

October 8, 2020

President Edward J. "Ted" Costa
San Juan Water District
PO Box 2157
Granite Bay, CA 95746

Re: *SJWD Proposed Electoral Map*

Dear President Costa,

On behalf of the Citrus Heights Water District and Fair Oaks Water District ("Retail Agencies"), we wish to express our disappointment with the San Juan Water District's Board of Directors' decision to move forward with adoption of Map B. While the Retail Agencies recognize that the Board of Directors has the discretion to approve division maps subject to applicable legal standards, Map B results in divisions without any reference to existing county, city, and neighborhood boundaries. The Retail Agencies worked in good faith to provide alternative maps for SJWD's consideration that reflected these communities of interest. We repeat our objection to Map B and urge the SJWD Board to consider alternatives.

Map B nominally seeks to recognize the existing urban-rural split within SJWD. As explained in prior comment letters, it does a poor job of doing so. First, SJWD measures "urban-rural" through the use of household density. This does not distinguish between urban vs. rural areas and simply shows the average size of households. Second, Map B focuses on Division 1 to exclude urban portions of Granite Bay. In doing so, the map lumps this urban area and portions of the City of Citrus Heights with largely rural areas. Third, the eastern portion of Division 3 abruptly juts into Division 1 ignoring logical boundaries like the major thoroughfares of Eureka Road and Roseville Parkway.

We can see no obvious reason for the oddly shaped districts lines in Map B. Constituents have the right to expect clean district lines that make sense in relation to the community. To help provide context, enclosed is Map B with two overlays: (1) county, city, and neighborhood boundaries and (2) the home locations of SJWD Directors. As one can see with the help of these overlays, Map B simply ignores any existing county, city, or neighborhood boundaries. These communities of interest, especially the City of Citrus Heights, are divided to the maximum extent

President Edward J. "Ted" Costa
SJWD Proposed Electoral Map
October 8, 2020

possible. This is bad policy and undermines the letter and spirit of the California Voting Rights Act (CVRA).

While we don't know the intent behind every line on the map it is obvious that Map B protects SJWD incumbents to the extent mathematically possible. It does not reflect any real urban-rural divide. A map that appears to be based on incumbency protection is bad policy and contrary to the letter and spirit of the CVRA.

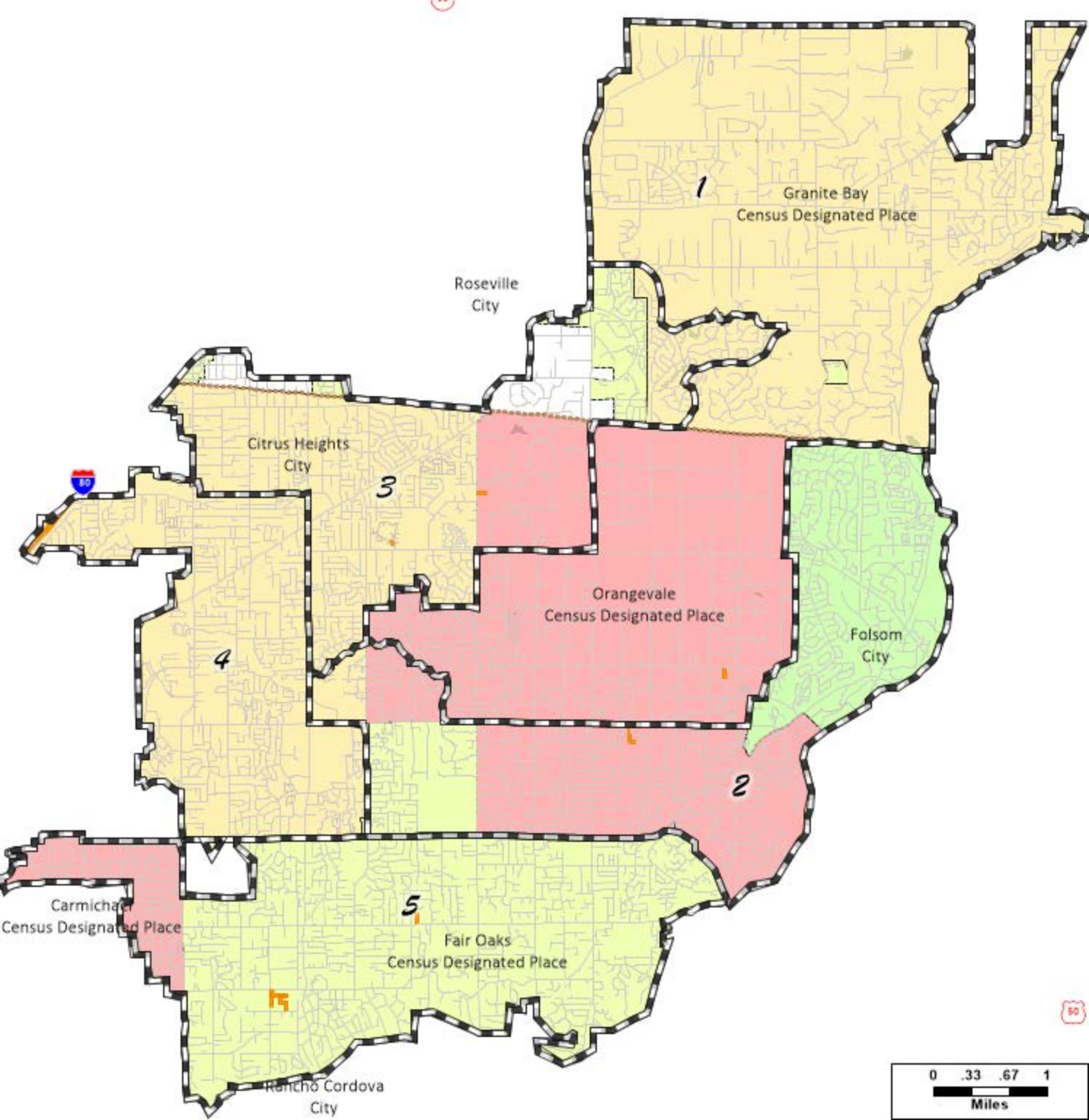
Our agencies are partners, and all good partnerships are built on trust, mutual respect, and compromise. We appreciate the opportunity to comment on and participate in this process. As constituents and customers of the SJWD we object to Map B. Please abandon this fatally flawed map and use an alternative map that respects existing communities of interest and the CVRA.

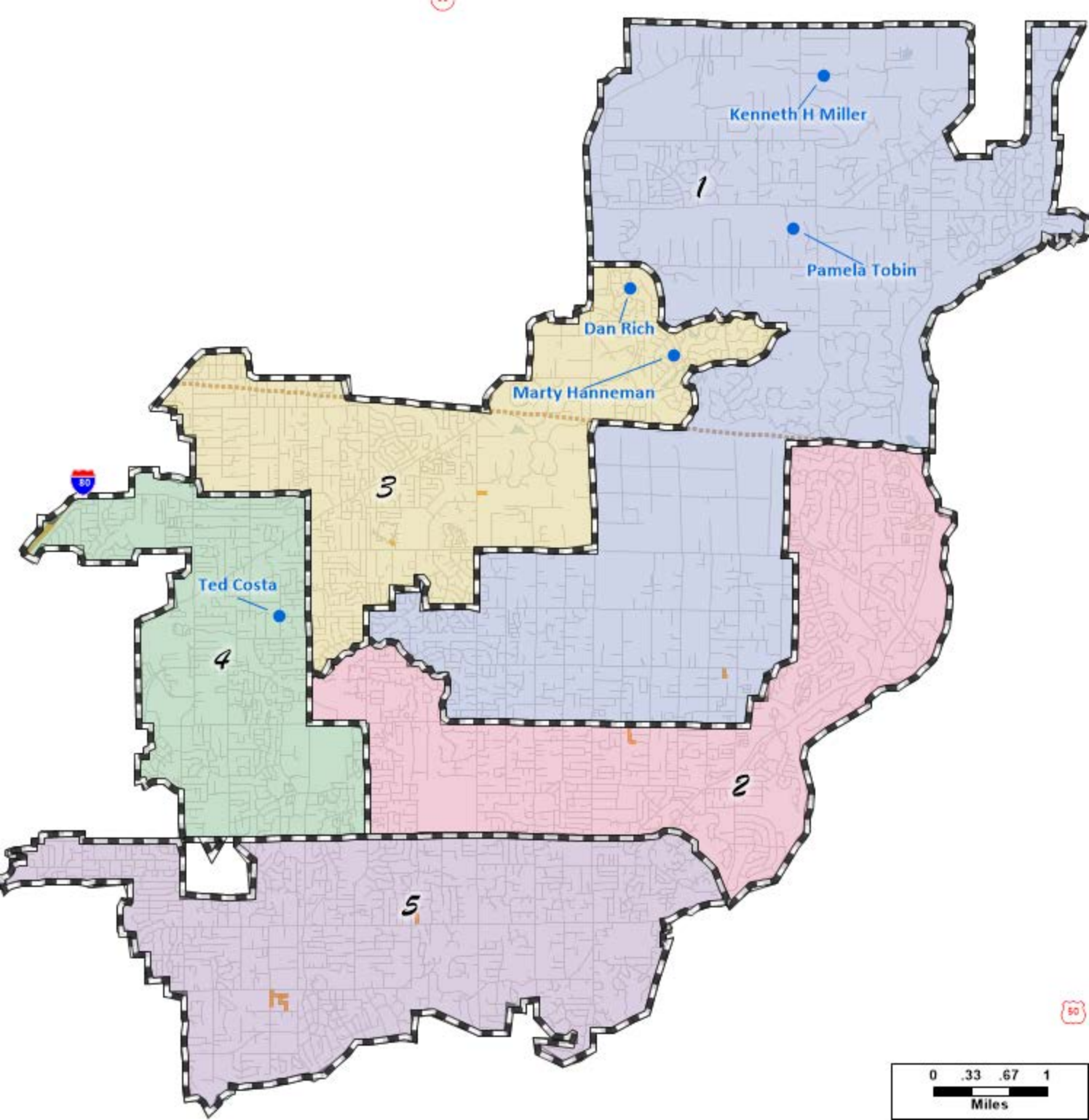


Ray Riehle
President
Citrus Heights Water District



Gary Page
President
Fair Oaks Water District





Kenneth H Miller

Pamela Tobin

Dan Rich

Marty Hanneman

Ted Costa

0 .33 .67 1
Miles