

Sonoma Local Area Formation Commission – Opportunities Abound

SUMMARY

In October 2025, a discussion was held for the 2025-26 Sonoma County Civil Grand Jury (Grand Jury) to learn more about Sonoma County's independent Local Area Formation Commission (LAFCO). During the presentation, the Sonoma LAFCO Executive Officer (EO) announced his intention to retire. The Grand Jury considered this an ideal time to gain a broader understanding of the functions of Sonoma LAFCO and the EO roles and responsibilities.

The State of California created LAFCOs to encourage the orderly formation of local governmental agencies, preserve agricultural land resources and discourage urban sprawl. LAFCOs are responsible for coordinating logical and timely changes in local governmental boundaries; conducting special studies that review ways to reorganize, simplify, and streamline governmental structure; and prepare mandatory Sphere of Influence reporting for each city and special district within the county.

The Grand Jury began with a review of Sonoma LAFCO processes. The Grand Jury discovered some key policies hadn't been updated for more than a decade. Information on the website was not complete or well organized. Roles of staff members were poorly defined, and many mandatory reports were last updated more than ten years ago.

The Grand Jury compared the Sonoma LAFCO with other Northern California LAFCOs of similar complexity. The Grand Jury found that Sonoma LAFCO lacked clear, comprehensive reports and strategy documents that were prevalent among other California LAFCOs with similar budgets, staffing levels, and total number of cities and special districts.

Some requested evidence of mandatory reporting required under Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 (CKH) was not provided to the Grand Jury for review. Additionally, the Grand Jury learned that reports and studies that are mandated under the CKH were not being completed as frequently as required by the CKH and Sonoma LAFCO's own policy.

The Grand Jury learned that there are no written job descriptions specific to the Sonoma LAFCO EO and its staff. Job descriptions are a foundational tool for clarifying roles, ensuring legal compliance, and informing expectations. Lack of clear job descriptions leads to uncertainty, inconsistency and disorganization. Further, the EO and staff are employees of Sonoma County, which can give the appearance of a conflict of interest for an organization that is an independent entity.

The Grand Jury found that Sonoma LAFCO lacked a strategic plan. The Grand Jury is also concerned with the lack of any succession planning, especially considering the EO's announced intention to retire.

GLOSSARY

CALAFCO – California Association of Local Agency Formation Commissions

CKH – Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000

EO – Executive Officer

LAFCO – Local Agency Formation Commission

MSR – Municipal Service Review

SOI – Spheres of Influence

BACKGROUND

What are LAFCOs?

The following background information was condensed from the CALAFCO website for the purposes of brevity and focus of attention on areas of primary concern.

Local Agency Formation Commissions (LAFCOs) are local agencies formed by the California State legislature in 1963 to:

- Encourage the Orderly Formation of Local Governmental Agencies;
- Preserve Agricultural Land Resources; and
- Discourage Urban Sprawl.

Cortese-Knox-Hertzberg (CKH) Local Government Reorganization Act of 2000

The CKH was adopted in response to recommendations contained in a report from Growth Within Bounds, the Commission on Local Governance for the 21st Century. The CKH represents the most comprehensive overhaul of LAFCO legislation since the original adoption of the Knox-Nisbet Act in 1963. The CKH established the requirement that LAFCOs prepare Municipal Service Reviews to inform updates of local government's Spheres of Influences, which are to be reviewed at least every five years. See below for more information regarding the Spheres of Influence. For more information, [view the Cortese Knox Hertzberg Act here.](#)

LAFCO responsibilities:

- Coordinate logical and timely changes in local governmental boundaries;
- Conduct special studies that review ways to reorganize, simplify, and streamline governmental structure; and
- Prepare a Sphere of Influence for each city and special district within the county.

LAFCOs have authority over:

- Boundary Changes
- Sphere of Influence Studies

- Municipal Service Reviews
- Initiation of Special District Consolidations
- Out of Agency Service Agreements
- Adoption of Local Policies

Spheres of Influence (SOI)

The purpose of the Sphere of Influence study is to ensure the provision of efficient services while discouraging urban sprawl or the premature conversion of agricultural and open space lands. Defining the SOI of each government prevents overlapping jurisdictions and duplication of services. LAFCOs cannot tell agencies what their planning goals should be. Rather, on a regional level, LAFCOs coordinate the orderly development of a community through reconciling differences between agency plans so that the most efficient urban service arrangements are created for the benefit of area residents and property owners.

As part of the SOI update, the LAFCO must consider and prepare a written statement of its determinations which are summarized as follows:

1. The present and planned land uses in the area, including agricultural and open-space lands.
2. The present and probable need for public facilities and services in the area.
3. The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
4. The existence of any social or economic communities of interest in the area if the LAFCO determines that they are relevant to the agency.
5. For a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing Sphere of Influence.

Municipal Service Reviews (MSR)

Municipal Service Reviews (MSR) were added to LAFCO mandates with the passage of the CKH Act in 2000. An MSR is a comprehensive study designed to better inform LAFCO, local agencies, and the community about the provision of municipal services. MSRs attempt to capture and analyze information about the governance structures and efficiencies of service providers, and to identify opportunities for greater coordination and cooperation between providers. MSRs are a prerequisite to a Sphere of Influence determination and may also lead a LAFCO to take other actions under its authority.

Per the CKH Act, the LAFCO prepares written statements of its determinations with respect to each of the following factors:

1. Growth and population projections for the affected area.
2. The location and characteristics of any disadvantaged unincorporated communities within or contiguous to the SOI.
3. Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs or deficiencies.
4. Financial ability of agencies to provide services.
5. Status of, and opportunities for, shared facilities.
6. Accountability for community service needs, including governmental structure and operational efficiencies.
7. Any other matter related to effective or efficient service delivery, as required by commission policy.

LAFCO Composition

The composition of LAFCOs varies from county to county. Sonoma's LAFCO is composed of seven regular and four alternate members. Each member serves a four-year term. The regular members are:

- Two members elected by the City Selection Committee of the Sonoma County Mayors and Councilmembers' Association from among the nine cities' mayors and council members;
- Two members appointed by the Chair of the County Board of Supervisors from among their membership;
- Two members elected by the independent special districts from among the members of the boards of directors of the districts; and
- One member appointed by the LAFCO from the public.

For each category of regular members (city, county, special district, and public) there is one alternate. Alternate members may attend and participate in LAFCO meetings but may vote only when a regular member from the category they represent is absent or chooses not to vote.

LAFCO Funding

Each LAFCO adopts a budget annually after noticed public hearings. In counties where there is city and independent special district representation on the LAFCO, the county, cities, and independent special districts shall each provide a one-third share of the LAFCO's annual operational costs. Guidance for funding and apportioning fees is provided in CKH section 56381.

Sonoma LAFCO's budget includes revenue from the County of Sonoma and the cities and special districts within Sonoma County. Other funding includes fees for services, such as legal counsel fees, pre-application fees, and outside agency fees. The 2025-2026 budget is \$1,184,294. Staff is comprised of the EO, a Commission Analyst, and a Commission Clerk.

METHODOLOGY

This report is based on interviews with individuals who have a deep knowledge of local and other LAFCO operations, regulations and objectives. Additionally, Sonoma County LAFCO performance was analyzed based on available data. Internet research was performed, including comparison to a few other Northern California LAFCOs of similar complexity. Statutory LAFCO requirements were also reviewed.

The Grand Jury did not evaluate MSR and SOI content as part of this investigation.

DISCUSSION

Documents—Outdated and Missing

Sonoma LAFCO's MSR and SOI policies have not been updated in more than 12 years. Without regular review, updates and approval, these policies and procedures are likely to be outdated, incorrect, or incomplete.

Additionally, the Grand Jury found Sonoma LAFCO's retention and organization of records to be lacking. After receiving a list of MSRs and SOIs from Sonoma LAFCO, the Grand Jury selected several samples for review. The Grand Jury was referred to the website, and in several cases, was unable to locate the documents. After a follow-up request, Sonoma LAFCO was unable to provide all the documents.

Website—Inaccurate, Outdated and Lacks Transparency

Several areas of the Sonoma LAFCO website were found to be challenging to navigate, outdated, or contained errors or omissions. [View the Sonoma LAFCO Website here.](#)

Minutes from the Sonoma LAFCO meetings are not available on the website until the next meeting agenda is published, which can be a month or more after the meeting. The website does not currently provide a link for the public to participate in or view Sonoma LAFCO meetings online. Meeting recordings and transcripts are not made available to the public on the Sonoma LAFCO website.

Additionally, portions of the website are outdated. The Guide to Special Districts (Reports and Publications web page) is dated 2013. Pages 3 – 5 list the cities and special districts in Sonoma County. This list is outdated because of reorganizations or annexations which have occurred over the past decade. Further, the current budget published on the website did not correlate to the approved budget because of an omitted budget line item and amount.

Compared to similar LAFCO websites, Sonoma LAFCO's website lacked critical information for LAFCO members and the community. For example, Sonoma LAFCO lacked annual work plans, strategic objectives, meeting recordings and minutes that were easily accessible on similar LAFCO websites. The Grand Jury also found it difficult to locate important records on the Sonoma LAFCO website, such as MSRs and SOI studies, due to ineffective organization.

SOI and MSR - Risk of Non-Compliance

Sonoma LAFCO's policy states "The Commission will review all spheres of influences every five years for each governmental agency providing municipal services."

Elsewhere the policy states, "Spheres of influence are required to be updated every five (5) years and are amended as conditions warrant." This policy aligns with CKH section 56425(g) that states, "On or before January 1, 2008, and every five years thereafter, the commission shall, as necessary, review and update each sphere of influence."

The "as necessary" language of this code is interpreted by Sonoma LAFCO to justify performing SOIs and MSRs less frequently than every five years. The Grand Jury found that similar LAFCOs adhered to performing SOIs and MSRs at least every five years.

The Grand Jury was unable to verify Sonoma LAFCO's compliance with SOI policy. After repeated requests for examples of SOI studies, Sonoma LAFCO produced form letters dated 2010-2017, which contained questions that did not meet the SOI criteria as defined by the CKH. Moreover, Sonoma LAFCO failed to provide the replies from

Sonoma LAFCO members requesting changes, corrections or confirmation of their existing SOIs.

Furthermore, the Grand Jury is concerned that Sonoma LAFCO's policy and practice for preparing required MSR's is not compliant with statute and is not beneficial to LAFCO membership and the community. CKH section 56430(e) states, "In order to prepare and to update spheres of influence in accordance with Section 56425, the commission shall conduct a service review of the municipal services". Sonoma LAFCO includes this section in their policy but does not specify the frequency for updating MSR's.

In practice, the interval between MSR updates has frequently been well beyond five years. Based on information provided to the Grand Jury, at least 18 special district MSR's have not been updated in the last 20 years, and more than half of the city MSR's have not been updated in 19 years! In addition to potential statutory conflict, delayed MSR updates are a disservice to the community because MSR's help inform SOI and they provide information to the public on cities and special districts.

The Grand Jury requested but was not provided evidence to demonstrate that Sonoma County Counsel had reviewed and approved Sonoma LAFCO's interpretation of the CKH for their policy. Furthermore, permission was not granted to allow the Grand Jury to contact Sonoma LAFCO's counsel about this matter.

Comparison—Less Effective Than Other LAFCOs

The Grand Jury found budget and staffing for Sonoma LAFCO are in line with other Northern California LAFCOs similar in complexity. Sonoma LAFCO's budget exceeds some similar LAFCOs, but it has produced fewer MSR's. These similar LAFCOs routinely produce MSR's and SOIs every five years for applicable entities under their jurisdiction. Information on their website provides full transparency with easy navigation.

Sonoma LAFCO continues to rely on county services and supplies. Other LAFCOs have severed their county ties and benefit from their ability to source competitively priced services and supplies specialized for their purposes.

LAFCO Staffing—Who’s Doing What?

The Executive Officer (EO) and staff are Sonoma County employees. Being an employee of Sonoma County can give the appearance of a conflict of interest for an organization that is an independent entity.

Until July 1, 2024, the EO reported to the County Administrator (CAO) and performance was evaluated by the CAO. A new professional services agreement was negotiated and signed effective July 1, 2024. The EO is still an employee of Sonoma County but now reports to the Commission and performance is now evaluated by the Commission. This reporting structure is more appropriate for independence.

While there is more independence with this approach, the County’s employee overhead costs may be adding to the cost of Sonoma LAFCO operations. The Grand Jury found that similar LAFCOs have successfully transitioned away from reliance on county resources.

Sonoma LAFCO staff lack clear roles and responsibilities. When asked about job descriptions for staff positions, the Grand Jury was told that a job description is not maintained for the EO, and there are generic Sonoma County job descriptions for the other positions. The generic job descriptions lack defined responsibilities and expectations specific to Sonoma LAFCO which may cause an overlap or gap in assigned tasks. The Grand Jury learned, through interviews, that not all Sonoma LAFCO staff are not fully trained for their roles. This can result in errors and inefficiencies.

Leadership & Communication—What Are They Doing & Where Are They Going?

The responsibilities of LAFCO involve setting strategic goals, managing budgets, enacting policies, and acting as a liaison between commission members and the public. While the Grand Jury was able to review strategic plans, annual work plans, mission, vision and values for similar LAFCOs, comparable documents were unavailable for Sonoma LAFCO.

Although the EO has announced imminent plans to retire, Sonoma LAFCO does not have a succession plan in place. A succession plan is a best practice for managing the transition of leadership and providing growth opportunities for staff.

Prior to 2024, the EO reported to Sonoma County's CAO. With the renewed EO professional services agreement in 2024, the EO now reports to Sonoma LAFCO. The Grand Jury sees an opportunity for the Commissioners to take a stronger role in leading the organization. The changes recommended in this investigation will require the Commissioners to lead the way.

FINDINGS

- F1. No evidence was made available to the Grand Jury to confirm that counsel or the Sonoma LAFCO Commission reviewed the decision not to require Municipal Service Reviews every 5 years. Without a legal opinion or Commission approval, this practice may be non-compliant with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000.
- F2. Lack of published strategic planning documents inhibits a proactive approach to engagement with the Sonoma LAFCO cities and special districts. As a result, Sonoma LAFCO members and the community lack a clear vision of its goals.
- F3. The Sonoma LAFCO policy and procedure document provided to the Civil Grand Jury had not been updated in more than 12 years. Without periodic review and updates, the policies and procedures may not be keeping up with changing regulations or best practices.

- F4. Current Sonoma LAFCO policy does not require Municipal Service Reviews to be performed every five years. For some cities and special districts within Sonoma County, Municipal Service Reviews have not been performed in nearly 20 years. As a result, Sonoma LAFCO members are not receiving value for their required annual dues and the public is not provided timely analysis of cities and special districts.
- F5. Sonoma LAFCO is not performing Sphere of Influence updates every five years. As a result, Sonoma LAFCO may not be in compliance with their own policy and the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. Sonoma LAFCO members and the community are not receiving valuable information from updated Sphere of Influence studies.
- F6. Comparable LAFCOs with similar budget and staffing are producing MSRs and SOI studies every five years for applicable entities under their jurisdiction, demonstrating that Sonoma LAFCO should also be able to produce MSRs and SOI studies within the five-year timeframe set forth in the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000. Lacking MSR and SOI updates and appropriate transparency, Sonoma LAFCO is not meeting its responsibilities to the community.
- F7. There are no job descriptions specific to the Sonoma LAFCO Executive Officer and staff, raising concern for a lack of clear roles and responsibilities within Sonoma LAFCO, and, in some cases, appropriate training. This can result in errors and inefficiencies.
- F8. The Executive Officer and staff of Sonoma LAFCO are employees of Sonoma County, which could be perceived as creating a conflict of interest or a lack of independence.
- F9. Information on the Sonoma LAFCO website is not routinely maintained, is difficult to navigate, and does not provide timely updates on meeting outcomes. This prevents Sonoma County residents from accessing information related to Sonoma LAFCO.

F10. Sonoma LAFCO does not have a succession plan for the Executive Officer. Without a succession plan, transition in leadership can result in negative consequences.

RECOMMENDATIONS

Pursuant to Penal Code § 933.05, the Sonoma County Civil Grand Jury requires responses as follows:

- R1. The Grand Jury recommends the Commission obtain a legal opinion on the frequency and requirements of Municipal Service Reviews and Sphere of Influence studies necessary to be compliant with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 by 10/31/26.
- R2. The Grand Jury recommends the Commission review the existing policy for Municipal Service Reviews and Sphere of Influence updates and consider amending the policy to ensure compliance with the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 by 12/31/26.
- R3. The Grand Jury recommends the Commission direct the Executive Officer to create a strategic plan to execute Sphere of Influence updates and Municipal Service Reviews to comply with the legal opinion obtained per Recommendation 1 of this report. This plan should be presented to the Commission for consideration by 12/31/2026.
- R4. The Grand Jury recommends the Commission direct the Executive Officer to review and evaluate the staffing levels and budgets of other comparable LAFCOs to gain a better understanding of what can be accomplished within staffing and budgetary constraints and provide a written report with findings and recommendations to the Commission by 3/31/27.
- R5. The Grand Jury recommends the Commission direct the Executive Officer to evaluate Sonoma LAFCO's effectiveness by requesting performance review

feedback from member cities and special districts. Sonoma LAFCO should publish their findings and plan(s) of action by 3/31/27.

R6. The Grand Jury recommends the Commission direct the Executive Officer to create position descriptions that are specific to Sonoma LAFCO roles for Commission review by 10/1/26.

R7. The Commission should evaluate benefits vs. challenges of using the County of Sonoma for employment and other services to determine if costs are competitive and providing optimal results by 12/31/26.

R8. The Grand Jury recommends the Commission direct the Executive Officer to create a plan for website updates to improve the website's accessibility and ensure the website contains timely access to Commission meeting minutes and important records by 9/30/26 and implemented by 3/31/27.

R9. The Grand Jury recommends the Commission develop a succession plan that supports smooth transition of leadership. The succession plan should include, at minimum, the identification of skills needed for leadership, leadership tasks, the skills and knowledge of staff, and the appropriate interim delegation of leadership responsibilities by 9/30/26.

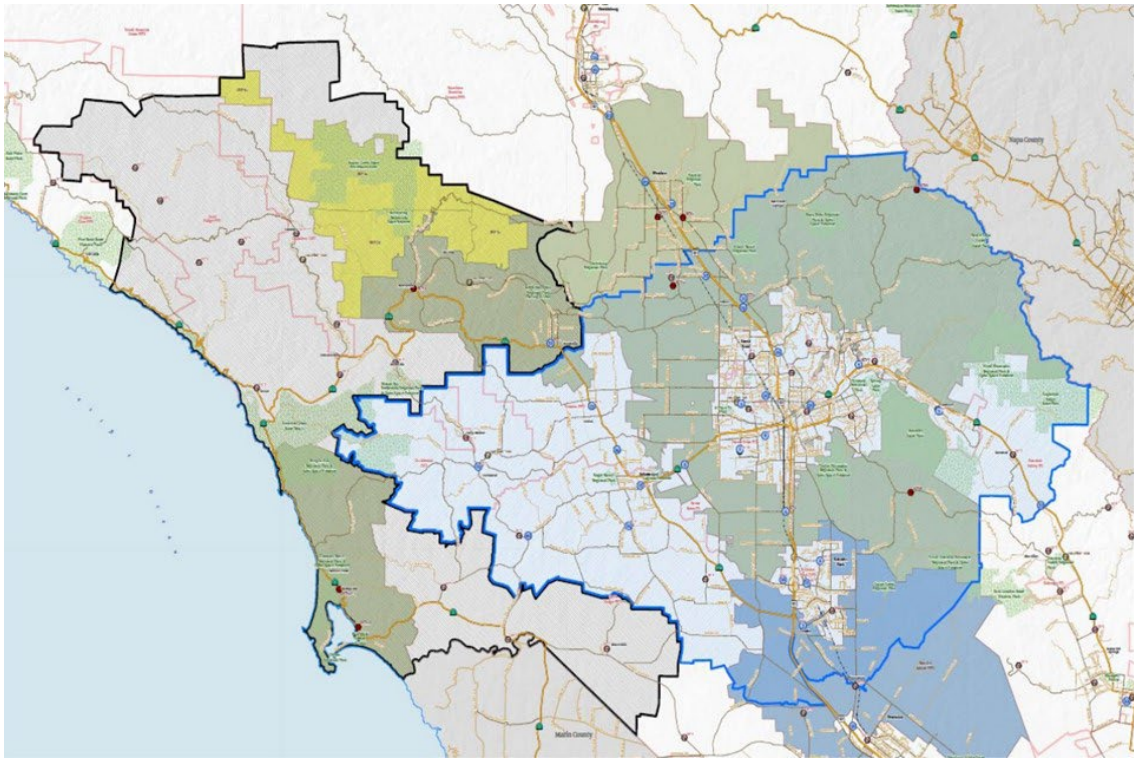
R10. The Grand Jury recommends the Commission direct the Executive Officer to identify staff training needs by 9/30/26 and implemented staff training by 3/31/27.

REQUIRED RESPONSES

The following response is required, pursuant to Penal Code section § 933.05:

From the following elected county officials within 90 days:

- Sonoma LAFCO Commissioner Members (F1 – F10, R1 – R10)



Reports issued by the Grand Jury do not identify individuals interviewed. Penal Code § 929 requires that reports of the Grand Jury not contain the name of any person or facts leading to the identity of any person who provides information to the Grand Jury.