



San Diego County Local Agency Formation Commission

Regional Service Planning | Subdivision of the State of California

SUPPLEMENT Agenda Item No. 6a

March 7, 2022

TO: Commissioners

FROM: Keene Simonds, Executive Officer
Priscilla Allen, Analyst I

SUBJECT: Comments Received from the San Diego County Water Authority

This supplement addresses written comments received from the San Diego County Water Authority on the final report prepared on the scheduled municipal service review on the Fallbrook region. The comments were received after the agenda packet was posted online and distributed to Commissioners on Monday, February 28th. The comments are attached and directly accompanied by staff responses, which are shown in indented red font. Staff believes most of the comments do not require revisions to the final report or additional analysis either through an addendum or other LAFCO document. Exceptions are noted and staff will be prepared to address these as part of its verbal report at the scheduled hearing on March 7th.

Attachment: as stated

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March 1, 2022

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OTHER REPRESENTATIVE

County of San Diego

San Diego LAFCO
Keene Simonds, Executive Officer
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RE: Comments on Final Report for the Municipal Service Review on the Fallbrook Region – AND REQUEST FOR AMENDMENT OF MSR TO INCORPORATE LAFCO EXPERT REPORT FINDINGS

Dear Mr. Simonds:

The San Diego County Water Authority here provides its formal written comments on the Final Municipal Service Review (“MSR”) for the Fallbrook Region, which is scheduled for consideration at the March 7, 2022, commission meeting. The Water Authority appreciates the Commission’s one-month continuance on accepting the MSR to allow for consideration by and discussion with the LAFCO Ad Hoc Advisory Committee that conducted its meeting on February 17, 2022.

The Water Authority described in its September 18, 2020 - Combined Response to Reorganization Applications by Fallbrook/Rainbow (“Combined Response”) the core issues and relationship of the detachment proceedings to Municipal Service Reviews and Sphere of Influence Updates (pp. 4-9), and the Water Authority’s role as a regional planning agency working in coordination with SANDAG to provide a reliable water supply (pp.25-39).

The comments provided here arise in part out of the responsibilities described in the Combined Response and in part out of the recently released LAFCO Hanemann expert report (“LAFCO Expert Report”), which is not yet mentioned in the MSR, presumably due to its delay in release. The Water Authority very much appreciates the additional time that was provided to the parties and public to review the LAFCO Expert Report in connection with the MSR, which was very beneficial.

As you know, MSRs are required to be prepared in connection with any update to a sphere of influence, as is being proposed with the Rainbow and Fallbrook reorganization proposals, which would alter those agencies, as well as the Water Authority’s, MWD’s, and Eastern MWD’s spheres and service areas. (Gov. C. Section 56430) Therefore, this MSR is inextricably linked to the future services to be provided in these areas and is not merely a “snapshot” or “lookback,” but is importantly an analytical aid for the future. We hope our comments below will assist in the Commission's understanding of the issues and local conditions.

1. Page 15, Calculating Population Estimates and Projections – *Report uses data “generated by Esri and their own mapping analyses of census tracts. This approach differs from past Commission practice to utilize estimates by” SANDAG...*

Comment: The MSR does not provide a substantive explanation why LAFCO is no longer using SANDAG projections rather than its own Esri software for population estimates and projections. Since one purpose of the Report is findings to develop buildout estimates specific to each affected agency in the Fallbrook region in coordination with the County and SANDAG, consistency is essential. SANDAG can provide population estimates by Water Authority member agencies’ service areas, as they currently do for each Urban Water Management Plan update. As discussed at length in the Water Authority’s Combined Response, the Water Authority works closely with SANDAG, its member agencies and other regional planning agencies to plan for and provide a reliable water supply for San Diego County. Moreover, LAFCO Administrative Policy No. A-101 recognizes the interdependent roles of LAFCO and SANDAG, providing in part that LAFCO will utilize the most recent SANDAG growth forecast for planning purposes (see Combined Response at pp. 25-39 and p. 27 relating to LAFCO Administrative Policy No. A-101). We believe this is an important issue that warrants further discussion and consideration by LAFCO staff and the Commission.

RESPONSE: No revisions to the municipal service review report appear merited. Staff believes a substantive explanation for the comment is provided within the referenced section – Calculating Population Estimates and Projections, Page 15 – in justifying LAFCO’s use of Esri software to make associated population projections. The justification ties directly to Esri’s ability to readily sync current demographic data to special district boundaries; a service not presently available from SANDAG. This approach has been similarly employed by LAFCO in preparing all other municipal service reviews since 2017.

2. Page 18, 4.1 General Themes and Conclusions – *“Most notably, the region’s historical immersion in agriculture with avocados being the primary cash crop over the last 60 plus years appears to be waning and could spell fundamental changes in land uses and municipal service needs going forward.”* Also, “[m]ore of this acreage appears to have been left fallow and suggests – among other items – the cost of growing avocados in the “Avocado Capital of the World” for many local farmers has become unsustainable.”

Comment: These “general themes and conclusions” are contrary to the facts detailed in the County of San Diego’s 2020 County Crop Statistics and Annual Report. On page 7 of the 2020 Crop Report, it states: “The overall value of commercial agriculture in San Diego County increased 0.8% from 2019 to 2020. This change is mainly due to an 8% increase in the value of the Bedding Plants, Color, Perennials, Cacti & Succulents crops together with a 9% increase in avocados.” [emphasis added] The 2020 Crop Report can be found online at: <https://www.sandiegocounty.gov/content/dam/sdc/awm/docs/2020CropReportSanDiego.pdf> This is the most recent published Crop Report for the County.

In addition, at a more colloquial level, Charlie Wolk, a highly regarded community leader, avocado grower, and a Fallbrook PUD board member, maintains a blog called “Growing Avocados”. In a recent article on his blog titled “How to Grow Avocados for Profit”, he comments: “I believe avocados to be one of the best investments both for long-term gain and short-term income. The caveat is you have to have the knowledge and resources to farm the crop correctly. Without this condition you can lose a lot of money. Let me know if I can help.” (January 14, 2021) Link to blog article: <https://avocadogrowing.com/how-to-grow-avocados-for-profit/>

In short, the MSR’s “general themes and conclusions” about the future of growing avocados in Fallbrook are unsupported by the available facts (as well as influenced by many outside market conditions and forces on agricultural products, including Mexico’s avocado market, also not discussed in the report but pertinent to its impacts). While the Water Authority agrees with SANDAG’s projections that land use transitioning from agricultural to residential use will occur and result in continued population growth in the region, this does not lead to the conclusion that the cost of growing avocados, “has become unsustainable for many local farmers.” In fact, this conclusion is contrary to available factual information about the increasing profitability of avocados – up 9% in the last year – and the ongoing effort to continue and add avocados as a crop because of its potential for high revenue generation. This is an especially important fact to include in the MSR, given the unsupported claims to the contrary by Fallbrook and Rainbow in the detachment proceedings. Please add the 2020 Crop Report data and Wolk blog to the MSR in order to provide a more complete and accurate report of these factors to the Commission and public.

RESPONSE: No changes to the municipal service review report appear merited. Staff believes the referenced conclusion – No. 3 | Avocados’ Influence in the Region, page 20 – is factual in noting a substantive decline in the avocado production in the region is occurring as measured by planted acreage. This statement directly ties to statistics provided in the Ag Commissioner’s 2016 and 2020 Crop Reports. The conclusion proceeds to appropriately deduce the decline in planted acreage “suggests the costs of growing avocados in the Avocado Capital of the World is becoming unsustainable...” Incidentally, and specific to the topic of profitability, staff believes it is reasonable – although not an absolute – to assume yields over the long term will decrease in relationship to decreases in planted acreage.

3. Page 19, Conclusion No. 2 – “Fallbrook region has...experienced a significant amount of consolidation in local government in recent history,...”governance agencies reduced by one-half (from 8 to 4)...”community interest in the topic appears limited at this time and materially contributed to the Commission choosing to reject last proposed consolidation in region involving Fallbrook PUD’s proposed takeover of Rainbow MWD in Sept 2015.’”

Comment: The Water Authority agrees that further consolidation in the region should be considered, as was previously recommended for Fallbrook and Rainbow. This would appear to be a far better solution to address the agencies’ financial distress, rather than pursuing a detachment that “gambles” with Fallbrook and Rainbow customers’ water supply reliability and rates and which divides and adversely affects the rest of the County.

RESPONSE: Comment acknowledged.

4. Page 20, Conclusion No. 4 – “Growth is happening...irrespective of the staying power of avocados and agriculture overall”; “...demand for housing pair with this region’s available land supply, more than 2/5 of which is undeveloped.”

Comment: The Water Authority agrees with the above conclusion and that it presents a more accurate and complete description of the facts than the MSR’s “general themes and conclusions,” discussed at paragraph 1 above, commenting (inaccurately and incompletely) on the sustainability of avocados and agriculture in the region.

RESPONSE: Comment acknowledged.

5. Page 20, Conclusion No. 7 – *Fallbrook PUD and Rainbow MWD “have experienced clear and measurable financial stresses during the report period...declines in liquidity... Rainbow MWD finishing with negative average total and operating margins over the corresponding 60 months...the recent trends are noteworthy and merits additional Commission attention going forward.”*

Comment: The Water Authority agrees with the above conclusion and that the situation merits further review by the Commission now, including potential consolidations that could provide a real measure of relief for the customers served by these agencies.

RESPONSE: Comment acknowledged.

As provided in Conclusion No. 2 | Slow and Steady Consolidation of Local Government on page 19, the consolidation of Fallbrook PUD and Rainbow MWD was considered and disapproved by the Commission in 2015. Staff believes no information in the municipal service review report suggests revisiting consolidation now would substantively change the Commission’s baseline assessment from 2015.

6. Page 21, Conclusion No. 9 - *Reorganizations are on the Mind of Locals: There are three separate reorganization proposals currently on file with the Commission that propose substantive jurisdictional changes within the Fallbrook region and – among other items – necessitate conforming sphere of influence actions. Two of the proposals involve separate requests by Fallbrook PUD and Rainbow MWD to change wholesale water suppliers and detach from the County Water Authority and annex to Eastern MWD. The third proposal involves Fallbrook PUD’s request to activate its park and recreation, roads, and street lighting functions. As intended under statue, the Commission will draw on the information in this report in considering the individual merits of each proposal at separately noticed hearings.* [emphasis added]

Comment: Fallbrook and Rainbow customers have paid hundreds of thousands of dollars in order for LAFCO to retain an expert consultant to review the merits of the claims being made by the agencies’ General Managers in the two proceedings for detachment from the Water Authority in order to annex to Eastern MWD in Riverside County. The applications present a question of first impression, which to our knowledge, no other LAFCO has ever

been asked to approve, namely, the detachment of a retail water supplier from its home county, wholesale water supplier and planning agency. But the MSR does not even mention the LAFCO Expert Report, which not only sheds important light on many of the issues discussed in the MSR but is directly related to Conclusion No.9 which states expressly that the Commission will draw on this MSR in considering the individual merits of each of the detachment proposals.

In summary, the LAFCO Expert Report should be referenced, its conclusions should be incorporated throughout the MSR where relevant, and the full LAFCO Expert Report by Dr. Hanemann should be included as an attachment to the MSR. Further, the Commission should direct that LAFCO's Expert Report be made available to all Fallbrook and Rainbow customers, because doing so would provide essential information related to the MSR and potentially negate the need for further detachment proceedings.

RESPONSE: No changes to the municipal service report appear merited. The municipal service review and reorganization proposals are statutorily separate activities and marked by the former having been scheduled by the Commission in June 2018 and ahead of the latter's filing in April 2020. Additionally, while the municipal service review serves to directly inform reorganizations over the next five-year period, the opposite does not apply; reorganizations do not directly inform municipal service reviews.

7. Page 22, Recommendation No. 3 - San Diego LAFCO should coordinate with the County of San Diego to identify permitted groundwater wells and septic systems within Fallbrook PUD and Rainbow MWD and incorporate the information into a future municipal service review.

Comment: The historic passage of the Sustainable Groundwater Management Act ("SGMA") in 2014 set forth a statewide framework to help protect California's groundwater resources over the long-term. SGMA is comprised of a three-bill legislative package, including AB 1739 (Dickinson), SB 1168 (Pavley), and SB 1319 (Pavley), and subsequent statewide Regulations.

In signing SGMA, then-Governor Jerry Brown emphasized that "groundwater management in California is best accomplished locally." SGMA mandates that such local actions be taken and includes findings that:

- "integrated management of the state's water resources is essential to meeting its water management goals;
- excessive groundwater extraction can cause overdraft, failed wells, deteriorated water quality, environmental damage, and irreversible land subsidence that damages infrastructure and diminishes the capacity of aquifers to store water for the future;
- groundwater management will not be effective unless local actions to sustainably manage groundwater basins and subbasins are taken;

- sustainable groundwater management in California depends upon creating more opportunities for robust conjunctive management of surface water and groundwater resources; and
- climate change will intensify the need to recalibrate and reconcile surface water and groundwater management strategies.”

The passage of SGMA expressed a legislative intent and urgency to address groundwater issues at a local level across California. The groundwater analysis for this MSR is needed now, not in a future report. This information is critical not only for the pending MSR and detachment analyses, but also for compliance with state law. The analysis would presumably include reference to the following elements.

First, records review shows that Rainbow Valley has a Groundwater Management Plan. The Water Authority is attempting to secure a copy of the plan.

Second, Fallbrook and Rainbow are part of the Santa Margarita Watershed adjudication finalized in 1963, with modifications in 1966. The adjudication does not quantify groundwater rights but does confer the court jurisdiction to quantify rights in the future.

Third, the Upper San Luis Rey Valley groundwater sub-basin, just west/southwest of Fallbrook, has a medium priority designation under SGM, which thereby requires these local agencies to form a groundwater sustainability agency (GSA) (for the high and medium priority basins). GSAs develop and implement groundwater sustainability plans to avoid undesirable results and mitigate overdraft within 20 years. A GSA was recently formed by its members including the County of San Diego, Pauma Valley Community Services District, Yuima MWD and Upper San Luis Rey Resources Conservation District. A Groundwater Sustainability Plan was submitted in January 2021 which included 38 acres of Rainbow overlying land in the sub-basin.

The MSA report should also account for the Lower San Luis Valley south of Fallbrook. This groundwater sub-basin is currently designated very low priority for SGMA purposes.

One final note based on preliminary review is that Rainbow Creek (surface water) is covered by a TMDL for total nitrogen and phosphorus. The groundwater table is high and Rainbow Creek is a gaining stream, fed by groundwater. Part of the impairment listing included recommendations for a Groundwater Investigation and Characterization work plan and report and onsite sewage treatment system management to control for nitrate contributions. This also warrants inclusion and full discussion in the MSR.

RESPONSE: This comment merits additional analysis either as part of an addendum to the municipal service review report or other Commission planning document. The focus of the additional analysis relates to the Commission’s task to regulate all special districts authorized service functions and classes paired with the need to address Fallbrook PUD and Rainbow MWD’s role in groundwater management.

8. Page 22, Recommendation No. 9 - Opportunities for additional consolidations in the Fallbrook Region appear notionally plausible – and, in some cases, presumable probable.

Comment: Again, the Water Authority agrees with the above Report recommendation of potential benefits of consolidations within the Fallbrook Region and believes they should be explored now, as extraordinary detachment applications are pending before the Commission, not delayed until the next MSR is due.

RESPONSE: Comment acknowledged.

9. Page 24, Growth Projections & Related Demographics No. 2 - San Diego LAFCO independently estimates the annual population growth rate within the affected agencies in the Fallbrook region during the five-year report period as follows:
(a) 0.4% annual population growth rate within Fallbrook PUD.
(b) 1.4% annual population growth rate within Rainbow MWD.
(c) 0.7% annual population growth rate within North County FPD.

Comment: The basis of these projections should be described, including the extent to which they do or do not incorporate LAFCO's projection in other parts of the MSR of the pace that residential housing will replace agriculture. The MSR should also describe how, if at all, these numbers have been coordinated with SANDAG's land use and population projections. A statement describing the actions taken by LAFCO that are inconsistent with SANDAG's process and projections should be added to the MSR with an explanation why LAFCO Administrative Policy No. A-101 is not being followed with respect to this MSR.

RESPONSE: No changes to the municipal service review report appear merited. The municipal service review report includes detailed agency profiles for all four affected agencies (Chapter Three) and presents analysis of each's population and demographic characteristics (Sections 4.0). The agency profiles serve as the basis in informing the referenced determinations – Growth Projections and Related Demographics No. 2, page 24 – and draw on data generated by Esri for reasons described in response to Comment No. 1. SANDAG has not produced any recent population or related demographic projections for the affected agencies and therefore no inconsistencies exist.

10. Page 25, Growth Projections & Related Demographics No. 5 - The Fallbrook region's location near existing transportation corridors (State Route 76 and Interstate 15) and inclusion in the San Diego County Water Authority and Metropolitan Water District of Southern California's wholesale water jurisdictions suggests substantive growth will occur in the future – though not necessarily in the timeframe of this report. [emphasis added]

Comment: If the conclusion is that substantive growth will occur in the future for FPU and Rainbow, then the MSR analysis as written is not sufficient for the Commission to make an informed decision on detachment and its impacts, including the projected demands as well as magnitude in loss of voting rights at Metropolitan Water District that is based on assessed land values.

RESPONSE: No changes to the municipal service review report appear merited. The litmus test for the Commission in determining whether the municipal service review is adequate and/or complete is prescribed under statute and specific to the Commission’s discretion in making determinations under Section 56430. Separately, the litmus test for the Commission in making an informed decision on specific jurisdictional changes – such as the proposed reorganization filings by Fallbrook PUD and Rainbow MWD – involves the Commission’s discretion in considering factors listed in Section 56668. Staff’s analysis of these latter factors will be provided in conjunction with presenting reports on the proposed reorganizations at a future hearing. Further, and at the Water Authority’s request, staff’s analysis will address potential impacts to voting rights at MET.

11. Page 34 - (c) Fallbrook PUD’s actual operating expenses increased by 19% during the five-year report period. This amount is one-third higher than the corresponding 14% increase in actual revenues for Fallbrook PUD and merits revisiting in the next scheduled municipal service review to assess whether the imbalance is structural or temporary.

Comment: The increasing disconnect between Fallbrook PUD’s operating expenses and revenues demonstrates that this analysis should be performed now in this MSR, not in a future report. This is the only way that the Commission will have all of the information it needs to make an informed decision about the detachment applications now under its consideration. There is no apparent reason for kicking this can down the road at this obvious turning point for Fallbrook and Rainbow customers, especially in light of the findings of the LAFCO Expert Report.

RESPONSE: No changes to the municipal service review report appear merited. The requested analysis is appropriately deferred to consideration of the reorganizations as referenced in response to Comment No. 10. This deferred analysis will appropriately incorporate multiple resources, including the municipal service review and the Hanemann report, in making an informed conclusions on Rainbow MWD and Fallbrook PUD’s financial standing and any effects (positive or negative) tied to the two reorganizations as deemed material by the Commission.

12. Page 26-27, FPUD facilities 1 (a) i-ix - Deliveries, demands, and GPCD numbers

Comment: On Table 4.1a it shows FPUD’s estimated 2020 total resident population at 33,986, and on page 27 it states, “LAFCO estimates the population in the potable water service area at the end of the five-year report period at 23,360. This estimate represents 69% of the total estimated District population.” Is LAFCO concluding that a full 31% of Fallbrook’s population is not on its potable water system? If so, LAFCO should identify

the source of water being used by this population, i.e., is irrigation coming from groundwater wells. If groundwater is being used for irrigation by one-third of the population, this would greatly impact conclusions regarding the amount of water being used for irrigation and the overall cost impacts of detachment, as detachment would not affect the cost of water for this population's water use.

RESPONSE: No changes to the municipal service review report appear merited. LAFCO assumes – as the comment suggests – the remaining 31% of Fallbrook PUD's estimated overall population is served by groundwater wells and/or other individual available sources. (This distinction ties into the municipal service review's recommendation to coordinate with the County in identifying total number of permitted groundwater wells within the service area.)

On page 27 it states, "Estimated per capita daily uses have decreased by (21%) over the five-year report period." However, this is based on a 2020 value that reflects wet-year (i.e. lower) potable demands (reported as 7,986 acre feet (AF) in Table 6.1b). Fallbrook's FY 2021 actual potable demand was about 8,900 AF, which would result in only about a 10% decrease in per capita use between 2016 and 2021 (using 2020 population for the 2021 GPCD calculation). Please explain these discrepancies, which would tend to understate the demand for water in Fallbrook.

RESPONSE: There are no discrepancies. The municipal service review uniformly draws on demand information generated between 2016 and 2020. Information for subsequent years is outside the data collection period.

13. Page 29-30, Rainbow facilities 2 (a) i-ix - Deliveries, demands, and GPCD numbers

Comment: On Table 4.1a it shows Rainbow's estimated 2020 total resident population at 22,130, and on page 29 it states, "...population in the potable service area at the end of the five-year report period at 17,003. This estimate represents 77% of the total estimated District population." Again, is LAFCO concluding that a full 23% of Rainbow's population is not on its potable water system? If so, LAFCO should identify the source of water being used by this population. Again, if groundwater is being used for irrigation by over one-fifth of the population, this would greatly impact conclusions regarding the amount of water being used for irrigation and the overall cost impacts of detachment, as detachment would not affect the cost of water for this population's water use.

RESPONSE: No changes to the municipal service review report appear merited. Please refer to the response provided for Comment No. 12.

Demand numbers are stated as "during the five-year report period." However, potable water demands (listed on page 120) are shown only for years 2016-2019. On page 30 it states, "Estimated per capita daily uses have decreased by (29%) over the five-year report period from 1,030 gallons to 728 gallons." However, this is based on a 2019 value that reflects wet-year (i.e., lower) potable demands (reported as 13,720 AF in Table 6.1b). Rainbow's FY 2021 actual potable demand was about 17,100 AF which would result in only about a 13%

decrease in per capita use between 2016 and 2021 (using 2020 population for the 2021 GPCD calculation). Please explain these discrepancies, which would tend to understate the demand for water in Rainbow.

RESPONSE: A change to the municipal service review report is merited to accurately clarify all written determinations in Chapter Two - Section 5.3 involving Rainbow MWD's potable water demands involve an abbreviated report period (i.e. 2016 to 2019).

14. Page 38 - *“(a) FPUD and Rainbow MWD maintain mutually beneficial interties with one another as well as with the City of Oceanside to receive and provide potable water in the event of emergency or planned interruptions to the San Diego Aqueduct”*

Comment: Please provide maps/graphics showing the intertie locations and explain how emergency services would be provided under varying conditions. This is an area in which the Water Authority has been seeking information and explanations from Fallbrook and Rainbow for many months, but which has not been forthcoming (see Combined Response at pp.85-90; and February 25, 2022, letter from General Manager Kerl to Adam Wilson at para. 4, p. 6). The question of emergency service preparedness is essential not only to consideration of these agencies' detachment applications but to the purpose of the MSR review.

RESPONSE: This comment merits additional analysis as part of an addendum to the municipal service review report or other Commission planning document. The additional analysis is specific to further substantiating information on Fallbrook PUD and Rainbow MWD's collaboration to address interruptions affecting their potable water systems.

15. Page 55, FPUD Potable Water Service – *this section's data reviewed against Water Authority's 2020 Urban Water Management Plan (UWMP) data*

Comment: The Report states: *“The estimated service population at the end of the period is 23,360.”* This value is more in-line with SANDAG's 2020 single-family (SF) household population for FPUD – not total population. Leaving this apparent error aside and leaving aside the agencies' continuing public and media objections to the accuracy of the Water Authority's demand projections, it is notable that there is only a 183 AF variance between Water Authority and FPUD average potable demand (2016 -2020) Table 6.1b – or, not statistically significant.

RESPONSE: Comment acknowledged.

16. Page 118, Rainbow Potable Water Service – *this section's data reviewed against Water Authority's 2020 UWMP data*

Comment: The Report's footnote on Page 118 states: *“The potable water service area population estimate by LAFCO utilizes the following formula: (number of single-family connections x 2.90) + (number of multifamily connections x 4 x 2.90).”* Does this mean Rainbow's estimated persons per household is 2.9 for single-family and 11.6 for multifamily? As in the case of Fallbrook, comparison of Rainbow's average potable

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demand (2016 -2019) from Table 6.1b is only a 59 AF variance from Water Authority's UWMP – again, not statistically significant.

RESPONSE: Comment acknowledged and affirmed.

Again, the Water Authority appreciates the opportunity and time provided to make these comments. We hope you find the comments helpful and will agree to incorporate the full information into the Final MSR.

Sincerely,

A handwritten signature in black ink, appearing to read "Sandra L. Kerl". The signature is fluid and cursive, with the first name being the most prominent.

Sandra L. Kerl
General Manager

Cc: LAFCO Ad Hoc Advisory Committee Members
SDCWA Board Members