



San Diego County
Local Agency Formation Commission
 Regional Service Planning | Subdivision of the State of California

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AGENDA REPORT
 Consent | Action

November 7, 2022

TO: Commissioners

FROM: Keene Simonds, Executive Officer
 Carolanne Ieromnimon, Analyst I

SUBJECT: **Proposed “Toidi-Jonel Way Change of Organization” |
 Annexation to San Diego County Sanitation District (CO22-15)**

SUMMARY

The San Diego County Local Agency Formation Commission (LAFCO) will consider a change of organization initiated by a landowner to annex approximately 2.5 acres of unincorporated territory to the San Diego County Sanitation District (SD). The affected territory as submitted comprises one entire parcel developed with a single-family residence in the unincorporated community of Bonita. The affected territory is outside County SD’s sphere of influence but within a LAFCO authorized service area that allows for annexations paired with the ultimate expectation of a later reorganization into the City of Chula Vista. The proposal purpose is to extend public wastewater service to the subject parcel and in doing so accommodate the planned construction of an accessory dwelling unit. Staff recommends conditional approval of the proposal as submitted along with waiving protest proceedings.

BACKGROUND

Applicant Request

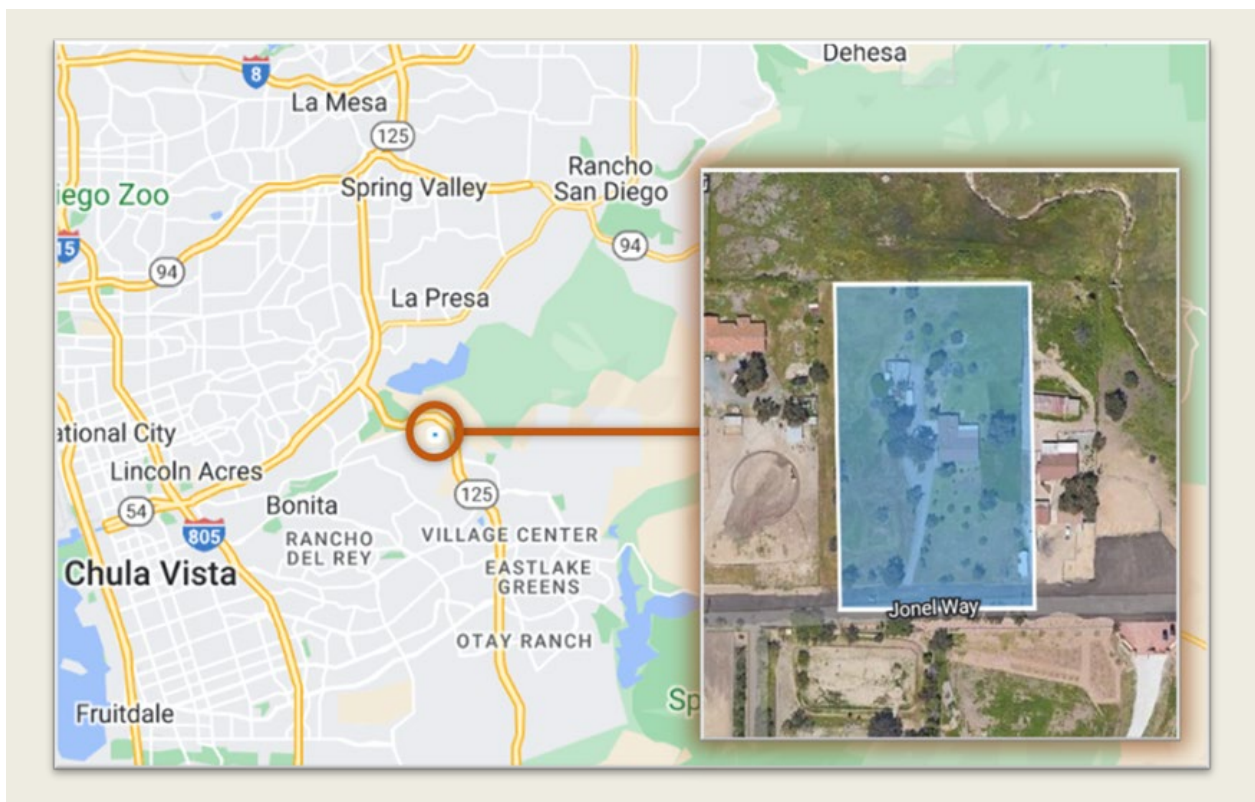
San Diego LAFCO has received a change of organization proposal initiated by an interested landowner – Toidi LLC (Jesus Santoyo) – requesting approval to annex 2.5 acres of unincorporated territory in Bonita to County SD. The affected territory as submitted comprises

<p>Administration Keene Simonds, Executive Officer 2550 Fifth Avenue, Suite 725 San Diego, California 92103-6624 T 619.321.3380 F 619.404.6508 www.sdlafco.org lafco@sdcountry.ca.gov</p>	<p>Chair Jim Desmond County of San Diego</p> <p>Joel Anderson County of San Diego</p> <p>Nora Vargas, Alt. County of San Diego</p>	<p>Vice Chair Paul McNamara City of Escondido</p> <p>Mary Casillas Salas City of Chula Vista</p> <p>Kristi Becker, Alt. City of Solana Beach</p>	<p>Chris Cate City of San Diego</p> <p>Marni von Wilpert, Alt. City of San Diego</p>	<p>Jo MacKenzie Vista Irrigation</p> <p>Barry Willis Alpine Fire Protection</p> <p>David A. Drake, Alt. Rincon del Diablo</p>	<p>Andy Vanderlaan General Public</p> <p>Harry Mathis, Alt. General Public</p>
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one entire legal parcel developed with a 1,547 square foot single-family residence at 6638 Jonel Way. The residence was built in 1964 and presently served by an onsite septic system. (Water service is provided by Otay Water District.) The County of San Diego Assessor’s Office identifies the subject parcel as 585-113-05.

Regional Setting

The affected territory lies in southern San Diego County within the unincorporated community of Bonita, west of State Highway 125 and south of State Highway 54. Principal access to the affected territory is provided by Proctor Valley Road via Jonel Way. Most of the surrounding area is under rural residential use with some light industrial activities. The affected territory lies within County Supervisorial District No. 1 (Nora Vargas), Assembly District No. 79 (Akilah Weber), and Senate District No. 40 (Ben Hueso). An aerial map of the affected territory and its regional setting follows. Attachment One shows the affected territory relative to the proposed boundary change involving County SD.



Subject Agencies

The proposed change of organization filed with San Diego LAFCO involves one subject agency: County SD.¹ A summary of the subject agency in terms of governance, resident population, municipal functions, and financial standing follows.

¹ State law defines “subject agency” to mean any district or city for which a change of organization or reorganization is proposed.

- **County SD** is a dependent special district governed by the County of San Diego and serves as successor agency to a multi-agency consolidation completed in 2010. The lone active service function is wastewater (collection, treatment, and disposal classes). The jurisdictional boundary spans 46 square miles – or 29,571 acres – and is divided between seven distinct service areas with a combined LAFCO estimated resident population of 141,950. The affected territory lies in the greater “Spring Valley” service area. This is the largest service area with an estimated resident population of 92,717 and an accompanying average annual growth rate of 0.63% since 2010. County SD convey flows to the City of San Diego’s adjacent collection system and thereafter to the Point Loma Treatment Facility; the latter operated by the Metro Wastewater Joint Powers Authority with the District as one of the signatories. LAFCO established a sphere of influence for County SD in 2010 with an overall larger-than-agency designation. The sphere was most recently updated in 2019 and excludes 2,106 jurisdictional acres (mostly in the Bonita area) and includes 9,379 non-jurisdictional acres (mostly in Spring Valley area). The most recently prepared audit shows San Diego County SD’s net position at \$123.8 million as of June 30, 2021 and reflects an overall increase of 50.2% over the prior three fiscal years.

Affected Local Agencies

The affected territory presently lies within the jurisdictional boundaries and/or spheres of influence of 10 local agencies directly subject to San Diego LAFCO’s planning and regulatory responsibilities. These agencies qualify as “affected agencies” relative to the proposed change of organization and listed below.²

- County Service Area No. 135 (regional communications)
- City of Chula Vista (sphere only)
- Otay Water District
- Metropolitan Water District of Southern California
- San Diego County Water Authority
- San Diego Flood Control District
- San Diego County Water Authority
- San Diego County Street Lighting District
- Resource Conservation District of Greater San Diego County (sphere only)
- Bonita-Sunnyside Fire Protection District

The affected territory also lies within the following school and college districts, and accordingly receive notice of the proposal: Chula Vista Elementary School District; Sweetwater Union High School District; and Southwestern Community College District.

² State law defines “affected local agency” as any entity that contains, or would contain, or whose sphere contains or would contain, any territory for which a change of organization is proposed or ordered. Notice of the proposal and hearing were provided to the agencies.

DISCUSSION

This item is for San Diego LAFCO to consider approving – with or without discretionary modifications – the change of organization proposal to annex the affected territory to County SD for purposes of establishing wastewater services. The Commission may also consider applying conditions so long as it does not directly regulate land use, property development, or subdivision requirements. Additional discussion with respect to proposal purpose, development impacts, and Commission focus follows.

Proposal Purpose

The purpose of the proposed change of organization before San Diego LAFCO is to establish public wastewater service in support of an existing single-family residence within the affected territory and facilitate construction of an accessory dwelling unit. Extension of wastewater would add to existing services to the affected territory that include community planning, police, and roads from the County of San Diego, fire protection and emergency medical from Bonita-Sunnyside Fire Protection District, and domestic water from Otay Water District.

Current and Planned Development

The County of San Diego General Plan designates the affected territory as Semi-Rural Residential (SR-1) with a conforming zoning assignment of Rural Residential. This latter assignment provides a minimum parcel size of 1.0 acres, which would allow for a maximum density within the affected territory of two residential parcels. Each developed single-family residence would also facilitate additional intensity opportunities with the allowance of an accessory dwelling unit for each under County zoning. Additional intensity is also allowable under zoning with the construction of an accessory dwelling unit for each single-family residence. The affected territory separately lies within the City of Chula Vista sphere of influence as established by LAFCO. Chula Vista designates the affected territory as Low Residential with a unit range of 0-3 per acre. The City has not rezoned the affected territory.

Commission Focus

Three central and sequential policy items underlie San Diego LAFCO’s consideration of the proposed change of organization. These policy items take the form of determinations and orient the Commission to consider the stand-alone merits of a (a) sphere of influence amendment, (b) timing of the change of organization itself, and (c) whether modifications or approval terms are appropriate. The Commission must also consider other relevant statutes in and outside LAFCO law as further detailed in the proceeding section.

ANALYSIS

San Diego LAFCO’s analysis of the proposed change of organization is divided into two subsections. The first subsection pertains to evaluating the central issues referenced in the preceding section relative to both statutory and local policy considerations. The second subsection considers other germane issues and highlighted by applicability under the California Environmental Quality Act (CEQA).

Central Policy Items

Item No. 1 | Sphere of Influence Amendment

State law specifies all jurisdictional changes approved by San Diego LAFCO shall be consistent with the spheres of influence of the subject agencies. This statutory threshold – in most instances – would necessitate the Commission consider an amendment to add the affected territory to County SD’s sphere of influence to accommodate the proposed annexation. The statutory threshold is further prefaced on the Legislature defining spheres of influence to demark the appropriate current and future boundary and service area of the subject agency as determined by the Commission. However, and pertinently, the Commission has established a standing and unique practice specific to County SD to purposefully exclude jurisdictional lands in Bonita from the sphere of influence that are already in the City of Chula Vista’s sphere of influence. The underlying premise to this practice is to assign deference to Chula Vista as the ultimate service provider for Bonita when infrastructure and other timing issues materialize. Staff believes this practice continues to be meritorious and therefore for this proposal, no amendment to the sphere of influence is recommended.

CONCLUSION | MERITS OF A SPHERE OF INFLUENCE AMENDMENT

An amendment to include the affected territory with County SD’s sphere of influence is not warranted to accommodate the change of organization based on standing practice of San Diego LAFCO to avoid overlap with the City of Chula Vista’s sphere of influence. This action to retain and follow practice reaffirms the Commission’s interest for the City to serve as the ultimate and comprehensive service provider for the affected territory.

Item No. 2 | Change of Organization Timing

The timing of the change of organization involving annexation of the affected territory to the County SD for public wastewater service appears appropriate. This conclusion draws from the analysis of the statutory factors required for consideration of proposed jurisdictional changes along with the proposal’s conformance with locally adopted Commission policies. Most of the prescribed review factors and applicable policies focus on the effects of the proposed annexation on the service and financial capacities of the *receiving* agency, County SD (emphasis added). A summary of key conclusions generated in the review of these factors and policies with respect to service needs, capacities, and finances follow.

- Service Needs

Annexation of the affected territory to County SD would represent an orderly expansion of the District and its wastewater services and marked by accommodating an existing and planned need. Additional details follow.

 - Annexation of the affected territory to County SD for purpose of establishing public wastewater service is consistent with the adopted residential land use policies of the County of San Diego. Annexation is also – pertinently – consistent with the land use policies contemplated for the affected territory by the City of Chula Vista; the anticipated future land use authority for the affected territory as determined by the Commission and marked by inclusion in the City’s sphere.
 - The Commission has previously designated the City of Chula Vista as the ultimate wastewater service provider for the affected territory through the standing inclusion within the City’s sphere. However, and through established practice, annexation to the County SD is consistent with the Commission interim preference to accommodate the expansion of public wastewater services within this urbanizing area and ahead of future transition to Chula Vista.
 - Proceeding with the annexation of the affected territory to County SD parallels the expressed interest of the landowner as the initiating party to construct an accessory dwelling unit on the affected territory. This baseline needs help quantify the timing of the proposed change of organization.
- Service Capacities and Levels

County SD has available and sufficient collection and contracted treatment capacities to accommodate projected service demands in the affected territory at its planned maximum uses. Additional details follow.

- An existing County SD wastewater main is located north of the affected territory within the public right-of-way on San Miguel Road and accessible through an approximate 2,500-foot private lateral connection³.
- It is projected the maximum average day wastewater flow generated within the affected territory based on two residential units divided between one single-family residence and one accessory dwelling unit is 480 gallons. This projected amount can be readily accommodated by County SD and represents 0.0053% of its available treatment capacity remaining within its wastewater system.⁴ Ultimate buildout would include two additional units and increase the average day wastewater flow to 960 gallons per day or 0.011% of the remaining available capacity
- Service Funding and Costs

County SD has adequate financial resources and administrative controls to provide wastewater services to the affected territory in support of its current and planned development without adversely impacting current ratepayers. County SD's recent audited statements reflects the District's strong liquidity and capital levels and highlighted by a current ratio of 46:1 and debt ratio of less than 1.0%. These measurements provide reasonable assurances of the District's effective financial management and helps lessen concerns regarding recent operating losses that are marked by an average total margin of (3.4%) over the last three fiscal years. Establishing actual wastewater service is premised on the landowner paying a connection fee to County SD of \$300. The landowner would subsequently pay an annual wastewater charge of \$517 for each dwelling unit.

**CONCLUSION |
MERITS OF CHANGE OF ORGANIZATION TIMING**

The timing of the change of organization to annex the affected territory to County SD to accommodate public wastewater service is warranted. Justification is marked by the preceding analysis and appropriately syncs the need for public wastewater service in a developing area in a manner responsive to existing infrastructure. Additional analysis supporting the conclusion is provided in Appendix A.

³ The property owner would be responsible for extending the existing sewer main located on Proctor Valley Road. The proposed sewer main will need to be conducted with a sewer easement granted to the County of San Diego SD.

⁴ San Diego County SD's existing average day wastewater flow is 10.0 million gallons, which equals 53% of overall capacity allowed within the Metropolitan Wastewater System operated by the City of San Diego. The allowable maximum wastewater flow capacity of the San Diego County Sanitation District within METRO is 19 million gallons per day.

Item No. 3 | Modifications and Terms

No modifications to the submitted change of organization have been identified by San Diego LAFCO staff meriting Commission consideration at this time. This includes conformation that the annexation of the affected territory would not generate any corridors and/or otherwise illogical jurisdictional features. Staff is recommending applying standard terms of approval.

CONCLUSION | MODIFICATIONS AND TERMS

No modifications appear warranted. Standard approval terms are recommended and include receipt of all remaining payments associated with the processing of the proposal by the Commission through recordation.

Other Statutory Considerations

Exchange of Property Tax Revenues

California Revenue and Taxation Code Section 99(b)(6) requires the adoption of a property tax exchange agreement by the affected local agencies before San Diego LAFCO can consider any jurisdictional change unless an applicable master agreement applies. The associated statutes also empower the County of San Diego to make all related property tax exchange determinations on behalf of special districts. Staff has confirmed the County Board of Supervisors has adopted a master agreement to govern the tax exchange for the proposed change of organization (resolution 09-184). The master agreement specifies no transfer of property taxes would occur following the annexation of the affected territory to County SD.

Environmental Review

San Diego LAFCO is obligated under CEQA to assess whether environmental impacts would result from activities approved under the Commission’s authority, either as a lead or responsible agency. LAFCO serves as lead agency under CEQA for this proposal given it has been initiated by landowner petition. Staff believes it would be appropriate for the Commission to find this action – and specifically the annexation of the affected territory to the County SD – as a project under CEQA but exempt from further review under State CEQA Guidelines Section 15319(a) and its cross-reference to Section 15303 (Class 3). This exemption appropriately applies given the proposed change of organization would not accommodate potential development beyond the statute’s threshold of no more than three single-family residences in an urban area based on current zoning.

Protest Proceedings

Protest proceedings for the proposed change of organization may be waived by San Diego LAFCO should the Commission proceed with an approval under Government Code 56662. The recommended waiver appropriately applies under this statute given the affected territory is uninhabited as defined under LAFCO law (i.e., less than 11 voters); the subject agency has not filed an objection to the waiver; and the landowner consents to the underlying action.

RECOMMENDATION

Staff recommends approval of the change of organization as submitted along with standard terms. This recommendation is consistent with Alternative One in the proceeding section.

ALTERNATIVES FOR ACTION

The following alternative actions are available to San Diego LAFCO:

Alternative One (recommended):

Adopt the attached draft resolution approving the change of organization proposal as submitted along with standard approval terms and protest hearing waiver.

Alternative Two:

Continue consideration to the next regular meeting.

Alternative Three:

Disapprove the change of organization proposal with direction to staff to return at the next regular meeting with a conforming resolution for adoption.

PROCEDURES FOR CONSIDERATION

This item has been placed on San Diego LAFCO's agenda as part of the consent calendar. A successful motion to approve the consent calendar will include taking affirmative action on the staff recommendation unless otherwise specified.

On behalf of the Executive Officer,



Carolanne Ieromnimon
Analyst I

Appendix:

A) Analysis of Proposal Review Factors

Attachments:

- 1) Vicinity Map of the Affected Territory
- 2) Draft Resolution of Approval
- 3) Application Materials

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APPENDIX A

Government Code Section 56668 Proposal Review Factors

- a) **Population and population density; land area and land use; per capita assessed valuation; topography, natural boundaries, and drainage basins; proximity to other populated areas; the likelihood of significant growth in the area, and in adjacent areas, in the next 10 years.**
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The affected territory as submitted comprises one 2.53-acre unincorporated parcel in the unincorporated community of Bonita. The subject parcel is developed with a single-family residence at 6638 Jonel Way (APN 585-113-05) and presently occupied with six residents. The affected territory lies within an urban-residential area with moderate growth anticipated in the surrounding area within the next 10-year period. Total assessed value (land and structures) of the subject parcel is \$851,700 with the last transaction recorded in April 2021.

- b) **The need for municipal services; the present cost and adequacy of municipal services and controls in the area; probable future needs for those services and controls; probable effect of the proposed incorporation, formation, annexation, or exclusion and of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas.**
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The County of San Diego serves as the primary purveyor of general governmental services to the affected territory. These governmental services include community planning, roads, and police protection. Other pertinent service providers include County Service Area No. 135 (regional communications), Otay WD (domestic water), and Bonita-Sunnyside Fire Protection District (fire protection and emergency medical). This proposal affects only wastewater and is the focus of the succeeding analysis.

- **Extending Public Wastewater to Affected Territory**

The affected territory and its existing residential use are currently dependent on an on-site underground septic disposal system. Following annexation, the existing septic system would be backfilled and abandoned as part of the connection to County SD wastewater services. Connection to County SD is readily available through an approximate 2,500-foot lateral to an existing wastewater main located within public right-of-way on San Miguel Road. The projected average daily wastewater flow for the affected territory at its maximum use under current zoning is 480 gallons and would accommodate two residences (one single-family residence and one accessory dwelling unit). This projected amount can be readily accommodated by County SD and represents 0.0053% of its available treatment capacity remaining within its wastewater system. Ultimate buildout would include two additional units and increase the average day wastewater flow to 960 gallons per day or 0.011% of the remaining available capacity.

c) The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on local governmental structure.

Approving the change of organization and annexation therein to County SD would establish economic and social ties between the District and the affected territory. These ties would mirror the overall region and based on mutual interest therein in accommodating urban growth with urban wastewater services

d) The conformity of the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies/priorities set forth in G.C. Section 56377.

Approving the proposed change of organization and annexation to County SD would facilitate the extension of public wastewater services to the existing single-family residence currently comprising the affected territory and the planned accessory dwelling unit. Approval would be consistent with the Commission's adopted policies to sync urbanized uses with urbanized services. The affected territory does not contain "open-space" as defined under LAFCO law and no conflicts exists under Government Code Section 56377. Additional analysis concerning conformance with germane Commission policies follows.

- San Diego LAFCO Policy L-107 requires applicants to disclose and address potential jurisdictional issues associated with their proposals and if applicable requires a consultation process with affected agencies, interested parties, or organizations to help discuss and potentially remedy concerns unless waived by the Executive Officer. No jurisdictional disputes or related concerns were identified or disclosed by the applicant or by affected agencies or interested parties in the review of the proposal.

e) The effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by G.C. Section 56016.

The affected territory does not contain "prime agricultural land" or "agricultural land" as defined under LAFCO law. Specifically, the affected territory does not contain lands currently used for any of the following purposes: producing an agricultural commodity for commercial purposes; left fallow under a crop rotational program; or enrolled in an agricultural subsidy program. Approval of the proposal and annexation to County SD would have no effect on maintaining the physical and economic integrity of agricultural lands.

f) The definiteness and certainty of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment, the creation of islands or corridors of unincorporated territory, and other similar matters.

LAFCO is in receipt of a draft map and geographic description of the affected territory that details metes and bounds that appears consistent with the standards of the State Board of Equalization and conforming with lines of assessment. LAFCO approval would be conditioned

on approval of the map and geographic description by the County Assessor’s Office and address any modifications enacted by the Commission.

g) A regional transportation plan adopted pursuant to Section 65080.

The proposed change of organization would extend wastewater service to one existing single-family residence and one planned accessory dwelling unit. The proposal and its anticipated outcomes do not generate any known conflicts with *San Diego Forward*, the regional transportation plan adopted by the San Diego Association of Governments.

h) Consistency with the city or county general and specific plans.

The affected incorporated territory is presently designated for semi-rural residential use under the adopted land use policies of the County of San Diego. The affected territory is zoned as Semi-Rural Residential (SR-1), which prescribes a minimum parcel size of 1.0 acres. The existing and planned residential uses are consistent with the proposal’s purpose to provide public wastewater to the existing single-family residence and planned accessory dwelling unit.

i) The sphere of influence of any local agency affected by the proposal.

See page 5 of the agenda report.

j) The comments of any affected local agency or other public agency.

Notice of the submitted change of organization proposal was distributed to all affected and subject agencies as required under LAFCO law. Notices were also provided to all local college and school districts. No written comments on the proposal were received ahead of preparing this agenda report for distribution on October 31, 2022.

k) The ability of the newly formed or receiving entity to provide the services which are the subject of the application to the area, including the sufficiency of revenues for those services following the proposed boundary change.

Information collected and reviewed as part of this proposal indicates County SD has sufficient and available financial resources and administrative controls therein relative to providing public wastewater to the affected territory without adversely impacting existing ratepayers. This statement is supported by the following factors.

- San Diego County SD’s last audit covers 2020-2021 and shows the District finished with ample liquidity levels with an agency-wide current ratio of 46.5 (i.e., \$46.46 in current assets for every \$1.00 in current liabilities).
- San Diego County SD finished 2020-2021 with high capital levels and marked by a low debt ratio of 0.80% (i.e., only \$0.80 out of every \$100.00 in net assets are financed.)

- San Diego County SD has experienced a downward trend in each of the last three audited fiscal years with an average total margin of (3.4%). The most recent year – 2020-2021 – the District finished with an overall total margin of (19.8%).

l) Timely availability of adequate water supplies for projected needs as specified in G.C. Section 65352.5.

The affected territory’s existing residential uses are presently within and connected to Otay WD’s retail potable water system with wholesale supplies provided by the San Diego County Water Authority. Approval of the proposed change of organization would not affect the timely availability of water supplies to the affected territory.

m) The extent to which the proposal will affect a city or cities and the county in achieving their respective fair shares of the regional housing needs as determined by the appropriate council of governments.

The proposed change of organization would not impact any local agencies in accommodating their regional housing needs. All potential units tied to the lands are already assigned to the County of San Diego by the region’s council of governments. The annexation to the County SD would not affect this assignment.

n) Any information or comments from the landowners, voters, or residents.

The affected territory is considered uninhabited as defined by LAFCO law (containing 11 registered voters or less). The landowners support the proposed change of organization and have provided written consent to the proceedings.

o) Any information relating to existing land use designations.

See above analysis for (h).

p) The extent to which the proposal will promote environmental justice.

The change of organization is expected to aid and/or otherwise promote environmental justice by enhancing wastewater and integrated public safety services within the affected territory and for any groups that are susceptible to pollution burdens and their effects. This latter category – notably – low-income communities, communities of color, tribal nations, and other disadvantaged groups. Consideration of existing environmental justice factors within the affected territory draw on staff analyzing data available from the California Environmental Protection Agency through its online assessment tool (CalEnviroScreen 4.0). Two composite percentile rankings for the affected territory are generated within this analysis and involves (a) pollution burdens and (b) susceptible population to pollution burdens relative to all census tracts in California.

The affected territory’s composite pollution burden ranking falls in the 10 percentile with an internal range between 0 to 77.3 percentiles. Six pollution burdens exceed the 33 percentile and involve air quality (ozone and PM 2.5), toxic releases, drinking water contaminants, impaired water and solid waste, and considered moderate in magnitude. One of these six pollution burdens – impaired water – also exceed the 70 percentile and is considered significant in magnitude. The affected territory’s composite susceptible population ranking falls in the 11.5 percentile with an internal range between 6.4 to 46.9 percentiles. Two of these at-risk groups exceeds the 33 percentile and involves low birth weight and unemployment.

A summary of all tracked pollution burdens and susceptible population follows.

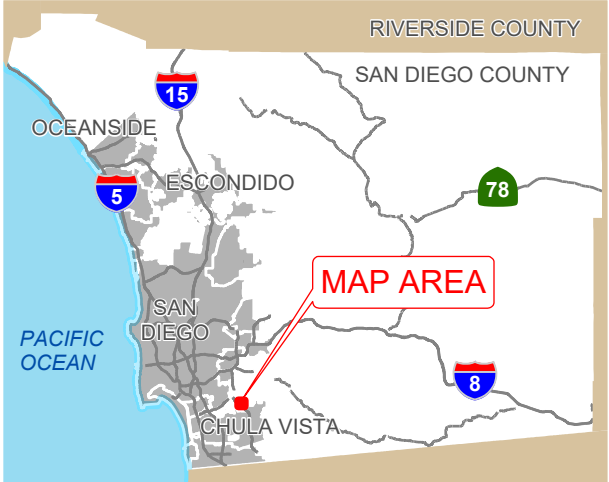
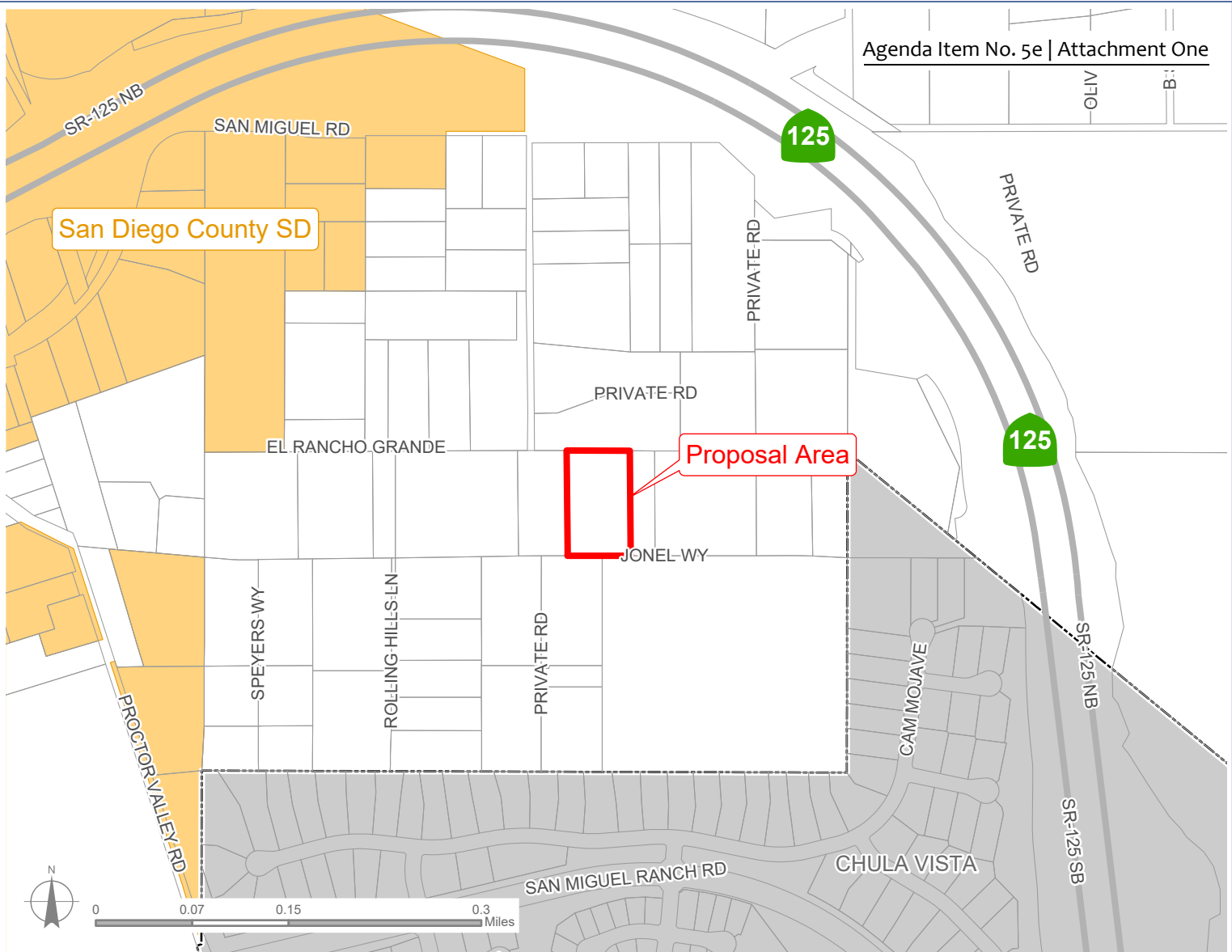
APN 515-113-05	
Pollution Burdens and Susceptible Population	
Table 2.6a (Source: California Environmental Protection Agency and SD LAFCO)	
Factor	Affected Territory + Surrounding Lands
Census Tract No.	60730134-10
Estimated Population	7,827
Pollution Burden	Weighted Percentile
... Composite Score	16.55
... Percentile	10.15
Indicator Air Quality: Ozone	40.05
Indicator Air Quality: PM 2.5:	52.21
Indicator Air Quality: Diesel PM:	13.55
Indicator Pesticides:	0.00
Indicator Toxic Releases:	45.54
Indicator Traffic:	29.26
Indicator Drinking Water Contaminants:	49.38
Indicator Lead in Housing:	10.80
Effects Cleanup Sites:	0.00
Effects Groundwater Threats:	0.00
Effects Hazardous Waste:	29.24
Effects Impaired Water:	77.30
Effects Solid Waste:	35.72
Sensitive Population	Weighted Percentile
... Percentile	11.52
Population Asthma:	8.24
Population Low Birth Weight:	38.18
Population Cardiovascular Disease:	6.37
Population Education:	28.08
Population Linguistic Isolation:	n/a
Population Poverty:	22.47
Population Unemployment:	46.99
Population Housing Burden:	19.81

- q) Information contained in a local hazard mitigation plan, information contained in a safety element of a general plan, and any maps that identify land as a very high fire hazard zone or maps that identify land determined to be in a state responsibility area, if it is determined that such information is relevant to the affected territory.**
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The County of San Diego General Plan contains a hazard mitigation plan for potential fire, flooding and earthquakes. The affected territory lies within a wildfire hazard area.

- r) Section 56668.3(a)(1) Whether the proposed annexation will be for the interest of the landowners or present or future inhabitants within the district and within the territory proposed to be annex to the district.**
-

Approval of the change of organization would be in the best interest of the current and future landowners and/or residents of the affected territory by providing access to reliable public wastewater service going forward. Approval would also benefit adjacent landowners and/or residents by eliminating the operation of a private septic system and the potential therein for failures.



CO22-15 "TODI - JONEL WAY CHANGE OF ORGANIZATION" | ANNEXATION TO SAN DIEGO COUNTY SANITATION DISTRICT

- Proposal Area
- San Diego County SD
- SOI = Sphere of Influence



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RESOLUTION NO. _____

SAN DIEGO COUNTY LOCAL AGENCY FORMATION COMMISSION

MAKING DETERMINATIONS, APPROVING, AND ORDERING A CHANGE OF ORGANIZATION

**“TOIDI-JONEL WAY CHANGE OF ORGANIZATION”
ANNEXATION TO SAN DIEGO COUNTY SANITATION DISTRICT (CO22-15)
LAFCO FILE NO. CO21-05**

WHEREAS, on October 10, 2022, interested landowner – Jesus Santoyo (Toidi Inc) – filed a petition to initiate proceedings and an application with the San Diego County Local Agency Formation Commission, hereinafter referred to as “Commission,” pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000; and

WHEREAS, the application seeks approval of a change of organization to annex 2.53 acres of unincorporated territory within Bonita to the San Diego County Sanitation District (SD) for purposes of established wastewater services; and

WHEREAS, the affected territory as proposed includes one legal parcel that is developed with a single-family residence and identified by the County of San Diego Assessor’s Office as 585-113-05; and

WHEREAS, an applicable master property tax transfer agreement applies to the proposed change of organization dated September 16, 2009; and

WHEREAS, the Commission’s Executive Officer has reviewed the proposed change of organization and prepared a report with recommendations; and

WHEREAS, the Executive Officer’s report and recommendations on the proposal have been presented to the Commission in the manner provided by law; and

WHEREAS, the Commission heard and fully considered all the evidence presented at a noticed public meeting on the proposal on November 7, 2022; and

WHEREAS, the Commission considered all the factors required by law under Government Code Sections 56668 as well as adopted local policies and procedures.

NOW, THEREFORE, THE COMMISSION DOES HEREBY RESOLVE, DETERMINE, AND ORDER as follows:

1. The public meeting was held on the date set therefore, and due notice of said meeting was given in the manner required by law.

2. At the public meeting, the Commission considered the Executive Officer's report.
3. The Commission serves as lead agency for environmental review of the proposed change of organization under the California Environmental Quality Act (CEQA) as detailed in the Executive Officer's report. The Commission's findings follow.
 - a) The Commission serves as lead agency under CEQA for assessing potential impacts of the proposal and specifically the annexation and extension of public wastewater service to the affected territory. The proposal qualifies as a project but is exempt from further review under State CEQA Guidelines Section 15319(b) and its cross-reference to Section 15303. This exemption appropriately applies given the proposed change of organization would not accommodate potential development beyond the statute's threshold of no more than three single-family residences in an urban area based on current zoning.
4. The Commission APPROVES the change of organization without modifications as described below and subject to conditions as provided. Approval involves all of the following:
 - a) Annexation of the affected territory to the San Diego County SD as shown in "Exhibit A-1" and "Exhibit A-2".
 - b) Annexation is limited to authorizing San Diego County SD to provide wastewater service to the affected territory; water service remains the exclusive responsibility of the Otay Water District.
5. The Commission CONDITIONS all approvals on the following terms being satisfied by November 7, 2023 unless an extension is requested in writing and approved by the Executive Officer:
 - a) Completion of the 30-day reconsideration period provided under Government Code Section 56895.
 - b) Submittal to the Commission of final map and geographic description of the affected territory as approved by the Commission conforming to the requirements of the State Board of Equalization – Tax Services Division.
 - c) Submittal to the Commission of the following payments:
 - A check made payable to LAFCO in the amount of \$50.00 for the County of San Diego-Clerk Recorder to reimburse for filing a CEQA Notice of Exemptions consistent with the findings in the resolution.
 - A check made payable to the State Board of Equalization for processing fees in the amount of \$350.00.

6. The Commission assigns the proposal the following short-term designation:
“Toidi-Jonel Way Change of Organization”
7. The affected territory as designated by the Commission is uninhabited as defined in Government Code Section 56046.
8. The Commission waives conducting authority proceedings under Government Code Section 56662.
9. The San Diego County Sanitation District is a registered-voter district.
10. The San Diego County Sanitation District utilizes the County of San Diego assessment roll.
11. The affected territory will be liable for any existing bonds, contracts, and/or obligations of the San Diego County Sanitation District as provided under Government Section 57328.
12. The effective date of the approval shall be the date of recordation but not before the completion of a 30-day reconsideration period and only after all terms have been completed as attested by the Executive Officer.
13. As allowed under Government Code Section 56107, the Commission authorizes the Executive Officer to make non-substantive corrections to this resolution to address any technical defects, errors, irregularities, or omissions.
14. The Executive Officer is hereby authorized and directed to mail copies of this resolution as provided in Sections 56880-56882 of the Government Code.
15. The Executive Officer is further authorized and directed to prepare, execute, and record a Certificate of Completion, make the required filings with the County Assessor, County Auditor, and the State Board of Equalization as required by Section 57200, et seq., of the Government Code.

**

PASSED AND ADOPTED by the Commission on November 7, 2022 by the following vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

**

Attest:

Keene Simonds
Executive Officer

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EXHIBIT A-1
MAP OF THE AFFECTED TERRITORY

-Placeholder-

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EXHIBIT A-2
GEOGRAPHIC DESCRIPTION OF THE AFFECTED TERRITORY

-Placeholder-

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Blank for Photocopying

RECEIVED

OCT 10 2022

CHANGE OF ORGANIZATION OR REORGANIZATION APPLICATION

SAN DIEGO LAFCO

The information in this application is used by LAFCO staff to evaluate proposals for changes of government organization. Please respond to all items in this form, indicating "NA" when an item does not apply.

SUBJECT AGENCY(IES) (City or Special District)	PROPOSED CHANGE OF ORGANIZATION/ACTION (Annexation, detachment, sphere amendment, etc.)
1. San Diego County Sanitation District	1. Annexation
2. _____	2. _____
3. _____	3. _____
4. _____	4. _____

As part of this application, the city of _____ or the San Diego County district, Alonso Gonzalez (the applicant), and/or the Toldi Inc. (real party in interest: subject landowner and/or registered voter) agree to defend, indemnify, hold harmless, and release the San Diego LAFCO, its agents, officers, attorneys, and employees from any claim, action, or proceeding brought against any or all of them, the purpose of which is to attack, set aside, void, or annul the approval or denial of this application or adoption of or refusal to adopt the environmental document which accompanies it or any other action San Diego LAFCO takes with respect to this application. This defense and indemnification obligation shall include, but not be limited to, attorneys' fees and other costs of defense, damages, costs, and expenses, including attorney fees payable to another party. The person signing this application will be considered the proponent for the proposed action(s) and will receive all related notices and other communications. San Diego LAFCO's acceptance of this application is sufficient to make this agreement a binding, bilateral contract between us.

I acknowledge that annexation to the city of _____ or the San Diego County Sewer district may result in the imposition of taxes, fees and assessments **existing within the (city or district)** on the effective date of annexation. I hereby waive any rights I may have under Articles XIII C and XIII D of the State Constitution (Proposition 218) to a hearing, assessment ballot proceeding or an election on those **existing taxes, fees and assessments**.

Agreed:

Signature:  Date: 10-1-22

Print/Type Name: Alonso Gonzalez

Address: 1320 Fifth Ave
San Diego CA 92101 Telephone: () 619 921-9160

Property Address: 6640 Jonel Way. Bonita CA 91902

Cross Street(s): Proctor Valley Road

Assessor Parcel Number(s): 585-113-0500 Acres: 2.53

Indicate below if anyone, in addition to the person signing this application, is to receive notices of these proceedings.

Name: Jesus Santoyo

Address: 6645 Jonel Way
Bonita, CA 91902 Telephone: () 619 733-0226

CHANGE OF ORGANIZATION OR REORGANIZATION APPLICATION

The information in this application is used by LAFCO staff to evaluate proposals for changes of government organization. Please respond to all items in this form, indicating "NA" when an item does *not* apply.

SUBJECT AGENCY(IES) (City or Special District)	PROPOSED CHANGE OF ORGANIZATION/ACTION (Annexation, detachment, sphere amendment, etc.)
1. San Diego County Sewer District	1. Annexation
2. _____	2. _____
3. _____	3. _____
4. _____	4. _____

As part of this application, the city of _____ or the San Diego County Sewer district, Nencini Associates _____ (the applicant), and/or the _____ (real party in interest: subject landowner and/or registered voter) agree to defend, indemnify, hold harmless, and release the San Diego LAFCO, its agents, officers, attorneys, and employees from any claim, action, or proceeding brought against any or all of them, the purpose of which is to attack, set aside, void, or annul the approval or denial of this application or adoption of or refusal to adopt the environmental document which accompanies it or any other action San Diego LAFCO takes with respect to this application. This defense and indemnification obligation shall include, but not be limited to, attorneys' fees and other costs of defense, damages, costs, and expenses, including attorney fees payable to another party. The person signing this application will be considered the proponent for the proposed action(s) and will receive all related notices and other communications. San Diego LAFCO's acceptance of this application is sufficient to make this agreement a binding, bilateral contract between us.

I acknowledge that annexation to the city of _____ or the San Diego County Sewer district may result in the imposition of taxes, fees and assessments **existing within the (city or district)** on the effective date of annexation. I hereby waive any rights I may have under Articles XIII C and XIII D of the State Constitution (Proposition 218) to a hearing, assessment ballot proceeding or an election on those **existing taxes, fees and assessments.**

Agreed:

Signature: _____ Date: _____

Print/Type Name: _____

Address: _____

Telephone: () _____

Property Address: _____

Cross Street(s): _____

Assessor Parcel Number(s): _____ Acres: _____

Indicate below if anyone, in addition to the person signing this application, is to receive notices of these proceedings.

Name: _____

Address: _____

Telephone: () _____

A. PROPOSAL DESCRIPTION/JUSTIFICATION

1. Explain in detail why the proposal is necessary *at this time* (e.g., condition of an approved tentative map, an existing structure requires new services, etc.). The proposed accessory dwelling unit at the subject property will require new sewer service.

2. Describe the use of *developed* property within the proposal territory, including details about existing structures. Describe anticipated development of *vacant* property, including types of buildings, number of units, supporting facilities, etc., and when development is scheduled to occur. _____

The developed property in the proposal territory consists of a residential lot (zoned Rural Residential) containing a 1,547 square foot single-family residence. Proposed development consists of the addition of an accessory dwelling unit to the property. Access to the property is along a private asphalt-paved roadway (Jonel Way) located to the east of Proctor Valley Road.

3. Describe the topography and physical features of the proposal territory, as well as its general location in relation to communities, major freeways/highways, roads, etc. _____

The proposal territory consists of an asphalt roadway (private) which runs eastward from Proctor Valley Road to the subject property. The subject property is lightly-vegetated (trees and scrub) and is generally flat. The territory is located south and west of the South Bay Expressway.

4. How many residents live within the proposal territory? _____

5. How many of these residents are registered voters? _____

6. Are there any jurisdictional issues associated with the LAFCO proposal or pending LAFCO action?

NO YES (If yes, please complete the Policy L-107 form at http://www.sdlafco.org/forms/Legislative_Policy_L_107.pdf)

B. LAND USE INFORMATION

GENERAL PLAN AND ZONING:

If the proposal territory is *not* within an incorporated city, San Diego County General Plan and zoning information may be obtained by calling (858) 565-5981 or toll-free (888) 267-8770 with the Assessor Parcel Number(s) of the subject property. If the proposal territory is within a city, please call the appropriate city's planning department for General Plan and zoning information.

1. COUNTY:

(a) The territory is within the Sweetwater _____ community plan.

(b) The County General Plan or community plan designation and allowed density: _____
Sweetwater community plan; one dwelling unit per acre

(c) Current County zoning and allowed density: Semi-Rural Residential (SR-1); one dwelling unit per acre

2. CITY:

(a) The territory is within the general plan area for the City of _____

(b) The City General Plan land use designation and allowed density: _____

(c) Current City zoning and allowed density: _____

(d) Current City rezoning and allowed density: _____

3. Indicate below *all* permits or approvals that will be needed by the County or any city to complete the project. If already granted, please note the date of approval and attach a copy of each resolution of approval. If approval is pending, please note the anticipated approval date.

Type of Approval or Permit	File No.	Approval Date	Is Resolution Attached?
Tentative Subdivision Map			<input type="checkbox"/> YES <input type="checkbox"/> NO
Tentative Parcel Map			<input type="checkbox"/> YES <input type="checkbox"/> NO
Major Use Permit			<input type="checkbox"/> YES <input type="checkbox"/> NO
City/County General Plan Amendment			<input type="checkbox"/> YES <input type="checkbox"/> NO
City Rezoning			<input type="checkbox"/> YES <input type="checkbox"/> NO
County Rezone			<input type="checkbox"/> YES <input type="checkbox"/> NO
(Other)			<input type="checkbox"/> YES <input type="checkbox"/> NO

4. Describe the land uses surrounding the proposal territory (e.g., residential, commercial, agricultural, industrial, open space, etc.).

North: Residential East: Residential
 South: Residential West: Residential

5. Indicate with a if any portion of the proposal territory contains the following:

- Agricultural land uses Agricultural Preserve
- Open Space Easement Slopes greater than 25%
- Sewer moratorium area Coastal Permit Zone
- Unusual features such as: _____

6. For city annexation proposals: Is any part of the proposal territory under a Williamson Act contract? If yes, please contact the LAFCO office for special instructions regarding petition/resolution of application requirements. YES NO

C. PUBLIC SERVICES INFORMATION

SEWER SERVICE:

- 1. (a) Is the proposal territory within a district or city that provides public sewer service? YES NO
(b) *If yes*, which agency? _____
- 2. (a) Is a developed parcel in need of annexation due to failed septic system? YES NO
(b) *If yes*, include a copy of any letters from the San Diego County Department of Environmental Health or private septic-system company.
(c) *If no*, is annexation for sewer service part of this application? YES NO
- 3. If annexation for sewer service is proposed, which district or city would serve the territory if this jurisdictional change is approved? San Diego County Sewer
- 4. (a) Has the agency that will be providing service issued a letter of sewer availability? YES NO
(b) *If yes*, please provide a copy of the letter with this application. (This documentation should be completed by the agency no longer than 6 months prior to submittal to LAFCO.)
- 5. (a) Will the agency be prepared to furnish sewer service upon annexation? YES NO
(b) *If no*, please explain: _____

WATER SERVICE:

- 1. (a) Is the proposal territory within a district or city that provides public water service? YES NO
(b) *If yes*, which agency? Otay Water District
- 2. Is a well or other on-site water system currently used on the property? YES NO
- 3. Is an on-site system proposed to be used when the property is developed? YES NO
- 4. (a) Is annexation for water service part of this application? YES NO
(b) *If yes*, which district or city would serve the territory if this jurisdictional change is approved? _____
(c) Will the agency that will be providing service be prepared to furnish water service upon annexation? YES NO
- 5. (a) Has the agency that will be providing service issued a letter of water availability? YES NO
(b) *If yes*, please provide a copy of the letter with this application. (This documentation should be completed by the agency no longer than 6 months prior to submittal to LAFCO.)

FIRE PROTECTION SERVICES: NOTE: Complete the following section *only* if annexation to a fire protection service provider is proposed—or if the current fire protection service provider is proposed to change.

1. (a) Is the proposal territory *currently* within an agency that provides fire protection? YES NO

(b) *If yes*, provide name and address/location of current fire service provider

Bonita-Sunnyside

(c) Provide estimated response times to the proposal territory:

priority _____ minutes; non-priority _____ minutes

2. Is annexation for fire protection service part of this application? YES NO

3. Which city or district would serve the proposal territory if this jurisdictional change is approved?

(a) Location/address of the proposed fire service provider: _____

(b) Estimated response times to the proposal territory:

Priority _____ minutes; non-priority _____ minutes

POLICE PROTECTION SERVICES: NOTE: Complete the following section *only* if the police protection provider is proposed to change.

1. Which police agency *currently* serves the proposal territory?

(a) Location/address of nearest police station: _____

(b) Estimated response times to the proposal territory: priority _____ minutes; non-priority _____ minutes

2. Which police agency would serve the proposal territory if this jurisdictional change is approved?

(a) Location/address of nearest police station: _____

(b) Estimated response times to the proposal territory:

Priority _____ minutes; non-priority _____ minutes

PETITION FOR PROCEEDINGS PURSUANT TO THE CORTESE-KNOX-HERTZBERG LOCAL GOVERNMENT REORGANIZATION ACT OF 2000

Part I: NOTICE OF INTENT TO CIRCULATE PETITION

Proponents are required to file a NOTICE OF INTENT TO CIRCULATE PETITION with the Executive Officer of the San Diego Local Agency Formation Commission before a petition to initiate a change of organization or reorganization can be circulated (Govt. Code § 56700.4).

1. Notice is hereby given to circulate a petition proposing to: extend the boundary of the San Diego County Sewer district
to a property currently not served

2. The reason(s) for the proposal are: the construction of an accessory dwelling unit (ADU) is proposed for the property, and the new
structure will require sanitary sewer service

Proponent's Name (print)

Signature of proponent or representative

Proponent's Address

City, State, Zip

Pursuant to Section 56700.4 of the California Government Code, this NOTICE OF INTENT TO CIRCULATE PETITION was filed with me on _____

Date

Executive Officer (Print and Sign)

PART II: DISCLOSURE REQUIREMENTS

The Political Reform Act prohibits a person appointed to the Local Agency Formation Commission from soliciting or accepting campaign contributions of more than \$250 within the preceding 12 months from parties, participants, or their agents while a proceeding is pending before LAFCO and for three months following the decision. LAFCO commissioners who receive such contributions are required to disqualify themselves from participating in the proceedings. Both commissioners and contributors who are parties to the proceeding are required to disclose the contributions received or made. Names of current LAFCO commissioners and LAFCO disclosure forms are available at [HTTP://WWW.SDLAFCO.ORG](http://www.sdlafco.org) or by calling 858/614-7755.

Pursuant to Government Code Section 56700.1, any person or combination of persons who, for political purposes, directly or indirectly contributes \$1,000 or more, or expend \$1,000 or more in support of, or in opposition to a proposal for a change of organization or reorganization that will be submitted to the Commission, shall disclose and report to the Commission to the same extent and subject to the same requirements of the Political Reform Act (Title 9 [commencing with Section 81000]) as provided for local initiative measures.

Pursuant to Government Code Section 57009, any person or combination of persons who directly or indirectly contributes \$1,000 or more, or expends \$1,000 or in support of, or in opposition to, the conducting authority proceedings for a change of organization or reorganization, must comply with the disclosure requirements of the Political Reform Act of 1974, (Government Code section 81000 et seq.). Applicable reports must be submitted to the Secretary of State and the appropriate city or county clerk. Copies of the reports must also be filed with the Executive Officer of San Diego LAFCO.

Part III: PETITION FOR CHANGE OF ORGANIZATION OR REORGANIZATION

This proposal is made pursuant to Part 3, Division 3, Title 5 of the California Government Code, Section 56000 et seq. of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.

(a) The specific change(s) of organization proposed is/are: extension of San Diego Sewer District boundary to parcel currently not with the territory

(b) The boundary of the territory included in the proposal is as described in the attached legal description and map and is by this reference incorporated herein.

(c) The proposed action(s) will be subject to the following terms and conditions: _____

(d) The reason(s) for the proposal is/are: provision of sanitary sewer service to an existing parcel due to the proposed construction of an accessory dwelling unit

(e) Signers of this petition have signed as (select one): landowner; registered voter.

(f) The name(s) and mailing address(s) of the chief petitioner(s) (not to exceed three) is/are:

1. _____
Name of chief proponent (print) mailing address

2. _____
Name of chief proponent (print) mailing address

3. _____
Name of chief proponent (print) mailing address

(g) It is requested that proceedings for this proposal be taken in accordance with Section 56000 et seq. of the Government Code.

(h) This proposed change of organization (select one) is is not consistent with the sphere-of-influence of any affected city or district.

(i) The territory included in the proposal is (select one) inhabited (12 or more registered voters) uninhabited (11 or less registered voters).

(j) If the formation of a new district(s) is included in the proposal:

1. The principal act under which said district(s) is/are proposed to be formed is/are: _____

2. The proposed name(s) of the new district(s) is/are: _____

3. The boundary(ies) of the proposed new district(s) is/are described in the attached legal description and map and are by this reference incorporated herein.

(k) If an incorporation is included in the proposal:

1. The name of the proposed city is: _____

2. Provisions are requested for appointment of: city manager city clerk city treasurer

(l) If the proposal includes a consolidation of special districts, the proposed name of the consolidated district is: _____

ANNEXATION NO. ??????
ANNEXATION TO SAN DIEGO SANITATION
DISTRICT GEOGRAPHIC DESCRIPTION

All that certain real property, situate in the SW Quarter of Section 21, Township 17 South, Range 1 West, San Bernardino Meridian, in the County of San Diego, State of California, described as follows:

Beginning at the NW corner of said SW Quarter;

Thence, (1) South 8945'07" East 480.00 Feet;

Thence, (2) South 8952'49" East 700.00 feet to the **Point of Beginning**;

Thence, (3) South 8952'49" East 253.00 feet;

Thence, (4) South 0007'47" East 435.86 feet;

Thence, (5) South 8952'52" East 254.97 feet;

Thence, (6) North 0007'47" East 435.86 feet to the **Point of Beginning** and containing **2.53** acres of land more or less.

For assessment purposes only. This description of land is not a legal property description as defined in the Subdivision Map Act and may not be used as the basis for an offer for sale of the land described.

COURSES

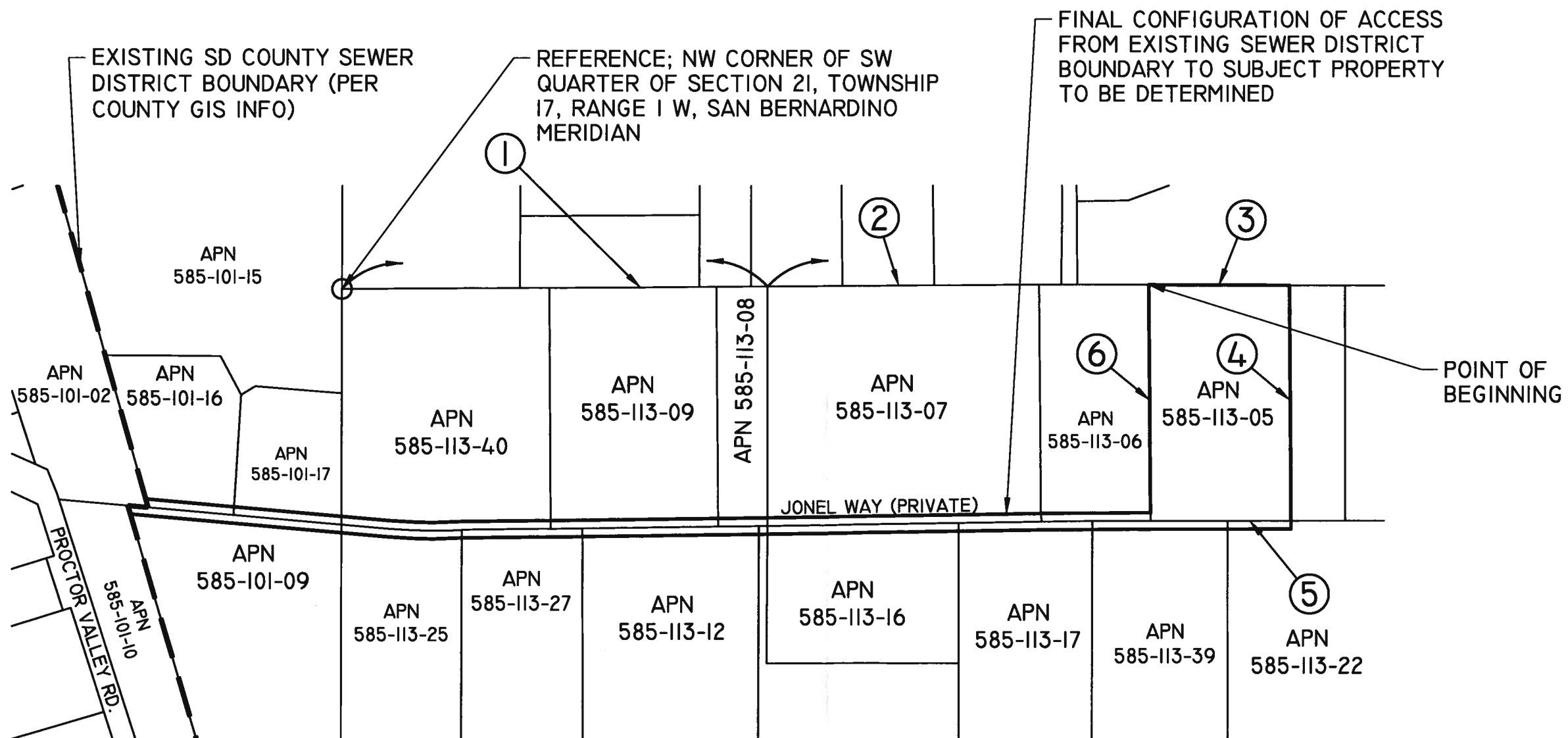
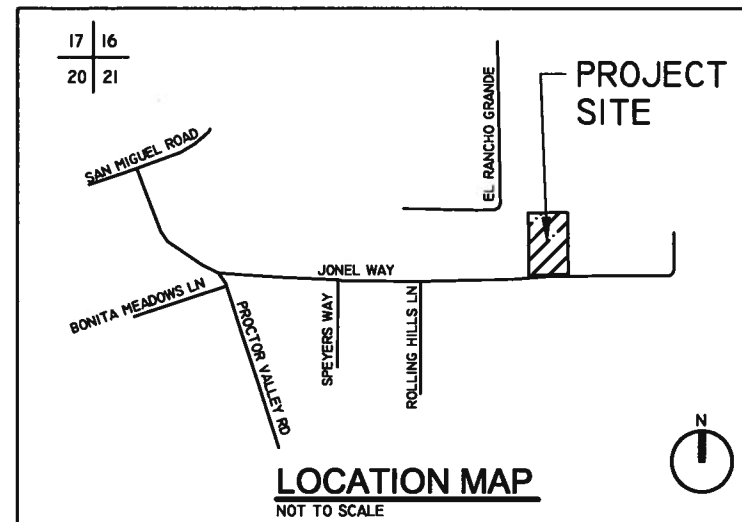
1. S89°45'07"E 480.00'
2. S89°52'49"E 700.00'
3. S89°52'49"E 253.00'
4. S00°07'47"E 435.86'
5. S89°52'52"E 254.97'
6. N00°07'47"E 435.86'

2.53 ACRES

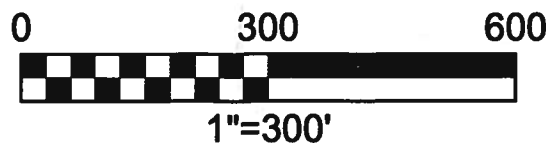
LEGEND

- EXISTING SAN DIEGO SANITATION DISTRICT BOUNDARY
- PROPOSED SAN DIEGO SANITATION DISTRICT BOUNDARY

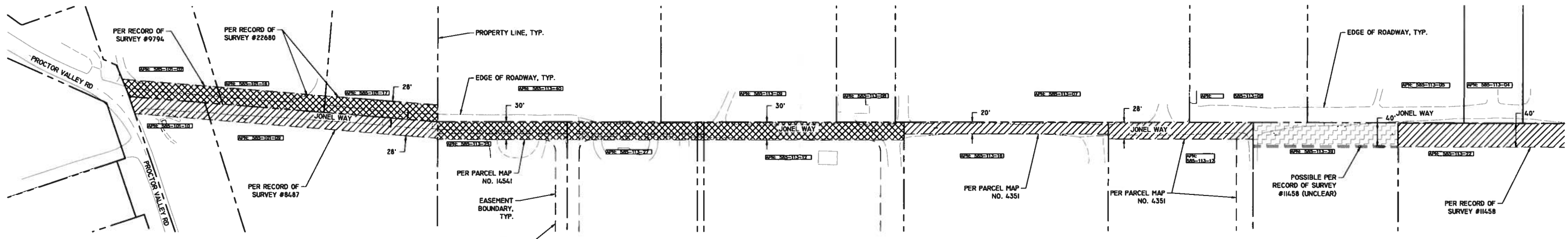
DISCLAIMER:
FOR ASSESSMENT PURPOSES ONLY. THIS DESCRIPTION OF LAND IS NOT A LEGAL PROPERTY DESCRIPTION AS DEFINED IN THE SUBDIVISION MAP ACT AND MAY NOT BE USED AS THE BASIS FOR AN OFFER FOR SALE OF THE LAND DESCRIBED.



PRELIMINARY - FOR REVIEW



ASSESSOR'S PARCEL NO.	LAFCO RESOLUTION NO.	ACREAGE	DATE	SCALE
APN 585-113-05	?????	2.53	09/28/2022	1"=100'
SD COUNTY SAN. DIST. ANNEXATION NO. ????			FJS ENGINEERING	
BEING A PORTION OF SECTION 7, T. 17S, R. 1E, S.B.M., SAN DIEGO COUNTY			TUCSON, AZ (520-490-3311)	

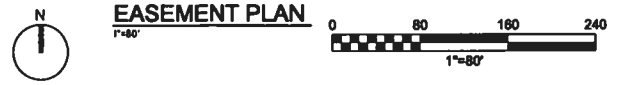


LEGEND

- EXISTING FEATURES:**
- PROPERTY LINE
 - EASEMENT BOUNDARY
 - PARCEL NO.
 - ROAD AND UTILITY EASEMENT
 - ROAD EASEMENT
 - POSSIBLE ROAD EASEMENT (RECORD UNCLEAR)

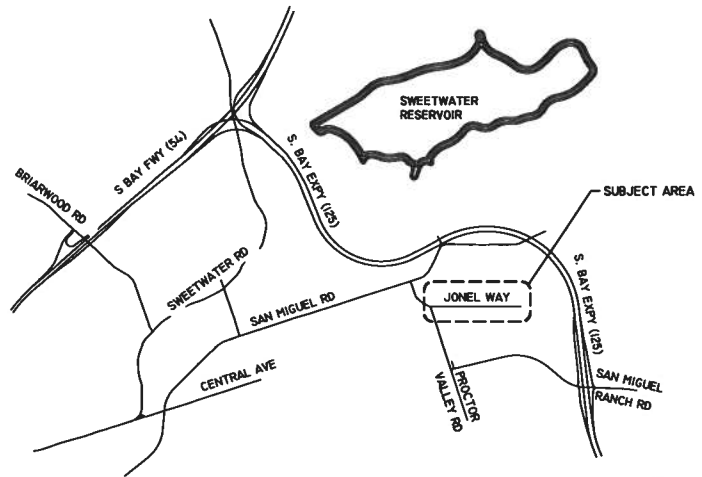
PRELIMINARY

EASEMENT PLAN



NOTE: THIS DRAWING IS NOT A RECORD OF SURVEY AND IS INTENDED FOR PLANNING PURPOSES ONLY. THE LOCATIONS OF PROBABLE EASEMENT ARE DEPICTED BASED ON A REVIEW OF SAN DIEGO COUNTY SURVEY RECORDS. CONFIRMATION OF A LEGAL BASIS FOR EXISTING EASEMENTS SHALL BE PROVIDED BY OTHERS.

PROPERTY LINE INFORMATION WAS OBTAINED FROM SANGIS ARCHIVES AND FROM EXISTING DIGITAL SURVEY RECORDS.



VICINITY MAP
NTS

FJS ENGINEERING
TUCSON, AZ
T: 520.490.3311
CONTACT@FJSENGINEERING.COM



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