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February 19, 2019

Via FAX 805-788-2072

Mr. Brian Pierik, Counsel
San Luis Obispo LAFCO
1042 Pacific Street, Suite A
San Luis Obispo, CA 93401

Re: LAFCO file # 4-R-16
Estrella-El Pomar-Creston Water District

Dear Mr. Pierik:

I am writing regarding the February 21, 2019 hearing at which time the LAFCO Commissioners will consider the replacement of Condition #11 and related matters.

I respectfully submit that consideration of this matter is wholly premature and should be postponed. The Reality is that there are two predicate issues which require attention and until those issues have been addressed consideration of all other matters related to the EPCWD need to be postponed.

The two issues are:

1. The Water Code criteria relating to the maximum separation of district member parcels, which is two miles.

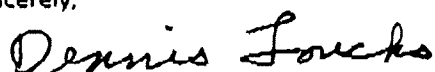
When LAFCO approved the formation of the EPCWD in April 6, 2017 no certification or confirmation of the District's compliance with the maximum distance limitation was presented. In fact the LAFCO staff report was silent on that matter.

2. WC34153 indicates: "Land, which is capable of using water beneficially for irrigation, domestic, industrial or municipal purposes and which can be serviced from common sources of supply and by the same system of works, may petition for the formation of a district".

Clearly, the EPCWD does not operate utilizing the same system of works and does not meet this criterion of the code.

Until each of these matters has been satisfactorily addressed I believe it is prudent to delay LAFCO's consideration of other matters concerning the EPCWD.

Sincerely,



P.S. I assume this letter will be made available to the LAFCO Commissioners prior to the start of the meeting.