Law Offices of
JOHN E. SHARP
24 Professional Center Parkway, Suite 110
San Rafael, CA 94903

John E. Sharp
john@johnsharplaw.com

Telephone: (415) 479-1645

July 6, 2026

Chair Christopher Watt and Members of the Board of Trustees of Mendocino County Russian River Flood Control & Water Conservation Improvement District
P.O. Box 2104
Ukiah, CA 95482

VIA EMAIL: DistrictManager@rrfc.net

Re: ***Board of Trustees Meeting of Monday, July 6, 2026 at 5:30PM***
Agenda Item 10: Redwood Valley Annexation

Dear Chair Watt and Board of Trustees:

This office represents Lee Howard and Jim Ronco, residents and interested parties in the proposed annexation and tax sharing agreement, identified as Agenda item 10 for your meeting of July 6, 2026.

Please include this letter in the administrative record of proceedings for July 6, 2026 and any future proceedings related to the annexation and/or tax sharing agreement.

For reasons set forth below, our clients oppose the approval of Resolution #26-04.

Procedural posture of the annexation application:

Currently, the District's (hereinafter "RRFC" or "the District") application to annex the Redwood Valley County Water District's boundaries "not already within RRFC's boundaries" is **incomplete**, due to our legal challenge of your environmental review. The substance of the legal challenge is that no portion of Redwood Valley has ever been annexed into the District, and CEQA has not been followed, insofar as the District's negative declaration is defective.

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

The proposed negative declaration fails to acknowledge, or even recognize, the significant and unmitigated adverse environmental impacts (as defined by the CEQA guidelines) that the proposed project will cause. The California Environmental Quality Act (CEQA) requires the preparation of a full and complete Environmental Impact Report both to identify the myriad of adverse impacts and to identify and quantify the magnitude and the actual costs of the necessary mitigation measures for this project, and who will bear the significant financial burdens of mitigations for this project. This is to be accomplished before the application can be considered on its full merits, and to enter a tax share agreement while environmental review has not occurred stands the CEQA process on its head.

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 RRFC boundaries. 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" the EIR because it failed to address the adverse impacts of a project on agricultural lands and production in the Ukiah Valley.

RRFC 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 RRFC to future developments within Redwood Valley that will be facilitated by the conversion of ag water to permanent residential consumptive uses.

Recent District meetings:

In the last several weeks, various board members and General Manager Salomone have met with customers of the District at private locations, and have discussed various aspects of water use and distribution inside and outside of District boundaries. The lack of transparency arising from these impromptu meetings, arising from the inability to discern their purpose, when considered against the backdrop of the annexation application being procedurally defective due to the issues described above creates both an appearance of impropriety and a question regarding potential communications between the District and private customers, about with the public has the right to know. While the Brown Act not have technically been violated, the spirit of public transparency has not been met, and should be required before any further steps toward annexation, including the tax share agreement, go forward.

Please provide any and all future notices, agendas, minutes and other public documents, pertaining to the annexation application, CEQA process and/or tax share agreement to the undersigned.

Thank you for your attention to these matters.

Very truly yours,

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cc. clients, Mendocino County Board of Supervisors, Uma Hinman-LAFCo, Lilliana Selke, Redwood Valley Water District