



Solano Local Agency Formation Commission

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September 11, 2026

Cheryl Clower
Administrative Assistant
2025-2026 Solano County Civil Grand Jury
California Superior Court
600 Union Avenue
Fairfield, CA 94533
Office: 707-435-2575
cdclower@solano.courts.ca.gov

Dear Ms. Clower:

This letter is in response to Mr. Manuel Jr, 2025-2026 Solano County Civil Grand Jury request regarding Solano County Reclamation/Levee Districts.

Finding 1 – Lack of up-to-date required information could lead to the public’s inability to contact Reclamation District Personnel.

933.5(a)(2) *The respondent disagrees wholly or partially with the finding, in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.*

Solano LAFCO disagrees with the Finding on four points: (1) “required” information, (2) “contact” information, (3) “Reclamation District Personnel”, and (4) “lack of up-to-date” information. Each of these issues results in Solano LAFCO disagreeing with the Finding. The follow is a breakdown of each issue.

1. “Required” Information: The Solano County Civil Grand Jury has made a finding based on the premise that Solano LAFCO is “required” to obtain and provide contact information for Reclamation District Personnel. Solano LAFCO disputes this assumption on the grounds of a faulty premise – that LAFCOs are assigned such a “requirement”. LAFCO’s are not “required” to obtain and provide this information.
2. “Contact” information: The Finding specifically refers to “contact” information for Reclamation District Personnel. Solano LAFCO disputes this part of the finding because the Directory does provide an email and/or phone number contact for every reclamation district. Contact information is found in two locations in the Directory: (1) the opening pages titled “Alphabetical by Agency” list, and (2) on the individual profile pages within the Directory.

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3. “Reclamation District Personnel”: The Finding calls for “Reclamation District Personnel”; however, the Civil Grand Jury’s June 10, 2026, Report Section III Statement of Facts, commencing on page 4, calls out Board of Trustees information. The Board of Trustees is not “personnel,” and the missing “began serving/term expires,” and “meets” information pertains to governance. This does not speak to the ability to contact a district or personnel.
4. “Lack of up-to-date” information: The Finding states that the information is not up-to-date. Solano LAFCO disputes this claim because of the recent and ongoing efforts made to create and maintain the Directory.

The following further explains Solano LAFCO’s conclusions.

- Solano LAFCO’s powers and authority are limited to those defined in Government Code Section 56375.¹ The law does not include a requirement for LAFCOs to know or publish specific information, such as the “began serving” and “term expires” and “meets” of board of trustees.
- However, Government Code Section 53051² requires local agencies, including special districts, to update their Registry of Public Agencies document (previously known as the Statement of Facts - Roster of Public Agencies document), which must be filed with both the Secretary of State and the county clerk of each county where the agency operates an office.³ The information published within the Directory was the information provided to Solano LAFCO by the districts, the internet, and the County Clerk after hours of research and outreach.
- It is important to note, LAFCOs do not have police power or enforcement authority over the governance of a special district. Reclamation Districts are autonomous, independent local public districts governed by their own boards of trustees who exercise “general supervision and complete control over the construction, maintenance and operation of the reclamation works, and generally over the affairs of the district” (WAT 50652).⁴ Members of the board of trustees are either elected or appointed by the County Board of Supervisors from the district’s population (WAT 50650). It is the duty and responsibility of the individual reclamation district to provide and report up-to-date contact information, most commonly to the County Clerk of the Board.⁵
- In reference to municipal service reviews, LAFCOs are required to analyze available information, report on compliance with agency principal acts and relevant laws, and make recommendations to an agency for compliance.⁶ LAFCOs do not have power or authority over how special districts operate or to tell a special district how to govern.

¹ These powers, as related to special districts, are limited to the formation, consolidation, changes of organization or reorganization, or dissolution of special districts, and establishing and amending the sphere of influences for special districts. Cortese-Knox-Hertzberg, aka LAFCO Law, is Government Code Section 56000-57550

² https://leginfo.ca.gov/faces/codes_displaySection.xhtml?sectionNum=53051.&lawCode=GOV

³ <https://www.csga.net/blogs/vanessa-gonzales/2022/02/14/its-the-law-update-your-public-agency-registry>

⁴ California Water Code (WAT) Division 15 [50000 – 53901] governs Reclamation Districts

⁵ LAFCOs are not agencies that reclamation districts report to.

⁶ Government Code Section 56430

Recommendation 1 – LAFCO contact listed Reclamation District to complete and update required information in the directory in the website by November 1, 2026.

933.5(b)(4) *The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.*

The Recommendation imposes a requirement on Solano LAFCO where there is none in Cortese-Knox-Hertzberg. Solano LAFCO voluntarily chose to create the Directory as a resource document. Solano LAFCO staff endeavored to provide this service to the best of staff's ability based on obtainable and available information.

Solano LAFCO contends that the information obtained by staff in the Directory is as complete as possible based on all available information at the time. If the information was available, it was included in the Directory. The methodology Solano LAFCO staff used in obtaining all available information for the Directory was as follows:

- Staff's due diligence to contact all the agencies (50 in total) via email and phone over the course of 9 months (April 2025-December 2025).
- Staff researched district websites when available, CEQA.net⁷, Solano County's website records, 2020 Solano LAFCO MSR, and Suisun Reclamation District's General Manager.
- Contacted and coordinated with the Solano County Clerk of the Board for all up-to-date information on record.
- Continued and constant tracking of Solano County Board of Supervisors Agendas for actions related to the board of trustees of any special district. This has resulted in updates to information within the Directory related to RD 2136.

Despite the lack of a requirement, Solano LAFCO understands the Civil Grand Jury's concerns regarding "transparency, accountability, and basic public access to information across Solano County Reclamation Districts." Therefore, Solano LAFCO voluntarily chose to create one and make it publicly accessible. LAFCO staff is committed to maintaining and updating the Directory as information becomes available.

Sincerely,



Rich Seithel
Executive Officer

cc: The Honorable William J. Pendergast III, Presiding Judge
Superior Court of California
600 Union Ave
Fairfield, CA 94533

⁷ California Governor's Office of Land Use and Climate Innovation's public postings for environmental compliance.