



STAFF REPORT

Agenda Item No. 5a	
MEETING DATE	October 5, 2026
MEETING BODY	Mendocino Local Agency Formation Commission
FROM	Uma Hinman, Executive Officer
SUBJECT	Public Hearing for Mendocino County Russian River Flood Control and Water Conservation Improvement District Annexation of Redwood Valley County Water District Service Area (File No. A-2025-05) and Findings Pursuant to the California Environmental Quality Act

RECOMMENDED ACTION

The Commission:

- 1) Acting as a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), find as a Responsible Agency, it has independently reviewed and considered the Negative Declaration (SCH No. 2025061147) adopted by RRFC, and that the Negative Declaration is adequate for the Commission's action; and
- 2) Adopt LAFCo Resolution 2026-27-04, conditionally approving the RRFC Annexation of RVCWD Service Area (LAFCo File No. A-2025-05).

BACKGROUND

This item is consideration of a proposed Change of Organization for the Mendocino County Russian River Flood Control and Water Conservation Improvement District (RRFC) Annexation of Redwood Valley County Water District (RVCWD) (File No. A-2025-05).

RRFC proposes under Resolution No. 25-07 to annex the portion of the RVCWD service area not already within the RRFC boundary, approximately 9,610 acres (Attachment 2), in cooperation with RVCWD under its Resolution No. 25-02 (Attachment 3). While enabling RVCWD to use RRFC contract water throughout its entire service area, the proposal would not consolidate or dissolve RVCWD.

The application submittal was accepted for filing and deemed ready for Commission consideration according to the Certificate of Filing issued on September 14, 2026.

Application Materials

The following application submittal materials are available online for further information:

- [Application Form](#)
- [RRFC Resolution of Application](#)
- [RVCWD Resolution of Support](#)
- [Plan for Services](#)
- [CEQA Negative Declaration](#)
- [Annexation Map and Legal Description](#)

- [List of Assessor Parcel Numbers \(APNs\)](#)
- [RRFC Sphere of Influence \(SOI\) map](#)

Purpose of the Proposal

The purpose of the proposed annexation is to allow the RVCWD to put contracted and surplus water available under its existing Uniform Water Sale & Purchase Agreement (purchase agreement) with RRFC to beneficial use anywhere within the RVCWD service area, not just that portion currently within the RRFC boundary.

As shown in Attachment 1, a small area of approximately 200 acres in the southern portion of RVCWD is currently within the RRFC boundary and is referred to as the overlap area.

Below are some summary highlights of the proposed annexation outcomes:

- Enable RVCWD to use its contractual allocation of RRFC water throughout its entire service area.
- Allow RVCWD to become an in-district RRFC customer.
- Enable RVCWD to access surplus water as an in-district RRFC customer, providing access sooner than is currently available.
- Enable RVCWD to request water that becomes available for contract with other in-district RRFC customers.
- Create operational flexibility for RVCWD to distribute water, especially during water supply shortages.
- Enhance overall service delivery through improved operational efficiency and lower operating costs.
- Align RRFC's jurisdictional boundary with RVCWD's existing service area and RRFC's licensed place of use.
- Allow RRFC to more reliably put its licensed water to beneficial use.

History

The concept of consolidating or annexing RVCWD with RRFC has been discussed off and on since at least 1999 to establish secure water supplies between May and November each year when RVCWD has no guaranteed water rights. Over this time, many challenges and concerns surfaced, such as whether RRFC has sufficient water for RVCWD needs, ability to serve water outside the place of use, and RVCWD's high outstanding debt obligations to the U.S. Bureau of Reclamation that restrict RVCWD's ability to secure loans for infrastructure upgrades and has contributed to long-standing moratoriums on new domestic and irrigation connections.

In 2011, RRFC and RVCWD signed a Memorandum of Agreement (MOA) in pursuit of consolidation. In 2014, progress was made toward an annexation and dissolution of RVCWD before the districts jointly concluded it was not a viable option. In 2019, RRFC once again began to explore how to elevate the customer status of RVCWD from surplus only. An Agreement to Terms of Service was developed by a joint Ad Hoc Committee and approved by both Districts. The agreement lays out the terms under which RRFC provides surplus water to RVCWD.

The Mendocino County Grand Jury Final Report of June 29, 2022 on "[Redwood Valley County Water District 48 Years of Water Insecurity](#)" included a recommendation that the RVCWD immediately pursue all avenues towards consolidation with local water districts to obtain secure access to sufficient water rights to meet the health and safety needs of the RVCWD domestic, commercial, and agricultural customers. It is noteworthy that consolidation often involves more significant challenges to address than annexation; reaching and maintaining consensus amongst multiple agencies requires a solid dedication of staff time and resources over a long time period.

In early 2024, RVCWD and RRFC resumed the collaboration toward annexation. On April 1, 2024, RRFC adopted Resolution No. 24-01, a *Commitment to Collaborate with Redwood Valley County Water District in Developing a Local Agency Formation Commission Annexation Application* and on April 18, 2024, the RVCWD adopted Resolution No. 24-01 of the same title. On August 1, 2024, RRFC and RVCWD entered a Memorandum of Understanding (MOU) regarding the development of an annexation application to LAFCo, including a cost sharing agreement. This latest attempt has resulted in this annexation application.

RRFC

Russian River Flood Control (RRFC) provides wholesale water from the East Fork Russian River and Lake Mendocino under the terms of its State Water Resources Control Board (SWRCB) issued water right license 13898. RRFC is

authorized to divert 7,940 acre-feet (AF) a year for beneficial use within the RRFC licensed Place of Use, which includes the entire RVCWD jurisdictional boundary.

RRFC offers water sales contracts to water users within its boundaries through a Uniform Water Sale and Purchase Agreement. The water is diverted and sold as raw (untreated) water to customers for municipal water service uses, private agricultural entities for irrigation and frost protection purposes, and to others for industrial and domestic use.

The quantity of water contracted to RRFC customers remains relatively steady. On an annual basis, RRFC customers may voluntarily offer to make some or all of their unused contract quantity available as surplus to other RRFC customers first. At that point, any remaining RRFC license water that is not put to beneficial use (surplus water) may be made available to RVCWD per the conditions of a 1980 Stipulated Judgement between RRFC and RVCWD.

Currently, there is a 200-acre area of overlap between the RRFC and RVCWD jurisdictional boundaries, and RVCWD has a Uniform Water Sale and Purchase Agreement with RRFC for 328.85 AF annually to serve this area. The proposed annexation would provide an opportunity for RVCWD to expand the territory within which this purchase agreement water may be used to the entire RVCWD jurisdictional boundary, in addition to receiving other in-district customer benefits.

RVCWD

Redwood Valley County Water District (RVCWD) was established on January 16, 1964 under Water Code (WAT) §§ 30322 and 30323. RVCWD has a dual distribution system; the irrigation water service began in April 1979 and the domestic water service began in November 1979.

According to the 2016 Redwood Valley CWD Sphere of Influence Update, RVCWD delivers approximately 750 acre-feet per year (AFY) for residential and commercial uses, and 1,450 AFY for agricultural purposes, for a combined annual demand of 2,200 AFY.

According to the Plan for Services, RVCWD serves a total of 1,105 equivalent dwelling units with domestic water and 197 agricultural customers with irrigation or raw water.

RVCWD has three sources of water supply, with yields that can be highly variable in dry years and droughts.

1. Untreated water is purchased from RRFC, primarily through surplus water supply, and pumped by RVCWD from its Lake Mendocino pump station into agricultural supply lines and to a 68 AF reservoir or holding pond. The intake has physical limitations to pumping when lake elevation is low, around 700 feet, equivalent to approximately 20,000 AF of lake storage. From the reservoir, raw water is gravity-fed to either the RVCWD water treatment plant with a maximum capacity of 1.7 million gallons per day (mgd) and then pumped to six covered steel tanks with a total volume of 1.85 million gallons for municipal supply, or routed to the irrigation distribution system. Raw water can also bypass the reservoir and enter the irrigation distribution system directly. In severe water shortages, the reservoir is reserved for fire suppression needs.
2. Treated municipal water is purchased from Millview County Water District (Millview CWD) surplus groundwater supply via an emergency intertie that bypasses the reservoir and connects directly to the domestic distribution system.
3. RVCWD also holds a largely un-exercisable right to divert up to 4,900 AFA directly from Lake Mendocino between November 1 and April 30 of each year. Water diversions under this right can only occur in instances when stream flows in the Russian River main stem (as measured at the confluence of the East and West forks) exceed 150 cubic feet per second and Lake Mendocino storage is within the flood pool. This represents a relatively narrow window of opportunity and RVCWD has not exercised this right in the last five years. Additionally, in order for this winter-diverted water to be useful to RVCWD, it must be stored and RVCWD's only pond is grossly insufficient in size.

Currently, RVCWD purchases water from both Millview CWD and RRFC that has been determined to be surplus to the ongoing needs of the two respective agencies. RRFC is restricted from providing a reliable water supply source to the entirety of the RVCWD service area under a purchase agreement for two reasons: portions of RVCWD are located outside the RRFC jurisdictional boundary, and RRFC does not currently have sufficient uncontracted water available under its license to meet RVCWD demands. Further, RVCWD sits on a highly limited water aquifer, thereby making groundwater in Redwood Valley an unreliable water supply source.

Millview CWD provides RVCWD with groundwater, which is not regulated by the SWRCB and has no assigned place or purpose of use. The amount of water that can be delivered by Millview CWD to RVCWD is limited by the capacity (overall water volume and flow rates) of the emergency water connection (intertie) which is physically constrained by the pipeline diameter (six-inch sizing in sections), amounting to approximately 55 gallons per person per day (360 AFA, including 10 percent for water loss) to RVCWD municipal customers.

Currently, RVCWD is using under 10 AF of the 328.85 AF contract amount under the RRFC purchase agreement in the 200-acre overlap area, and the remainder is relinquished back to RRFC and eventually becomes available for RVCWD to purchase as surplus water. According to the Plan for Services, RVCWD has purchased an annual average of 850 AF of surplus water from RRFC since 2016, which includes times of supply restriction. During this period, the amount of surplus water RVCWD purchased ranged widely from a low of 278.34 AF in 2022, and a high of 1,583.02 AF in 2020 (Attachment 5). This water is used to serve RVCWD's agricultural customers and as a supplement to the surplus water from Millview CWD for municipal supply. If the SWRCB approves a proposal from the Ukiah Valley Water Authority (UVWA) for infrastructure improvements, the RRFC water available to RVCWD could provide an important redundant source in place for emergencies.

RVCWD agricultural customers depend on the RRFC surplus supply, only augmented by those rare times RVCWD can exercise its own winter water right. The Redwood Valley agricultural community also relies on private surface water storage ponds and groundwater, where available. During a drought, both ponds and wells are at high risk of going dry and farmers then rely solely on water stored in Lake Mendocino under RRFC's water right. Due to water supply availability impacts from intensifying drought conditions and impending changes to the Potter Valley Project, there will be less and less surplus water available to RVCWD from RRFC in future years.

The Potter Valley Project, a trans-basin water diversion system, has diverted water from the Eel River to the Russian River for over a century and is now undergoing a lengthy decommissioning process. A potential new water diversion facility is being considered that would result in substantially less water diverted into the Russian River basin, particularly in the wintertime. The diversion yield would not be stable or guaranteed, especially considering the current lack of storage capacity in the Russian River watershed.

Because of the uncertain water supply, RVCWD is currently under a 1989 court-ordered moratorium for domestic connections and a 2001 district board-initiated moratorium on irrigation connections.

UVWA

In 2024, RVCWD joined the UVWA, a joint powers authority formed in 2024. Members of UVWA include the City of Ukiah, Calpella County Water District, Millview County Water District, Redwood Valley County Water District, and Willow County Water District, creating coordination which aims to modernize water infrastructure and governance while maximizing water access and resilience.

The day-to-day operations of UVWA are managed by City of Ukiah employees, and as of January 1, 2025, all RVCWD operational services were transferred to the City of Ukiah. UVWA is actively working with the SWRCB to obtain funding under the Safe and Affordable Funding for Equity and Resilience (SAFER) program to enhance and secure municipal water supplies which will include improving the municipal water supply services to RVCWD.

It is anticipated that the UVWA will use State funding from the SAFER program to enhance and secure municipal water supplies through consolidation of the JPA member water rights and expanding groundwater pumping and delivery. Infrastructure improvements will include the delivery lines for the RVCWD municipal water supply.

UVWA operates as a functional consolidation of its member water agencies, but was formed as a joint powers authority, not through a LAFCo reorganization. UVWA intends to move forward with formal LAFCo applications for reorganization/consolidation over the next few years.

Water Supply Shortages

RVCWD, RRFC, and the SWRCB have guidelines to address water supply shortages.

RVCWD adopted a Water Conservation Program under Ordinance No. 1 on July 19, 2007 to manage severe drought conditions and limited surface water supplies from Lake Mendocino and the Russian River system. The ordinance includes six tiers, of which the most severe water use restrictions apply to Tier 6.

RRFC governs water sales, allocations, and conservation through Ordinance #25-01 adopted on May 5, 2025 and effective on June 4, 2025, which updated the prior RRFC Ordinance #00-01 *Establishing Regulations & Rules for Water Sales*. RRFC enacts its Water Conservation Program (Article 9 of Ordinance #25-01) when conditions limit the water supply available to its customers. Further, Section 11.2 of RRFC purchase agreements requires pro-rata reductions in contract use in times of shortage as declared by RRFC. RRFC intends to continue its past practice of allocating shortages equally to all customers regardless of water use (i.e. municipal, industrial, agricultural).

Water Code § 106, enacted in 1943, declares it state policy that domestic use is the highest use of water and irrigation the next highest. It is a general policy statement, not an operational rule. The California Supreme Court has held that the policy is not conclusive and that no use of water, including domestic use, has an absolute priority. (*Metropolitan Water Dist. v. Marquardt* (1963) 59 Cal.2d 159, 184–185; *National Audubon Society v. Superior Court* (1983) 33 Cal.3d 419, 447, fn. 30.) Section 106 does not authorize RRFC or RVCWD to curtail agricultural deliveries, and neither agency has relied on it to do so. The statute that governs local drought allocations is Water Code sections 350–358. It applies to RRFC and RVCWD today, whether or not the annexation is approved. Under those sections, a water supplier that declares a water shortage emergency after notice and a hearing must first reserve water for domestic use, sanitation, and fire protection. It may then set priorities for other uses, but without discriminating among customers who use water for the same purpose. (Wat. Code, § 354.) Annexation would therefore not change agricultural customers' position during a shortage. RRFC has historically managed shortages under its contracts, not through state-imposed prioritization of water rights.

Under WAT § 1058.5, the State Water Resources Control Board (SWRCB) can adopt emergency regulations to mandate curtailments, or stop water diversions, when water is unavailable under a holder's priority of right. Emergency regulations under Title 23, California Code of Regulations (CCR) allow for certain diversions to continue even though a curtailment order is in effect. Generally, CCR § 878.1 of the regulations authorize exceptions related to diversions for minimum human health and safety needs of not greater than 55 gallons per person per day without further approval and subject to conditions. Therefore, in unusual or extreme water shortage conditions, the SWRCB has historically allowed diversions for minimum human health and safety needs to continue during curtailment.

Drought

The Redwood Valley and Ukiah Valley regions have experienced several significant droughts in the last 20 years, with the most notable droughts in 2007–2009, 2013–2015, and 2020–2022.

During the 2007–2009 drought, RVCWD Tier 4 was implemented in 2009 when Lake Mendocino water levels receded to record lows. At that time, mandatory rationing was imposed by the SWRCB, which resulted in a 50 percent reduction in water use.

During the 2013–2015 drought, RVCWD Tier 4 was again implemented, resulting in limits of 50 gallons per person per day and no agricultural water deliveries, and RRFC implemented mandatory reductions on District customers of 50 percent and then 25 percent and coordinated an emergency water supply for RVCWD.

During the drought in 2020–2022, Lake Mendocino reached its lowest level since filling and many community members were under strict water rations. The region was under a drought declaration by the Governor of California and the SWRCB ordered emergency regulations resulting in curtailment of Russian River water rights.

During the 2020-2022 drought, RVCWD had limited water supply available for agricultural customers due to a lack of RRFC surplus water available. No water deliveries were made to RVCWD agricultural customers in all of 2021 and most of 2022. The physical limitations of the Millview CWD intertie required RVCWD to ration municipal supply to 55 gallons per person per day.

During the 2020-2022 drought, RRFC declared a Water Supply Emergency when the District determined a major failure of supply and storage, including no surplus water supply to provide to RVCWD. RRFC customers were asked to voluntarily reduce water use and through cooperation were able to continue accessing RRFC stored water in Lake Mendocino, though the SWRCB was close to curtailing that use.

In 2021, RVCWD was eligible to continue diverting water from Lake Mendocino for minimum human health and safety purposes of 55 gallons per person per day. The SWRCB curtailment order identified RVCWD as an Upper Russian River community water system with a population of approximately 5,200; therefore, the curtailment exception was tied to the population of the RVCWD's public water system, not to whether each connection was located inside RRFC's jurisdictional boundary.

Therefore, the proposed annexation would not expand or increase the RVCWD population eligible for a SWRCB minimum human health and safety exception for any future curtailment orders.

Plan for Services

RVCWD currently holds a purchase agreement with RRFC for 328.85 AF for use within RVCWD's approximately 200 acres located within RRFC's jurisdictional boundaries. Annexation of the remaining portion of the RVCWD service area into the RRFC boundary will allow RVCWD to use the contract water supply available under the purchase agreement anywhere in the RVCWD service area.

All infrastructure is already in place and there will be no interruption in the existing services provided to RVCWD. The annexation is not expected to increase RVCWD's historical use of RRFC's license water or induce growth due to regional water supply challenges related to intensifying drought conditions and a significant deficit of water diversion to the Russian River watershed due to impending changes to the Potter Valley Project. RVCWD will continue to use RRFC water as it has for agricultural customers and as an emergency backup for domestic supply until such time as the UVWA expands the groundwater supply and infrastructure.

RVCWD currently pays for water under its RRFC purchase agreement. In addition, it pays for surplus water used from RRFC as per the terms of the 1980 Stipulated Judgement between the two entities. The purchase price of surplus water is determined by dividing RRFC's operational expenses by 7,940, the amount under RRFC's License. RRFC does not budget revenue from the sale of surplus water since it is unknown in any given year. Once annexed, the only financial change is that the cost per AF to RVCWD will be the same as for all RRFC customers under a RRFC purchase agreement, determined by the Board of Trustees through the adoption of fiscal year budgets.

Normally, the Plan for Services (GOV § 56653) for a proposed annexation would demonstrate the ability to provide all necessary municipal services to the annexation area. However, in this case, the annexation would result in an intentional overlap of a water wholesaler district and a water retailer district. This would not be a duplication of services, but would instead result in complementary services, since RVCWD (retailer) relies on the water supply rights of RRFC (wholesaler) to provide municipal services. The proposed annexation would not resolve the RVCWD water supply deficit; it would provide RVCWD customers some relief from water insecurity, but would not be sufficient to provide a reliable water supply, especially in dry years and drought conditions.

Supply and Demand

According to the 2016 Redwood Valley CWD Sphere of Influence Update, RVCWD delivers approximately 750 AF per year for residential and commercial uses, and 1,450 AF for agricultural purposes, for a combined annual demand of 2,200 AF.

According to RRFC's 2016-2025 Reported Water Use data shown in this table (Attachment 5), RVCWD has purchased an annual average of 870 AF of surplus water from RRFC since 2016, which includes times of supply restriction.

Please note the following limitations of this data: (1) water use data is not categorized by customer type, (2) years 2021 and 2022 were under water supply shortages, and (3) the 2025 data is not the final number for that year.

The 2016-2025 RVCWD water use data likely represent a mixture of actual water demand and demand tailored by surplus water availability. It is unknown what the reoccurring total demand would be under reliable supply conditions (in 2016, the total annual demand was estimated to be 2,200 AF). By removing years 2021 and 2022 (water shortage years) and 2025 (incomplete data) from the calculation of average demand per year, the 870 AF annual demand for surplus water increases to 1,015 AF.

This adjusted 1,015 AF annual RRFC surplus water demand should be considered in addition to a possible maximum of 10 AF of RRFC contract water used in the 200-acre overlap area and 360 AF of surplus water from Millview CWD, for an estimated average annual use from these sources in non-shortage years of 1,385 AF per year since 2016.

Year	Surplus Water (AF)
2016	815.92
2017	1,155.14
2018	1,163.83
2019	815.92
2020	1,583.02
2021	513.64
2022	278.34
2023	626.20
2024	949.36
2025	796.26

Upon annexation, RVCWD would have a fully useable contract of untreated water supply in the amount of 328.85 AF, which could be reduced during water shortages by a pro-rata amount according to the RRFC purchase agreement. RVCWD would also continue to have access to approximately 360 AF of treated surplus water from Millview CWD, which would not be reduced during water supply shortages.

In addition, RVCWD would also have access to a highly variable amount of surplus water from RRFC, which can cease entirely during water shortages, especially for agricultural customers. Finally, RVCWD would also have the ability as an in-district customer to request a pro-rata portion of water that becomes available for contract under RRFC's licensed water rights under RRFC Policy 5100 *Allocation of Uncontracted Water*. Uncontracted water does not become available often since many contract holders relinquish unused water in a given year which becomes available as surplus water to other in-district customers for purchase. Currently 46 AF is available to be requested.

Based on the above post-annexation conditions, relatively stable water supplies of 328.85 AF from RRFC contract water and 360 AF from Millview CWD surplus water, totaling 688.85 AF would not come close to providing a reliable water supply to meet a total estimated demand of 1,385 AF per year since 2016, or the 2,200 AF total demand estimated in 2016.

Even when the analysis is limited to domestic (treated) water, the relatively stable water supply of 688.85 AF would fall short of the 750 AF needed in 2016. It therefore would not be sufficient to support additional domestic connections or increased treated water demands.

Growth Potential

The annexation area, which includes nearly the entire Redwood Valley area, is an unincorporated, mixed use rural and agricultural region, with property regulated under the Mendocino County Zoning Code - Division I, which applies to inland areas, and includes the following zoning categories:

- Agricultural (primarily AG-40): For farming, vineyards, and lower-density rural residential uses.
- Rangeland / Forest Land: For larger acreage, conservation, and resource management.
- Residential: Primarily single-family rural residential ranging in size from 1-acre to 10-acres.
- Commercial: Localized commercial/industrial along major roads and Highway 101.

The existing land uses in RVCWD are primarily single-family homes, including three mobile home parks and two Indian reservations; extensive farmland including viticulture (premium wine grapes), orchards, general crop farming, and animal husbandry; and limited support commercial and institutional uses.

Normally, an annexation proposal involving the provision of urban services (i.e., water and sewer service) to residential, commercial, and/or industrial uses would likely result in growth potential. However, in this case, the

annexation would result in an intentional overlap of a water wholesaler district (RRFC) and a water retailer district (RVCWD) that are both already providing services to the annexation area which is already developed and under two moratoriums.

When the court ordered a moratorium on new domestic connections in RVCWD in 1989, it did not establish a defined set of quantitative prerequisites to modify or dissolve the writ of mandate and lift the moratorium. Instead, RVCWD would have to file a motion with the court supported by evidence demonstrating a reliable and adequate supply of potable water under normal and maximum demand conditions that meets the strict standards imposed by California law (Health and Safety Code, Safe Drinking Water Act, and the Human Right to Water law).

According to the Initial Study and Negative Declaration prepared for the project, the purpose of the annexation is to allow RVCWD to utilize its existing water supply under its RRFC purchase agreement in its entire service area, and to have access to surplus water on par with existing RRFC customers. While these changes may offer RVCWD some drought relief, they do not provide increased water supplies, and do not rise to the extent of increased reliability or more dependable water supply for RVCWD. Therefore, the proposed annexation does not provide grounds for RVCWD to apply to the court to lift the court-imposed moratorium on domestic connections, or to justify lifting its self-imposed moratorium on agricultural connections.

The proposed annexation would not create or guarantee an additional water supply; it would make the existing RRFC contract water of 328.85 AF more useful and accessible in water supply shortages and would eliminate the revolving door process of RVCWD relinquishing contract water in order to use it more flexibly as 1980 Stipulated Judgement surplus water as a third-tier outside-district RRFC customer. Therefore, the proposed annexation would not be sufficient to support or allow for growth in Redwood Valley.

Agriculture

The proposed annexation area includes land under a Williamson Act Contract. The State Farmland Mapping and Monitoring Program designations for the annexation area are Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Grazing Land, and Urban and Built-Up Land. RRFC is a raw-water wholesaler. Water RRFC delivers to contracted parcels is used for agricultural purposes and for residential and incidental uses allowed under the contracts. The annexation therefore complies with GOV § 56856.5

Unless mandated by the State, RVCWD does not prioritize domestic customers over agricultural customers. At minimum, it would be fiscally irresponsible to jeopardize 20-25 percent of annual revenue from agricultural customer accounts, but more importantly, the agriculture water system supports 2,200 acres of farmland and ranches and also supports many fire hydrants in the community of Redwood Valley.

RVCWD considers and plans for the needs of all its customers and aims to balance its available water supply between the demands of domestic customers and agricultural customers. Through the proposed annexation, RVCWD plans to use its RRFC contract amount to ensure a small measure of water security for agricultural customers and provide a backstop during water supply shortages, while relying on groundwater to ensure domestic supplies in the event of a drought or lack of surplus water being available through RRFC.

According to the Initial Study and Negative Declaration prepared for the project, there will be no significant impact to RRFC agricultural users because the proposed annexation: (1) will not increase the amount of water available to RVCWD, (2) will not provide RVCWD with a more reliable water supply that would allow it to lift either of the currently imposed moratoria, (3) will not result in any reduction in supply to RRFC current customers, and (4) will not result in shortages being imposed upon RRFC's agricultural customers for the benefit of domestic users.

The proposed annexation is not anticipated to convert farmland to non-agricultural uses because the proposal involves an already developed area without the potential for new construction, land use changes, or growth, and is intended to help stabilize existing agricultural customers in water supply shortages.

No impacts to existing agricultural viability, Williamson Act contracts, conservation easements, or open space resources are anticipated post-annexation.

Disadvantaged Unincorporated Communities

A Disadvantaged Unincorporated Community (DUC) is an unincorporated geographic area with 12 or more registered voters and with a median household income (MHI) that is less than 80% of the State MHI.

Senate Bill 244, which became effective in January 2012, requires LAFCo to evaluate any DUCs, including the location and characteristics of any such communities, when preparing a Municipal Service Review (MSR) that addresses agencies that provide water, wastewater, or structural fire protection services. This State legislation is intended to ensure that the needs of these communities are met when considering service extensions and/or annexations in unincorporated areas.

RRFC's recent 2025 MSR/SOI Update did not identify any DUCs contiguous to the proposed annexation area.

Further, special consideration for potential inclusion of a DUC affected by a city annexation proposal pursuant to GOV § 56375(a)(8)(A) is not relevant to the review of a special district annexation proposal.

SOI Consistency

A Sphere of Influence (SOI or sphere) boundary indicates the probable physical boundary or service area for local government agencies under LAFCo purview. The proposed annexation area is located within and consistent with [RRFC's current SOI boundary](#) adopted by the Commission on May 5, 2025 per LAFCo Resolution No. 2024-25-15.

Property Tax Exchange Agreement

Per Revenue and Taxation Code (RTC) § 99(b), upon the filing of a LAFCo application, but prior to the issuance of a certificate of filing (GOV § 56658), the Executive Officer shall give notice of the filing to the Assessor and Auditor to commence the property tax exchange process. Such notice was provided by LAFCo on October 21, 2025.

On July 7, 2026, the County Board of Supervisors adopted Resolution No. 26-120 approving a zero dollar tax sharing agreement and confirming that the existing shares of property tax will not change post-annexation for the proposed annexation (Attachment 8), which is substantially similar to Resolution No. 26-04 adopted by the Mendocino County Russian River Flood Control and Water Conservation Improvement District Board of Trustees on July 6, 2026 approving a zero tax sharing agreement for the annexation area (Attachment 9). According to the agreement, in the event the annexation becomes effective, there would be no change in the current apportionment of property tax, neither base tax nor future tax increment, in the annexation area.

CEQA Compliance

On October 6, 2025, the RRFC Board of Trustees, as Lead Agency under the California Environmental Quality Act (CEQA), approved the Revised Initial Study and adopted the Negative Declaration for the Mendocino County Russian River Flood Control and Water Conservation Improvement District Redwood Valley Annexation project (Attachment 6) under SCH No. 2025061147, and a Notice of Determination was filed on October 10, 2025 under Mendocino County Clerk-Recorder No. 2025-E0089 (Attachment 7).

The Initial Study examined all required environmental categories and determined that the annexation would have "No Impact" in every area analyzed. Key findings of the environmental review are as follows:

- No Physical Changes: The annexation involves no construction, land alterations, infrastructure development, or changes in land use.
- No Growth Inducement: The project will not induce population growth due to an existing court-ordered service connection moratorium that remains in effect and the fact that the annexation will not result in any additional reliable water supply to RVCWD.
- No Resource Impacts: No effects on air quality, water resources, biological habitat, cultural resources, agricultural lands, or other environmental resources.
- No New Operations: No changes to RRFC's water diversion facilities, quantities, or timing of diversions.
- Administrative Only: The project is purely a boundary adjustment to allow RVCWD to put water available under its Uniform Water Sale and Purchase Agreement to beneficial use throughout its entire service area.

Mendocino LAFCo, as a Responsible Agency, independently reviews and considers the Lead Agency's Initial Study and Negative Declaration in connection with consideration of the annexation proposal. LAFCo staff have found

that the environmental determination and associated documents were prepared in accordance with the requirements of CEQA and are adequate for the proposed action before the Commission. The Commission will consider making CEQA findings as detailed in the attached LAFCo Resolution No. 2026-27-04.

Expiration Date

The time limit for completion of this annexation (filing a Certificate of Completion) is one year from adoption of the Commission's approving resolution, unless an extension of time is approved by the Commission prior to the expiration date (October 4, 2027). All proceedings for this change of organization shall be deemed terminated on the one-year expiration date, or expiration of any extension of time, per GOV § 57001.

Public Notice

A 21-day Notice for Public Hearing was published in the newspaper, posted, and distributed by September 14, 2026. A mailing to landowners and registered voters in the RVCWD and within 300-feet of RVCWD was not required in this case because it would have exceeded 1,000 notices.

Public Comments

No public comments have been received to date.

Policy Consistency

The annexation proposal is substantially in conformance with Commission's local policies and procedures related to changes of organization or reorganizations.

Factors for Consideration

There are seventeen factors to be considered by the Commission in review of a change of organization or reorganization pursuant to GOV § 56668, which are addressed in the following table. No single factor is determinative; each factor is to be evaluated within the context of the overall proposal.

Factors for Consideration	
Factor	Evaluation
(a) Population and population density; land area and land use; assessed valuation; topography, natural boundaries, and drainage basins; proximity to other populated areas; the likelihood of significant growth in the area, and in adjacent incorporated and unincorporated areas, during the next 10 years.	-Redwood Valley features a gently sloping valley floor enclosed by steep coastal mountain ridges and carved by the headwaters of the West Fork of the Russian River, at a central elevation of 722 feet, and is located north of Ukiah and Calpella, southeast of Willits, west of Potter Valley. -Existing land uses in RVCWD are primarily single-family homes, including three mobile home parks and two Indian reservations, extensive farmland including viticulture, orchards, crop farming, and animal husbandry, and limited support commercial and institutional uses. -Redwood Valley sits largely outside of the Ukiah Valley alluvial groundwater basin in a fractured rock and upland setting that is not subject to SGMA. -The estimated population served by RVCWD is 5,200 people. -There is no current growth potential for the area. -Annexation would result in an intentional overlap of a water wholesaler (RRFC) and a water retailer (RVCWD) that are both already providing services to the area which is already developed and under domestic and agricultural connection moratoriums.

Factors for Consideration	
Factor	Evaluation
	-The total estimated property tax revenue for the annexation area is \$1,533,060.56 based on the FY 2025-26 assessment rolls.
(b) Need for organized community services; the present cost and adequacy of governmental services and controls in the area; probable future needs for those services and controls; probable effect of the proposed incorporation, formation, annexation, or exclusion and of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas. "Services," as used in this subdivision, refers to governmental services whether or not the services are services that would be provided by local agencies subject to this division, and includes the public facilities necessary to provide those services.	-Although annexation would not increase RRFC's licensed water supply or RVCWD's guaranteed contract quantity, it would allow RVCWD to use its contractual allocation throughout its service area, and to participate as an in-district customer when surplus water becomes temporarily available. -RVCWD does and will continue to need the public services it is currently receiving from RRFC. -There is no significant difference in the present and proposed cost of governmental services. -The adequacy of governmental controls will be improved by annexing the entire RVCWD service area into RRFC for logical jurisdictional authority (aligning contracts, controls, and services).
(c) The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on the local governmental structure of the county.	-The proposal aligns RRFC's jurisdictional boundary with its SOI boundary and licensed place of use, creating a more coherent governmental structure.- -The proposal improves the geographic utility and administrative efficiency of the existing RRFC-RVCWD service arrangement without requiring new infrastructure, increasing RRFC licensed diversions, reducing existing customers' contract quantities or changing the ordinary pro-rata shortage allocation, or transferring RVCWD's operations, governance, or debt obligations to RRFC. -Annexation would support regional coordination, planning, and advocacy to address intensifying drought conditions, reduced Eel River diversions, and long-term Lake Mendocino supply reliability. -The SWRCB curtailment order exception for minimum human health and safety already applies to the entire RVCWD population of 5,200 and would continue to apply with or without annexation. -No negative effects of the proposed annexation are anticipated for adjacent areas or mutual social and economic interests.
(d) The conformity of both the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies and priorities set forth in Section 56377. (Note: Section 56377 encourages preservation of agricultural and open-space lands.)	-Annexation would not create or guarantee an additional water supply, and would not lift the domestic and agricultural connection moratoriums. -The annexation proposal is not anticipated to facilitate growth, urban development, or sprawl. -The proposal is consistent with the Commission's policies and procedures for boundary changes.

Factors for Consideration	
Factor	Evaluation
(e) The effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by Section 56016.	-The annexation area includes land under a Williamson Act Contract. -State Farmland Mapping and Monitoring Program designates the annexation area as Urban and Built-Up Land, Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Grazing Land. -Annexation is not anticipated to convert farmland to non-agricultural uses because the proposal involves an already developed area without the potential for new construction, land use changes, or growth, and is intended to help stabilize existing agricultural customers in water supply shortages.
(f) The definiteness and certainty of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment or ownership, the creation of islands or corridors of unincorporated territory, and other similar matters affecting the proposed boundaries.	The proposal boundaries are definite, certain, and fully described, follow lines of assessment, and will not result in illogical shapes or the creation of islands of unincorporated territory.
(g) A regional transportation plan adopted pursuant to Section 65080.	Mendocino Council of Governments is the Regional Transportation Planning Agency for Mendocino County. The Regional Transportation & Active Transportation Plan was updated on June 1, 2026.
(h) The proposal's consistency with city or county general plans.	The proposal is consistent with the County of Mendocino General Plan and contains the following zoning designations: Agricultural, Rangeland/Forest Land, Residential, and Commercial/Industrial.
(i) The sphere of influence of any local agency that may be applicable to the proposal being reviewed.	The proposed annexation area is within the sphere of influence boundary adopted by the Commission for the RRFC in 2025.
(j) The comments of any affected local agency or other public agency.	The proposed annexation was routed for agency comments on October 22, 2025 and no comments were received.
(k) The ability of the newly formed or receiving entity to provide the services which are the subject of the application to the area, including the sufficiency of revenues for those services following the proposed boundary change.	-There will be no substantial change in the existing services currently provided to the annexation area. -RRFC is fully able to continue to provide raw water supply services to RVCWD at the cost for all RRFC in-district customers per the RRFC annual budget.
(l) Timely availability of water supplies adequate for projected needs as specified in Section 65352.5.	The proposal does not increase projected water demand. No new connections are authorized, and the domestic and agricultural moratoria remain in effect. Available supplies and historical demand are analyzed under Supply and Demand. The annexation makes RVCWD's existing 328.85 AF contract usable throughout its service area but does not create a new or more reliable supply.

Factors for Consideration	
Factor	Evaluation
(m) The extent to which the proposal will affect a city or cities and the county in achieving their respective fair shares of the regional housing needs as determined by the appropriate council of governments consistent with Article 10.6 (commencing with Section 65580) of Chapter 3 of Division 1 of Title 7.	-The annexation area is within and will continue to be within the unincorporated area of the County. -The County's Regional Housing Needs Allocation will remain the same for the annexation proposal.
(n) Any information or comments from the landowner or landowners, voters, or residents of the affected territory.	No public comments have been received from landowners, voters, or residents to date.
(o) Any information relating to existing land use designations.	The proposal contains the following County zoning designations: Agricultural, Rangeland/Forest Land, Residential, and Commercial/Industrial.
(p) The extent to which the proposal will promote environmental justice. As used in the law, "environmental justice" means the fair treatment of people of all races, cultures, and incomes with respect to the location of public facilities and the provision of public services.	The annexation extends access to RRFC water on equal terms throughout RVCWD's service area, including to lower-income households and tribal lands. It does not site public facilities or allocate services based on race, culture, or income.
(q) 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 pursuant to Section 21178 or maps that identify land determined to be in a state responsibility area pursuant to Section 4102 of the Public Resources Code, if it is determined that such information is relevant to the area that is the subject of the proposal.	-The State Fire Marshal has identified the greater Redwood Valley area as primarily within High and Very High Fire Hazard Severity Zones and being in State Responsibility Area, per Pub. Resources Code § 4202. -Redwood Valley is located within the Maacama Earthquake Fault System and Fracture Zone. -Most of Redwood Valley is outside the high-risk 100-year floodplain (FEMA Zone X). -The West Fork of the Russian River that flows directly through Redwood Valley is designated as regulatory floodway and adjacent areas are within the 100-year floodplain (FEMA Zone AE).

Final Steps

Following the public hearing, the Commission may approve, conditionally approve or deny the proposal. Should the Commission determine to approve the proposal, conditionally or unconditionally, LAFCo law provides for the following two processes prior to the completion of the annexation:

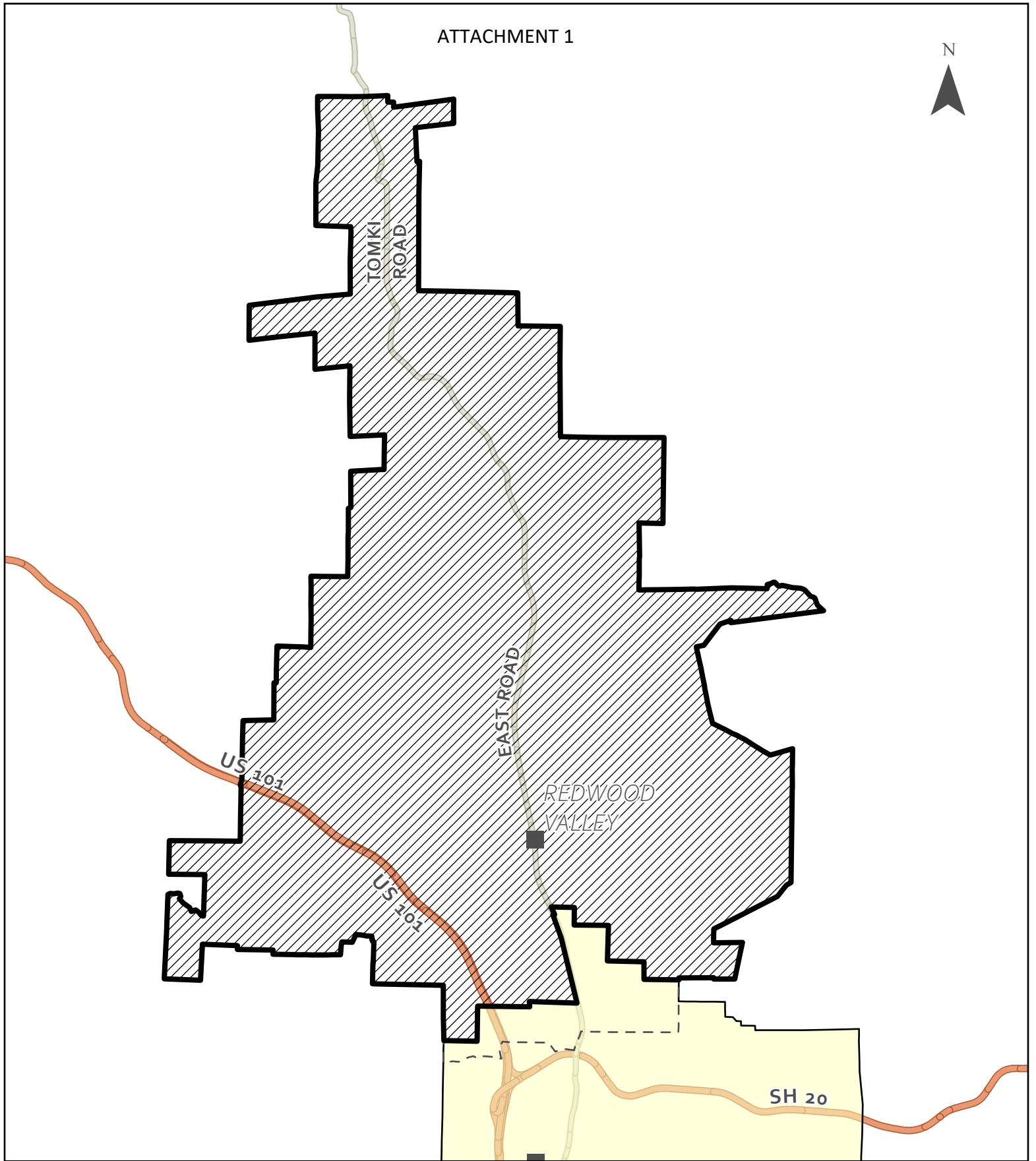
Reconsideration: When the Commission adopts a resolution making determinations, within 30 days, any person or affected agency may file a request for an amendment or reconsideration of the resolution. The request must state the specific modification being requested and must state the new or different facts that could not have been presented previously which warrant the Commission's reconsideration.

Protest Hearing: California Government Code § 57002 requires that within 35 days following the adoption of the Commission's resolution approving the annexation, the LAFCo Executive Officer shall set the proposal for a protest hearing and give notice of that hearing. The protest hearing cannot be held prior to the expiration of the 30-day

reconsideration period. If written protests are submitted by at least 25 percent of the registered voters within the annexation area, or by 25 percent of the landowners who control 25 percent of the entire assessed value of property within the annexation area, the annexation would be subject to an election.

ATTACHMENTS

- (1) Location GIS Map
- (2) Resolution of Application (including attachments: Plan for Services, maps, and legal description)
- (3) Resolution of Support
- (4) Letter of Support
- (5) Russian River Flood Control 2016-2025 Reported Water Use
- (6) Initial Study and Negative Declaration
- (7) Notice of Determination
- (8) County Tax Sharing Agreement
- (9) RRFC Tax Sharing Agreement
- (10) LAFCo Resolution No. 2026-27-04



LAFCo A-2025-05: Annexation of Redwood Valley County Water District

-  Proposed Annexation: A-2025-05
-  Existing Redwood Valley Water District
-  Russian River Flood Control District

1 inch equals 1 mile



Resolution #25-07

of the
**Mendocino County Russian River Flood Control
& Water Conservation Improvement District**

**Approval of Application to the
Mendocino County Local Agency Formation Commission
to Initiate Proceedings for the Annexation
of the Complete Redwood Valley County Water District Service Area**

WHEREAS, Mendocino County Russian River Flood Control & Water Conservation Improvement District (RRFC) desires to initiate proceedings pursuant to Part 3 of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (GOV §56000 et seq.) to annex the remaining jurisdictional boundaries of the Redwood Valley County Water District (RVCWD) not already located within the RRFC jurisdictional boundary (Annexation), as shown and more particularly described in Exhibit A: Area to be Annexed, attached hereto and incorporated herein by reference.

WHEREAS, GOV §56654(a) authorizes local agencies to initiate and request an annexation of lands by the adoption of a Resolution of Application; and

WHEREAS, both RRFC and RVCWD wish to partner in an annexation application as evidenced by the following actions:

1. On April 1, 2024, RRFC adopted Resolution No. 24-01, a *Commitment to Collaborate with Redwood Valley County Water District in Developing a Local Agency Formation Commission Annexation Application*; and
2. Subsequently, on April 18, 2024, RVCWD adopted a similar resolution (Resolution No. 24-01); and
3. RRFC and RVCWD entered a Memorandum of Understanding (MOU) to identify roles and responsibilities for development of an annexation application to the LAFCo, effective August 1, 2024.

WHEREAS, eligibility for the proposed annexation includes:

1. The proposed annexation area is within the RRFC current LAFCo approved Sphere of Influence; and
2. The proposed annexation area is within RRFC's State Water Resources Control Board water right license 13898 place of use.

WHEREAS, the reasons for the proposed Annexation are as follows:

1. RRFC can currently only provide to the portion of RVCWD outside the RRFC district boundary water surplus to RRFC customer demand when available as outlined in the 1980 Superior Court of the State of California No 42059 Stipulated Judgement and pursuant to California State Water Resources Control Board Water Right Order WR 79-15; and
2. Annexation of the entirety of RVCWD service area into the RRFC boundary would allow RVCWD to use RRFC water supplied through RVCWD's Uniform Water Supply & Purchase Agreement anywhere within the RVCWD service area.

WHEREAS, the proposed Annexation would be subject to the following terms and conditions:

1. It would not consist of a consolidation of services nor a consolidation of RRFC and RVCWD.
2. It would not negate, supersede, or otherwise impact the Stipulated Judgment No 42059.

WHEREAS, the Board hereby adopts the Plan for Services required pursuant to GOV §56653 set forth in Exhibit B: Plan for Services, attached hereto and incorporated herein by reference; and

WHEREAS, RRFC prepared an initial study to analyze the potential effects of the proposed Annexation on the environment pursuant to the California Environmental Quality Act (CEQA) and determined the proposed annexation will have no significant effect on the environment, and subsequently adopted a Negative Declaration for the proposed annexation on October 6, 2025.

WHEREAS, a Notice of Intention to adopt this Resolution of Application has been given to each agency required pursuant to GOV §56654; and

WHEREAS, the subject territory of RVCWD to be annexed into RRFC is inhabited; and

WHEREAS, the RVCWD Board of Directors adopted Resolution #25-02, a Resolution of Support to the Mendocino County Local Agency Formation Commission in support of Mendocino County Russian River Flood Control & Water Conservation Improvement District's Application to Initiate Proceedings for the Annexation of the Redwood Valley County Water District Boundary dated April 17, 2025; and

WHEREAS, the RRFC Board has considered the oral and/or written testimony made by any affected local agencies or interested persons provided prior to or appearing at the properly noticed public hearing for adoption of this Resolution of Application.

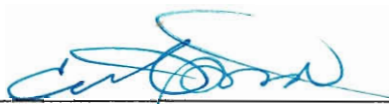
NOW, THEREFORE, BE IT RESOLVED, by the RRFC Board of Trustees as follows:

1. The above recitals are true and correct.
2. This Resolution is hereby approved and adopted by the RRFC Board, and the Mendocino County Local Agency Formation Commission is hereby requested to take proceedings for the proposed Annexation in the manner provided by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000; and
3. The lands proposed to be annexed into RRFC are depicted in Exhibit A: Area to be Annexed attached to this Resolution and incorporated herein; and
4. An application with supporting documentation as required by the Commission shall be submitted for the proposed Annexation to the Mendocino County Local Agency Formation Commission.
5. The proposed Annexation will have no significant effect on the environment and RRFC staff is hereby directed to file the approved Negative Declaration attached as Exhibit C: Signed Negative Declaration " with the Mendocino County Clerk and online with the appropriate state clearinghouse.

ADOPTED 6th day of October, 2025, by the Board of Trustees of the Mendocino County Russian River Flood Control & Water Conservation Improvement District, by the following vote:

Christopher Watt, President	<u>Yes</u> / No / Abstain / Absent
Tyler Rodrigue, Vice President	<u>Yes</u> / No / Abstain / Absent
John Bailey, Treasurer	<u>Yes</u> / No / Abstain / Absent
John Reardan, Trustee	<u>Yes</u> / No / Abstain / Absent
Dave Koball, Trustee	<u>Yes</u> / No / Abstain / Absent

Signed:



Christopher Watt, Board of Trustees President

10/6/25

Date

Attest:



Elizabeth Salomone, General Manager

10/6/25

Date

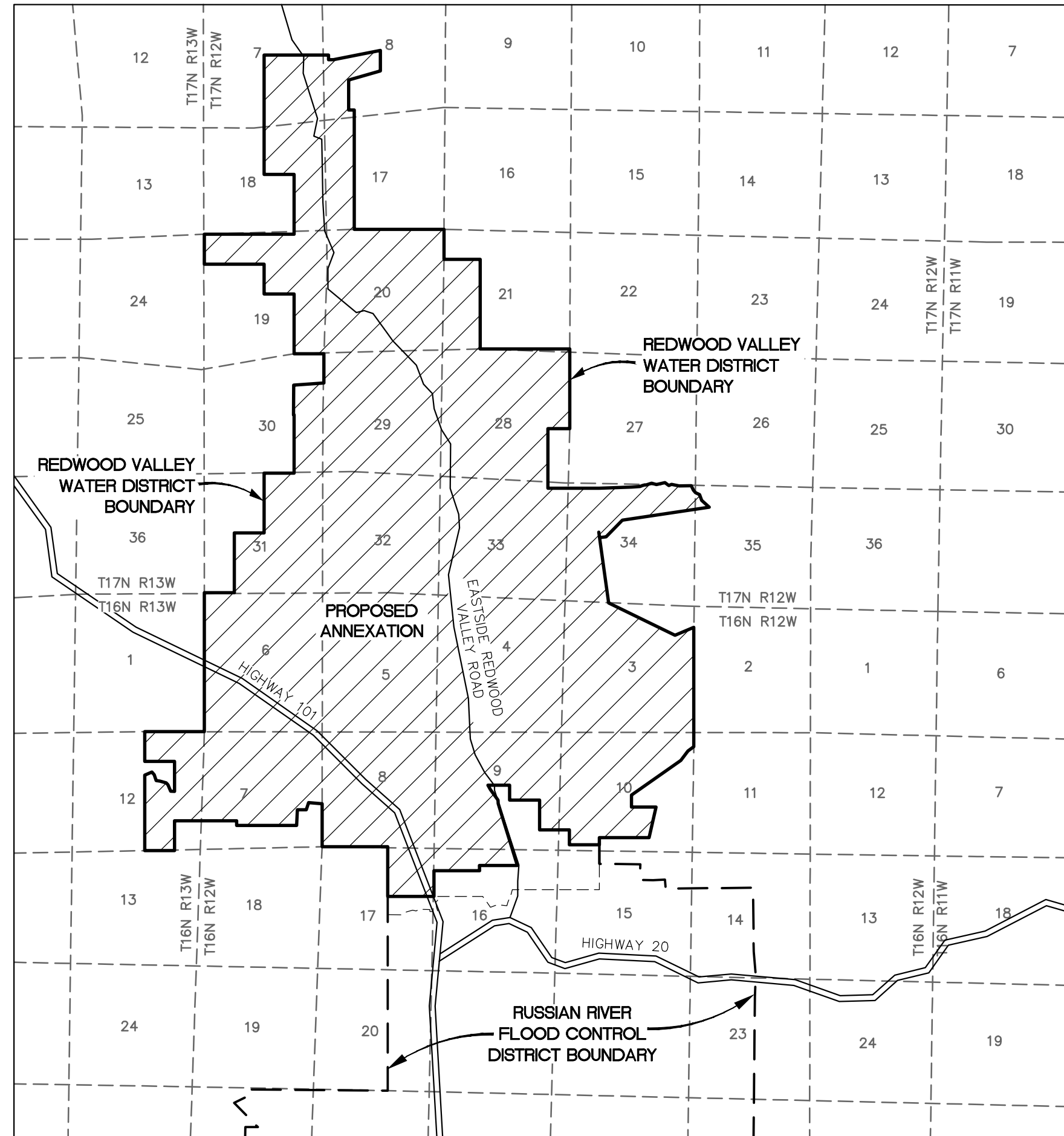


Exhibit A
to Resolution #25-07
Approval of LAFCo Application
for Redwood Valley Annexation Project

THIS MAP HAS BEEN PREPARED BY STEVEN J. KLEIN.

Steven J. Klein 06/18/25
STEVEN J. KLEIN, P.L.S. 8155



LEGEND

- BOUNDARY OF LANDS TO BE ANNEXED
- EXISTING BOUNDARY OF RUSSIAN RIVER FLOOD CONTROL DISTRICT
- SECTION LINES
- OVERLAP OF RVCWD & RRFC

MUNSELLE CIVIL ENGINEERING
CIVIL ENGINEERING & LAND SURVEYING
513 CENTER STREET
HEALDSBURG, CA 95448
(707) 395-0968



LAFCO SITE PLAN
REDWOOD VALLEY COUNTY WATER DISTRICT
REDWOOD VALLEY, CA

JOB NO.
129-25

SHEET NO.
1
OF 1 SHEETS

Continued Exhibit A
to Resolution #25-07
Approval of LAFCo Application
for Redwood Valley Annexation

Exhibit "A"

Project

Beginning at the southwest corner of the T17N, R12W, P1E & M. being the southwest corner of Section 31 of said Township; thence East along the south line of said section, 1/4 mile; thence North 1/2 mile; Thence East 1/4 mile to the center of said Section; thence North 1/2 mile to the south line of Section 30; Thence East 1/4 mile; Thence North 1/2 mile more or less to the southwesterly corner of the lands described as the Gabrielli Winery Property Annexation to the Redwood Valley County Water District LAFCO No. 90-5 in the document recorded in Book 1882 of Official Records, at Page 294, Mendocino County Records;

Thence along the easterly boundary of said lands North 01°37'45" East 85.095 feet; Thence South 87°07'47" West 10.761 feet; Thence North 00°18'32" East 1322.596 feet to the northwest corner of said lands; Thence along the northerly boundary line of said lands North 86°02'03" East 1337.632 feet to the easterly line of Section 30;

Thence North along the easterly line of Section 30 to the southeast corner of Section 19; Thence West 1/4 mile along the south line of Section 19; Thence North 1/2 mile; Thence West 1/4 mile; Thence North 1/4 mile; Thence West 1/2 mile to the West line of Section 19; Thence North 1/4 mile to the southwest corner of Section 18; Thence East 3/4 mile along the south line of Section 18; Thence North 1/2 mile; Thence West 1/4 mile to the center of Section 18; Thence North 1/2 mile to the south 1/4 corner of Section 7; Thence North 1/2 mile to the center of Section 7; Thence East 1/2 mile to the west 1/4 section corner of Section 8; Thence South along the west line of Section 8, 208 feet, more or less, to the northwest corner of the lands of Donald J. Wright, as described in the deed recorded in Book 458, Page 571, Official Records Mendocino County, California; Thence along the north and east line of said lands of Wright, East 208 feet, South 208 feet more or less, and East 208 feet more or less, to the northeast corner thereof, being also the northwest corner of the lands of Marvin Cannon, as described in the deed recorded in Book 585, Page 134, Official Records Mendocino County; thence along the north line of said lands and the lands of R.W. Dorsey 2000 feet more or less, to the northeast corner of said lands as described in the deed recorded in Book 609, Page 247, Official Records Mendocino County, being the east line of the Southwest 1/4 of Section 8; Thence South along the east line of said Southwest 1/4, Section 8, 900 feet more or less, to the northeast corner of the Southeast 1/4 of the Southwest 1/4 of said Section 8; thence along the north line of said Southeast 1/4 of Southwest 1/4, Section 8, West 1/4 mile to the northwest corner thereof; Thence 1/4 mile South along the west line of said Southeast 1/4, Southwest 1/4 to the northeast corner of the northwest 1/4 of northwest 1/4, Section 17; Thence East 250 feet; Thence 1 mile South, more or less, along the east line of the west 1/2 of the west 1/2 of Section 17 to the northeast corner of the northwest 1/4 of northwest 1/4, Section 20; Thence East along the north line of Section 20, 3/4 mile to the northeast corner thereof; Thence 1/4 miles South along the east line of the northwest 1/4 of northwest 1/4, Section 21;

Continued

Thence East 1600 feet more or less along the south line of said section; thence South 3/4 mile to a point on the north line of Section 28; Thence East along said line 3/4 mile to the northwest corner of Section 27; thence 2/3 mile South along the west line of Section 28, more or less, to the southeast corner of the lands of Ford and Rawles as described in the deed recorded in Book 440, Page 512, Official Records, Mendocino County, thence West along the south line of said lands, 970 feet, more or less to a point on the east line of the lands of Geroge C, Halletux as described in the deed recorded in Book 582, Page 561, Official Records Mendocino County; Thence 1/2 mile south along the west line of said lands and the east line of the lands of M. Laforet; Thence East 2272 feet, more or less along the south line of said lands to the northeast corner of the lands of E.G. Lynch, as described in the deed recorded in Book 182, Page 43, Official Records, Mendocino County, said point being also the northwest corner of the lands described as the Redwood Valley Rancheria Property Annexation to the Redwood Valley County Water District recorded in Book 2171 of Official Records, Page 635, Mendocino County Records and northwest corner of the lands that are shown on that Record of Survey recorded in Map Case 2, Drawer 46, Page 56;

Thence around the boundary of said lands of Redwood Valley Rancheria Property Annexation North 87°57'52" East, 1434.66 feet to the northeast corner of Lot 19 of the Finnish Colony Subdivision thereof recorded in Case 1, Drawer 4, Page 89, Mendocino County Records; thence along an existing fence as shown on said Record of Survey the following courses: North 85°28'24" East, 368.20 feet; thence north 71°05'33" East, 121.36 feet; thence North 72°02'50" East, 99.31 feet; thence North 89°03'35" East, 64.30 feet; thence north 75°25'31" East 125.45 feet; thence North 71°34'19" East, 127.42 feet; thence South 75°51'55" East, 219.47 feet; thence North 74°53'05" East, 375.29 feet; thence South 44°18'56" East, 20.95 feet; thence South 52°00'55" East, 90.24 feet; thence South 53°28'34" East, 117.93 feet; thence North 68°51'22" East, 132.74 feet; thence South 77°52'39" East, 339.04 feet; thence North 88°29'31" East, 537.44 feet; thence South 25°52'03" East, 220.82 feet; thence South 38°00'11" East, 146.95 feet; thence South 65°57'46" East, 201.77 feet; thence South 20°46'37" East, 272.91 feet; thence South 48°08'19" East, 446.29 feet; thence leaving said fence as shown on said map South 81°28'32" West, 3884.84 feet; thence South 44°20'25" West, 1029.15 feet; thence South 82°11'42" West, 265 feet to the southwest corner of Lot 20 of said Finnish Colony Subdivision;

Thence South 8 degrees East 2924.8 feet, more or less, to the northwest corner of Lot 15 of said Finnish Colony Subdivision; thence south 64 degrees East 3265 feet; thence North 67 degrees East, 900 feet to the east line of the Yokayo Rancho; thence South 1 mile, more or less to the southeast corner of the lands of John Barrella as described in the deed recorded in Book 168, Page 295, Official Records, Mendocino County; thence South 55 degrees West 316 feet, more or less; thence South 37 degrees West 532 feet; thence South 55 degrees West 2657 feet more or less;

Continued

Thence South 530 feet to the northwest corner of the lands of Lee Sorelles as described in the deed recorded in Book 445, Page 6, Official Records Mendocino County; thence East along the north line of said lands 1089 feet to the northeast corner; thence 1390 feet South 13 degrees West along the east line to the southeast corner thereof; thence 220 feet West along the south line of the lands of Jay Long as described in the deed recorded in Book 4321, Page 320, Official Records, Mendocino County, to the southwest corner of said lands of Long; thence South 320 feet, more or less, along the east line of Calpella Fruit Land Tract, as shown on the map thereof recorded in Case 1, Drawer 3, Page 18, Mendocino County Records, to the southeast corner of Lot 5 thereof;

Thence West along the south line of Lot 5 to the southwest corner of Lot 5; thence North along the west line of Lot 5 to the northwest corner of Lot 5; thence West along the south line of Lot 12 to the southwest corner of Lot 12; thence North along the west lines of Lots 11 and 12 to the southeast corner of Lot 18; thence West along the south line of Lot 18 to the southwest corner of Lot 18; thence North along the west line of Lot 18 to the northwest corner of Lot 18; thence West along the southerly line of Lot 33 and the westerly projection thereof to the intersection of the west line of the County Road with the westerly projection of the southerly line of Lot 33; thence southerly along the west line of the County Road to the southeast corner of Lot 32; thence West along the south line of Lot 32 to the intersection thereof with the center of the channel of the Russian River, thence along the center of the channel of the Russian River to the northerly line of Lot 108, Yokayo Rancho; Thence along the northerly line of Lot 108, West, South, and West to the southwest corner of the lands of Fred Finne as described in the deed recorded in Book 405, Page 130, Official Records, Mendocino County;

Thence North 2200 feet along the west line of said lands; thence West 2900 feet; thence North 1900 feet to the southeast corner of the Del Arbbres Subdivision, as shown on the map recorded in Case 1, Drawer 10, Page 15, Mendocino County Records; thence North 85 degrees West 600 feet; thence South 17 degrees West 330 feet; thence West 400 feet; thence South 3 degrees West 490 feet; thence West 2570 feet on the south line of said subdivision to the southwest corner thereof; thence North along the west line of said subdivision to the southeast corner of Lot 3 of Section 7, Township 16 North, Range 12 West, M.D.B. & M.;

Thence West along the southerly boundary of said Lot 3 to the southeast corner of the north 1/2 of the southeast 1/4 of Section 12, Township 16 North, Range 12 West, M.D.B. & M.; thence West along the southerly boundary of said north 1/2 of the southeast 1/4 of said Section 12 to the northeast corner of the southwest 1/4 of the southeast 1/4 of said Section 12; thence South along the easterly boundary of the southwest 1/4 of the southeast 1/4 of said Section 12 to the southerly boundary of Section 12; thence West along the southerly boundary of Section 12 to the southwesterly corner of the southwest 1/4 of the southeast 1/4 of Section 12;

Continued

Thence North along the westerly boundary of the east 1/2 of Section 12 to Seward Creek; thence southeasterly along Seward Creek to the westerly boundary of the southeast 1/4 of the northeast 1/4 of Section 12; thence North along the westerly boundary of the southeast 1/4 of the northeast 1/4 of Section 12 to the southerly boundary of the north 1/2 of the northeast 1/4 of Section 12; thence West along the southerly boundary of the north 1/2 of the northeast 1/4 of Section 12 to the southwesterly corner thereof; thence North along the westerly boundary of the north 1/2 of the northeast 1/4 of Section 12 to the northerly boundary line of said Section 12; thence East along the northerly boundary line of Section 12 to the northeast corner of said Section 12 and the southwest corner of Section 6, Township 16 North, Range 12 West, M.D.B. & M.;

Thence North 1 mile, more or less, along the west line of Section 6 to the Point of Beginning.

This description was prepared by me or under my direct supervision in June 2025.



6/18/2025

Steven J. Klein, PLS 8155

Date



End of Description

Mendocino County

Russian River Flood Control & Water Conservation Improvement District

P.O. Box 2104 Ukiah, CA 95482 707.462.5278 Website: RRFC.net DistrictManager@rrfc.net

**Plan for Services
For RRFC Annexation of the Complete
Redwood Valley County Water District Service Area**

Summary of proposal

The proposal before LAFCo is the annexation of the remaining portion of the Redwood Valley County Water District (RVCWD) boundary and service area into the Mendocino County Russian River Flood Control and Water Conservation District (RRFC) boundary with no dissolution of RVCWD or consolidation of services.

RRFC wholesales water from the East Fork Russian River and Lake Mendocino under the terms of its State Water Resources Control Board (SWRCB) issued water right license 13898. RVCWD would join other water retailers within the RRFC boundary who currently purchase water from RRFC under a Uniform Water Sale & Purchase Agreement (Agreement.) These retailers include Millview County Water District, Willow County Water District, Hopland Public Utility District, Calpella County Water District, Rogina Mutual Water Company, and River Estates Mutual Water Company.

RVCWD services provided within the proposed annexation area consist of domestic water service to 1,105 equivalent dwelling units and 197 agricultural customers. Currently, RVCWD has an Agreement with RRFC that covers the small portion of its service area that falls within the RRFC boundary. RVCWD can receive RRFC surplus water, when available, for the remainder and majority of its service area pursuant to a 1980 Stipulated Judgement between the two entities (Stipulated Judgment). Annexation would provide an opportunity for RVCWD to expand the place of use in the Agreement to the entire RVCWD service area.



Lake Mendocino, September 2022 by Russian River Confluence

President
Christopher Watt

Vice President
Tyler Rodrigue

Treasurer
John Bailey

Trustee
John Reardan

Trustee
Dave Koball

District profiles

The Mendocino County Russian River Flood Control and Water Conservation Improvement District (RRFC) was formed in 1956 to serve, along with the Sonoma County Water Agency, as the local sponsor for the development of Coyote Dam and Lake Mendocino. RRFC encompasses approximately 51,000 acres from the south end of RVCWD to just north of the Sonoma County line (Figure A.)

RRFC provides wholesale water under a State Water Resources Control Board (SWRCB) issued water right license 13898 (License.) RRFC is authorized to divert 7,940 acre feet a year from the East Fork Russian River and Lake Mendocino for domestic, municipal, and irrigation purposes within this RRFC licensed place of use.

The District offers water sales contracts to water users within its boundaries through the Agreement for delivery of water available under the License. The water is diverted and sold as raw water to customers for municipal water service uses, private agricultural entities for irrigation and frost protection purposes, and to others for industrial and domestic use. The Agreement specifies the amount of water that can be diverted annually, from what locations (or points of diversion), the purpose of use, and where the contracted water may be used. The Agreement defines terms for purchasing surplus water, measuring and reporting use, allocations during shortage, and responsibilities of each party to comply with all relevant laws and regulations by third parties. The term of the Agreements is twenty (20) years with an option to renew.



Lake Mendocino at Coyote Valley Dam, 2024 by CJ Watt

The quantity of water contracted to RRFC Customers remains relatively steady. Annually, any remaining uncontracted water supply is made available as surplus, first to RRFC customers as per the Agreement, and then to RVCWD, as per the conditions of the Stipulated Judgement. On an annual basis, RRFC customers may offer to make some or all of their contract quantity available to other District customers and RVCWD as surplus through a transfer agreement.

RRFC has a five-member Board of Trustees elected at large to serve staggered four-year terms and District operations are performed year-round by the full-time General Manager, the District's only employee. The District obtains additional operational and planning support by engaging consultants and legal services. The District does not own or operate any facilities or infrastructure other than meters; its contractors are responsible for their own treatment, infrastructure, and delivery systems.

RRFC is recently underwent a Municipal Service Review (MSR) and Sphere of Influence (SOI) update in coordination with this annexation application. The extent of the proposed annexation area is the RVCWD boundary which is within the RRFC SOI. There are no changes being requested in the SOI.

The Redwood Valley County Water District (RVCWD) was established on January 16, 1964 under Sections 30322 and 30323 of the Water Code. RVCWD has a dual distribution system; irrigation water service began in April 1979; domestic water service began in November 1979. RVCWD's service area is roughly 15 square miles and is located north of the Ukiah Valley area (Figure B), with only a small area of approximately 200 acres in the southern portion within the RRFC boundary. RVCWD serves a total of 1105 equivalent dwelling units and 197 agricultural customers.



RVCWD has three sources of water supply. Treated municipal supply is purchased from Millview County Water District surplus groundwater supply via an intertie. Untreated water is purchased from RRFC, pumped by RVCWD from its Lake Mendocino pump station into the agricultural supply lines and to a holding reservoir. Water can be routed through the water treatment plant then stored in tanks for municipal supply. Untreated water can be routed from the reservoir to the irrigation distribution system. RVCWD also holds a largely un-exercisable right to divert up to 4,900 acre feet a year directly from Lake Mendocino between November 1 and April 30 of each year. Water diversions under this right can only occur in instances when stream flows in the Russian River main stem (as measured at the confluence of the East and West forks) exceed 150 cubic feet per second and Lake Mendocino storage is within the flood pool. This represents a relatively narrow window of opportunity and RVCWD has not exercised this right in the last 5 years. Additionally, in order for this winter-diverted water to be useful to RVCWD, it must be stored and the District's only pond is grossly insufficient in size.

RVCWD pump & intake at Lake Mendocino, by E Salomone

RVCWD is currently under a court-ordered moratorium for domestic connections and a district board initiated moratorium on irrigation connections. The proposed annexation will not meet the requirements to lift this moratorium.

RVCWD has a five-member Board of Directors elected at large to four-year staggered terms. In 2024, RVCWD joined the Ukiah Valley Water Authority (UVWA), a newly consolidated water management joint powers agency. Members of UVWA include the City of Ukiah, Calpella County Water District, Millview County Water District, Redwood Valley County Water District, and Willow County Water District, creating coordination which aims to modernize water infrastructure and governance while maximizing water access and resilience. The day-to-day operations of UVWA are managed by City of Ukiah employees and as of January 1, 2025, all RVCWD operational services were transferred to the City of Ukiah. UVWA is actively working with the SWRCB to obtain funding under the Safe and Affordable Funding for Equity and Resilience (SAFER) program to enhance and secure municipal water supplies which will include improving the municipal water supply services to RVCWD. UVWA is a functional consolidation of water agencies and while not an actual reorganization/consolidation under LAFCo, UVWA intends to move forward with formal LAFCo applications for reorganization/consolidation over the next few years.

History

The concept of consolidating water services has been discussed off and on in the greater Ukiah Valley for well over 30 years and has been the subject of numerous reports and studies.

In 2011, RRFC and RVCWD signed a Memorandum of Agreement (MOA) in pursuit of consolidation. In 2014, progress was made toward an annexation and dissolution of RVCWD before the Districts jointly concluded it was not a viable option.

In 2019, RRFC once again began to explore how to elevate the customer status of RVCWD from surplus only. An Agreement to Terms of Service was developed by a joint Ad Hoc Committee and approved by both Districts. The agreement lays out the terms under which RRFC provides surplus water to RVCWD.

In early 2024, RVCWD and RRFC resumed the collaboration toward annexation. On April 1, 2024, RRFC adopted Resolution No. 24-01, a *Commitment to Collaborate with Redwood Valley County Water District in Developing a Local Agency Formation Commission Annexation Application* and on April 18, 2024, the RVCWD adopted Resolution No. 24-01 of the same title. On August 1, 2024, RRFC and RVCWD entered a Memorandum of Understanding (MOU) regarding the development of an annexation application to LAFCo including a cost sharing agreement. This latest attempt has successfully resulted in this annexation application to LAFCo.



Lake Mendocino 2019, by Bobby Cochran Photography

Description of current services

RRFC is restricted from providing a stable water supply source to the entirety of the RVCWD service area under an Agreement because RVCWD is not fully within the current RRFC jurisdictional boundary and RRFC does not currently have enough water available under its License not under contract to meet RVCWD demands.

RRFC's License authorizes it to divert 7,940 acre feet a year from the East Fork Russian River and Lake Mendocino for domestic, municipal, and irrigation uses within the RRFC licensed place of use. The License acknowledges that a prior State Order WR 79-15:

approved delivery of up to 4,000 acre-feet per annum of water under this right to the Redwood Valley County Water District and added the Redwood Valley County Water District as an authorized place of use, upon the following condition: Water to be utilized in this additional place of use shall be available only until the same is necessary to supply water for any existing or future use of water within the Mendocino County Russian River Flood Control and Water Conservation Improvement District. Neither the Redwood Valley County Water District nor any user within that district will acquire a vested right to water available under this right as a result of this change in place of beneficial use.

RRFC currently provides water service to RVCWD pursuant to the Stipulated Judgment, which provides that RRFC must provide surplus water to Redwood, defined as "that portion, if any, of said 8,000 acre feet which is not put to beneficial use within the land situated in the Mendocino district." RRFC surplus water supply is determined by the amount of uncontracted water under this License. Additionally, RRFC customers can offer to make some or all of their contract quantity available to other customers and/or RVCWD as surplus through a transfer agreement on an annual basis.

Currently, RVCWD purchases water from both Millview CWD and RRFC that has been determined to be surplus to the ongoing needs of the two respective organizations. Millview CWD provides RVCWD with groundwater, which is not regulated by the SWRCB and has no assigned place or purpose of use. The amount of water that can be delivered by Millview CWD to RVCWD is limited by the size of the infrastructure, amounting to approximately 55 gallons per person per day to RVCWD municipal customers. With the recent formation of the Ukiah Valley Water Authority (UVWA) JPA, the expectation is that the UVWA will use State funding from the Safe and Affordable Funding for Equity and Resilience (SAFER) program to enhance and secure municipal water supplies through consolidation of the JPA member water rights and expanding groundwater pumping and delivery. Infrastructure improvements will include the delivery lines for the RVCWD municipal water supply.

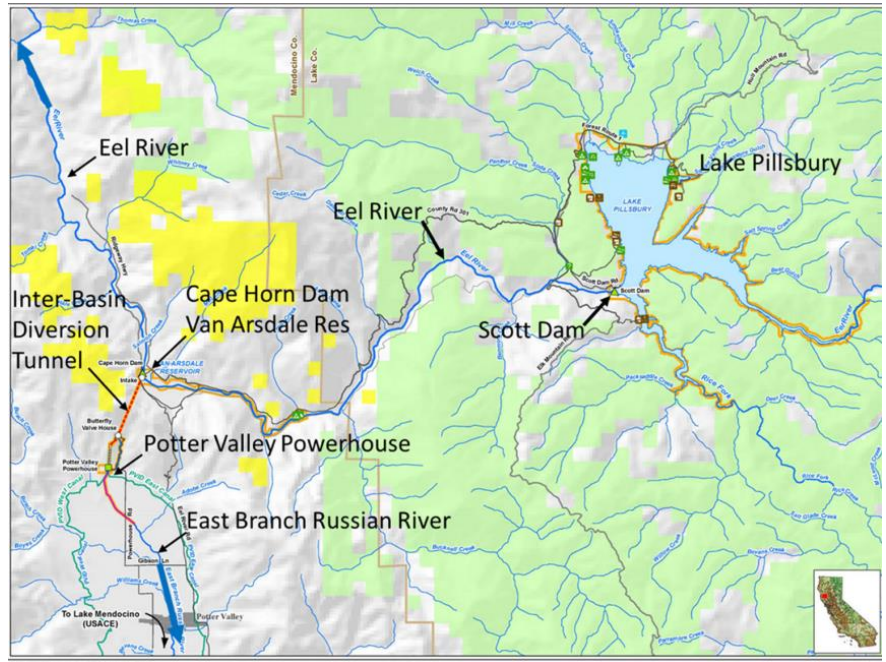
RVCWD has purchased an annual average of 850 acre feet of surplus water from RRFC since 2016, which includes times of supply restriction. This water is used to serve RVCWD's agricultural customers and as a supplement to the surplus water from Millview CWD for municipal supply. This supplementation will remain important to RVCWD until the improvements in infrastructure from UVWA are complete. Afterwards, the RRFC water will provide a redundant source in place for emergencies. RVCWD agricultural customers depend on the RRFC surplus supply, only augmented by those few and far between times RVCWD can exercise its own water right. The Redwood Valley agricultural community also relies on surface water storage ponds and groundwater, where available. During a drought, both ponds and wells are at high risk of going dry and farmers then rely solely on water stored in Lake Mendocino under RRFC's water right.

While under the RRFC License, RVCWD is allowed up to 4,000 acre feet of surplus annually, that amount has historically not been available, nor has RVCWD needed that quantity from RRFC. Due to water supply availability impacts from climate change = and the restrictions of the Potter Valley Project there will be less and less surplus water available to RVCWD from RRFC in future years.

Service Challenges

The primary challenge in providing water in the Russian River watershed is reliable water supply due to both intensifying drought conditions and the impending changes to the Potter Valley Project.

The Potter Valley Project (PVP) has been rerouting water from the Eel River to the Russian River for over a century, growing and sustaining the economy in communities through agriculture, drinking water, and even recreation with additional water supplied as a byproduct of power generation. Pacific Gas & Electric (PG&E) as the current owner the PVP has determined in the last few years that the PVP is no longer a viable project to maintain and has issued a public draft application for surrender and decommissioning of the PVP. The final application will be submitted to the Federal Energy Regulatory Commission (FERC) by July 29, 2025.



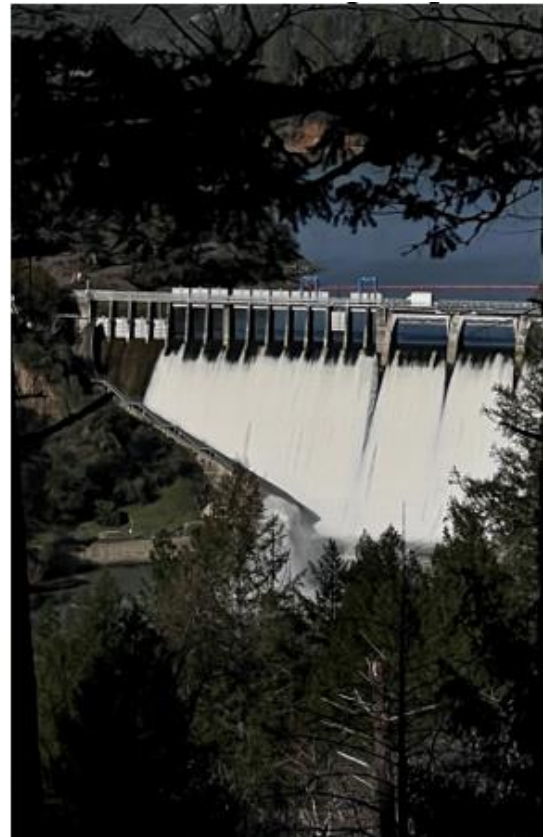
Potter Valley Project map by PG&E

The Russian River Watershed has been active for years in an effort to continue this trans basin diversion. Prior to 2019, a group of organizations representing both Eel and Russian River water user interests attempted to purchase the PVP with intent to relicense the entire project through FERC. Being unsuccessful, Russian River representatives reorganized and formed the Eel Russian Project Authority (ERPA) to develop solutions under the scenario of the PG&E decommissioning. ERPA met with Eel River Watershed interests, forming the Two-Basin Partnership and entered into talks to develop a proposal to submit to PG&E for a new diversion facility on the Eel River.



Lake Pillsbury by CJ Watt

In February 2025, the Two-Basin Partnership members established a Memorandum of Understanding (MOU) to advance a water diversion agreement associated with PG&E's decommissioning of the Potter Valley Project. The MOU details how Russian River water users can continue to divert water, without harming the recovery of salmon species on the Eel River. It commits the parties to support the removal of the two dams on the Eel River, restoration in the Eel River watershed, developing water supply reliability and self-reliance in the Russian River, and sets terms for the proposed continued diversion. Under the current plan, a new water diversion facility will be designed to mimic a free-flowing Eel River and diversion to the Russian River will occur mostly in the wintertime and under strict rules designed to protect Eel River biological resources and ecological processes. These diversions are dependent on hydrological conditions in the Eel River and not guaranteed. It is expected that intensifying drought conditions will impact the ability to divert water in some years and the current lack of storage capacity in the Russian River watershed is another obstacle to addressing the significant deficit of diverted water.



Scott Dam at Lake Pillsbury by CJ Watt

Russian River water users will have to wait for several years as the decommissioning approval process moves through FERC. In the meantime, significant funding will need to be obtained to move forward with the plans. Mendocino County Inland Water & Power Commission (IWPC) is the local joint powers agency leading the effort in both the continued trans basin diversion and the feasibility of modernizing Coyote Valley Dam to, among other things, provide additional storage space in Lake Mendocino. Both RRFC and RVCWD are members of IWPC and contribute financially to the ongoing efforts.



Cape Horn Dam at the diversion site by Cal Trout

Intensifying climate conditions are a major concern for water suppliers through California. The region has experienced several significant droughts in the last 20 years, with the most recent one in 2020-2022 burdening the region with a drought declaration by the Governor of California and State Water Resources Control Board emergency regulations resulting in curtailment of water rights. Lake Mendocino reached its lowest point since filling and many community members were under strict water rations.

Both RRFC and RVCWD have guidelines to address water supply shortages.

RVCWD adopted a conservation ordinance in 2007 to deal with droughts such as those that occurred in 2007–2009. The ordinance includes six tiers, of which the most severe restrictions apply to Tier 6. Tier 4 was implemented in 2009 when Lake Mendocino water levels receded to record lows. At that time mandatory rationing was imposed by the SWRCB, which resulted in a 50 percent reduction in water use. During the 2013-2015 drought, Tier 4 was again implemented, resulting in limits of 50 gallons per person per day and no agricultural water deliveries. During the 2020-2022 drought, RVCWD had limited supply for agricultural customers, with no deliveries being made in all of 2021 and most of 2022. The physical limitations of the Millview CWD intertie required RVCWD to ration municipal supply to 55 gallons per person per day.



Lake Mendocino north boat ramp, January 2021 by E Salomone

RRFC has a Water Conservation Program outlined in District Ordinance #25-01 to enact when conditions limit the water supply available to its customers. In the 2013-2015 drought, RRFC implemented mandatory reductions on District customers and coordinated an emergency water supply for RVCWD. During the 2020-2022 drought, RRFC declared a Water Supply Emergency, when the District determined a major failure of supply and storage, including no surplus water supply to provide to RVCWD. RRFC customers were asked to voluntarily reduce water use and through resounding cooperation were able to continue accessing RRFC stored water in Lake Mendocino, though the SWRCB was close to curtailing that use.

In 2022, the District and Sonoma County Water Agency entered a Memorandum of Understanding (MOU) concerning Lake Mendocino Storage Planning and Russian River Management. The MOU was developed in response to SWRCB terms during the drought and establishes planning and management activities related to the shared water supplies in Lake Mendocino. This MOU established the amount of stored water available to the various parties and will be a critical tool in years with reduced water supply.

RRFC, Sonoma Water, and other regional water interests worked with the SWRCB beginning in 2020 to develop the Upper Russian River Voluntary Water Sharing Program. The Program allows collaboration to share limited water resources within the water rights priority system regulated by the SWRCB. Work continues to enhance this Program.

Services Under Annexation

As mentioned, RVCWD currently holds an Agreement with RRFC for 328.85 acre feet for use within RVCWD's approximately 200 acres located within RRFC's jurisdictional boundaries. Annexation of the remaining portion of the RVCWD service area into the RRFC boundary will allow RVCWD to use the water supply available under the Agreement anywhere in its service area. In addition, annexation would allow RVCWD to put surplus water available under its Agreement to beneficial use anywhere within the entire Redwood service area, not just that portion currently within RRFC.

All infrastructure is already in place; there will be no interruption in the services provided to RVCWD. The annexation is not expected to increase RVCWD's historical use of RRFC's License or induce growth due to regional water supply challenges described above. RVCWD will continue to use RRFC water as it has, for agricultural customers and as an emergency backup for domestic supply until such time as the UVWA expands the groundwater supply and infrastructure.

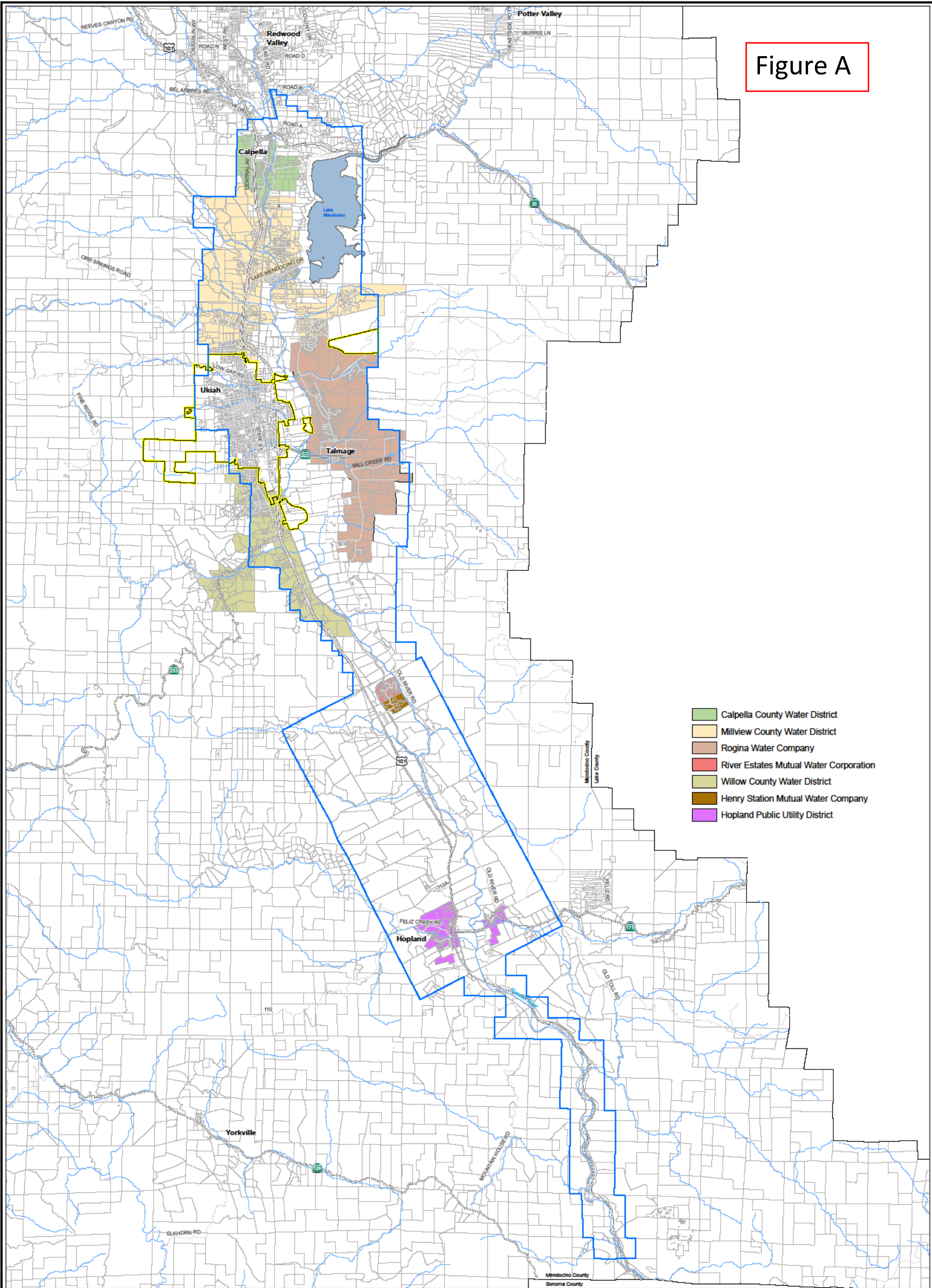


RVCWD pump house and intake at Lake Mendocino, by CJ Watt

Financial or Fiscal Impact

RVCWD currently pays for water under its Agreement. In addition, it pays for surplus water used from RRFC as per terms of the 1980 Stipulated Judgement between the two entities. The purchase price of surplus water is determined by dividing RRFC's operational expenses by 7,940, the licensed amount under RRFC's License. RRFC does not budget revenue from the sale of surplus water since it is an unknown in any given year. Once annexed, the only change is that the cost per acre foot to RVCWD will be the same as for all RRFC customers if it includes its entire service area under its Agreement, determined by the Board of Trustees through the adoption of fiscal year budgets.

Figure A



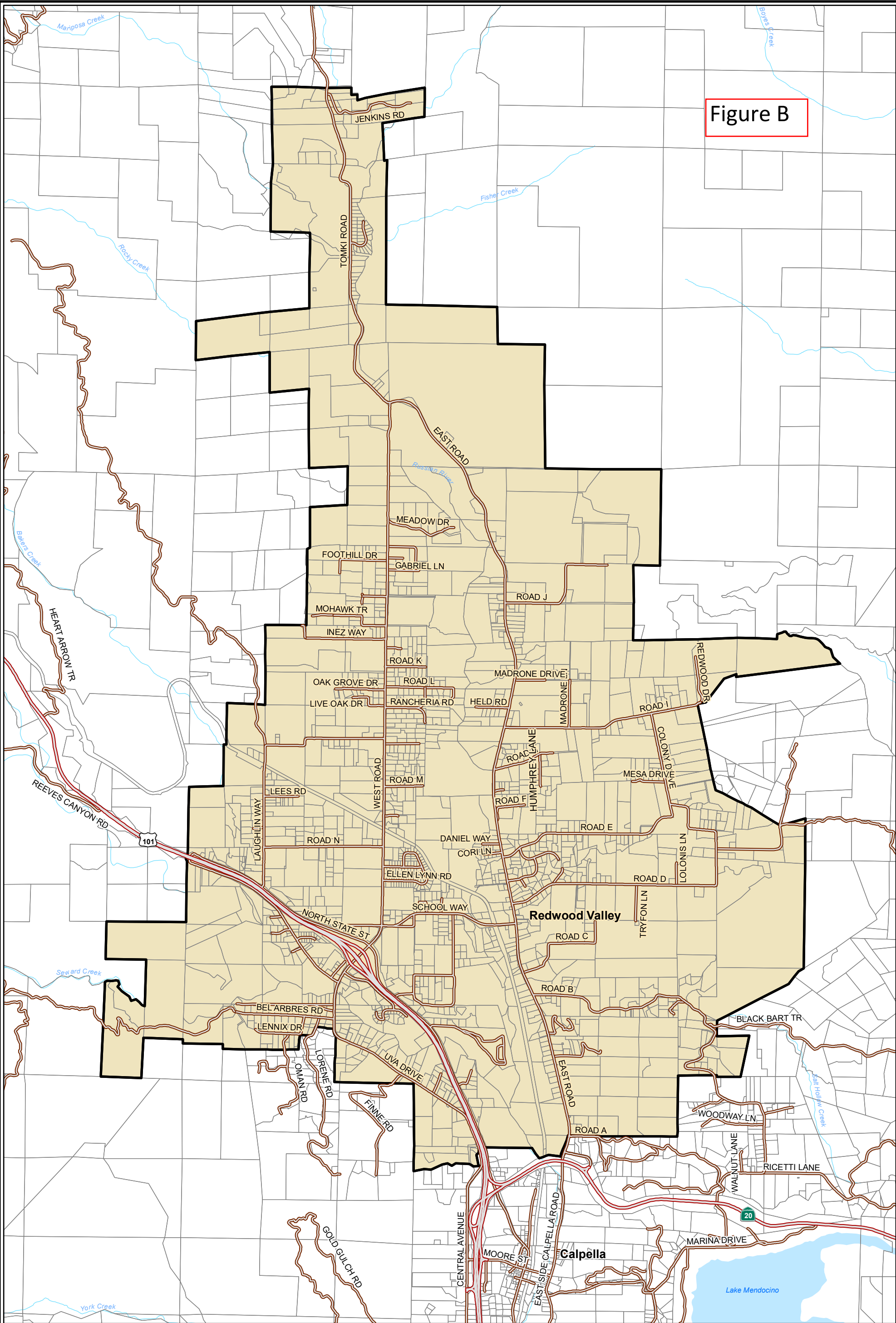
Russian River Flood Control District

Source: This map was prepared by the Mendocino County Division of Information Services GIS Program, March 17, 2025.
Note: This map is not a survey product.

- Russian River Flood Control District
- Incorporated City
- Parcels
- Highways
- Roads
- Streams



Figure B



Redwood Valley Water District

Source: This map was prepared by the County of Mendocino Information Services
GIS Program December 18, 2024.
Note: This map is not a survey product and should not be used to determine legal boundaries.

- Water District
- Parcels
- Highways
- Roads
- Streams



**MENDOCINO COUNTY RUSSIAN RIVER FLOOD CONTROL
AND WATER CONSERVATION IMPROVEMENT DISTRICT
NEGATIVE DECLARATION REGARDING ENVIRONMENTAL IMPACT**

1. NOTICE IS HEREBY GIVEN that the Project described below has been reviewed pursuant to the provisions of the California Environmental Quality Act of 1970 (Public Resources Code Section 21100, et seq.) and a determination has been made that it will have no significant effect upon the environment.
2. PROJECT NAME: Mendocino County Russian River Flood Control and Water Conservation Improvement District Redwood Valley Annexation Project (“**Project**”).
3. DESCRIPTION OF THE PROJECT: Filing of an application with the Mendocino County Local Agency Formation Commission to annex the Redwood Valley County Water District (“**RVCWD**”) into the RRFC. The Project Description is more fully set forth in the Initial Study for the Project. The purpose of the annexation is to allow RVCWD to contract with the RRFC to receive surface water supplies available under the RRFC’s licensed water right.
4. LOCATION OF PROJECT: The Project is located within Mendocino County as shown on the areas identified on the map attached as **EXHIBIT “A”**.
5. NAME AND ADDRESS OF PROJECT PROPONENT: Mendocino County Russian River Flood Control and Water Conservation Improvement District, PO Box 2104, Ukiah, CA 95482, (707) 462-5278.
6. MITIGATION MEASURES: None.
7. A copy of the Initial Study regarding the environmental effect of this Project is on file at the RRFC office at 304 North State Street, Ukiah, California, 95482. This study was:

☒ Adopted as presented.

☐ Adopted with changes. Specific modifications supporting reasons are attached.
8. The RRFC considered and adopted this Negative Declaration at a public meeting of its Board of Directors on October 6, 2025.
9. DETERMINATION: *(To be completed by the Lead Agency).*

On the basis of this initial evaluation:

- ☒ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- ☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards; and (2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (1) have been adequately analyzed in an earlier EIR or NEGATIVE DECLARATION pursuant to the applicable standards, and (c) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.

Elizabeth Salomone

Elizabeth Salomone

October 6, 2025

Date

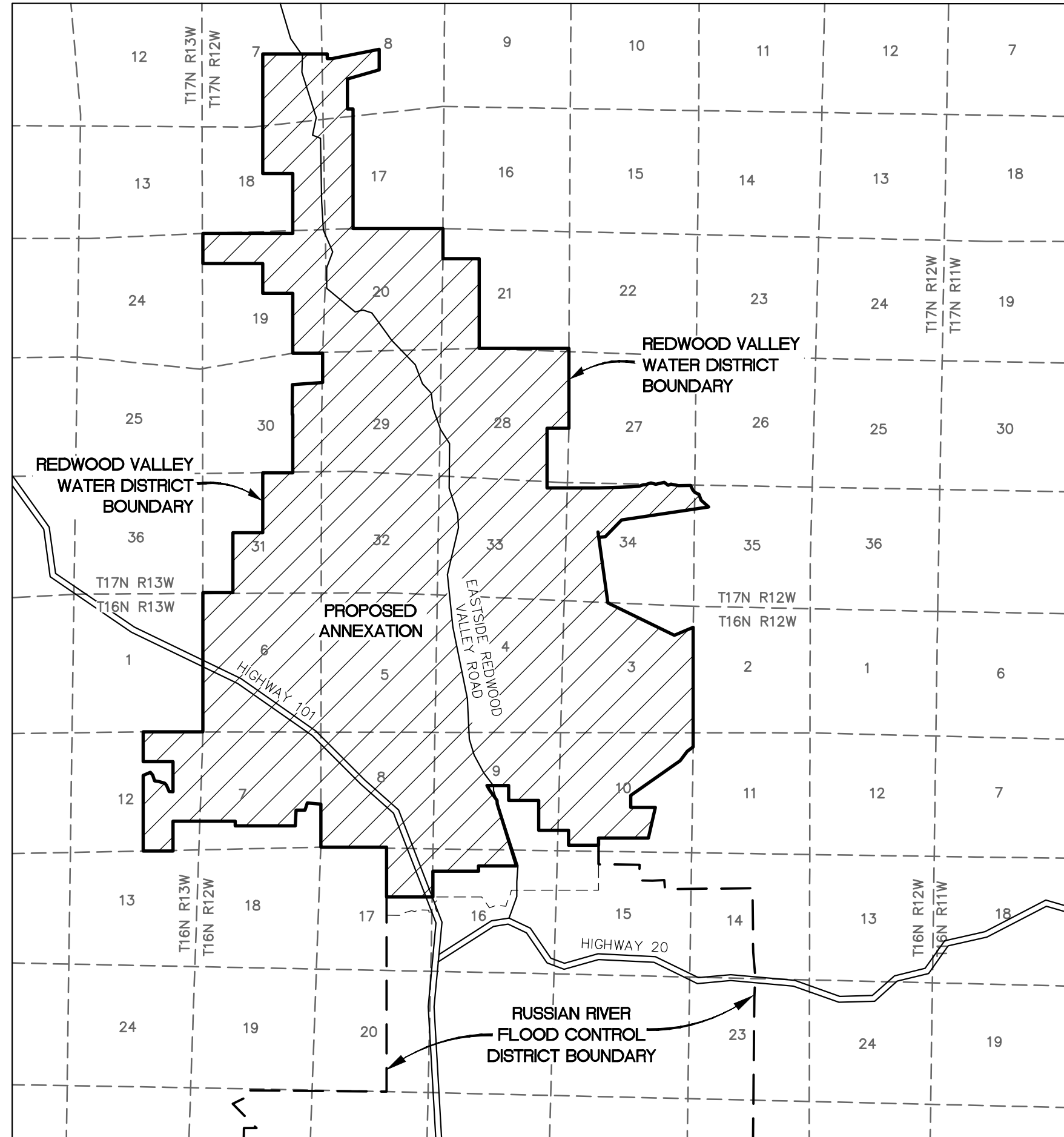
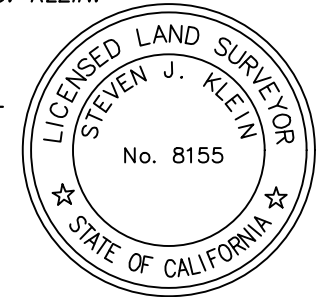


EXHIBIT "A"
TO NEGATIVE DECLARATION
MAP OF RVCWD AREA TO BE ANNEXED INTO RRFC
October 6, 2025

THIS MAP HAS BEEN PREPARED BY STEVEN J. KLEIN.

Steven J. Klein 06/18/25
STEVEN J. KLEIN, P.L.S. 8155



LEGEND

- BOUNDARY OF LANDS TO BE ANNEXED
- EXISTING BOUNDARY OF RUSSIAN RIVER FLOOD CONTROL DISTRICT
- SECTION LINES
- OVERLAP OF RVCWD & RRFC

MUNSELLE CIVIL ENGINEERING
CIVIL ENGINEERING & LAND SURVEYING
513 CENTER STREET
HEALDSBURG, CA 95448
(707) 395-0968



LAFCO SITE PLAN
REDWOOD VALLEY COUNTY WATER DISTRICT
REDWOOD VALLEY, CA

JOB NO.
129-25

SHEET NO.
1
OF 1 SHEETS

Resolution #25-02

of the

Redwood Valley County Water District

**Resolution of Support for the
Mendocino County Russian River Flood Control
& Water Conservation Improvement District**

**Request to the
Mendocino County Local Agency Formation Commission
to Initiate Proceedings for the Annexation
of the Redwood Valley County Water District Boundary**

WHEREAS, Mendocino County Russian River Flood Control & Water Conservation Improvement District (RRFC) desires to initiate proceedings pursuant to Part 3 of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (GOV §56000 et seq.) for a Change of Organization consisting of an annexation to incorporate the remaining jurisdictional boundaries of the Redwood Valley County Water District (RVCWD) not already located within the RRFC jurisdictional boundary, as set forth in the attached Exhibit A attached hereto and incorporated herein by reference.

WHEREAS, the RVCWD Board is dedicated to creating a lasting solution for the Redwood Valley community that will support increased water supply reliability for our agricultural community.

WHEREAS, the RVCWD Board wishes to convey to the Mendocino Local Agency Formation Commission its support in being annexed into RRFC in order to enable the RVCWD to enter into a Uniform Water Supply & Purchase Agreement with RRFC; thereby creating a more reliable water supply for RVCWD.

WHEREAS, both RRFC and RVCWD wish to partner in an annexation application as evidenced by the following actions:

1. On April 1, 2024, RRFC adopted Resolution No. 24-01, a *Commitment to Collaborate with Redwood Valley County Water District in Developing a Local Agency Formation Commission Annexation Application*; and
2. Subsequently, on April 18, 2024, RVCWD adopted a similar resolution (Resolution No. 24-01); and

3. RRFC and RVCWD entered a Memorandum of Understanding (MOU) to identify roles and responsibilities for development of an annexation application to the LAFCo, effective August 1, 2024.

WHEREAS, eligibility for the proposed annexation includes:

1. The proposed annexation area is within the RRFC current LAFCo approved Sphere of Influence; and
2. The proposed annexation area is within RRFC's State Water Resources Control Board water right license 13898 place of use.

WHEREAS, the reasons for the proposed annexation are as follows:

1. RRFC can currently only provide RVCWD water surplus to RRFC customer demand when available as outlined in the 1980 Superior Court of the State of California No 42059 Stipulated Judgement and pursuant to California State Water Resources Control Board Water Right Order WR 79-15; and
2. Annexation of RVCWD into the RRFC boundary would allow for regular contracting of water under a Uniform Water Supply & Purchase Agreement, creating a more stable water supply for the RVCWD.

WHEREAS, the proposed annexation would be subject to the following terms and conditions:

1. It would not consist of a consolidation of services nor a consolidation of RRFC and RVCWD.
2. It would not negate, supersede, or otherwise impact the Stipulated Judgment No 42059.

WHEREAS, the Board has considered the oral and/or written testimony for adoption of this Resolution of Support.

NOW, THEREFORE, BE IT RESOLVED, by the RVCWD Board of Directors as follows:

This Resolution is hereby approved and adopted by the RVCWD Board in support of the RRFC request for Mendocino County Local Agency Formation Commission to initiate proceedings for the proposed annexation described herein in the manner provided by the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000; and

ADOPTED 17 day of April 2025, by the Board of Directors of the Redwood Valley County Water District, by the following vote:

ADAM GASKA

☒ Yes / No / Abstain / Absent

KEN TODD

☒ Yes / No / Abstain / Absent

TOM SCHOENEMAN

☒ Yes / No / Abstain / Absent

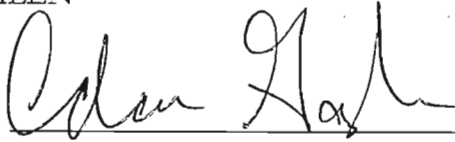
BREE KLOTTER

☒ Yes / No / Abstain / Absent

DEREK DAHLEN

☒ Yes / No / Abstain / Absent

Signed:



Adam Gaska, Board President

4/17/2025
Date

Attest:

Kim Saylor
KS

4/17/2025
Date



April 2, 2026

Mendocino Local Agency Formation Commission (LAFCo)
200 S School Street, Ste. 2
Ukiah, CA 95482

SUBJECT: Russian River Flood Control and Conservation Improvement District (RRFC) Application

Dear LAFCo Commissioners:

The Ukiah Valley Water Authority (UVWA) wishes to voice its support of the application of Russian River Flood Control and Conservation Improvement District (RRFC) to Mendocino Local Agency Formation Commission (LAFCo) to annex the entirety of Redwood Valley County Water District (RVCWD) into its boundaries. If the annexation application is approved, RVCWD would be able to directly use the 328.85 Acre Feet of water contracted through a Uniform Water Supply & Purchase Agreement with RRFC. The proposed annexation would afford RVCWD a measured level of water security to supply its customers, domestic and agricultural.

UVWA was founded under the principle that collaborating to combine and coordinate the operations of our respective water systems into a Combined Water System is in the best interest of all water districts within the Greater Ukiah Valley. It is recognized that all member agencies of the UVWA benefit through the coordinated use of their respective water resources and water systems.

Redwood Valley County Water District has been jurisdictionally restricted to fully benefit from the 328.85 acre feet of water it has contracted through a Uniform Water Supply & Purchase Agreement with RRFC due to large portions of its district boundaries lying outside of the district boundaries of RRFC. RVCWD and RRFC seek to remedy that restriction by seeking approval by LAFCo to allow RRFC to fully annex RVCWD, to make their district boundaries coterminous.

In the spirit of collaboration and cooperation, the UVWA supports the application to Mendocino LAFCo for RRFC to fully annex RVCWD and urges Mendocino LAFCo to approve the application for annexation.

Signed,

Two handwritten signatures. The top one is in black ink and appears to read "Tim Prince". Below it is a signature in blue ink, which is less legible but appears to be the same name.

Tim Prince, Vice Chair
Ukiah Valley Water Authority
Water Executive Committee

**Russian River Flood Control
2016-2025 Reported Water Use
Under State Water Resources Control Board Issued
Water Right License 13898**

	Jan	Feb	March	April	May	June	July	August	Sept	Oct	Nov	Dec	Total
2016:													
Contracted	16.06	26.94	20.76	34.19	104.97	511.07	678.52	826.11	484.59	189.71	24.86	18.45	2,936.22
Surplus to Redwood Valley	-	4.86	6.63	16.91	35.29	95.81	231.32	204.08	114.59	54.50	34.25	17.68	815.92
Totals	16.06	31.80	27.39	51.10	140.26	606.88	909.84	1,030.19	599.18	244.21	59.11	36.13	3,752.14

2017													
Contracted	15.69	12.82	15.16	16.40	50.33	229.72	854.07	874.26	620.25	473.56	78.99	37.06	3,278.30
Surplus to Redwood Valley	-	-	9.51	10.13	50.33	162.65	251.96	337.58	217.28	115.70	-	-	1,155.14
Totals	15.69	12.82	24.67	26.53	100.66	392.37	1,106.03	1,211.84	837.53	589.26	78.99	37.06	4,433.44

2018													
Contracted	13.48	18.98	104.16	68.17	141.35	412.00	722.97	1,082.40	773.95	413.14	203.85	21.98	3,976.43
Surplus to Redwood Valley	-	48.75	46.45	39.10	24.66	153.86	290.52	295.54	164.64	47.20	49.41	3.70	1,163.83
Totals	13.48	67.73	150.61	107.27	166.01	565.86	1,013.49	1,377.94	938.59	460.34	253.26	25.68	5,140.26

2019													
Contracted	46.91	36.25	120.41	68.78	139.28	280.62	626.45	892.89	826.25	463.04	214.47	90.88	3,806.23
Surplus to Redwood Valley	-	4.86	6.63	16.91	35.29	95.81	231.32	204.08	114.59	54.50	34.25	17.68	815.92
Totals	46.91	41.11	127.04	85.69	174.57	376.43	857.77	1,096.97	940.84	517.54	248.72	108.56	4,622.15

2020													
Contracted	62.22	71.88	243.86	140.22	162.06	340.94	766.44	728.62	603.13	618.07	164.50	85.51	3,987.44
Surplus to Redwood Valley	-	-	171.63	111.42	86.60	208.20	299.59	287.92	194.55	145.83	32.04	45.24	1,583.02
Totals	62.22	71.88	415.49	251.64	248.66	549.14	1,066.03	1,016.54	797.68	763.90	196.54	130.75	5,570.46

**Russian River Flood Control
2016-2025 Reported Water Use
Under State Water Resources Control Board Issued
Water Right License 13898**

	Jan	Feb	March	April	May	June	July	August	Sept	Oct	Nov	Dec	Total
2021													
Contracted	14.44	34.89	172.35	243.27	244.23	302.64	492.51	656.52	518.09	289.75	58.23	33.54	3,060.45
Surplus to Redwood Valley	51.19	15.47	62.51	241.23	113.07	-	14.36	-	15.81	-	-	-	513.64
Totals	65.63	50.36	234.86	484.50	357.30	302.64	506.87	656.52	533.90	289.75	58.23	33.54	3,574.09

2022													
Contracted	62.32	85.85	309.10	240.30	286.03	360.61	674.11	817.52	565.22	358.85	177.47	101.62	4,038.98
Surplus to Redwood Valley	-	-	16.02	-	13.99	-	-	29.45	75.49	50.80	38.85	53.74	278.34
Totals	62.32	85.85	325.12	240.30	300.02	360.61	674.11	846.97	640.71	409.65	216.32	155.36	4,317.32

2023													
Contracted	107.97	96.77	120.41	140.80	204.86	318.34	542.82	746.86	530.73	289.31	179.82	135.91	3,414.59
Surplus to Redwood Valley	-	-	-	31.60	42.72	94.48	173.04	174.10	81.91	13.89	-	14.46	626.20
Totals	107.97	96.77	120.41	172.40	247.58	412.82	715.86	920.96	612.64	303.20	179.82	150.37	4,040.79

2024													
Contracted	153.68	125.26	142.79	193.18	533.49	806.17	1,121.69	966.95	727.10	257.70	39.50	10.28	5,077.77
Surplus to Redwood Valley	59.75	46.47	116.91	265.15	179.06	117.76	82.13	-	-	82.13	-	-	949.36
Totals	213.43	171.73	259.70	458.33	712.55	923.93	1,203.82	966.95	727.10	339.83	39.50	10.28	6,027.13

2025													
Contracted	48.23	10.29	12.61	47.07	137.00	206.02	520.86	642.80	468.51	TBD	TBD	TBD	2,020.72
Surplus to Redwood Valley	13.39	14.86	14.69	6.98	68.76	168.42	172.40	159.25	104.84	34.01	20.08	18.58	796.26
Totals	61.62	25.15	27.30	54.05	205.76	374.44	693.26	802.05	573.35	TBD	TBD	TBD	2,816.98

NOTE: State Water Resources Control Board annual reporting period changed from calendar year to water year in 2022. Therefore, reported annual totals in the State's tracking system (CalWATRS) will not match for every year as shown.

**REVISED
INITIAL STUDY
AND
PROPOSED NEGATIVE DECLARATION
FOR**

**MENDOCINO COUNTY RUSSIAN RIVER FLOOD
CONTROL AND WATER CONSERVATION
IMPROVEMENT DISTRICT REDWOOD VALLEY
ANNEXATION**

Prepared for:
**Mendocino County Russian River Flood Control
and Water Conservation Improvement District**
PO Box 2104
Ukiah, CA 95482

Original Date June 29, 2025
Revised Date September 4, 2025

**MENDOCINO COUNTY RUSSIAN RIVER FLOOD CONTROL
AND WATER CONSERVATION IMPROVEMENT DISTRICT
PUBLIC NOTICE OF INTENT TO ADOPT PROPOSED NEGATIVE DECLARATION**

The Mendocino County Russian River Flood Control and Water Conservation Improvement District (“**RRFC**”) prepares, makes, declares and publishes this proposed Negative Declaration for the Mendocino County Russian River Flood Control and Water Conservation Improvement District Redwood Valley Annexation (“**Project**”).

Project Description: Filing of an application with the Mendocino County Local Agency Formation Commission to annex the Redwood Valley County Water District (“**RVCWD**”) into the boundaries of the RRFC. The Project Description is more fully set forth in the Initial Study for the Project. The main purpose of the annexation is to allow RVCWD to put water available under its contract with the RRFC to beneficial use anywhere within the RVCWD boundaries.

Project Location: The Project is located within Mendocino County as shown on the map attached as **EXHIBIT “A”**.

Determination: The RRFC has reviewed the proposed Project and has determined that the Project, as identified in the attached Initial Study, will not have a significant effect on the environment. An Environmental Impact Report is not required pursuant to the Environmental Quality Act of 1970 (Division 13 of the California Public Resources Code).

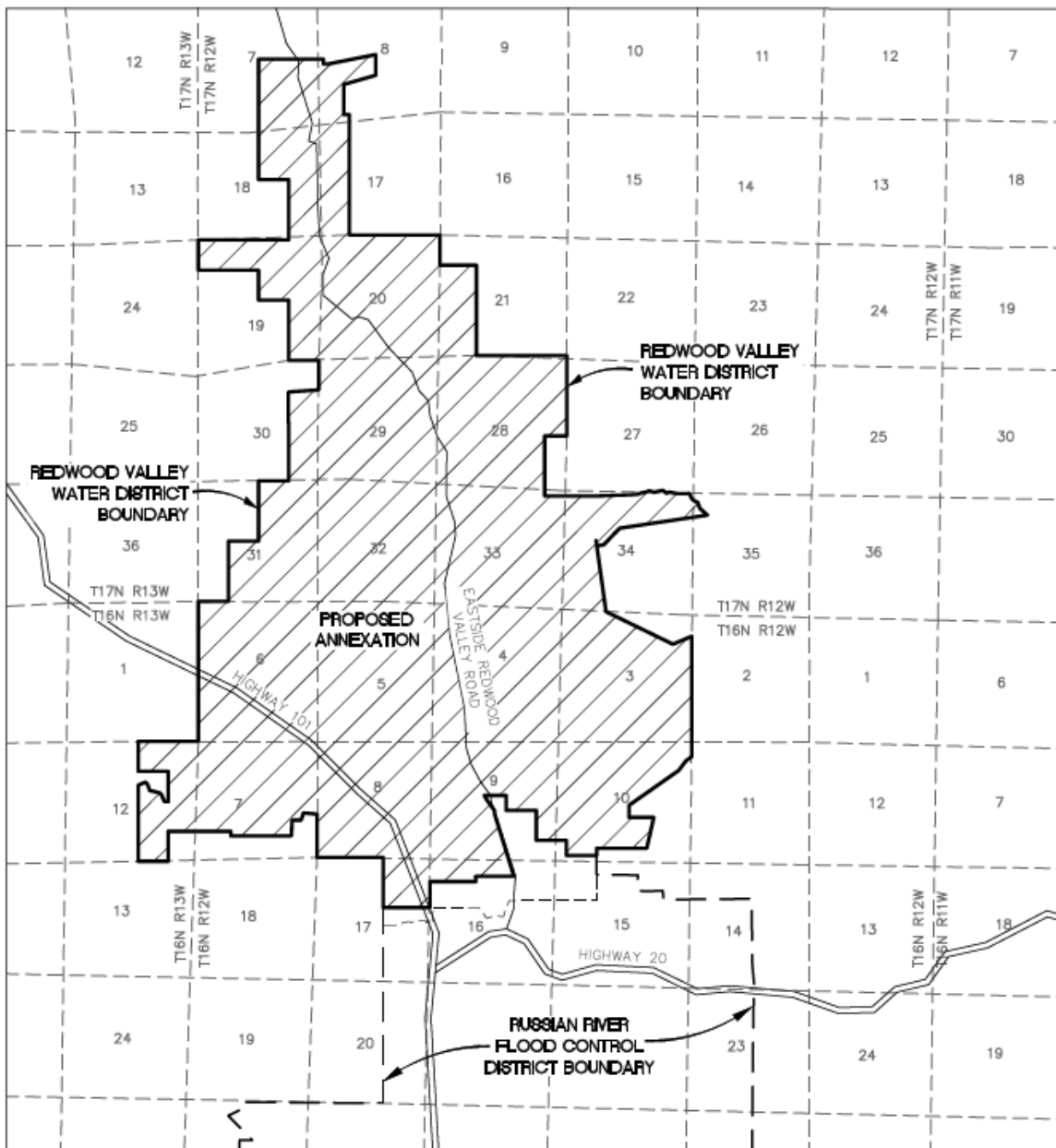
Public Review: The Initial Study/Negative Declaration has been prepared in compliance with the California Environmental Quality Act and contains an environmental review of the potential impacts of the proposed Project. This Initial Study/Negative Declaration is being circulated for 30-day period from June 29, 2025, through July 29, 2025. Comments on the Initial Study/Negative Declaration may be sent by 12:00 noon on July 29, 2025, to the RRFC, Attention: Ms. Elizabeth Salomone, PO Box 2104, Ukiah, CA 95482, DistrictManager@rrfc.net. Comments will be reviewed by the RRFC, and the Initial Study/Negative Declaration will be revised, as appropriate, prior to the adoption of the proposed Negative Declaration by the RRFC, which is scheduled for October __, 2025.

This environmental review process and Negative Declaration filing is made pursuant to Title 14, Division 6, Chapter 3, Article 6 of the California Administrative Code Section 15070.

A copy of the Initial Study and Proposed Negative Declaration may be reviewed at the RRFC office at 304 North State Street, Ukiah, California, 95482.



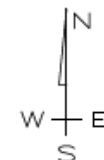
Elizabeth Salomone, General Manager



**EXHIBIT "A" TO NOTICE OF INTENT TO ADOPT
PROPOSED NEGATIVE DECLARATION
MAP OF RVCWD AREA TO BE ANNEXED INTO RRFC**

THIS MAP HAS BEEN PREPARED BY STEVEN J. KLEIN.

Steven J. Klein 06/18/25
STEVEN J. KLEIN, P.L.S. 8155



LEGEND

- BOUNDARY OF LANDS TO BE ANNEXED
- - - - - EXISTING BOUNDARY OF RUSSIAN RIVER FLOOD CONTROL DISTRICT
- SECTION LINES
- - - - - OVERLAP OF RVCWD & RRFC

MUNSELLE CIVIL ENGINEERING
CIVIL ENGINEERING & LAND SURVEYING
513 CENTER STREET
HEALDSBURG, CA 95448
(707) 395-0068



LAFCO SITE PLAN
REDWOOD VALLEY COUNTY WATER DISTRICT
REDWOOD VALLEY, CA

JOB NO.
129-25

SHEET NO.
1
OF 1 SHEETS

[PROPOSED]
**MENDOCINO COUNTY RUSSIAN RIVER FLOOD CONTROL
AND WATER CONSERVATION IMPROVEMENT DISTRICT
NEGATIVE DECLARATION REGARDING ENVIRONMENTAL IMPACT**

1. NOTICE IS HEREBY GIVEN that the Project described below has been reviewed pursuant to the provisions of the California Environmental Quality Act of 1970 (Public Resources Code Section 21100, et seq.) and a determination has been made that it will have no significant effect upon the environment.
2. PROJECT NAME: Mendocino County Russian River Flood Control and Water Conservation Improvement District Redwood Valley Annexation Project (“**Project**”).
3. DESCRIPTION OF THE PROJECT: Filing of an application with the Mendocino County Local Agency Formation Commission to annex the Redwood Valley County Water District (“**RVCWD**”) into the RRFC. The Project Description is more fully set forth in the Initial Study for the Project. The main purpose of the annexation is to allow RVCWD to put water available under its contract with the RRFC to beneficial use anywhere within the RVCWD boundaries.
4. LOCATION OF PROJECT: The Project is located within Mendocino County as shown on the areas identified on the map attached as **EXHIBIT “A”**.
5. NAME AND ADDRESS OF PROJECT PROPONENT: Mendocino County Russian River Flood Control and Water Conservation Improvement District, PO Box 2104, Ukiah, CA 95482, (707) 462-5278.
6. MITIGATION MEASURES: None.
7. A copy of the Initial Study regarding the environmental effect of this Project is on file at the RRFC office at 304 North State Street, Ukiah, California, 95482. This study was:
 - ☐ Adopted as presented.
 - ☐ Adopted with changes. Specific modifications supporting reasons are attached.
8. The RRFC considered this Negative Declaration at a public meeting of its Board of Directors on October _____, 2025.
9. DETERMINATION: *(To be completed by the Lead Agency)*.

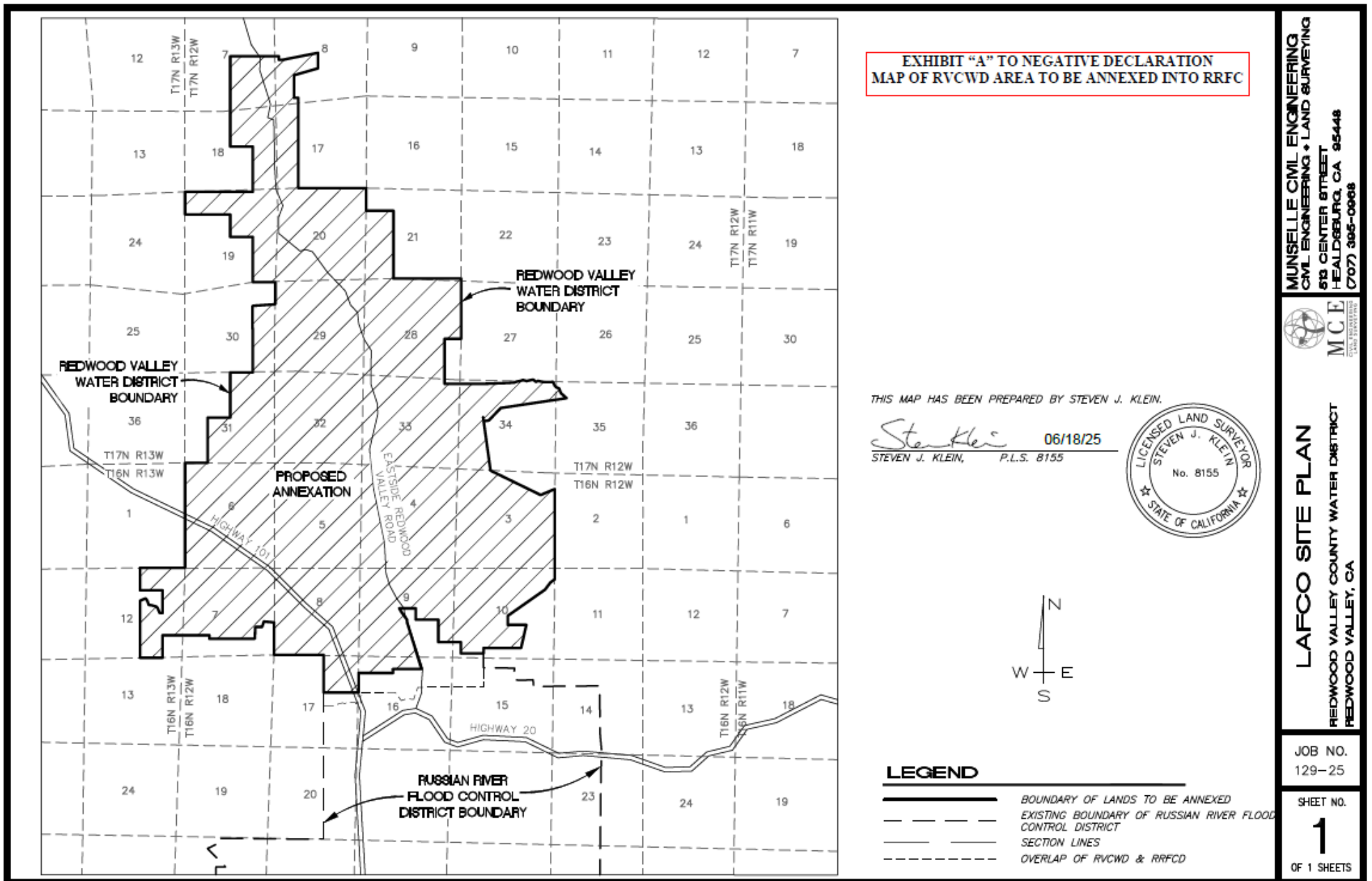
On the basis of this initial evaluation:

- X I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- ☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards; and (2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (1) have been adequately analyzed in an earlier EIR or NEGATIVE DECLARATION pursuant to the applicable standards, and (c) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.

Elizabeth Salomone

Date



**INITIAL STUDY
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1. SUMMARY

Project Title: Mendocino County Russian River Flood Control and Water Conservation Improvement District Redwood Valley Annexation Project

Project Location: Mendocino County

Lead Agency: Mendocino County Russian River Flood Control and Water Conservation Improvement District

Agency Carrying Out Project: Mendocino County Russian River Flood Control and Water Conservation Improvement District

Contact Person: Elizabeth Salomone
General Manager
Mendocino County Russian River Flood Control and Water Conservation Improvement District
PO Box 2104, Ukiah, CA 95482
Telephone: (707) 462-5278

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

- | | | |
|---|---|---|
| ☐ Aesthetics | ☐ Agriculture and Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Geology/Soils |
| ☐ Greenhouse Gas Emissions | ☐ Hazards & Hazardous Materials | ☐ Hydrology/Water Quality |
| ☐ Land Use/Planning | ☐ Mineral Resources | ☐ Noise |
| ☐ Population/Housing | ☐ Public Services | ☐ Recreation |
| ☐ Transportation/Traffic | ☐ Utilities/Service Systems | ☐ Mandatory Findings of Significance |

Organization of the Initial Study

This Initial Study contains the following sections:

Chapter 1 – Summary. Provides information about the proposed Project location, lead agency, and identification of environmental issues determined to be “Potentially Significant Impacts” as indicated by the Environmental Checklist contained in Section 4.

Chapter 2 – Project Description. Describes the Project location, surrounding land uses, Project objectives, and characteristics of the proposed project.

Chapter 3 – Environmental Checklist. Contains the Environmental Checklist presented in Appendix G of the CEQA Guidelines. The checklist is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the Checklist.

Chapter 4 – Consultation with Responsible Agencies Summarizes informal consultation with the State Water Resources Control Board.

Chapter 5 - Determination. States the determination by the Lead Agency. In this case, The Mendocino County Russian River Flood Control and Water Conservation Improvement District is proposing that a Negative Declaration be adopted for the proposed Project.

2. PROJECT DESCRIPTION

Project Objectives

The project is the filing of an application to the Mendocino County Local Agency Formation Commission (“**LAFCo**”) to annex the remaining portion of the Redwood Valley County Water District (“**RVCWD**”) into the boundaries of the Mendocino County Russian River Flood Control and Water Conservation Improvement RRFC (“**RRFC**”). The size of RVCWD’s service area is roughly 15 square miles in a valley 5 miles long by 3 miles wide. Approximately 200 acres of RVCWD’s service area is already within RRFC, and RVCWD holds a Uniform Water Sale and Purchase Agreement (“**Agreement**”) with RRFC for 328.85 acre feet annually. RRFC seeks to annex the remaining portion of RVCWD to allow RVCWD to utilize water available under the Agreement anywhere within RVCWD.

RRFC’s water right license issued by the State Water Resources Control Board (“**License**”) authorizes domestic, municipal, industrial, irrigation, and recreational uses within the RRFC’s service area and further authorizes the RRFC to supply *surplus* water supplies to RVCWD. As a result, RVCWD has expressed its desire to have its entire service area annexed into the RRFC to become an in-District customer which would allow it to (1) utilize its current contracted supply anywhere within its boundaries, and (2) have its entire service area have access to surplus water on par with other RRFC customers.

Project Area

The proposed Project would occur within Mendocino County and would alter the boundaries of the RRFC to include the complete boundaries of RVCWD. The area to be annexed is specifically depicted in **Exhibit A**.

Existing Conditions

RRFC is located entirely in Mendocino County. The service area boundaries of RRFC include 51,000 acres of a larger 312,675-acre sphere of influence. RRFC provides raw water for irrigation and to municipal water purveyors within its boundaries. When treatment is required, the municipal service provider treats and distributes the water to its customers. RRFC's License currently serves as its only surface water supply.

RVCWD provides domestic and agricultural water services to the community of RVCWD, including a total of 1,005 equivalent dwelling units and 197 agricultural customers across a roughly 15 square mile service area (MSR 2016). RVCWD's water supply consists of (1) a permit (Permit 17593) to divert water from Lake Mendocino under very limited conditions, (2) its Agreement with RRFC for 328.85 acre feet of water annually that can be used in that portion of approximately 200 acres of RVCWD located within the boundaries of RRFC, and (3) surplus water available from RRFC exceeding RRFC's customers' needs pursuant to Stipulated Judgment No. 42059 dated May 21, 1980. The current general plan land use designations for RVCWD are included below as **Figure a**.

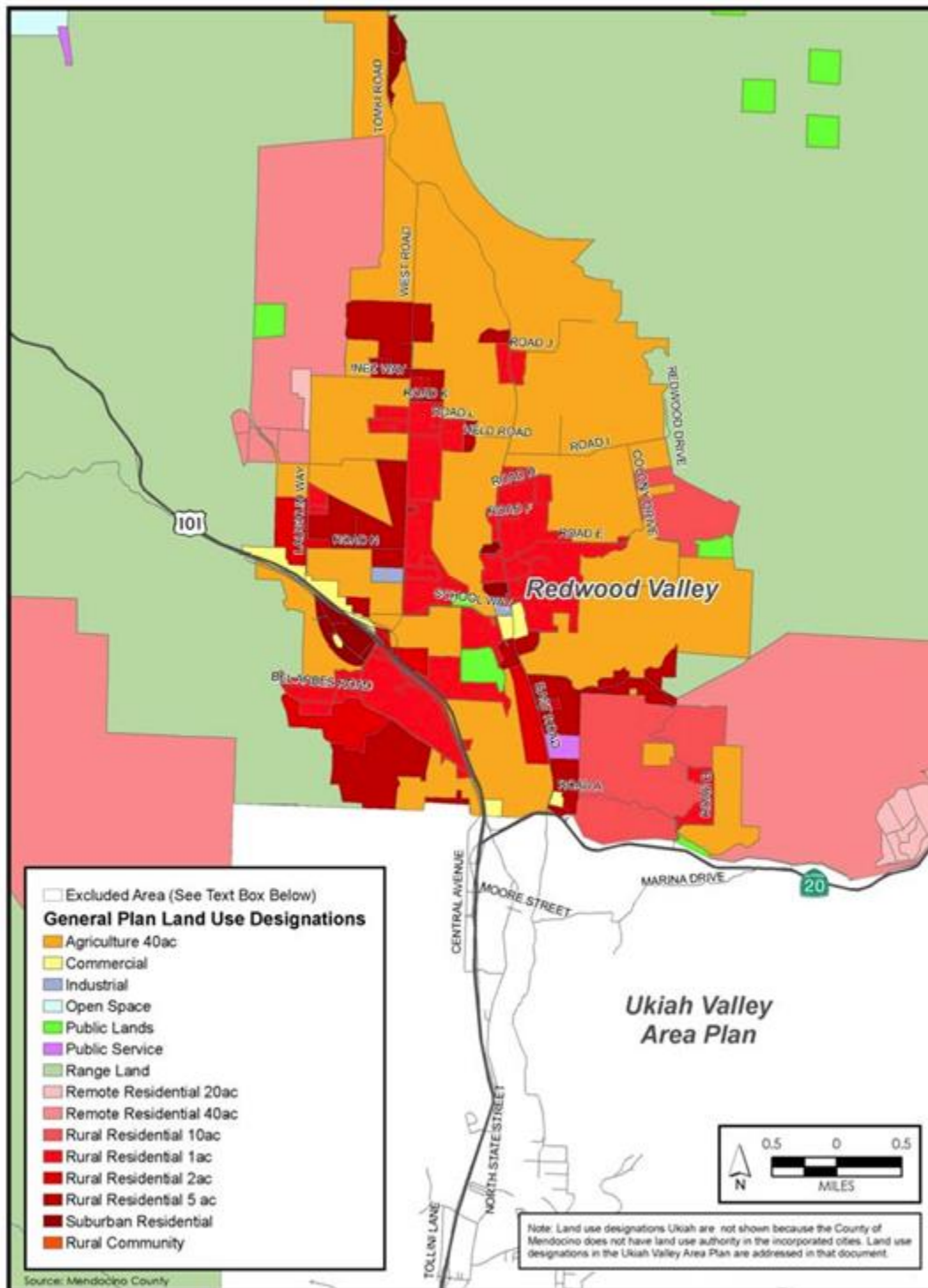
RVCWD is currently under a court-ordered moratorium for domestic water connections (**Appendix 1**) and a self-imposed moratorium for irrigation connections.. In 2013, Mendocino county LAFCO concluded regarding RVCWD:

The annual demand is approximately 750 AF domestic and 1,450 AF for irrigation, a total of 2,200 AF. The RVCWD maintains a 68-acre-foot storage tank of untreated water from which water is transmitted to the water treatment plant to produce domestic water. The plant has a capacity of 1.7 million gallons per day. The RVCWD's supply consists of a right to divert up to 4,900 AF from Lake Mendocino if flow at the confluence of the forks of the Russian River exceeds 72,000 AF. It is estimated that water will be available for 70 days in wet years and one or two days in dry years. As a result of the uncertain supply, the RVCWD is under a moratorium for new domestic and irrigation connections. *Ukiah Valley Special Districts Final Municipal Service Review, May 6, 2013.*

Currently, the health and safety needs of RVCWD's domestic customers are being met with purchased water from the Millview County Water District. During the irrigation seasons of 2021-2022, there was no surplus water available from RVCWD for existing agricultural customers who were operating solely on storage ponds and groundwater.

In 2024, RVCWD became a member of the Ukiah Valley Water Authority, a joint powers authority pursuing consolidation of Ukiah Valley's municipal water suppliers. The UVWA would offer coordinated use of each member's respective water supplies and systems to maximize availability.

a. General Plan Land Use Designation for broader RVCWD Community Planning Area



Project Characteristics

The Project will consist of submission of an annexation application to LAFCo requesting annexation of the complete service area of RVCWD, as depicted on **Exhibit B**, into the RRFC. All areas proposed to be annexed lie within the RRFC's existing Sphere of Influence (**Exhibit C**).

LAFCo will provide public notification to advise interested persons of the annexation application. Prior to acting upon any Petition for annexation, LAFCo must comply with the requirements of the California Environmental Quality Act ("CEQA"). For purposes of CEQA, the RRFC is the lead agency, and LAFCo is a responsible agency.

Changes Resulting from Project

If all of RVCWD is annexed into RRFC the one immediate change would be that RVCWD can use the 328.85 acre feet under its Agreement with RRFC anywhere within its boundaries as RVCWD is already within RRFC's licensed place of use. As mentioned, there is currently no more water available to contract from RRFC – so the amount of water available under RVCWD's Agreement cannot currently be expanded, and will remain at 328.85 even after annexation. It is *possible* in the future that if customers under existing Agreements decide to reduce the amount under their contract, additional water *could be available* for other customers to add to the amount of their Agreements. Such an occurrence is speculative at this point in time.

If RVCWD is annexed into RRFC, the only other immediate change would be that RVCWD can use available RRFC "surplus" water anywhere within its boundaries as it would now be within RRFC's boundaries and is already within RRFC's licensed place of use. RRFC's "surplus" water, as set forth in the Agreement, is water temporarily available under RRFC's licensed water right in excess of the amount necessary for RRFC to meet the demands of its Agreement customers. Because all RRFC water is currently contracted for under Uniform Agreements, this means that customer(s) would have to inform RRFC that they would not need all their contracted water in the upcoming season. This process is set forth in Section 3.2 of the Agreements. Currently, RVCWD is able to participate in this surplus water process on an equal basis with other existing customers for that portion of the district within RRFC. As set forth in the Agreement, if existing RRFC customers turn back some of their contract entitlement, that water is made available to all customers on a pro-rata basis. Without annexation, RVCWD can put such surplus water to use only in that portion of RVCWD already within RRFC; with annexation, RVCWD could put surplus water available under its Uniform Agreement to beneficial use anywhere within its boundaries.

Because the terms and conditions of RVCWD's Agreement would remain in place, the proposed annexation of RVCWD could have no adverse impact on RRFC's existing customers, agricultural or municipal, as shortage provisions are built into the Uniform Agreements and apply uniformly to all RRFC customers. The only way that RVCWD could increase its Uniform Agreement is if in the future existing RRFC customers reduce the quantity of water they have under contract or terminate their contract; under those circumstances, RVCWD would be eligible for a pro-rata share

of that additional amount along with all other RRFC customers, the same as it would be today without annexation.

RRFC currently treats all of its customers equally. Shortage provisions in the Uniform Agreement currently provide:

11.2 Allocation of Shortage. In the event that a shortage condition from any cause is declared by the District with respect to its water rights or supply in Lake Mendocino and the east fork of the Russian River, and evidence of such shortage condition is of sufficient magnitude, in the District's sole opinion or findings, to require a reduction in diversions by District pursuant to its Permit, then District shall be entitled to reduce the amount of District Water it is required to deliver to Customer pursuant to the terms of this Agreement in the manner set forth below without any form or manner of liability. Customers will share pro rata in the reduction in District's allowed diversions from the Russian River and/or Lake Mendocino, as the case may be.

11.3 Declaration and Notice. In the event of a shortage pursuant to Section 11.2 above, District shall deliver a written "Notice of Impending Shortage" to Customer, informing Customer of the amount of reduction in District Water for the period in question, which shall be binding on Customer. Within thirty (30) days of delivery of such a Notice of Impending Shortage, District shall notice and conduct a public meeting to meet and confer with its customers in an effort to determine the terms and provisions under which District will deliver District Water to Customers for the period during which the shortage condition prevails.

11.4 Water Shortage Emergencies. Notwithstanding Section 11.2 above, the District may allocate District Water to its Customers as set forth in Article 9 of Ordinance #25-01 if a water shortage emergency has been declared pursuant to Water Code section 350. In the event of such an emergency water shortage, District shall comply with the notice, hearing, and other requirements set forth in Division 1 Chapter 3 of the California Water Code.

Article 9 of Ordinance #25-01 provides in pertinent part: "During any period of threatened or actual water shortage, the District has the right to apportion its available District Water supply among Customers in a manner that appears most equitable with due regard to public health and safety". Historically, RRFC has imposed shortages on its customers on a pro-rata basis; it has never treated agricultural and municipal customers differently.

It should be noted that RRFC already has existing Agreements with numerous municipal water suppliers, including Millview County Water District, Redwood Valley County Water District, Calpella County Water District, Russian River Estates, Rogina Mutual Water, Hopland Public Utility District, and Willow County Water District. RRFC acknowledges that in water short years it is possible that domestic users will be entitled to health and safety water even when other use types have been curtailed. In prior droughts, it is our understanding that the State Water Resources Control Board Division of Water Rights (**Division**) staff authorized RVCWD to divert water for health & safety needs regardless of its rights or contract priorities. Therefore, the State has already imposed a priority for RVCWD even without RVCWD being in RRFC. Because this priority was

granted before the proposed Project, it is part of the CEQA base case; in addition, the action was taken by the Division and was not taken by RRFC. Annexing RVCWD would not change RRFC's method of allocation water under the Uniform Agreement, or its method of imposing shortages.

3. ENVIRONMENTAL CHECKLIST

The following checklist is the form presented in appendix G of the CEQA Guidelines. The checklist form is used to describe the impacts of the proposed project. A discussion follows each environmental issue identified in the checklist. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant.

For this checklist, the following designations are used:

Potentially Significant Impact: "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

Potentially Significant Unless Mitigation Incorporated: "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact."

Less-Than-Significant Impact: Any impact that would not be considered significant under CEQA relative to existing standards. If no significant impacts are identified, a Negative Declaration would be prepared.

No Impact: The project would not have an impact.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
I. <u>AESTHETICS</u> -- <i>Would the project:</i>				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
buildings within a state scenic highway?				
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☐	X
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	☐	☐	☐	X

Discussion

a - d) The Project involves annexation of RVCWD into the RRFC. No construction, land alterations, or changes in land uses are planned or involved. Therefore, the Project would have no impact on aesthetics.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
--------	--------------------------------------	--	------------------------------------	--------------

II. AGRICULTURE AND FORESTRY RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
the California Air Resources Board. <i>Would the project:</i>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	X
d) Result in the loss of forestland or conversion of forest land to non-forest use?	☐	☐	☐	X
e) Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	X

Discussion

a-e) The Project involves annexation of RVCWD into the RRFC. No change in land use will occur as a result of that action. The Project would allow RVCWD to utilize its existing Agreement supply within its entire service area. RVCWD includes 9,610 acres in its service area, the available 328.85 acre feet is insignificant as it would provide less than 0.004 acre feet of water per acre. Conversely, the proposed project would have no adverse impact on agricultural use within either RVCWD or RRFC. Farming practices on the annexed parcels are not anticipated to change following

annexation. Therefore, the Project would have no impact on agriculture or forestry resources within RVCWD.

Similarly, the Project should have no impact on agricultural uses within RRFC. The concern that annexing RVCWD could harm RRFC's existing agricultural customers is a critical consideration. The District understands the concern that Water Code Section 106, which establishes a "priority of right" for domestic use over agricultural use, could subordinate agricultural water supply to domestic needs. However, this is not a new issue created by the Project. The potential for population growth and increased domestic water use exists whether or not RVCWD is annexed into RRFC, as RRFC currently includes numerous municipal suppliers as customers. The conclusion of no significant impact to RRFC agricultural users is based upon the facts in the record that annexation (1) will not increase the amount of water available to RVCWD, (2) will not provide RVCWD with a more reliable water supply that would allow it to lift either of the currently imposed moratoria, (3) will not result in any reduction in supply to RRFC current customers, and (4) will not result in shortages being imposed upon RRFC's agricultural customers for the benefit of domestic users.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
III. <u>AIR QUALITY</u> – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determination. <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	X
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	X
d) Expose sensitive receptors to	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
substantial pollutant concentrations?				X
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	X

Discussion

a-e) The Project involves annexation of RVCWD into the RRFC. No construction, land alterations, or changes in land uses are planned or involved. Therefore, the Project would have no impact on air quality.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<u>IV. BIOLOGICAL RESOURCES --</u> <i>Would the project:</i>				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	X
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	X
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	X
f) Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	X

Discussion

a-f) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are planned or involved. RVCWD is currently under a court-ordered moratorium for domestic water connections and a self-imposed moratorium for irrigation connections due to water supply instability, so no change in land use is anticipated. No change is contemplated to the RRFC's diversion facilities, either in quantity or time of diversion. Therefore, the Project would have no impact on biological resources.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
V. <u>CULTURAL RESOURCES</u> -- <i>Would the project:</i>				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☐	X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☐	X
c) Directly or indirectly destroy a unique	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
paleontological resource or site or unique geologic feature?				
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	X

Discussion

a-d) The Project involves annexation of RVCWD into the RRFC. No construction, land alterations, or changes in land uses are planned or involved. Therefore, the Project would have no impact on cultural resources.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
VI. <u>GEOLOGY AND SOILS</u> – <i>Would the project:</i>				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:	☐	☐	☐	X
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42	☐	☐	☐	X
ii) Strong seismic ground shaking?	☐	☐	☐	X
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	X
iv) Landslides?	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☐	X
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☐	X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	X
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	X

Discussion

a-e) The Project involves annexation of RVCWD into the RRFC. No construction, land alterations, or changes in land uses are planned or involved. Therefore, the Project would have no impact on geology or soils.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
VII. <u>GREENHOUSE GAS EMISSIONS</u>				
<i>-- Would the project:</i>				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	X
b) Conflict with an applicable plan,	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				

Discussion

a-b) The Project involves annexation of RVCWD into the RRFC. No construction, land alterations or changes in land uses are planned or involved that could increase greenhouse gas emissions. Therefore, the Project would have no impact on greenhouse gas emissions.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<u>VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:</u>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	X
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	X
	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	X
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	X

Discussion

a-h) The Project involves annexation of RVCWD into the RRFC. No construction, land alterations or changes in land uses are planned or involved. Therefore, the Project would have no impact on hazardous materials.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<u>IX. HYDROLOGY AND WATER QUALITY</u> -- <i>Would the project:</i>				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	X
b) Substantially deplete groundwater	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or silation on- or off-site?	☐	☐	☐	X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	☐	☐	☐	X
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	X
f) Otherwise substantially degrade water quality?	☐	☐	☐	X
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	X
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	X
i) Expose people or structures to a	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	X

Discussion

a-j) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are involved, and no change in land use is contemplated by the Project that would affect hydrology or water quality in any way. RVCWD is currently under a court-ordered moratorium for domestic water connections and a self-imposed moratorium for irrigation connections so no change in land use is anticipated. The purpose of the annexation is to allow RVCWD to utilize its existing water supply under its Agreement in the entire service area, and to have access to surplus water on par with existing RRFC customers. Therefore, the Project would have no impact on hydrology or water quality.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<u>X. LAND USE AND PLANNING -</u> <i>Would the project:</i>				
a) Physically divide an established community?	☐	☐	☐	X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	X

Discussion

a-c) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are planned or involved, and no change in land use is contemplated by the Project. The Project is likely to allow any existing agricultural acreage to continue in agricultural use. Farming practices on the annexed parcels are not anticipated to change following annexation. RVCWD is currently under a court-ordered moratorium for domestic water connections and a self-imposed moratorium for irrigation connections due to water supply instability so no change in land use is anticipated. The purpose of the annexation is to allow RVCWD to utilize its existing water supply under its Agreement in the entire service area, and to have access to surplus water on par with existing RRFC customers; these changes do not provide increased water supplies, and do not rise to the extent of increased reliability for RVCWD. For the same reason, because RVCWD's water supply will not be increased and will not become more dependable as a result of the proposed Project, the annexation itself cannot provide grounds for the RVCWD to apply to the court to lift the court-imposed moratorium on domestic connections, or to lift its self-imposed moratorium on agricultural connections. Therefore, the Project would have no impact on land use and planning.

<u>XI. MINERAL RESOURCES</u> -- <i>Would the project:</i>	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	X

Discussion

a-b) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are planned or involved, and no change in land use is contemplated by the Project; therefore, the Project would have no impact on mineral resources.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
XII. <u>NOISE</u> –				
<i>Would the project result in:</i>				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	X
b) Exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels?	☐	☐	☐	X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☐	X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	X
f) For a project within the vicinity of a private airstrip, would people in the area be exposed to excessive noise levels?	☐	☐	☐	X

Discussion

a-f) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are planned or involved, and no change in land use is contemplated by the Project; therefore, the Project would have no impact on noise.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XIII. POPULATION AND HOUSING --

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	X

Discussion

a-c) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are planned or involved, and no change in land use is contemplated by the Project. The purpose of the annexation is to allow RVCWD to utilize its existing water supply under its Agreement in the entire service area, and to have access to surplus water on par with existing RRFC customers; while these changes may offer RVCWD some minor relief, they do not provide increased water supplies, and do not rise to the extent of increased reliability for RVCWD. For the same reason, because RVCWD's water supply will not be increased and will not become more dependable as a result of the proposed Project, the annexation itself cannot provide grounds for the RVCWD to apply to the court to lift the court-imposed moratorium on domestic connections, or to lift its self-imposed moratorium on agricultural connections.

Section 15126.2(d) of the CEQA Guidelines requires a discussion of the ways in which a proposed project could be growth-inducing. This section defines a growth-inducing impact:

[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth. . .

A project can have direct and/or indirect growth inducement potential. Direct growth inducement potential would result if a project involved construction of new housing. A project can have

indirect growth-inducement potential if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. An example of this indirect effect would be the expansion of a wastewater treatment plant, which might allow for more development in service areas. This type of growth-inducing effect is typically referred to as a “growth-accommodating impact.”

In accordance with the CEQA definition, the Project could be growth inducing, insofar as it could be used in the future to remove water supply as one obstacle to further urban development and population growth in RVCWD. The growth-inducing potential of a project would generally be considered to have a significant impact if the project either induces unplanned growth or created the capacity for growth to occur above and beyond the levels permitted by public planning policies.

Therefore, it is important to note that the 2009 Mendocino County General Plan, and specifically the RVCWD Community Planning Area, guides future development and land uses within RVCWD’s Sphere of Influence. The additional water supplies that would be available to RVCWD upon annexation would accommodate only a portion of the planned growth identified by the General Plan to occur within the RVCWD Sphere of Influence; it would be insufficient to support a level of growth and development beyond that anticipated in the General Plan. Implementation of the Project would not induce unplanned growth within RVCWD, nor would the Project contribute to previously identified impacts association with planned growth. For the reasons discussed above RVCWD’s water supply will not be increased and will not become more dependable as a result of the proposed Project; therefore, the annexation cannot provide grounds for the RVCWD to apply to the court to lift the court-imposed moratorium on domestic connections, or to lift its self-imposed moratorium on agricultural connections. Even assuming that the ability to use the existing 328.85 acre feet available under the Agreement anywhere in the RVCWD boundaries could somehow accommodate planned growth within RVCWD, implementation of planned growth would result in only those secondary environmental effects that have been identified and addressed in the Environmental Impact Report completed on the general plan. The County’s General Plan EIR considered the impacts of growth within the RVCWD Community Planning Area.

It should also be noted that RVCWD is pursuing other options to obtain additional water supplies to accommodate planned growth. RVCWD transfer of water services to the Ukiah Valley Water Authority (UVWA) was completed on January 2, 2025, with the City of Ukiah assuming oversight. The formation of this joint powers authority is intended to unify formerly independent water agencies, including RVCWD, creating coordination to optimize water resources. Even with the Project RVCWD is pursuing alternate supply sources to support planned growth. Thus, while water supply is a necessary ingredient for future growth in the project area, implementation of planned urban growth within RVCWD’s Sphere of Influence cannot hinge on implementation of the Project. Further, provision of water supply is not the only obstacle that must be removed in order for additional planned growth to occur within RVCWD Sphere of Influence, provision of other utilities and infrastructure are needed as well as addressing the current court-ordered moratorium for domestic water connections and a self-imposed moratorium for irrigation connections.

Therefore, the Project would have no impact on population or housing and would not be growth-inducing.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XIV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?	☐	☐	☐	X
Police protection?	☐	☐	☐	X
Schools?	☐	☐	☐	X
Parks?	☐	☐	☐	X
Other public facilities?	☐	☐	☐	X

Discussion

The Project involves annexation of RVCWD into the RRFC. RVCWD is currently under a court-ordered moratorium for domestic water connections and a self-imposed moratorium for irrigation connections due to water supply instability resulting in no need for additional public services which would not be altered by the proposed Project. No construction or land alterations are planned or involved, and no change in land use is contemplated by the Project; therefore, the Project would have no impact on public services.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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XV. RECREATION --

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that

☐	☐	☐	X
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Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	X

Discussion

a-b) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are planned or involved, and no change in land use is contemplated by the Project. The Project provides no recreational opportunities, and the Project will have no effect on recreational opportunities. Therefore, the Project would have no impact on recreation.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<u>XVI. TRANSPORTATION/TRAFFIC --</u> <i>Would the project:</i>				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation systems, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	☐	☐	☐	X
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
designated roads or highway?	☐	☐	☐	X
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	X
e) Result in inadequate emergency access?	☐	☐	☐	X
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☐	X

Discussion

a-f) The Project involves annexation of RVCWD into the RRFC. No construction or land alterations are planned or involved, and no change in land use is contemplated by the Project; therefore, the Project would have no impact on transportation or traffic.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
<u>XVII. UTILITIES AND SERVICE SYSTEMS</u> -- <i>Would the project:</i>				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	X
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could	☐	☐	☐	X

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
cause significant environmental effects?				X
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	X
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new/expanded entitlements needed?	☐	☐	☐	X
e) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	X
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☐	X
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	X

Discussion

a-g) The Project involves annexation of RVCWD into the RRFC. No change is contemplated to the RRFC's diversion facilities, either in quantity or time of diversion. No additional surface water supplies will be obtained as a result of this Project nor will it require construction of any new infrastructure or facilities. No construction or land alterations are proposed for this Project and no change in land use is contemplated by the Project that would negatively affect utilities or service systems in any way. RVCWD is currently under a court-ordered moratorium for domestic water connections and a self-imposed moratorium for irrigation connections due to water supply instability resulting in no need for additional utilities or service systems. The proposed Project does not result in a more reliable water supply to RVCWD; therefore, the Project would have no impact on utilities or service systems.

Issues	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE --				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☐	X
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☐	X
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	X

Discussion

The Project involves annexation of RVCWD County Water RRFC into the RRFC. The Project will not change the current land use of any land to be annexed, and no changes in RRFC operations are contemplated. No construction or land alterations are involved. Therefore, there are no mandatory findings of significance.

4. CONSULTATION WITH RESPONSIBLE AGENCY

The Mendocino County Local Agency Formation Commission is a responsible agency under Public Resources Code § 21080.3 and Title 14 California Code of Regulations § 15381. CEQA requires that as soon as the lead agency has decided that an initial study is required, it must consult with all responsible agencies to obtain their recommendations on whether an EIR or a Negative Declaration should be prepared. Public Resources Code § 21080.3; Title 14 Cal. Code Regs. § 15063(g). The RRFC has been communicating with Mendocino County LAFCO regarding the annexation and the CEQA process.

5. DETERMINATION

Comments were received on the Initial Study after the close of the comment period; nevertheless, they were considered by the lead agency. Response to comments have been prepared, and this Initial Study has been revised. Response to comments are included in this Initial Study as **Appendix 2**. Based upon the information contained in the Initial Study, it is determined that the Negative Declaration should be adopted.

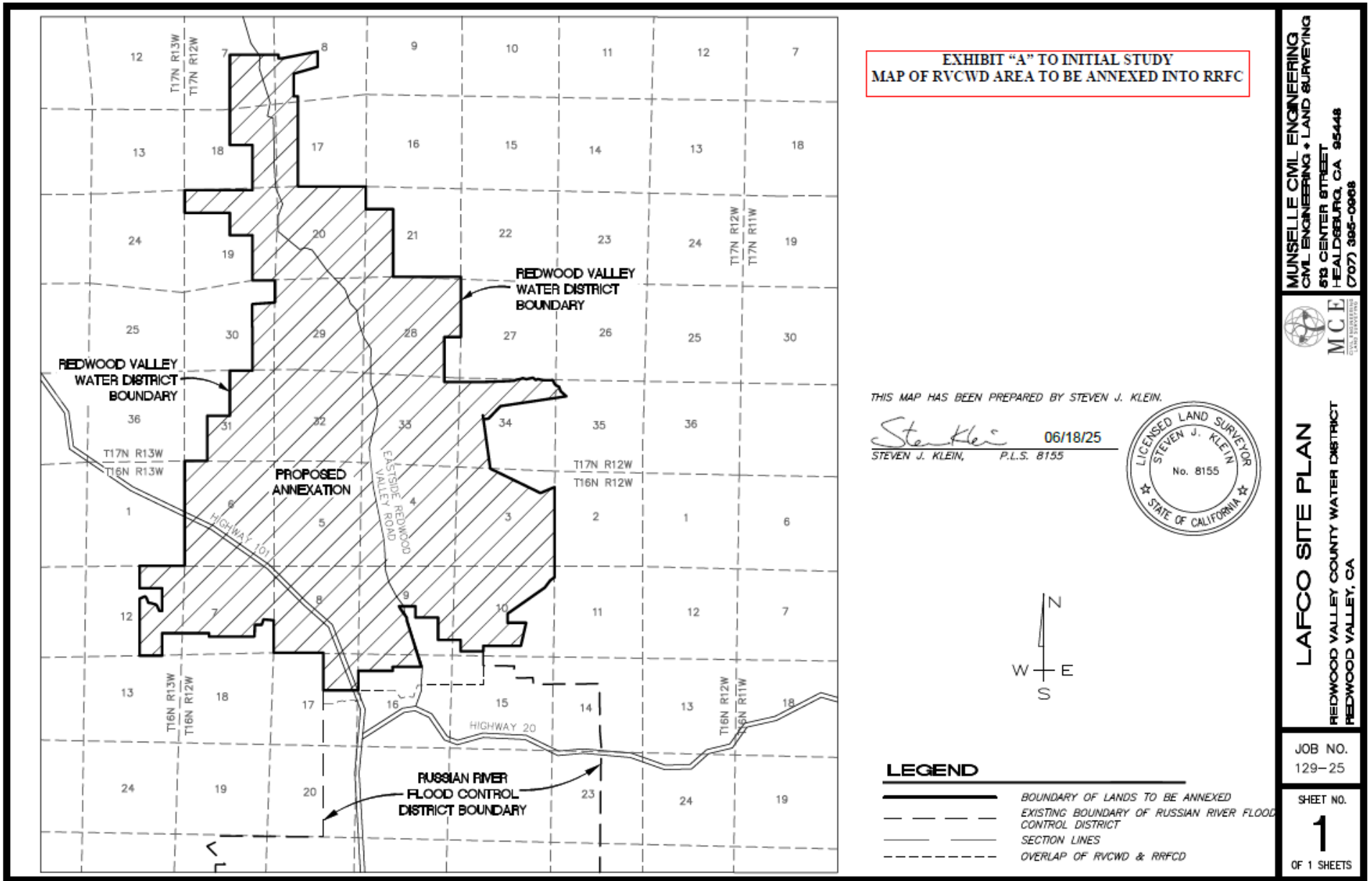
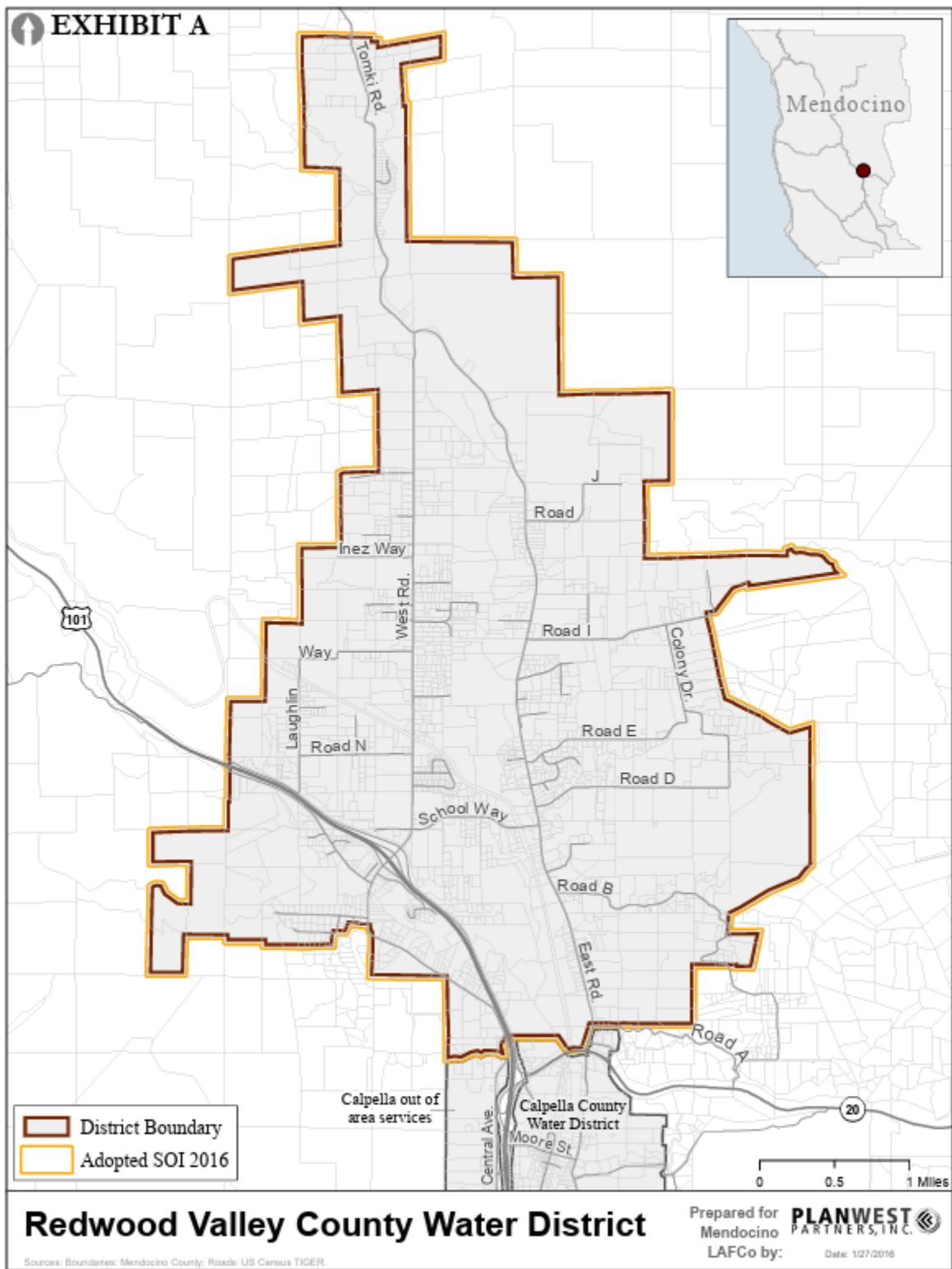
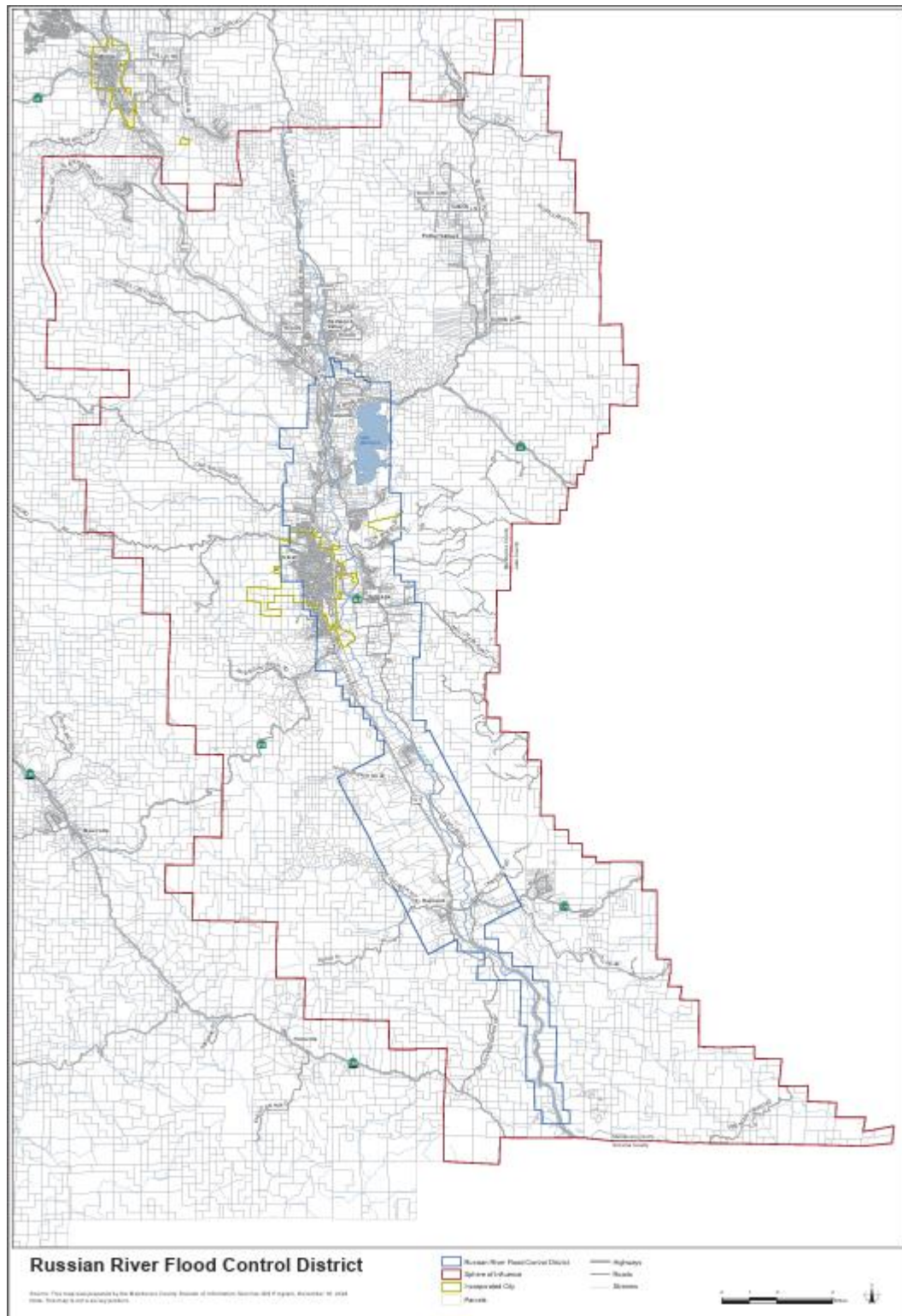


EXHIBIT B TO INITIAL STUDY MAP OF REDWOOD VALLEY COUNTY WATER DISTRICT



**EXHIBIT C TO INITIAL STUDY
MAP OF RRFC'S SPHERE OF INFLUENCE**



APPENDIX 1 TO INITIAL STUDY
RVCWD MORATORIUM

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4 Attorney for Petitioners

FILED

JAN 25 1989

MARSHA A. YOUNG
MENDOCINO COUNTY CLERK
Deputy

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF MENDOCINO

9 RESIDENTS FOR ADEQUATE WATER,
10 OLIVER L. SAUSE, and MICHAEL
E. SWEENEY,

CASE NO. 55595

11 Petitioners,

PEREMPTORY WRIT
OF MANDATE

12 vs.

13 STATE OF CALIFORNIA DEPARTMENT
14 OF HEALTH SERVICES and REDWOOD
VALLEY COUNTY WATER DISTRICT,

15 Respondents.

16
17 TO: REDWOOD VALLEY COUNTY WATER DISTRICT and STATE OF
18 CALIFORNIA DEPARTMENT OF HEALTH SERVICES, RESPONDENTS:

19 WHEREAS Petitioners served and filed herein their duly
20 verified Petition for Writ of Mandate, and a hearing was held on
21 May 6, 1988, May 9, 1988, June 13, 1988, June 14, 1988 and June
22 16, 1988;

23 WHEREAS it appears to this Court that Petitioners have no
24 other plain, speedy and adequate remedy in the ordinary course
25 of law;

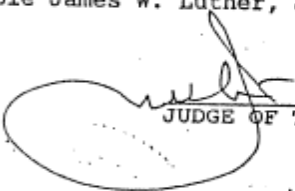
26 WHEREAS it appears to this Court that Respondent REDWOOD
27 VALLEY COUNTY WATER DISTRICT has failed to perform its legal
28 duty by continuing to make new domestic service connections

1 despite the fact that it is not in compliance with the
2 California Water Works Standards Requirement for source
3 capacity;

4 WHEREAS it appears to this Court that Respondent STATE OF
5 CALIFORNIA DEPARTMENT OF HEALTH SERVICES has failed to perform
6 its legal duty by failing to prohibit Respondent REDWOOD VALLEY
7 COUNTY WATER DISTRICT from making new domestic service
8 connections to said Water District despite the failure of said
9 Water District to be in compliance with the California Water
10 Works Standards Requirement for source capacity;

11 THEREFORE, you, REDWOOD VALLEY COUNTY WATER DISTRICT, are
12 hereby commanded immediately after receipt of this writ to cease
13 making any net increase in physical domestic service connections
14 to said REDWOOD VALLEY COUNTY WATER DISTRICT, and you, STATE OF
15 CALIFORNIA DEPARTMENT OF HEALTH SERVICES, are hereby commanded
16 immediately after receipt of this writ to prohibit REDWOOD
17 VALLEY COUNTY WATER DISTRICT from making any net increase in
18 physical domestic service connections to said REDWOOD VALLEY
19 COUNTY WATER DISTRICT.

20 WITNESS the Honorable James W. Luther, Judge of the
21 Superior Court.

22
23 
JUDGE OF THE SUPERIOR COURT

24
25 Attest my hand and the seal of the Court this 24th day
26 of January, 1989.

27 CLERK OF THE COURT

28 BY : Sherry Mobley
Deputy

**APPENDIX 2 TO INITIAL STUDY
RESPONSE TO COMMENTS**

RESPONSE TO COMMENTS

1.1 INTRODUCTION

This document contains comments received on the Initial Study and Proposed Negative Declaration (**IS/ND**) prepared by the Mendocino County Russian River Flood Control and Water Conservation Improvement District (**RRFC**), the lead agency for the Redwood Valley Annexation Project (**Project**) and responses to those comments. While responding to comments on an Initial Study/ Negative Declaration is not specifically required by the California Environmental Quality Act (**CEQA**), CEQA Guideline Section 15074(b) requires that a lead agency consider any comments received on the IS/ND prior to approving the project. As such, this document provides evidence that RRFC considered all comments received on the IS/ND for the Project.

In accordance with CEQA Guideline Section 15073, the IS/ND for the Project was circulated for a 30-day public review and comment period from June 29, 2025, through July 29, 2025. Three comment letters were received on the IS/ND as presented in Section 1.3, the first prior to the comment period deadline, the second after the comment period deadline, and the final after the comment period deadline titled an “amendment” to the first letter. The concerns raised in the comment letters revealed that the Project Description included in the IS/ND was not clear, consequently, revisions to the IS/ND were made. In light of the whole record, including the documents included and referenced in this response to comments, RRFC finds that there is no substantial evidence that the Project will have a significant effect on the environment as supported by the IS/ND.

In response to comments, RRFC has also amended the IS/ND to more thoroughly explain the proposed Project and its potential impacts. Consistent with CEQA law, because the changes to the IS/ND are minor and technical, they have been done by red lining the original IS/ND. Such an addendum does not require public review or recirculation. It is simply added to the project record. Consistent with Cal. Code Regs. Tit. 14 §15073.5(b) a new or supplemental review is required only if the IS/ND is “substantially revised after public notice,” which is defined as:

- (1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance, or
- (2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significance and new measures or revisions must be required.

§15073.5(c) also clarifies that recirculation of the IS/ND is not required under the following circumstances:

- (1) Mitigation measures are replaced with equal or more effective measures pursuant to Section [15074.1](#).

(2) New project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects.

(3) Measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA, which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect.

(4) New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

The revisions to the IS/ND fall under the circumstances described in Section [15073.5\(c\)\(2\)](#) and (4), and do not require recirculation.

1.2. CEQA REQUIREMENTS

CEQA Guideline Section 15074 identifies the responsibilities of a lead agency when considering the adoption of a proposed Negative Declaration, specifically:

- (a) Any advisory body of a public agency making a recommendation to the decisionmaking body shall consider the proposed negative declaration or mitigated negative declaration before making its recommendation.
- (b) Prior to approving a project, the decisionmaking body of the lead agency shall consider the proposed negative declaration or mitigated negative declaration together with any comments received during the public review process. The decisionmaking body shall adopt the proposed negative declaration or mitigated negative declaration only if it finds on the basis of the whole record before it (including the initial study and any comments received), that there is no substantial evidence that the project will have a significant effect on the environment and that the negative declaration or mitigated negative declaration reflects the lead agency's independent judgment and analysis.

Consistent with the CEQA Guidelines, RRFC has carefully reviewed and considered all comments received on the IS/ND for the Project and has amended the Initial Study. CEQA does not require a lead agency to prepare a response to public comments received on a proposed negative declaration or mitigated negative declaration. Nevertheless, RRFC has prepared this document to fully disclose public and agency comments received on the IS/ND for the Project and to provide responses to those comments.

1.3 COMMENTS RECEIVED ON THE PROPOSED NEGATIVE DECLARATION

The following comment letters were received during the comment period and are addressed in this section.

Letter Number	Commenter	Affiliation
1	Lee Howard, et al.	Unspecified
2	Uma Hinman, Executive Officer	Mendocino LAFCo
3	Lee Howard, et al.	Unspecified

The letters are attached. Responses to those comments follow. To assist in referencing comments and responses, each commenter and issue that has been raised has been assigned a number. Responses are coded to correspond to each issue. Comments that present opinions about the Project or that raise issues not related to environmental issues under CEQA are noted without response.

1.4 RESPONSES TO COMMENT LETTER 1

Comment 1.1:

1. The negative declaration is legally defective and fails to evaluate and mitigate the significant adverse impacts of the proposed annexation upon agricultural water users, agricultural production, and the potential loss of agricultural lands (due to potential water reductions in shortage periods) within the Russian River WCID. This is particularly troubling given the history of the failure of the County to adequately address these issues. SEE: *Masonite Corporation v. County of Mendocino* (July 25, 2013) 215 Cal.App.4th 230. This case ordered the County to have to “re-do” an EIR because it failed to address the adverse impacts of a project on agricultural lands and production in the Ukiah Valley.

Response to Comment 1.1:

Comment noted. The negative declaration evaluated potential impacts on agriculture and concluded there would be no significant adverse impacts to agricultural lands within the Project area, stating: The Project involves annexation of Redwood Valley County Water District (RVCWD) into the RRFC which would allow it to (1) utilize its current contracted supply anywhere within its boundaries, and (2) have access to surplus water on par with other RRFC customers. As discussed in the IS/ND, because the terms and conditions of RVCWD’s Agreement would remain in place, the proposed annexation of RVCWD could have no adverse impact on RRFC’s existing customers, agricultural or municipal, as shortage provisions are built into the Uniform Agreements and apply uniformly to all RRFC customers. The only way that RVCWD could increase its Agreement is if in the future existing RRFC customers reduce the quantity of water they have under contract or terminate their contract; under those circumstances, RVCWD would be eligible for a pro-rata share of that additional amount along with all other RRFC customers, the same as it would be today without annexation. Therefore, no change in land use will occur. The Project is likely to allow any existing agricultural acreage to continue in agricultural use. The Project would allow RVCWD to utilize its existing Agreement supply within its entire service area. RVCWD includes 9,610 acres in its service area, the available 328.85 acre feet is insignificant as it would provide less than 0.004 acre feet of water per acre. Conversely, the proposed project would have no adverse impact on agricultural use within either

RVCWD or RRFC. Farming practices on the annexed parcels are not anticipated to change following annexation. Therefore, the Project would have no impact on agriculture or forestry resources within RVCWD.

Similarly, the Project should have no impact on agricultural uses within RRFC. The concern that annexing RVCWD could harm RRFC's existing agricultural customers is a critical consideration. The District understands the concern that Water Code Section 106, which establishes a "priority of right" for domestic use over agricultural use, could subordinate agricultural water supply to domestic needs. However, this is not a new issue created by the Project. The potential for population growth and increased domestic water use exists whether or not RVCWD is annexed into RRFC as RVCWD currently includes numerous municipal suppliers as customers. The conclusion of no significant impact to RRFC agricultural users is based upon the facts in the record that annexation (1) will not increase the amount of water available to RVCWD, (2) will not provide RVCWD with a more reliable water supply that would allow it to lift either of the currently imposed moratoria, (3) will not result in any reduction in supply to RRFC current customers, and (4) will not result in shortages being imposed upon RRFC's agricultural customers for the benefit of domestic users.

Comment 1.2:

2. Contrary to the defective notice of the negative declaration, no portion of Redwood Valley has ever been annexed into the MCRRFCWCID. This deceptive and clearly erroneous representation in the notice invalidates the notice for CEQA purposes inasmuch as it mis-characterizes the "project" to be considered by your board.

Response to Comment 1.2:

This comment correctly notes that no *annexation* of any portion of RVCWD into RRFC has previously occurred. The statement in the IS/ND that "a portion of RVCWD's service area has already been annexed into RRFC" was a scrivener's error. More accurately, a small portion of the southernmost lands of RVCWD has been within RRFC's boundaries since RRFC's formation; this portion was never annexed but has historically been included in RRFC's service area. The Project seeks to formally annex that portion of RVCWD's service area not already within RRFC's boundaries. This clarification does not affect the adequacy of the environmental review in the IS/ND, as the mistake regarding prior annexation does not change the scope of the Project or alter the conclusions of the IS/ND. The IS/ND evaluated the potential for significant environmental impacts associated with annexing the *entirety* of RVCWD's service area into RRFC, regardless of whether any portion was previously within RRFC's boundaries. The environmental effects (or lack thereof) would be the same whether or not a portion of RVCWD had previously been annexed into RRFC. Therefore, the misstatement has no bearing on the adequacy or validity of the environmental conclusions in the IS/ND.

Comment 1.3:

3. MCRRFCWCID requested the authority to distribute “surplus water” to Redwood Valley and the State Water Resources Control Board only granted MCRRFCWCID the authority to distribute “surplus water” per the SWRCB authorization. The negative declaration fails to identify which current MCRRFCWCID agricultural contract will be reduced in order to “permanently serve” residential uses within the proposed Redwood Valley annexation area.

Response to comment 1.3:

The first sentence is noted. The second sentence states that the IS/ND does not identify “which current MCRRFC & WCID agricultural contract[s]” would be reduced in order to “permanently serve” residential uses within RVCWD once annexed. The IS/ND does not make such an identification because the Project would not result in any agricultural contracts being reduced in order to serve residential uses within RVCWD. Such a statement mischaracterizes the Project and the way in which RRFC allocates water.

There appears to be a fundamental misunderstanding of both the impact of the Project on agricultural water supplies and the methodology for allocating shortages within RRFC. RRFC’s licensed water right is allocated to customers through Uniform Water Supply & Purchase Agreements (**Uniform Agreement**). All water available to RRFC under its licensed water right is currently allocated under 60 Uniform Agreements, and no additional RRFC supplies are currently available for contract. The authorized place of use for RRFC’s licensed water right is anywhere within the RRFC service area, i.e., RRFC’s boundaries as set by Mendocino LAFCo, which currently includes a portion of RVCWD as mentioned above.

One of RRFC’s Uniform Agreements is with RVCWD for 328.85 acre feet annually for use in that small portion of RVCWD already within RRFC. If all of RVCWD is annexed into RRFC, the one immediate change would be that RVCWD can put its Uniform Agreement to beneficial use anywhere within its boundaries as RVCWD is already within RRFC’s licensed place of use. As mentioned, there is currently no more water available to contract from RRFC – so the amount of water available under RVCWD’s Uniform Agreement cannot currently be expanded, and will remain at 328.85 even after annexation. It is *possible* in the future that if customers under existing Uniform Agreements decide to reduce the amount under their contracts, additional water *could be available* for other customers to add to the amount of their Uniform Agreements. Such an occurrence is speculative at this point in time. It is important to note, however, that the situation described above is part of the base case for CEQA purposes: because RVCWD currently has a Uniform Agreement, it could take advantage of such a future scenario and increase the quantity under its existing Uniform Agreement without annexation. It would be speculative to determine what whether or not any or what quantities of water could become available in the future, and what would be done with any increase in water under RVCWD’s Uniform Agreement if certain circumstances could occur some time in the future, and CEQA does not require such speculation.

If RVCWD is annexed into RRFC, the only other immediate change would be that RVCWD can use available RRFC “surplus” water anywhere within its boundaries as it would now be within RRFC’s boundaries and is already within RRFC’s licensed place of use. RRFC’s “surplus”

water, as set forth in the Uniform Agreement, is water temporarily available under RRFC's licensed water right in excess of the amount necessary for RRFC to meet the demands of the Uniform Agreements. Because all RRFC water is currently contracted for under Uniform Agreements, this means that customer(s) would have to inform RRFC that they would not need all their contracted water in the upcoming season. This process is set forth in Section 3.2 of the Uniform Agreements. Currently, RVCWD is able to participate in this surplus water process on an equal basis with other existing customers for that. As set forth in the Uniform Agreement, if existing RRFC customers turn back some of their contract entitlement, that water is made available to all Uniform Agreement customers on a pro-rata basis. Without annexation, RVCWD can put such surplus water to use only in that portion of RVCWD already within RRFC. With annexation, RVCWD could put surplus water available under its Uniform Agreement to beneficial use anywhere within its boundaries.

Because the terms and conditions of RVCWD's Uniform Agreement would remain in place, the proposed annexation of RVCWD could have no adverse impact on RRFC's existing customers, agricultural or municipal, as shortage provisions are built into the Uniform Agreements and apply uniformly to all RRFC customers. The only way that RVCWD could increase its Uniform Agreement is if in the future existing RRFC customers reduce the quantity of water they have under contract or terminate their contract; under those circumstances, RVCWD would be eligible for a pro-rata share of that additional amount along with all other RRFC customers, the same as it would be today without annexation.

As the IS/ND explains, RRFC currently sells surplus water to RVCWD in accordance with the Stipulated Judgment No. 42059 of May 219, 1980 [See **Attachment 1**]. As set forth in the Stipulated Judgement, surplus water is that portion, if any, of RRFC's water supply, up to 8,000-acre feet, which is not put to beneficial use within the lands situated within RRFC. The amount of RRFC's license water available for contract has been reduced in recent years as more and more customers contracted for that water; as mentioned above, there is currently no additional water available under RRFC's licensed water right for contract.

RRFC currently treats all of its customers equally. Shortage provisions in the Uniform Agreement currently provide:

11.2 Allocation of Shortage. In the event that a shortage condition from any cause is declared by the District with respect to its water rights or supply in Lake Mendocino and the east fork of the Russian River, and evidence of such shortage condition is of sufficient magnitude, in the District's sole opinion or findings, to require a reduction in diversions by District pursuant to its Permit, then District shall be entitled to reduce the amount of District Water it is required to deliver to Customer pursuant to the terms of this Agreement in the manner set forth below without any form or manner of liability. Customers will share pro rata in the reduction in District's allowed diversions from the Russian River and/or Lake Mendocino, as the case may be.

11.3 Declaration and Notice. In the event of a shortage pursuant to Section 11.2 above, District shall deliver a written "Notice of Impending Shortage" to Customer, informing Customer of the amount of reduction in District Water for the period in question, which

shall be binding on Customer. Within thirty (30) days of delivery of such a Notice of Impending Shortage, District shall notice and conduct a public meeting to meet and confer with its customers in an effort to determine the terms and provisions under which District will deliver District Water to Customers for the period during which the shortage condition prevails.

11.4 Water Shortage Emergencies. Notwithstanding Section 11.2 above, the District may allocate District Water to its Customers as set forth in Article 9 of Ordinance #25-01 if a water shortage emergency has been declared pursuant to Water Code section 350. In the event of such an emergency water shortage, District shall comply with the notice, hearing, and other requirements set forth in Division 1 Chapter 3 of the California Water Code.

Article 9 of Ordinance #25-01 provides in pertinent part: “During any period of threatened or actual water shortage, the District has the right to apportion its available District Water supply among Customers in a manner that appears most equitable with due regard to public health and safety”. Historically, RRFC has imposed shortages on its customers on a pro-rata basis; it has never treated agricultural and municipal customers differently. RRFC has no plans to deviate from its past practice in allocating shortages on a pro-rata basis to all customers regardless of water use.

As mentioned above, the District understands the concern that Water Code Section 106, which establishes a "priority of right" for domestic use over agricultural use, could subordinate agricultural water supply to domestic needs. California Water Code Section 106 has been in effect since its enactment in 1943. However, because it is a broad policy statement rather than a specific operational rule, it has not been imposed by any court as a requirement on water allocations in California. This issue of domestic priority, however, is not a new issue created by the Project. The potential for population growth and increased domestic water use exists whether or not RVCWD is annexed into RRFC as RVCWD currently includes numerous municipal suppliers as customers. The conclusion of no significant impact to RRFC agricultural users is based upon the facts in the record that annexation (1) will not increase the amount of water available to RVCWD, (2) will not provide RVCWD with a more reliable water supply that would allow it to lift either of the currently imposed moratoria, (3) will not result in any reduction in supply to RRFC current customers, and (4) will not result in shortages being imposed upon RRFC’s agricultural customers for the benefit of domestic users.

It should be noted that RRFC already has existing Uniform Agreements with numerous municipal water suppliers, including Millview County Water District, Redwood Valley County Water District, Calpella County Water District, Russian River Estates, Rogina Mutual Water, Hopland Public Utility District, and Willow County Water District. Therefore, potential issues posed by domestic use priority over agricultural use pre-date this Project. As mentioned above, RRFC has no plans to deviate from its past practice in allocating shortages on a pro-rata basis to all customers regardless of water use. RRFC acknowledges that in water short years it is possible that domestic users will be entitled to health and safety water even when other use types have been curtailed. In prior droughts, emergency regulations adopted by the State Water Resources Control Board have allowed diversions necessary for minimum human health and safety needs

under any valid basis of right of not greater than 55 gallons per person per day to continue notwithstanding curtailment. This exception to curtailment applied to the entire RVCWD district, not simply that portion of the district within RRFC, and therefore would not be changed or expanded by annexation. Because this curtailment exception was granted to the entire RVCWD district before the proposed Project, it is part of the CEQA base case; in addition, the action was taken by the Division and was not taken by RRFC. Annexing RVCWD would not change RRFC's method of allocation water under the Uniform Agreement, or its method of imposing shortages.

Lastly, as explained in the IS/ND, RVCWD is pursuing other options to obtain a more reliable domestic water supply. RVCWD's transfer of water services to the Ukiah Valley Water Authority (UVWA) was completed on January 2, 2025, with the City of Ukiah assuming oversight. The formation of this joint powers authority is intended to unify formerly independent water agencies, including RVCWD, creating coordination to optimize water resources. The UVWA offers coordinated use of each member's respective water supplies and systems to maximize availability. As now explained in the IS/ND, annexation into the RRFC would not result in any reliable domestic water supply for RVCWD, it would simply allow for full use of RVCWD's existing Uniform Agreement, and any surplus water available thereunder, anywhere within its boundaries.

Comment 1.4:

4. MCRRFCWCID does not hold any reliable surplus water supplies that are available for permanent allocation to permanent residential uses within Redwood Valley. The defective negative declaration has failed to identify both a redundant source of water or the massive growth inducing impacts (and the adverse impacts and mitigation requirements) that will result from the transfer of agricultural water from within the current boundaries of the MCRRFC to future developments within Redwood Valley that will be facilitated by the conversion of ag water to permanent residential consumptive uses.

Response to Comment 1.4:

As described above, it is true that RRFC does not currently hold any reliable surplus water supplies that are available for permanent allocation to permanent residential uses within RVCWD. For this reason, the Project does not propose allocating any new supplies to RVCWD.

The IS/ND did not analyze the “growth inducing impacts that will result from the transfer of agricultural water from within the current boundaries of the RRFC to future developments within RVCWD that will be facilitated by the conversion of ag water to permanent residential consumptive uses”, because that is not a part of the proposed Project and cannot occur as a result of the proposed Project.

The IS/ND did evaluate the potential growth inducing impacts of the actual scope of the Project. Section XIII of the IS/ND directly addresses population growth, noting that RVCWD is currently under a **court-ordered** moratorium for domestic connections and a self-imposed irrigation moratorium.

The court imposed domestic moratorium was upheld by the court in *Residents for Adequate Water v. Redwood Valley County Water Dist.* (1995) 34 Cal.App.4th 1801. The court stated:

Safe Drinking Water Act provides that the operator of a public water system is charged with a mandatory duty to provide a reliable and adequate supply of pure, wholesome and potable water. (§ 4017, subd. (c).) No operator of a public water system shall modify its authorized distribution system unless the operator first submits an application to the Department of Health Services and receives an amended permit as provided in the Safe Drinking Water Act authorizing the modification. (§ 4016, subd. (a).) The California Waterworks Standards-the administrative regulations promulgated pursuant to the Safe Drinking Water Act-specifically provide that sufficient water shall be available from water sources and distribution reservoirs to supply adequately, dependably and safely the total requirements of all users under maximum demand conditions before agreement is made to permit additional service connections to a system. (Cal. Code Regs., tit. 22, § 64562, subd. (a); see Cal. Code Regs., tit. 22, ch. 16.) A new service connection may be added to a distribution system only if the water system will comply with section 64562 after the new service connection is added. (Cal. Code Regs., tit. 22, § 64568.) These statutes and regulations clearly impose an obligation on the district to determine whether an adequate water supply exists to serve existing needs before new service connections may be added and prohibit new service connections if these state requirements are not met.

As discussed in the IS/ND, the proposed Project will not provide a new adequate, dependable supply of water for the entire RVCWD, and is not a grounds to support compliance with Section 64562. RVCWD currently provides domestic and agricultural water services to the community of Redwood Valley, including a total of 1105 equivalent dwelling units and 197 agricultural customers. In 2016, RVCWD delivered approximately 750 AFY for residential and commercial uses, and 1,450 AFY for agricultural purposes-a combined annual demand of 2,200 AFY¹. As identified in the IS/ND, RVCWD maintains a 68-acre-foot storage tank of untreated water from which water is transmitted to the water treatment plant to produce domestic water. The plant has a capacity of 1.7 million gallons per day. RVCWD's supply consists of a right to divert up to 4,900 AF from Lake Mendocino if flow at the confluence of the forks of the Russian River exceeds 72,000 AF. It is estimated that water will be available for 70 days in wet years and one or two days in dry years. Spreading the currently available 328.85 from RRFC over the entire 9,610 acres in RVCWD would not provide sufficient supplies to lift the moratoria, nor would the availability of surplus water in wet years provide sufficient reliable supply for RVCWD.

Further, RRFC does not have jurisdiction over the ability of RVCWD to issue Will Serve letters to domestic customers, which is entirely under the purview of the Division. There are no guarantees, implied or explicit, of additional water supplies being furnished to RVCWD as a result of the Project. Therefore, because the proposed Project does not increase the water available to RVCWD, the availability of water through annexation is insufficient to support removal of the moratorium or support population growth.

¹ Redwood Valley County Water District Sphere of Influence Update, Mendocino Local Agency Formation Commission, February 1, 2016.

As mentioned, the concern that annexing RVCWD could harm RRFC's existing agricultural customers is a critical consideration. The District understands the concern that Water Code Section 106, which establishes a "priority of right" for domestic use over agricultural use, could subordinate agricultural water supply to domestic needs. However, this is not a new issue created by the Project. The potential for population growth and increased domestic water use exists whether or not RVCWD is annexed into RRFC because RVCWD could get water from other sources. Furthermore, the proposed Project will only (1) allow the current contract amount of 328.85 acre feet to be spread to the entire district, and (2) allow RVCWD to obtain surplus water supplies when available on an equal playing field with other RRFC customers. Surplus water cannot be relied upon to lift the previously discussed domestic service moratorium. Allowing the 328.85 acre feet to be used within RVCWD's entire service area would not provide sufficient water

1.5 RESPONSE TO COMMENT LETTER 2

Comment 2.1:

LAFCo is required to consider service concerns to existing customers of the agency in its analysis of applications for change of organization. Government Code Section 56857(d)(2) defines "service concerns" as when a district will not have the ability to provide the services that are the subject of the application to the territory proposed to be annexed without imposing level of service reductions on existing and planned future uses in the district's current service area.

Response to Comment 2.1:

The RRFC does not intend to impose any service reductions on existing customers in its current service area in order to provide services to RVCWD. Please see the response to Comment 1.3 above.

Comment 2.2:

To support the required LAFCo findings, additional information is needed regarding the assumptions contained in the ND. The ND and associated Annexation Plan for Service assumes that the quantities of water contracted to existing RRFC customers will remain steady, and also assumes that while the quantity of water available to RVCWD under the RRFC license is 4,000 acre-feet (AF) per year, the average annual purchase has been 850 AF, and this is not expected to change. The ND does not discuss the factual bases for these assumptions, and these assumptions are the reason for a very abbreviated environmental analysis and discussion.

Response to Comment 2.2:

The comment is correct that the IS/ND assumes that the quantities of water contracted to existing RRFC customers under the Uniform Agreements will remain steady. The commenter also requests a factual basis for the statement in the Annexation Plan for Services that while the quantity of water available to RVCWD under the RRFC license is 4,000 acre-feet (AF) per year, the average annual purchase has been 850 AF, and this is not expected to change." As discussed in the IS/ND and above, the amount of water reliably available to RVCWD from RRFC under the Agreement is 328.85 acre feet annually. The average annual purchase of surplus water has been 850 acre feet. This is not expected to change because the amount of water available to RRFC under the License has been fully contracted for, and RRFC expects that the amount of

surplus water available annually will be lower each year, and illustrated by the fact that there was no surplus water available to RVCWD in recent drought years.

The original reference to 4,000 acre feet stems from language in State Water Resources Control Board Order 79-15 [See **Attachment 2**], in which the SWRCB granted RRFC's request to include RVCWD in its permitted place of use. Decision 79-15 states that RRFC:

“proposes to supply water to the Redwood Valley District by **contract**. Under the terms of the contract, the Redwood Valley District would be supplied **up to 4,000 afa** of permit water, to the extent such water is surplus to the needs of the Mendocino District. In other words, the Mendocino District proposes to divert the unused portion of its 8,000 afa depletion allowance to the Redwood Valley District, whose lands are drained by the West Fork Russian River, until such time as it is needed within the original Mendocino District place of use. Average use by the Mendocino District during a normal year has been about 4,000 afa, leaving a like quantity available for Redwood.” (Attachment 2, p. 4-5).

The current controlling document is the Stipulated Judgment RRFC and RVCWD agreed to in 1980 [See **Attachment 1**], which provides that RRFC will sell to RVCWD “so much of such surplus water as Redwood desires to purchase, up to and including the entire amount of such surplus water...” (Attachment 1, p. 2). The Stipulated Judgment defines “surplus water” as “that portion, if any, of said 8,000 acre feet which is not put to beneficial use within the land situated in the Mendocino District” (*Id.*). RRFC has complied with the Stipulated Judgment over the years; however, as demand has grown and more Uniform Agreements have been executed, the amount of RRFC's surplus water as defined in the Stipulated Judgment has been reduced. In the past nine years, RVCWD has received an average of 848-acre feet of surplus water annually. In addition, though RVCWD currently has access to “surplus” water as defined in the Uniform Agreement on an equal basis as all other RRFC customers, it can only put such surplus to use in that area of RVCWD already within RRFC's boundaries. RVCWD then has to wait until all customers within RRFC have determined whether or not they wish to purchase available surplus water under their Uniform Agreements before RVCWD is notified of surplus water available pursuant to the Stipulated Judgment for use in that portion of RVCWD outside of RRFC.

The current allocation of water to RRFC customers, including RVCWD, will not change as a result of the Project. RRFC contracts for use of its licensed water right in the Uniform Agreements, the terms of which will not be affected by the Project. As also mentioned, RVCWD already has a Uniform Agreement for 328.85-acre feet annually. The only change that would result from the Project is that RVCWD would be able to put any water available under its Uniform Agreement to beneficial use anywhere within RVCWD, in contrast to existing conditions limiting RVCWD's use to only that portion currently within RRFC. The water available to RVCWD following annexation will not be any more dependable than the 328.85-acre feet, and any surplus water, available under its existing Uniform Agreement.

Comment 2.3:

Because the ND includes these assumptions that demand and use will not change at all upon annexation, it does not include any discussion of how the annexation might impact service to existing customers in the RRFC service area. The ND also relies heavily on the assumption that the two moratoria in place at RVCWD will remain in place (discussed further below). Presently, the conclusions of no significant impact are based upon assumptions that are not supported by facts in the record.

Response to Comment 2.3:

It is true that because the IS/ND includes the assumption that demand and use of water under RRFC's licensed water right will not change as a result of the Project, the IS does not discuss how the Project might impact service to existing RRFC customers; this assumption is warranted. While the IS/ND does not rely heavily on it, it does assume that the two moratoria in place in RVCWD will remain in place; while the commenter is correct that the moratoria may not remain in place in the future, the important statement for purposes of the ND is that if the two moratoria are lifted in the future, it will not be as a result of the proposed Project.

In 1989, the Mendocino Superior Court issued a Peremptory Writ of Mandate to order the California Department of Health Services to prohibit any further connections for domestic use to the RVCWD system on the basis that the water supply was not dependable. This moratorium on domestic service connections remains in effect today and presumably will remain in effect until RVCWD has sufficient evidence of a reliable water supply to present to the California Department of Health Services and/or the court to warrant its removal. The ability and likelihood of RRFC's proposed annexation resulting in RVCWD securing enough water to petition the court to remove the moratorium, and what effects lifting of the moratorium might have on population and housing, is directly addressed in the IS. Practically, RVCWD has an existing Uniform Agreement with RRFC for 328.85-acre feet annually which will not be increased as a result of the Project as there is no additional water available under RRFC's licensed water right. It is possible in the future that if additional RRFC water becomes available the RVCWD Uniform Agreement quantity may be increased. The goal of the annexation is to allow RVCWD to use RRFC contracted water anywhere within the RVCWD service area, not to contract for more water. Therefore, the proposed annexation itself will not result in any increase of water supply to RVCWD sufficient to warrant removal of the court-imposed moratorium, as concluded in the IS/ND.

We disagree with the statement that "the conclusions of no significant impact are based upon assumption that are not supported by facts in the record." To the contrary, the conclusions of no significant impact are based upon the facts in the record that annexation (1) will not increase the amount of water available to RVCWD, (2) will not provide RVCWD with a more reliable water supply that would allow it to lift either of the currently imposed moratoria, (3) will not result in any reduction in supply to RRFC current customers, and (4) will not result in shortages being imposed upon RRFC's agricultural customers for the benefit of domestic users. As such, the conclusion of no significant impact is supported by facts in the record.

As a follow-up comment, LAFCO has asked:

Is there a possibility that RRFC contract supplies could be distributed by RVWCD to domestic users within the annexed area? If that is possible, it would be helpful to explain how a State mandated priority for domestic use in a dry year will not be impacted by the annexation. For example, additional domestic users within RVCWD would not be prioritized over irrigation users within RRFC.

It is certainly possible that RVCWD could use the 328.85 acre feet under its existing Uniform Agreement for domestic users within the annexed area; however, this would have no change from the base case for the following reasons:

First, under the Uniform Agreement RRFC imposes shortages on all customers on a pro-rata basis, without consideration for type of use, it has never treated agricultural and municipal customers differently. RRFC has no plans to deviate from its past practice in allocating shortages on a pro-rata basis to all customers regardless of water use.

Second, as discussed above in response to Comment 1.3, because Water Code Section 106 is a broad policy statement rather than a specific operational rule, it has not been imposed by any court as a requirement on water allocations in California. This issue of domestic priority, however, is not a new issue created by the Project. The potential for population growth and increased domestic water use exists whether or not RVCWD is annexed into RRFC as RVCWD currently includes numerous municipal suppliers as customers. RRFC acknowledges that in water short years it is possible that domestic users will be entitled to health and safety water even when other use types have been curtailed. Again, however, this is part of the base case, and not an impact caused by the proposed Project. In prior droughts, emergency regulations adopted by the State Water Resources Control Board have allowed diversions necessary for minimum human health and safety needs under any valid basis of right of not greater than 55 gallons per person per day to continue notwithstanding curtailment. This exception to curtailment applied to domestic uses within the entire RVCWD district, not simply that portion of the district within RRFC, and therefore would not be changed or expanded by annexation. Because this curtailment exception was granted to the entire RVCWD district before the proposed Project, it is part of the CEQA base case; in addition, the action was taken by the Division and was not taken by RRFC. Annexing RVCWD would not change RRFC's method of allocation water under the Uniform Agreement, or its method of imposing shortages.

Comment 2.4:

To the extent that impacts to service capacity for existing customers may occur, the ND should analyze the potential for impacts to agricultural lands that would result from future curtailments in dry years that might be exacerbated by serving the annexed area, or as a result of domestic service priority in times of water shortage.

Response to Comment 2.4:

No impacts to RRFC's existing customers will occur as a result of the Project. As discussed above in the response to Comment 1.3, RRFC has historically imposed shortages upon its

customers in accordance with the Uniform Agreement on a pro-rata basis; it has never treated agricultural and municipal customers differently and has never imposed a domestic service priority in times of water shortage. The proposed Project will not change the terms of the Uniform Agreements, or RRFC's method of imposing shortages. Further, the proposed Project will not change the State Water Resources Control Board's method of dealing with domestic exceptions to curtailment, as that predates the proposed Project. The recent actions of the State Water Resources Control Board illustrate the fact that it is not the proposed Project that could change water allocations in RRFC, but outside forces. As stated above, the State has already imposed a priority for domestic uses within RVCWD even without them being in RRFC, and this is not expected to change. Because this priority was granted before the proposed Project, it is part of the CEQA base case; in addition, the action was taken by the Division and was not taken by RRFC.

Comment 2.5:

In the past, RVCWD has relied upon its own limited supplies and "surplus" water from RRFC. Due to the insufficiency of these water supplies, the RVCWD has two moratoriums in place: the court-ordered moratorium on new domestic connections and a "self-imposed" moratorium on new irrigation connections.

The draft ND relies on the moratoriums to avoid analyzing the potential impacts from increased connections in the future. However, there is nothing to prevent either of these moratoria from being lifted.

A self-imposed limitation may be lifted at any time, and, if the annexation allows for increased water supplies and reliability, the RVCWD board may cancel the "self-imposed" moratorium to allow new irrigation connections.

The court ordered moratorium was issued in 1988, and it relied upon a set of waterworks standards that were comprehensively revised by the State in 2009. The basis for the court order was the fact that at the time (under the old law) the source capacity did not meet the California standards. If the supply is increased and becomes more reliable, application to the court could be made to lift the moratorium.

Response to Comment 2.5:

As briefly discussed above in the response to Comment 2.3, the IS/ND does not rely on the moratoria remaining in place to avoid analyzing potential impacts from increased connections in RVCWD in the future. It is true that there is nothing to prevent the self-imposed moratorium on new irrigation connections from being lifted at any time. However, the comment states:

. . . if the annexation allows for increased water supplies and reliability, the RVCWD board may cancel the "self-imposed" moratorium to allow new irrigation connections.

As discussed above, the annexation will not and cannot result in increased water supplies or reliability for RVCWD over the base case. For the same reason, because RVCWD's water supply will not be increased and will not become more dependable as a result of the proposed Project, there would be no grounds for the RVCWD to apply to the court to lift the court-imposed moratorium on domestic connections.

Comment 2.6:

The Annexation Plan for services states that the annexation "...will not meet the requirements to lift this moratorium [sic]." The "requirements" referenced in the Annexation Plan for Services that would need to be met to lift the respective moratoria should be identified in the analysis. The source capacity requirements of the State should be identified and information regarding why the annexation will not allow RVCWD to meet the source capacity requirements should be provided. With respect to the self-imposed moratorium, the factual basis for an assumption that it will not be lifted should be provided. Additional information supporting the conclusion that the moratoria will not be lifted or altered as a result of the annexation is needed in order for decision makers, including the LAFCo Commissioners, to determine that the annexation will not induce growth and result in a potential reduction in service capacity for existing customers and/or conversion of farmland.

While the ND asserts that the additional supplies would not allow for development beyond what was analyzed in the GP EIR, the analysis should consider the effect on RRFC's water supplies resulting from potential RVCWD buildout and potential impacts to existing RRFC customers should the moratoria be lifted as a result of the proposed annexation.

Response to Comment 2.6:

Imposing the responsibility on RRFC to analyze the requirements for RVCWD's court-ordered moratorium to be lifted is putting the cart before the horse. For either of the moratoria to be lifted there would need to be some additional or more reliable water supply to RVCWD; the proposed Project can provide neither. As mentioned above, the current allocation of water to RRFC customers, including RVCWD, under the Uniform Agreements will not change as a result of the Project. As also mentioned, RVCWD has a Uniform Agreement for 328.85-acre feet annually. The only change that would result from the Project is that RVCWD would be able to put any water available under its Uniform Agreement to beneficial use anywhere within RVCWD, in contrast to existing conditions limiting RVCWD's use to only that portion currently within RRFC. The water available to RVCWD following annexation will not be any more dependable than the 328.85-acre feet, and any surplus water, available under its existing Uniform Agreement.

As also mentioned above, the court-imposed moratorium will remain in effect until RVCWD has sufficient evidence of a reliable water supply to present to the California Department of Health Services and/or the court to warrant its removal – which is not provided by the proposed Project. The ability and likelihood of RRFC's proposed annexation resulting in RVCWD securing enough water to petition the court to remove the moratorium, and what effects lifting of the moratorium might have on population and housing, is directly addressed in the IS. Practically, RVCWD has an existing Uniform Agreement with RRFC for 328.85-acre feet annually which will not be increased as a result of the Project as all other RRFC water is contracted for. It is possible in the future that if additional RRFC water becomes available RVCWD's Uniform Agreement quantity may be increased. The goal of the annexation is to allow RVCWD to use RRFC contracted water anywhere within the RVCWD service area, not to contract for more water. Therefore, the proposed annexation itself will not result in any increase of water supply to RVCWD sufficient to warrant removal of the moratorium, as concluded in the IS/ND and discussing the criteria for removal of one or both of the moratoria will not change this fact.

1.6 RESPONSE TO COMMENT LETTER 3

Most of the comments in this letter duplicate the comments in Comment Letter 1.

Comment 3.1:

By this letter, we hereby object to the Notice you published as to limitation of time within which comments may be made to the Negative Declaration. Said notice provides in part that the “formal 30 day comment period ends July 29th at noon” and that said faulty notice is not cured by posting on the internet that “the District continues to welcome comments on the Negative Declaration and the proposed annexation” (<https://www.rvlc.net/proposed-application-for-annexation-of-redwood-valley-county-water-district-2025>.) The legal right expires at 5:00P.M. on June 30, 2025. The California Environmental Quality Act (CEQA) is strictly construed against the objector. So too should it be similarly be strictly construed against the Redwood Valley County Water District (RVCWD). As the old saying goes, “What is good for the goose is good for the gander.”

Response to Comment 3.1:

The notice period for the ND follows California law and the requirements of the California Environmental Quality Act.

Comment 3.2:

By this letter, without waiving our prior objection, I further object to the proposed negative declaration that has been promulgated by your agency for the purposes of “fast-tracking” the annexation of the Redwood Valley County Water District (RVCWD) into the Mendocino Russian River Flood Control and Water Conservation District. This is a major project as defined by CEQA and necessitated a full Environmental Impact Report before the district is allowed to proceed with the consideration of this proposal.

Response to Comment 3.2:

The IS/ND did not identify any adverse environmental impacts resulting from the proposed Project. Therefore, an Environmental Impact Report is not required.

Comment 3.3:

1. The negative declaration is legally defective and fails to evaluate and mitigate the significant adverse impacts of the proposed annexation upon agricultural water users, agricultural production, and the potential loss of agricultural lands (due to potential water reductions in shortage periods) within the Russian River WCID. This is particularly troubling given the history of the failure of the County to adequately address these issues. SEE: *Masonite Corporation v. County of Mendocino* (July 25, 2013) 215 Cal.App.4th 230. This case ordered the County to have to “re-do” an EIR because it failed to address the adverse impacts of a project on agricultural lands and production in the Ukiah Valley.

Response to comment 3.3:

See response to Comment 1.1.

Comment 3.4:

2. The negative declaration is legally defective and fails to evaluate and mitigate the significant adverse impacts of the proposed annexation upon:
 - a. Agricultural water users;
 - b. Agricultural production;
 - c. The potential loss of agricultural lands due to potential agricultural and residential water use by non-riparian water users;
 - d. The legal right to sell water from the Russian River or its aquifers to non-riparian persons;
 - e. The legal rights of riparian owners pursuant to the “*Treaty of Peace, Friendship, Limits, and Settlement With the Republic of Mexico*” (hereinafter, “*Treaty of Guadalupe Hidalgo*”) dated February 2, 1848.
 - f. The impact on the riparian owners from the headwaters of the Russian River to its mouth at the Pacific Ocean, whose property originates with Mexican Land grants, that occurred prior to the State of California becoming the 31st state on September 9, 1850, and were confirmed by the California Board of Land Commissioners.
 - g. The right of water appropriators to pre-empt the rights of riparian owners.

Response to comment 3.4:

The impacts listed in comments 2.a, b and c, see response to Comment 1.1. The remaining impacts listed as comments 2.c through g are not CEQA issues.

Comment 3.5:

3. Contrary to the defective notice of the negative declaration, no portion of Redwood Valley has ever been annexed into the MCRRFCWCID. This deceptive and clearly erroneous representation in the notice invalidates the notice for CEQA purposes inasmuch as it mis-characterizes the “project” to be considered by your board.

Response to Comment 3.5:

See response to Comment 1.2.

Comment 3.6:

4. MCRRFCWCID requested the authority to distribute “surplus water” to Redwood Valley and the State Water Resources Control Board only granted MCRRFCWCID the authority to distribute “surplus water” per the SWRCB authorization. The negative declaration fails to identify which current MCRRFCWCID agricultural contract will be reduced in order to “permanently serve” residential uses within the proposed Redwood Valley annexation area.

Response to Comment 3.6:

See response to Comment 1.3.

Comment 3.7:

5. MCRRFCWCID does not hold any reliable surplus water supplies that are available for permanent allocation to permanent residential uses within Redwood Valley. The defective negative declaration has failed to identify both a redundant source of water or the massive growth inducing impacts (and the adverse impacts and mitigation requirements) that will result from the transfer of agricultural water from within the current boundaries of the MCRRFC to future developments within Redwood Valley that will be facilitated by the conversion of ag water to permanent residential consumptive uses.

Response to Comment 3.7:

See response to Comment 1.4.

RECORDING REQUESTED BY
AND MAILED TO:

Mendocino County Russian River
Flood Control & Water Conservation
NAME: Improvement District

STREET: PO BOX 2104

CITY: Ukiah, CA 95482

att: Elizabeth Salomone,
General Manager

CONFORMED COPY

Copy of Document Recorded on
10/10/2025 02:39:55 PM
as 2025-E0089
Mendocino County Clerk-Recorder

Notice of Determination

(TITLE OF DOCUMENT)

This page added to provide adequate space for recording information.
(Additional recording fee applies)

POSTED FROM 10/10/25 TO 11/11/25
Packet Pg 119 of 171

Notice of Determination

Appendix D

To:

☒ Office of Planning and Research

U.S. Mail: Street Address:
P.O. Box 3044 1400 Tenth St., Rm 113
Sacramento, CA 95812-3044 Sacramento, CA 95814

☒ County Clerk

County of: Mendocino
Address: 501 Low Gap Road - Room 1020
Ukiah, CA 95482

From:

Mendocino County Russian River Flood Control
Public Agency: and Water Conservation Improvement District

Address: PO Box 2104
Ukiah, CA 95482

Contact: Elizabeth Salomone

Phone: 707-462-5278

Lead Agency (if different from above):

Address: _____

Contact: _____

Phone: _____

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse): _____

Project Title: MENDOCINO COUNTY RUSSIAN RIVER FLOOD CONTROL AND WATER CONSERVATION
IMPROVEMENT DISTRICT REDWOOD VALLEY ANNEXATION

Project Applicant: Mendocino County Russian River Flood Control and Water Conservation Improvement District

Project Location (include county): Mendocino County - Within the boundaries of Redwood Valley
County Water District

Project Description:

Filing of an application with the Mendocino County Local Agency Formation Commission to annex the Redwood Valley County Water District into the boundaries of the RRFC. The Project Description is more fully set forth in the Initial Study for the Project. The purpose of the annexation is to allow RVCWD to contract with the RRFC to receive surface water supplies available under the RRFC's licensed water right.

This is to advise that the Mendocino County Russian River Flood Control
and Water Conservation Improvement District has approved the above
☒ Lead Agency or ☐ Responsible Agency

described project on 10/06/2025 and has made the following determinations regarding the above
(date)
described project.

1. The project ☐ will ☒ will not have a significant effect on the environment.
2. ☐ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
☒ A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures ☐ were ☒ were not made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan ☐ was ☒ was not adopted for this project.
5. A statement of Overriding Considerations ☐ was ☒ was not adopted for this project.
6. Findings ☒ were ☐ were not made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:

304 North State Street, Ukiah, California, 95482.

Signature (Public Agency): Elizabeth Salomone Title: General Manager

Date: October 6, 2025

Date Received for filing at OPR: October 6, 2025

**MENDOCINO COUNTY RUSSIAN RIVER FLOOD CONTROL
AND WATER CONSERVATION IMPROVEMENT DISTRICT
NEGATIVE DECLARATION REGARDING ENVIRONMENTAL IMPACT**

1. NOTICE IS HEREBY GIVEN that the Project described below has been reviewed pursuant to the provisions of the California Environmental Quality Act of 1970 (Public Resources Code Section 21100, et seq.) and a determination has been made that it will have no significant effect upon the environment.
2. PROJECT NAME: Mendocino County Russian River Flood Control and Water Conservation Improvement District Redwood Valley Annexation Project (“**Project**”).
3. DESCRIPTION OF THE PROJECT: Filing of an application with the Mendocino County Local Agency Formation Commission to annex the Redwood Valley County Water District (“**RVCWD**”) into the RRFC. The Project Description is more fully set forth in the Initial Study for the Project. The purpose of the annexation is to allow RVCWD to contract with the RRFC to receive surface water supplies available under the RRFC’s licensed water right.
4. LOCATION OF PROJECT: The Project is located within Mendocino County as shown on the areas identified on the map attached as **EXHIBIT “A”**.
5. NAME AND ADDRESS OF PROJECT PROPONENT: Mendocino County Russian River Flood Control and Water Conservation Improvement District, PO Box 2104, Ukiah, CA 95482, (707) 462-5278.
6. MITIGATION MEASURES: None.
7. A copy of the Initial Study regarding the environmental effect of this Project is on file at the RRFC office at 304 North State Street, Ukiah, California, 95482. This study was:

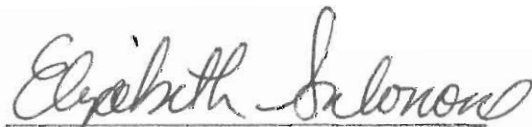
☒ Adopted as presented.

☐ Adopted with changes. Specific modifications supporting reasons are attached.
8. The RRFC considered and adopted this Negative Declaration at a public meeting of its Board of Directors on October 6, 2025.
9. DETERMINATION: *(To be completed by the Lead Agency).*

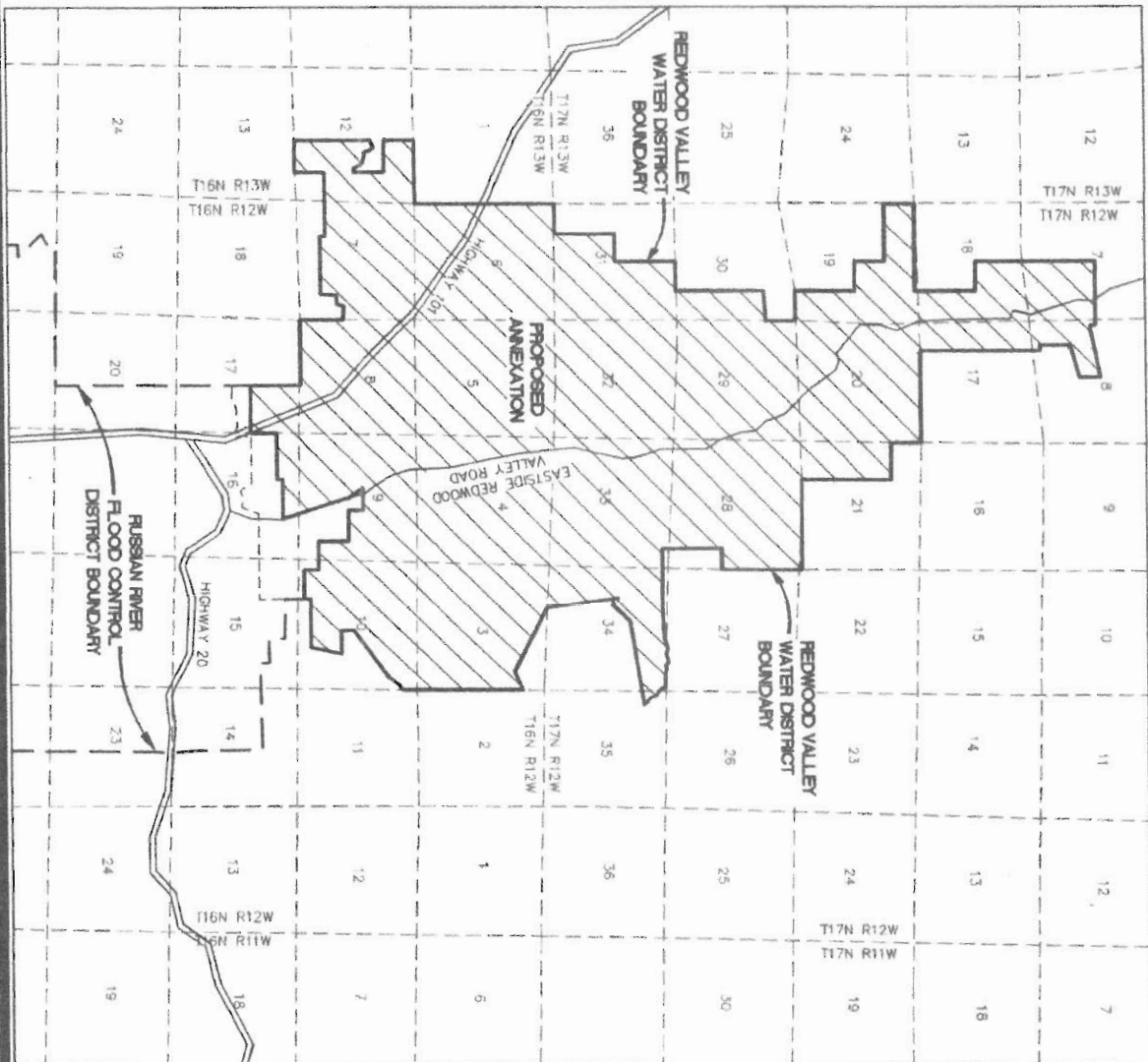
On the basis of this initial evaluation:

- ☒ I find that the proposed Project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

- ☐ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards; and (2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (1) have been adequately analyzed in an earlier EIR or NEGATIVE DECLARATION pursuant to the applicable standards, and (c) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.


Elizabeth Salomone

October 6, 2025
Date



LEGEND

- BOUNDARY OF LANDS TO BE ANNEXED
- EXISTING BOUNDARY OF RUSSIAN RIVER FLOOD CONTROL DISTRICT
- SECTION LINES
- OVERLAP OF RCHWD & RRCFD



THIS MAP HAS BEEN PREPARED BY STEVEN J. KLEIN
Steven J. Klein 06/18/25
 STEVEN J. KLEIN, P.L.S. 8155

LAFCO SITE PLAN

REDWOOD VALLEY COUNTY WATER DISTRICT
 REDWOOD VALLEY, CA



MUNSELLE CIVIL ENGINEERING
 CIVIL ENGINEERING • LAND SURVEYING
 519 CENTER STREET
 HEALDSBURG, CA 95448
 (707) 395-0968

JOB NO.
 129-25
 SHEET NO.
1
 OF 1 SHEETS

Mendocino County Clerk-Recorder

Date	Type	Reference	Original Amt.	Balance Due	10/9/2025 Discount	Payment
10/9/2025	Bill		3,018.75	3,018.75		3,018.75
					Check Amount	3,018.75

SBMC Checking filing fees for notice of declaration, RVCWD ann 3,018.75

Katrina Bartolomie, Clerk-Recorder
Mendocino County, CA
501 Low Gap Rd., Room 1020
Ukiah, Ca 95482

Receipt: 25-12654

Product	Name	Extended
NTDETER	Notice Of Determination	\$3,018.75
	#Pages	1
	Document #	2025-E0089
	#NegativeDecl	1
	#MitigatedNegativeDecl	0
	#EIR	0
	#Cert.Reg Program	0
	#ConformedLabels	1

Total \$3,018.75

Tender (Check) \$3,018.75

Check # 1824
Paid By MORRISWID

Thank You!

Fri Oct 10 14:39:55 PDT 2025 PST chrystal

RESOLUTION NO. 26-120

RESOLUTION OF THE MENDOCINO COUNTY BOARD OF SUPERVISORS APPROVING ZERO DOLLAR TAX SHARING AGREEMENT FOR THE RUSSIAN RIVER FLOOD CONTROL AND WATER CONSERVATION IMPROVEMENT DISTRICT (RRFC) (LAFCO FILE NO. A-2025-05)

WHEREAS, the Mendocino County Local Agency Formation Commission ("LAFCo") has received an application for a Change of Organization consisting of an annexation to incorporate the remaining jurisdictional boundaries of the Redwood Valley County Water District (RVCWD) not already located within the RRFC jurisdictional boundary as described in **Exhibit A**; and

WHEREAS, the aforementioned annexation is identified as LAFCo Application File No. A-2025-05, also known as the Mendocino County Russian River Flood Control and Water Conservation Improvement District Annexation; and

WHEREAS, prior to acting on the application, Revenue and Tax Code section 99(b)(6) requires LAFCo to receive resolution(s) from those bodies negotiating an agreement on a potentially revised distribution of property tax in the event the annexation becomes effective; and

WHEREAS, pursuant to Revenue and Taxation Code section 99(b)(5), the Mendocino County Board of Supervisors is the entity responsible for negotiating a tax sharing agreement under Revenue Taxation Code Section 99; and

WHEREAS, under Revenue and Taxation Code section 99, upon filing the Application, the Executive Office of LAFCo is required to give notice of the filing to the Mendocino County Assessor and Auditor-Controller specifying each local agency whose service area of responsibility will be altered by the jurisdictional change; and

WHEREAS, on October 21, 2025, the Executive Office of LAFCo gave notice of filing to the assessor and auditor-controller under Revenue and Taxation Code section 99(b); and

WHEREAS, in April 2, 2026, the Mendocino County Assessor provided the Mendocino County Auditor-Controller with a preliminary report which identifies the assessed valuations of the territory of RVCWD and the tax rate areas in which the territory exists; and

WHEREAS, on May 5, 2026 the Mendocino County Auditor-Controller estimated the amount of property tax revenue generated within the territory that is the subject of the jurisdictional change during the fiscal year 2025-26 and estimated what portion of said property tax revenue attributable to each local agency that receives a portion of said property tax revenue, which estimate is set forth in the attached **Exhibit B**; and

WHEREAS, the RRFC is bringing forward a resolution to their Board on July 6, 2026, a copy of which is attached hereto as **Exhibit C**, agreeing that there should be no change in the current apportionment of property tax, neither base tax nor future tax increment, in the Annexation Area.

NOW, THEREFORE, BE IT RESOLVED that in the event the annexation becomes effective, the existing shares of property tax will not change.

IT IS FURTHER RESOVLED AND ORDERED that the Clerk of the Board of Supervisors shall notify Mendocino County Auditor-Controller and the Mendocino Local Agency Formation Commission of sch negotiated zero exchange of property tax revenues by forwarding a certified copy of this resolution to the Auditor-Controller, the Russian River Flood Control & Water Conservation Improvement District, the Mendocino Local Agency Formation Commission, and, upon completion of the annexation, to the State Board of Equalization.

The foregoing Resolution introduced by Supervisor Haschak, seconded by Supervisor Norvell, and carried this 7th day of July, 2026, by the following vote:

AYES: Supervisors Mulheren, Haschak, Norvell, and Williams
NOES: None
ABSENT: Supervisor Cline

WHEREUPON, the Chair declared said Resolution adopted and SO ORDERED.

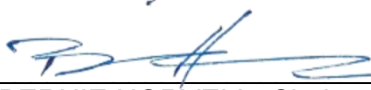
ATTEST: DARCIE ANTLE
Clerk of the Board



Deputy

APPROVED AS TO FORM:
KATHARINE L. ELLIOTT
Interim County Counsel





BERNIE NORVELL, Chair
Mendocino County Board of Supervisors

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

BY: DARCIE ANTLE
Clerk of the Board



Deputy

Resolution #26-04

of the
**Mendocino County Russian River Flood Control
& Water Conservation Improvement District**

**Approving a Zero Tax Sharing Agreement with the County of Mendocino
for the Annexation of the
Complete Redwood Valley County Water District Service Area
(LAFCo Application File No. A-2025-05)**

WHEREAS, the Mendocino County Russian River Flood Control & Water Conservation Improvement District (RRFC) has submitted an application to Mendocino Local Agency Formation Commission (LAFCo) proposing to annex the complete jurisdictional boundaries of the Redwood Valley County Water District (RVCWD) not already located within the RRFC jurisdictional boundary (Proposed Annexation), as shown and more particularly described in Exhibit A: Area to be Annexed (Proposed Annexation Area), attached hereto and incorporated herein by reference; and

WHEREAS, the Proposed Annexation is identified as LAFCo Application File No A-2025-05 also known as the “RRFC Annexation of RVCWD’s Complete Service Area”; and

WHEREAS, California Revenue and Taxation Code (RTC) section 99 requires the County of Mendocino (County) and RRFC to enter into an agreement providing for an exchange of tax revenues in connection with the Proposed Annexation (Tax Sharing Agreement); and

WHEREAS, the RRFC proposes a Tax Sharing Agreement providing for a zero percent (0%) exchange of property tax revenues for the Proposed Annexation Area, consistent with applicable law; and

WHEREAS, the proposed Tax Sharing Agreement applies solely to the District and County shares of property tax revenue generated within the Proposed Annexation Area, if any, and does not affect the allocation of property tax revenues for any other taxing entity; and

WHEREAS, prior to acting on the Proposed Annexation application, RTC §99(b)(6) requires LAFCo to receive resolution(s) from those bodies negotiating a Tax Sharing Agreement on a potentially revised distribution of property tax in the event that the Proposed Annexation becomes effective; and

WHEREAS, pursuant to RTC §99(b)(6), the Mendocino County Board of Supervisors is the entity responsible for negotiating a Tax Sharing Agreement on behalf of special districts under RTC §99; and

WHEREAS, on May 5, 2025, LAFCo adopted a Municipal Service Review and Sphere of Influence Update for RRFC that identifies the Proposed Annexation Area as within the RRFC Sphere of Influence; and

WHEREAS, under RTC §99, upon filing the Proposed Annexation application to LAFCo, the Executive Officer of LAFCo is required to give notice of the Proposed Annexation application to the Mendocino County Assessor and Auditor-Controller specifying each local agency whose service area or service responsibility will be altered by the jurisdictional change proposed by the Proposed Annexation; and

WHEREAS, on May 5, 2026, the Mendocino County Assessor and Auditor-Controller notified governing bodies of each local agency whose service area or service responsibility will be altered by the jurisdictional change proposed by the Proposed Annexation of the amount of estimated property tax revenue that is subject to negotiated exchange; and

WHEREAS, the RRFC and the Mendocino County Board of Supervisors desire to approve a Tax Sharing Agreement providing for a zero property tax exchange for the Proposed Annexation Area in order to satisfy the requirements of RTC §99; and

WHEREAS, the RRFC Board has considered the oral and/or written testimony made by any affected local agencies or interested persons provided prior to or appearing at the properly noticed Regular Board of Trustees Meeting of July 6, 2026.

NOW, THEREFORE, BE IT RESOLVED by the RRFC Board of Trustees that in the event the Proposed Annexation becomes effective, the existing shares of property tax will not change; and

IT IS FURTHER RESOLVED AND ORDERED that RRFC shall notify Mendocino County Auditor-Controller and the Mendocino Local Agency Formation Commission of such negotiated zero exchange of property tax revenues by forwarding this fully executed resolution to the Auditor-Controller, the Mendocino County Board of Supervisors, the Mendocino Local Agency Formation Commission, and, upon completion of the annexation, to the State Board of Equalization.

ADOPTED 6th day of July, 2026, by the Board of Trustees of the Mendocino County Russian River Flood Control & Water Conservation Improvement District, by the following vote:

Christopher Watt, President	<u>Yes</u> / No / Abstain / Absent
John Reardan, Vice President	<u>Yes</u> / No / Abstain / Absent
Tyler Rodrigue, Treasurer	<u>Yes</u> / No / Abstain / Absent
John Bailey, Trustee	<u>Yes</u> / No / Abstain / Absent
Dave Koball, Trustee	<u>Yes</u> / No / Abstain / Absent

Signed:


Christopher Watt, Board of Trustees President

7/6/26
Date

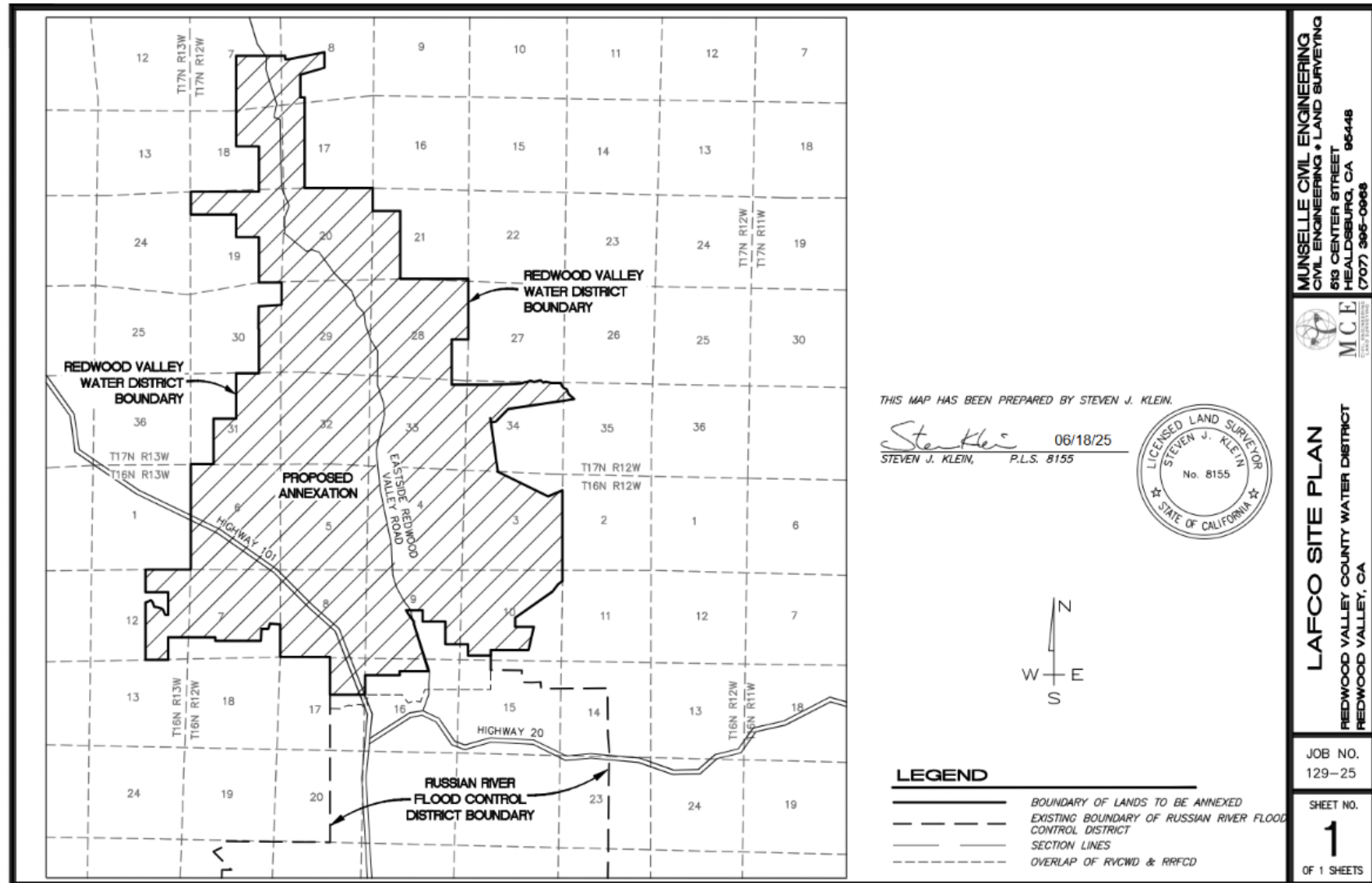
Attest:


Elizabeth Salomone, General Manager

7/6/26
Date

Exhibit A

Annexation Area Plat & Legal Description



Beginning at the southwest corner of the T17N, R12W, M.D.B. & M. being the southwest corner of Section 31 of said Township; thence East along the south line of said section, 1/4 mile; thence North 1/2 mile; Thence East 1/4 mile to the center of said Section; thence North 1/2 mile to the south line of Section 30; Thence East 1/4 mile; Thence North 1/2 mile more or less to the southwesterly corner of the lands described as the Gabrielli Winery Property Annexation to the Redwood Valley County Water District LAFCO No. 90-5 in the document recorded in Book 1882 of Official Records, at Page 294, Mendocino County Records;

Thence along the easterly boundary of said lands North 01°37'45" East 85.095 feet; Thence South 87°07'47" West 10.761 feet; Thence North 00°18'32" East 1322.596 feet to the northwest corner of said lands; Thence along the northerly boundary line of said lands North 86°02'03" East 1337.632 feet to the easterly line of Section 30;

Thence North along the easterly line of Section 30 to the southeast corner of Section 19; Thence West 1/4 mile along the south line of Section 19; Thence North 1/2 mile; Thence West 1/4 mile; Thence North 1/4 mile; Thence West 1/2 mile to the West line of Section 19; Thence North 1/4 mile to the southwest corner of Section 18; Thence East 3/4 mile along the south line of Section 18; Thence North 1/2 mile; Thence West 1/4 mile to the center of Section 18; Thence North 1/2 mile to the south 1/4 corner of Section 7; Thence North 1/2 mile to the center of Section 7; Thence East 1/2 mile to the west 1/4 section corner of Section 8; Thence South along the west line of Section 8, 208 feet, more or less, to the northwest corner of the lands of Donald J. Wright, as described in the deed recorded in Book 458, Page 571, Official Records Mendocino County, California; Thence along the north and east line of said lands of Wright, East 208 feet, South 208 feet more or less, and East 208 feet more or less, to the northeast corner thereof, being also the northwest corner of the lands of Marvin Cannon, as described in the deed recorded in Book 585, Page 134, Official Records Mendocino County; thence along the north line of said lands and the lands of R.W. Dorsey 2000 feet more or less, to the northeast corner of said lands as described in the deed recorded in Book 609, Page 247, Official Records Mendocino County, being the east line of the Southwest 1/4 of Section 8; Thence South along the east line of said Southwest 1/4, Section 8, 900 feet more or less, to the northeast corner of the Southeast 1/4 of the Southwest 1/4 of said Section 8; thence along the north line of said Southeast 1/4 of Southwest 1/4, Section 8, West 1/4 mile to the northwest corner thereof; Thence 1/4 mile South along the west line of said Southeast 1/4, Southwest 1/4 to the northeast corner of the northwest 1/4 of northwest 1/4, Section 17; Thence East 250 feet; Thence 1 mile South, more or less, along the east line of the west 1/2 of the west 1/2 of Section 17 to the northeast corner of the northwest 1/4 of northwest 1/4, Section 20; Thence East along the north line of Section 20, 3/4 mile to the northeast corner thereof; Thence 1/4 miles South along the east line of the northwest 1/4 of northwest 1/4, Section 21;

Continued

Thence East 1600 feet more or less along the south line of said section; thence South 3/4 mile to a point on the north line of Section 28; Thence East along said line 3/4 mile to the northwest corner of Section 27; thence 2/3 mile South along the west line of Section 28, more or less, to the southeast corner of the lands of Ford and Rawles as described in the deed recorded in Book 440, Page 512, Official Records, Mendocino County, thence West along the south line of said lands, 970 feet, more or less to a point on the east line of the lands of Geroge C. Hallett as described in the deed recorded in Book 582, Page 561, Official Records Mendocino County; Thence 1/2 mile south along the west line of said lands and the east line of the lands of M. Laforet; Thence East 2272 feet, more or less along the south line of said lands to the northeast corner of the lands of E.G. Lynch, as described in the deed recorded in Book 182, Page 43, Official Records, Mendocino County, said point being also the northwest corner of the lands described as the Redwood Valley Rancheria Property Annexation to the Redwood Valley County Water District recorded in Book 2171 of Official Records, Page 635, Mendocino County Records and northwest corner of the lands that are shown on that Record of Survey recorded in Map Case 2, Drawer 46, Page 56;

Thence around the boundary of said lands of Redwood Valley Rancheria Property Annexation North 87°57'52" East, 1434.66 feet to the northeast corner of Lot 19 of the Finnish Colony Subdivision thereof recorded in Case 1, Drawer 4, Page 89, Mendocino County Records; thence along an existing fence as shown on said Record of Survey the following courses: North 85°28'24" East, 368.20 feet; thence north 71°05'33" East, 121.36 feet; thence North 72°02'50" East, 99.31 feet; thence North 89°03'35" East, 64.30 feet; thence north 75°25'31" East 125.45 feet; thence North 71°34'19" East, 127.42 feet; thence South 75°51'55" East, 219.47 feet; thence North 74°53'05" East, 375.29 feet; thence South 44°18'56" East, 20.95 feet; thence South 52°00'55" East, 90.24 feet; thence South 53°28'34" East, 117.93 feet; thence North 68°51'22" East, 132.74 feet; thence South 77°52'39" East, 339.04 feet; thence North 88°29'31" East, 537.44 feet; thence South 25°52'03" East, 220.82 feet; thence South 38°00'11" East, 146.95 feet; thence South 65°57'46" East, 201.77 feet; thence South 20°46'37" East, 272.91 feet; thence South 48°08'19" East, 446.29 feet; thence leaving said fence as shown on said map South 81°28'32" West, 3884.84 feet; thence South 44°20'25" West, 1029.15 feet; thence South 82°11'42" West, 265 feet to the southwest corner of Lot 20 of said Finnish Colony Subdivision;

Thence South 8 degrees East 2924.8 feet, more or less, to the northwest corner of Lot 15 of said Finnish Colony Subdivision; thence south 64 degrees East 3265 feet; thence North 67 degrees East, 900 feet to the east line of the Yokayo Rancho; thence South 1 mile, more or less to the southeast corner of the lands of John Barrella as described in the deed recorded in Book 168, Page 295, Official Records, Mendocino County; thence South 55 degrees West 316 feet, more or less; thence South 37 degrees West 532 feet; thence South 55 degrees West 2657 feet more or less;

Continued

Thence South 530 feet to the northwest corner of the lands of Lee Sorelles as described in the deed recorded in Book 445, Page 6, Official Records Mendocino County; thence East along the north line of said lands 1089 feet to the northeast corner; thence 1390 feet South 13 degrees West along the east line to the southeast corner thereof; thence 220 feet West along the south line of the lands of Jay Long as described in the deed recorded in Book 4321, Page 320, Official Records, Mendocino County, to the southwest corner of said lands of Long; thence South 320 feet, more or less, along the east line of Calpella Fruit Land Tract, as shown on the map thereof recorded in Case 1, Drawer 3, Page 18, Mendocino County Records, to the southeast corner of Lot 5 thereof;

Thence West along the south line of Lot 5 to the southwest corner of Lot 5; thence North along the west line of Lot 5 to the northwest corner of Lot 5; thence West along the south line of Lot 12 to the southwest corner of Lot 12; thence North along the west lines of Lots 11 and 12 to the southeast corner of Lot 18; thence West along the south line of Lot 18 to the southwest corner of Lot 18; thence North along the west line of Lot 18 to the northwest corner of Lot 18; thence West along the southerly line of Lot 33 and the westerly projection thereof to the intersection of the west line of the County Road with the westerly projection of the southerly line of Lot 33; thence southerly along the west line of the County Road to the southeast corner of Lot 32; thence West along the south line of Lot 32 to the intersection thereof with the center of the channel of the Russian River, thence along the center of the channel of the Russian River to the northerly line of Lot 108, Yokayo Rancho; Thence along the northerly line of Lot 108, West, South, and West to the southwest corner of the lands of Fred Finne as described in the deed recorded in Book 405, Page 130, Official Records, Mendocino County;

Thence North 2200 feet along the west line of said lands; thence West 2900 feet; thence North 1900 feet to the southeast corner of the Del Arbbres Subdivision, as shown on the map recorded in Case 1, Drawer 10, Page 15, Mendocino County Records; thence North 85 degrees West 600 feet; thence South 17 degrees West 330 feet; thence West 400 feet; thence South 3 degrees West 490 feet; thence West 2570 feet on the south line of said subdivision to the southwest corner thereof; thence North along the west line of said subdivision to the southeast corner of Lot 3 of Section 7, Township 16 North, Range 12 West, M.D.B. & M.;

Thence West along the southerly boundary of said Lot 3 to the southeast corner of the north 1/2 of the southeast 1/4 of Section 12, Township 16 North, Range 12 West, M.D.B. & M.; thence West along the southerly boundary of said north 1/2 of the southeast 1/4 of said Section 12 to the northeast corner of the southwest 1/4 of the southeast 1/4 of said Section 12; thence South along the easterly boundary of the southwest 1/4 of the southeast 1/4 of said Section 12 to the southerly boundary of Section 12; thence West along the southerly boundary of Section 12 to the southwesterly corner of the southwest 1/4 of the southeast 1/4 of Section 12;

Continued

Thence North along the westerly boundary of the east 1/2 of Section 12 to Seward Creek; thence southeasterly along Seward Creek to the westerly boundary of the southeast 1/4 of the northeast 1/4 of Section 12; thence North along the westerly boundary of the southeast 1/4 of the northeast 1/4 of Section 12 to the southerly boundary of the north 1/2 of the northeast 1/4 of Section 12; thence West along the southerly boundary of the north 1/2 of the northeast 1/4 of Section 12 to the southwesterly corner thereof; thence North along the westerly boundary of the north 1/2 of the northeast 1/4 of Section 12 to the northerly boundary line of said Section 12; thence East along the northerly boundary line of Section 12 to the northeast corner of said Section 12 and the southwest corner of Section 6, Township 16 North, Range 12 West, M.D.B. & M.;

Thence North 1 mile, more or less, along the west line of Section 6 to the Point of Beginning.

This description was prepared by me or under my direct supervision in June 2025.



6/18/2025

Steven J. Klein, PLS 8155

Date



End of Description

MENDOCINO LOCAL AGENCY FORMATION COMMISSION

RESOLUTION NO. 2026-27-04

**CONDITIONALLY APPROVING THE MENDOCINO COUNTY RUSSIAN RIVER FLOOD
CONTROL AND WATER CONSERVATION IMPROVEMENT DISTRICT ANNEXATION OF
REDWOOD VALLEY COUNTY WATER DISTRICT SERVICE AREA (FILE NO. A-2025-05) AND
FINDINGS PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT**

WHEREAS, the Mendocino Local Agency Formation Commission (LAFCo), hereinafter referred to as the “Commission”, administers California Government Code (GOV) Section (§) 56000 et. seq., known as the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000; and

WHEREAS, on September 11, 2025, the Mendocino County Russian River Flood Control and Water Conservation Improvement District (RRFC) distributed a Notice of Intent to adopt a resolution of application to each affected local agency as required by GOV § 56654; and

WHEREAS, on October 6, 2025, the RRFC Board of Trustees adopted Resolution No. 25-07 to initiate a change of organization involving annexation of the portion of the Redwood Valley County Water District (RVCWD) service area not already within the RRFC boundary, approximately 9,610 acres, in cooperation with RVCWD under its supporting Resolution No. 25-02 adopted on April 17, 2025; and

WHEREAS, the purpose of the proposal is to allow RVCWD to put contracted and surplus water available under its existing Uniform Water Sale & Purchase Agreement with RRFC to beneficial use anywhere within the RVCWD service area, not just the 200-acre portion (overlap area) currently within the RRFC jurisdictional boundary; and

WHEREAS, the annexation area contains the following Mendocino County zoning designations: Agricultural, Rangeland/Forest Land, Residential, and Commercial/Industrial; and

WHEREAS, the proposed annexation area is located within RRFC’s sphere of influence boundary adopted by the Commission on May 5, 2025 per LAFCo Resolution No. 2024-25-15; and

WHEREAS, on July 7, 2026, the Mendocino County Board of Supervisors adopted Resolution No. 26-120 approving a zero dollar tax sharing agreement for the proposed annexation, which is substantially similar to Resolution No. 26-04 adopted by the RRFC Board of Trustees on July 6, 2026 approving a zero tax sharing agreement for this annexation proposal; and

WHEREAS, a Certificate of Filing was issued on September 14, 2026 indicating receipt of a complete application pursuant to GOV §56658; and

WHEREAS, the Executive Officer gave sufficient notice of a public hearing to be conducted by the Commission in the form and manner prescribed by law; and

WHEREAS, Mendocino LAFCo, as a Responsible Agency, independently reviewed and considered the Lead Agency’s (RRFC) Revised Initial Study and Proposed Negative Declaration for the Mendocino County Russian River Flood Control and Water Conservation Improvement District Redwood Valley Annexation project adopted on October 6, 2025 under SCH No. 2025061147 and associated Notice of Determination filed on October 10, 2025 under Mendocino County Clerk-Recorder No. 2025-E0089, in connection with consideration of the annexation proposal, and determined that the environmental

determination and associated documents were prepared in accordance with the requirements of CEQA and are adequate for the proposed action before the Commission; and

WHEREAS, the proposal meets the statutory criteria outlined in LAFCo law and adopted local policy requirements; and

WHEREAS, the Executive Officer's report, which included factors for consideration required under GOV § 56668 and recommendations on the proposal required under GOV § 56665, was presented to the Commission in the manner provided by law and adopted local policy; and

WHEREAS, the Commission heard and fully considered all the testimony and evidence presented at a public hearing on the proposal on October 5, 2026; and

WHEREAS, the Commission has reviewed and considered this resolution and hereby finds that it accurately sets forth the intentions of the Commission with respect to the proposal.

NOW, THEREFORE, BE IT RESOLVED that the Mendocino Local Agency Formation Commission DOES HEREBY RESOLVE, DETERMINE AND ORDER as follows:

Section 1. Incorporation of Recitals

The foregoing recitals are true and correct and are hereby incorporated into the Resolution as findings of the Commission.

Section 2. CEQA Findings

Acting as a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), the Commission hereby independently finds and determines, based on the whole of the administrative record, that the Negative Declaration (SCH No. 2025061147) adopted by the Mendocino County Russian River Flood Control and Water Conservation Improvement District, as Lead Agency for the project, is adequate for the Commission's action. (CEQA Guidelines § 15096.)

Section 3. Conditional Approval of Proposal

The Commission hereby approves the Mendocino County Russian River Flood Control and Water Conservation Improvement District Annexation of Redwood Valley County Water District service area (File No. A-2025-05), subject to the following terms and conditions.

- a) The boundaries of the approved annexation territory shall be defined by the written geographic description in Exhibit "A" and map in Exhibit "B", attached hereto and incorporated herein by reference.
- b) The annexation proposal is assigned the following distinctive short-term designation: "RRFC Annexation of RVCWD (A-2025-05)".
- c) The annexation territory shall be subject to all Mendocino County Russian River Flood Control and Water Conservation Improvement District ordinances, resolutions, policies, fees, and regulations in effect upon recordation of the Certificate of Completion.
- d) This approval does not effect a consolidation of the RVCWD governance, services, operations, or obligations with RRFC nor consolidation of the two local government agencies.
- e) This approval does not negate, supersede, or otherwise impact Stipulated Judgment No. 42059.

Section 4. Protest Proceedings

The affected territory is inhabited as defined in GOV § 56046, and not all landowners within the territory have consented to the proposal. Protest proceedings therefore may not be waived under GOV § 56662(d). The Commission shall conduct protest proceedings under Part 4 of the Cortese-Knox-Hertzberg Act, commencing with GOV § 57000. It delegates to the Executive Officer, under GOV § 57000(c), the authority to conduct those proceedings.

Section 5. Certificate of Completion

- a) The Certificate of Completion shall not be filed until all charges assessed and fees due to the Commission have been paid by the applicant and all materials required for final processing of the proposal have been sufficiently prepared and submitted to the Executive Officer.
- b) The effective date of the annexation shall be the date of the filing of the Certificate of Completion with the Mendocino County Recorder's office.
- c) If a Certificate of Completion has not been filed within one year of adoption of this resolution, Commission proceedings for this change of organization shall be deemed terminated, unless an extension of time is approved by the Commission prior to October 5, 2027, consistent with GOV §57001.

PASSED AND ADOPTED by the Mendocino Local Agency Formation Commission this 5th day of October, 2026, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

MAUREEN MULHEREN, Commission Chair

ATTEST:

UMA HINMAN, Executive Officer

Exhibit "A"

Beginning at the southwest corner of the T17N, R12W, M.D.B. & M. being the southwest corner of Section 31 of said Township; thence East along the south line of said section, 1/4 mile; thence North 1/2 mile; Thence East 1/4 mile to the center of said Section; thence North 1/2 mile to the south line of Section 30; Thence East 1/4 mile; Thence North 1/2 mile more or less to the southwesterly corner of the lands described as the Gabrielli Winery Property Annexation to the Redwood Valley County Water District LAFCO No. 90-5 in the document recorded in Book 1882 of Official Records, at Page 294, Mendocino County Records;

Thence along the westerly boundary of said lands North 01°37'45" East 85.095 feet; Thence South 87°07'47" West 10.761 feet; Thence North 00°18'32" East 1322.596 feet to the northwest corner of said lands; Thence along the northerly boundary line of said lands North 86°02'03" East 1337.632 feet to the easterly line of Section 30;

Thence North along the easterly line of Section 30 to the southeast corner of Section 19; Thence West 1/4 mile along the south line of Section 19; Thence North 1/2 mile; Thence West 1/4 mile; Thence North 1/4 mile; Thence West 1/2 mile to the West line of Section 19; Thence North 1/4 mile to the southwest corner of Section 18; Thence East 3/4 mile along the south line of Section 18; Thence North 1/2 mile; Thence West 1/4 mile to the center of Section 18; Thence North 1/2 mile to the south 1/4 corner of Section 7; Thence North 1/2 mile to the center of Section 7; Thence East 1/2 mile to the west 1/4 section corner of Section 8; Thence South along the west line of Section 8, 208 feet, more or less, to the northwest corner of the lands of Donald J. Wright, as described in the deed recorded in Book 458, Page 571, Official Records Mendocino County, California; Thence along the north and east line of said lands of Wright, East 208 feet, South 208 feet more or less, and East 208 feet more or less, to the northeast corner thereof, being also the northwest corner of the lands of Marvin Cannon, as described in the deed recorded in Book 585, Page 134, Official Records Mendocino County; thence along the north line of said lands and the lands of R.W. Dorsey 2000 feet more or less, to the northeast corner of said lands as described in the deed recorded in Book 609, Page 247, Official Records Mendocino County, being the east line of the Southwest 1/4 of Section 8; Thence South along the east line of said Southwest 1/4, Section 8, 900 feet more or less, to the northeast corner of the Southeast 1/4 of the Southwest 1/4 of said Section 8; thence along the north line of said Southeast 1/4 of Southwest 1/4, Section 8, West 1/4 mile to the northwest corner thereof; Thence 1/4 mile South along the west line of said Southeast 1/4, Southwest 1/4 to the northeast corner of the northwest 1/4 of northwest 1/4, Section 17; Thence East 250 feet; Thence 1 mile South, more or less, along the east line of the west 1/2 of the west 1/2 of Section 17 to the northeast corner of the northwest 1/4 of northwest 1/4, Section 20; Thence East along the north line of Section 20, 3/4 mile to the northeast corner thereof; Thence 1/4 miles South along the west line of the northwest 1/4 of northwest 1/4, Section 21;

Continued

Thence East 1600 feet more or less along the south line of the NW 1/4 of the NW 1/4 of said section; thence South 3/4 mile to a point on the north line of Section 28; Thence East along said line 3/4 mile to the northwest corner of Section 27; thence 2/3 mile South along the west line of Section 27, more or less, to the southeast corner of the lands of Ford and Rawles as described in the deed recorded in Book 440, Page 512, Official Records, Mendocino County, thence West along the south line of said lands, 970 feet, more or less to a point on the east line of the lands of George C. Hallett as described in the deed recorded in Book 582, Page 561, Official Records Mendocino County; Thence 1/2 mile south along the west line of said lands and the east line of the lands of M. Laforet; Thence East 2272 feet, more or less along the south line of said lands to the northeast corner of the lands of E.G. Lynch, as described in the deed recorded in Book 182, Page 43, Official Records, Mendocino County, said point being also the northwest corner of the lands described as the Redwood Valley Rancheria Property Annexation to the Redwood Valley County Water District recorded in Book 2171 of Official Records, Page 635, Mendocino County Records and northwest corner of the lands that are shown on that Record of Survey recorded in Map Case 2, Drawer 46, Page 56;

Thence around the boundary of said lands of Redwood Valley Rancheria Property Annexation North 87°57'52" East, 1434.66 feet to the northeast corner of Lot 19 of the Finnish Colony Subdivision thereof recorded in Case 1, Drawer 4, Page 89, Mendocino County Records; thence along an existing fence as shown on said Record of Survey the following courses: North 85°28'24" East, 368.20 feet; thence north 71°05'33" East, 121.36 feet; thence North 72°02'50" East, 99.31 feet; thence North 89°03'35" East, 64.30 feet; thence north 75°25'31" East 125.45 feet; thence North 71°34'19" East, 127.42 feet; thence South 75°51'55" East, 219.47 feet; thence North 74°53'05" East, 375.29 feet; thence South 44°18'56" East, 20.95 feet; thence South 52°00'55" East, 90.24 feet; thence South 53°28'34" East, 117.93 feet; thence North 68°51'22" East, 132.74 feet; thence South 77°52'39" East, 339.04 feet; thence North 88°29'31" East, 537.44 feet; thence South 25°52'03" East, 220.82 feet; thence South 38°00'11" East, 146.95 feet; thence South 65°57'46" East, 201.77 feet; thence South 20°46'37" East, 272.91 feet; thence South 48°08'19" East, 446.29 feet; thence leaving said fence as shown on said map South 81°28'32" West, 3884.84 feet; thence South 44°20'25" West, 1029.15 feet; thence South 82°11'42" West, 265 feet to the southeast corner of Lot 20 of said Finnish Colony Subdivision;

Thence South 8 degrees East 2924.8 feet, more or less, to the northwest corner of Lot 15 of said Finnish Colony Subdivision; thence south 64 degrees East 3265 feet; thence North 67 degrees East, 900 feet to the east line of the Yokayo Rancho; thence South 1 mile, more or less to the southeast corner of the lands of John Barrella as described in the deed recorded in Book 168, Page 295, Official Records, Mendocino County; thence South 55 degrees West 316 feet, more or less; thence South 37 degrees West 532 feet; thence South 55 degrees West 2657 feet more or less;

Continued

Thence South 530 feet to the northwest corner of the lands of Lee Sorelles as described in the deed recorded in Book 445, Page 6, Official Records Mendocino County; thence East along the north line of said lands 1089 feet to the northeast corner; thence 1390 feet South 13 degrees West along the east line to the southeast corner thereof; thence 220 feet West along the south line of the lands of Jay Long as described in the deed recorded in Book 445, Page 7, and Book 431, Page 320, Official Records, Mendocino County, to the southwest corner of said lands of Long; thence South 320 feet, more or less, along the east line of Calpella Fruit Land Tract, as shown on the map thereof recorded in Case 1, Drawer 3, Page 18, Mendocino County Records, to the southeast corner of Lot 5 thereof;

Thence West along the south line of Lot 5 to the southwest corner of Lot 5; thence North along the west line of Lot 5 to the northwest corner of Lot 5; thence West along the south line of Lot 12 to the southwest corner of Lot 12; thence North along the west lines of Lots 11 and 12 to the southeast corner of Lot 18; thence West along the south line of Lot 18 to the southwest corner of Lot 18; thence North along the west line of Lot 18 to the northwest corner of Lot 18; thence West along the southerly line of Lot 33 and the westerly projection thereof to the intersection of the west line of the County Road with the westerly projection of the southerly line of Lot 33; thence southerly along the west line of the County Road to the southeast corner of Lot 32; thence West along the south line of Lot 32 to the intersection thereof with the center of the channel of the Russian River, thence along the center of the channel of the Russian River to the northerly line of Lot 108, Yokayo Rancho; Thence along the northerly line of Lot 108, West, South, and West to the southwest corner of the lands of Fred Finne as described in the deed recorded in Book 405, Page 130, Official Records, Mendocino County;

Thence North 2200 feet along the west line of said lands; thence West 2900 feet; thence North 1900 feet to the southeast corner of the Del Arbbres Subdivision, as shown on the map recorded in Case 1, Drawer 10, Page 15, Mendocino County Records; thence North 85 degrees West 600 feet; thence South 17 degrees West 330 feet; thence West 400 feet; thence South 3 degrees West 490 feet; thence West 2570 feet on the south line of said subdivision to the southwest corner thereof; thence North along the west line of said subdivision to the southeast corner of Lot 3 of Section 7, Township 16 North, Range 12 West, M.D.B. & M.;

Thence West along the southerly boundary of said Lot 3 to the southeast corner of the north 1/2 of the southeast 1/4 of Section 12, Township 16 North, Range 13 West, M.D.B. & M.; thence West along the southerly boundary of said north 1/2 of the southeast 1/4 of said Section 12 to the northeast corner of the southwest 1/4 of the southeast 1/4 of said Section 12; thence South along the easterly boundary of the southwest 1/4 of the southeast 1/4 of said Section 12 to the southerly boundary of Section 12; thence West along the southerly boundary of Section 12 to the southwesterly corner of the southwest 1/4 of the southeast 1/4 of Section 12;

Continued

Thence North along the westerly boundary of the east 1/2 of Section 12 to Seward Creek; thence southeasterly along Seward Creek to the westerly boundary of the southeast 1/4 of the northeast 1/4 of Section 12; thence North along the westerly boundary of the southeast 1/4 of the northeast 1/4 of Section 12 to the southerly boundary of the north 1/2 of the northeast 1/4 of Section 12; thence West along the southerly boundary of the north 1/2 of the northeast 1/4 of Section 12 to the southwesterly corner thereof; thence North along the westerly boundary of the north 1/2 of the northeast 1/4 of Section 12 to the northerly boundary line of said Section 12; thence East along the northerly boundary line of Section 12 to the northeast corner of said Section 12 and the southwest corner of Section 6, Township 16 North, Range 12 West, M.D.B. & M.;

Thence North 1 mile, more or less, along the west line of Section 6 to the Point of Beginning.

This description was prepared by me or under my direct supervision in November 2025.



11/5/2025

Steven J. Klein, PLS 8155

Date



End of Description

Steven J. Klein 06/18/25
STEVEN J. KLEIN, P.L.S. 8155



I, _____,
CHAIRMAN OF THE BOARD OF DIRECTORS OF THE RUSSIAN RIVER
FLOOD CONTROL DISTRICT HEREBY CERTIFY THAT SAID BOARD OF
DIRECTORS DID BY RESOLUTION DATED _____, 2025,
APPROVE THE WITHIN MAP.

CHAIRMAN, RUSSIAN RIVER FLOOD CONTROL DISTRICT
BOARD OF DIRECTORS

_____,
 CHAIRMAN OF THE LOCAL AGENCY FORMATION COMMISSION OF THE
 COUNTY OF MENDOCINO, STATE OF CALIFORNIA, HEREBY CERTIFY
 THAT SAID LOCAL AGENCY FORMATION COMMISSION BY RESOLUTION
 ON THE _____ DAY OF _____, 2025, APPROVED THE
 WITHIN MAP.

CHAIRMAN, LOCAL AGENCY FORMATION COMMISSION

The map displays a grid of sections numbered 1 through 36. The proposed annexation area is shaded with diagonal lines and labeled "PROPOSED ANNEXATION". The area is bounded by the Redwood Valley Water District Boundary to the north and east, and the Russian River Flood Control District Boundary to the south. The map also shows Highway 101 and Highway 20. Section numbers are provided for each section in the grid.

REDWOOD VALLEY WATER DISTRICT BOUNDARY

PROPOSED ANNEXATION

RUSSIAN RIVER FLOOD CONTROL DISTRICT BOUNDARY

HIGHWAY 101

HIGHWAY 20

EASTSIDE REDWOOD VALLEY ROAD

T17N R13W
T17N R12W

T17N R12W
T17N R11W

T17N R13W
T16N R13W

T17N R12W
T16N R12W

T16N R13W
T16N R12W

T16N R12W
T16N R11W

VICINITY MAP NO SCALE

RECORDED _____, 2025

INSTRUMENT NUMBER _____
MENDOCINO COUNTY RECORDS.

_____ BOUNDARY OF LANDS TO BE ANNEXED
 - - - - - EXISTING BOUNDARY OF RUSSIAN RIVER FLOOD
 CONTROL DISTRICT
 _____ SECTION LINES
 - - - - - OVERLAP OF RVCWD & RRFCD
 POB POINT OF BEGINNING



M C E
CIVIL ENGINEERING
LAND SURVEYING

CIVIL ENGINEERING ♦ LAND SURVEYING
513 CENTER STREET
HEALDSBURG, CA 95448
(707) 395-0968

STATE OF CALIFORNIA

MAPS

DRAWER _____

PAGE