



Tulare County

**Tulare County**

**LAFCO**

**GOSHEN COMMUNITY SERVICES DISTRICT**

**MUNICIPAL SERVICE REVIEW**

Prepared By  
Tulare County  
Local Agency Formation Commission  
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# **GOSHEN CSD MUNICIPAL SERVICE REVIEW**

## **EXECUTIVE SUMMARY**

This section provides an overview of the written determinations findings of the Goshen CSD Municipal Service Review. As part of its review of municipal services, LAFCO is required to prepare a written statement of its determination with respect to each of the following: 1) Growth and population, 2) Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs and deficiencies, 3) Financial ability to provide services, 4) Status of, and opportunities for, cost avoidance and shared facilities, 5) Accountability for community service needs, including government structure and operation efficiencies, 6) Any other matter related to effective or efficient service delivery, as required by Commission policy. This includes required determinations regarding disadvantaged unincorporated communities. These requirements are established by AB 2838, the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 and SB 244 (Wolk) in 2011.

## **GOSHEN COMMUNITY SERVICES DISTRICT**

### **Background**

The requirement for LAFCO to conduct reviews of local municipal services was established with the passage of AB 2838 known as the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. The bill passed the legislature, and was signed by Governor Davis on September 26, 2000. MSRs provide LAFCOs with an additional tool to fulfill their statutory responsibilities of promoting orderly growth and development, preserving the States finite open space and agricultural land resources, and working to ensure that high quality public services are provided to all Californians in the most efficient and effective manner. MSRs are a requirement of State law and are required to be completed before the consideration of a Sphere of Influence (SOI) update.

In July 2003 Tulare County LAFCO adopted a MSR exemption policy that identifies the agencies that would be subject to a review and the extent of that review. The agencies in Tulare County were divided into three (3) categories: agencies subject to a full comprehensive study; agencies subject to a questionnaire study; and agencies exempt from a MSR study. The Goshen Community Services District (CSD) is subject to a full comprehensive study. The policy further identifies that the services subject to review shall be:

- Police protection
- Fire protection
- Water and wastewater
- Solid waste collection and disposal
- Streets and traffic circulation
- Power generation and distribution
- Health care
- Mosquito abatement

Goshen, an unincorporated community in Tulare County, is located in the northwest portion of the County and northwest of the City of Visalia. The Goshen CSD which was formed in January 1958 has the authority to provide services for which CSD's are authorized. Sanitary sewer collection is the only active service provided by the Goshen CSD that is subject to a MSR. In the November 2004 elections voters within the Goshen District voted to expand the powers of the Goshen CSD to include park and recreation services. These services are not subject to a MSR.

Goshen is located approximately 1 ½ miles north of the Visalia Municipal Airport, portions of which are situated within the approach and departure area of the airport. It lies one tenth of a mile northwest of the City Limits of Visalia, 6 ½ miles from the downtown shopping area of Visalia, and immediately west of the Visalia Industrial Park. The community is bisected in a northwest-southeasterly direction by State Route (SR) 99 and the Union Pacific Railroad tracks, which divides the community into three approximately equal sized areas. Goshen is an agriculturally and industrially oriented service community surrounded on the north, west and south by lands in agricultural production and on the east by industrial land in the City of Visalia.

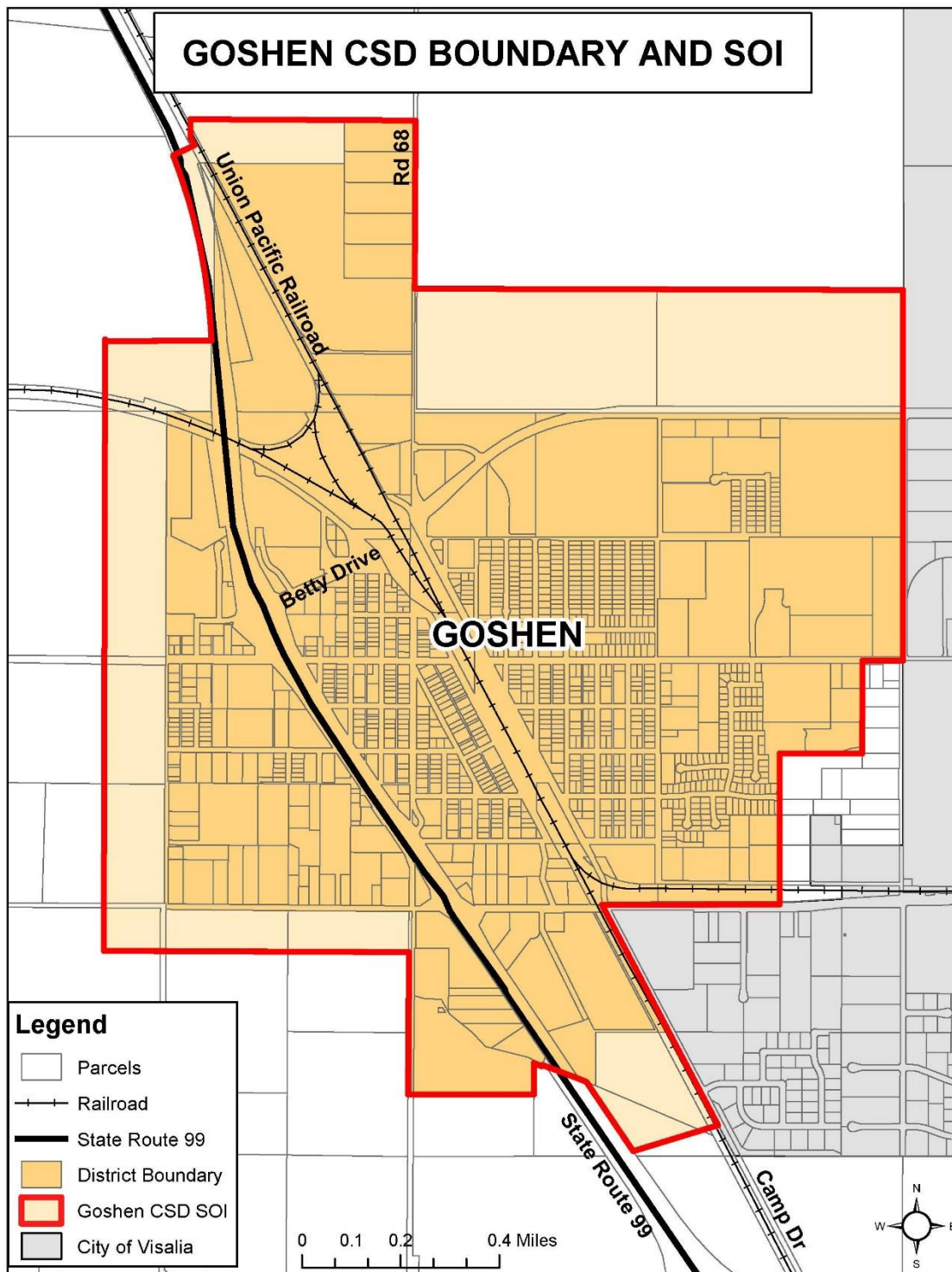
Cities and communities surrounding Goshen include Visalia to the east; Tulare to the south; the communities of London and Traver to the north and northwest, respectively; and the community of Tagus to the southeast (along SR 99 north of Tulare). The Tulare County/Kings County Line is located approximately 5 miles west of Goshen. The current District Boundary and the currently adopted SOI for Goshen are illustrated on Figure 1. The following excerpt from the Tulare County LAFCO website ([www.co.tulare.ca.us/lafco/info.asp](http://www.co.tulare.ca.us/lafco/info.asp)) defines a SOI and the purpose it serves.

*A “Sphere of Influence” is the physical boundary and service area that a local governmental agency is expected to serve. Establishment of this boundary is necessary to determine which governmental agencies can provide services in the most efficient way to the people and property in any given area. The Sphere of Influence requirement also works to discourage urban sprawl by preventing overlapping of jurisdictions and duplication of services.*

The District, was formed in 1958 as a community services district under the Community Services District Law, sections 61,000-61,934 of Government Code of the State of California.

The following discussions address the six legislative factors required by the Cortese-Knox-Hertzberg Act; 1) Growth and population, 2) Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs and deficiencies, 3) Financial ability to provide services, 4) Status of, and opportunities for, cost avoidance and shared facilities, 5) Accountability for community service needs, including government structure and operation efficiencies, 6) Any other matter related to effective or efficient service delivery, as required by Commission policy. This includes required determinations regarding disadvantaged unincorporated communities. These requirements are established by AB 2838, the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 and SB 244 (Wolk) in 2011.

**FIGURE 1 – GOSHEN CSD BOUNDARY AND SOI**



*Source: Tulare County LAFCO and Tulare County GIS Database (September 2018)*

## 1 GROWTH AND POPULATION

The purpose of this section is to present historical and projected growth patterns and population projections to establish a baseline for the evaluation of the service needs of Goshen.

### 1.1 Population Trends and Projections

The Census Bureau, on a decennial basis, identifies and provides detailed information on all incorporated Cities along with several smaller unincorporated communities (termed Census Designated Places – CDPs). In each Census, community profiles are developed and provide a wide range of information pertaining to population, demographics, housing information, household data, education and employment, income and poverty, and historical trends. The CDP Boundary for Goshen is generally (with minor exceptions) coterminous with the current District boundary. *Census 2010* data indicates that Goshen had a population of 3,006 as of January 2010.

*Census 2000* data indicates that Goshen had a population of 2,394 corresponding to an average annual growth rate between 2000 and 2010 of approximately 2.3%. Goshen wasn't included as a CDP in 1990 but it was included in 1980 when it had a population of 1,809. The average annual growth rate between 1980 and 2010 for Goshen was 1.7%. The *Goshen Community Plan Update* (Tulare County Planning Department, 2018) projects a population growth rate for the unincorporated portions of the county through 2030 of 1.3%, including Goshen. Using Tulare County's projected growth rate of 1.3%, Goshen would have a population of 4,316 in 2038 (the 20 year time horizon of the SOI).

Projected Population - 2038		
	Annual Growth Rate	Population in 2038
Historical Growth Rate	1.7%	4,829
Community Plan Projection	1.3%	4,316

Sources: US Census, California DOF and Tulare County Goshen Community Plan Update

### 1.2 Written Determinations

1. The Census Designated Place (CDP) Boundary for Goshen is generally (with minor exceptions) coterminous with the current District Boundary.
2. *Census 2010* data indicates that Goshen had a population of 3,006 as of January 2010.
3. The *Goshen Community Plan Update*, adopted in 2018, projected a 1.3% growth rate through 2030.
4. Between 1980 and 2010, Goshen experienced an average annual population growth rate of 1.7% per the US Census.
5. With an annual growth rate between 1.3% and 1.7%, the Goshen CSD could expect a year 2038 District population between 4,316 and 4,829.
6. The Tulare County RMA recently completed a comprehensive update to the *Goshen Community Plan* prepared to address the future needs of the community relating to growth, land use, housing, and public services.



## **2 PRESENT AND PLANNED CAPACITY OF PUBLIC FACILITIES AND ADEQUACY OF PUBLIC SERVICES, INCLUDING INFRASTRUCTURE NEEDS AND DEFICIENCIES**

The purpose of this section is to evaluate the infrastructure needs and deficiencies of a jurisdiction in terms of availability of resources, capacity to deliver services, condition of facilities, service quality, and levels of service. Of the municipal services subject to review, Goshen CSD is only responsible for a sewage collection system. Listed below are the agencies and companies responsible for the other municipal services.

Police protection – Tulare County  
Fire protection – Tulare County  
Water – California Water Service  
Solid waste collection and disposal – Mid Valley Disposal  
Streets and traffic circulation – Tulare County, Caltrans  
Power generation and distribution – Southern California Edison  
Health care – Kaweah Delta Health Care District  
Mosquito abatement – Delta Vector Control District

### **2.1 Sanitary Sewer Collection**

The Goshen CSD is responsible for the planning, construction, and maintenance of a sewage collection system. The main sewer system for the Goshen community is comprised of a collection system that was constructed in the late 1990s and placed in service in 1999. The construction of the District's sewer system was funded through a United States Department of Agriculture Rural Economic and Community Development Grant and a Small Community Grant. Pursuant to obtaining funding for the Goshen Sewer Project, the Goshen CSD entered into a Wastewater Service Agreement with the City of Visalia for treatment of the District's wastewater.

Connection from the District's sewer system to the City of Visalia's sewer system is through a 24-inch gravity sewer under Camp Drive. The 24-inch line connects to the existing City SR198-Airport lift station. The District constructed the 24-inch line as a part of the Goshen Sewer Project, although the line is part of the City's Master Planned Sewer System. After the line was placed in operation, the City assumed responsibility for maintenance of the line as a part of the City conveyance system. The City is responsible for improvements to its lift station and conveyance facilities downstream of the point of connection. The 24-inch line is planned to provide full capacity for the ultimate build-out of the Goshen CSD SOI. The District is responsible for the costs of construction and installation of any and all sewer line(s) from the District's collection system, and for any flow meters, automated sampling, or odor control devices. Other key issues identified in the Wastewater Service Agreement, between the Goshen CSD and the City of Visalia, are identified below.

- The District agrees to make a good faith effort to notify the City of any potential increases in effluent flow, biochemical oxygen demand, suspended solids and other potential pollutant levels indicated by any commercial and/or industrial development inquiries that would significantly affect the quantity and/or quality of the District's discharge to the City system as soon as such potential impacts are made known to the District.
- The City shall not contract, agree or otherwise create wastewater collection treatment and disposal service with any entity, corporation or individual which resides, does business within or requests service for any parcel, building, street or property within the boundary of the District.

- The Goshen Sewer Project included several 18-inch lines and the 24-inch line that are part of the City's Master Planned Sewer System. The City credited the District with the estimated cost of the lines as set forth in the City Master Plan.
- The City has identified areas of the City that sewer services may be provided by connection to the District facilities. The District agrees to consider such connections on a case by case basis. Such requests by the City shall be submitted in writing and shall indicate the point of proposed connection and the anticipated flows and pollutant loadings. Approval of such connections shall be at the sole discretion and decision of the District. The City shall make no connections to the District facilities without the prior written approval of the District.
- The District shall have the right to an amount of reclaimed water not to exceed the yearly total flow the District conveys to the City for treatment and disposal. The District shall be entitled to the reclaimed water without payment to the City other than the pro-rata share of the expense of transmission facilities and related operation and maintenance costs of the City facilities used to convey the reclaimed water. The District shall be responsible for the cost of the connection to the City reclaimed water system and conveyance facilities from the City system to the District point of use.

The District's wastewater collection system dumps into a lift station (owned and operated by the District) near the intersection of Avenue 305 and Effie Drive, which in turn pumps the wastewater into the 24-inch line in Camp Drive. The sewer lift station operates with two pumps, and has a design capacity of 500,000 gallons per day (GPD). The District system consists of the sewer collection system, a pump station to lift the collected wastewater to an outfall line to the City of Visalia collection system. Wastewater treatment and disposal is provided by the City of Visalia in accordance with an agreement with the City.

The collection system is comprised of approximately fifteen miles of PVC sewers ranging in size from six to eighteen inch diameter. The community is split into three district areas. State Route 99 runs between the west and central areas. The Union Pacific Railroad runs between the central and east areas. The single pump station is located in the central area near the south end of the service area. The west area is connected to the pump stations by a fifteen inch line under State Route 99, the east area is connected by an eighteen inch line under the Union Pacific Railroad (see Figure 2).

The pump station structure is thirty feet deep. It is constructed of eight foot diameter rubber gasketed concrete pipe on a poured concrete base. It is equipped with two fifteen horsepower submersible pumps. One pump is the in-service pump; the second pump is on standby. The pumps are controlled to alternate as the "lead" and "standby" units to equalize wear.

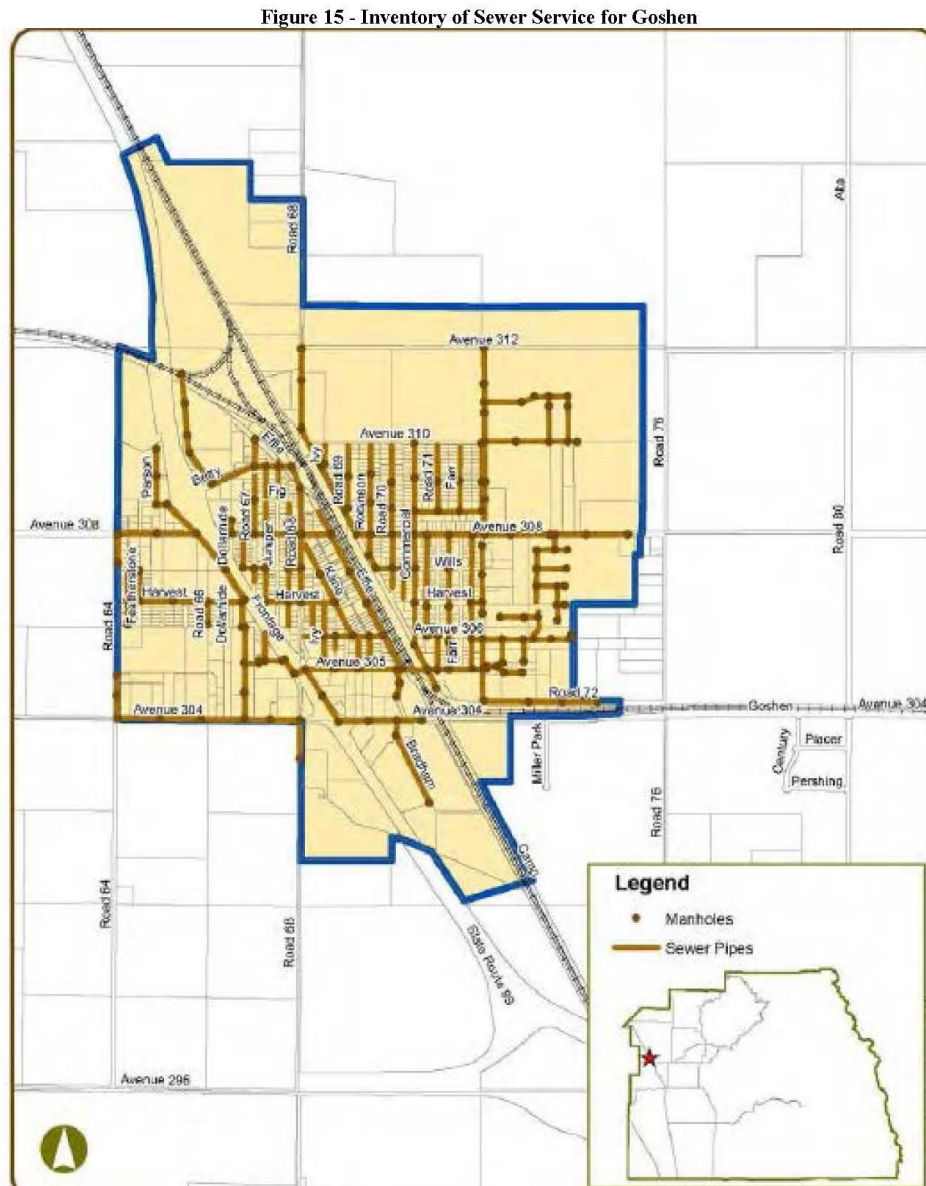
The station is equipped with a diesel powered generator and automatic electrical switchgear, to provide power to the pumps in the event of a failure of the electrical power. The System Control and Data Acquisition system provides control of the pump station and standby generator as well as logging the data into the computer at the District office. The pump discharge through a meter/valve vault to a 884 foot eight inch force main. The force main discharges to a 6,110 foot 24 inch outfall line to the Visalia system.

The District contributes an average daily flow of approximately 250,000 gallons per day of raw sewage to the wastewater treatment plant maintained and operated by the City of Visalia in 2018. Service data provided by the Goshen CSD included the following information:

- Current (2018) Demands: 250,000 gallons per day
- Current Facility Capacity: Estimated 500,000 gallons per day

**Figure 2 – Inventory of Sewer Service for Goshen**  
Source: Figure 15 - Goshen Community Plan Update

## Goshen Community Plan Update



Goshen Background Report

As of September 2018, the District was contributing an average daily flow of approximately 248,000 GPD of raw sewage to the City's WWTF. Assuming the District can accommodate up to 500,000 GPD based upon the limitations of the lift station, it can be concluded that the District's sewer system is operating at approximately 50% of its capacity. The District in recent years has accommodated demands of over 315,000 GPD. Those demands decreased after a single large industrial user closed.

The District maintains a Sewer System Management Plan (SSMP). The goal of the SSMP is to provide a plan and schedule to properly manage, operate, and maintain all parts of the sanitary sewer system. The plan helps reduce and prevent sewer system overflows and reduce the impacts of overflows that do occur through its overflow emergency response plan. In order to anticipate and correct any conditions requiring rehabiliitee or replacement the District maintains a program for cleaning and inspection of the system on a ten year cycle. The plan is reviewed yearly and amended as needed. The plan has been in place for approximately 10 years and the district is looking to comprehensively update the plan.

## **2.2 Written Determinations**

1. The main sewer system for the Goshen community is comprised of a collection system which was constructed in the late 1990s. The construction of the District's sewer system was funded through a United States Department of Agriculture, Rural Economic and Community Development Grant, and Small Community Grant.
2. Pursuant to obtaining funding for the Goshen Sewer Project, the Goshen CSD entered into a Wastewater Service Agreement with the City of Visalia for treatment of the District's wastewater.
3. The District's wastewater collection system dumps into a lift station (owned and operated by the District) near the intersection of Avenue 305 and Effie Drive, which in turn, pumps the wastewater into a 24-inch line in Camp Drive (that is owned and maintained by the City of Visalia). The sewer lift station operates with two pumps, and has a design capacity of 500,000 GPD.
4. As of September 2018, the District was contributing an average daily flow of approximately 248,000 GPD of raw sewage to the City's WWTF. Assuming the District can accommodate up to 500,000 GPD based upon the limitations of the lift station, it can be concluded that the District's sewer system is operating at approximately 50% of its capacity.
5. The District maintains a Sewer System Management Plan which guides the District to properly manage, operate, and maintain all parts of the sanitary sewer system. The plan also helps reduce and prevent sewer system overflows and reduce the impacts of overflows that do occur through its overflow emergency response plan.

### **3 FINANCIAL ABILITY TO PROVIDE SERVICES**

The purpose of this section is to evaluate the jurisdictions capability to finance needed improvements and services.

#### **3.1 Annual Budget**

The District prepares and adopts an annual budget for all of its funds on or before July 1<sup>st</sup> of each year

Based upon a review of the Goshen CSD budget for FY 2018-19 and the Audits, for 2015, 2016, and 2017, the District appears to be in sound financial condition. The fiscal year 2018-19 budget is well organized, thorough, and clearly articulates the District's financial plans for the upcoming year. The District prepares a typical line item budget that is divided into the following categories:

- Available Resources
- Estimated Revenues
- Appropriations
  - Salaries and Employee Benefits
  - Services and Supplies
  - Other Charges
  - Contingencies

The District adopts the budget each year and it is used as the spending plan for the District. The budget provides a framework for the District to address the following issues: reserves, revenues, expenditures, investments, and rates and fees.

For the fiscal year 2018-19 the district started with \$310,953 total beginning cash available. The total budgeted revenue is \$933,465. The budget for total salaries and employee benefits is \$159,100, total service and supplies is \$381,500 and total other charges is set for \$671,674. "Other charges" includes bond agent fees, repayment of long term debts and loans, treatment fees to the City of Visalia, pump maintenance, sewer line maintenance, inspect services, planned equipment replacement and other items. The District budgeted \$32,144 for contingencies.

Per the 2017 audit, the district had a total operating revenue of \$1,498,802 and total operating expenses of \$1,076,990. Total assets increased by approximately \$354,000 during the year due primarily to repayments from Caltrans' Betty Drive/SR 99 project.

\$3 million in revenue bonds were issued to construct a portion of the District's sewer construction project. The bonds are paid in installments over a 40-year period. For the fiscal year 2018-2019, the district is scheduled to pay \$92,430 in interest and \$68,000 in principal toward the bonds. As of June 30, 2017, \$2,187,000 in principal remained.

During the fiscal year that ended June 30, 2004, the District entered into a settlement agreement with a third party in the amount of \$97,000. The District was awarded a grant from USDA in the amount of \$21,750 and a loan in the amount of \$65,250 to fund the settlement. Yearly payments of \$3,484 began in May 2004 and are scheduled through May 2045.

Per the 2017 audit the District prepares its financial statements in conformity with accounting principles generally accepted in the United States of America (GAAP). All activities of the District are accounted for within a single proprietary (enterprise) fund. Proprietary funds are used to account for operations that are (a) financed and operated in a manner similar to private business enterprises where the intent of the

governing body is that the cost of providing goods or services to the general public on a continuing basis be financed or recovered primarily through user charges; or (b) where the governing body has decided that periodic determination of revenues earned, expenses incurred, and/or net income is appropriate for capital maintenance, public policy management control, accountability or other purposes.

The District's financial constraints involve the governmental structure and the desires of the people in the community to fund certain activities by establishing assessment districts or fees. The laws under which a Community Service District is governed provide the structure for funding activities. Key revenue sources for the Goshen CSD include property taxes, sewer service/connection fees, interest on reserves, and permit fees.

### **3.2 Written Determinations**

1. The District prepares a comprehensive and thorough annual budget that clearly describes the services provided to residents and the funds expended for those services.
2. The District prepares its financial statements in conformity with accounting principles general accepted in the United States of America (GAAP)
3. The District's budget for fiscal year 2018-19 included contingency funds of \$32,144. As of July 1, 2018 the District had a cash balance of \$2,785,000, of which \$2,475,000 was allocated equipment and system replacement reserves.
4. The District has two long term debts, and is making a good faith effort to repay its debt. The District is scheduled to pay \$160,430 towards its principal and interest bonds and \$3,484 toward its settlement loans in fiscal year 2018-19.
5. Based on available financial information, the District is financially sound.

## **4 STATUS OF, AND OPPORTUNITIES FOR, COST AVOIDANCE AND SHARED FACILITIES**

The purpose of this section is to identify practices or opportunities that may help to eliminate unnecessary costs and to evaluate opportunities for a jurisdiction to share facilities and resources, thereby increasing efficiency.

### **4.1 Cost Avoidance**

The District's budget process is designed to screen out unnecessary costs.

The District has adequate staff resources and administrative capabilities to provide the needed level of services to the residents within its boundaries. The District avoids unnecessary costs by contracting out professional services including engineering, inspection services, legal services, and other consulting services.

The District should continue to work with the development community to fund the construction of capital infrastructure improvements that would serve new development sites. The District requires development projects to pay connection fees, currently set at \$2,085 per equivalent dwelling unit (EDU) for residential users and \$2,380 per EDU for commercial users. This ensures that new development does not burden existing ratepayers.

### **4.2 Shared Facilities**

Since the location of the Goshen District Boundary is immediately adjacent to the existing City Limits of Visalia, opportunities for shared facilities and/or resources exist. Currently, the Goshen CSD contracts with the City of Visalia for wastewater treatment services, as the Goshen CSD does not own or operate an independent WWTF.

At present, there is a clear distinction between the sewer infrastructure of the District, and the sewer infrastructure of the City. As prescribed by the Wastewater Service Agreement between the City of Visalia and the Goshen CSD,

*“The City shall not contract, agree or otherwise create wastewater collection, treatment and disposal service with any entity, corporation or individual which resides, does business within or requests service for any parcel, building, street or property within the boundary of the District.”*

It is recommended that the District continue to coordinate with the City of Visalia with regard to sewer planning and related issues. To eliminate the potential for duplication of services, a clear distinction between District and City infrastructure and associated service areas should remain intact. The Wastewater Service Agreement between the District and the City outlines specific cases in which interagency coordination is necessary.

Since the Goshen sewer system is generally located in roads owned and maintained by Tulare County, it is recommended that the District work closely with the County on proposed sewer improvements that would impact County roadways and ensure that manhole locations are properly identified during pavement resurfacing activities.

### **4.3 Written Determinations**

#### *Cost Avoidance*

1. The District avoids unnecessary costs by contracting out professional services including engineering, inspection services, legal services, and other consulting services.
2. The District should continue to work with the development community to fund the construction of capital infrastructure improvements that would serve new development sites.

#### *Shared Facilities*

1. Currently, the Goshen CSD contracts with the City of Visalia for wastewater treatment services, as the Goshen CSD does not own or operate an independent WWTF.
2. At present, there is a clear distinction between the sewer infrastructure of the District, and the sewer infrastructure of the City. To eliminate the potential for duplication of services, a clear distinction between District and City infrastructure and associated service areas should remain intact.
3. The Wastewater Service Agreement between the District and the City outlines specific cases in which interagency coordination is to occur.
4. Since the Goshen sewer system is generally located in roads owned and maintained by Tulare County, the District should work closely with the County on proposed sewer improvements that would impact County roadways and County roadway improvements that would impact District sewer collection systems.



## 5 ACCOUNTABILITY FOR COMMUNITY SERVICE NEEDS, INCLUDING GOVERNMENT STRUCTURE AND OPERATIONAL EFFICIENCIES

The purpose of this section is to identify opportunities to positively impact rates without decreasing service levels, consider the advantages and disadvantages of various government structures to provide public services, consider the management structure of the jurisdiction and evaluate the accessibility and levels of public participation associated with the agency's decision-making processes.

### 5.1 Fee Structure

The Goshen CSD charges \$42 per equivalent dwelling unit (EDU) for residential service and \$50 for commercial uses. Residential connection fees are \$2,085 and commercial connection fees are \$2,380. The District also charges \$15 per property per month for availability of service for vacant lots. Table 1 shows a comparison of sewer rates, and connection fees for surrounding sewer service providers within Tulare County.

**TABLE 1  
COMPARISON OF SEWER RATES**

<b>Service Provider</b>	<b>Monthly Sewer User Fee (1 EDU)<sup>1</sup></b>	<b>Connection Fee<sup>1</sup></b>
<b>Goshen CSD</b>	<b>\$42.00</b>	<b>\$2,085</b>
Cutler PUD	\$33.40	\$3,520
City of Dinuba	26.63	N/A
Earlimart PUD	\$14.25	\$4,600
City of Exeter	\$20.91	\$729
Lemon Cove SD	\$25.00	\$500
City of Lindsay	\$36.00	\$950
Pixley PUD	\$36.55	\$5,028
Poplar CSD	\$25.00	\$5,450
Porter Vista PUD	\$13.25	\$6,191
Richgrove CSD	\$18.00	N/A
Springville PUD	\$58.97	\$5,000
Strathmore PUD	\$24.35	\$2,500
Tipton CSD	\$21.50	\$8,400
Woodville PUD	\$19.25	\$4,150
City of Tulare	\$43.60	\$200
Tulare County RMA – Delft Colony WWFT	\$51.00	\$500
Tulare County RMA – Tooleville WWFT	\$59.25	\$500
Tulare County RMA – TBSMD	\$42.00	\$500
Tulare County RMA – Traver WWFT	\$36.50	\$500
<b>Average</b>	<b>\$29.35</b>	<b>\$2,736</b>

1) Source: Wastewater User Charge Survey Report FY 2016-17)

As indicated in Table 1, the Goshen CSD charges one of the higher monthly rate for sewer service compared to other sewer service providers throughout the County. These districts having varying percentages of source of revenue for sewer service and provide varying levels of treatment (e.g. primary, secondary, tertiary) so cost comparisons across districts don't always match up equally. It can also be noted is that the Goshen CSD connection fee is below average compared to other sanitary sewer service providers throughout the County. User fees are used for the operation and maintenance costs of the Goshen CSD sewer system. Existing customers should not be responsible for costs associated with installing and/or upgrading infrastructure to serve new development.

The District last raised the connection fee in November 2017. The District should periodically review its monthly user and connection fees to ensure that quality service will continually be provided to existing and future residents. The Goshen CSD rates are currently amount the highest compared to surrounding service providers making it difficult to justify further rate increases. The District should review its connection fees to determine if they are adequate to support infrastructure required for new development, including future capacity purchases from the Visalia WWTP. Connection fees should generally be used for constructing new infrastructure and not for the operation and maintenance of existing infrastructure.

## **5.2 Government Structure**

One of the most critical elements of LAFCO's responsibilities is in setting logical service boundaries for communities based upon their capability to provide services to affected lands.

In 2005 the District completed a Conceptual Plan for Collection System Expansion. This plan included a detailed analysis and report on the capacity of the existing system and the needs to serve the ultimate project flows. The Conceptual Plan determined that the existing sewer collection system is adequate to serve project ultimate flows. The plan further established that the capacity of the existing pump station will have to be increased in two stages. The first stage would be to replace the existing pumps with larger pumps. The second stage would require even larger pumps and significant remodeling of the pump station and related piping and valve vault. This stage would also require construction of a new twelve inch force main. The District put a Capacity Expansion Fee on new development in place in 2005 in order to have the necessary funds available when the improvements are required. There is no schedule for the two stages of improvements to the pump station. The District should review the Conceptual Plan for Collection System Expansion completed in 2005 and determine if any updates are needed.

There are no foreseeable conditions that would indicate that development within the District's SOI would result in a change in government structure. There are, however, potential boundary conflicts with the City of Visalia that could affect the governmental structure of the Goshen CSD.

## **5.3 Evaluation of Management Efficiencies**

Based upon a review of information provided by the Goshen CSD, it appears that the provision of wastewater collection is managed in an efficient manner, meeting the needs of the community and ratepayers. The Goshen CSD has accounting and finance functions, current personnel regulations and resolutions. The District undergoes annual audits in compliance with auditing standards.

The Goshen CSD is governed by a five-member Board of Directors elected at large from within its boundaries that is responsible for setting policy and procedures. The District currently operates with four staff members (two office assistants, an office manager/secretary treasurer/clerk to the board and a stand by employee) and contracts out for other services, including engineering, legal counsel, accounting, and other consulting services. The District office is open Monday through Friday 8:00 a.m. – 5:00 p.m.

The District's answering message provides the public with the operational hours of the District in English and Spanish; however it does not provide contact information in case of emergencies. To make District personnel available to the public in case of emergencies, it is recommended that the District provide an emergency contact number on its answering message and on its website to more promptly and efficiently respond to emergency situations. It is recommended that the District be available to respond to emergency situations during non-office hours.

## **5.4 Local Accountability and Governance**

LAFCO may consider the agency's record of local accountability in its management of community affairs as a measure against the ability to provide adequate services to the SOI and annexation areas.

The Goshen CSD has a five member Board of Directors elected by voters residing within the Districts Boundary. All five District board seats are filled.

The board creates District policy by adopting resolutions and ordinances through duly-noticed public meetings. Regularly scheduled Board meetings, which are open to the public, are held on the fourth Thursday of each month at 6:00 p.m. except in November and December when they are usually held the third Thursday of the month at 6:00 p.m. at the District office located at 6678 Avenue 308 in Goshen. Agendas for Board meetings are posted on-site and on their website and notices provided consistent with public meeting requirements at least 72 hours before each meeting. Public hearing notices are published in the Visalia Times Delta and posted at the District office. District board meetings are open to the public and residents are invited to attend the month board meetings. Opportunity to address the District board on items not on the agenda is provided on each meeting agenda.

The district maintains a website that meets the requirements of SB 929 and SB 272. The District's website provides general district information, board of directors and staff contact information, board meeting times and location, recent budgets, audits, ordinances, permit applications, the Sewer System Management Plan, RFPs, and payment due dates. Agendas are posted to the website under the "DOC'S AND FORMS" tab. A direct link to the most recent agenda should be added to the home page.

The board members are familiar with the Brown Act and receive yearly training. The District is a member of the California Special Districts Association (CSDA) which can provide supporting resources to the board and district.

## **5.5 Written Determinations**

### *Fee Structure*

1. In October 2018, the Goshen CSD charges for sewer service are \$50 per EDU for commercial uses, and to \$42 per EDU for residential service.
2. The Goshen CSD monthly rates are currently among the highest compared to other service providers throughout the County making it difficult to justify further rate increases. The District's connection fee is below average compared to other sanitary sewer service providers in the County.
3. The District should periodically review its monthly user and connection fees to ensure that quality service will continually be provided to existing and future residents.

### *Government Structure*

1. The Goshen CSD has a Conceptual Plan for Collection System Expansion which includes a detailed analysis and report on the capacity of the existing system and the needs to serve the ultimate project flows. The Conceptual Plan determined that the existing sewer collection system is adequate to serve project ultimate flow. The District should review the Conceptual Plan for Collection System Expansion completed in 2005 and determine if any updates are needed.
2. Other than a potential boundary conflicts with the City of Visalia, there are no foreseeable conditions that would indicate that development within the District's SOI would result in a change in government structure.

### *Evaluation of Management Efficiencies*

1. Based upon information made available, it appears that the provision of sanitary sewer collection is managed in an efficient manner and meets the needs of the community and ratepayers.
2. The Goshen CSD is governed by a five member Board of Directors elected at large from within its boundaries and is responsible for setting policy and procedures.
3. The District currently operates with a combination of staff and contracts out for other services, including engineering, legal counsel, accounting, and other consulting services.
4. The District's answering message does not provide contact information in case of emergencies. To more promptly and efficiently respond to emergency situations, it is recommended that the District provide an emergency contact number on its answering message and its website.

### *Local Accountability and Governance*

1. The District complies with the Brown Act open meeting law by holding regularly scheduled meetings in which the public is invited. Regularly scheduled meetings are held on the fourth Thursday of each month at 6:00 p.m. at the District office, except for November and December when they are generally held on the third Thursday of the month. Agendas for Board meetings are posted on-site at the District office and on the District website at least 72 hours in advance.
2. The District maintains a website that meets the requirements of SB 929 and SB 272. Agendas, staff contact information, board meeting times and location, recent budgets, audits are available on the website. It is recommended that the District provide a direct link to the most recent agenda to the home page of its website.

## **6 ANY OTHER MATTER RELATED TO EFFECTIVE OR EFFICIENT SERVICE DELIVERY, AS REQUIRED BY COMMISSION POLICY**

The purpose of this section is to review issues relating to disadvantaged unincorporated communities and conflicting growth boundaries.

### **6.1 Disadvantaged and Other Developed Unincorporated Communities**

Pursuant to Government Code section 56430, municipal service reviews are required to identify the location and characteristics of any disadvantaged unincorporated communities within or contiguous to the sphere of influence and to also identify needs or deficiencies related to sewers, municipal and industrial water and structural fire protection. Government Code section 56033.5 defines a “disadvantaged unincorporated community” as inhabited territory, as defined by section 56046 (12 or more registered voters), or as determined by commission policy, that constitutes all or a portion of a disadvantaged community as defined by Water Code section 79505.5 (a community with an annual median household income that is less than 80 percent of the statewide annual median household income).

Tulare County LAFCO Policy C-5.7(C) defines a disadvantaged community as an area that has a median household income 80% or less of the statewide average pursuant to Public Resources Code section 75005(g) and contains at least 20 dwelling units at a density not less than one unit per acre.

In addition to what is required by GC §56430, Tulare County LAFCO Policy C-5.7(B)(VII)(a) requires that the Written Statement of Determinations for MSRs shall be based on a comprehensive review of area service providers conducted in accordance with GC §56430(b) and shall include, but is not limited to: estimate of existing population, identification of existing service providers, identification of services provided within the community, service costs and identification of surrounding land use designations, both existing and planned, contained in a city’s General Plan or County’s Community Plan for all (not just disadvantaged) unincorporated communities within or adjacent to the agency’s SOI. (Note: A reasonable effort shall be made to conduct a thorough review; however, the level of detail is subject to the extent data is readily available and relevant to the overall MSR analysis.)

Tulare County LAFCO identified the community of Goshen as part a list of disadvantaged unincorporated communities (DUCs) that was adopted into policy on 5/2/12. There are no other identified DUCs within or adjacent to Goshen CSD’s current or proposed SOI.

The Goshen Community Services District is responsible for a sewage collection system. Tulare County provides fire and police protection and California Water Service provides water.

### **6.2 Conflicting Growth Boundaries**

The Goshen CSD governmental structure could be affected by the potential overlapping of boundaries with the City of Visalia. The existing boundary conflict between the Goshen CSD Sphere of Influence (SOI) and the City of Visalia SOI is illustrated on Figure 3. The Goshen CSD has a Wastewater Service Agreement with the City of Visalia, which sets forth specific criteria with regard to wastewater collection and treatment services within the boundary of each agency. In April 2018 the Sphere of Influence for the City of Visalia was amended which eliminated a number of overlapping boundaries. One overlapping boundary with the City of Visalia still remains at the northern portion of the district is illustrated in Figure 3.

The area of conflict is approximately 83 acres. Also, approximately 44 acres of land were recently removed from the Visalia Sphere of Influence located near the southeast corner of the district that is currently located in neither the District’s nor the City’s Sphere of Influence. This area however remains within the City of

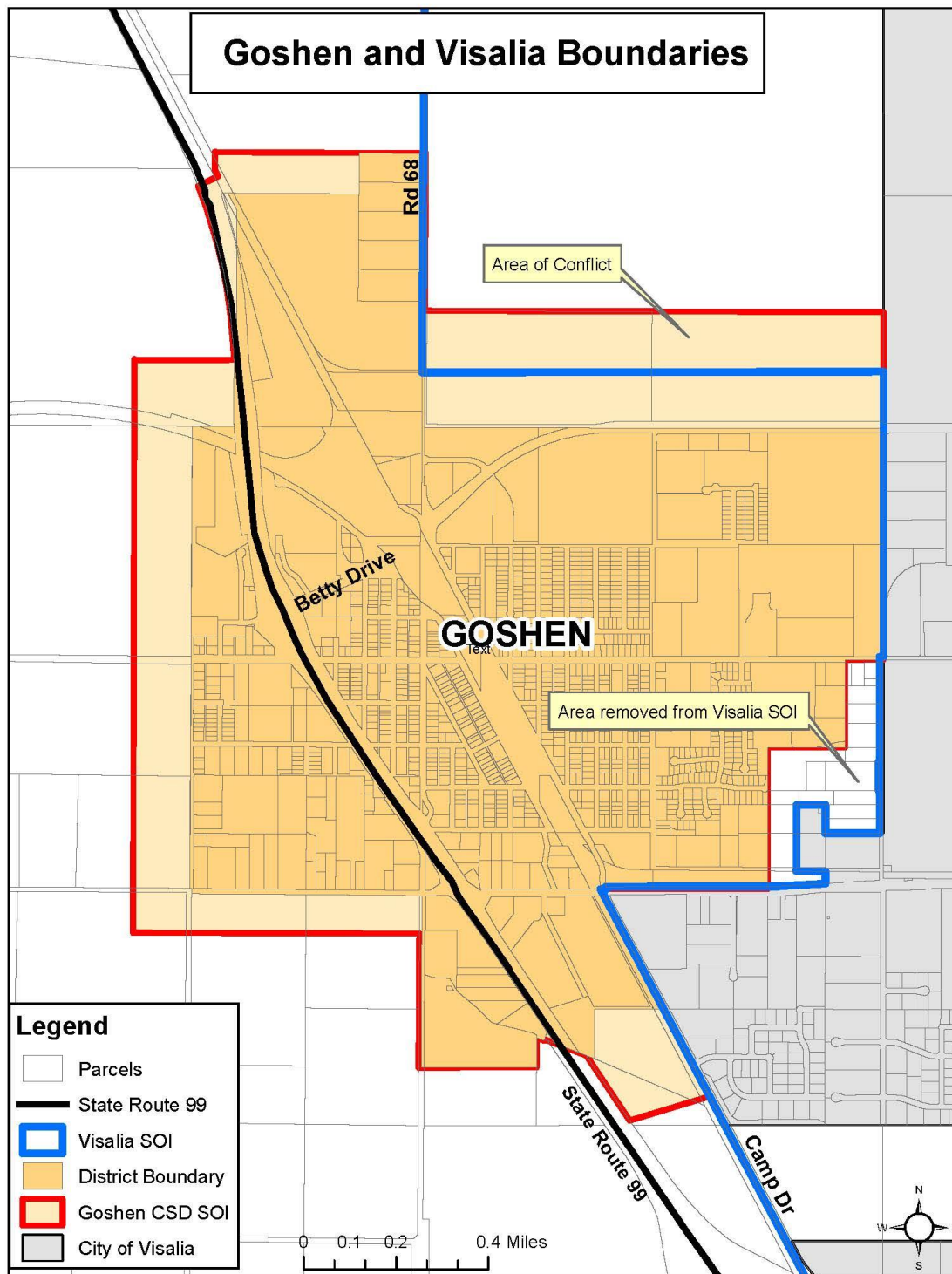
Visalia's Urban Development Boundary. If the northern area were removed from Goshen's Sphere of Influence, the southeast area could potentially be added to the District's Sphere of Influence, although issues of overlap would still exist between the Goshen SOI and the Visalia UDB though there would be no issues of overlap between the SOI's.

The Wastewater Service Agreement between the Goshen CSD and the City of Visalia, which may only be terminated upon the written consent of all parties, states the following with regard to sanitary sewer service within the Goshen CSD Boundary.

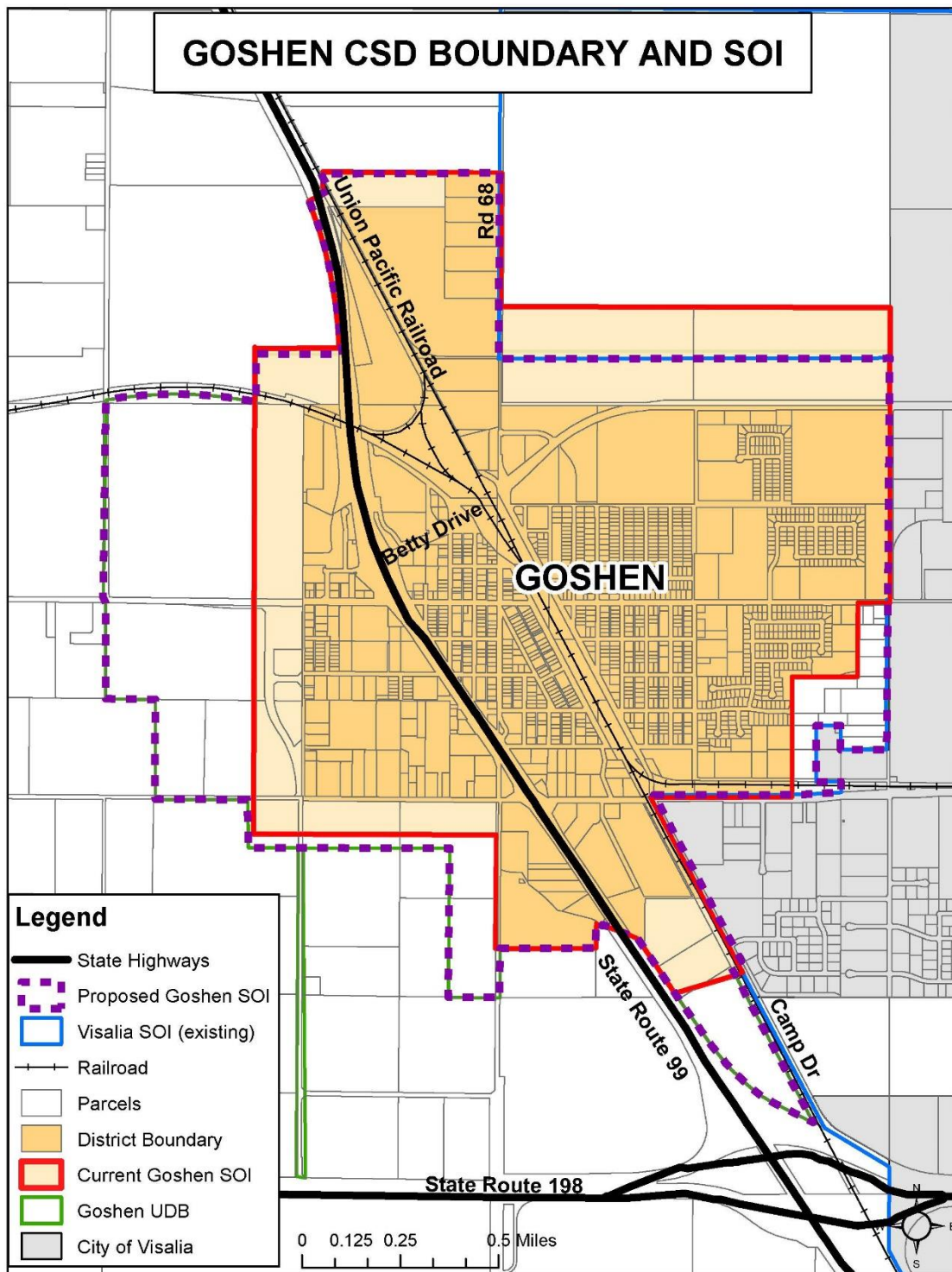
*"The City shall not contract, agree or otherwise create wastewater collection, treatment and disposal service with any entity, corporation or individual which resides, does business within or requests service of any parcel, building, street or property within the boundary of the District. The City shall not renew any current contract with any entity, corporation, industry or property for wastewater service within the District at expiration thereof."*

If a new Sphere of Influence boundary as shown in Figure 4 were adopted the final area of conflict between the Goshen CSD SOI and the City of Visalia SOI would be eliminated. The new Sphere of Influence boundary could closely follow the Goshen Urban Development Boundary with the exception of the right-of-way peninsula along Road 64.

**FIGURE 3 – CITY OF VISALIA & GOSHEN CSD BOUNDARY CONFLICTS**  
 Source: Tulare County GIS Database



**FIGURE 4 – GOSHEN COMMUNITY SERVICES DISTRICT BOUNDARY AND SPHERE OF INFLUENCE**  
 Source: Tulare County GIS Database





### **6.3 Written Determinations**

#### *Disadvantaged Unincorporated Communities*

1. Goshen is an identified disadvantaged unincorporated community and there are no other identified DUCs within or adjacent to the existing or proposed Goshen CSD SOI.
2. Residents inside the District boundaries receive sewage collection from the District. Tulare County provides fire and police protection and California Water Service provides water to district residents.

#### *Conflicting Growth Boundaries*

1. The governmental structure of the Goshen CSD could be affected by the potential overlapping of boundaries with the City of Visalia.
2. Many overlapping areas were resolved with the City of Visalia's 2018 updated Sphere of Influence amendment.
3. An area of overlap lies at the northern boundary of the Goshen Sphere of Influence with the Visalia Sphere of Influence consisting of approximately 83 acres.
4. The Goshen CSD has a Wastewater Service Agreement with the City of Visalia, which sets forth specific criteria with regard to wastewater collection and treatment services within the boundary of each agency.
5. Boundary conflicts and service provisions should ultimately be resolved between the City of Visalia, the Goshen CSD, Tulare County and Tulare County LAFCO.