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To: lafco; Mark Bramfitt
Subject: Public comment for Oct 7, 2026 LAFCO item on proposed Alexander Valley Water District
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EXTERNAL

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Public comment for Oct 7, 2026 LAFCO item on proposed Alexander Valley Water District (AVWD)

I urge the LAFCO Board to vote no on reconsidering and approving an AVWD. I have submitted multiple public comments to the LAFCO Board on the AVWD item and they are on record for your reference, in particular ones that challenge the request for reconsideration, and the quest for increasing water supply in a time of diminishing resources.

It is reasonable to ask LAFCO legal counsel to address what looks like a clear financial conflict of interest by Board member John Gorman. Mr. Gorman works for a vineyard in Alexander Valley. Is that vineyard in the Russian River Property Owners Association? Does Mr. Gorman effectively work for the petitioners and/or the petitioner's interests? If so, he should recuse and any previous AVWD vote he made should have that hearing re-done.

Regardless of political flavor, no local jurisdictions with government-chosen Boards and Commissions willingly create lop-sided entities that only represent one ideological interest. Strong efforts are made in all County jurisdictions for broad representation and inclusion of diverse opinions.

LAFCO should not be king makers and enfranchise wealthy, powerful special interests over other stakeholders in the same geographic area for a proposed special district. Either proposed districts should be enlarged to include clear common stakeholders, the Spring be included in the Sonoma Mountain Community Services District, for example. Lack of meaningful special district inclusion of valid stakeholders in a common area should be grounds for LAFCO disapproval.

Groundwater is at once a private property right *and* a common pool resource. All sustainability and democracy arguments hinge on the inclusion of common pool resource points.

In the case of the AVWD petition, it is more reasonable to have Cloverdale, Healdsburg, the County, environmental interests, small farmers, farm labor, and all rural residential properties in an AVWD, each with a Board seat.

If management of Alexander Valley water use is such a good idea, the LAFCO Board should require that all relevant stakeholders form a special district together.

I suggest LAFCO deny the petition, deny the request for reconsideration, and **direct the Russian River Property Owners Association to come back in a year *from the date of the last hearing***. Come back with a plan that includes:

- no political lobbying, stay in their own lane
- confine all activity within the district boundary and within existing water rights

- promise scientific, sustainable, measurable, water management (see four specific bullet points below)
- have a democratically elected AVWD Board with all relevant local stakeholders
- not impact local streams or adjacent city's water supply
- not meddle in Potter Valley, ERPA business
- if a Lake Sonoma-to-Cloverdale pipeline is built, that a regional JPA be created so that all local beneficiaries can have an equal seat at the table for how that water will be apportioned.

There's no room at the regional table to make new demands on supply. If ag businesses feel they can't prosper except with business-as-usual water (BAU) use but surface supply is increasingly uncertain, this leaves few options. The main options are: lean on deep aquifer pumping, use aquifer storage and recovery (ASR) to offset that pumping, and/or build storage.

In my estimation, ASR is untenable and will not work. See my reasoning below. (1) Unless large storage facilities are built, BAU dep aquifer pumping will result in a race to the bottom. LAFCO needs to take a stand against race to the bottom, which is illogical and inefficient.

Business as usual is unsustainable for Sonoma County's groundwater. Human-caused climate change is driving increasing wet and dry cycles, causing water shortages along the Upper Russian River that impact the entire county.

In response, all County entities are scrambling to drill deep aquifer wells to guarantee more supply. However, relying on deep pumping without a viable recharge plan risks duplicating Central Valley unsustainable practices done by California Water Districts. Deep aquifers are finite resources that require 100s to 1000s of years to recharge naturally. If part of LAFCO's charge is to oversee the creation of logical and efficient service provision of water districts, an AVWD has many unanswered questions. Putting the petition off for a year makes sense. LAFCO should require the following in that time.

- A surface aquifer study to measure how long water takes to cycle back to the river.
- A science-based model of Alexander Valley's hydrology and hydrogeology.
- A clear, transparent mechanism to measure and publicly report surface and deep aquifer drawdown
- A pragmatic study of the feasibility of ASR

Conclusion

I've given good reasons and strong arguments to vote no and deny the AVWD reconsideration. I'm for inclusive, democratic, science-based, verifiable, conservation-oriented water management. I suggest to **have the AVWD petitioner cohort come back in a year from the date of the last hearing meeting. Allow time for water management entities to do studies that will give the LAFCO Board more of an objective basis for a serious regional water management decision. Come back in a year with a more solid plan that addresses the many serious considerations an AVWD brings up.**

Just because a petitioner applies and really wants a special district does not *ipso facto* mean LAFCO Board members should succumb to that pressure and threats of lawsuits when serious

questions about water management logic and efficiency remain unanswered.

(1)

ASR is a false solution and not realistic in AVWD for a variety of reasons. While ASR is a good idea in principle, in SoCo ASR is all talk and no action. No one has banked water from wet periods for a future drought. Nothing is on the immediate ASR horizon for implementation despite 10+ years of talk and planning. Why not?

One, putting dirty flood water or muddy Winter river water down an ASR well is not allowed. Permit Sonoma won't allow it. GSAs won't allow it. Settled, clean, and possibly even treated water must be used and the specific ASR system then tested for negative impacts to the deep aquifer, for example if injected water mobilizes arsenic, boron, or other COCs or constituents of concern.

Two, where will AVWD entities get clean water for ASR recharge? From Healdsburg or Cloverdale? Geyserville is on well water. Doubtful that local municipalizes with water issues already and on well water themselves would bail out Alexander Valley ag's water needs. It does not appear that Alexander Valley has a source of clean or treated water to use in ASR.

Three, the cost of delivered, treated water is too high anyway and this has stalled ASR dead in its tracks in the whole county. It's not economically feasible which is why cities have chosen to drill more wells rather than to proceed with ASR. Will an AVWD pay market rate prices for delivered water when they can pay orders less for their own groundwater?

Four, it would take years to get an AVWD ASR project permitted, to ensure the deep aquifer there would not be negatively impacted and to address issues of cost and benefit.

Five, who would pay for the ASR project? As petitioned, an AVWD Board would assess all Alexander Valley landowners to pay for an ASR project that will realistically only benefit the biggest landowners i.e., where the ASR well or wells would be located. One ASR well ready to go would be $3 million plus.

Six, for all the assessed landowners to benefit from any AVWD ASR or above-ground storage project, there would have to be distribution pipes all over so all assessed landowners could get their fair share. The cost of piping would be high to very high. Since the cost of ASR in aggregate is already too high for the benefits it produces, such a piping delivery system likely won't happen. How long until the assessed AVWD landowners realize they are getting the sucker's payoff, i.e., paying for nothing?

Seven, surface aquifer ASR in Alexander Valley is not feasible in wetter times when there is extra water to recharge. Why? The surface aquifer is already full. (Alluvial surface aquifers tend to be naturally sustainable.) Because the Alexander Valley surface aquifer is hydrologically connected to the Russian River, when the river is low, surface aquifer groundwater leaks quickly back into the river. The feasibility of surface recharge needs to be tested with an isotope tracer study as a condition of approval.

Eight, over-pumping of the Alexander Valley surface aquifer will negatively impact groundwater dependent ecosystems and small well owners. Since the proposed AVWD Board will have no independent environmental or rural residential interest seat, these groups will have to bring lawsuits to see that the County General Plan Water Resources Element is conformed to. Should the LAFCO Board approve an AVWD, public, bi-annual independent monitoring and measuring of surface and deep aquifer groundwater water levels needs to be a hard condition of approval.

Nine, this all adds up to that Alexander Valley deep aquifer pumping to offset loss of Russian River surface water supply can't be offset by ASR for the reasons stated above. Yet, ag interests will feel forced to pump deep aquifer groundwater anyway if they want business as usual levels of water use. This brings potential for an unsustainable race to the groundwater bottom by known anti-regulatory actors that will eventually force DWR to declare Alexander Valley an at-risk basin and require GSA formation. Such a GSA would necessarily include Cloverdale, Healdsburg, rural residential property owners, environmental interests, disadvantaged community interests etc. LAFCO might consider denying the petition and recommend instead of an AVWD, a regional water JPA with the above players in lieu of a GSA, since Alexander Valley is not currently an at-risk basin. If Alexander Valley water management is a good idea, get all the stakeholders at the table.

Ten, national and international corporate landowners (which the biggest Alexander Valley landowners are, see my previous LAFCO comments) tend to put investor returns above all and will require unsustainable resource use to meet short-term profit goals. Corporate profit seeking is the antithesis of sustainable. Market forces will undertake unsustainable practices and make DWR eventually declare Alexander Valley an at-risk basin. Is this a logical and efficient scenario for LAFCO to approve?

"We don't know where we're going but we have to stick together in case somebody gets there."
Ken Kesey

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