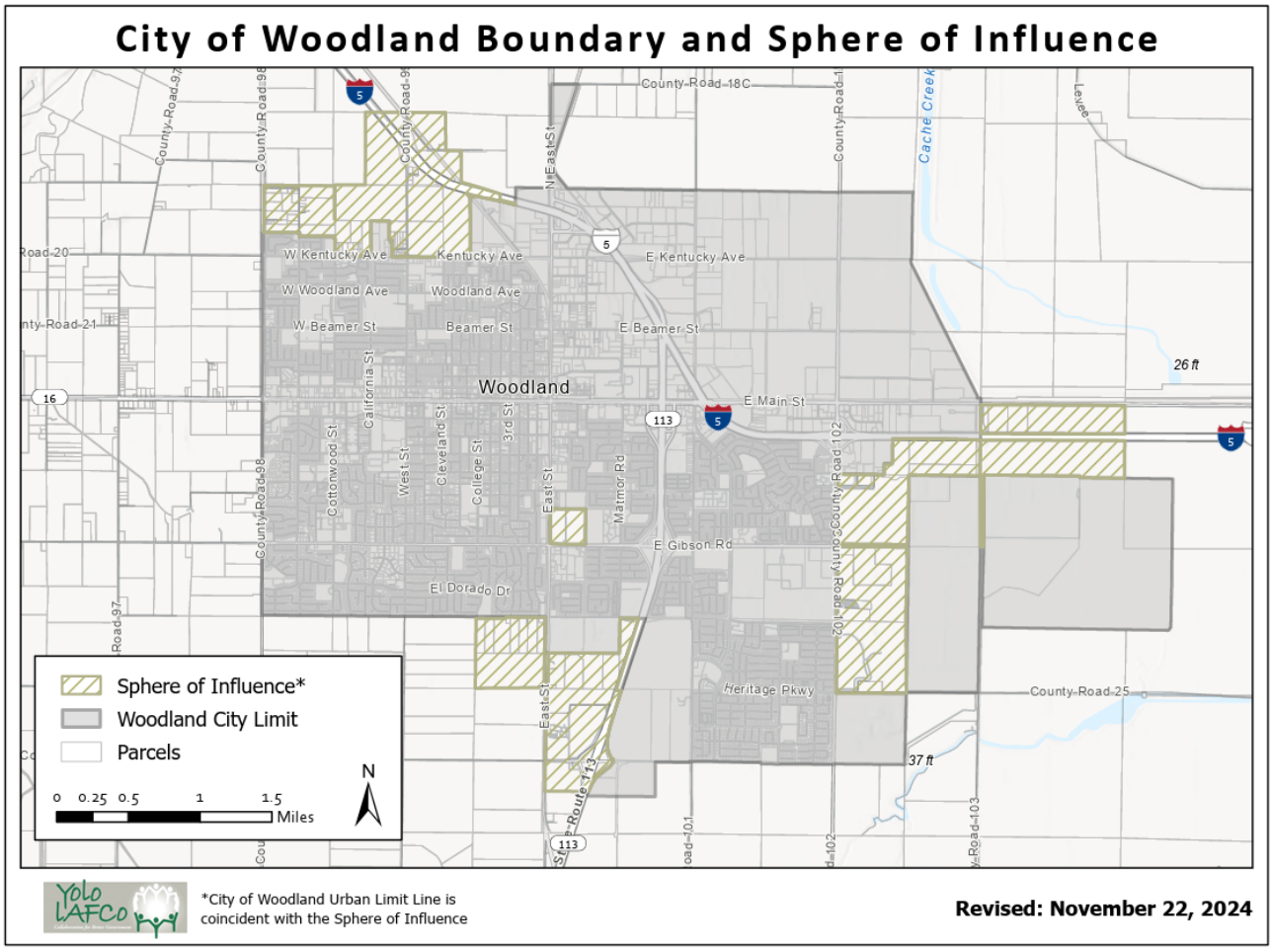
AGENCY PROFILE

The City of Woodland, first incorporated in 1871, is a general law City under the provisions of the State of California. The City is a legally separate and fiscally independent agency. It can issue debt, set and modify budgets, collect fees for services, and sue or be sued.

Woodland operates under the Council-Manager form of government with a five-member council, elected by district by city residents. A directly elected five-member City Council represents citizens in determining services and regulations to be provided by the City. The Council appoints a full time City Manager whose job is to carry out the Council's policy directives and to coordinate, control and direct City operations, functions, and projects. The City Manager serves as the administrative head of city government overseeing the departments of administrative services, community development, community services, finance, fire, library, police, and public works. In making its policy determinations, the Council works with advisory committees and receives other citizen input from the public at its regular and special meetings. The Council's business meetings are scheduled for the first and third Tuesday of each month in the Council Chambers of City Hall. Other special or study session meetings are scheduled as needed and are open to the public.

The City has ten council-appointed commissions that are devoted to various aspects of community life including: building appeals, aging, historical preservation, library, manufactured home fair practices, parks and recreation, personnel, planning traffic safety, and utility undergrounding.

Below is the current City boundary and sphere of influence (SOI).



MUNICIPAL SERVICE REVIEW

POTENTIALLY SIGNIFICANT MSR DETERMINATIONS

The MSR determinations checked below are either significant or potentially significant, as indicated by answers to the key policy questions in the checklist and corresponding discussion on the following pages. If most or all of the determinations are not significant, as indicated by "no" answers, the Commission may find that a comprehensive MSR update is not warranted.

- ☐ Growth and Population
- ☐ Disadvantaged Unincorporated Communities
- ☒ Capacity, Adequacy & Infrastructure to Provide Services
- ☐ Financial Ability
- ☐ Shared Services
- ☐ Accountability
- ☐ Broadband Access
- ☒ Status of Previous MSR Recommendations

LAFCO MUNICIPAL SERVICE REVIEW:

☒ On the basis of this initial evaluation, the required determinations are not significant, and staff recommends that a comprehensive MSR is NOT NECESSARY. The subject agency will be reviewed again in five years per Government Code Section 56425(g).

☐ The subject agency has significant and/or potentially significant determinations and staff recommends that a comprehensive MSR IS NECESSARY and has been conducted via this checklist.

1. Growth and Population Growth and population projections for the affected area.	**Significant Issue**	**Potentially Significant**	**No Issue**
a) *Will development and/or population projections over the next 5-10 years impact the subject agency's service needs and demands?*	☐	☐	☒
b) *Do changes in service demand suggest a change in the agency's services?*	☐	☐	☒

Discussion:

According to the State Department of Finance population projections[1], the City of Woodland population increased from 60,052 as of January 1, 2023 to 60,672 in 2024, a 1.0 percent increase. Projections suggest the population countywide will go up 3% by 2030 and 16% by 2040[2].

The City of Woodland completed a comprehensive General Plan Update in May 2017 and has ample space within its current SOI to accommodate planned growth through 2035. The City is not anticipating any SOI changes during this planning horizon.

[1] State of California Department of Finance Population Estimates for Cities, Counties, and the State – January 1, 2023 and 2024

[2] Report P-2A: Total Estimated and Projected Population for California and Counties: July 1, 2020 to 2070. Projections Prepared by Demographic Research Unit, California Department of Finance, Sep 2024.

Growth and Population MSR Determination

City growth and development is occurring consistent with its adopted 2035 General Plan adopted in May 2017. City development and population growth is not anticipated to have a significant negative impact on City services and/or require an update to its SOI.

Recommendation(s)

None.

2. Disadvantaged Unincorporated Communities

The location and characteristics of any disadvantaged unincorporated communities within or contiguous to the sphere of influence.

		Significant Issue	Potentially Significant	No Issue
a)	*If the subject agency provides services related to sewers, municipal and industrial water, or structural fire protection, are there any "inhabited unincorporated communities" (per adopted Commission policy) within or adjacent to the subject agency's sphere of influence that are considered "disadvantaged" (80% or less of the statewide median household income) that do not already have access to public water, sewer, and structural fire protection?*	☐	☐	☒
b)	*If "yes" to a), it is feasible for the agency to be reorganized such that it can extend service to the disadvantaged unincorporated community? If "no" to a), this question is marked "no" because it is either not needed or not applicable.*	☐	☐	☒

Discussion:

The West Kentucky (aka "Westucky") community is likely a disadvantaged unincorporated community (DUC) within the City of Woodland's SOI. This community already received structural fire protection services from the City via contract with the Springlake Fire Protection District. In 2019, Yolo County, Yolo County Housing and the City of Woodland all partnered on an agreement (with LAFCo approval) to extend City water and sewer services to this community. The City plans to annex this community within the next 1-2 years.

Disadvantaged Unincorporated Communities MSR Determination

The West Kentucky (aka "Westucky") community is considered a disadvantaged unincorporated community (DUC) within the City of Woodland's Sphere of Influence. The community has received City fire protection services for decades, and City water and sewer services were extended in 2019. The City plans to annex this area in the next 1-2 years. Therefore, there is equity in the provision of essential municipal services to this adjacent DUC.

Recommendation(s)

None.

3. Capacity and Adequacy of Public Facilities and Services

Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies including needs or deficiencies related to sewers, municipal and industrial water, and structural fire protection in any disadvantaged, unincorporated communities within or contiguous to the sphere of influence.

	Significant Issue	Potentially Significant	No Issue
a) *Are there any deficiencies in the **infrastructure, equipment, and capacity of agency facilities** to meet existing service needs for which the agency does not have a plan in place to resolve (including deficiencies created by new state regulations)?*	☐	☒	☐
b) *Are there any issues regarding the agency's capacity and ability to meet the service demand of reasonably foreseeable future growth?*	☐	☐	☒
c) *Are there any service needs or deficiencies for disadvantaged unincorporated communities related to sewers, municipal and industrial water, and structural fire protection within or contiguous to the agency's sphere of influence?*	☐	☐	☒
d) *Is the agency needing to consider climate adaptation in its assessment of infrastructure/service needs?*	☐	☐	☒

Discussion:

The City of Woodland provides 10 distinct categories of municipal services including: cemetery; community facilities, parks and open space; community recreation; fire; library; municipal water; police; solid waste & recycling; road construction, road maintenance, street lighting and landscaping; wastewater, stormwater & recycled water. The City provides waste management services via contract with Waste Management.

The City is struggling with several municipal service issues and is actively working to address them:

- To address capacity needs, the City Council voted to place a one-cent sales tax measure on the November 2024 ballot. The measure was intended to provide annual local funding for certain services, such as: maintaining public spaces; addressing homelessness; improving/maintaining parks; repairing roads, potholes, and sidewalks; reducing emergency response times; and increasing police and fire protection. Firefighter, police, and first responder staffing has not kept pace with the City's growing population. The sales tax measure failed at the November 2024 election.
- The City's Storm Drain system continues to deteriorate, and it will require repairs and replacements in older areas of the City. The Storm Drain Fund currently has an unrestricted net position of $1.4 million, with total net position of $13.4 million. Development fees pay for new construction only; maintenance impacts stemming from past and future new construction will continue to burden this fund. Storm drain rate increases must be voter approved and an attempt to increase the fee failed in August 2007. The City is working on a new rate study and outreach plan with hopes to have a successful adjustment to the user fees.
- The City is also working on a solution to provide protection against potential future flooding events from the lower Cache Creek with the US Army Corps of Engineers. However, a measure to provide a flooding solution failed at the March 2024 election.

Capacity and Adequacy of Public Facilities and Services MSR Determination

The City is struggling in several areas with respect to capacity and services issues related to maintaining parks, repairing roads/sidewalks, repair/replacing the stormwater system, flood improvements, and increasing police and fire staffing. Voters have rejected the City's attempts to pass funding measures. However, the City is aware and actively working on plans to address these issues, and a comprehensive

MSR will not shed any additional light or add value to addressing these needs. The City is not seeking to expand its SOI at this time and LAFCo will re-evaluate the City's capacity for growth during the next MSR cycle.

Recommendation(s)

None.

4. Financial Ability

Financial ability of agencies to provide services.

		Significant Issue	Potentially Significant	No Issue
a)	*Is the subject agency in a stable financial position, i.e. does the 5-year trend analysis indicate any issues?*	☐	☐	☒
b)	*Is there an issue with the organization's revenue sources being reliable? For example, is a large percentage of revenue coming from grants or one-time/short-term sources?*	☐	☐	☒
c)	*Is the organization's revenue sufficient to fund an adequate level of service, necessary infrastructure maintenance, replacement and/or any needed expansion? Is the fee inconsistent with the schedules of similar local agencies*	☐	☐	☒
d)	*Does the subject agency have a capital improvement plan (CIP)? Has the agency identified and quantified what the possible significant risks and costs of infrastructure or equipment failure? Does the agency have a reserve policy to fund it?*	☐	☐	☒
e)	*Does the agency have any debt, and if so, is the organization's debt at an unmanageable level? Does the agency need a clear debt management policy, if applicable?*	☐	☐	☒
f)	*Can the subject agency improve its use of generally accepted accounting principles including: summaries of all fund balances, summaries of revenues and expenditures, general status of reserves, and any un-funded obligations (i.e. pension/retiree benefits)? Does the agency have accounting and/or financial policies that guide the agency in how financial transactions are recorded and presented?*	☐	☐	☒
g)	*Does the agency staff need to review financial data on a regular basis and are discrepancies identified, investigated and corrective action taken in a timely manner? The review may include reconciliations of various accounts, comparing budgets-to-actual, analyzing budget variances, comparing revenue and expense balances to the prior year, etc. If the agency uses Yolo County's financial system and the County Treasury, does the agency review monthly the transactions in the County system to transactions the agency submitted to the County for processing?*	☐	☐	☒
h)	*Does the agency board need to receive regular financial reports (quarterly or mid-year at a minimum) that provide a clear and complete picture of the agency's assets and liabilities, fully disclosing both positive and negative financial information to the public and financial institutions?*	☐	☐	☒

Discussion:

The City of Woodland implements sound financial management practices, adopting an annual budget, spending within its budget, and performing independent audits. The City's debt is at manageable levels.[3]

CITY OF WOODLAND
STATEMENT OF REVENUES, EXPENDITURES AND CHANGES IN FUND BALANCES
TOTAL OF ALL GOVERNMENTAL FUNDS

	2018	2019	2020	2021	2022
Revenue					
Taxes	$ 34,618,156	$ 38,378,801	$ 38,452,546	$ 46,407,353	50,687,145
Fines and penalties	297,811	281,319	345,632	207,211	267,516
Intergovernmental	11,934,610	15,577,966	15,806,740	15,832,789	55,124,568
Charges for services	9,248,795	10,563,625	9,933,640	10,478,440	10,388,506
Licenses, fees, and permits	15,894,262	15,567,020	29,342,524	13,340,386	11,948,690
Investment earnings	(386,339)	3,055,150	3,529,458	346,598	(8,298,521)
Developer fees	-	18,445,546	-	11,879,305	4,923,593
Other revenues	1,065,323	1,412,232	1,026,112	5,670,623	3,198,467
Total revenue	72,672,618	103,281,659	98,436,652	104,162,705	128,239,964
Expenditures					
Current:					
General government	$ 2,895,020	$ 2,186,017	$ 2,186,467	$ 2,082,011	$ 7,296,662
Finance	1,041,329	880,203	1,021,046	1,124,132	1,263,325
Community development	6,622,097	7,943,806	6,564,694	9,991,742	20,157,269
Parks and recreation	7,258,156	7,767,335	8,418,234	8,575,819	10,087,237
Police	20,971,073	19,958,636	21,070,298	21,369,628	23,101,383
Fire	12,059,952	10,739,443	11,252,579	12,170,503	13,457,000
Library	1,996,478	2,024,877	2,361,547	2,060,288	2,525,752
Public works	14,764,730	19,844,331	25,218,960	34,668,079	23,662,602
Debt service:					
Principal payments	6,174,050	18,019,508	16,304,615	7,600,411	4,250,584
Interest and fiscal charges	711,246	458,796	301,645	263,393	207,504
Total expenditures	74,494,131	89,822,952	94,700,085	99,906,006	106,009,318
Net income (loss)	**(1,821,513)**	**13,458,707**	**3,736,567**	**4,256,699**	**22,230,646**
Other financing (uses) sources					
Proceeds from debt	-	19,427,726	-	-	-
Bond issuance	-	-	-	-	22,000,000
Contribution from developer advances	-	-	-	4,024,530	-
Transfers in	9,193,515	8,313,009	11,100,690	11,960,977	24,228,788
Transfers out	(15,065,710)	(11,784,022)	(15,080,917)	(16,363,366)	(31,772,384)
Total other financing	(5,872,195)	15,956,713	(3,980,227)	(377,859)	14,456,404
Net Change in Fund Balances	(7,693,708)	29,415,420	(243,360)	3,878,840	36,687,050
Fund Balance					
Beginning fund balances (2019 as restated)	83,475,670	76,281,962	105,835,218	105,591,858	109,470,698
Ending fund balances	$ 75,781,962	$ 105,697,382	$ 105,591,858	$ 109,470,698	$ 146,157,748
Debt					
Total primary government debt	$ 285,289,199	$ 267,837,317	$ 243,326,463	$ 229,456,776	$ 285,358,970
Interest & payments as % of expenditures	9.24%	20.57%	17.54%	7.87%	4.21%

[3] Source: City of Woodland Annual Comprehensive Financial Reports 2018-2022

The City's final budgeted appropriations in the General Fund increased by $15.6 million from the originally adopted budget in FY21/22. This increase was due primarily to carryover of money for projects not completed by the end of FY21, additional costs needed for contract inspection services to backfill a staff vacancy and manage increasing activity, overtime costs related to firefighters sent on strike teams throughout the state, a one-time extra payment toward the CalPERS unfunded liability, and increased transfers out of the fund of special sales tax revenues more than the original budget. These increases were possible due to better than anticipated revenues in almost all categories within the General Fund, as well as receipt of revenue recovery funds from the American Rescue Plan Act to assist with various public interest projects.

The City's total revenue was $177.3 million for the year ended June 30, 2022, an increase of $21.9 million or 14 percent from FY20/21. The increase in operating grants and contributions is due mostly to receipt of transportation funding related reimbursements that have been delayed for several years, as well as receipt of some operating grant money not previously received, specifically funding to address homelessness and affordable housing.

The charges for services in the business type activities increased by $1.0 million between FY2020/21 and FY2021/22. This increase is primarily due to the previously approved 5.5% rate increase that was effective in the Water Fund, as well as increased water consumption in the City, and new development adding new accounts to the utility system. Other categories of revenues within the business type activities remained fairly consistent between FY2020/21 and FY2021/22.

The cost for all governmental activities this year was $90.25 million. The City's taxpayers paid for approximately 53 percent of these costs; $47.9 million (including property, sales and other taxes revenues). Fees, including developer fees, grants and contributions funded the balance of the costs of governmental activities. Total cost of services remained consistent between FY2021 and FY2022 at $90 million. The net cost of services (total cost offset by related revenues) for FY2021/22 decreased by $25.1 million. As noted previously, total costs did not change, but related revenues were increased. The most significant changes were in the revenues received for Operating Grant and Contributions for reimbursable grant related projects and delayed payments for transportation related funding. These contributed mostly to the decreased net cost for Community Development and Public Works.

Major capital expenditures in FY 2022 included the following:

- Improvements for pedestrian mobility and safety, including rehab of a major roadway were completed during the year, which added $5.7 million in governmental activities and the $0.6 million in business type activities was infrastructure.
- Construction of a new pedestrian overcrossing to provide pedestrian and bikeway safety to cross over the State Route 113 is underway and added $2.4 million to construction in progress.
- Major road rehabilitation with expanded bikeway and pedestrian pathways added $4.4 million to construction in progress for governmental activities.
- Construction of improvements to allow for relocation of the homeless shelter in the city added $2.7 million to construction in progress; the entire project was completed and reclassified to infrastructure.
- Replacement and upgrade of a major water main and sewer pipelines added $4.0 million to construction in progress; the project was completed and $5.2 million was reclassified to infrastructure.

At June 30, 2022 and 2021, the City had $214.4 million and $229.5 million, respectively, in long-term debt outstanding. The outstanding debt of governmental activities decreased approximately $3.4 million due mostly to continued principal payments on outstanding debt. Outstanding debt of business-type activities decreased approximately $11.7 million because of continued principal payments on outstanding obligations, refunding of existing bond debt, and no new debt was incurred. The City continues to maintain good credit ratings on its debt issues.

The General Fund budget for FY 2022/23 appropriates $67.95 million, which is a decrease of $9.3 million from final appropriations for FY21/22. The decrease is due largely to the fact that the FY21/22 final budget included significant appropriations for a one-time extra payment to CalPERS and other one-time allocations

for projects, including allocations toward a future fire station and second community pool. The appropriations for FY2022/23 include $3.5 million in one-time allocations, the largest of which is a $2 million set aside for construction of a second community pool. General Fund revenue for FY22/23 is projected to be $63.8 million, which is $5.5 million more than the original revenue budget for 2021/22, due mostly to improved revenue performance in property and sales taxes.

Financial Ability MSR Determination

The City of Woodland practices sound financial management, adopting budgets, spending within its limits, and preparing annual comprehensive financial reports. City revenues have exceeded expenses in each of the last four fiscal years, increasing its fund balance. The City has adequate reserve to protect against unexpected events or upcoming significant costs. The City's water and sewer rate/fee schedules are sufficient to fund an adequate level of service, and the City is working to increase the rates for stormwater maintenance and restructure its City cemetery. The City's debt is at a manageable level. The City funds necessary maintenance upgrades in its capital improvement budget and plans.

Recommendation(s)

None.

5. Shared Services and Facilities

Status of, and opportunities for, shared facilities.

	Significant Issue	Potentially Significant	No Issue
a) *Are there any opportunities for the organization to share services or facilities with neighboring, overlapping, or other organizations that are not currently being utilized?*	☐	☐	☒

Discussion:

The City is currently partnering with other cities, Yolo County, and other local agencies on shared services. It provides fire protection services to Springlake FPD. The City also participates in many regional programs addressing shared resources, services, and facilities.

The City is a member of a number of joint powers agencies/authorities (JPAs) and other regional joint ventures in which the City has a shared interest and exercises shared services including: Sacramento Area Council of Governments (transportation planning agency), Yolo County Transportation District (bus services), Woodland-Davis Clean Water Agency, Woodland Finance Authority, Yolo Animal Services Planning Agency, Yolo County Public Agency Risk Management Insurance Authority, Yolo Emergency Communications Agency, Yolo Habitat Conservancy (habitat conservation) and Yolo Subbasin Groundwater Authority (groundwater management).

Shared Services MSR Determination

The City is currently partnering with other cities, Yolo County, and other local agencies on shared services, JPAs, and other regional joint ventures. LAFCo is not aware of any opportunities for the organization to share services or facilities with neighboring, overlapping, or other organizations that are not currently being utilized.

Recommendation(s)

None.

6. Accountability, Structure, and Efficiencies

Accountability for community service needs, including governmental structure and operational efficiencies.

		Significant Issue	Potentially Significant	No Issue
a)	*Are there any recommended changes to the organization's governmental structure or operations that will increase accountability and efficiency (i.e. overlapping boundaries that confuse the public, service inefficiencies, and/or higher costs/rates)?*	☐	☐	☒
b)	*Does the agency need to secure independent audits of financial reports that meet California State Controller requirements? Are the same auditors used for more than six years? Are audit results not reviewed in an open meeting?*	☐	☐	☒
c)	*Is the agency insured or in a risk management pool to manage potential liabilities?*	☐	☐	☒
d)	*Are there any issues with filling board vacancies and maintaining board members? Is there a lack of board member training regarding the organization's program requirements and financial management?*	☐	☐	☒
e)	*Are there any issues with staff capacity and/or turnover? Is there a lack of staff member training regarding the organization's program requirements and financial management?*	☐	☐	☒
f)	*Are any agency officials and designated staff current in making their Statement of Economic Interests (Form 700) disclosures?*	☐	☐	☒
g)	*Does the agency have adequate policies (as applicable) relating to personnel/payroll, general and administrative, board member and meetings, and segregating financial and accounting duties among staff and/or board to minimize risk of error or misconduct (see suggested policies list)?*	☐	☐	☒
h)	*Does the organization need to improve its public transparency via a website (see https://www.yololafco.org/yolo-local-government-website-transparency-scorecards)?*	☐	☐	☒

Discussion:

None.

Accountability, Structure, and Efficiencies MSR Determination

LAFCo is not aware of any recommended changes to the City's governance to increase accountability and efficiencies. City meetings are accessible and well publicized in accordance with the Brown Act. There are no issues with filling city council vacancies and maintaining members. The City staff have been relatively stable for the last five years. The City prepares annual audits which are posted on the City's website, although they are posted around a year later than the recommended GASB turnaround time. For example, the City's FY2022 audit was just adopted in April 2024. The City of Woodland received a 93% on the 2024 Yolo Local Government Website Transparency Scorecard[4].

[4] https://www.yololafco.org/yolo-local-government-website-transparency-scorecards

Recommendation(s)

None.

7a. Broadband Access

Any other matter related to effective or efficient service delivery, as required by commission policy.

Per Yolo LAFCo Project Policy 6.2 "*it is the intent of Yolo LAFCo to comprehensively review broadband access in MSRs of local agencies that either serve communities and/or provide emergency services where broadband connection is critical (i.e. cities, CSDs, CSAs, FPDs and RDs).*"

		Significant Issue	Potentially Significant	No Issue
a)	*Is there a lack of high-performance broadband (25/3 Mbps) available in the community?*	☐	☐	☒
b)	*Is there a lack of low-income subscription rates and/or digital literacy programs available?*	☐	☐	☒

Discussion:

The CPUC California Broadband Availability Map[5] indicates for most of the City, WAVE provide speeds up to 1 gig and AT&T provides speeds up to 50/10 Mbps in the green colored areas, but the red colored and uncolored areas either have legacy technology or independent infrastructure. The red square south of downtown and west of SR 113 is the County Fairgrounds. Both providers offer low-income subscription rates and digital literacy assistance is available at the local library.

[5] https://www.broadbandmap.ca.gov/

Broadband Access MSR Determination

The CPUC California Broadband Availability Map indicates the City of Woodland has broadband access in the majority of the City, but there are a few pockets where there is a lack of high-performance broadband (25/3 Mbps) available in the community.

Recommendation(s)

None.

7b. Status of Previous MSR Recommendations

Any other matter related to effective or efficient service delivery, as required by commission policy.

	Significant Issue	Potentially Significant	No Issue
a) *Are there any recommendations from the agency's previous MSR that have not been implemented?*	☐	☒	☐

Discussion:

Below are the LAFCo recommendations from the City of Woodland's 2019 MSR and status:

1. The City of Woodland should review and/or improve its budget monitoring process to minimize or eliminate overdrawn appropriations.	Completed.
2. The City of Woodland should create a strategy and necessary studies to increase its storm drainage fees since this fund has an accumulated net operating loss of almost $5M over the past five years.	The City's FY2022 ACFR indicates studies are underway, but an updated fee has not gone to the voters yet.
3. The City should consider changing accounting and financial reporting of the Cemetery fund from enterprise fund to governmental activity as the service cannot realistically be self-supporting and requires general fund support. (For comparison, the Davis Cemetery District received $237,713 in FY 2016/17 property tax revenue and the Winters Cemetery District received $137,774 in FY 2016/17 property tax revenue, within their respective city limits.)	The City may have considered this, but the cemetery still operates as an enterprise fund.
4. Provide any City contracts for building/fire plan check & inspection, fleet maintenance, park/landscape maintenance and arborist/tree maintenance services (per LAFCo's March 23, 2018 memo), to allow LAFCo to compare contractors and rates with the other cities and Yolo County for shared services opportunities.	Completed.
5. Strive to continue with the City's recent practice of completing audits within 6 months and no more than 9 months from the end of the fiscal year.	Audits are still being adopted later than recommended by best practices.

Status of Previous MSR Recommendations Determination

From the City's previous 20149 MSR, it still needs to update its storm drainage fees, consider making the city cemetery a regular governmental activity (because it is unrealistic that it be sustained by fees alone), and turnaround the City's audits more quickly.

Recommendation(s)

None.

SPHERE OF INFLUENCE STUDY

On the basis of the Municipal Service Review:

☒ Staff has reviewed the agency's Sphere of Influence and recommends that a SOI Update is NOT NECESSARY in accordance with Government Code Section 56425(g). Therefore, NO CHANGE to the agency's SOI is recommended and SOI determinations HAVE NOT been made.

☐ Staff has reviewed the agency's Sphere of Influence and recommends that a SOI Update IS NECESSARY in accordance with Government Code Section 56425(g). Therefore, A CHANGE to the agency's SOI is recommended and SOI determinations HAVE been made and are included in this MSR/SOI study.