

Date of Hearing: April 24, 2019

ASSEMBLY COMMITTEE ON LOCAL GOVERNMENT
Cecilia Aguiar-Curry, Chair
AB 600 (Chu) – As Amended April 11, 2019

SUBJECT: Local government: organization: disadvantaged unincorporated communities.

SUMMARY: Requires local agencies to plan for water service in disadvantaged unincorporated communities (DUCs). Specifically, **this bill:**

- 1) Defines “qualified special district” to mean a special district that contains more than 500 service connections and that provides drinking water or wastewater services.
- 2) Requires, on or before January 1, 2021, each city, county, and qualified special district to develop an accessibility plan to secure safe drinking water, wastewater services, storm water drainage, and structural fire protection in specified communities identified in the land use element of a city or county’s general plan.
- 3) Specifies that each city, county, and qualified special district shall consult with the local agency formation commission (LAFCO); the State Water Resources Control Board (SWRCB); county environmental health departments; and, any relevant cities, special districts, mutual water companies, and investor-owned utilities, in developing an accessibility plan.
- 4) Requires the LAFCO to determine which entity is best positioned to provide adequate water or wastewater services to the affected territory.
- 5) Provides that the accessibility plan shall include a timeline with intermediary steps to secure necessary infrastructure and services within five years.
- 6) Requires the accessibility plan to include the following:
 - a) Any actions and alternatives necessary to be taken by the LAFCO, if any, to enable the entity that is best positioned to provide services to the affected territory;
 - b) Any actions to be taken by any local agency that the LAFCO believes are necessary to establish services to the DUC;
 - c) An analysis of costs and benefits of improved water or wastewater services for residents in each affected territory; and,
 - d) An analysis of local, state, and federal funding sources available to implement the accessibility plan.
- 7) Specifies that the city, county, or qualified special district shall submit the accessibility plan to the LAFCO.
- 8) Requires, that on or before February 1, 2022, each city, county, and qualified special district to provide an annual progress report with respect to its accessibility plan at a noticed public hearing.

- 9) Provides that the city, county, or relevant special district shall post the annual progress report on its internet website.
- 10) Specifies that costs and fees for services provided to the affected territory through implementation of the accessibility plan shall not exceed the cost of providing service.
- 11) Provides that fees and conditions related to service provision to the affected territory through implementation of the accessibility plan shall be consistent with fees and conditions placed on other new customers or service recipients.
- 12) Requires, on or before January 1, 2021, each county to submit a map of the county that identifies DUCs that lack safe drinking water or adequate wastewater, along with the adopted accessibility plan prepared in electronic format with the Office of Planning and Research (OPR), the SWRCB, and any relevant regional water quality control board. Requires OPR, the SWRCB, and the city or county to each post the map on its respective internet website.
- 13) Requires, on or before the next adoption of the housing element, each city or county to consider the impacts of climate change on water, wastewater, storm water drainage, and structural fire protection service needs or deficiencies.
- 14) Prohibits a LAFCO from adopting, amending, or updating a sphere of influence that does either of the following:
 - a) Removes a disadvantaged community from the sphere of influence of a city or special district, unless the LAFCO makes a finding, based upon written evidence, that the removal of the disadvantaged community from the sphere of influence of the city or special district will result in improved service delivery to the community; or,
 - b) Fails to include a disadvantaged community that is contiguous to the proposed sphere of influence, unless the commission makes a finding, based upon written evidence, that the exclusion of the disadvantaged community from the proposed sphere of influence will result in improved access to safe drinking water or wastewater services.
- 15) Specifies that a LAFCO shall not amend or update a sphere of influence for a city or special district that has not taken action on the accessibility plan.
- 16) Requires a LAFCO, within five years of the approval or approval with conditions of an accessibility plan, to hold a noticed public hearing and review the status of every DUC that is subject to the accessibility plan. Specifies that if the LAFCO determines that service needs remain unaddressed, the LAFCO shall initiate a change of organization, reorganization, or service extension.
- 17) Specifies that a LAFCO shall not approve an annexation to a qualified special district, in addition to cities, of any territory greater than 10 acres, or as determined by LAFCO policy, where there exists a DUC that is contiguous to the area of proposed annexation, unless an application to annex the DUC to the qualified special district has been filed with the executive officer of the LAFCO.
- 18) Provides that an application to annex a contiguous disadvantaged community shall not be required if the following apply:

- a) The LAFCO finds, based upon written evidence, that a majority of the residents, instead of registered voters, within the affected territory are opposed to annexation; or,
 - b) The commission finds, based upon written evidence, that a majority of residents within the DUC would prefer to address service deficiencies through an extraterritorial service extension.
- 19) Specifies that the requirement in 17) above shall apply to the annexation of two or more contiguous areas that take place within five years of each other and that are individually less than 10 acres but cumulatively more than 10 acres.
- 20) Provides, unless otherwise specified, that a LAFCO shall not approve an annexation to a city or to a qualified special district of any territory if the city or applicable county has failed to take steps necessary to implement an accessibility plan.
- 21) Adds to the purposes of LAFCOs the encouragement of the equitable provision of government services.

EXISTING LAW:

- 1) Vests the SWRCB with all of the authority, duties, powers, purposes, functions, responsibilities, and jurisdiction of the State Department of Public Health and its predecessor to enforce the State Drinking Water Act (SDWA).
- 2) Defines a "public water system" as a system for the provision of water for human consumption through pipes or other constructed conveyances that has 15 or more service connections or regularly serves at least 25 individuals daily at least 60 days out of the year.
- 3) Requires the SWRCB, in administering SDWA programs to fund improvements and expansions of small community water systems, to encourage the consolidation of small community water systems that serve disadvantaged communities, and prioritize funding for construction projects that involve the physical restructuring of two or more community water systems, at least one of which is a small community water system that serves a disadvantaged community, into a single, consolidated system.
- 4) Authorizes the SWRCB, where a public water system or a state small water system within a disadvantaged community, consistently fails to provide an adequate supply of safe drinking water, to order consolidation with a receiving water system. Provides that the consolidation may be physical or operational.
- 5) Limits the liability of a consolidated water system, wholesaler, or any other agency in the chain of distribution that delivers water to a consolidated water system, as specified.
- 6) Declares to be the established policy of the state that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitary purposes.
- 7) Enacts the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH Act), which:

- a) Controls how local officials change the boundaries of cities and special districts, putting LAFCOs in charge of the proceedings; and,
- b) Directs LAFCOs to ensure that services are effectively and efficiently delivered, and local governments can only exercise their powers and provide services where allowed to by LAFCO, including the formation of new cities and special districts, modifications of existing boundaries, and dissolutions of unsustainable special districts.

FISCAL EFFECT: This bill is keyed fiscal and contains a state mandated local program.

COMMENTS:

- 1) **LAFCOs.** The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000, creates a local agency formation commission (LAFCO) in each county to control the boundaries of cities, county service areas, and most special districts. The courts repeatedly refer to LAFCOs as the Legislature’s watchdog over boundary changes. To plan for the future boundaries and service areas of the cities and special districts, a LAFCO must adopt a policy document for each city and district called a sphere of influence. The LAFCOs’ boundary decisions must be consistent with the spheres of influence of the affected cities or districts. Spheres must be updated as necessary.

In order to determine spheres of influence, LAFCOs must periodically conduct a “municipal service review” (MSR) to inform their decisions about spheres of influence. MSRs must analyze and make determinations about seven topics:

- a) Growth and population projections;
 - b) Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies, including the water, sewer, and fire protection needs of disadvantaged unincorporated communities;
 - c) Agencies’ financial abilities to provide services;
 - d) Opportunities for sharing facilities;
 - e) Accountability for community service needs;
 - f) The location and characteristics of any disadvantaged unincorporated communities; and,
 - g) Other matters relating to effective or efficient services.
- 2) **California’s Drinking Water Program.** Senate Bill 861 (Committee on Budget and Fiscal Review), Chapter 35, Statutes of 2014, transferred the Drinking Water Program from the Department of Public Health (DPH) to the SWRCB effective July 1, 2014, creating the new Division of Drinking Water within the SWRCB, and made other statutory changes to create efficiencies and adoption and administration of the Drinking Water Program.

The SWRCB directly enforces the SDWA for all large water systems (those with 200 or more service connections). For small water systems (those with less than 200 connections),

local health departments can be delegated to have regulatory authority as the local primacy agency.

3) **Human Right to Water.** In 2012, California became the first state to enact a Human Right to Water law [AB 685 (Eng), Chapter 524, Statutes of 2012]. Public policy continues to be focused on the right of every human being to have safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation. Water supply, contaminants, costs of treatment and distribution systems, the number and nature of small public water systems, especially in disadvantaged communities, and many other factors will continue to challenge progress in addressing the Human Right to Water.

4) **Drinking Water Contamination in Disadvantaged Communities.** The February 2018, University of California (UC) Davis report, "*The Struggle for Water Justice in California's San Joaquin Valley: A Focus on Disadvantaged Unincorporated Communities*," summarizes drinking water issues facing disadvantaged communities in California as follows:

"In California, lack of access to clean, safe, and affordable water is a threat to public health and well-being, and violates the state's newly codified Human Right to Water. In low-income communities located outside city boundaries (known as DUCs), drinking water is often unsafe to drink. In many such localities, drinking water is contaminated by industrial by-products (usually associated with agriculture, oil and gas production, transportation, and manufacturing) and compromised by inadequate wastewater treatment and disposal systems, as well as naturally occurring toxic substances like arsenic and uranium. Many DUC residents in the San Joaquin Valley pay a triple penalty to obtain safe water: they bear the health costs of unsafe drinking water; they purchase that unsafe water at high costs; and, they must also purchase 'substitute' water – typically expensive bottled water – for drinking and cooking.

"Lack of access to clean, safe and affordable drinking water has a racial and ethnic component: the vast majority of DUC residents are people of color who also face cumulative impacts from environmental contamination brought on by proximity to air pollution, pesticides, toxic facilities and waste disposal. Without city governments to directly represent their interests and provide essential services, residents of DUCs have been systematically deprived of access to important means of democratic governance."

While the 2018 UC Davis report focuses on DUCs in the San Joaquin Valley, the findings are consistent with a more expansive 2013 SWRCB report and 2012 UC Davis report that found that drinking water contamination in California disproportionately affects small, rural, and low-income communities that depend mostly on groundwater as their drinking water source. The 2013 SWRCB report found that 682 community public water systems in California, which serve nearly 21 million people, rely on contaminated groundwater as a primary source of drinking water. It also found that 265 community public water systems, which serve a little more than two million people, had received at least one drinking water quality violation within the last compliance cycle. The report points out that an additional two million Californians rely on groundwater from a private domestic well or a smaller groundwater-reliant system that is not regulated by the state. The SWRCB reports that currently approximately 330 drinking water systems are not in compliance with drinking water standards.

The 2018 UC Davis report also found that a significant number of DUC residents live close to an existing, and water quality compliant, community water system that could provide them with clean drinking water.

- 5) **Addressing Service Deficiencies.** LAFCOs, along with the planning agencies of cities and counties, are supposed to ensure that services are effectively and efficiently delivered to all communities throughout the state. Nevertheless, some communities continue to lack adequate public services, including safe drinking water and functioning wastewater systems, often due to their low income status. In some cases, these disadvantaged communities are contained within a city but lack adequate water and wastewater services. In other cases, these communities are located in unincorporated areas. These DUCs can be remote and far from other communities with better public services, but at other times they are adjacent to a city, special district, or county service area that provides water or wastewater services.

In recent years, the Legislature has taken several steps to try to address some of the service problems experienced by DUCs. SB 244 (Wolk), Chapter 513, Statutes of 2011, aimed to prevent cities from carving out DUCs by generally prohibiting annexations of small areas to a city if a DUC is contiguous with that area. SB 244 also required LAFCOs to include in the municipal service review (MSR) a description of the location and characteristics of any DUCs within or contiguous to the sphere of influence and to consider the water, sewer, or fire protection needs of DUCs within the sphere when considering updates. Finally, SB 244 required cities and counties to review the water and fire service needs of DUCs in their general plans. SB 244 made it easier for LAFCOs to identify boundary changes and governmental reorganizations necessary to fix water and sewer service problems faced by disadvantaged communities.

- 6) **Consolidations.** Subsequent legislation, SB 88 (Committee on Budget and Fiscal Review), Chapter 27, Statutes of 2015, took this effort a step further by authorizing SWRCB to order a consolidation of neighboring drinking water systems where it is economically feasible in order to address public health threats. SB 88 established an elaborate process for consolidating water systems that requires multiple public hearings, as well as consultations with affected entities, such as the water system being subsumed, the receiving water system, domestic well owners, and the local government with land use authority over the area, and the LAFCO.

Before ordering consolidation or extension of service, SWRCB must also encourage voluntary consolidations or extension of service, consider other enforcement remedies, obtain written consent from any domestic well owner, and provide technical assistance to both systems. The SWRCB must also make a series of findings, including that:

- a) Consolidation or extension of service is the most effective and cost-effective means to provide an adequate supply of safe drinking water; and,
- b) The capacity of the proposed interconnection needed to accomplish the consolidation is limited to serving the current customers of the subsumed water system.

Under SB 88, SWRCB must pay the full cost of the new capacity, including replacing any capacity lost as a result of the consolidation or extension of service, providing additional capacity needed as a result of the consolidation or extension of service, and legal fees. The

SWRCB must also pay the LAFCO's costs and fees, adequately compensate the owners of any privately owned subsumed water system, and coordinate with the appropriate LAFCO and other relevant local agencies to facilitate the change of organization or reorganization. SB 88 also prohibited the consolidated water system from increasing charges on existing customers of the receiving water system solely as a consequence of the consolidation or extension of service, unless the customers receive a corresponding benefit. Cleanup legislation the next year added a few additional requirements to the SB 88 process, including prohibiting fees or charges on a customer of a subsumed water system from exceeding the cost of consolidating the water system with a receiving system or the extension of service to the area [SB 552 (Wolk), Chapter 773, Statutes of 2016].

- 7) **How Does Consolidation of a Public Water System Work?** Consolidating public water systems and extending service from existing public water systems to communities and areas, which currently rely on under-performing or failing small water systems, as well as private wells, reduces costs and improves reliability. Consolidating or extending service from a public water system to a community otherwise served by unreliable systems or unregulated private wells advances the goal of a reliable, accessible supply of safe drinking water for all California residents.

Public water systems experiencing chronic water quality failures or unreliable supplies are first provided technical assistance to analyze the problem and recommend a course of action. Enforcement may also be necessary to achieve compliance with SDWA requirements. Lacking progress, the SWRCB may initiate discussions with the system and neighboring/adjacent public water systems regarding consolidation. Consolidation may involve the actual physical consolidation of the participating water systems (physical consolidation), just the management of the participating water system (managerial consolidation), or both. If voluntary consolidation cannot be negotiated in a reasonable time period, the SWRCB may commence proceedings for direct mandatory consolidation or a mandatory extension of service. In this case, consolidation letters will be sent to the consistently failing water system (subsumed system) and to the receiving system notifying them that they have six months to develop a plan for voluntarily consolidation. If the two systems have not developed a plan for consolidation within six months of the letters being issued, the SWRCB may then order the two systems to consolidate.

The SWRCB will provide funding, as necessary, and appropriate from the Water Quality, Supply, and Infrastructure Improvement Act of 2014 (Proposition 1, 2014), the Drinking Water State Revolving Fund (DWSRF), and monies made available from the emergency drought relief package, for consolidation or extension of service, including infrastructure improvements. SB 88 added a provision to the law limiting the liability of water systems, wholesalers, or any other agencies that deliver water to consolidated water systems. This liability relief is available regardless of whether the consolidation occurs through the mandatory consolidation process or through a voluntary act. These new liability relief provisions protect water systems involved in consolidations and remove a barrier that previously limited voluntary consolidations.

- 8) **Progress on Providing Clean Drinking Water.** The State SWRCB currently posts information on its website about ordered consolidations. It also tracks and has information on voluntary consolidations. Under the SWRCB's authority, there have been three mandatory consolidations ordered, and there have been more than 100 voluntary

consolidations in that time period. Within those, the SWRCB has had varying levels of participation. Some were consolidations the SWRCB helped to fund, some to which the SWRCB provided guidance, and others for which the SWRCB just issued a permit.

- 9) **Other Related and Prior Legislation.** SB 778 (Hertzberg) from 2017 would have required the SWRCB to report on public water system consolidations to date, and their success or failure. This bill was held in the Assembly Appropriations Committee.

SB 1215 (Hertzberg), Chapter 982, Statutes of 2018, authorizes the SWRCB to order the provision of sewer service by a special district, city, or county to a disadvantaged community, as defined, under specified circumstances, and requires the SWRCB to take certain actions before ordering the provision of sewer service that are similar to those required for the consolidation or extension of water systems.

AB 2501 (Chu), Chapter 871, Statutes of 2018, authorizes the SWRCB to order consolidation with a receiving water system when a disadvantaged community is reliant on a domestic well that consistently fails to provide an adequate supply of safe drinking water; prohibits, for an ordered consolidation, the receiving water system from charging specified fees or imposing specified conditions on customers of the subsumed water system that it would not otherwise charge or impose; and, makes other changes to ordered consolidation law.

- 10) **Bill Summary.** This bill requires each city, county, and qualified special district to develop an accessibility plan to secure safe drinking water, wastewater services, storm water drainage, and structural fire protection in DUCs identified in a city's or county's land use element. This bill specifies the information that must be included in the accessibility plan, requires the LAFCO to approve the plan within 90 days of the plan being submitted, and mandates each city, county, or special district to provide annual progress reports during a public hearing. This bill provides that each county shall submit a map of the county, identifying the DUCs that lack safe drinking water or adequate wastewater. This bill requires the LAFCO, within five years of the approval of an accessibility plan, to review the status of every DUC in a public hearing, and specifies that the LAFCO shall initiate a change of organization if it is determined that the service needs remain unaddressed. This bill limits the ability of LAFCOs to amend, adopt, or update a sphere of influence and the circumstances under which the LAFCO can approve an annexation to a city or special district. Lastly, this bill requires a city or county land use element to consider the impacts of climate change on specified services. The Leadership Counsel for Justice and Accountability is the sponsor of this bill.
- 11) **Author's Statement.** According to the author, "In 2012, California became the first state in the country to recognize the Human Right to Water. However, in reality, many communities throughout the state still lack access to safe and clean drinking water. We need to take action to address this issue in order to provide equitable access to clean drinking water. AB 600 focuses on vulnerable communities that are often left behind even when there are opportunities for extension of water and wastewater services."

- 12) **Policy Considerations.** The Committee may wish to consider the following:

- a) **Accessibility Plans.** Existing law requires LAFCOs to include in the MSR a description of the location and characteristics of any DUCs within or contiguous to the sphere of

influence and to consider the water, sewer, or fire protection needs of DUCs within the sphere when considering updates. Additionally, cities and counties are required to review the water and fire service needs of DUCs in their general plans. In Section 6 of this bill, cities, counties, and qualified special districts are required to create separate accessibility plans that contain very similar information. The Committee may wish to consider if requiring an entirely new plan is necessary or if amending the existing requirements is a more reasonable approach.

This bill could also lead to multiple local entities creating separate accessibility plans that consider the same DUC, potentially conflicting with each other. Additionally, agencies would be required to plan for services that they do not even provide. For instance, not all cities provide drinking water to its residents. Is it appropriate for a city that does not provide drinking water to plan for necessary steps to ensure a nearby DUC has adequate service? The Committee may wish to consider if an entity's accessibility plan should have a direct nexus to the services provided by that entity.

- b) **Planning and Development.** A viable development needs certain services, including drinking water and wastewater, but a local government can only provide those services where LAFCO agrees. By restricting the ability of LAFCO to approve certain service extensions or sphere of influence updates, AB 600 further conditions new development on the provision of services to other unrelated communities. This is regardless of whether there is any causal link or nexus between a proposed sphere change or extension of services and the DUC that lacks drinking water or wastewater. The Committee may wish to consider if this bill could make it more difficult for future development.
- c) **Why Not LAFCO?** LAFCOs are charged with reviewing and approving most changes to local services and must consider DUCs when conducting MSRs and sphere of influence updates. It is unclear why this bill instead mandates cities, counties, and special districts to create the accessibility plans. The Committee may wish to consider which local entity is best equipped to review and create recommendations regarding the services provided in each DUC.
- d) **Burden on LAFCOs.** Traditionally, the agency that initiates dissolution, consolidation, annexation, or other change of organization pays for the costs associated with completing the process. LAFCOs are funded by the cities, counties, and, in 30 counties, special districts. As of 2018, one third of the 58 LAFCOs had an annual budget of less than \$100,000 and one-fifth had an annual budget of less than \$50,000. This bill imposes a number of burdens on LAFCOs that they may not have the resources to pursue, including initiating changes of organizations based on the accessibility plans in Section 4. Conducting annexation procedures can be expensive, especially if it requires an election.

Additionally, because more than one plan may account for the same DUC, LAFCOs will likely be required to use resources to reconcile the different plans so they do not conflict with one another. The Committee may wish to consider if LAFCOs will be able to perform these duties when they often have severe budget constraints.

- e) **SB 88.** The SWRCB was given the authority to order the consolidation of failing water systems in 2015. The SWRCB must conduct a thorough process to determine whether physical or managerial consolidation is needed and provides the funding for any mandated consolidation or extension of service. The Committee may wish to consider

if the current SB 88 consolidation authority is insufficient or if an additional, locally driven, process is needed.

- f) **Climate Change.** Section 7 of this bill requires a city or a county to consider the impacts of climate change in the land use element of its general plan. Existing law already requires climate change to be addressed in the safety element of a general plan. The Committee may wish to consider if this additional requirement is necessary.

13) **Committee Amendments.** In response to the above policy considerations and other concerns, the Committee may wish to amend the bill by removing all of the requirements pertaining to the accessibility plans, the mandate that LAFCOs initiate changes of organizations, the changes to LAFCOs' purposes, the mapping requirements, the provisions pertaining to spheres of influence, the requirements added to the land use element of city and county general plans, the annexation provisions related to qualified special districts, and other conforming changes. These amendments would:

- a) Delete Sections 1, 2, 4, 5, 6, and 7 of the bill;
- b) Delete paragraph (a)(2)(F) from Section 3 of the bill;
- c) Remove the addition of "qualified special districts" from (a)(8)(A) of section 3 of the bill;
- d) Replace the word "residents" with "registered voters" in paragraphs (a)(8)(B)(ii) and (a)(8)(B)(iii) of Section 3 of the bill; and,
- e) Delete paragraph (a)(9) from Section 3 of the bill.

14) **Arguments in Support.** The sponsors argue, "In 2011, SB 244 (Wolk) began the work to address this problem. It required cities and counties to identify DUCs in their general plans, and update the elements of the plan to include this analysis. It also required Local Agency Formation Commissions (LAFCOs) to assess the infrastructure needs of DUCs in municipal services reviews and annexation decisions. SB 244 was an important first step. Now, it is time for step two.

"AB 600 (Chu) will ensure that local entities provide basic services to communities that have been long neglected by state and local governments. The bill proposes that cities, special districts, and counties develop accessibility plans in collaboration with LAFCOs that will outline actionable steps to address the deficiencies and lack of services that were identified in SB 244 analyses.

"As a critical follow up to SB 244, AB 600 confronts decades of under-investment in DUCs' drinking water and wastewater systems. This bill carries forward the important work of achieving adequate, equitable services for all California residents."

15) **Arguments in Opposition.** Opponents argue that this bill is duplicative of existing law as LAFCOs already have to consider DUCs in MSRs, and cities and counties must update the land use elements in their general plans with similar information. Additionally, the opponents are concerned regarding the unfunded mandates that this bill could impose, the potential negative effect on housing development during the current housing crisis, confusion

with existing requirements for charging certain costs and fees, and the inclusion of unclear and overly broad terms. Lastly, LAFCOs are concerned that this bill removes their discretion to approve or deny changes of organization based upon unique local circumstances and conditions.

REGISTERED SUPPORT / OPPOSITION:

Support

Leadership Counsel for Justice and Accountability [SPONSOR]
Alliance of Californians for Community Empowerment
Asian Pacific Environmental Network
California Coastkeeper Alliance
California Environmental Justice Alliance
California Institute for Rural Studies
Camille Panni from Aoki Water Justice Clinic, UC David School of Law
Center for Community Action and Environmental Justice
Center for Race, Poverty, & the Environment
Center for Sustainable Neighborhoods
Central California Environmental Justice Network
Clean Water Action
Community Water Center
Courage Campaign
Lutheran Office of Public Policy-California
Planning and Conservation League
Policy Link
Pueblo Unido CDC
Roman Catholic Diocese of Fresno
Western Center on Law and Poverty

Opposition

California Association of LAFCOs
California Building Industry Association (unless amended)
California Municipal Utilities Association
California Special Districts Association
Contra Costa LAFCO
Humboldt LAFCO
Marin LAFCO
Nevada LAFCO
Placer LAFCO

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