISSUE
26.	Identification of illogical boundaries and their effect on rates.
27.	Impact of government structure options on an agency's financial stability.
28.	Rationale for an agency's emergency and/or undesignated reserves (fund equity or balance), particularly in relation to their gross annual revenue.
29.	Changes and/or modifications in boundaries in order to promote planned, orderly, and efficient patterns of urban development.
30.	Changes and/or modifications in boundaries in order to avoid premature inducement, facilitation, or conversion of existing open space lands, including: the direction of growth away from prime agricultural and important open space lands towards infill areas or areas containing nonprime agricultural land; the development of vacant land adjacent to existing urban areas and within existing spheres of influence.
31.	Boundary adjustments in order to minimize the amount of land needed to accommodate growth in the next 5-10 years within the spheres of influence of special districts and cities.
32.	Prevention of extensions of urban services to important agriculture and open space areas not planned for growth or within the boundaries of the city or special district.
33.	Impact of a change in government structure on the implementation of regional transportation, water quality, air quality, fair share housing allocation, environmental justice, airport land use, open space, agricultural, and other environmental polices or programs.
34.	Impacts of government structures on fair housing programs.
35.	Available government options that improve the ability to provide and explain budget and financial data.
36.	Opportunities for improvement in the quality and/or levels of service through changes in government structure.
37.	Impact of investment policies on service levels and quality.
38.	Evaluation of bond rates, ability to borrow or obtain grants, budget practices and other aid.
39.	Ability to gain environmental benefits (wetland restoration, water conservation, and other conservation policies) through government structure options.
40.	Opportunities to integrate services without excessive cost.
41.	Cost-benefit analysis of potential changes in government structure through merging staff, staff reduction by attrition, phasing out of elected or appointed positions, and management staff.
42.	Opportunities for improved service delivery and/or an increase in system standards by system integration through changes in government structure.
43.	Identify prohibitions in the affected Principal Acts that would affect government structure options, including pending litigation, court judgments, other legal issues, restricted assets, financial or other constraints.
44.	Integration of debts and obligations analyses.
45.	Potential successor agencies.

	FACTOR / ISSUE
19.	Review of environmental and safety compliance measures.
20.	Current litigation and/or grand jury inquiry involving the service under LAFCO review.

9. LOCAL ACCOUNTABILITY AND GOVERNANCE

In evaluating an agency's local accountability and governance structure, LAFCO may wish to address the following factors in its review:

	FACTOR / ISSUE
1.	Compliance with state disclosure laws and the Brown Act.
2.	Level of public participation (i.e. open meetings, accessible staff and elected officials, an accessible office open to the public, a phone and/or message center, a web site, customer complaint and suggestion opportunities).
3.	Agency representatives (i.e., board members, employees, and staff).
4.	Public outreach efforts (i.e. newsletters, bill inserts, TV, web site).
5.	Media involvement (i.e. meetings publicized, evening board meetings, evening or weekend public planning sessions).
6.	Accessibility of meetings (i.e. meetings publicized, evening board meetings, evening or weekend public planning sessions and translations for non-English speakers and the hearing impaired).
7.	Election process.
8.	Participation of service users in elections (i.e. elections publicized, day and evening voting).
9.	Public access to adopted budgets.
10.	Budget reports' compatibility with state law.
11.	Audits.
12.	Access to program progress reports.
13.	Current provision of service(s).