

SACRAMENTO LOCAL AGENCY FORMATION COMMISSION
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October 4, 2006

TO: Sacramento Local Agency Formation Commission

FROM: Peter Brundage, Executive Officer

RE: **ELK GROVE COMMUNITY SERVICES DISTRICT -**
GALT FIRE PROTECTION DISTRICT REORGANIZATION
(04-06) [CEQA: Exemption]

RECOMMENDATION

1. Certify that the **Elk Grove Community Services District - Galt Fire Protection District Reorganization** (04-06) is exempt pursuant to Section 15320 (b) of the California Environmental Quality Act.
2. Adopt the Municipal Services Review and Resolution Making Determinations.
3. Adopt the Resolution Making Determinations for the Reorganization of said proposal. The project consists of Dissolution of the Galt Fire Protection District and the Annexation of the territory consisting of said District to the Elk Grove Community Services District as the successor district.
4. Adopt the following Terms and Conditions for the Reorganization:
 - a. The Elk Grove Community Services District shall provide only fire protection services, rescue services, hazardous material emergency response services and ambulance services within the zone of the former Galt Fire Protection District.
 - b. The reorganized district shall be named:
THE COSUMNES COMMUNITY SERVICES DISTRICT
 - c. The Cosumnes Community Services District shall hold an election at the next general election to ask the electorate whether the Board of Directors of the Cosumnes Community Services District shall be elected by districts or at large.

- d. All assets, liabilities, agreements, contracts, memorandum of understandings etc., of the Galt Fire Protection District shall accrue to the successor district.
 - e. The effective date of the reorganization shall be upon recordation of the Certificate of Completion.
 - f. The Board of Directors of the Elk Grove Community Services District shall serve as the Board of Directors of the successor district.
 - g. Upon the effective date of the reorganization, the Board of Directors of the Galt Fire Protection District shall be designated and serve as the Galt Advisory District of the successor district representing the interests in the Galt Fire Protection Zone.
5. Designate the Executive Officer to hold the Conducting Authority Hearing within the timeframes and process authorized by statutes.

Project Applicants

Elk Grove Community Services District
(Park, Fire and Emergency Medical services.)

Galt Fire Protection District
(Fire Protection and Emergency Medical Services.)

Project Description

The Elk Grove Community Services District will annex the territory comprising the Galt Fire Protection District; the Galt Fire Protection District shall be dissolved. The Elk Grove Community Services District shall be renamed the *Cosumnes Community Services District*. As successor district, the Cosumnes Services District shall assume all assets and liabilities of the Galt Fire Protection District. All agreements, contracts, memorandum of understandings etc., shall be transferred to the successor district.

Both districts have entered into substantially similar Resolutions Making Application pursuant to Government Code Section 56583.

Project Location

Both the Elk Grove CSD and the Galt Fire District are located in the southern portion of Sacramento County. Their boundaries are coterminous along the Cosumnes River and along Twin Cities Road.

The Elk Grove CSD is generally bounded by Calvine Road and the City of Sacramento on the north, by the Cosumnes River on the east, by I-5 on the west, and by Twin Cities Road on the south. The Elk Grove CSD provides park and fire services to the territory within its district boundary. The City of Elk Grove is located within the boundaries of the Elk Grove CSD. The City of Elk Grove does not have a fire department. (During the incorporation of Elk Grove, the issue of whether or not the EGCSO should continue to provide fire and park service was extensively discussed and debated. The incorporation proceeded with the continuation of all services provided by special districts. Currently, the EGCSO and City of Elk Grove are in litigation to determine if the city has the authority to provide supplemental park services).

The Galt Fire Protection District is generally bounded by Arno Road on the north, by Cherokee Lane on the east, by Franklin Boulevard on the west, and by Dry Creek and the Sacramento County Line on the south. The City of Galt is located within the boundaries of the Galt Fire Protection District. The City of Galt does not have a fire department.

Project Information

<u>Description</u>	<u>Elk Grove CSD</u>	<u>Galt Fire District</u>
Services Provided	Park and Fire	Fire
Population	136,000	33,100
Area Served	106 Square Miles	56 Square Miles
Governing Body	5 Member Board Elected at Large	5 Member Board Elected at Large
Fire Stations	6	2
Planned	3	
Proposed	2	
2005/06 Assessed Valuation	\$12,781,065,161	\$1,653,475,021.
2006/06 Fire Budget	\$33.5 M	\$4.9 M
2005/06 Reserves	\$19 M	\$138,000
2005/06 per Capita Expenditure	\$246.67	\$148.25
FTE	141	34
Registered Voters	62,118	10,859

LAFCo Process and Procedures

The commission has the option to continue this hearing for up to 70 days. Government Code Section 56666 (a) Allows the Commission to continue hearings from time to time but not to exceed 70 days. (b) At the hearing, the Commission shall hear and receive any oral and written protests, objections, or evidence which may be made, presented, or filed, and consider the report of the Executive Officer and plan for providing service.

Reorganization Proposals Made Pursuant to Government Code Section 56853

Pursuant to Government Code Section 56853, because the Board of Directors of each District proposing Reorganization adopted substantially similar resolutions of application for proceedings before your Commission, your Commission does not have the discretion to amend, modify, or deny this proposal. *Your Commission must, by statute, approve the proposal. However, your Commission may impose terms and conditions to mitigate issues that have been raised. Also your Commission may continue the matter up to 70 days as provided in Government Code Section 56666 (a).*

Government Code Section 56853 provides the following:

If a majority of the members of each of the legislative bodies of two or more local agencies adopt substantially similar resolutions of application making proposals either for the consolidation of districts or for the reorganization of all or any part of the districts into a single local agency, the commission shall approve, or conditionally approve, the proposal. The commission shall order the consolidation or reorganization without an election, except as otherwise provided in subdivision (b) of Section 57081.

Thus, under this provision, your Commission may neither amend, modify nor deny the proposed Reorganization.

This statute has been used for all previous fire district reorganizations, resulting in the formation of the Sacramento Metropolitan Fire District. Most of the fire district reorganizations in Sacramento County going back to the early 1980's have been contentious for a variety of reasons: community identity, governance, and labor and management issues. This statute has been used both in Sacramento County and throughout the State to further improve organizations and streamline local governments.

Under reorganizations pursuant to Government Code Section 56853 your Commission must ultimately approve the reorganization with or without conditions. I believe that only the legislative bodies that initiated the application could terminate the proceedings if one or both submitted resolution(s) rescinding the original application. Also, it would require both districts to adopt similar resolutions to amend the application.

The legislative bodies have been elected by their constituents to make both public policy and management decisions for the districts they represent. Thus, they have both the legal and fiduciary responsibility to act on behalf of the residents they represent.

Protest Provisions Pursuant to Government Code Section 57081

The proposed reorganization is subject to a “protest”/“conducting authority” hearing. The Cortese Knox Hertzberg Act provides that registered voters may sign a petition that requires an election be held on the proposed reorganization. The basic provision of the statute states that LAFCo must call an election if 25 percent or more of the registered voters sign a petition opposing the reorganization. Protest submitted and not withdrawn during the Conducting Authority proceedings will be verified by the Registrar of Voters. If sufficient protest is submitted, LAFCo will order the affected agency to call an election. If protest greater than 50 percent is submitted, the proposed reorganization is terminated. A substantially similar proposal cannot be proposed for a period of one year.

The protest would need to come from the area that is being annexed i.e., the Galt Fire Protection District boundary, the affected territory.

Background and History

This reorganization proposal comes before your Commission after an extensive, open, and deliberative process. The proposal was initiated over one year ago. In August, 2005, the Galt Fire Protection District approached the Elk Grove CSD about the possibility of forming a joint powers authority for training services. Preliminary review indicated that a joint training program was not a cost-effective proposal. However, discussion concerning how fire and emergency services might best be provided within the boundaries of each district continued with a Fire Reorganization Feasibility Study Group.

The Districts conducted internal review studies on the advantages and disadvantages of consolidation or reorganization of fire and emergency services. The Elk Grove CSD engaged Zamarripa Consulting to prepare a Municipal Services Review to identify issues and impacts related to the reorganization of these two districts.

The findings of the Municipal Service Review were presented to the Fire Reorganization Feasibility Study Group. The representatives included members from the Elk Grove CSD and the Galt Fire Protection District, Fire Fighters Local Union 522, and representatives from the Galt City Council. Public meetings were conducted on May 11, 2006, and May 30, 2006. On May 30, 2006, the Study Group unanimously voted to recommend that the Board of each district adopt a Resolution Making Application for the Reorganization of the Elk Grove Community Services District and the Galt Fire Protection District.

On June 5, 2006, the Elk Grove CSD held a special workshop. On June 20, 2006, the Board of Directors unanimously adopted a Resolution Making Application for Reorganization.

On June 28, 2006, the Galt Fire Protection District Board of Directors unanimously adopted a Resolution Making Application for Reorganization.

ANALYSIS

Fire Service in Sacramento County

Currently, Sacramento County has very good fire and emergency service coverage. There are basically three fire providers located north of Calvine Road: City of Sacramento Fire Department, City of Folsom Fire Department, and Sacramento Metropolitan Fire Department. There are nine districts south of Calvine Road: Elk Grove CSD, Wilton Fire Protection District, Herald Fire Protection District, Galt Fire Protection District, Walnut Grove FPD, Courtland FPD, River Delta FPD, and City of Isleton Fire Department. Sacramento Metropolitan Fire District extends to Rancho Murieta.

With the exception of Elk Grove CSD and Galt FPD, the remaining fire districts serve rural areas and are predominately volunteer organizations. The proposed reorganization of Elk Grove CSD and Galt Fire Protection District could trigger reorganizations similar to what occurred in the northern portion of Sacramento County. Thus, this has the potential to improve the fire and emergency delivery system for the southern portions of Sacramento County.

Zones of Benefit

Special Districts are authorized by statute to create service zones or zones of benefit within their District boundary. LAFCo has no authority over this process, i.e., it is completely the purview of the local agency to meet local needs and situations.

Boundary

The proposed boundary is definite and certain. It is contiguous along Twin Cities Road. It does not split parcels or created areas that are difficult to serve. Ultimately, the inclusion of Wilton, Herald, and Courtland would create the most logical service area.

Municipal Service Review

The attached Municipal Service Review (MSR) and addendum provides a very thorough and careful analysis of the proposed reorganization. It sets forth both the advantages and disadvantages of the proposed reorganization.

The proposed reorganization demonstrates that local governments can collaborate and cooperate for the benefit of the citizens it serves.

The critical public policy issue of the proposed reorganization may be clouded or lost in the debate over governance structure.

The proposed reorganization should provide better service to the residents within the Galt Fire Protection Zone without negatively impacting the residents currently served by the Elk Grove Community Services District.

The MSR has identified a projected shortfall of approximately \$384,000. Compared to the overall budget of the reorganized District this amount is relatively insignificant in light of the potential benefits to the Galt Fire Protection Zone. *In addition, the MSR Addendum addresses that the Galt Fund Balance will fund this deficit together with increased revenues from several sources.*

To date, the primary concerns that have been raised relate to the governance structure. I believe these concerns have been misdirected. The residents living within the Galt Fire Protection Zone are likely to have representation commensurate with the population of the district. *There is no evidence at this time to suggest that any Board member will even be elected from this area, although, prospective board members will have that opportunity beginning in 2008 if the reorganization is approved. Thus, all directors could continue to be elected from the current EGCSO boundary. Therefore, they would continue to have a vested interest in the park and recreation services as well as fire operations.*

As a result of this concern, I am recommending that the Commission impose a condition that requires the Board of the reorganized district ask the voters if elections should be held by division (district) or at large.

Benefits of the Proposed Reorganization

There are many benefits of the proposed reorganization. I believe the benefits far outweigh issues that have been raised.

The proposed reorganization is consistent with Cortese-Knox-Hertzberg Reorganization Act of 2000. The Legislature and Little Hoover Commission have encouraged the consolidation of Special Districts to provide more efficient services (Government Code Section 56100).

Sacramento LAFCo has encouraged reorganization of services over the last 30 years when it is in the best interest of the residents. Sacramento Regional County Sanitation District and Sacramento Metropolitan Fire District are examples that demonstrate the public benefits that result from such reorganizations.

Residents within the Galt Fire Protection Zone should have better service due to improved staffing levels together with administrative support services.

There will be no change in the mutual aid system among surrounding fire districts.

Recruitment and retention of firefighting personnel serving the Galt area should improve as salaries and benefits are equalized.

Staffing levels and training in the Galt Fire Stations will improve.

The Galt Fire Protection District Gann limit issue will no longer be a problem because it will be combined with the EGCSO Gann limit.

Impacts to Local Agencies

This reorganization does not create any negative impacts to the County of Sacramento, City of Sacramento, the City of Elk Grove, the City of Galt, or any other affected agencies or special districts within the territory to be reorganized.

Impacts to Residents

The service level of Elk Grove residents will continue to be at the same level as before the reorganization. The service levels for the Galt Fire Protection District should be enhanced. Residents in the successor district will continue to be represented by five elected Board members. The reorganized district will have two separate service zones. The Galt Fire Protection Zone will only receive fire and emergency services and the remainder of the District will receive both fire and park services as currently provided.

Sphere of Influence

The Sphere of Influence for each District is coterminous with the district boundaries of each district. No change in the Sphere of Influence is proposed for the successor district. The Sphere of Influence for the proposed Cosumnes Community Services District will be coterminous with the boundary of the reorganized district.

California Environmental Quality Act

The proposed reorganization is exempt from the California Environmental Quality Act pursuant to Section 15320 (b), reorganization or consolidation of two or more districts having identical powers with no change to the geographical area in which previously existing powers are exercised.

An exemption has been used to comply with CEQA for all previous fire district reorganizations as well. Thus, an exemption is consistent with all prior actions of similar nature.

Further, LAFCo sent letters of Early Consultation to both the City of Galt and the City of Elk Grove to determine if these agencies had any concerns or comments related to environmental issues. No responses were received by the requested deadline.

Property Tax Sharing Agreement

A property tax sharing agreement is not required for this proposal. The reorganized district will continue to receive the dedicated property tax from the predecessor districts.

Reorganized District Governance Structure

The Resolutions Making Application from both Districts provide that the existing Board of Directors of the Elk Grove Community Services District shall be the Board of Directors of the successor (reorganized) district. The EGCSO Board is a five member board elected at large. The Board of Directors of the Galt Fire Protection District shall serve as an Advisory Board to the Board of Directors.

City of Elk Grove Concerns and Issues

The City Council retained the consulting services of Dr. Robert Waste to analyze the proposed reorganization and Municipal Service Review. A copy of Dr. Waste's report is attached. On September 14, 2006, the City Council sent correspondence (attached) to LAFCo stating its concerns regarding governance of the reorganized district. The City summarizes its position as follows:

To summarize, the City of Elk Grove supports the merger of these fire and emergency services, but the accompanying fiscal and governance challenges must be addressed by Sacramento LAFCo in a comprehensive and structural manner for the proposal to be viable. Specifically, the City supports EGCSO fire department and Galt FPD reorganization as a single, stand-alone Fire Protection District, under Health and Safety Code, sections 13800, et. seq.

This structure allows the fire and emergency service and fiscal benefits of such a reorganization to be maximized for the residents of the combined area and allows for unified, logical representation for all of the residents. The parks and recreation functions create a fatal governance flaw if they remain in the merged entity. To be successful, the reorganization must include transfer of those functions to the municipal authority underlying the territory in question, i.e., the City of Galt, the City of Elk Grove and the County of Sacramento.

The City of Elk Grove respectfully requests that Sacramento LAFCo address these issues fully as part of its review of the proposal.

Based on the Robert Waste Report, the City of Elk Grove has taken the position that the reorganization proposal contains a "fatal flaw" that relates to the governance structure of the reorganized district. The City of Elk Grove believes the solution is to amend the proposal by transferring park and recreation services to the City of Elk Grove and adjacent (surrounding) County Service Areas. This analysis could be undertaken, but not as a part of or in conjunction with this pending application.

As previously discussed, the Cosumnes Community Services District will have a five member Board of Directors elected at large by residents within the reorganized district. The successor district will have two service zones. One zone will provide both park and fire services while the second zone will provide only fire and emergency medical services.

The City of Elk Grove states its concern as the possibility that one or more directors could be elected from the fire zone only. Thus, potentially such a director may not have a vested interest in the operation of park and recreation services. However, the same potential exists for directors to be elected exclusively from the recreation/park/fire zone. The successor District Board of Directors could be comprised of members elected exclusively from zone one or exclusively from zone two. Obviously, there are multiple possibilities of various combinations.

Your Commission is well versed in reorganization governance and representation issues. Similar issues have occurred with each of the individual reorganizations which ultimately produced the Sacramento Metropolitan Fire District, the merger that created Sacramento Suburban Water District, the formation of the Elk Grove Community Services District, the annexation of the City of West Sacramento to Sacramento Regional County Sanitation District, the Sacramento-Yolo Mosquito and Vector Control District, the restructuring to the Sacramento Yolo Port District as well as many other similar reorganizations. The issue was discussed and raised in the SMUD annexation proposal related to representation of Yolo residents.

The classic governance concern is usually raised by residents of small districts that are proposed to be annexed into larger districts. The residents of the small district go from a five member board of directors to one representative or no representatives from their community on the new board, nonetheless, all residents continue to have representation. While, annexations, reorganizations, and consolidations may dilute (lessen) representation, they do not lessen the accountability and responsibility of representative governance. Board members inherently represent a greater number of residents. The new board must act in a responsible manner representing the new service territory with differing degrees of service issues, with a greater number of constituents. This issue is very common and has been dealt with by most regional agencies including SACOG, Sacramento Regional County Sanitation District, Sacramento Transportation Authority, Regional Transit, etc. Most of the time, the governance structure issues have been very contentious and controversial, however, compromises have been reached.

The proposed reorganization is unique to previous reorganizations in Sacramento County because different service zones will exist. While this type of structure may not be common there is at least one example that is similar. The Dublin San Ramon Community Services District provides water and wastewater services to approximately 120,000 customers in Alameda and Contra Costa Counties. The Dublin San Ramon Services District serves the communities of Dublin, San Ramon, Pleasanton and Dougherty Valley. The District has a number of different service zones: Dougherty Valley receives

water service; San Ramon receives wastewater service; Dublin receives both water and wastewater service. The District has a five member Board elected at large. Currently, all five members reside in the same city.

I have spoken with the General Manager of this District about this governance structure issue. The District was created in 1950 as a community services district. It still functions as a community services district but it has gone through many changes. The two cities incorporated in the 1980's, and other various reorganizations have occurred that resulted in the district only providing water and waste water services as discussed above.

The common thread among elected directors/officials of all agencies is that they are elected to provide quality services to their constituents.

Another example could be El Dorado Irrigation District. This District provides water and waste water to several portions of El Dorado County. The directors are elected by district. However, within their districts they may represent residents receiving water only service, waste water only service, or both. The point is that elected officials have a number of different interests they must represent.

Governance issues and concerns are not unique to the proposed reorganization of Elk Grove CSD and Galt Fire District. Therefore, I do not concur with the City of Elk Grove's governance concern regarding a "fatal flaw." Although your Commission under this reorganization cannot mandate elections by district, the Commission has statutory authority to impose conditions on annexations, reorganizations and consolidations. *(Note: the CSD statutes trump Cortese Knox Hertzberg in this particular situation. The recently revised CSD statute allows representation by district, however, the community services district law requires that the district obtains voter approval authorizing the district to hold elections by division or district. Also, the CSD statutes do not allow for increased representation i.e., more than 5 elected Board members).*

Therefore, one option is to impose a condition that requires the successor district to hold an election in which the electorate determines whether the directors will be elected by district or at large. The Elk Grove CSD staff has submitted correspondence stating it will recommend that the successor district Board of Directors place this question on the ballot at the next general election, however, I recommend that the Commission impose this condition. If the electorate approves election by district, the successor district could create district boundaries so that each district would include a portion of the recreation and park service territory. Thus, all directors would have a vested interest in fire as well as recreation and park services.

Issues and Concerns Raised by the City of Galt

On August 24, 2006, the City of Galt City Council raised several issues related to the proposed reorganization. The following issues were set forth in their letter:

1. Governance. The City of Galt believes there would be benefits if the reorganized district Board were elected by districts to ensure representation for Galt.

LAFCo does not have the ability to mandate districts or impose a condition that requires districts based on current Community Services District law. Therefore, I am recommending that the Commission impose a condition that requires the reorganized district place a measure on the next election asking the registered voters if they want representation by district or at-large.

2. The City of Galt will continue to operate parks and recreation within the city.

The Resolution Making Application by Elk Grove Community Services District states that the reorganized district will not provide park and recreation services with the City of Galt.

3. The City collects a Fire Capital Improvement Fee from every building permit that is issued. In addition, the City of Galt imposed a Community Financing District (CFD) to support operations and maintenance costs of police and fire services within the City. The City requests that a written policy be developed to address the concerns raised by the City.

I have spoken with Curt Champion, City of Galt Planning Director on this issue. This issue currently exists, and it is not a result of this reorganization. The Galt Fire Protection District serves an area that is greater than the existing Galt city limits. Currently, the Galt Fire Protection District must get City Council approval to expend funds collected by the City. The reorganized District would be required to continue this practice for both the Capital Improvement Fund and the CFD.

4. An existing fire station is located on property owned by Galt's Park and Recreation Department, therefore, changes and expansion of fire operations need to be discussed and approved by the City of Galt.

The Galt Fire Protection District and the City of Galt currently have an agreement that addresses this concern. This agreement will transfer or be assigned to the reorganized District. The reorganized District is legally required to follow the terms and conditions of this agreement as the successor district.

5. Communication. The City wants to know how the reorganization will affect communication with the City's police services.

This is a current problem. The Galt Fire Protection District and the City of Galt do not use the same communication system. The City of Galt is not a member the Sacramento Regional Emergency Fire Communication Center. The reorganization may help resolve this issue. The reorganized district can implement temporary patches to resolve this

issue, however, the City of Galt needs to come to the table to update and/or upgrade their communication system so that they can operate at 800 MHz.

6. City of Galt raised the issue of adequate funding to operate the reorganized District.

The MSR indicates that there will be an operating deficit of about \$384,000 during the first several years. Initially, this deficit will be funded from Galt Fire Protection District reserves. It is anticipated that property tax will growth to make up this shortfall.

In conclusion, The City of Galt raised the issues discussed above; however, I believe that all of these issues with the exception of Number 6 are existing issues that have been addressed by the Galt Fire Protection District. LAFCo will condition the reorganization so that any agreements between the City and the Galt Fire Protection District will be transferred to the reorganized district.

These issues are discussed in further detail in the MSR Addendum.

On September 19, 2006 the Galt City Council voted 4 to 1 to support the proposed reorganization.

Opposition

There is no formal opposition to this proposal except the issues raised by the City of Elk Grove and Dyrice Ramirez, a citizen of the City of Elk Grove.

Future Special Studies or Applications: Role of the Reorganization Committee Government Code 56836-56849

Future special studies and/or applications are not precluded upon completion of this reorganization proposal. There are a number of options by which Reorganization proposals may be submitted to the Commission. This section will briefly describe those options and general procedures.

A change of organization or reorganization may be initiated by registered voter petition, resolution by a legislative body or by a Commission resolution initiating a proposed change of organization. Petition by registered voters and resolution of application by a legislative body are the most common methods of initiating a change of organization before Sacramento LAFCo. A request to authorize a study under the "Gotch" Provision would require authorization from the Commission. An application does not require such authorization. The Gotch Provision has not been used by many LAFCo's. The provision was adopted by the Legislature in the early 90's to encourage consolidation and reorganization of local governments.

The Commission has the discretion to create a Reorganization Committee to conduct special studies and/or study reorganization proposals. I believe a Reorganization

Committee could be used to conduct a special study to evaluate who should be the provider of park services within the City of Elk Grove. Prior to referring a proposal for reorganization to a Reorganization Committee, your Commission must hold a public hearing to direct staff to undertake such a study. **A Reorganization Committee is a relatively formal process that requires representation from the affected agencies and active participation by the Commission.**

This “Gotch” procedure may also be used pursuant to Government Code Section 56827 for either a petition initiated application or a resolution by a legislative body. ***However, it does not appear to be applicable to reorganizations made pursuant to Government Code Section 56853.***

Conclusion

The Commission does not have significant amount of discretion related to reorganization proposals made pursuant to Government Code Section 56583.

In summary I recommend the Commission

Approve the reorganization of Elk Grove Community Services District with the Galt Fire Protection District subject to the reorganized district placing a question on the ballot to ask the voters whether directors should be elected by division or at-large.

In addition, the Commission has the following options:

- 1. Subsequent to this proceeding, LAFCo could initiate proceedings to appoint a Reorganization Sub-Committee and direct staff to undertake a special study that would evaluate the provision of park services for the City of Elk Grove. (The Commission would have to approve additional funding to cover the cost of the study and consultants).***
- 2. Suggest to the City of Elk Grove that if they want to pursue assumption of park and recreation service, it should file an application to do so. (Such an application would be funded by the applicant).***

Respectfully Submitted

***PETER BRUNDAGE
Executive Officer
Sacramento LAFCo***

(Elk Grove-Galt Fire Reorg)