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SAN DIEGO LAFCO

August 10, 2020

Chair Dianne Jacob
San Diego Local Agency Formation Commission
9335 Hazard Way, Suite 200
San Diego, CA 92123

RE: Fallbrook and Rainbow proposals to detach from the San Diego County Water Authority

Dear Chair Jacob,

Earlier this year, the Fallbrook Public Utility District (Fallbrook) and the Rainbow Municipal Water District (Rainbow) filed applications with the San Diego Local Agency Formation Commission (LAFCO) seeking detachment from the San Diego County Water Authority (SDCWA) and annexation into the Eastern Municipal Water District.

The City of Escondido acknowledges that both Fallbrook and Rainbow have a responsibility to act in the best interest of their ratepayers. However, their proposed detachment will affect the remaining 22 retail water agencies of the SDCWA, Escondido among them. Before considering approval of the Fallbrook and Rainbow detachment applications, we believe that LAFCO should thoroughly analyze the impacts – financial, operational, governmental, and environmental – on *all* San Diego County ratepayers.

Specifically, we recommend that LAFCO analyze the following:

1. Measures to insure that the SDCWA and its members agencies are not financially disadvantaged by the detachments and that financial commitments made to the benefit of Fallbrook and Rainbow are honored after detachment;
2. Impacts on the mix of water imports into San Diego Country between the Colorado River and the State Water Project, including an analysis of possible increases in State Water Project imports and consistency with State policy; and
3. Impacts of the change in the SDCWA's voting power on the Board of the Metropolitan Water District of Southern California (MWD) and measures to mitigate the negative impact on San Diego County of a loss of voting power.

We agree with the Board of Directors of the SDCWA that LAFCO should ensure that the public and all affected agencies have a meaningful and balanced opportunity to engage in the evaluation of these detachment applications.

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Thank you for your consideration of our comments.

Sincerely,



Paul McNamara
Mayor, City of Escondido



Consuelo Martinez
Deputy Mayor, City of Escondido
Member of the Board of Directors, SDCWA

cc: Keene Simonds, Executive Director, LAFCO