



October 2, 2020

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

Re: Comments by Gary Croucher read into the record of the LAFCO  
Commission meeting of August 3, 2020

Dear Chair Jacob and LAFCO Commissioners,

The Rainbow Municipal Water District Board of Directors have learned that Gary Croucher, the current Chair of the San Diego County Water Authority (SDCWA) and a participant on the LAFCO Advisory Committee on the reorganization proceedings for the Fallbrook Public Utilities District and Rainbow Municipal Water District, had a statement read into the record of the LAFCO Commission meeting on August 3, 2020 that RMWD Board of Directors feel compelled to reply to for the record.

Mr. Croucher's statements include the comment: "No one disputes that these [Fallbrook Public Utility District and Rainbow Municipal Water District] are troubled retail agencies." He also made comments related to "internal management issues" that are unsupported by facts. He went on to state that he was making this statement after having reviewed the record of previous proceedings at LAFCO that occurred approximately six years ago involving an unrelated issue.

The 2014 LAFCO proceedings are in no way related to applications currently being considered. We believe Mr. Croucher knows this, but he still felt compelled to mention it for the record. His comments were uncalled for and unwarranted.

In response to Mr. Croucher's derisive comments and for the record, the Board of Directors at Rainbow Municipal Water District would like to point out that our organization has been determined to be a *District of Distinction* by the Special District Leadership Foundation. The Foundation, a Sacramento-based statewide component of the California Special District Association, states its mission is "To promote and recognize excellence in the governance and management of special districts." Only about 1% of special districts statewide have achieved this accreditation.

The District has also received the Foundation's *Transparency Certificate of Excellence*, awarded in 2015, 2017 and 2019. This award is only given in odd numbered years.

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This has been accomplished through the leadership of Rainbow's Board of Directors, its General Manager Tom Kennedy, and its staff. Mr. Croucher's comments appear to be an effort on the part of the San Diego County Water Authority to tarnish Rainbow's reputation in the eyes of the Commission rather than deal constructively toward finding a solution as Chair Jacob has instructed all parties to do.

Our detachment application is focused entirely about the preservation of the rural character of our region as well as our agricultural industry that is being decimated by the high cost of water. State law provides our agency the right to allow our ratepayers to decide who they want to purchase their wholesale water from and the application before LAFCO is part of our exercise of the rights granted to our agency.

With all that said, Rainbow Municipal Water District has nothing to hide. We encourage anyone so motivated to review the records regarding the 2014 failed merger. They'll quickly determine that it is simply not germane to the current applications before LAFCO.

The Board of Directors at Rainbow Municipal Water District fully supports the direction set by the Commission for the parties associated with our application to sit down and resolve any disputes. We have been trying for 18 months to do just that without any meaningful participation by SDCWA.

Sincerely,

The Rainbow Municipal Water District Board of Directors

A handwritten signature in black ink that reads "C. H. Hamilton, III". The signature is written in a cursive style with a horizontal line under the name.

Hayden Hamilton, Division 2  
Board Vice President