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September 11, 2007

Charles Rose, Chair
Peter Brundage, Executive Director
Sacramento Local Agency Formation Commission (LAFCo)
1112 I Street, Suite 100
Sacramento, CA 95814
FAX: 874-2939

RE: Request to Postpone Meeting Regarding LAFCo Consideration of Greenbriar SOI, EIR, Municipal Services Review, etc.

Dear Chairman Rose and Mr. Brundage,

The Sacramento County Local Agency Formation Commission (LAFCo) has scheduled a special meeting for September 19, 2007 to consider a proposed sphere of influence (SOI), Municipal Services review, and certification of the Environmental Impact Report (EIR) for the Greenbriar project. The Environmental Council of Sacramento (ECOS) requests that the matter be continued until a regularly scheduled LAFCo meeting.

LAFCo's regular monthly meeting is on the first Wednesday of each month. In order to avoid conflicts with LAFCo meetings, ECOS recently modified its meeting schedule, which previously included regularly scheduled board meetings and transportation and air quality committee meetings on the first Wednesday of each month. Now ECOS holds its board meetings on the third Monday of each month, and its transportation and air quality meetings on the third Wednesday of the month. Because of conflicts with the ECOS transportation and air quality committee meeting or other prior commitments, ECOS board members who had planned on attending the LAFCo meeting at which this matter will be considered will not be able to attend. These include ECOS board members who adjusted their personal schedules so that they could be available to testify on September 5, only to find out that the matter would instead be considered on September 19. I, personally, will be out of town on September 19.

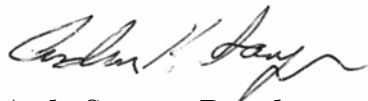
LAFCo's consideration of the proposed Greenbriar project raises a number of substantial issues of public policy. The U.S. Fish and Wildlife Service, California Department of Transportation, and Sutter County have stated serious concerns. Approval would result in

conversion of large areas of farmland into suburban development, in the absence of any LAFCo policy for the protection of agricultural lands and open space. Similarly, Greenbriar is vulnerable to deep flooding and there is no LAFCo policy to address flood hazard issues. The project is also inconsistent with the 2003 Natomas Basin Habitat Conservation Plan. To allow adequate consideration of these issues and full public participation, Greenbriar should be taken up at a regularly scheduled LAFCo meeting.

It appears that the matter is being scheduled for a special meeting in order to accommodate the developers' interest in an expedited approval and that that interest is driven, at least in part, by a desire to obtain approvals before new pending flood control legislation is enacted. Ironically, as a result of recent amendments to the pending legislation, which effectively delays new requirements or grandfathers projects with pending applications, it turns out there is no need to approve the project before the end of the year, even if the purpose is to avoid the requirements of new state legislation. (See Senate Bill 5, as amended September 5, 2007, and Assembly Bill 70, as amended September 7, 2007.) Regardless of whether the proposed approval involves an attempt to circumvent new requirements or whether the approval has that effect, LAFCo should give careful consideration to the public policy embodied in the pending legislation and ensure that any approvals are consistent with the responsible planning the pending legislation is intended to achieve.

Please continue this hearing to allow full public participation and full consideration of the important issues involved. Thank you for your attention.

Sincerely,



Andy Sawyer, President
Environmental Council of Sacramento (ECOS)

cc: Commissioner Tooker
Commissioner Miklos
Commissioner Fong
Commissioner Jones
Commissioner Peters
Commissioner Yee

See also:

- September 5 amendments to SB 5
- September 7 amendments to AB 70