

Rainbow Planning Group

Advising the Board of Supervisors ~ San Diego County

Mr. Michael D. Ott, Executive Officer
Local Agency Formation Commission
9335 Hazard Way, Suite 200
San Diego, CA 92123

RECEIVED
MAR 26 2015
SAN DIEGO LAFCO

CC: Honorable Bill Horn
San Diego County Board of Supervisors

RE: Proposed Fallbrook Public Utility District and Rainbow Municipal Water District Reorganization –
Reference Number RO/SA(a)(b)14-04; MSR/SR13-66

Gentlemen:

The Rainbow Community Planning Group (RCPG) has been monitoring the application filed by the Fallbrook Public Utility District (FPUD) to dissolve the Rainbow Municipal Water District (RMWD) and annex the territories of Rainbow into FPUD. The RCPG has a long history of working with the County to provide guidance on matters related to local governance in this area.

The RCPG fully supports the goal of both FPUD and RMWD to work together to streamline government and provide more efficient services to the ratepayers of the region. It is our understanding that both agencies agree on this matter as well and that the sticking point of the issue is related to governance.

The application filed by FPUD that is under consideration by the Local Agency Formation Commission (LAFCO) includes a governance model that includes a component of at-large elections where some percentage of the Board of Directors will be elected from the entire District which will span about 100 square miles if combined. In the current proposal, four seats will be elected by division, with three other seats being elected at-large. It is our understanding that LAFCO may be considering altering this to a 9 member Board with either three or four at-large seats.

The RCPG is opposed to any application of at-large elections for two reasons. First, we feel that the communities of Rainbow, Bonsall, and Fallbrook are very different from each other and have different interests on the water district board. These communities should be represented by individuals who are elected to serve the interests of these distinct areas. With an at-large component, certain geographical areas will be over-represented on the board and marginalize the interests of the others.

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Second, with such a large, diverse service area, the combined District will require a lot of political connections and money to effectively mount a campaign for one of the at-large seats. If the combined agency was divided into seven districts for elections without any at-large seats, each division would have under 7500 residents over perhaps 15 square miles. This is a manageable size for committed citizens to mount an affordable campaign to get elected. With at-large elections, a candidate would need to canvass 100 square miles and a community of over 50,000 citizens -- a task that will favor those with money and connections.

To summarize, while the RCPG supports the merger of the agencies, we strongly oppose the at-large election provisions of the application and encourage LAFCO to ensure that the governance system consist of only district elections with no at-large components. The California Voting Rights Act has found at-large election systems to be unlawful in many areas so we feel that LAFCO should avoid using this form of governance in the combined agency.

Sincerely,

The Rainbow Community Planning Group

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