MENDOCINO Local Agency Formation Commission

Ukiah Valley Conference Center 0 200 South School Street 0 Ukiah, California 95482

ELK COUNTY WATER DISTRICT SPHERE OF INFLUENCE UPDATE

Prepared in accordance with Government Code §56425

Administrative Draft Workshop- August 3, 2015

Draft Hearing- September 14, 2015

October 5, 2015

November 2, 2015

Final Adoption- November 2, 2015

Table of Contents

INTRODUCTION	3
Overview	:
REVIEW PERIOD	
EVALUATION CONSIDERATIONS	
General Guidelines for Determining Spheres of Influence	
FIGURE 1	
OVERVIEW	б
Current Agency Operations	6
Background	£
Municipal Service Review	6
Sphere of Influence	e
DISADVANTAGED UNINCORPORATED COMMUNITIES	
CURRENT AND PROJECTED POPULATION	
Population and Growth	
Projected Growth and Development	
CAPACITY AND SERVICE	8
Infrastructure	
Water Supply	{
Relevant Local Agencies and Communities of Interest	
RELEVANT PLANNING AND SERVICE FACTORS	
County of Mendocino General Plan- Development Element (DE)	
DISCUSSION	10
ANALYSIS	11
Present and Planned Land Use	11
Present and Probable Need for Public Facilities and Services	11
Present Capacity of Facilities and Adequacy of Public Services	
Social and Economic Communities of Interest	
Present and Probable Need for Water, Sewer, or Fire Protection Services for Disadvantaged Unincorporated Communities (DUCs)	
RECOMMENDATIONS	
REFERENCES	
APPENDIX A	13
FIGURE 2. ELK AREA DISTRICTS MAP	13
FIGURE 3. LAND USE MAP	
FIGURE 4. SERVICES PROVIDED OUTSIDE OF THE DISTRICT.	15

INTRODUCTION

OVERVIEW

This update is prepared as part of a Cortese Knox Herzberg (CKH) Act mandated (GC §56076) process which states, "In order to carry out its purposes and responsibilities for planning and shaping the logical and orderly development and coordination of local government agencies so as to advantageously provide for the present and future needs of the county and its communities, LAFCo shall develop and determine the Sphere of Influence (SOI) of each local governmental agency within the county". A "SOI" under the CKH Act (GC §56076) definition is ".... a plan for the probable physical boundaries and service area of a local (government) agency".

Decisions on organizational changes must be consistent with the SOI boundary and determinations. The adopted SOI is used by LAFCo as a policy guide in its consideration of boundary change proposals affecting each city and special district in Mendocino County. Other agencies and individuals use adopted SOIs to better understand the services provided by each local agency and the geographic area in which those services will be available. Clear public understanding of the planned geographic availability of urban services is crucial to the preservation of agricultural land and discouraging urban sprawl.

The following update will assess and recommend establishment of an appropriate Elk County Water District (ECWD or District) Sphere of Influence (SOI). The objective is to establish ECWD's SOI relative to current legislative directives, local policies, and agency preferences in justifying whether to (a) change or (b) maintain the designation. The update draws on information from the ECWD's Municipal Services Review (MSR), which includes the evaluation of availability, adequacy, and capacity of services provided by the District.

REVIEW PERIOD

SOI reviews and updates typically occur every five years, or as needed. A local agency's services are analyzed with a twenty year planning horizon, and a sphere is determined in a manner emphasizing a probable need for services within the next 5-10 years. Actual boundary change approvals, however, are subject to separate analysis with particular emphasis on determining whether the timing of the proposed action is appropriate.

EVALUATION CONSIDERATIONS

When updating the SOI, the Commission considers and adopts written determinations:

Sphere Determinations: Mandatory Written Statements

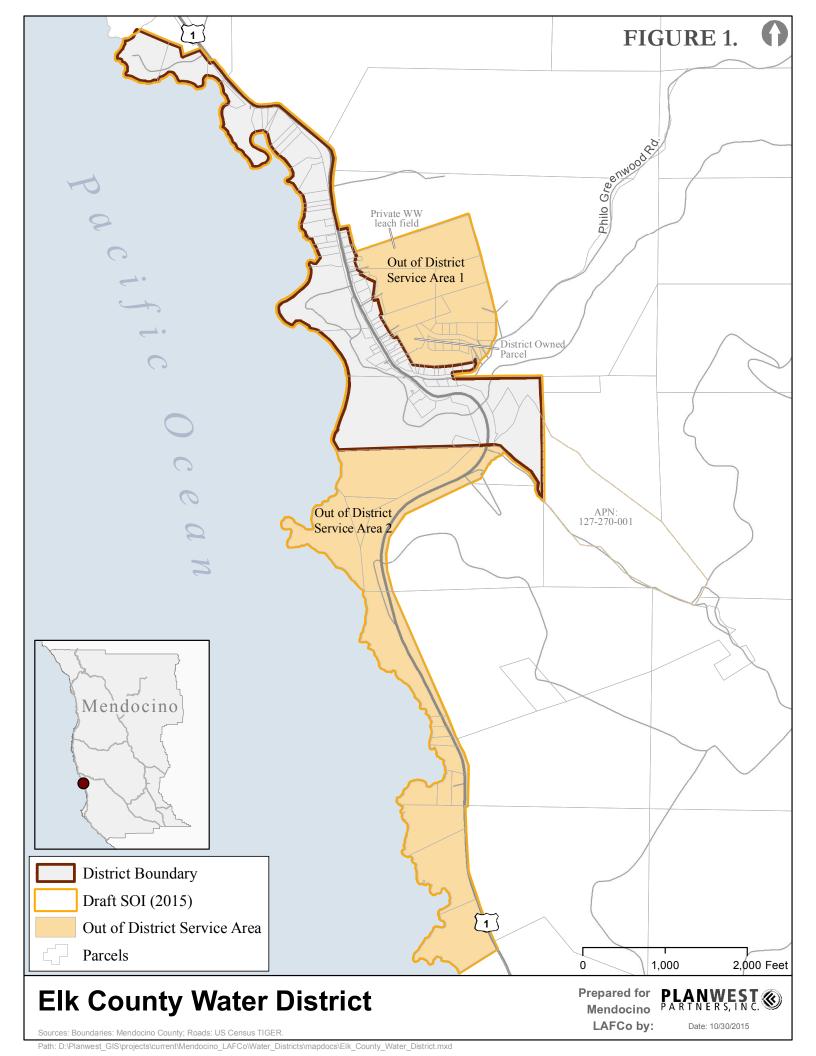
- 1. Present and planned land uses in the area, including agricultural and open space.
- 2. Present and probable need for public facilities and services in the area.
- 3. Present capacity of public facilities and adequacy of public services the agency provides or is authorized to provide.
- 4. Existence of any social or economic communities of interest in the area if the commission determines they are relevant to the agency.
- 5. If the city or district provides water, sewer, or fire, the present and probable need for those services of any disadvantaged unincorporated communities within the existing sphere.

Policies specific to Mendocino LAFCo are also considered along with determinations in administering the CKH Act in Mendocino County. This includes considering the merits of the SOI, or any changes, relative to the Commission's seven interrelated policies, as listed below, with respect to determining the appropriate SOI.

General Guidelines for Determining Spheres of Influence

The following is excerpted from *Mendocino LAFCo's 2004 Policies and Procedures*, "Chapter 5: Policies That May Apply for Some Applicants".

- 1. Territory that is currently receiving services from a local agency shall be considered for inclusion within that agency's sphere. Territory that is projected to need services within the next 5-10 years may be considered for inclusion within an agency's sphere, depending on a number of factors required to be reviewed by LAFCo. Additional territory may be considered for inclusion if information is available that will enable the Commission to make determinations as required by Section 56425.
- 2. Territory will not be considered for inclusion within a city's sphere of influence unless the area is included within the city's general plan land use or annexation element.
- 3. A special district that provides services, which ultimately will be provided by another agency (e.g. mergers, consolidations) will be assigned a zero sphere.
- 4. When more than one agency can serve an area, agency service capabilities, costs for providing services, input from the affected community, and LAFCo's policies will be factors in determining a sphere boundary.
- 5. If additional information is necessary to determine a sphere boundary a partial sphere may be approved and a special study area may be designated.
- 6. A local agency may be assigned a coterminous sphere with its existing boundaries if:
 - There is no anticipated need for the agency's services outside its existing boundaries.
 - There is insufficient information to support inclusion of areas outside the agency's boundaries in a sphere of influence.
 - The agency does not have the service capacity, access to resources (e.g. water rights) or financial ability to serve an area outside its boundaries.
 - The agency's boundaries are contiguous with the boundaries of other agencies providing similar services.
 - The agency's boundaries are contiguous with the sphere of influence boundaries previously assigned to another agency providing similar services.
 - The agency requests that their sphere of influence be coterminous with their boundaries.
- 7. If territory within the proposed sphere boundary of a local agency does not need all of the services of the agency, a service specific sphere of influence may be designated.



O VER VIE W

The Elk County Water District (ECWD/District) provides water services to the area within the ECWD as well as to areas outside of the District's boundaries. The Primary Service Area of this update is the same as the ECWD boundary. The District provides out-of-district water services to properties outside the District boundary; these properties will be considered as two separate Out of District Service Areas within this update (See Figure 1).

Out of District Service Area 1 is east of Highway 1 and includes the Community Center and Firehouse as well as a residential subdivision along Elk Meadows Road.

Out of District Service Area 2 consists of several parcels extending approximately 1.1 miles south of the ECWD boundary along Highway 1.

CURRENT AGENCY OPERATIONS

The ECWD provides water services including pumping, treatment, and distribution to 100 parcels and raw water to one parcel. ECWD also maintains a hydrant system, thereby providing fire flows for the local fire district. In addition, ECWD has surplus water agreements and supplies surplus water for export.

BACKGROUND

On April 22, 1957, the Mendocino County Board of Supervisors issued a "Statement of Creation" which formed the ECWD under the provisions of the California Water Code, Division 12, for the primary purpose of providing water service to customers in the unincorporated community of Elk in Mendocino County. At the time of formation, there was a boundary map contained in an "Exhibit A." However, Exhibit A was not provided to LAFCo, nor does LAFCo have archived records for ECWD. Neither LAFCo nor ECWD records show whether there have been any changes to the District boundaries since its original formation (MSR 2014). County staff developed a map using available GIS data for the county-wide Water and Wastewater MSR 2014, which shows the District's current boundary as shown in Figure 1.

The District encompasses the unincorporated community of Elk, located 15 miles south of the town of Mendocino along Highway 1, in the coastal zone. ECWD's boundaries encompass 0.2 square miles (127.7 acres). The community of Elk is the socioeconomic center of the District area and it includes a community center, Greenwood Elementary School, post office, two churches, a store, an art center, three restaurants, visitor center, several bed & breakfast inns, and residences (MSR 2014).

MUNICIPAL SERVICE REVIEW

In 2014, LAFCo prepared a county-wide Water and Wastewater MSR, which included the Elk County Water District. A Municipal Service Review is a part of and a prerequisite for a SOI Update; as such, much of the information contained herein comes directly from the 2014 Elk County Water District MSR.

SPHERE OF INFLUENCE

LAFCo and ECWD files do not contain any records of the establishment of a SOI for the District. Typically this means that the SOI is coterminous with the District boundary. ECWD provides water service to customers located outside the District boundary, but inside what the District considers to

be its "service area". ECWD notes the existing "service area" is adequate for addressing future needs (MSR 2014).

ECWD provides out-of-district service to an area east of Highway 1, including the Community Center and Firehouse as well as one residential subdivision along Elk Meadows Road. The District also serves several parcels extending approximately 1.1 miles south of the ECWD boundary along Highway 1. In addition, the water treatment plant (WTP) and an 84,000 gallon water storage tank are located outside and south of the District's boundaries. A 30,000-gallon water tank with pressure system is also located outside of and east of District boundaries (MSR 2014). The District infrastructure, though located outside of ECWD boundaries, is not considered when defining a SOI.

DISADVANTAGED UNINCORPORATED COMMUNITIES

LAFCo is required to evaluate disadvantaged unincorporated communities (DUCs) as part of this SOI review, including the location and characteristics of any such communities. A DUC is defined as any area with 12 or more registered voters where the median household income (MHI) is less than 80 percent of the statewide MHI. Within a DUC, three basic services are evaluated: water, sewer, and fire protection. The ECWD provides one of these services - water - and is therefore not responsible for assuring that the two other services are adequately provided to the community. Fire protection is provided by the Elk Community Services District. In addition, a private wastewater system, Li Foo, provides limited wastewater services in the area, primarily a collection line and leach field. All other parcels are served by onsite wastewater systems.

The Elk County Water District serves a portion of the community of Elk. However Elk is not a 'census designated place', therefore the median household income amount is not available. Even if the Elk community qualified as a DUC, there are no indications that water service from ECWD is substandard, or does not meet safe drinking water standards (MSR 2014).

CURRENT AND PROJECTED POPULATION

Population and Growth

The District defines a customer as a "parcel" that is served by the water system. Based on the MSR, the ECWD serves approximately 68 residential dwelling units within the District's boundary. Based on the County average of 2.46 persons per household, the estimated population within the Primary Service Area is 167 persons (MSR 2014). Although the District does not prepare service demand projections for the future, they have indicated that they see demand for water to be fairly steady over the next 20 years (MSR 2014).

Projected Growth and Development

Future population is related to growth and development subject to amount and type of developable land use. The lands within District's boundary subject to Mendocino County land use designations are Rural Village, Rural Residential, Open Space and Range Land. The non-urban designations of Open Space and Range Land will remain largely undeveloped and will not likely impact District demand or services. ECWD noted that the anticipated growth rate within the district is limited to six residential lots that could be developed as infill. These lots, when developed, could generate an additional 15 residents. Although the District does not prepare service demand projections for the future, they anticipate limited population growth (MSR 2014).

Land use designations within Out of District Service Area 1 are Rural Residential, Rural Village, Open Space, and Public Facility (see Figure 3 in Appendix A). Of the 13 parcels designated Rural Village, approximately 6 parcels are vacant and 7 parcels are developed with single family residences. In addition, there are a range of vacant and developed public uses (District owned property, PG&E owned property, and private wastewater facility) on land designated Remote Residential and Public Facility. The open space parcel included in this Area does not receive services and is incorporated to provide for a logical boundary.

Out of District Service Area 2 is subject to the Mendocino County land use designations of Rural Residential, Open Space and Rangeland (including residential properties along Highway 1), and non-urban uses on rangeland and open space parcels (See Figure 3 in Appendix A). The District provides water services to the residentially designated parcels, as well as to residential structures on the rangeland designated parcels (District General Manager, October 2015). Three parcels within this Area are reported as vacant, and nine developed with single family residences receiving water service (see Figure 4 in Appendix A).

CAPACITY AND SERVICE

Infrastructure

ECWD's community water system includes a water treatment plant, three wells (2 deactivated and 1 active), several miles of pipeline, and two water storage facilities (30,000 and 84,000 gallons). ECWD owns a parcel that houses a storage shed, community center, and volunteer fire station. It also maintains a hydrant system, providing fire flows for the local fire district. The active well requires continual maintenance and the District works to keep it flowing at an efficient capacity by cleaning and purging iron deposits which otherwise limit flow. The District identified pipelines as an infrastructure deficiency and pipe replacement is ongoing. Water is distributed by ECWD through several miles of pipeline from a water storage tank to customer homes (MSR 2014).

Water Supply

ECWD's water supply is obtained from a well adjacent to Greenwood Creek. Creek flows are rainfall dependent, which usually varies between 40 to 60 inches per year, primarily in the wet season between October and May. Portions of ECWD's service area are designated a Critical Water Resource area by the California Department of Water Resources in the 1982 Coastal Groundwater Study. The District does not have another source of water, other than the wells (1 & 4), and does not have any water supply purchase agreements to purchase water from other sources. ECWD submits monthly water reports to the California Department of Public Health (MSR 2014).

ECWD has water right permits from the Water Resources Control Board at Greenwood Creek for 41 gallons per minute (gpm) and Bonee Gulch for 13 gpm. ECWD pumped a total of 9 million gallons in 2009, 6.5 million gallons in 2010, and 11 million gallons in 2011 from the two original wells. In 2012 ECWD pumped 8.9 million gallons, which comes to approximately 123 gallons per day per capita¹. ECWD's plant capacity is about 42 gpm. Actual use is approximately 26 gpm, the average maximum. The community of Elk has limited projected growth, so demand is not expected to increase significantly in the coming years. ECWD does not have any outstanding "will serve"

¹ Average annual use of 8.9 million gallons divided 365 days/year and divided by 197 people

letters for new/proposed development, and does not have any plans to increase capacity (MSR 2014).

The District encourages water conservation through metering water and pricing. The ECWD system has sufficient capacity to serve existing connections and the treatment plant is in good condition. The District recently refurbished its water storage tank and replaced its water wells with one new well. In summary, ECWD's infrastructure is adequate to pump, treat and distribute of water for the next several years (MSR 2014).

Relevant Local Agencies and Communities of Interest

The ECWD works closely with local community groups and the Elk Community Services District (volunteer fire department) to facilitate positive interactions to best serve the needs of the small community of Elk and surrounding area (See Appendix A, "Elk Area Districts" figure). ECWD owns a parcel of land in Elk and shares this parcel with the Greenwood Community Center and the Volunteer Fire Department (MSR 2014). The Elk CSD provides fire protection to residents within the ECWD as well as to the surrounding community. A private wastewater system, Li Foo, provides limited wastewater services in the area, primarily a collection line and leach field. South of ECWD is the Irish Beach Water District, which provides water services and septic oversight within its current boundaries and to the surrounding community.

There are no areas within the District boundaries that might be more efficiently served by another agency. The District does not maintain any aid agreements with other agencies.

RELEVANT PLANNING AND SERVICE FACTORS

Local planning policies and land-use designations inform LAFCo SOI decisions. Below are relevant policies and service factors that are used as a guide.

County of Mendocino General Plan- Development Element (DE)

General Plan Water Supply and Sewer (Wastewater Treatment) Services Policies:

<u>Policy DE-186</u>: Coordinate community water and sewer services with General Plan land use densities and intensities.

<u>Policy DE-187</u>: The County supports efficient and adequate public water and sewer services through combined service agencies, shared facilities, or other inter-agency agreements.

Action Item DE-187.1: Work aggressively with water and sewer service providers to overcome current and projected system and supply deficiencies necessary to serve planned community growth.

Action Item DE-187.2: Support funding applications to improve and expand water and sewer service capabilities in areas planned for future growth or to resolve existing deficiencies.

Action Item DE-187.3: Work with communities and public water and sewer service entities to monitor, manage and/or maintain community-wide or decentralized water/sewer systems.

<u>Policy DE-188</u>: Encourage water and sewer service providers to incorporate water conservation, reclamation, and reuse.

o Encourage the development and use of innovative systems and technologies that promote water conservation, reclamation, and reuse.

- o Encourage the development of systems that capture and use methane emissions from their operation.
- o Encourage the development and use of innovative systems and technologies for the treatment of wastewater.
- <u>Policy DE-189</u>: Oppose extension of water or sewer services to rural non-community areas when such extensions are inconsistent with land use and resource objectives of the General Plan, except where the extension is needed to address a clear public health hazard.
- <u>Policy DE-190</u>: Development of residential, commercial, or industrial uses shall be supported by water supply and wastewater treatment systems adequate to serve the long-term needs of the intended density, intensity, and use.
- <u>Policy DE-191</u>: Land use plans and development shall minimize impacts to the quality or quantity of drinking water supplies.

DISCUSSION

Estimated growth within the Primary Service Area is negligible. Future growth of the community of Elk is expected to be limited to the "service areas" outside the District boundary. A property owner in Out of District Service Area 1 is considering filing a parcel map with the County (General Manager September 12 2015)

Within the Out of District Service Area 1, the majority of parcels are designated Rural Village and already receive water service from the ECWD. These existing service connections directly support current residential and community uses through previously established out-of-district service agreements, and will continue to need services into the future. Within the Area, there are several vacant parcels owned by PG&E which do not receive services; however, these parcels are designated Rural Residential and should be considered for inclusion within the SOI. In addition, there are two vacant parcels owned by a private wastewater provider, one of which has a water service connection and is currently used as a leach field. Given these parcels are also designated Rural Residential, they should be considered for inclusion in the District's SOI. Finally, there is a parcel which is designated Open Space (APN 127-232-028) that is owned by a homeowners association and should be considered for inclusion within the District to create a logical boundary. See Figure 4 in Appendix A for a complete overview of parcels and services provided.

Within Out of District Service Area 2, most of the parcels already receive water service from the ECWD. These existing service connections directly support current residential uses by way of previously established out-of-district service agreements, and will continue to need services into the future. Those parcels that are not receiving service should be considered for inclusion in the SOI to promote connectivity and logical boundaries. See Figure 4 in Appendix A for a complete overview of parcels and services provided.

In addition, the District has reported that it provides untreated water to a single parcel (APN 127-270-001) located external to both the District boundaries and the designated Out of District Service Areas. This property is reported within the MSR as the nursery receiving raw water (MSR 2014). The parcel shares ownership with another parcel located within the District boundaries (APN 127-250-016) that receives potable water service. According to the District, the out of district parcel receives raw water for agricultural purposes from a separate service connection (District Manager, October

2015). This parcel is the only parcel reported to receive raw water in the area. Pursuant to the CKH Act (GC §56133 (e)) contracts for the transfer of nontreated water are generally exempt from required LAFCo approval and are not necessarily considered for inclusion within spheres of influence. Given the type of water provided by the District and the parcel's resource-based landuse designation, this parcel should not be considered for inclusion within the District's SOI.

In summary, Elk CWD appears to have adequate capacity and facilities to continue to provide services to its present service base, including the Out of District Service Areas.

ANALYSIS

As presented in the introduction, when updating the SOI, the Commission considers and adopts written determinations. The following are the formal determinations for this SOI Update:

Present and Planned Land Use

The present and planned land uses within the Primary Service Area, Out of District Service Area 1, and Out of District Service Area 2 are consistent with the services provided.

Present and Probable Need for Public Facilities and Services

Future growth of the community of Elk is expected to be limited to the "service areas" outside the District boundary. Anticipated growth is restricted by current land use designations.

Present Capacity of Facilities and Adequacy of Public Services

ECWD has adequate water services to accommodate existing and probable demands within its current service area (including its out-of-district services to Out of District Service Areas 1 & 2) into the foreseeable future.

Social and Economic Communities of Interest

The ECWD serves properties outside the District boundary. These areas should be considered for inclusion within the District's SOI.

Present and Probable Need for Water, Sewer, or Fire Protection Services for Disadvantaged Unincorporated Communities (DUCs)

There are no DUCs that have been identified within the vicinity of Elk CWD that should be considered for service by the District.

CONCLUSIONS

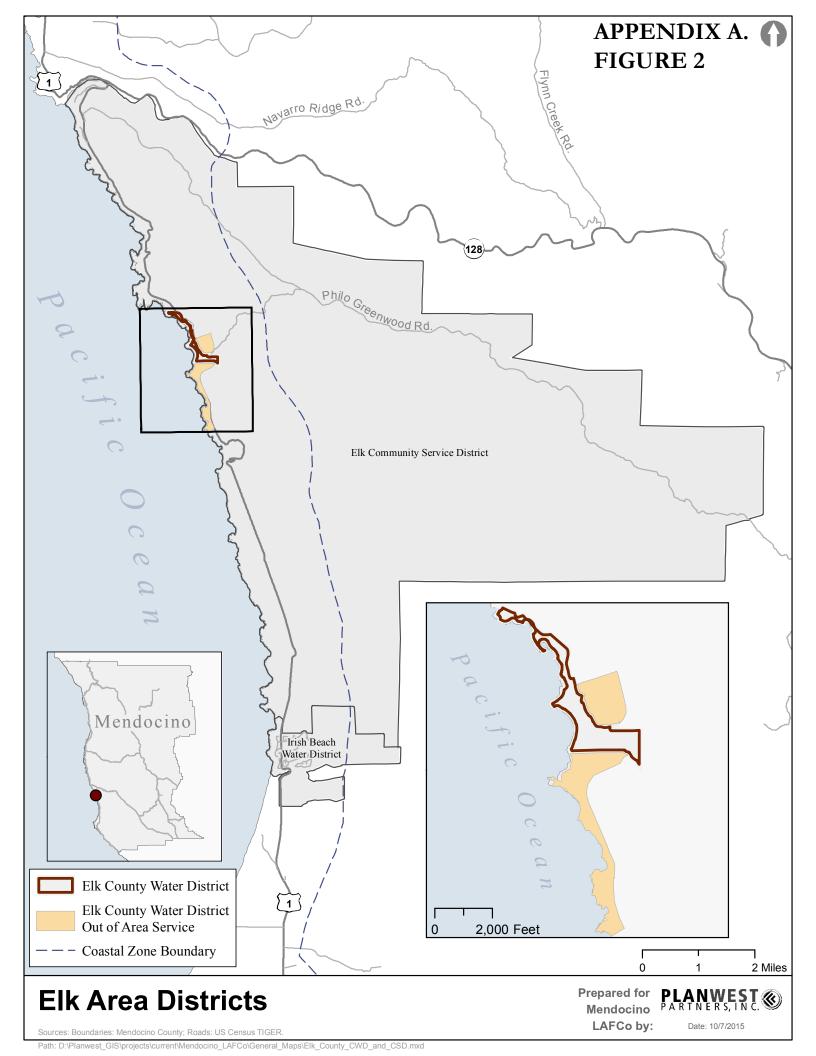
Based on Mendocino LAFCo's first of seven policies for determining an appropriate SOI:

"Territory that is currently receiving services from a local agency shall be considered for inclusion within that agency's sphere."

The Out of District Service Areas 1 & 2 should be included in the ECWD's SOI. There are no other lands adjacent to the District that are expected to need services within the next 5-10 years, and so no other lands that should be considered for adoption into the ECWD SOI.

REFERENCES

- Mendocino County. Mendocino County Coastal Element: Chapter 4 Land Use Plan: Descriptions and Policies for Thirteen Planning Areas: 4.9 Dark Gulch to Navarro River Planning Area (Albion Planning Area). Adopted by Mendocino County Board of Supervisors, November 5, 1985 (Revised -- March 28, 1988, February 13, 1989, January 22, 1990, July 9, 1990, March 11, 1991)
- (MSR, 2014) Mendocino LAFCo. "Mendocino Local Agency Formation Commission, Final Water and Wastewater Municipal Service Review: Caspar South Water District, Elk County Water District, Gualala Community Services District, Irish Beach Water District, Laytonville County Water District, Pacific Reefs Water District, Round Valley County Water District, Westport County Water District. October 2014." Prepared by: Kateri Harrison, SWALE, Inc.; Uma Hinman, Uma Hinman Consulting. Final approval October 6, 2014.
- Mendocino LAFCo, 2004 Policies and Procedures, Chapter 5- Policies That May Apply for Some Applicants, D. Sphere of Influence.



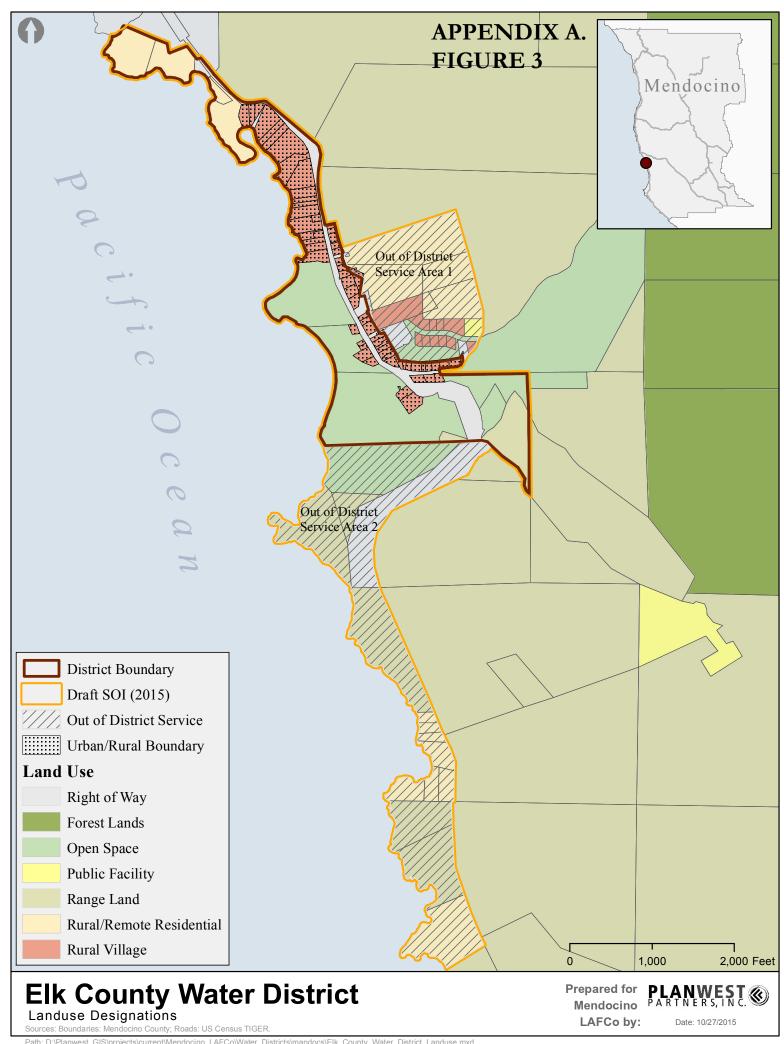


FIGURE 4. SERVICES PROVIDED OUTSIDE OF THE DISTRICT

Out of District Services Provided by Elk CWD ²							
APN	General Plan Designation	Current Land Use	Acreage	Service Type	Notes		
		Out of District Service	Area 1				
127-210-003	Remote Residential	Vacant Recreational Residence	13.6	water	Private Wastewater Provider (both parcels served as one)		
127-220-002	Remote Residential	Vacant Residential	4.6	not served	PG&E Owned		
127-232-020	Rural Village	Vacant Residential	0.4	water			
127-232-024	Rural Village	Vacant Residential	0.3	water			
127-231-006	Remote Residential	Vacant Residential	0.7	not served	PG&E Owned		
127-232-014	Rural Village	Single Family Residence	0.4	water			
127-220-003	Remote Residential	Vacant Residential	5.8	not served	PG&E Owned		
127-220-005	Remote Residential	Vacant Recreational Residence	7.7	water	Private Wastewater Provider (both parcels served as one)		
127-232-015	Rural Village	Single Family Residence	0.3	water			
127-232-019	Rural Village	Single Family Residence	0.4	water			
127-232-018	Rural Village	Vacant Residential	0.3	water			
127-232-016	Rural Village	Vacant Residential	1.0	water			
127-232-012	Public Facilities	PG&E facilities	1.1	not served	PG&E Owned		
127-232-017	Rural Village	Single Family Residence	0.3	water			
127-232-028	Remote Residential	Water District Facilities	1.9	water	Elk CWD Owned		
127-231-005	Rural Village	Single Family Residence	3.4	water			
127-232-027	Open Space	Vacant Recreational Residence	4.5	not served			
127-232-023	Rural Village	Vacant Residential	0.3	water			
127-232-022	Rural Village	Vacant Residential	0.3	water			
127-232-021	Rural Village	Single Family Residence	0.4	water			
127-232-025	Rural Village	Single Family Residence	0.3	water			
		Out of District Service	Area 2				
127-260-001	Rangeland	Recreational Residence	11.2	water	Same property owner as 127- 260-002		
127-280-001	Rangeland	Dry Classified Lands	14.3	water			

² Table information sourced form the Mendocino County GIS County Parcel layer, dated October, 2014 and Parcelquest via the Mendocino County Assessor's Office.

Out of District Services Provided by Elk CWD ²							
APN	General Plan Designation	Current Land Use	Acreage	Service Type	Notes		
127-260-002	Rangeland	Dry Recreational Residential	3.1	not served	Same property owner as 127 260-001		
131-010-002	Rangeland	Single Family Residence	9.9	water			
127-300-001	Rural Residential with Development Limits	Single Family Residence	0.6	water			
131-010-001	Rangeland	Recreational Residence	7.6	water			
127-300-004	Rural Residential with Development Limits	Single Family Residence	2.1	water			
127-240-002	Open Space	Recreational Residence	16.6	not served	California State Park		
127-300-002	Rural Residential with Development Limits	Single Family Residence	0.7	water			
127-300-003	Rural Residential with Development Limits	Single Family Residence	0.8	water			
127-300-008	Rural Residential with Development Limits	Vacant Residential	1.4	water			
127-300-009	Rural Residential with Development Limits	Vacant Residential	1.7	water			
127-300-005	Rural Residential with Development Limits	Vacant Residential	2.5	water			
131-010-003	Remote Residential	Single Family Residence	10.9	water			
127-100-0RW	None Specified	Public Right of Way	38.0	not served	Public Right of Way		
		Other					
127-270-001	Range Land	Recreational Residence	36.1	raw water	Same property owner as 127 250-016. Local nursery.		