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LAFCO
Sonoma County
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Dear Sonoma County LAFCO,

Thank you for the opportunity to submit comments for the “Alexander Valley Water District Formation” (AVWD). The mission of the Sierra Club Redwood Chapter Water Committee is to preserve and protect the water resources of the Redwood Chapter Region to include all surface, ground water, watersheds and outflow points and marine waters therein while ensuring their quantity and quality. The Redwood Chapter Water Committee works with legislators, state and local agencies and industrial/agricultural users to ensure that all Chapter water resources receive environmentally and socially sensitive management.

The Russian River was declared fully appropriated in 1998; consequently, it is valuable to consider a portfolio of local initiatives for water supply resiliency options. We have some concerns regarding the formation of an Alexander Valley Water District as proposed that have to do first with equitable representation of all land owners and well users in the area; secondly, the proposed district boundaries are inconsistent with water management - either as a watershed or as GSA; and, thirdly also related to water management, is the proposed construction of electrically powered wells along the Russian River.

The first concern we listed regarding equitable representation relates to LAFCO’s statutory responsibilities under the Cortese-Knox-Hertzberg Local Government Reorganization Act (CKH), which includes the adequacy of governance, representation, service feasibility, and impacts on the public interest and natural resources. The description in the application of governance structure does not provide good enough clarity on future representation or on the extensive authorities unless everything is decided by the elected Board of Directors. There should be clarity and equal representation for decisions on changes, and on priorities. The proposal stipulates that the Board of Directors are to be elected by large landowners and hold ultimate control:

“The Board of Directors will have ultimate discretion over the services delivered and priorities for their implementation.”

“The selection and phasing of program implementation will reflect the priorities of the Board of

Directors as may be influenced by established intergovernmental cooperation and terms of related agreements.”

As it has been explained, there will be a slate of Directors proposed by the current organizing group offered to those eligible to vote. Others can run, but it would seem independent candidates could be disadvantaged. Will all the landowners (and/or leaseholders/tenants) be included in all decisions, including small parcel owners? Will they be consulted? Representation and protections of smaller landowners and domestic well owners must be explicitly spelled out, since the initial governing body appears to favor larger land holders. Domestic wells and smaller parcels typically have shallower wells which need equal representation, including affordable and adequate data collection to provide equal protections and opportunities. Small land holders should not bear the expense of impacts caused by others.

Our second query re: the application has to do with the proposed district boundaries not being consistent with water management either as watershed or GSA basin as described in Bulletin 118:

“The upland areas of the Alexander Area Subbasin, the Chalk Hill area, and the Mark West Creek watershed, are proposed to be excluded from the AVWD because these areas lack a sufficient nexus with the mainstem Russian River and its interconnected groundwater.”

The described boundaries raise several hydrologic and governance concerns. Upland and municipal areas can materially affect groundwater levels, recharge dynamics and Russian River flows. The proposed district boundary as described is limited to the valley floor, explicitly not including upland and southernmost portions of the Alexander Valley Basin, cities and other jurisdictions which rely upon the same interconnected surface and groundwater. This limits ability to monitor and consider downstream and cumulative impacts of water use and management decisions, which will be required should a SGMA basin be formed, for example as a Groundwater Sustainability Basin. Downstream effects on users, groundwater wells connected to the basin but outside the AVWD boundary, instream conditions, and public trust resources beyond the proposed district boundary are not included for data collection or evaluation. Nor is there a described process for unbiased review, analysis or enforcement should mitigations be necessary. This needs to be addressed.

A third concern we have has to do with the Groundwater Recharge Program which states that the Dry Creek Rancheria Band of Pomo Indians received a grant. It involved application of Russian River surface water to vineyards: Surface water will be extracted from new electrically powered shallow wells along the Russian River and pumped through a conveyance system to participating properties where the diverted water will be applied to land via existing water application infrastructure.

How this is managed can make a big difference to uses reliant on water downstream (dependent on the location and extraction of new wells) and to those not on the “participating” list. Real time groundwater metering and reporting would help - especially in sustainability planning. Seasonal and/or drought conditions can only be well managed with real time data and

reporting, which is not included. There is no description of cumulative impacts to downstream users or to Public Trust issues.

One final question regarding the AVWD application-- who exactly supports this proposed District, and/or who exactly have they met with and are working with. It was broadly stated that the urban areas, the tribes, and the community are in full support, but no specific municipalities or groups were named.

Sierra Club Redwood Chapter Water Committee recommends that in considering a newly formed Water District, that these and other issues of Public Trust are addressed formally prior to approval.

Thank you for your consideration.

Theresa Ryan
Chair, Water Committee
Redwood Chapter of the Sierra Club