

ATTACHMENT D



**OFFICERS**  
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GAIL HOFFMAN, Secretary  
SUMMERS Engineering, Engineer

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TONY LEWIS, Kingsburg  
RAY MOLES, Caruthers

November 11, 2019

Mr. David Fey  
Executive Director  
Fresno LAFCo  
2607 Fresno Street  
Fresno, CA 93721  
Email: dfey@co.fresno.ca.us

Received

NOV 18 2019  
Fresno LAFCo

Re: Opposition Tranquillity Resource Conservation District Overlapping  
Consolidated Irrigation District

Dear Mr. Fey:

I am the General Manager of the Consolidated Irrigation District ("CID"). CID, the City of Selma and Fresno County entered into memoranda of understanding to form the Central Kings GSA, which has drafted and will be submitting a groundwater sustainability plan ("GSP") in compliance with the Sustainable Groundwater Management Act ("SGMA"). As you are aware, CID and the Central Kings GSA are adamantly opposed to the expansion of the Tranquillity Resources Conservation District ("Tranquillity RCD") overlapping with CID's or the Central Kings GSA's service areas.

We are aware of the powers of a resource conservation district, as provided in the California Public Resources Code. CID, as a California irrigation district, and the Central Kings GSA, already provide or have the power to provide these resource conservation district services within their boundaries. There is no need for the overlap of an additional agency to further assess the landowners for services already provided to them by CID and the Central Kings GSA. CID and the Central Kings GSA are managing the surface water and recharging the groundwater aquifer within their service areas for the benefit of the landowners, the groundwater users and the Kings Subbasin. Furthermore, they are working on purchasing additional properties for the purpose of recharging more floodwaters for the benefit of the groundwater aquifer.

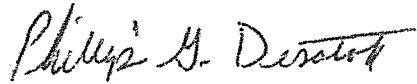
CID believes that the expansion of Tranquillity RCD is an attempt to attack CID's existing water rights and impede on the groundwater recharge projects that CID has implemented for the benefit of its landowners and in furtherance of reaching sustainability under SGMA. The approval of the expansion of Tranquillity RCD would be a detriment to the landowners within the service area of CID and the Central Kings GSA, because they would be subject to additional assessments and possible taxation for services already provided to them.

The Cortese-Knox-Hertzberg Act, at Government Code section 56061, defines "overlap" or "overlapping territory" as territory which is included within the boundaries of two or more districts or within one or more districts and a city or cities. The Tranquillity RCD's proposal to expand its boundaries would overlap with CID and the Central Kings GSA. CID and the Central Kings GSA already can or do provide the services that a resource conservation district would provide. As such, any overlap would be duplicative and unnecessary. Furthermore, CID and the Central Kings GSA specifically object to such an overlap.

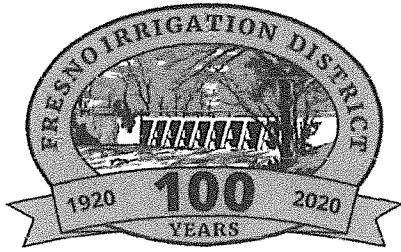
CID and Central Kings GSA request notices of all items that come before the Fresno Local Agency Commission relating to Tranquillity RCD. Furthermore, CID and the Central Kings GSA formally object to the expansion of the Tranquillity RCD overlapping CID's the Central Kings GSA's boundaries.

If you have any questions, please do not hesitate to contact me at (559) 896-1660.

Very truly yours,

A handwritten signature in cursive script that reads "Phillip G. Desatoff".

Phillip G. Desatoff  
General Manager  
Consolidated Irrigation District



2907 S. MAPLE AVENUE  
FRESNO, CALIFORNIA 93725-2208  
TELEPHONE: (559) 233-7161  
FAX: (559) 233-8227

A Century of Commitment, Conveyance & Customer Service

October 9, 2020

Mr. Juan Lara  
Fresno Local Agency Formation Commission  
2607 Fresno Street, Suite B  
Fresno, CA 93721

RE: Sierra Resource Conservation District Annexation, AD-19-3

Dear Mr. Lara:

The Fresno Irrigation District (FID) has reviewed the Sierra Resource Conservation District (RCD) Annexation AD-19-3 for which the District proposes annexation of approximately 165,000 acres to the Sierra Resource Conservation District. The proposed annexation would overlap with a large portion of FID's service area. While FID remains willing to discuss the proposal with Fresno LAFCo and Sierra RCD, FID strongly opposes and objects to the proposed annexation at this time. FID has the following comments:

1. A portion of FID is located within the proposed annexation area and owns, operates, and maintains many facilities located within the proposed annexation area, as shown on the attached FID exhibit map.
2. In recent years, FID, the cities and communities within FID, and the County of Fresno have formed the North Kings Groundwater Sustainability Agency (NKGSA) to comply with the Sustainable Groundwater Management Act (SGMA) and adopted its Groundwater Sustainability Plan for implementation of SGMA. Thus an additional layer and overlap of governance has already been created.
3. FID does not see a benefit or need to create another layer of governance and bureaucracy over its service area. Clearly there is no need for the overlap of an additional agency where FID and the NKGSA already serves.

G:\Agencies\LAFCO\Annexation\AD-19-3rev.doc

4. The Kings River Conservation District (KRCD) already serves the rural areas of FID's service area and FID is currently working with KRCD to evaluate the potential benefits and options of expanding their role within the FID service area.
5. As previously noted, while FID is willing to discuss the proposal with LAFCo and the proponents, FID strongly opposes and objects to the proposed annexation at this time.
6. FID respectfully requests that the comment period for the proposed annexation be extended for at least 30 days.

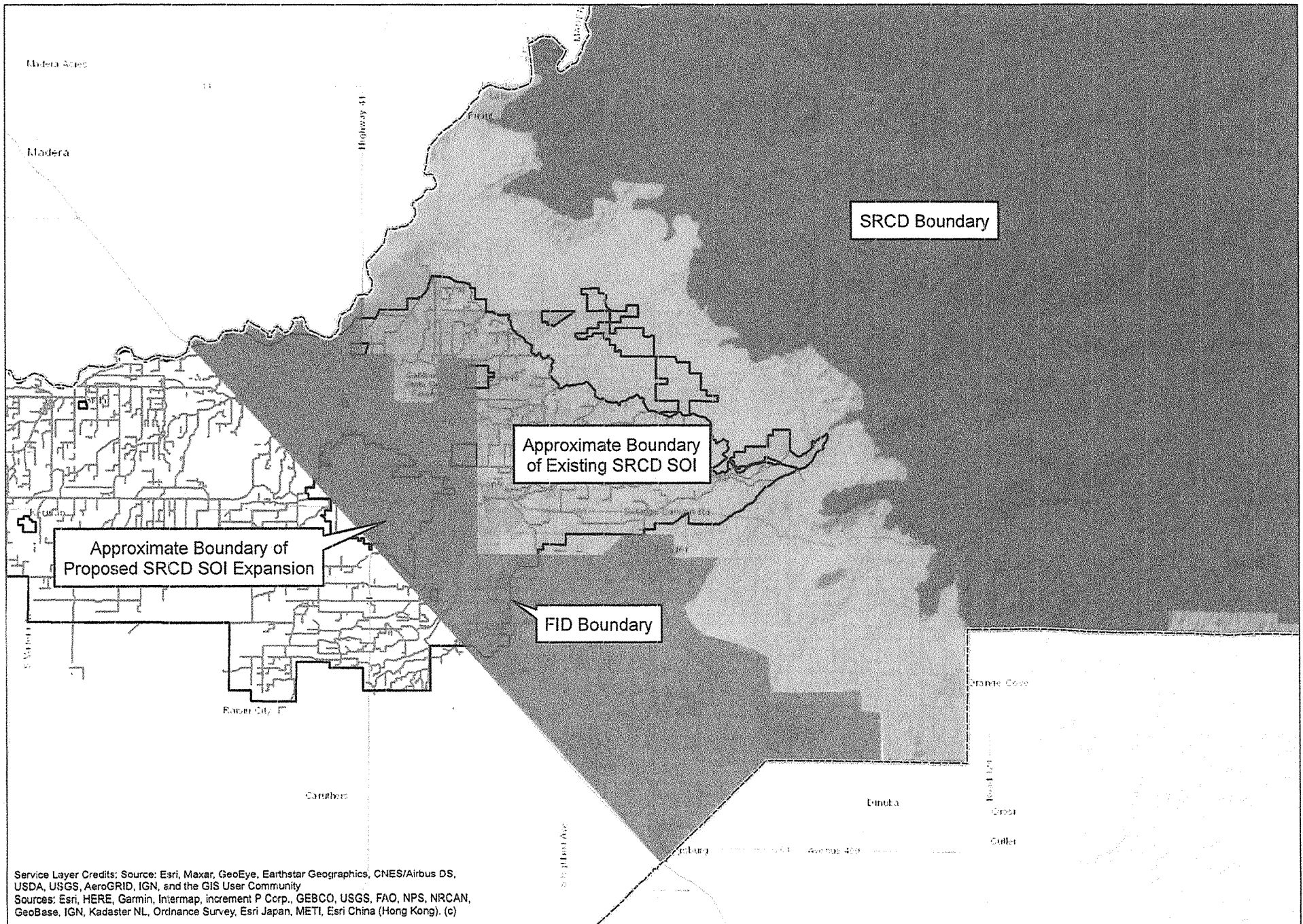
Thank you for submitting the proposed annexation for our review. We appreciate the opportunity to review and comment on the subject documents for this annexation. If you have any questions, please feel free to contact me at (559) 233-7161 extension 7103 or LKimura@fresnoirrigation.com.

Sincerely,



Laurence Kimura, P.E.  
Chief Engineer

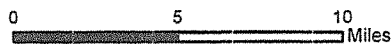
Attachment



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community  
 Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c)

Document Path: G:\Agencies\LAFCO\Annexation\AD-19-3 SRCD Exhibit.mxd

- Fresno County
- FID Boundary
- Proposed SOI Expansion
- FID\_Facilities
- Existing SRCD Boundary/ SOI



## SRCD Resolution 04-2019 Proposed Increase in Sphere of Influence



# Fresno Local Agency Formation Commission

## REORGANIZATION APPLICATION REQUEST FOR COMMENTS

Project Manager-Juan Lara, LAFCo Analyst II

Distribution Date: October 2, 2020

### PLEASE ROUTE TO:

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Irrigation District                        | <input checked="" type="checkbox"/> West Fresno County Red Scale Protective District |
| <input checked="" type="checkbox"/> Fresno Metropolitan Flood Control District | <input checked="" type="checkbox"/> Office of Transportation                         |
| <input checked="" type="checkbox"/> Affected School District                   | <input checked="" type="checkbox"/> Affected Mosquito Abatement District             |
| <input checked="" type="checkbox"/> Cal Trans                                  | <input checked="" type="checkbox"/> Affected Conservation District                   |
| <input checked="" type="checkbox"/> County of Fresno Development               | <input checked="" type="checkbox"/> Natural Resource Conservation Service            |
| <input checked="" type="checkbox"/> Fresno County Environmental Health         | <input checked="" type="checkbox"/> Regional Water Control Board                     |
| <input checked="" type="checkbox"/> Fresno County Office of Education          | <input checked="" type="checkbox"/> State Water Resource Control Board               |
| <input checked="" type="checkbox"/> Committee on School District Organization  | <input checked="" type="checkbox"/> Bureau of Reclamation                            |
| <input checked="" type="checkbox"/> State Center Community College             | <input checked="" type="checkbox"/> Assessor's Office                                |
| <input checked="" type="checkbox"/> Kings River Conservation District          | <input checked="" type="checkbox"/> Fresno County Elections Division                 |
| <input checked="" type="checkbox"/> Fresno County Fire Protection District     | <input checked="" type="checkbox"/> Affected Memorial District                       |
| <input checked="" type="checkbox"/> LAFCo Counsel                              | <input checked="" type="checkbox"/> Affected Cemetery District                       |
| <input checked="" type="checkbox"/> Sheriff's Department                       | <input checked="" type="checkbox"/> Other  |
| <input checked="" type="checkbox"/> Fresno County Library                      |  |

Application Name: Sierra Resource Conservation District Application No: AD-19-3

Location: Please view attached Application and map

APN(s): Please view attached Application and Map

Applicant: Sierra Resource Conservation District City/District: Sierra Resource Conservation District State: CA Zip:

Project Description: Annexation of approximately 165,000 +/- acres to the Sierra Resource Conservation District.

The attached information is circulated for your comments. Please attach your comments and recommendations in condition form and return to the project manager by October 12, 2020

Please check one below:

- No Comments       Comments Attached       Comments e-mailed or saved on: \_\_\_\_\_

RECOMMENDED CONDITIONS: Please draft conditions in final form that are acceptable to your department. They must be legible. Please phrase positively and clearly.

Reviewed By (please sign) \_\_\_\_\_

Please return to:  
 Juan Lara, LAFCo Analyst II  
 LAFCo Office  
 2607 Fresno Street, Suite B, Fresno, CA 93721



**Fresno Local Agency Formation Commission  
Change of Organization/Reorganization Application**

Not for use with update/revision to sphere of influence, city incorporation, or district formation.  
Contact LAFCo staff for details.

Type of local agency: (check one)

- City /  Special District /  Other

Requested Commission action: (check *all* that apply)

- Annexation of territory to a local agency.  
 Detachment of territory from local agency  
 Other Click or tap here to enter text.(describe in detail in application)  
 Request to extend services outside city limit (or special district service area) or sphere of influence  
*(complete first page of this application only; refer to extension of services worksheet at  
[G:\LAFCo Projects\Districts\56133 generic\Fresno LAFCo Extension of Service Worksheet 072415.docx](#))*

Application by (check one):  City/District Resolution  Landowner/Registered Voter Petition

Name of Proposal: (Name to match the title of map and legal description)

Annexation of all unserved areas northeast of Highway 99 in Fresno County adjoining existing District Boundary

List the name and address of officers or persons, not to exceed three in number, who are to receive the notice of hearing and the Executive Officer's Report:

| Name              | Mailing Address          | Phone Number   | Email  |
|-------------------|--------------------------|----------------|--|
| Pete Lassotovitch | PO Box 693 Auberry 93602 | (559) 285-4329 | <a href="mailto:plassotovitch@sierrarc.com">plassotovitch@sierrarc.com</a> |
| Alan Fry          | Same                     | (559) 259-1936 | <a href="mailto:afry@sierrarc.com">afry@sierrarc.com</a>                   |
| Ted Kimbler       | Same                     | (559) 349-4308 | <a href="mailto:tkimble@sierrarc.com">tkimble@sierrarc.com</a>             |

*This application and attached documents are complete and are in all respects true and correct to the best of my knowledge.*

*7/24/2019*

Signature of Chief Petitioner, Proponent, or  
Local Agency Representative

Date

Print name: Steve Haze Title: District Manager

Address: PO Box 693 Auberry, CA 93602

Phone: (559) 855-5840 970-6320 Fax: Click or tap here to enter text. Email: [shaze@sierrarc.com](mailto:shaze@sierrarc.com)

**Note:** Per the City/County Memoranda of Understanding, if this is an application for annexation to a city. A city shall, at least thirty days prior to filing any annexation proposal with the Fresno Local Agency Formation Commission, notify the County of its intention to file such proposal and the date upon which city expects

such proposal to be filed. *The County's affirmative response to the Notice of Intent is an essential part of a complete application to LAFCo.*

**1. PROPOSAL INFORMATION**

Record owner(s) of the affected territory (attach additional sheets as necessary):

Name Mailing Address

Click or tap here to enter text.

Number of registered voters in affected territory: Click or tap here to enter text.

Is a confirmation letter from County Elections Department attached?

Yes  / No

Number of residents in affected territory: Click or tap here to enter text.

Number of landowners in affected territory: Click or tap here to enter text.

Current population estimate in affected territory: Click or tap here to enter text.

Estimate of future population in affected territory: Click or tap here to enter text.

Total current assessed value of affected territory: Click or tap here to enter text.

Existing land use(s) of affected territory: Click or tap here to enter text.

Describe the land uses surrounding the proposal territory (e.g., residential, commercial, agricultural, industrial, open space, etc.).

North: Click or tap here to enter text. East: Click or tap here to enter text.

South: Click or tap here to enter text. West: Click or tap here to enter text.

City General plan designation(s) of affected territory: Click or tap here to enter text.

Proposed zoning designation(s) of affected territory: Click or tap here to enter text.

Acreage of proposal, including full unincorporated public rights-of-way: Click or tap here to enter text.

Assessor's Parcel Numbers (use full number including "S," "T," "U," etc.; note if parcel(s) includes a "LCC" (Williamson Act) designation):

Click or tap here to enter text.

Has mailed notice been sent to each affected agency, the county committee on school district organization, and each school superintendent whose school district overlies the affected territory in accordance with Gov.



Sec. Code 56658(b)(1)? Note: If notice has been sent, application processing may be expedited by approximately 20 days.

Yes (attach notice, affidavit of service and mailing list) /  No

Is any of the affected territory subject to an agricultural preserve or under Land Conservation Contract?

Yes /  No

If yes, has a notice of non-renewal been filed for the affected territory?

Yes (attach proof) /  No

Did the affected city adopt a resolution protesting the Land Conservation Contract when it was approved?

Yes (attach copy of resolution) /  No

If submitting an application by resolution: does the City/District's resolution of initiation include a statement that the city intends to either succeed or not to succeed to the contract?

Yes  (attach proof) / No

If application by resolution: attach certified copy of rezoning ordinance approved by City Council, aged no more than 12 months from date of this application. N/A

Attach evidence that a Right-to-Farm covenant has or will be made a requirement by the lead agency prior to consideration by the commission. N/A

Attach Service Plan Work Sheet required by GC sec. 56653) N/A : not needed if your city has submitted a Master Service Plan in the last 12 months.

Attach statement from the retail water purveyor that affirms that water supplies will be adequate and available for the proposal's domestic and fire flow needs.

Attach these maps necessary to this application:

Legal description and map (FYI: will be verified by County Assessor staff)

Location map

Vicinity map

Water and sewer maps ( N/A if included in service plan)

(Pre)Zoning Map

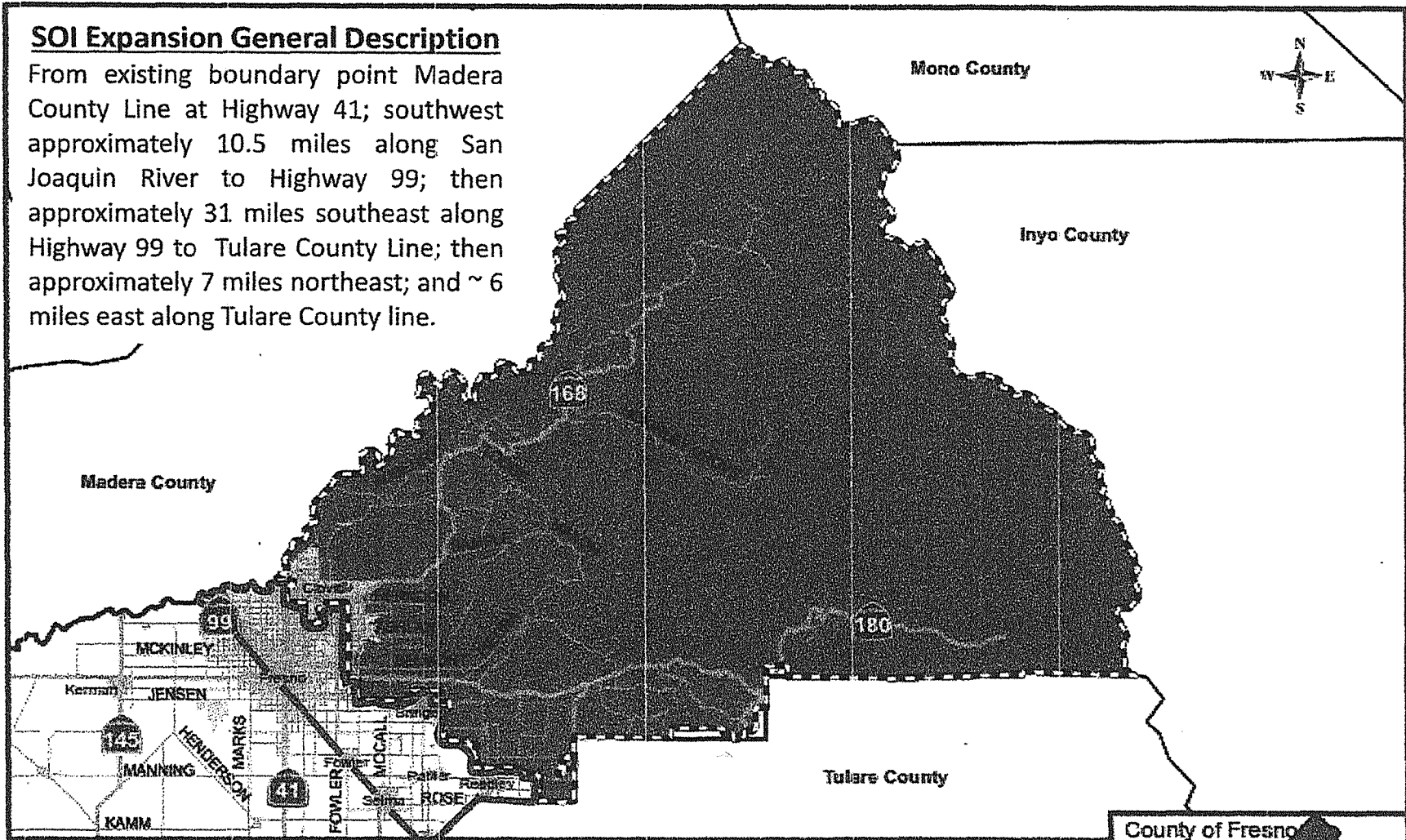
# Sierra Resource Conservation District

Authorized services: studies on preservation of natural resources

Exhibit A



## SOI Expansion General Description

From existing boundary point Madera County Line at Highway 41; southwest approximately 10.5 miles along San Joaquin River to Highway 99; then approximately 31 miles southeast along Highway 99 to Tulare County Line; then approximately 7 miles northeast; and ~ 6 miles east along Tulare County line.



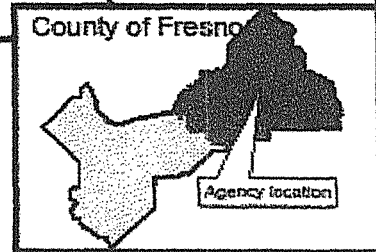
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### Fresno Local Agency Formation Commission

-  District SOI
-  District Service Area

Formation: 1956  
 Sphere updated: 02/19/2016  
 District area: 1,847,337 acres  
 Sphere area: 1,847,337 acres

Map prepared: 10/13/2017



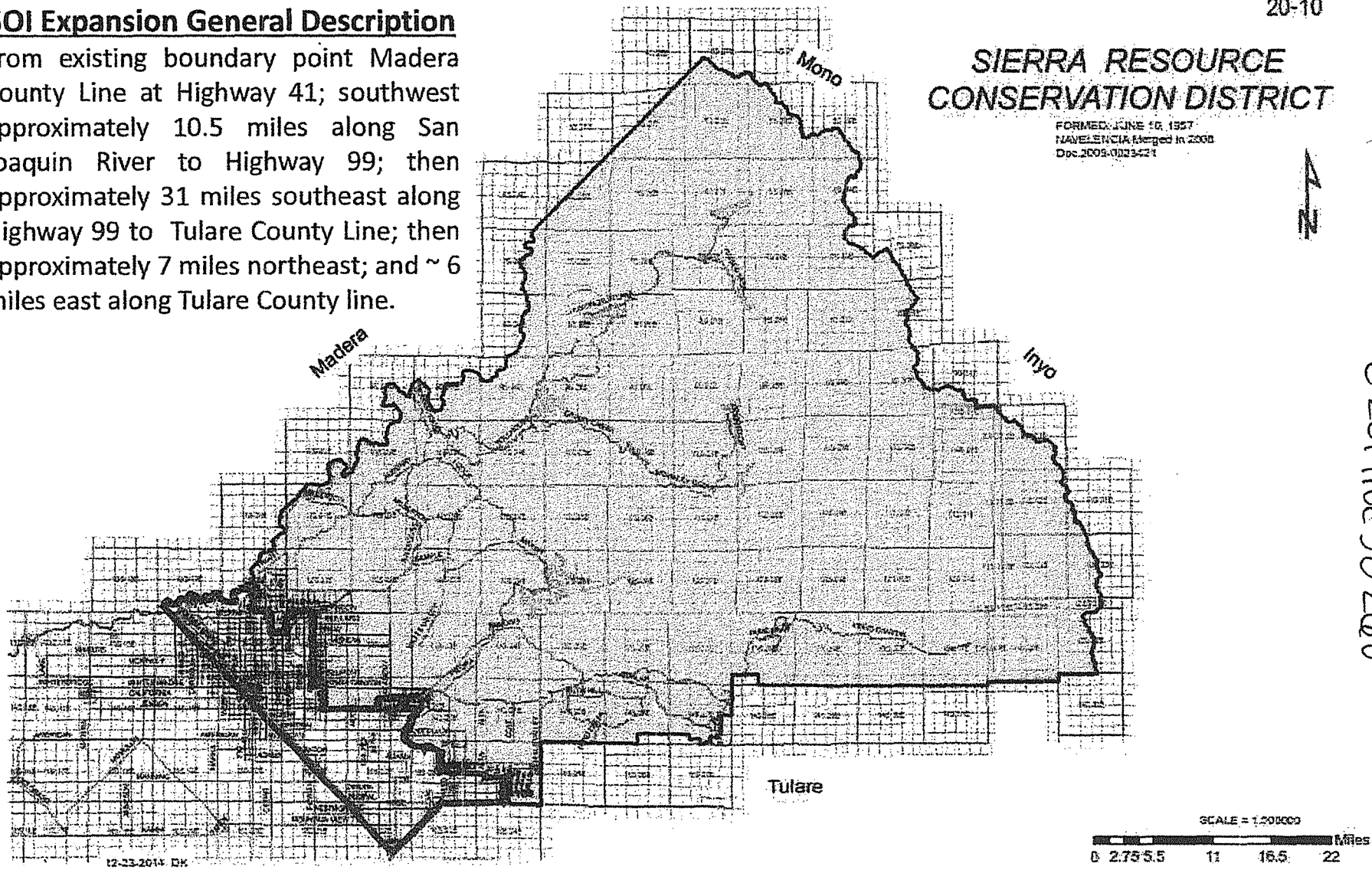
# SRCD – Resolution 04-2019

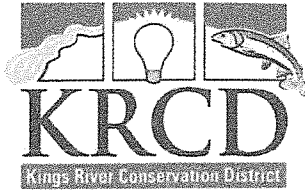
## Exhibit A – Increase in Sphere of Influence

20-10

### SOI Expansion General Description

From existing boundary point Madera County Line at Highway 41; southwest approximately 10.5 miles along San Joaquin River to Highway 99; then approximately 31 miles southeast along Highway 99 to Tulare County Line; then approximately 7 miles northeast; and ~ 6 miles east along Tulare County line.





4886 East Jensen Avenue  
Fresno, California 93725

Tel: 559.237.5567  
Fax: 559.237.5560

www.krcdd.org  
@kingsrivercd

October 23, 2020

Mr. David Fey, AICP  
Executive Officer  
Fresno Local Agency Formation Commission  
2607 Fresno Street, Suite B  
Fresno, CA 93721

Re: Sierra Resource Conservation District's Fresno Local Agency Formation Commission Change of Organization/Reorganization Application.

Dear Mr. Fey:

We reviewed Sierra Resource Conservation District's (SRCD) "Fresno Local Agency Formation Commission Change of Organization/Reorganization Application." The application indicates:

1. A desire by SRCD to annex all unserved areas northeast of Highway 99 in Fresno County adjoining existing District Boundary.
2. Provide resource conservation support to unserved portions within Fresno County northeast of Highway 99.
3. The reasons for this proposed increased Sphere of Influence and Annexation are as follows: the Sierra Resource Conservation desires to serve communities and rural areas that are not currently being served and represented in the conservation of important natural resources, while providing technical assistance, funding, services, education and/or information that can protect and enhance the natural resources for the benefit of those communities and rural areas.

Furthermore, the following are noted in SRCD's 2015-2020 Long Range Plan:

1. As of 1992, the primary purposes of the Resource Conservation District under Section 9001 (a) is to secure "the adoption of conservation practices including but not limited to farm, range, open space, urban development, wildlife, recreation, watershed, water quality, and woodland; to save the basic resources, soil, water, and air of the state from unreasonable and economically preventable waste and destruction."
2. Agencies at all levels of government have responsibilities to provide expertise and to otherwise assist and cooperate with the RCD on natural resource projects. This is strengthened by additional inter-agency Memorandums of Understanding [MOU]. The RCD is to provide local input and leadership and foster interagency cooperation and coordination on natural resource projects on both public and private lands.
3. SRCD's mission and function is to take available technical, financial, and educational resources whatever their source and focus or coordinate them at the local level to meet the present and future natural resource needs of the local land user.

**BOARD OF DIRECTORS**

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D. PAUL STANFIELD, President · GREGORY BEBERIAN, Vice President · PAUL PESCHEL, General Manager · Secretary · BRIANTREVARROW, Auditor

4. SRCD maintains working relationships with Federal, State and County Agencies and Departments, non-profit organizations, educational institutions which have natural resource duties and responsibilities under law, and with public and private landowners to save the basic resources, soil, water, and air of the state from unreasonable and economically preventable waste and destruction.
5. Most effective conservation practices will involve both the public and private land ownerships. The SRCD can and does act as a liaison between the private landowner and a multitude of land use programs to meet natural resource objectives.
6. Groundwater issues are a recurring theme on private lands within the RCD, and are specifically addressed in the Fresno County General Plan.
7. Canals and irrigation districts on the valley floor provide agricultural water during the dry summer months. Their boundaries and practices can affect the SRCD conservation efforts.
8. Information on individual and community wells, County Service Area (CSA's for community water systems), waste water treatment is available from the Fresno County Environmental Health Department, and the Fresno County Community Development Department.
9. Groundwater and recharge capabilities of land on the Valley floor and the foothills are an important concern addressed in the Fresno County General Plan. Specifically discussed are the increased pressure on water resources and diminishing capacity for recharge caused by conversion of agricultural and rangeland to other uses.

The Kings River Conservation District (KRCD) and our constituents encourage collaboration and adding value to water resource efforts. The aforementioned 2015-2020 Long Range Plan appears to focus on those same goals. Nonetheless, there are concerns boundaries could be overstepped, resulting in an overlap of authority and conflicts. This concern is heightened with the Sustainable Groundwater Management Act's (SGMA) requirements to mitigate undesirable results.

With the above in mind, we present the following comments and points for consideration:

1. Although the intent of LAFCo is to ensure that any functions of RCDs are additive and not duplicative, that they add value, and that no overlap in authorities occurs, RCD authorities are very broad, so restricting authorities would be difficult. Thus, if an RCD leverages an authority that another entity has concerns with, and if the RCD's boundary overlap's the other entity's boundary, the recourse is to take action through LAFCo.
2. RCD's are not restricted to working within their boundary. In that regard, RCD's may partner with another body, through agreement, eliminating the need to expand the boundary. Similarly, where an RCD works within another RCD's boundary, an MOU is required along with LAFCo approval. Where an RCD works within their own boundary and that boundary overlaps another entity's boundary, excepting another RCD, although an MOU is recommended it is not required. This is where

*October 23, 2020*

*Page 3*

the concern lies, as agencies would need to be reactive through LAFCo if an expansion of territory is allowed and authority conflicts arise.

3. Sierra RCD and other RCD's have previously worked outside their boundaries. This is alluded to in SRCD's 2015-2020 Long Range Plan, which references the use of MOU's. Thus, there are proven successes with the status quo.
4. Thus, KRCD's recommendation is to not allow expansion of SRCD's territory. To ensure collaboration and added value, we will work with SRCD to develop an MOU with respect to efforts that benefit KRCD and KRCD's constituents outside of SRCD's current territory or where boundaries overlap. If an expansion of SRCD's territory is allowed, we ask that a binding agreement/MOU be required by LAFCo to help ensure added value and no overlapping of authorities.

Thank you for the opportunity to comment on this application. Please contact me if you have any questions or concerns.

Sincerely,



Paul G. Peschel, P.E.  
General Manager

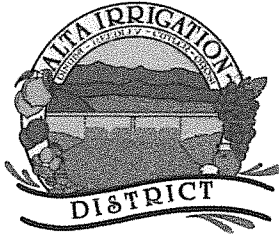
PP/cm

cc: Juan Lara and George Uc (via email)

L20-0083

File: 300.05.04.03

300.69



289 North L Street  
Dinuba, CA 93618  
Tel: (559) 591-0800  
Fax: (559) 591-5190  
[www.aitaid.org](http://www.aitaid.org)

October 9, 2020

*Sent Via E-mail*

Mr. Juan Lara, Fresno LAFCo Analyst II  
Project Manager  
2607 Fresno Street, Suite B  
Fresno, CA 93721  
Email: [jlara@fresnocountyca.us](mailto:jlara@fresnocountyca.us) <Name>

Subject: Opposition to Application No. AD-19-3 – Proposed Annexation of <Purpose of  
Approximately 165,000 Acres by Sierra Resource Conservation District

Dear Mr. Lara:

I am the General Manager of the Alta Irrigation District (“Alta ID”). Alta ID encompasses approximately 129,000 acres, in Fresno, Tulare, and a portion of Kings Counties. Alta ID operates 250 miles of open canals and 75 miles of pipeline to deliver water to its growers and water users. We also serve our landowners by providing groundwater and recharge management in compliance with the Sustainable Groundwater Management Act (“SGMA”). Pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (the “Act”), Sierra Resource Conservation District (“Sierra RCD”) has submitted a reorganization application (Application No. AD-19-3) to Fresno LAFCo proposing to annex approximately 165,000 acres in Fresno County. The proposed annexation would overlap with a portion of Alta ID’s territory. While Alta ID remains willing to discuss the proposal with Fresno LAFCo and Sierra RCD, **Alta ID strongly opposes and objects to the proposed annexation at this time.**

We have reviewed the application and are aware of the powers of a resource conservation district under California Public Resources Code. Resource conservation districts are authorized, among other things, to “[e]nsure consistency with the authorities and policies of the United States, this state, counties, cities, public districts, other resource conservation districts, persons, associations, and corporations.”<sup>1</sup> As part of its application, Sierra RCD describes the project as annexation of “all *unserved* ... areas” in the proposed expansion of its

<sup>1</sup> Pub. Res. Code § 9001(b)(1).

..

Board of Directors  
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Jerry Halford  
John Kalendar  
Tom Marshall  
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Larry Tout

Administration  
Chad B. Wegley  
*General Manager/  
Secretary*

Marc A. Limas  
*Operations  
Manager/Treasurer*

sphere of influence.<sup>2</sup> Sierra RCD further “desires to serve communities an rural areas that are *not currently being served and represented*” for conservation of natural resources, which presumably includes surface water and groundwater. Sierra RCD indicates that it only seeks expansion of territory that is inhabited.<sup>3</sup>

Alta ID, along with Fresno and Tulare Counties and several other municipalities and special districts, successfully passed special act legislation that created the Kings River East Groundwater Sustainability Agency (“KREGSA”). KREGSA is a special act district created for the purpose of being a GSA and complying with SGMA in the Kings Subbasin, within its boundaries. In December 2019, the KREGSA adopted its Groundwater Sustainability Plan (“GSP”) for implementation of SGMA.

Given the facts, it is clear that no need exists for the overlap of an additional agency where Alta ID or the KREGSA already provides or has authority to provide resource conservation district services within its boundaries. The purposes of the Act are to encourage “planned, well-ordered, efficient urban development patterns with appropriate consideration of preserving open-space [and agricultural] lands ... and encourage the orderly formation and development of local agencies based upon local conditions and circumstances.”<sup>4</sup> Such overlap would be unnecessary and wasteful duplication of services to our landowners and water users. It would create disorder and a lack of efficiency, and potentially jeopardize efforts to manage surface water and groundwater recharge projects for compliance with SGMA. We simply do not see a benefit in creating another layer of governance and bureaucracy over its service area. Expansion over Alta ID’s service area would further subject our landowners to additional assessments and possible taxation for services already provided. Moreover, we believe measures taken within our service area already fulfill Sierra RCD’s mission to “meet the present and future natural resource needs” of our growers, and to “save the basic resources ... from unreasonable and economically preventable waste and destruction.” Our landowners and water users are already well served and represented.

To the extent the proposed territory expansion overlaps with our territory, Alta ID formally objects to the expansion of Sierra RCD into our service area. Such expansion does not enhance and is not rationally related to purpose of the Act. The approval of the expansion would be a detriment to our landowners and water users. Additionally, we are currently working with the Kings River Conservation District (“KRCD”) to evaluate the potential benefits and options of expanding their role within our service area, which would not require the expansion of KRCD itself.

---

<sup>2</sup> Notice of Exemption filed with Fresno County Clerk on July 24, 2019.

<sup>3</sup> Sierra RCD Resolution No. 04-2019.

<sup>4</sup> See Sierra Club v. San Joaquin Local Agency Formation Com. (1999) 21 Cal.4th 489, 495.



Mr. Juan Lara, Fresno LAFCo Analyst II  
Subject: Opposition to Application No. AD-19-3 – Proposed Annexation of  
Approximately 165,000 Acres by Sierra Resource Conservation District  
October 9, 2020  
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Furthermore, we respectfully request that Fresno LAFCo extends the comment period for an additional thirty (30) days. If you have questions or would like additional comments, please contact me at (559) 591-0800 or by e-mail at [cw@altaid.org](mailto:cw@altaid.org).

Sincerely,

Alta Irrigation District



Chad Wegley,  
General Manager

c: File