Sonoma County Local Agency Formation Commission
111 Santa Rosa Avenue, Suite 240
Santa Rosa, CA 95404

July 20, 2026

RE: Opposition to Formation of the Proposed Alexander Valley Water District as proposed

Dear Chair and Commissioners:

On behalf of West Sonoma County Rural Alliance, we appreciate the opportunity to comment on the proposal to form the Alexander Valley Water District ("AVWD").

We recognize the significant water management challenges facing Alexander Valley and support efforts to improve long-term planning, coordination, and stewardship of local water resources. The issue before the Commission, however, is not whether improved water management is desirable, but whether the proposed governmental structure is the appropriate institutional vehicle for accomplishing those objectives.

Formation of a special district creates a permanent governmental entity that will likely exercise public authority for generations. Accordingly, the governance structure approved should be commensurate with the responsibilities that entity has requested and is expected to undertake in the future. As currently proposed, we do not believe the AVWD meets that standard.

The Proposed Governance Model Is Not Appropriate for the Proposed District's Intended Functions

The issue before LAFCO is not whether a landowner-voter district is legally permissible. The governance model, as proposed is not appropriate for the public responsibilities this proposal seeks to assign to the proposed district.

The proposal before the Commission contemplates a substantially broader institutional role. According to the Plan for Service, the AVWD may participate in regional water planning, groundwater management, groundwater recharge, water-sharing programs, conservation initiatives, watershed wide programs, watershed restoration, and potentially future groundwater

sustainability responsibilities. Those activities extend beyond the management of property interests as proposed to serve on the District Board, and involve interconnected water resources that affect domestic well users, neighboring jurisdictions, downstream communities, fisheries, public trust resources, and the broader Russian River watershed.

Although California law recognizes landowner-voter districts, that recognition reflects a legislative judgment that different governmental functions may warrant different governance structures. It does not relieve the Commission of its responsibility under Government Code section 56668 to determine whether the proposed governance model is appropriate for this particular district.

The Proposed Voting Structure Concentrates Political Authority Only Among the Largest Landowners

The proposal raises concerns about allocating political influence based on the amount of land owned, including property improvements, and how that discrepancy could result in disproportionate harms to other district members.

The proposal therefore does more than limit participation to landowners—it concentrates decision-making authority among the district's largest landowners. Yet the district's decisions will affect all landowners and residents within its boundaries, including owners of smaller parcels, rural residents, leaseholders and domestic well users whose water supplies, property interests, and financial obligations may be directly affected by district policies. Decisions regarding groundwater management, conservation priorities, infrastructure investments, recharge projects, assessments, regional planning, and future district programs may therefore be disproportionately influenced by a relatively small number of large landowners despite affecting a much broader community.

The issue is not simply who may vote, but how political influence is distributed among those subject to the district's governance. By weighting votes according to acreage ownership, the proposal creates a governance structure in which representative participation decreases as the consequences of district decisions become more broadly shared. This allocation of political authority within a public agency and over crucial water decisions would establish a system where a select few wield disproportionate control and can impose widely disparate impacts.

The Proposed Boundaries Extend the District's Influence Beyond Those Represented in Its Governance

The governance concerns do not end at the district's proposed boundaries.

The Department of Water Resources has both defined and identified the Alexander Valley Groundwater Basin in Bulletin 118 as an interconnected hydrogeologic system. The proposed district, however, encompasses only a portion of that basin while contemplating groundwater management, recharge, watershed restoration, and other activities that inherently affect interconnected surface and groundwater resources extending beyond district boundaries.

The significance of this mismatch is not merely technical. Governmental boundaries determine who participates in district governance, while hydrologic boundaries often determine who experiences the effects of district decisions. Where those two boundaries diverge, questions naturally arise regarding whether those affected by district actions have meaningful opportunities for representation. Consequently, neighboring landowners, local governments, domestic well users, downstream communities, and other watershed stakeholders may experience the effects of district decisions despite having no representation in district governance. The district's proposed sphere of influence would therefore extend beyond the communities represented by its governing body.

Government Code section 56668 directs the Commission to evaluate, among other considerations, the logical formation of boundaries, the interests of affected communities, and whether a proposal serves the public interest. Those considerations are directly implicated where a district's anticipated responsibilities extend beyond the boundaries of the electorate empowered to govern it, like here.

This proposal presents two related representational concerns. First, within the proposed district, political influence would be concentrated among the largest landowners despite district decisions affecting a much broader community of landowners, residents, and domestic well users. Second, beyond the district's boundaries, the proposal contemplates activities capable of affecting interconnected water resources and neighboring communities that would have no representation in district governance. That mismatch between governmental influence and public representation is precisely the type of institutional question the Legislature entrusted to LAFCO when evaluating proposals to create new governmental entities.

Water resources may be interconnected, but public accountability should not become disconnected from the communities affected by governmental decisions. The broader the district's proposed responsibilities become, the broader its representative governance should become. As currently proposed, the AVWD moves in the opposite direction.

For these reasons, we respectfully urge the Commission to deny the proposal unless and until a governance framework is developed that more appropriately aligns representative government with the scope of the district's intended authorities and functions.

Thank you for your consideration.

Respectfully submitted,

Dee Swanhuyser, Chair
West Sonoma County Rural Alliance

CITY OF
CLOVERDALE

Dear Chair and Members of the Commission,

Thank you for the opportunity to submit comments regarding the proposed formation of the Alexander Valley Water District (AVWD). With the proposed decommissioning of the Potter Valley Project, northern Sonoma County faces an unprecedented water supply crisis. Cloverdale recognizes that the creation of special district can provide our agricultural neighbors with a necessary mechanism to collectively fund infrastructure, manage interior water shortages, and partner in regional solutions. However, we share many of the serious concerns raised the Commission and its staff throughout the process about the proposed application.

Cloverdale shares a hydrologic footprint with the proposed district, and may be significantly impacted by its creation. If the Commission decides to approve the proposal, we strongly urge the commission to make approval contingent upon the strict compliance with the following terms and conditions:

Confirm Exclusion of Cloverdale From District

We understand that the written application identifies that the City of Cloverdale and its sphere of influence are excluded from the boundaries of the proposed AVWD. However, the quality of the draft maps makes this difficult to confirm. The resolution of approval should explicitly exclude these areas from AVWD's boundaries.

Support for the Independent GSA Prohibition

Cloverdale strongly supports the language prepared by LAFCO Staff regarding Groundwater Sustainability Agency (GSA) participation and management. A successful GSA requires cooperation and coordination from all users, and must be based on the needs of the basin. Allowing the proposed AVWD to potentially act as a GSA raises numerous concerns about institutional capacity and fairness.

Additionally, while the City does not take a position about whether or not AVWD should be permitted to utilize a landowner-voter system, allowing an agency with such structure to serve as the GSA potentially sidelines the needs of residential uses and raises numerous concerns regarding equity.

We fully support the binding condition as written by LAFCO staff:
"The District is authorized to participate in a Joint Powers Authority that would act as the Groundwater Sustainability Agency (GSA) for the two groundwater basins... The District shall not act as a GSA in any capacity, except as a member of a Joint Powers Authority."

Restriction on Extraterritorial Operations.

The proposed District requests the right to contract for and distribute an allocation of imported water to its interior agricultural users, and to seek surface water and groundwater storage opportunities to serve properties within the District. However, Cloverdale opposes the AVWD's proposal to allow it to "to serve properties outside the District that are served by existing pipelines, reservoirs and wells within the District." We request such language be removed from any resolution of approval.

At this time, there are no details about the amount of imported water AVWD would seek, the storage facilities it intends to build, the scope of existing infrastructure serving properties outside the District, or the volume of water needed to serve those properties. If the proposed AVWD is approved, the District should return in the future with a more detailed proposal and seek approval from LAFCO for such extraterritorial services at that time when it can be properly reviewed.

Recognition of Subbasin Interconnectivity and Data-Driven Stewardship

While the City of Cloverdale and our immediate Sphere of Influence are technically excluded from the AVWD boundary map, our municipal wells pull from the exact same Cloverdale Area Subbasin. Pumping and recharge activities on one side of an arbitrary boundary line directly alter the water tables on the other. As a municipality heavily reliant on long-term water security, Cloverdale takes its responsibility as a manager of our shared groundwater subbasin seriously. Our recently adopted Urban Water Management Plan outlines a highly responsive system that positions the City as an exemplary steward of this vital shared resource. Cloverdale is a fully metered system-wide, from our primary production facilities down to individual customer connections. We have also upgraded our infrastructure to a cloud-based Advanced Meter Infrastructure (AMI).

This technology grants us near real-time data transparency, allowing us to continuously monitor unconstrained customer demands and immediately quantify usage against our conservation goals. Because we can detect trends instantly, the City possesses the unique capability to dynamically adjust our shortage response actions. We can intensify outreach or scale compliance enforcement the moment subbasin stress is detected. By actively maintaining a precise, data-driven balance between customer demand and available physical supplies, Cloverdale ensures that our municipal operations do not overdraw or negatively impact the shared aquifer footprint we share with our neighbors in the unincorporated valley.

In light of the combined use of this subbasin, we encourage the newborn district to embrace similar data transparency protocols to ensure responsible use of shared water resources, and ensure that future AVWD operations do not inadvertently disrupt the municipal supplies our residents depend on.

On behalf of the City of Cloverdale, we respectfully request that the Commission approve the formation proposal only if these exact, protective terms and conditions remain fully intact.

From:	Carol Sklenicka
To:	Mark Bramfitt; Verne Ball; Kasandra Bowen
Cc:	Kate Fenton; Norma Jellison; Michelle Irwin
Subject:	Opposition to Formation of the Proposed Alexander Valley Water District as proposed
Date:	Monday, July 20, 2026 9:38:37 PM

July 21, 2026

Sonoma County Local Agency Formation Commission
111 Santa Rosa Avenue, Suite 240
Santa Rosa, CA 95404

RE: Opposition to Formation of the Proposed Alexander Valley Water District as proposed

Dear Chair and Commissioners:

On behalf of Friends of Jenner Creek, we appreciate the opportunity to comment on the proposal to form the Alexander Valley Water District ("AVWD"). We recognize the significant water management challenges facing Alexander Valley and support efforts to improve long-term planning, coordination, and stewardship of local water resources. The issue before the Commission, however, is not whether improved water management is desirable, but whether the proposed governmental structure is the appropriate institutional vehicle for accomplishing those objectives.

Formation of a special district creates a permanent governmental entity that will likely exercise public authority for generations. Accordingly, the governance structure approved should be commensurate with the responsibilities that entity has requested and is expected to undertake in the future. As currently proposed, we do not believe the AVWD meets that standard.

The Proposed Governance Model Is Not Appropriate for the District's Intended Functions

The Cortese-Knox-Hertzberg Local Government Reorganization Act ("CKH Act") recognizes that California employs different models of district governance. Government Code sections 56049 and 56050 define landowner-voter districts, while section 56072 separately defines registered-voter districts. Government Code section 56065 further provides that a district's governance structure is determined by its principal act.

Together, these provisions recognize that different governmental functions may warrant different governance structures. The issue before LAFCO is therefore not whether a landowner-voter district is legally permissible. Rather, it is whether that model of governance is appropriate for the public responsibilities this proposal seeks to assign to the district.

The proposal before the Commission contemplates a substantially broader institutional role. According to the Plan for Service, the AVWD may participate in regional water planning, groundwater management, groundwater recharge, water-sharing programs, conservation

initiatives, watershed wide programs, watershed restoration, and potentially future groundwater sustainability responsibilities. Those activities extend beyond the management of property interests as proposed to serve on the District Board, and involve interconnected water resources that affect domestic well users, neighboring jurisdictions, downstream communities, fisheries, public trust resources, and the broader Russian River watershed.

Although California law recognizes landowner-voter districts, that recognition reflects a legislative judgment that different governmental functions may warrant different governance structures. It does not relieve the Commission of its responsibility under Government Code section 56668 to determine whether the proposed governance model is appropriate for this particular district.

The Proposed Voting Structure Concentrates Political Authority Among the Largest Landowners

The proposal also raises concerns about allocating political influence based on the amount of land owned, including property improvements, and how that discrepancy could result in disproportionate harms to other district members.

The proposal therefore does more than limit participation to landowners—it concentrates decision-making authority among the district's largest landowners. Yet the district's decisions will affect all landowners and residents within its boundaries, including owners of smaller parcels, rural residents, leaseholders and domestic well users whose water supplies, property interests, and financial obligations may be directly affected by district policies. Decisions regarding groundwater management, conservation priorities, infrastructure investments, recharge projects, assessments, regional planning, and future district programs may therefore be disproportionately influenced by a relatively small number of large landowners despite affecting a much broader community.

The issue is not simply who may vote, but how political influence is distributed among those subject to the district's governance. By weighting votes according to acreage ownership, the proposal creates a governance structure in which representative participation decreases as the consequences of district decisions become more broadly shared. This allocation of political authority within a public agency and over crucial water decisions would establish a system where a select few wield disproportionate control and can impose widely disparate impacts.

The Proposed Boundaries Extend the District's Influence Beyond Those Represented in Its Governance

The governance concerns do not end at the district's proposed boundaries.

The Department of Water Resources has both defined and identified the Alexander Valley Groundwater Basin in Bulletin 118 as an interconnected hydrogeologic system. The proposed district, however, encompasses only a portion of that basin while contemplating groundwater management, recharge, watershed restoration, and other activities that inherently affect interconnected surface and groundwater resources extending beyond district boundaries.

The significance of this mismatch is not merely technical. Governmental boundaries determine who participates in district governance, while hydrologic boundaries often determine who experiences the effects of district decisions. Where those two boundaries diverge, questions naturally arise regarding whether those affected by district actions have meaningful opportunities for representation. Consequently, neighboring landowners, local governments,

domestic well users, downstream communities, and other watershed stakeholders may experience the effects of district decisions despite having no representation in district governance. The district's proposed sphere of influence would therefore extend beyond the communities represented by its governing body.

Government Code section 56668 directs the Commission to evaluate, among other considerations, the logical formation of boundaries, the interests of affected communities, and whether a proposal serves the public interest. Those considerations are directly implicated where a district's anticipated responsibilities extend beyond the boundaries of the electorate empowered to govern it, like here.

This proposal presents two related representational concerns. First, within the proposed district, political influence would be concentrated among the largest landowners despite district decisions affecting a much broader community of landowners, residents, and domestic well users. Second, beyond the district's boundaries, the proposal contemplates activities capable of affecting interconnected water resources and neighboring communities that would have no representation in district governance. That mismatch between governmental influence and public representation is precisely the type of institutional question the Legislature entrusted to LAFCO when evaluating proposals to create new governmental entities.

Water resources may be interconnected, but public accountability should not become disconnected from the communities affected by governmental decisions. The broader the district's proposed responsibilities become, the broader its representative governance should become. As currently proposed, the AVWD moves in the opposite direction.

For these reasons, we respectfully urge the Commission to deny the proposal unless and until a governance framework is developed that more appropriately aligns representative government with the scope of the district's intended authorities and functions.
Thank you for your consideration.

Respectfully submitted,
Kate Fenton, Norma Jellison, Michelle Irwin, Carol Sklenicka
Founding Members
Friends of Jenner Crek

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.