

EL DORADO LAFCO

LOCAL AGENCY FORMATION COMMISSION

AGENDA OF JULY 22, 2020

REGULAR MEETING

TO: Shiva Frentzen, Chair, and
Members of the El Dorado County Local Agency Formation
Commission

FROM: José C. Henríquez, Executive Officer

PREPARED BY: Erica Sanchez, Assistant Executive Officer

AGENDA ITEM #6: AT&T / Bloxsom Annexation into the El Dorado County Fire
Protection District

LAFCO Project No. 2019-04

PROPONENTS: Jason and Jennifer Bloxsom

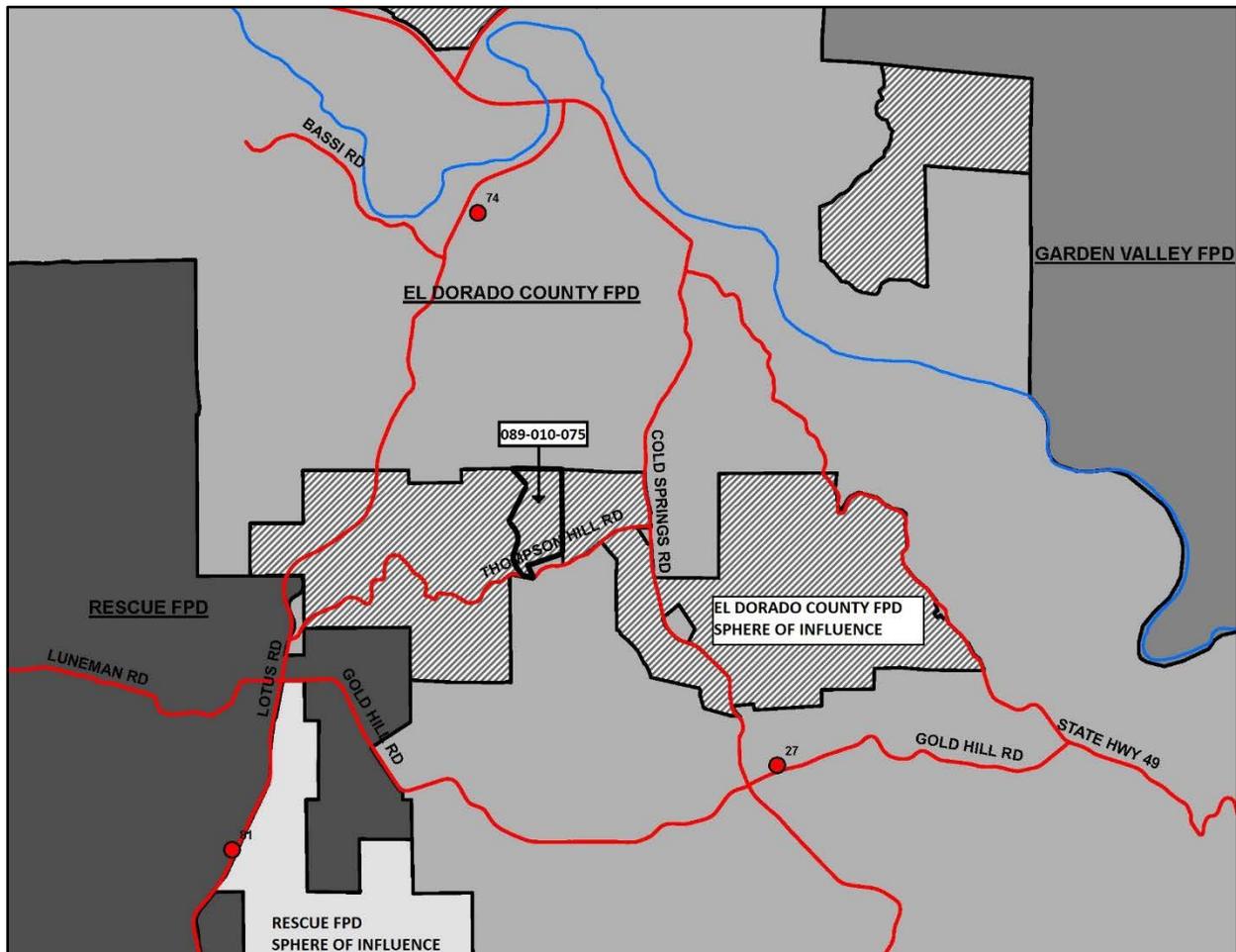
AGENT: Maria Kim, Complete Wireless Consulting, Inc., representing
AT&T Mobility

DESCRIPTION OF PROJECT

The proposal is a landowner petition to annex one parcel (APN 089-010-075), consisting of 50 acres, into the El Dorado County Fire Protection District (EDCFPD) for structural fire protection and emergency medical services. The petition was submitted by the landowners, represented by Complete Wireless Consulting, Inc. on behalf of AT&T Mobility. The parcel is currently developed with an existing single-family residence permitted in 1985, barn permitted in 2010, and newly constructed 115-foot stealth mono-broadleaf wireless communication tower permitted in 2019. A map of APN 089-010-075 and current EDCFPD boundaries is included along with the landowner petition as ***Attachment A***.

LOCATION

APN 089-010-75 is located at 5621 Big Sky Ranch Road, Placerville, on the north side of Thompson Hill Road, approximately 0.6 miles west of the intersection with Cold Springs Road in the Gold Hill area. The parcel is within the EDCFPD sphere of influence and is contiguous with EDCFPD's service area.



PURPOSE

Annexation is required as a condition of approval for the AT&T Tower Gold Hill/Coloma conditional use permit (CUP18-0007), approved by the Planning Commission May 23, 2019. The County determined that the telecommunications tower would result in an increased likelihood of the need for fire protection services to the site and APN 089-010-75 is not within the boundaries of a fire protection district. Annexation into the EDCFPD is necessary prior to receiving services from the District.

Annexation makes sense from a public safety and District equity standpoint. The annexation will allow the EDCFPD to extend fire protection and emergency medical services to the parcel, which is currently outside of, but adjacent to, the EDCFPD's service area. Annexation will also allow EDCFPD to recover revenue from the parcel through a portion of the property taxes and direct charges levied by the District.

RECOMMENDATION

Following an analysis of the annexation with consideration of the factors listed in Government Code §56668 and LAFCO Policies (summarized in Table 1, **Attachment B**), staff recommends that the Commission approve the AT&T / Bloxson Annexation into El Dorado County Fire Protection District; LAFCO Project No. 2019-04, by taking the following actions:

1. Recognize that El Dorado County, as the lead agency for the project, has prepared a Mitigated Negative Declaration and CEQA determinations which have been found to be adequate for the purposes of the annexation and direct staff to file a Notice of Determination in compliance with CEQA and local ordinances implementing the same.
2. Adopt LAFCO Resolution L-2020-11 (**Attachment F**), adding any additional conditions the Commission finds appropriate and approve the AT&T / Bloxsum Annexation into the El Dorado County Fire Protection District.
3. Waive the Conducting Authority Proceedings subject to Government Code §56663 and local policies.
4. Direct the Executive Officer to complete the necessary filings and transmittals as required by law.
5. Determine the effective date of the approval of this agreement to be five (5) working days after recordation by the County Recorder of the Executive Officer's Certificate of Completion once the imposed conditions are met.

BACKGROUND

AT&T Gold Hill / Coloma Tower Conditional Use Permit

The AT&T Gold Hill/Coloma Tower was part of the Federally funded Connect America Fund, which provides undeserved areas throughout the United States, including portions of El Dorado County, with high speed broadband internet.

Annexation into EDCFPD is a condition of approval for the AT&T Gold Hill/Coloma wireless communication facility conditional use permit (CUP18-0007), approved by the El Dorado County Planning Commission on May 23, 2019. The CUP allows for construction and operation of a new 115-foot communication tower in the Gold Hill/Coloma area to provide wireless high-speed internet and enhanced wireless network coverage. Annexation into EDCFPD was required as part of the County's conditional use permit approval process, because it was determined that the proposed telecommunications tower would result in an increased likelihood of the need for fire protection services to the site. Per the terms of CUP18-007, the annexation must be approved within five years.

The unmanned facility consists of a 115-foot high stealth mono-broadleaf wireless communication tower, enclosed walk-in equipment shelter, and emergency backup power generator. The cell tower and equipment are located within a leased 2,500 square-foot fenced compound in the northern-central portion of the 50-acre parcel, 300 feet from the existing single-family residence. Site construction is completed and the tower went on air on April 30, 2020.

Out-of-Agency Service Agreement

LAFCO approved an out-of-agency service agreement (OASA) between the landowners and EDCFPD on May 22, 2019 (LAFCO Project No. 2019-03), to allow EDCFPD to extend interim fire protection services to the parcel outside of its jurisdictional boundaries, in anticipation of annexation within two years.

Due to accelerated Federal Communications Commission timelines regarding wireless infrastructure review and approval, the annexation could not have been completed prior

to the issuance of building permits for the cell tower. As a work-around, El Dorado County agreed to condition the CUP to require an approved OASA prior to the issuance of building permits, followed by a completed annexation to EDCFPD within five years.

The OASA is a contract between EDCFPD and the landowners; LAFCO is not a party to the agreement, but LAFCO's discretionary approval was required per Government Code §56133. The terms of the OASA (**Attachment C**) stipulate that EDCFPD will provide fire protection and related services to APN 089-010-75 at 1½ times the otherwise applicable fees, until LAFCO records the Certificate of Completion annexing the subject property into the District, until the Agreement is terminated, or for a period of two years, whichever occurs first.

DISCUSSION OF STATUTORY AND POLICY CONSIDERATIONS

Government Code §56668 and LAFCO Policies require that the Commission review 30 factors of consideration in the review of a reorganization proposal. Each of the 30 factors is individually summarized in Table 1, and fully addressed in the following sections: I. Services, II. Cost and Revenues, III. Boundaries, IV. Potential Effect on Others and Comments, and V. Land Use Population and Planning.

I. SERVICES

Need for Services

The annexation will allow for the provision of, and equitable reimbursement for, extending essential services to the existing residence and communications tower. The existing family residence and approved communications tower increase the potential need for structural fire protection and emergency medical services to the area.

Existing and Necessary Infrastructure to Deliver Service

The closest staffed fire station is EDCFPD's Coloma/Lotus Station 74, located at 5122 Firehouse Road in Lotus, approximately 3.7 miles from the annexation site, followed by Station 25 at 3034 Sacramento Street, Placerville (8.1 miles away) and Station 28 at 3860 Ponderosa Road, Shingle Springs (10.1 miles away). No new infrastructure is necessary to deliver service to the subject parcel.

Ability of Annexing District to Provide Service

The estimated response time from Station 74 is 8 minutes, followed by 16 minutes from Stations 25 and 28. All response times are well within the County General Plan minimum standard for fire district response time of 15-45 minutes within Rural Centers and Rural Regions.

Station 74 is currently staffed part-time with a Division Chief who is also an accredited Paramedic. The station is also a "move-up and cover" location for ambulances. "Move-up and cover" is the reallocation of fire suppression or ambulance resources from their established location to a temporary location. Placerville Station 25 and Shingle Springs Station 28 are both staffed 24-hours a day, 7 days a week, by an Engine Company and Medic Unit. Station 28 also houses the District's Office of Emergency Services (OES) Engine, which is staffed when requested by Cal OES.

Timely Availability of Water Supply

The proposed annexation will not have any effect on the water supply available in the area. The subject parcel is within the El Dorado Irrigation District service area, but has a private well and septic system.

Service Impacts to Existing District Customers

The level of service the EDCFPD currently provides within its service area is not expected to change as a result of this annexation. The District and existing residents will benefit from the additional revenue from the annexed property.

Alternatives for Service

Mutual aid agreements exist among the local fire districts in order to ensure service is provided in the most efficient manner possible, no matter the jurisdictional boundaries of where the emergency call is located. Rescue Fire Protection District's Station 83 at 5122 Deer Valley Road, Rescue, is the closest, staffed mutual aid station to the annexation site. Station 83 is approximately 6.9 miles from the annexation site, with an estimated response time of 11 minutes.

Regardless of annexation, EDCFPD has the closest resources to the subject parcel and is the most likely agency to be the first responder to a fire or medical emergency. EDCFPD does not have out of district fees to recover costs for services; absent annexation, the District would have no mechanism in place to recoup its cost of service, which creates an issue of fiscal inequity for the agency.

Coordination of Applications

There are no additional public services required for the subject parcel which would require LAFCO action. The parcel is within the El Dorado Irrigation District for potential water service and the Gold Trail Recreation Zone of County Service Area 9 for recreation services. Nearby public roads are maintained by the County of El Dorado, and the private roads are maintained by the landowners.

The subject parcel is part of a much larger "service island" (1,500 acres / 31 parcels) that is within the EDCFPD sphere of influence, but not within the EDCFPD service area. Annexation applications can be initiated by landowner petition or district resolution.

Unlike the owners of APN 089-010-075, who were required to apply for annexation as a condition of approval for the telecommunications tower conditional use permit, the other landowners in the service island cannot be compelled to submit a landowner petition for annexation, absent further discretionary development. The Bloxsoms reportedly discussed annexation with their immediate neighbors before initiating the petition, but the neighbors were reportedly not interested in annexing into the District, primarily due to the special tax in the area. Any of the landowners could collectively or independently of one another choose to submit a landowner petition for annexation into EDCFPD at any time; Fire Protection District Law allows for the annexation of both contiguous and non-contiguous lands.

EDCFPD currently has an active application with LAFCO to annex 14 separate islands (El Dorado County Fire Protection District Island Annexation; LAFCO Project No. 2020-01), but this particular island is not included in that proposal. EDCFPD has

indicated that it is interested in eventually annexing all of its island territories into the District, as feasible.

II. COST AND REVENUES

Cost to Provide Service

Costs to provide service to the subject parcel are not expected to increase upon annexation. EDCFPD is the likely first responder to the subject parcel, regardless of any change in the jurisdictional boundaries; the annexation will allow EDCFPD to collect property tax and special tax revenue from the annexed property to help offset the costs of providing fire protection and emergency medical services.

Assessed Value / Property Tax Exchange Agreements

EDCFPD and El Dorado County negotiated a property tax increment for the proposed annexation area of 9.0944% for EDCFPD. The County Board of Supervisors adopted a property tax redistribution resolution approving this increment for the annexation on December 10, 2019 (**Attachment D**).

The total assessed value of APN 089-010-075 is \$445,786 (land \$94,466, structures \$352,320). The parcel is currently under a Williamson Act Contract, assessed as improved land in an active agricultural preserve.

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, enables landowners to apply to contract with the County to voluntarily restrict their land to agricultural and compatible uses. Restrictions are enforced through a rolling 10-year term contract. Unless the landowner or the County files a notice of nonrenewal, the 10-year contract is automatically renewed at the beginning of each year. In return for the voluntary restriction, contracted parcels are assessed for property tax purposes at a rate consistent with their actual (agricultural) use, rather than potential market value.

Property tax assessments under Williamson Act Contract are often much lower than they would be under Proposition 13 because they are based upon farming and open space uses as opposed to full market value. Homesites, non-living improvements and outbuildings are valued on the same basis as other property under Proposition 13.

Sufficiency of Revenues

The annexation is expected to provide sufficient revenue to cover the short- and long-term costs of providing fire protection services to the parcel. EDCFPD will collect revenue through property taxes based upon the property tax agreement and special tax. Collected revenue will offset the cost of providing water service to the parcel, but is not expected to exceed those costs.

In addition to property tax revenue, EDCFPD also levies a \$60 special tax in its Coloma/Lotus Zone for fire and emergency medical services. The special tax was passed by voters in 1981. Upon annexation, the \$60 Coloma/Lotus Zone special tax will be extended to the annexing parcel.

III. BOUNDARIES

Proximity to District Boundaries / Sphere of Influence

Government Code §56375.5 requires LAFCO actions regarding changes of district boundaries be consistent with the affected district's sphere of influence. The subject parcel is within the EDCFPD sphere of influence and is adjacent to the current EDCFPD service area to the north and south.

Creation of Irregular Boundaries

The subject parcel sits in the middle of a much larger "service island" of parcels that are surrounded by the EDCFPD service boundaries. The service island includes 31 parcels and covers a 1,500-acre area from Thompson Hill Road and Lotus Road, west to State Highway 49. Annexing APN 089-010-075 into EDCFPD will bisect the service island into two smaller islands.

EDCFPD staff has had prior discussions with LAFCO staff regarding identifying and annexing all of the District's existing islands, as feasible. LAFCO staff has identified 22 separate islands, consisting of approximately 250 parcels and 13,750 acres. In a decision based on complexity, costs and return on investment, EDCFPD currently has an active application with LAFCO to annex 14 separate islands (El Dorado County Fire Protection District Island Annexation; LAFCO Project No. 2020-01), but this particular island is not included in that proposal. EDCFPD has indicated that it is interested in eventually annexing all of its island territories into the District, starting with the most feasible and cost-effective.

The proposed annexation map has been reviewed by the El Dorado County Surveyor's Office and the boundaries of the proposed annexation conform to the existing lines of assessment and ownership of the subject parcel.

Topographical Information

The subject parcel sits at an approximately 1,370 feet in elevation. The general topography of the area is rolling hills with annual non-native grassland and thickets of native oaks and grey pine trees. Granite Creek is approximately 0.25 miles south of the project site. The annexation will not affect the Creek or associated riparian habitat and no topographical features that will hinder service to this area.

Fire Hazard Mitigation Plan

Effective January 1, 2019, LAFCOs are required to consider information contained in a local hazard mitigation plan, information contained in a safety element of a general plan, and any maps that identify land as a very high fire hazard zone, if it is determined that such information is relevant to the area that is the subject of the proposal.

El Dorado County's Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP), found within the Health and Safety Element of the General Plan, serves as the implementation program for the coordination of hazard planning and disaster response efforts within the County. The LHMP contains a Fire Hazard Severity Zone Map (FHSZ), prepared by Cal Fire's Fire and Resource Assessment Program, which identifies moderate, high, and very high fire hazard zones. The LHMP requires the consultation of the FHSZ in the review of all discretionary projects so that standards and mitigation measures appropriate to each hazard classification can be applied.

According to Cal Fire's most recent FHSZ map (adopted 2007), the majority of the subject parcel is designated as a moderate fire hazard zone (approximately 80%); a smaller portion of the parcel is designated as a high fire hazard zone (approximately 20%). Similarly, the majority of the land surrounding the annexation area is designated as a moderate fire hazard zone; however, some of the surrounding land is designated as a high fire hazard zone.

Annexation benefits both the landowners and the District, by providing a fair share of additional revenue to EDCFPD to be used for essential fire and emergency medical services.

IV. POTENTIAL EFFECT ON OTHERS AND COMMENTS

Effect on Adjacent Areas

The proposed annexation will have a minimal effect on adjacent areas. The extension of fire and emergency medical services to the site will not affect the ability of other landowners to petition for annexation into the EDCFPD for similar services, nor will it have an adverse effect on the District's ability to provide those services to its existing customers.

Effect on Environmental Justice

LAFCOs are required to consider the extent to which a proposal will promote environmental justice, with respect to the location of public facilities and the provision of public services, to ensure that the effects of pollution are not disproportionately borne by any particular population or communities.

The annexation proposal will not have any effect on the promotion of environmental justice within the annexation area or surrounding areas. The annexation will not alter the land use in or around the annexation site, nor will it increase or decrease the level of pollution in the immediate area. The annexation proposal will also not have an adverse effect on the ability of neighboring land owners to receive service from EDCFPD or to petition LAFCO to annex into the District for services.

Effect on Other Community Services

There are no negative impacts expected for other public service providers to the annexation area. Other public service providers to the affected territory include: El Dorado Irrigation District (available water service), County Service Area 9, Gold Trail Recreation Zone (park and recreation services), Gold Trail Union School District and El Dorado Union High School District (schools), and the El Dorado County Sheriff's Department (law enforcement).

Comments and/or Objections from Other Agencies and the Landowner(s)

The following agencies were notified of, and provided an opportunity to comment on this proposal:

- El Dorado County Assessor's Office
- El Dorado County Auditor's Office
- El Dorado County Chief Administrative Office
- El Dorado County Department of Agriculture
- El Dorado County Elections Department

- El Dorado County Emergency Services Authority
- El Dorado County Farm Bureau
- El Dorado County Office of Education
- El Dorado County Planning Department
- El Dorado County Representing County Service Areas 7, 9, 9 Zone 19, 10, and 10 Zone H
- El Dorado County Resource Conservation District
- El Dorado County Sheriff's Department
- El Dorado County Surveyor's Office
- El Dorado County Water Agency
- El Dorado Irrigation District
- El Dorado Union High School District
- Gold Trail Union School District
- Los Rios Community College District
- Rescue Fire Protection District

As part of the standard notification process, LAFCO sent a project notice requesting agency comments to all affected agencies in September 2019, and a project hearing notification in June 2020. El Dorado County Planning submitted comments relating to Conditional Use Permit CUP18-0007, specifically the requirement for an executed Out of Agency Service Agreement between the landowner and EDCFPD prior to the issuance of building permits for the telecommunications tower (satisfied) and annexation into the District within five years of the CUP approval. LAFCO has not received any comments from the above affected agencies in response to the proposed annexation. EDCFPD also reviewed the application notification, but had no concerns and did not submit comments.

The annexation petition was initiated by the landowners, represented by AT&T Mobility and Complete Wireless Consulting. The landowners are in full support of the change of organization.

Public Notice

A notice of public hearing was published in the Mountain Democrat 21 days in advance of this hearing (July 1, 2020). As of the date of this report, LAFCO has not received any comments from the public in response to the proposed annexation.

V. LAND USE, POPULATION AND PLANNING

Zoning and Land Use Designations, Consistency with General / Specific Plans

The subject parcel is designated Agricultural Lands (AL) per the El Dorado County General Plan and zoned Agricultural Grazing, 40-Acre Minimum (AG-40). The single-family residence permitted in 1985, barn permitted in 2010, and limited agricultural use (large animal grazing) are consistent with the zoning and land use. The 115-foot high stealth mono-broadleaf wireless communication tower is a conditionally permitted use in the AG-40 zone, allowable under CUP18-0007. The telecommunications tower conforms with the development standards for communication facilities contained in El Dorado County Zoning Code Section 130.40.130.D.

Section 130.40.130 of the Zoning Ordinance allows wireless facilities within the residential and rural zoning designations, subject to the approval of a Conditional Use Permit by the Planning Commission.

Surrounding Land Uses

The annexation site is located in a Rural Region of the County. Surrounding land uses include rural residential development and agricultural uses. There are three rural residences located near the general vicinity of the annexation area, approximately 900-1,200 feet west, south and east of the subject parcel. Adjacent parcels to the east and west are zoned Agricultural Grazing, 40-Acre (AG-40), parcels to the north are zoned Rural Lands, 20-Acre (RA-20) and Limited Agricultural, 20-Acre (LA-20), and parcels to the south are zoned Estate Residential, 5-Acre (RE-5).

Surrounding Area	Land Use Designation	Zoning	Current Land Use	Planned Land Use
Project Site: 089-010-075	AL	AG-40	Rural residential and agricultural, Single-family residence & telecommunications tower	No change
North:	AL	RL-20 & LA-20	Rural residential and agricultural	No change
West:	AL	AG-40	Rural residential and agricultural, Single-family residence	No change
East:	AL	AG-40	Rural residential and agricultural, Single-family residence	No change
South:	LDR	RE-5	Rural residential and agricultural, Single-family residence	No change

Impact to Agriculture / Open Space

The annexation will not have an adverse effect on agriculture or open space lands. The parcel is located in a designated Rural Region of the County and is within the Gold Hill Agricultural District overlay. Surrounding land uses include similar, larger parcels (10-60 acres) of Agricultural Lands to the north, west and east, and smaller (2-7 acre) Estate Residential parcels to the south. All of the adjacent zoning designations allow residential uses and varying intensities of agricultural uses by right.

The Agricultural Commission reviewed the AT&T Gold Hill/Coloma wireless communication facility on April 10, 2019, and recommended the Planning Commission approve the special use permit for the proposed cell phone tower location, based on the placement not having an impact on agriculture on the subject parcel and the adjacent area. The Agricultural Commission confirmed that the project parcel is under a Williamson Act Contract; the Commission also confirmed that the communications tower would have no impact on the parcel's farmland conservation contract.

Based in part on the Agricultural Commission's recommendation, the Planning Commission determined separately on May 23, 2019 that the communications tower is compatible with, and would not interfere with, existing or future adjacent agricultural or residential uses.

Territory that is now known as APN 089-010-075 has been under Williamson Act Contract since 1971, starting out with a total of 370 acres in Agricultural Preserve No. 133. In the following decades, that contract was amended and new contracts were created due to rollouts, parcel splits, boundary line adjustments, and changes in ownership. The current Williamson Act Contract, Agricultural Preserve No. 316, was established in 2008 and amended in 2015 to its current form, after a boundary line adjustment decreased the size of the parcel from 60 acres to 50. Agricultural Preserve No. 316 is currently active and will remain so until at least 2030.

The proposed annexation would not involve changes in the existing environment which, due to their location or nature, could individually or cumulatively result in loss of Farmland to non-agricultural use. The El Dorado County Resource Conservation District also had an opportunity to review the annexation proposal and did not identify any impacts to surrounding natural resources.

Population and Growth in the Area

There are currently two registered voters residing in the proposal area, therefore the subject territory is considered uninhabited per Government Code §56046, which states, *"Inhabited territory" means territory within which there reside 12 or more registered voters...All other territory shall be deemed "uninhabited"*.

The parcel is developed with a single-family residence, barn, and 115-foot communications tower, in accordance with the AG-40 zoning and conditional use permit CUP18-0007. The current Agricultural Grazing, 40-Acre Minimum zoning would not allow for splitting the 50-acre parcel. El Dorado County Code Section 17.36.070 (D) restricts the residential use of land in an agricultural preserve to one dwelling unit per contract.

Regional Housing Needs Considerations

The annexation proposal does not include any type of new housing or residential development; therefore, it will neither assist or detract from the County's ability to achieve its RHNA (Regional Housing Needs Assessment) targets.

CEQA

The El Dorado County Planning Commission, acting on behalf of El Dorado County as Lead Agency for the project, adopted a Mitigated Negative Declaration of Environmental Impact (MND) for the AT&T Tower Gold Hill/Coloma conditional use permit (CUP18-0007) on May 23, 2019 (**Attachment E**). CUP18-0007 requires the annexation of APN 089-010-075 into the EDCFPD and the environmental impacts of the annexation were addressed within the scope of this environmental document as well. The MND included a Mitigation Monitoring and Reporting Program (MMRP) that addressed measures necessary to mitigate the potentially significant effects that the project could have on the surrounding area, and identified the responsible parties and included the provisions to be followed. El Dorado County, in accordance with the California Environmental Quality Act ("CEQA") ultimately determined that, with implementation of adopted mitigation measures as described in the MND and MMRP, the project would not have a significant impact on the environment.

DETERMINATIONS

After reviewing the factors discussed above and summarized in Table 1 (***Attachment B***), the Commission should make its own determinations regarding the project. Staff recommends the following determinations based on project research, state law and local policies:

1. The subject territory is “uninhabited” per Government Code §54046. Application for this annexation is made subject to Government Code §56650 et. seq. by landowner petition.
2. The territory proposed for annexation is within the sphere of influence of the El Dorado County Fire Protection District and is contiguous to the existing boundary. The annexation will provide a more logical and orderly boundary.
3. The Mitigated Negative Declaration prepared for this project by El Dorado County satisfies the requirements of the California Environmental Quality Act.
4. The annexation will not result in negative impacts to the cost and adequacy of service otherwise provided in the area, and is in the best interests of the affected area and the total organization of local government agencies.
5. The annexation will not have an adverse effect on agriculture and open space lands.
6. The annexation will have no effect on water supply available for the buildout of regional housing needs determined by the Sacramento Area Council of Governments.

ATTACHMENTS

- Attachment A: Landowner Application, Project Information and Map
- Attachment B: Table 1: Summary of Statutory and Local Policy Factors to be Considered
- Attachment C: El Dorado County Fire Protection District-Bloxsom Out of Agency Service Agreement
- Attachment D: El Dorado County Board of Supervisors Resolution 213-2019
- Attachment E: CUP18-0007 Adopted Mitigated Negative Declaration
- Attachment F: LAFCO Draft Resolution L-2020-11 and Exhibit A: Annexation Map and Legal Description