

**Stuart Robertson
12130 Green Road South
Wilton, CA 95693**

March 15, 2010

Elk Grove City Council
8401 Laguna Palms Way
Elk Grove, California 95758

Sacramento LAFCo
1112 I Street, Suite 100
Sacramento, CA 95814

RECEIVED
MAR 17 2010
SACRAMENTO LOCAL GOVERNMENT
INFORMATION COMMISSION

Regarding Expanded Elk Grove Sphere of Influence

Dear Council and Commission Members,

As an owner of an Elk Grove business that pays over \$13,000 annually in property tax and generating about \$750,000 annually in other tax revenue, I object to the City spending our tax money to expand its Sphere of Influence into a setting for which it is not qualified to administer.

The City has no experience in managing a flood plain; moreover, the City demonstrates an inability to manage the facilities for which it is now entrusted. Witness the woeful disrepair of Waterman Road and Kent streets. Repair and maintenance of infrastructure under the existing trust of the City is its first responsibility – not the expansion of its Sphere of Influence into situations for which it has had no tax-base and no demonstrable ability to manage.

The Sphere of Influence efforts underscore the City's reputation as providing a difficult business environment by taking on more regulatory burdens. Rather than annexing new lands to resolve problems of landowners burdened by two governing bodies, I suggest you allow the County to do the job it has done for years, and step back to taking care of existing problems.

The City's effort to include the flood plain is but a ruse to capture undevelopable open space so that it can more densely populate the City within its urban services boundary. Because high density population correlates with high crime and lower quality of life, I suggest that the City expressly move toward lower density within its urban services boundary as opposed to its present effort in the wrong direction.

Please stop the Sphere of Influence expansion toward the Cosumnes River, and use our tax dollars to maintain the roads and services presently in the City.

Respectfully,



cc Supervisor Don Nattoli
Elk Grove Citizen
Sacramento Bee

Thorpe. Diane

From: Bill Kutzer [kutzerb@frontiernet.net]
Sent: Tuesday, August 18, 2009 6:54 AM
To: Commission. Clerk
Cc: Hume Pat; Scherman, Sophia; Cooper Jim; Gary - Davis; Detrick Steve; Nottoli. Don; Schutten. Terry; Brundage. Peter; Lockhart. Don; Echiburu Taro; Hazen Don; Gill Laura; Blacklock Patrick; Matthew Baker; Burness Rob; holtart4u@yahoo.com; Radmacher. Richard (MSA); Ford Linda
Subject: Elk Grove SOI

Hi Diane,

Please forward the letter copied/pasted below to the Commissioners.

Thank You.

Bill Kutzer
www.wiltonactiongroup.org
 916-687-7542
kutzerb@frontiernet.net

To Whom It May Concern:

The attached flyer was prepared by the Wilton Action Group (WAG) to address continuing concerns about the approach the City of Elk Grove is taking toward expanding the City's Sphere of Influence (SOI). This flyer supplements a flyer WAG sent out in July. It calls upon the City Council to carefully study the lessons of the City of Folsom's recently completed SOI expansion with the aim of avoiding a waste of time and money by taking steps to "right size" the SOI application being submitted to the Local Agency Formation Commission (LAFCO). Right sizing is the term Elk Grove City staff applies to the process of bringing City programs into line with current City budget requirements. In the case of the SOI application, this process would involve the following steps:

- Eliminating the floodplain from the SOI. This element of the application provides minimal benefit to the City but exposes the SOI expansion process to significant controversy that is likely to add substantial time, cost and uncertainty to the process.
- Getting the land use projections cited in the SOI application in order. As presently presented, the City's estimate of its acreage needs for accommodating future residential and employment growth is grossly inflated and lacks credibility. This deficiency will add to the controversy surrounding the SOI expansion process and increase the potential for delay, unnecessary expenditure and uncertainty.

We are hopeful that decision makers with a role to play in this process will consider these concerns and we look forward to playing a constructive role in helping Elk Grove get its SOI application right-sized before more of the City's time and money is unnecessarily wasted.

Elk Grove: Stop Wasting Time & Money....."Right-Size" the SOI

The Elk Grove City Council should learn the lessons of the 10-year SOI expansion process recently completed by the City of Folsom (Folsom) and get the size of its own SOI expansion process right. What can be learned from Folsom's experiences?

Lesson 1: Don't Overreach – Eliminate the Floodplain from the SOI

Folsom initiated its SOI expansion project in 1997 with an attempt to push its SOI south across Highway 50 and west all the way to Rancho Cordova, encompassing an area of almost 30,000 acres. Like Elk Grove's attempt to claim the Cosumnes River floodplain, this expansion greatly overreached anything remotely related to Folsom's actual growth needs. After two years, Folsom was forced to reduce the size of its proposed expansion to 3,500 acres, a 90% reduction! Elk Grove is bound to experience a similar waste of time and money unless the City eliminates the Cosumnes River floodplain from its SOI amendment.

Lesson 2. Get the Land Use Projections Right

The heart of an SOI amendment is a set of well-supported land use projections that demonstrate how much land is needed to accommodate future population and employment growth. Once Folsom was forced to reduce the size of its SOI expansion, they adopted land use projections that were consistent with those recommended in the Sacramento Area Council of Government's preferred regional Blueprint. Folsom concluded that it could accommodate up to 30,000 new residents on about 1,160 acres. By comparison, Elk Grove's SOI amendment application claims that the City needs 12,587 acres to accommodate an increase in population of 41,000 people over the next 25 years.

Residential Land Use Condition	Folsom SOI	Proposed for Elk Grove
Housing units/acre	10	1.5
People/acre	25	4

Elk Grove's proposed future housing density is less than half that of the current population of the City, which includes a significant rural residential area with very low density (1 unit on 2 acres), and is only a fraction of the density proposed in the Folsom SOI.

With respect to employment, Folsom concluded that it could accommodate up to 10,300 new employees in new commercial/retail and office uses covering about 450 acres. Elk Grove's application claims that the City needs 4,608 acres to accommodate 31,639 new employees. Elk Grove's density is about 40 percent of the employment density anticipated by the Folsom SOI expansion.

Elk Grove's land use analysis is out of line with current regional planning benchmarks and with emerging State requirements (Senate Bill 375) for reducing greenhouse gases. The analysis contains

Non-Residential Land Use Condition	Folsom SOI	Proposed for Elk Grove
Employees / acre	23	9

numerous methodological errors that significantly inflate the amount of land the City actually needs to accommodate its projected population growth and improve its jobs housing balance.

These errors should be corrected and the analysis should be revised before the Local Agency Formation Commission (LAFCO) is asked to proceed with the SOI amendment. Otherwise, like the initial version of Folsom's SOI amendment, the Elk Grove SOI expansion will justifiably be perceived as a prescription for urban sprawl and the City will be compelled to restructure the amendment after unnecessarily wasting time and money on the current poorly prepared application.

Estimates of actual vs. asserted land use needs (2035)		
Acreage Needed thru 2035	Elk Grove's estimates	WAG's estimates
Residential acres	12,587	2,300
Non-residential acres	4,608	1,000
Grand Total	17,195 acres	3,300 acres
Current vacant acres	5,200 acres	--

NOTE: WAG's estimates are based on a residential density of 9 housing units per acre, 23 people per acre, and a non-residential density of about 40 employees per acre associated primarily with office development. It was assumed that 23% of the land allocated to residential and non-residential uses would be occupied by roads, sidewalks, parks and other public infrastructure. Vacant acres estimated based on verbal communications with Elk Grove Planning Dept. staff.

Even if Elk Grove projects their needs out to 2060, as Mayor Hume has suggested, the City should not need more than roughly 6,600 acres, or about 1400 acres outside the current city limits.

Lesson 3: Settle with the County before Initiating the Environmental Review Process

One of Folsom's biggest problems was commencing the SOI amendment process, including the environmental review, before reaching agreement with the County on key elements of the SOI expansion. Most notably, the environmental review process was initiated without an agreement with the County on how important environmental resources in the SOI area would be protected. This caused a two-year delay in the amendment process. Elk Grove should not make the same mistake. Before asking LAFCO to initiate the environmental review process, the City should complete its negotiations with the County and agree upon the following: (a) appropriate protections for the floodplain, and (b) clearly defined mechanisms for landowners east of Grantline Road to develop those areas of their property outside the floodplain, should they wish to do so.

In Summary

By 'right-sizing' the SOI's projected land uses requirements, including dropping the floodplain from application and reaching agreement with County up front, the City can avoid the long drawn out and expensive process that Folsom experienced. This will avoid unnecessary expenditures of time and money on the SOI expansion at a time when other City projects and programs that affect the immediate needs of City residents are being cut.

Thorpe. Diane

From: Bill Kutzer [kutzerb@frontiernet.net]
Sent: Wednesday, March 17, 2010 9:24 PM
To: Gary - Davis
Cc: Scherman, Sophia; Detrick Steve; Cooper Jim; Hume Pat; Gill Laura; Echiburu Taro; Hazen Don; Commission. Clerk; Clerk of the Board; Gougherty Dan; Kalb Loretta; Sill Melanie; Lewis Mary; Soto Fran; Matthew Baker
Subject: Letter from WAG

March 17, 2010

Gary Davis, Councilmember
Elk Grove City Hall
8401 Laguna Palms Way
Elk Grove, CA 95758

Dear Gary,

The Wilton Action Group (WAG) welcomes your proposal to schedule for discussion on April 14 removing the Cosumnes/Deer Creek floodplain from Elk Grove's SOI. This discussion could lay the basis for resolving an issue that has taken on a costly and contentious life of its own. We appreciate the fact that for a long time, you have questioned the sensibility of including the floodplain in the SOI, especially considering the fact that Elk Grove is organized to provide urban services, not to manage working landscapes.

We are convinced that an Elk Grove expansion South and Southeast into the floodplain and up to the North/Northwest boundary of the Cosumnes River is a threat to the rural community of Wilton. We believe that the floodplain should remain under the jurisdiction of the County, an entity more qualified and better suited than the City of Elk Grove to manage and protect the agricultural lands, open space and habitat along the Cosumnes corridor.

The Wilton Action Group's point of view is, and always has been, that if the floodplain is removed from the SOI, WAG will not oppose the remainder of an amended SOI request. From day one of the SOI request, we have been very clear, upfront, and transparent about our position. We believe your move to discuss removal of the floodplain next month is wise and appropriate. There is strong sentiment among not only Wilton but also among many Elk Grove residents, as well as other communities in our region and the environmental community.....all saying the same thing..... The floodplain does not belong in the SOI.

We appreciate your efforts to address this issue in a timely way. And we want to reiterate so it is perfectly clear: If the Council's discussion results in an action to remove the floodplain from the SOI, WAG will not oppose the revised SOI request.

Sincerely,

Bill Kutzer
Wilton Action Group

cc:
Sophia Sherman, Mayor
Steve Detrick, Vice Mayor
Jim Cooper, Councilmember

3/30/2010

Pat Hume, Councilmember
Laura Gill, Elk Grove
Taro Eichburu, Elk Grove
Don Hazen, Elk Grove
Sacramento Board Of Supervisors
SacLAFCo Commissioners
Elk Grove News.Net
Sacramento Bee
Elk Grove Citizen
River Valley Times
ECOS

Wilton IS a good place to be. Elk Grove thinks so, too.

Bill Kutzer
www.wiltonactiongroup.org
916-687-7542
kutzerb@frontiernet.net

Lockhart. Don

From: Bill Kutzer [kutzerb@frontiernet.net]
Sent: Wednesday, March 24, 2010 11:16 PM
To: Commission. Clerk
Cc: Brundage. Peter; Lockhart. Don
Subject: WAG letter
Attachments: Wayne MOU Letter.pdf

Hi Diane,

Could you please forward this letter from a WAG member to the Commissioners and the alternates? Also, could you please let me know that you received this e-mail and that you were able to send it forward?

Thank You.

Bill Kutzer

Elk Grove's "Listening Sessions" – Who is Listening?

Elk Grove's so-called "Listening Sessions" regarding public input on their proposed Sphere Of Influence have been costly, time-consuming, and a well-done example of "smoke and mirrors". After having seen all of the sessions, I have no doubt that nearly all the individuals and organizations who spoke want the Cosumnes River flood plain dropped from the SOI. The reasons are factual, sound and convincing. Similarly, it is overwhelmingly believed that the Memorandum of Understanding being negotiated by the City and County for "joint vision" is an unenforceable document offering the flood plain no protection from almost certain development if Elk Grove were to annex it.

Real leadership has appeared at the City Council for the first time in recent memory, with Councilman Davis' proposal that Elk Grove drop the flood plain from their SOI. Councilman Hume, predictably, opposes it. The other three Council members ride the fence, testing the wind and thinking hard about how to weigh in at the April 14 City Council meeting. Are they listening? Do they care?

The inclusion of the Cosumnes River flood plain in the Elk Grove's SOI has been shown, beyond any reasonable doubt and through the City's own listening sessions, to have been a bad idea. That can be easily fixed by voting to remove it, and the Council can once more turn its energies and resources toward resolving the City's other pressing issues.

The spotlight will be hard-focused on Elk Grove's five City Council members on April 14. The case for dropping the flood plain from the SOI has been solidly made, and at the City's own request. The case for keeping it in is transparently questionable at best. At the end of the day it will be very clear which Council members "listened", and which did not. I would guess that Elk Grove's reputation and more than one political career hangs in the balance.

Wayne Gallup,

Wilton

Wilton IS a good place to be. Elk Grove thinks so, too.

Bill Kutzer

www.wiltonactiongroup.org

916-687-7542

kutzerb@frontiernet.net

The Cosumnes River flood plain should be dropped from Elk Grove's SOI. What may have been a good idea to ex-Councilman Leary and is currently championed by ex-Mayor Hume, has become the center of a firestorm of opposition by the Community of Wilton and the general public.

Elk Grove has not been able to justify WHY they need the flood plain. The highly-touted "listening sessions" have only generated public anger because they appear to be a time-wasting shell game....without the pea. Staff takes the heat and writes copious notes which disappear into the Ivory Tower of the City Council, while County representatives look uneasy and do little else.

It is time for real leadership to emerge in Elk Grove. Drop the flood plain from the SOI, save money being wasted on an unnecessary war, mend fences, and get on with the City's important business. We can start liking each other again, and go back to what we'd all rather be doing anyhow.

Wayne Gallup,

Wilton

Thorpe. Diane

From: Bill Kutzer [kutzerb@frontiernet.net]
Sent: Thursday, March 18, 2010 5:17 AM
To: Sherry. Robert (MSA); Hazen Don
Cc: Gary - Davis; Scherman, Sophia; Detrick Steve; Cooper Jim; Hume Pat; Gill Laura; Echiburu Taro; Clerk of the Board; Commission. Clerk; Gougherty Dan; Kalb Loretta; Sill Melanie; Lewis Mary; Soto Fran; Matthew Baker
Subject: Wilton Action Group: E-Blast 4--MOU

Hi Don and Rob,

enclosed and attached is an E-blast that we believe, once again, emphasizes the facts why it is not necessary to include the floodplain within the amended Elk Grove SOI.

Bill

WHY ELK GROVE CAN AND SHOULD REMOVE THE FLOODPLAIN FROM THE SOI

The "listening sessions" on the Draft MOU between Elk Grove and the County are drawing to a close. The Wilton Action Group and many others have demanded that the existing Cosumnes River/Deer Creek floodplain be removed from the SOI. Elk Grove and a handful of others have argued that the floodplain should remain in the SOI to avoid hardships to landowners, prevent unwanted development by the County, and encourage regional trail and open space connections. WAG proposes that these issues be addressed in the MOU so that the City can remove the floodplain from the SOI and focus on its core mission of providing urban services. Here's how:

Concern raised by the City: Adopting an SOI boundary that divides the long, thin agricultural parcels that straddle the USB line will disadvantage the landowners because the County might not cooperate in the development approval process.

WAG's response: New language should be added to the MOU committing the County to fully cooperate with the City in anticipating and accommodating development inside the USB/SOI boundary east of Highway 99. This would ensure that landowners are treated fairly if they decide to split their parcels and annex the portion within the USB into the City. **Thus, the inclusion of the floodplain in the SOI is not needed as a protective measure.**

Concern raised by the City: Elk Grove needs to protect the floodplain from unwanted development by the County.

WAG's response: The City has secured language in the MOU protecting the floodplain area including a provision in the Joint Policy Vision stating that "neither jurisdiction will pursue urban land uses outside the [USB] without agreement of the other party." **Thus, inclusion of the floodplain in the SOI is not needed as a protective measure.**

Concern raised by the City: Elk Grove wants a regional trail/open space system that connects the City to existing trails in the region.

WAG's response: The MOU contains language encouraging such connections. The Joint Policy Vision specifically states that "a County objective is...creating a regional trail system. The City and County agree to coordinate any public access proposal with this trail vision, as well as with existing open space programs and the City's Trails Master Plan." **This provision addresses the City's open space and trails objective without having**

3/30/2010

to extend the SOI into the floodplain.

With the proposed revisions to the MOU, Elk Grove will have no reason to extend the SOI into the floodplain. Instead, the City can concentrate on its core urban service functions and leave the County to continue to provide agricultural and open space support services in the floodplain area. This would be consistent with the historic division of responsibilities between the City and County and with the County's role as the lead agency for the regional South County Habitat Conservation Plan.

Bill Kutzer
www.wiltonactiongroup.org
916-687-7542
kutzerb@frontiernet.net

Lockhart. Don

From: Diane Thorpe [Diane.Thorpe@SacLAFCO.org]
Sent: Thursday, March 11, 2010 7:40 AM
To: Lockhart. Don; Brundage. Peter
Subject: FW: Cosumnes River Floodplain

Have a great day,

Diane Thorpe

Sacramento LAFCo
1112 I Street, Suite 100
Sacramento, CA 95814-2836
Diane.Thorpe@saclafco.org
phone 874-2935
fax 854-9097

From: Clerk of the Board
Sent: Wednesday, March 10, 2010 3:46 PM
To: Thorpe. Diane
Subject: FW: Cosumnes River Floodplain

**Board of Supervisors
Sacramento County
700 H Street, Suite 2450
Sacramento CA 95814
874-8175
874-7593 Fax**

From: Michael Mayer-Kielmann [mailto:michael6@cwnet.com]
Sent: Wednesday, March 10, 2010 3:24 PM
To: Commission. Clerk
Cc: Clerk of the Board; lkalb@sacbee.com; msill@sacbee.com; mlewis@herburger.net;
elkgrovenews@yahoo.com; rvt@herburger.net; senator.cox@sen.ca.gov; senator.steinberg@sen.ca.gov
Subject: Cosumnes River Floodplain

Dear Ms Thorpe,

Please forward this letter to all SacLAFCo Commissioners and Alternate Commissioners. Thank you.

To the Commissioners and Alternate Commissioners of the Sacramento Local Agency Formation Commission:

This letter is written to solicit your support for the permanent protection of the Cosumnes River/Deer Creek floodplain and to protest its inclusion in the proposed expansion of the sphere of influence (SOI) submitted by the City of Elk Grove. My objection is based on the following concerns:

1. Elk Grove expansion threatens Wilton residents with increased flooding during wet years. Precisely this happened in the Laguna area several years ago when Elk Grove developed in a "no develop" area of the Laguna floodplain.

3/11/2010

2. Elk Grove expansion that includes the floodplain threatens riparian habitat in the existing 100-year Cosumnes River/Deer Creek floodplain.
3. For over 4000 Wilton residents, taxpayers and landowners, Elk Grove expansion into the floodplain is in our backyard and a threat to our existing rural lifestyle.
4. The Cosumnes River Basin and the existing 100-year Cosumnes River/Deer Creek floodplain is a critical groundwater re-charge area. The re-charge capabilities of the floodplain took centuries to evolve and should not be put at risk. It needs to be protected by removing all doubt as to what will happen to the floodplain - it should be removed from the SOI, period.
5. The SOI is an instrument for urban development and orderly introduction of urban services. The City of Elk Grove is ill-prepared to monitor open space and agricultural lands. The floodplain, in Elk Grove's own words, should not be developed. Therefore, there is absolutely no reason for its inclusion within the SOI. The floodplain is being managed quite well under the current jurisdiction of the County.

To date, the City of Elk Grove has attempted to assuage concerns over the floodplain by preparing a Draft Memorandum Of Understanding (MOU) as an addendum to the SOI. Unfortunately, this MOU is woefully inadequate in clearly stating the mechanisms for permanent protection of the floodplain, and has therefore no lasting value as a guarantee of protection of the 100-year floodplain.

Wilton is a rural community and its residents would like to keep it that way. Expansion by the City of Elk Grove into the Cosumnes River/Deer Creek floodplain threatens us with increased flooding, will likely affect our groundwater, and will probably destroy precious wildlife habitat. The SOI itself is poorly justified with many unanswered questions, and there is insufficient specificity in the draft MOU to guarantee the lasting preservation of the floodplain. The only way to protect the floodplain and Cosumnes River Basin habitat is to simply remove the floodplain from the SOI request.

Thank you for your attention to this matter of great concern to many Wilton residents. Please assert your influence on this issue to ensure that the Cosumnes River floodplain is removed from the Elk Grove SOI request.

Very respectfully yours,

Michael Mayer-Kielmann
Wilton, CA 95693

Lockhart, Don

From: Bobbie Winn [bwinn@dfg.ca.gov]
Sent: Tuesday, March 09, 2010 2:21 PM
To: Commission. Clerk
Cc: kutzerb@frontiernet.net; mlewis@herburger.net; lkalb@sacbee.com; msill@sacbee.com; Clerk of the Board; senator.cox@sen.ca.gov; senator.steinberg@sen.ca.gov; elkgrovenews@yahoo.com
Subject: Letter concerning Elk Grove's SOI and MOU

March 9, 2010

To: LAFCO Commissioners;

Reference: The City of Elk Grove's proposed expansion of its Sphere of Influence (SOI) and the Memorandum of Understanding (MOU) between the County of Sacramento and the City of Elk Grove.

As stated in EXHIBIT "B" of the City of Elk Grove –County of Sacramento Joint Policy Vision for the Cosumnes River Basin, the Cosumnes River and its flood plain are and important resource to the Sacramento Region. The emphasis should be on the word Region. The health and the well being of the Cosumnes River Basin have influence far beyond the City of Elk Grove. It provides for water recharge that impacts a large area of the south Sacramento County and has attributes that contribute to health of the Delta which is significant to the whole state. As wetlands it provides important flood control for all within the region. It provides habitat for wildlife whose well being is the charge of state and federal agencies. Placing the jurisdiction of policy and ultimate decision making (provided by the SOI and ultimate annexation) in the hands a small select urban body seems inconsistent with the value this resource has for both humans and wildlife not only in the region but within the state.

I am concerned that the Joint Policy Vision has no provision for Transitional Land Uses east of Highway 99 and south of Grantline Road. There is noted recognition of need for a compatible interface west of 99. Apparently there will be no conflict with Urbanization right up to the flood plain that is designated both agriculture and open space. Planners need to tell that to the mother who fears for her child or the owners whose dogs and cats provided dinner for mountain lions and coyotes. Human wildlife encounters have increased through out the state as urbanization has push back and infringed upon wildlife corridors and critical habitat as exemplified by the Cosumnes River Basin and flood plain area.

Other urban areas with groped with transitional land issues. The overwhelming results show the idea of being next to agriculture or a

wildlife corridor are what fairytales are made about but in real life the liabilities far exceed the assets. People are not tolerant of many of the farming practices that make agriculture economically feasible. People do not abide by the "Keep Wildlife Wild" campaign from the Department of Fish and Game and the result is the farmer and the animal loses!

Transitional land use needs to be configured with less population density. The idea of a 2 acre zone seems to indicate one resident per 2 acres however state law allows each main resident the right to construct an accessory dwelling resulting in 2 residences per 2 acres. Effective transitional parcels should be 5 acres resulting in a maximum density of one residence for 2.5 acres.

In the Vision Policy it stating that development with in the flood plan is unacceptable, this is a contradiction to what is allowed within FEMA regulations. Building in the floodplain is permitted provided the finished floor is a certain height above the 100 year flood level and is certified with a flood certificate. I submit that the words in #6 are simply smoke and mirrors, a diversion tactic trying to appease those in opposition. There is no provision that would prevent mitigation to circumvent restrictions. This section addresses planning activities only and we all know that planning policies can be changed. Remember money is "green". Also the statement - "The City and the County agree that alteration of the floodplain to facilitate URBAN development shall be strictly prohibited." As long as the development is not termed URBAN is alteration o.k.?

There is no guarantee that any governing body will preserve or protect the resources provided within the Cosumnes River Basin but all who are effected by and benefit from those resources should always have a voice in any decisions made that influence this area and their ultimate quality of life. This will nSOI and control of it is in the hands of the City of Elk Grove. The Sacramento Region will lose one of its important resources. A resource which provides benefits that reach far beyond it boundaries.

Thank you for your consideration.

Respectfully,

Bobbie Winn

13118 Apple Rd.

Wilton, CA 95693

Email: b_winn@frontier.com

Bobbie Winn
Department of Fish and Game
Project WILD Coordinator
1807 13th Street, Room 104
Sacramento, CA 95811

916/322-8974
bwinn@dfg.ca.gov

Lockhart. Don

From: tina holt [holtart4u@yahoo.com]
Sent: Monday, March 08, 2010 8:04 AM
To: Commission. Clerk
Subject: Elk Grove SOI

Tina Holt
11655 Clay Station Rd.
Herald Ca 95638

RE: Elk Grove SOI

Hello,

I am writing to express my concern over the application for expansion of the Elk Grove Sphere of Influence pertaining to the new proposed boundary line crossing the Cosumnes River and making the Cosumnes Flood Plain under City of Elk Grove control.

The City of Elk Grove has swelled in its size and the capacity to control anything other than it's current problems, crime, home foreclosures, impending blight of previous build-out that has not come to fruition as has been speculated.

The City of Elk Grove presentation at the March 3rd meeting proposed the need for more lands with its Sphere application; I believe that the City of Elk Grove planners, "who by the way are being pressured by the Developers who own land in the contested Flood Plain", presumes much in its forecast for growth. The loud voices that I have heard in protest to the Cosumnes Flood Plain being included in the mapping of the Elk Grove Sphere of Influence make just one request; "Redraw the Boundary to reflect no Flood Plain".

Just saying that it is agreed that Development should not occur is not good enough.

Do not cross Grantline Rd/ Kammerer Rd.

I thank you for allowing me to submit my comments and opinions to you.

Very Truly,
Tina Holt

Thorpe. Diane

From: boswell9@frontiernet.net
Sent: Thursday, January 28, 2010 2:36 PM
To: Clerk of the Board; Commission. Clerk
Cc: SACBEE; VPSACBEE; EGCITIZEN
Subject: City of Elk Grove SOI Application

The reason I am sending you this email is to make you aware of our concerns regarding the City of Elk Grove's Sphere of Influence (SOI) application relative to the disposition of the Cosumnes River floodplain which includes a crucial choke point location of the Cosumnes River Floodplain

“New development” is listed as a frequent cause of flooding on the Floodsmart.gov website. Urban development in the proposed SOI east of State Route 99 is in a location which will likely amplify flooding effects for existing property owners upstream of the SOI incursion into the floodplain.

The purpose for an SOI request is to establish the boundary for future urban development. Given the way City of Elk Grove has ignored the previous Urban Services Boundary and filed the SOI application that leaps over that boundary there is every reason to believe that, with or without an MOU, annexation and urbanization of the area included within the SOI will shortly follow once authority to do so is transferred from the County of Sacramento to the City of Elk Grove.

The ONLY effective way to prevent urbanization of the floodplain is to remove the floodplain area from the SOI application. Please do not allow Elk Grove to include the existing 100 year floodplain of the Cosumnes River in their SOI application!

Your serious consideration of our concerns would be appreciated.

Christine and Dean Boswell
12016 Rising Road
Wilton, CA
916/687-8393

Lockhart. Don

From: BOSWELL9 [BOSWELL9@FRONTIERNET.NET]
Sent: Saturday, March 06, 2010 2:04 PM
To: Commission. Clerk
Subject: Elk Grove Sphere of Influence Application relative to the Cosumnes River Floodplain

This email is to make you aware of our concerns regarding the City of Elk Grove's Sphere of Influence (SOI) application relative to the disposition of the Cosumnes River floodplain which includes a crucial choke point location of the Cosumnes River Floodplain

"New development" is listed as a frequent cause of flooding on the Floodsmart.gov website. Urban development in the proposed SOI east of State Route 99 is in a location which will likely amplify flooding effects for existing property owners upstream of the SOI incursion into the floodplain.

The purpose for an SOI request is to establish the boundary for future urban development. Given the way City of Elk Grove has ignored the previous Urban Services Boundary and filed the SOI application that leaps over that boundary there is every reason to believe that, with or without an MOU, annexation and urbanization of the area included within the SOI will shortly follow once authority to do so is transferred from the County of Sacramento to the City of Elk Grove.

The ONLY effective way to prevent urbanization of the floodplain is to remove the floodplain area from the SOI application. Please do not allow Elk Grove to include the existing 100 year floodplain of the Cosumnes River in their SOI application!

At the last meeting an attempt by the City/County to present some sort of "joint-vision" Memorandum Of Understanding (MOU) was met with a oneness of voice against the SOI. This majority opinion came through loud and clear from those in the room.

It is our desire that you seriously consider of our concerns. Thank you in advance.

Christine and Dean Boswell
12016 Rising Road
Wilton, CA 95693
(916) 687-8393

Lockhart. Don

From: Doug Williams [douglasewilliams@sbcglobal.net]
Sent: Wednesday, March 10, 2010 3:36 PM
To: Commission. Clerk
Cc: Lulu Williams; Joe Daehling; Alanson Kleinsorge; Bill Mosher; Herb Garms; 'Bob & Faye Krull'; Dale Mahon; George Phillips
Subject: Letter from Landowners in the Eastern Area of Elk Grove's SOI Application

Attachments: EastAreaSOI&MOUletterF.pdf



EastAreaSOI&MOU
letterF.pdf (32...

Dear Ms. Thorpe;

Please forward this letter to all of the LAFCo Commissioners and Alternate Commissioners.

The attached letter from landowners in the Eastern Area of the City's SOI LAFCO Application was mailed to Ms. Gill, the Sacramento County Executive and other relevant officials.

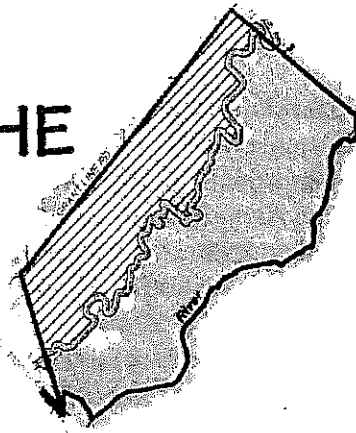
The letter clarifies reasons for maintaining the City Council's current course of action in pursuing the SOI and crafting an appropriate MOU.

As described in the letter, keeping the floodplain area in the City's SOI application will provide the greatest long-term benefits for the environment, the City and all who live and enjoy this area.

If you have any questions or need further clarification, please do not hesitate to contact us.

Douglas E. Williams
721 Ocean Ave.
Richmond, CA 94801
510.235.9353
Fax: 510.232.9546
doug@weldengineers.com
www.weldengineers.com

LANDOWNERS IN THE EASTERN AREA OF ELK GROVE'S SOI APPLICATION



March 8, 2010

City of Elk Grove
8380 Laguna Palms Way, Suite 200
Elk Grove, CA 95758
Attn: Laura S. Gill, City Manager

County of Sacramento
700 H St., Room 7650
Sacramento, CA 95814
Attn: Steven C. Szalay, County Executive

Subject: City of Elk Grove Sphere of Influence (SOI) Submittal to LAFCO
and Draft MOU / Joint Policy Vision for the Cosumnes River Basin
Eastern Area of SOI Submittal

Dear Ms. Gill and Mr. Szalay;

We, the undersigned, own land within Eastern Segment of the City of Elk Grove's current SOI Application to LAFCO. Many of our families have owned and farmed this area for over 100 years and are long-term stewards of the land, including the river, floodplain and upland. We have a vested interest in protecting it. We support the City's application for inclusion of this area within the City's Sphere of Influence, including the land from Grant Line Road to the Cosumnes River. We also support the draft MOU / Joint Policy Vision for the Cosumnes River Basin document, providing the SOI for Elk Grove extends to the Cosumnes River. The basis for our support was described in our previous letter of June 18, 2009.

We have recognized the possibility of urban development for the upland outside of the 100 year floodplain since 1993, when the County of Sacramento defined the Urban Services Boundary (USB) across this area in their General Plan. The County's existing USB is essentially unchanged in the City's SOI application for this area.

Landowners in the Eastern Area of Elk Grove's SOI Application

No Development in Floodplain

Although a number of comments were generated in last year's "Listening Sessions" and in other submittals, the substantive, unique points boiled down to only a few for the Eastern Area of the SOI application. The most significant of these was that the floodplain area not be developed. Although this was stated in the original SOI application, the draft MOU stated this in many places and in no uncertain terms. In fact, the undated letter from Bill Kutzer and the Wilton Action Group (WAG) to Susan Peters ("Re: October 2009 Draft Memorandum of Understanding Between the County of Sacramento and the City of Elk Grove (City) Regarding Elk Grove's Proposed Expansion of its Sphere of Influence") agrees that the principle issues that they had raised were addressed by the MOU / Joint Policy Vision document, even though wish to keep the floodplain in the county.

Mandated Mitigation

The following statements are included in the MOU / Joint Policy Vision document, under Exhibit B Joint Policy Vision / IV Planning Principles:

2. Land Use

Farmland and open space lands within the 100-year flood plan shall be permanently protected. This protection shall be accomplished through buffers and conservation easements. This policy is not intended as a plan for public acquisition of private lands. However, preservation may be viewed as being accomplished by project proponents through the requirement of mitigation land.

5. Farmland

Mitigation for the loss of farmland within the Urbanization Area by permanent preservation (through conservation easements) of existing farmland outside the Urbanization area shall be required for all projects.

6. Flood Plain Protection

"Whenever development is proposed on properties that contain land both within and outside the floodplain, those portions of land within the floodplain shall be placed into a floodplain conservation easement in perpetuity as a condition of project approval."

The document states that the "...policy is not intended as a plan for public acquisition of private lands." Even though it is tied to approval of a development project for the adjacent land that is within the USB, mandating easements is *de facto* acquisition. As property owners in the affected area, we advocated for this provision under the assumption that the City would be the single entity responsible for project approval. We would not accept this condition if the floodplain portion of the same parcel was in the county, as clarified below.

- We have long envisioned that the development of the area within the USB be accompanied by a comprehensive plan to procure, protect, preserve, enhance and maintain the floodplain area. The county is not able to fund this effort.
- If the floodplain area is used as mitigation to offset development within the USB, the developer will provide all of the costs associated with procuring, protecting, preserving, enhancing and maintaining the floodplain area. The county cannot provide this leverage if the developable land is not within their jurisdiction.
- Planning of the floodplain conservation area can be done comprehensively for large tracts if done in conjunction with a development project.

Landowners in the Eastern Area of Elk Grove's SOI Application

- Land moved into conservation easements must include initial funding for habitat restoration and creation and ongoing funding for maintenance. This is best done by the agency controlling development as a comprehensive whole, not piecemeal between the city and county.
- Note that land moved into mitigation is controlled by the Implementing Entity (i.e., the conservation easement and/or land holder), not by the agency with jurisdiction (i.e., city or county).
- The county does not currently provide adequate police and other services to the area. This will become worse if only the floodplain area is in county jurisdiction because it will be even more isolated.
- Approval of a development project for the area within the USB must satisfy many requirements from various agencies. However, the complexity is too great to spread between the separate city and county planning departments. Not only is it inefficient, it is unfair because it is an unusual hardship burden.

"Runaway Real Estate Speculation"

Although most of the May 22, 2009 ECOS letter addresses other land areas of the SOI application, one interesting fallacy should be noted. The second bullet point under "Basis for Concern" suggests that approval of the SOI would "...trigger runaway real estate speculation...which would escalate the cost of acquiring conservation easements to mitigate for development within the USB." With the entire Eastern area to the Cosumnes River within Elk Grove's SOI and with the wording of the MOU as stated above, it is not necessary to artificially suppress land values in order to obtain mitigation land. Of the total Eastern area of the SOI application, well over 50% (more than 1500 acres) would be set aside assuming that all of developable land was developed. This is at no cost to the city or county because it is provided by the development. Note also that it is very unlikely that protection of such acreage would be possible within the framework of the South Sacramento Habitat Conservation Plan (SSHCP), where the funding is unknown, and acquisition is based on the optimistic 'willing seller-willing buyer' premise.

Summary

As noted above, we also recognize and fully support the prohibition of urban development outside of the USB and within the 100-yr. floodplain of the Cosumnes River including Deer Creek. This is clearly reflected in the SOI application and even more clearly stated in the draft MOU/Joint Policy Vision for the Cosumnes River Basin document. With these documents, LAFCo should approve Elk Grove's SOI application for this area.

Your careful consideration of the above points is appreciated.

Respectfully submitted;

Landowners in the Eastern Area of Elk Grove's SOI Application

ADDRESS /RANCH / APN #	NAME	SIGNATURE
Kleinsorge Ranch 134-0130-010 134-0130-012 134-0120-002	Louise K. Williams Douglas E. Williams Alanson Kleinsorge	<i>Louise K. Williams</i> <i>Douglas E. Williams</i> <i>Alanson K. Kleinsorge</i>
Daehling Ranch 134-0190-001	134-0190-001 JOE Daehling June Daehling	<i>Joe Daehling</i> <i>June Daehling</i>
Windmill Ranch 134-0120-014 134-0120-019	Dale W. Mahon	<i>Dale W. Mahon</i>
Moshier Ranch 134-0190-002 302 ac.	William A. Moshier Ouida K. Garms HERB A. GARMS	<i>William A. Moshier</i> <i>Ouida K. Garms</i> <i>Herb A. Garms</i>

Cc: Elk Grove City Council Members
 Sacramento County Board of Supervisors Members
 Sacramento County LAFCO members
 Don Hazen, Planning Director, Elk Grove
 Robert Sherry, Planning Director, Sacramento County
 Peter Brundage, Executive Director, Sacramento Area Council of Governments

Thorpe. Diane

From: Erica Strack [strack33@yahoo.com]
Sent: Thursday, March 11, 2010 9:21 PM
To: Commission. Clerk
Subject: Elk Grove's SOI

I would like to request that commission clerk, Diane Thorpe, forward this letter to all of the Commissioners and the Alternate Commissioners:

I would like to address some concerns with Elk Grove's proposed SOI into the Cosumnes River area of South Sacramento County. As a new citizen of Elk Grove with strong roots in the Wilton community, Elk Grove's SOI is quite unnerving. I have lived in the Wilton and Elk Grove communities all my life. I can remember the days when Elk Grove Blvd was a two-lane road from Grantline Road to I-5, traffic was something that happened during homecoming parades, and there was care for the community and the surrounding areas.

In the last couple years this vision has ebbed to a point of non-existence. The City Council of Elk Grove has continually fought for a Sphere of Influence that would include the floodplain along the Cosumnes River. I have been to multiple meetings and read many articles on the ones I have missed and the only thing I can say is City Council is not giving answers. The simple question is WHY? Why does the city need more land close to a floodplain? What is the purpose of broadening the borders of the city into an area that is environmentally unique? What services could the city possibly offer that would better the area for later generations? Why does the city want this land? The City Council has continued to refuse answers to these questions, and simply says that they have no plan for the area at this time. Then why does Elk Grove need it? Short answer: they don't.

In Elk Grove's almost decade-long life as a city nothing has been done to curb the havoc reigned on the environment, as development after development has eaten away at the once plentiful rural land. Not only have these developments taken away from the small town appeal of the area, but the expense to the environment and the livelihood of many small businesses in the area have been taken over as well.

I feel that the floodplain should be left out of any expansion efforts of Elk Grove for the natural, environmental, and financial benefit of the area. The City of Elk Grove should focus on the lands they have now and the problems they have in the area they already inhabit instead of spreading further. Questions of water, education, and transportation should be firmly under control before any expansion should even be thought of. One question no one is asking is how much is this SOI process costing? An environmental impact report must be made, and goodness forbid they actually receive this land in their jurisdiction - how will Elk Grove manage a floodplain and the natural disasters that brings on an ecologically regular basis?

I highly urge you to not allow the floodplain as part of Elk Grove's SOI to ensure the natural beauty and uniqueness of this area. Thank you.

Sincerely,
Erica Bainter
Elk Grove, CA

3/30/2010

Thorpe, Diane

From: susiemail2 susiemail2 [susiemail2@isp.com]
Sent: Thursday, January 28, 2010 6:58 PM
To: Commission. Clerk
Cc: lkalb@sacbee.com; msill@sacbee.com; mlewis@herburger.net
Subject: Elk Grove SOI request

Diane Thorpe, commission clerk, please forward my letter to All of the Commissioners and the Alternate Commissioners. Thank You.

Having lived in Wilton for 40+ years I have watched a lot of growth in both Wilton and Elk Grove areas. Elk Grove has had nothing but growth in the area of new home building and shopping centers. I have not seen any land specifically set aside for rural small or large farming, in fact the idea of a green zone to differentiate Elk Grove from Sacramento seems to have disappeared as well.

With this history staring us in the face, I see the current Sphere of Influence request as a great danger to the flood plain area east of State Route 99. I strongly believe that if Elk Grove includes this 100 year floodplain of the Cosumnes River in their sphere of influence it will become homes as quickly as the economy will allow. This is a danger to the people of Wilton and the surrounding areas as flooding will affect the whole area both north and south of the area in question.

I do not see the City of Elk Grove being a good custodian of the area. Their track record is miserable. The way I see to prevent urbanization of the floodplain is to remove the floodplain area from the SOI application. Please do not allow Elk Grove to include the existing 100 year floodplain of the Cosumnes River in their SOI application.

Sincerely,
Susan S. deMars
9721 Alta Mesa Rd.
Wilton, CA 95693

3/30/2010

Thorpe. Diane

From: Clerk of the Board
Sent: Monday, March 22, 2010 3:51 PM
To: Thorpe. Diane
Subject: FW: Elk Grove SOI

**Board of Supervisors
Sacramento County
700 H Street, Suite 2450
Sacramento CA 95814
874-8175
874-7593 Fax**

From: Robert Foiles [mailto:bfoiles@frontiernet.net]
Sent: Monday, March 22, 2010 2:43 PM
To: Clerk of the Board
Subject: Elk Grove SOI

We strongly oppose Elk Grove's SOI. They can't manage what they have now and it would be a huge mistake to have them in the flood plain. Look at all the building they have done in the flood plain in the Laguna area. They and all the residents of Laguna are courting disaster.

Cyndi Lee please forward our email to all the Supervisors.

Thanks, Robert H. Foiles, Darlene M. Foiles, and Robert F. Foiles of Wilton, CA.

3/30/2010

Lockhart. Don

From: Michael Mayer-Kielmann [michael6@cwnet.com]
Sent: Wednesday, March 10, 2010 3:24 PM
To: Commission. Clerk
Cc: Clerk of the Board; lkalb@sacbee.com; msill@sacbee.com; mlewis@herburger.net; elkgrovenews@yahoo.com; rvt@herburger.net; senator.cox@sen.ca.gov; senator.steinberg@sen.ca.gov
Subject: Cosumnes River Floodplain

Dear Ms Thorpe,

Please forward this letter to all SacLAFCo Commissioners and Alternate Commissioners. Thank you.

To the Commissioners and Alternate Commissioners of the Sacramento Local Agency Formation Commission:

This letter is written to solicit your support for the permanent protection of the Cosumnes River/Deer Creek floodplain and to protest its inclusion in the proposed expansion of the sphere of influence (SOI) submitted by the City of Elk Grove. My objection is based on the following concerns:

1. Elk Grove expansion threatens Wilton residents with increased flooding during wet years. Precisely this happened in the Laguna area several years ago when Elk Grove developed in a "no develop" area of the Laguna floodplain.
2. Elk Grove expansion that includes the floodplain threatens riparian habitat in the existing 100-year Cosumnes River/Deer Creek floodplain.
3. For over 4000 Wilton residents, taxpayers and landowners, Elk Grove expansion into the floodplain is in our backyard and a threat to our existing rural lifestyle.
4. The Cosumnes River Basin and the existing 100-year Cosumnes River/Deer Creek floodplain is a critical groundwater recharge area. The re-charge capabilities of the floodplain took centuries to evolve and should not be put at risk. It needs to be protected by removing all doubt as to what will happen to the floodplain - it should be removed from the SOI, period.
5. The SOI is an instrument for urban development and orderly introduction of urban services. The City of Elk Grove is ill-prepared to monitor open space and agricultural lands. The floodplain, in Elk Grove's own words, should not be developed. Therefore, there is absolutely no reason for its inclusion within the SOI. The floodplain is being managed quite well under the current jurisdiction of the County.

To date, the City of Elk Grove has attempted to assuage concerns over the floodplain by preparing a Draft Memorandum Of Understanding (MOU) as an addendum to the SOI. Unfortunately, this MOU is woefully inadequate in clearly stating the mechanisms for permanent protection of the floodplain, and has therefore no lasting value as a guarantee of protection of the 100-year floodplain.

Wilton is a rural community and its residents would like to keep it that way. Expansion by the City of Elk Grove into the Cosumnes River/Deer Creek floodplain threatens us with increased flooding, will likely affect our groundwater, and will probably destroy precious wildlife habitat. The SOI itself is poorly justified with many unanswered questions, and there is insufficient specificity in the draft MOU to guarantee the lasting preservation of the floodplain. The only way to protect the floodplain and Cosumnes River Basin habitat is to simply remove the floodplain from the SOI request.

Thank you for your attention to this matter of great concern to many Wilton residents. Please assert your influence on this issue to ensure that the Cosumnes River floodplain is removed from the Elk Grove SOI request.

Very respectfully yours,

Michael Mayer-Kielmann
Wilton, CA 95693

3/11/2010

Thorpe. Diane

From: RosaRancho [rosarancho@frontiernet.net]
Sent: Thursday, April 01, 2010 11:10 AM
To: Commission. Clerk
Cc: Elk Grove News; Clerk of the Board; Loretta Kalp; msill@sacbee.com; Mary Lewis; assemblymember.huber@assembly.ca.gov; assemblymember.buchanan@asm.ca.gov; senator.cox@sen.ca.gov
Subject: City of Elk Grove Sphere of Influence/Memorandum of Understanding

The last of the Memorandum of Understanding "Listening Sessions" was held at Elk Grove City Hall Chambers on March 31st. Most was a recap of information provided; however, some jewels of information were presented which are worth repeating.

The MOU was discussed as to its enforcement and potential as a guarantee of compliance by the two endorsee's (City of Elk Grove and County of Sacramento):

- 1) The document is "an understanding" between the County of Sacramento and the City of Elk Grove.
- 2) Changes can occur to the original document as long as the two parties (Sacramento County and the City of Elk Grove) agree.
- 3) Either party (County of Sacramento/City of Elk Grove), or both, can opt out of the "Understanding" at any time.
- 4) The document is "not legally binding".

Previous "listening sessions" related to the Sphere of Influence revealed that:

- 1) The City of Elk Grove's request related to the Sphere of Influence

Application is to assist in planning for "future growth" as related to the City of Elk Grove.

- 2) Land use planning is for projected growth needs related to 10, 20, 30, 40, & 50 years in the future.

Land owners within the Cosumnes River Flood Plain in support of the "SOI & MOU":

- 1) Desire to have their properties under one jurisdiction....City of Elk Grove.
- 2) Families/owners have farmed the area for many years (generations) and have a proven track record of being "good stewards" of the land as demonstrated by the Basin remaining unchanged.
- 3) Have no interest in development of their properties.

Constituents of both the City of Elk Grove and the County of Sacramento in opposition to the SOI/MOU as related to the Cosumnes River/Deer Creek Flood Plain:

- 1) The MOU is unenforceable.

) The County is better equipped in dealing with Agricultural Issues as they not only have an Agricultural Dept but also have a history of working with Agricultural interests.

) The Cosumnes River/Deer Creek Flood Plain will do nothing to assist in the planning for future growth, based on the City of Elk Grove's own statement that "there is no interest in urban development within the Flood Plain".

) The City of Elk Grove currently has over 8,000 acres of undeveloped land within it's City boundaries in addition to a number of homes vacated due to foreclosure actions. Also a number of "store fronts" are vacant and the number appears to be growing. Also a mis-step in the "Grand Mall" which stands incomplete and appears lacking in prospects for resurrection.

) The City of Elk Grove has a history of poor planning. Approved zoning can and has changed at the City Council Level.

The Bottom Line:

) The MOU is not worth the paper it is written on.

) Although sincere, current large property owners, cannot guarantee that "heirs of large parcels of property" will have the same commitment as that demonstrated by original property owners.

) Inclusion of the Cosumnes River/Deer Creek Flood Plain in the application of the City of Elk Groves Sphere of Influence/Memorandum of Understanding will do nothing to address needs to plan for population growth based on their own admission.

) A more accurate statement by the Current Elk Grove City Council should be that with regards to the Flood Plain there will be "no development on their watch". The current City Council may very well be satisfied if they can "open the door" to future development within the Flood Plain.....remember that they need to plan for 30, 40, 50 years out.

Most individuals in opposition to the current SOI/MOU, as related to the Cosumnes River/Deer Creek Flood Plain, are sincerely concerned over any alteration of the area in future years (whether it be 5, 10, 20, 30, 40, 50 years) and the effects those changes will have on the quality of life for future generations.

Please give a little of your precious time and attend the Rally set for April 14, 2010 at 5:00 p.m. at Elk Grove City Hall and demonstrate your concern for the future of Cosumnes River/Deer Creek Flood Plain and how any changes to this unique and sensitive natural area will in fact have tremendous impact on future generations.

Eugene Rose

rosarancho@frontiernet.net

916) 687-5349

2217 Keating Rd.

Vilton, California 95693

4/1/2010