



# CALIFORNIA FARM BUREAU FEDERATION

LEGAL SERVICES DIVISION

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October 2, 2020

**Via E-mail - [bfreeman@napa.lafco.co.gov](mailto:bfreeman@napa.lafco.co.gov)**

Napa County Local Agency Formation Commission  
1030 Seminary Street, Suite B  
Napa, CA 94559-2814

Re: October 5, 2020 Meeting – **Agenda Item # 7a**  
Draft Municipal Services Review – Recommendation for County Water Agency

Dear Members of the Commission:

The California Farm Bureau Federation and the Napa County Farm Bureau (collectively “Farm Bureau”) write to respectfully request that the Commission defer adoption of that portion of its draft Countywide Water and Wastewater Municipal Services Review (“Draft MSR”) which contains its core recommendation as to the formation of a county water agency or district.

The California Farm Bureau Federation (“CFBF”) is a non-governmental, nonprofit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. CFBF is California’s largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 34,000 agricultural, associate, and collegiate members in 56 counties. This membership includes more than 1,100 members of the Napa County Farm Bureau, within the County of Napa. CFBF strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources. A key policy interest of CFBF’s membership relates to the protection of California’s water supplies for agriculture, as underpinned by reliable and cost-effective deliveries.

The Draft MSR contains a strong call for the formation of a county water agency or district, either as a matter of special-act legislation or under the auspices of the Water Code. Farm Bureau appreciates the Commission’s introduction of this issue in the Draft MSR, but believes strongly that additional analysis and public discussion should occur before an ultimate recommendation is written into the Draft MSR on this subject. A countywide water agency would inevitably have



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long-term and very permanent implications for the face of Napa County as a matter of land use, and host of issues deserves further exploration before a recommendation is made – including not only what authority and governance structure the agency would have, but what its relationship with existing water agencies would be within Napa County, and what ultimate effects formation of the agency would have on water services and rates. The Draft MSR defers some of these issues, but Farm Bureau believes they can and should be explored in greater detail before the Draft MSR is adopted.

Additionally, while the Draft MSR points out a number of “benefits” in a bulletized list which supports its recommendation, it does not fully explore the potential drawbacks of a county water agency as an overlay on top of existing water service providers – a balanced discussion that we believe would benefit from additional staff work and public process. It does raise several very thorny “challenges” that might arise, based on similar cases – such as consensus among affected agencies and concerns about loss of local control, as well as the issues of costs and governance – but these potential “cons” of a countywide water agency could be more fully developed with additional time and stakeholder participation. Minimally, land use consequences such as annexations into agricultural lands must be addressed, as well as the potential agency’s interaction or overlap with a groundwater agency formed for purposes of implementing the State of California’s new Sustainable Groundwater Management Act (“SGMA”).

Finally, we point out that both the COVID-19 crisis and the ongoing wildfire crisis have distracted some of the best minds from participation in due public discussion of this and other important policy issues, and given the far-reaching implications of the formation of a county water agency for both water resources service and development and land use within Napa County itself, it would seem that this concept should be further developed at a considered pace when key stakeholders are able to effectively engage in the public process that will lead to the very best outcomes for the County of Napa.

Farm Bureau appreciates your consideration of this request for a deferred adoption of the Draft MSR, and looks forward to the Commission’s meeting on Monday.

Very truly yours,

CALIFORNIA FARM BUREAU FEDERATION

A handwritten signature in blue ink, appearing to read 'C. Scheuring', with a stylized flourish at the end.

Christian C. Scheuring  
Managing Counsel

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Ryan Klobas  
Chief Executive Officer

cc: Napa County Board of Supervisors (via Clerk of The Board)

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