



A Limited Liability Partnership • Est. 1939

Ernest A. Conant, Partner

November 13, 2018

San Luis Obispo Local Agency Formation Commission
1042 Pacific Street, Suite A
San Luis Obispo, CA 93401

RE: Estrella-El Pomar-Creston Water District—LAFCO File 4-R-16

Dear Commissioners:

We serve as general counsel for the Estrella-El Pomar-Creston Water District (District). I have for over 39 years served as counsel for various water districts and agencies and been involved in various groundwater projects, and am very familiar with SGMA.

I am writing to endorse the finding of your Executive Officer in his Staff Report concerning this matter and to confirm that the District has without question met Condition number 11 of your Resolution No. 2017-02 requiring that the District within one year of formation “become a Groundwater Sustainability Agency (GSA) or a GSA Partner” The District is not seeking to become a GSA but has become a GSA partner through executing and implementation of a Partnerships Agreement with Shandon-San Juan Water District (SSJ), which is attached to the Executive Officer’s report.

In carrying out the responsibilities as an operating water district and carrying out the Partnership Agreement with SSJ, the District has, among other things: carried out a successful Proposition 218 vote to ensure funding for the District with a 98% favorable vote, adopted Bylaws, jointly hired a hydrogeologist firm pursuant to the Partnership Agreement with SSJ to participate in and support the GSP development process for the Paso Robles Basin, participated in and explored opportunities for use of recycled water from the City of Paso Robles, participated in various GSP and committee meetings, and joined the integrated regional water management (IRWM) group and submitted an application for a Huero Creek infiltration improvement project.

Since the District having been duly form and carried out various tasks as an operating district, including levying and collecting assessments and entering into contracts, if LAFCO were to dissolve the District significant legal entanglements could result to attempt to wind up the affairs of the District.

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I urge you, consistent with your Executive Officer's analysis that the District has met condition number 11, to **determine that the District has complied with your Conditions of Approval.** Thank you for your consideration of this matter.

Respectfully,



Ernest A. Conant

cc: Estrella-El Pomar-Creston Water District Board of Directors