

February 3, 2017



Via-Email

Commissioners of LAFCO of Napa County  
1030 Seminary Street, B  
Napa, CA 94559

**Re: Potential Sphere of Influence Update for the Congress Valley Water District (CVWD)**

Dear Chairwoman Dillon and members of the Local Agency Formation Commission of Napa County:

The Napa County Farm Bureau would like to thank the Commission for the opportunity to comment on the potential Sphere of Influence (SOI) update for CVWD.

The Napa County Farm Bureau supports LAFCO's staff recommendation to conduct a Municipal Service Review for the Congress Valley Water District prior to any consideration to expand its Sphere of Influence. Napa County Farm Bureau would be opposed to the expansion of the SOI for CVWD based on the following points:

1. The need to seriously consider any potential growth-inducing impacts of expansion of the SOI or extension of city water. The urbanizing effect of extending services where urbanization is unintended cannot be ignored.
2. The CVWD's SOI should not include agricultural and open-space lands.
3. The potential expansion of the SOI would appear to require an extension of more than 1,000 feet, contravening LAFCO policy.
4. Expansion would promote premature conversion of ag or open space lands to urban uses.
5. It has not been documented that the expansion of the SOI is necessary to respond to a public health & safety threat, as required by LAFCO's "General Policy Determinations" Section III.D.3.(a), 'Exclusion of Agricultural and Open-Space Lands.'

The approval and construction of the Carneros Inn project was based on assertions by project proponents of sufficient groundwater availability. The remedy is reduction in water use to coincide with existing groundwater resources. Approved projects should be accountable for staying within sources of water identified during the hearing process on which the approval was based. If in reality insufficient water exists for the project's approved use, the project should be required to reduce activities until the intensity of use corresponds with the actual water available.

We thank you for your consideration of these points and for the opportunity to provide comment on the MSR and SOI for the Congress Valley Water District.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cio Perez', is written over a faint, larger version of the same signature.

Cio Perez, Land Use Chairman  
Napa County Farm Bureau