

I. Water Supply and Reliability Rationale

1. Please provide the clear justification for the annexation.
 - a) The application (justification) and the FAQ states that annexation would increase water supply and reliability for RVCWD. Other documentation acknowledges that RRFC has no true surplus once existing customer contracts are honored. Please reconcile and explain.
 - b) If, as stated in the revised IS/ND and response to LAFCo comments, annexation does not increase the amount of water available to RVCWD (only *where* the existing 328.85 AF Agreement quantity may be used), what is the non-water-supply justification for the annexation?
2. Please provide RRFC's actual water demand/supply balance sheet for the past 10-15 years:
 - a) How much of the 7,940 AF entitlement under License No. 13898 is currently under contract?
 - b) How much has historically been available as surplus in wet versus dry years?
 - c) How much of that surplus water was made available for RVCWD under the 1980 Stipulated Judgment?

II. Impacts on Existing RRFC Customers

3. Please explain how the annexation will affect the pro-rata shortage allocation applied to existing agricultural customers during a drought, given that all of RRFC's 7,940 AF license is already under contract.
4. If annexation will not change the amount of any existing customer's Agreement, how does this fully address the concern that expanding into the annexation area could increase actual draw on the shared supply during shortage years, even if contract quantities on paper remain unchanged?
5. Please provide explanation and/or documentation that supports the assertion that there is no disadvantage to existing customers from the annexation.

III. Domestic Water Priority and Drought Allocation

6. The application states that domestic and agricultural uses are treated identically under pro-rata shortage allocation and that annexation does not change this. Does this fully address the CEQA petitioner's concern regarding domestic-use priority protections that may apply under SWRCB curtailment rules or human health and safety provisions during drought? This is a question under CKH as well.
7. Under what specific conditions can domestic water supply be legally prioritized above agricultural supply within RRFC's system, and would annexation change the number of domestic connections eligible for such prioritization?
8. Does the annexation increase the number of beneficial users within RRFC's boundary who could qualify for the SWRCB human health and safety waiver during a future drought curtailment?

IV. Domestic Connection Moratorium (Court-Ordered)

9. What specific findings or conditions did the court identify as prerequisites to lifting the domestic connection moratorium on RVCWD, and has RRFC or RVCWD obtained a legal opinion addressing whether the proposed annexation satisfies or otherwise bears on any of those conditions (to support the assertion that the annexation "does not resolve the underlying issues that led to the service connection restrictions" as stated in the FAQ). Please explain and/or provide documentation.

10. Because annexation would allow RVCWD to use its existing 328.85 AF Agreement quantity across its entire service area, does this expansion address any part of the legal or infrastructure deficiency that led to the domestic moratorium?
11. Has RVCWD's Board taken any position on whether it intends to seek lifting of the court-ordered domestic moratorium following annexation, and if so, on what timeline?
12. Input and information from RVCWD regarding this annexation would be helpful.

V. Self-Imposed Irrigation Moratorium

13. What is the specific basis for RVCWD's self-imposed irrigation connection moratorium — is it based on raw water supply constraints, distribution infrastructure limitations, or some other factor?
14. If the irrigation moratorium is unrelated to raw water availability, why has RVCWD not already lifted it, given that a raw water agreement with RRFC already exists today (328.85 acre-feet/year) even without annexation?
15. Since annexation expands where RVCWD may use its existing contract quantity but does not increase that quantity, what specific operational or legal barrier currently prevents RVCWD from using that same water toward lifting the irrigation moratorium without annexation?
16. Does RVCWD have any internal analysis, engineering report, or board discussion addressing what would need to occur — annexation or otherwise — before either moratorium could be lifted?

VI. CEQA Negative Declaration and Growth Inducement

17. The ND concludes there is no growth inducement because the existing moratoria will remain in place. Does this conclusion rest on a fully supported factual record regarding the causes of the moratoria, or is it an assumption not tied to the actual conditions imposed by the court?
18. If annexation strengthens RVCWD's administrative record for a future petition to lift the domestic moratorium (by aligning RRFC's actual service boundary with its licensed place of use), does the ND's "no growth inducement" finding remain adequate, even if RRFC itself does not intend to make that argument?
19. Was the potential for future growth inducement considered if either moratorium is lifted after annexation is approved?

VII. CKH Act and LAFCo Policy Considerations

20. Assuming the annexation would enable the RRFC to contract directly with customers within the new territory, does RRFC's modest administrative capacity (one full-time employee, budget of approximately \$647,000 in total revenue) support its ability to administer a near-doubling of its contracting service area without additional staffing, infrastructure, or oversight capacity? Please explain.
21. What CKH Act factor under Government Code Section 56668 most strongly supports approval.

VIII. Regional Context

22. How does this annexation relate to, and interact with, the UVWA's ongoing consolidation efforts, given that RVCWD joined UVWA in 2024 and transferred its operational services to the City of Ukiah as of January 1, 2025?