



ECOS
ENVIRONMENTAL
♦ COUNCIL ♦
OF SACRAMENTO

909 12th Street, Suite 100 • Sacramento, CA • 95814 • (916) 444-0022

September 17, 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: LAFCo Consideration of Greenbriar SOI, EIR, Municipal Services Review, etc.

Dear Chairman Rose and Mr. Brundage,

In a letter dated September 11, 2007, the Environmental Council of Sacramento (ECOS) requested that consideration of the proposed sphere of influence (SOI), Municipal Services review, and certification of the Environmental Impact Report (EIR) for the Greenbriar project be continued until a regularly scheduled meeting of the Sacramento County LAFCo. ECOS is submitting these additional comments to reiterate its request for an extension, and to comment on the merits of the proposal.

I. Consideration of the Proposal Should be Continued

As indicated in our earlier letter, LAFCo's consideration of this matter at a special meeting results in a scheduling conflict that ECOS sought to avoid when it modified its board and committee meeting schedule to avoid conflicts with LAFCo's regularly scheduled meetings. Given the importance of this project, it should be scheduled for consideration at a regularly scheduled LAFCo meeting, to allow maximum public participation.

There are additional reasons the matter should be continued. As of Sunday, September 16, 2007, no detailed staff recommendation or proposed conditions of approval have been posted. The purposes of a LAFCo include discouraging urban sprawl and preserving open-space and prime agricultural lands. LAFCo has not adopted a general policy on these issues. In the absence of a general policy, each individual case is important. In practical effect policy is being set on a case-by-case basis, requiring that greater attention be given to the consequences and appropriate conditions of each approval. This requires that more time be available for review of proposed sphere of influence expansions than would be the case if there were a policy in place to provide a framework for when approval is appropriate and what conditions should be imposed.

No compelling reason has been offered why this project needs to be considered at a special meeting, let alone why it should be considered before other proposals for development in the area that contribute cumulatively to the loss of open space and agricultural lands, loss of endangered species habitat, and contribution to flood risk that this project entails.

ECOS urges LAFCo to continue its consideration of this matter until a regularly scheduled board meeting.

II. LAFCo Should Not Approve the Greenbriar Project

On the merits of the proposed sphere of influence (SOI), Municipal Services review, and certification of the Environmental Impact Report (EIR), ECOS has reviewed the comments of the Sierra Club and Friends of the Swainson's Hawk and incorporates those comments by reference. ECOS makes these additional comments.

A. Discouraging Sprawl and Preserving Open Space

As discussed above, the purposes of LAFCo include discouraging urban sprawl and preserving open space and agricultural lands. In the absence of a LAFCo policy on preserving open space and agricultural lands, the most important policy in Sacramento County on these issues is the County's Urban Services Boundary. The Greenbriar project, which is outside the Urban Services Boundary, is inconsistent with that policy.

It would be best to postpone consideration of any project that would result in urban development of open space and agricultural lands until LAFCo develops a comprehensive policy on these issues. It is particularly inappropriate to consider or approve a project of this magnitude that is outside the Urban Services Boundary when LAFCo has no policy of its own to address these issues.

B. Flooding

As indicated in ECOS's earlier letter requesting a continuance, recently enacted state legislation intended to ensure that flood risks are properly taken into account in planning for development in the Central Valley will not have any effect on pending projects. While the new planning requirements will not apply, the flood risks are the same. To properly address these risks, LAFCo needs its own policy to address projects proposed before the new requirements take effect. Otherwise, the new requirements are likely to be undermined, and many residents will unnecessarily be put at risk by projects approved before the new requirements are in place.

ECOS has adopted a resolution on the Natomas Basin flood hazard calling for a moratorium on approval or construction of residential, industrial and commercial development in the Natomas Basin, except for certain infill development, until all of the levees protecting the Natomas Basin are upgraded to provide full protection from flooding. Consistent with this resolution, ECOS urges LAFCo not to consider approving the Greenbriar project or similar projects until adequate flood protection is in place. Protection against the 100-year flood comes well short of adequate flood protection for urban development, yet the Greenbriar project is in an area that lacks even that level of protection.

C. Transit Operations Funding

In addition to discouraging urban sprawl and preserving open space and agricultural lands, the purposes of LAFCo include facilitating the efficient provision of government services. If LAFCo considers approval of the Greenbriar project, ECOS urges full consideration of the issue of adequate funding for transit services.

One of the arguments made in support of the project is that it will make available federal funding to build light rail to the airport. As indicated in the comments of the Sierra Club and Friends of the Swainson's Hawk, this claim is unsubstantiated. The need for light rail to the airport is questionable. Given the low ridership for the current express bus service to the airport, and given that a light rail ride to the airport will take much longer than an express bus, other light rail routes obviously merit a higher priority for the limited funding available for light rail construction in the Sacramento area. The Environmental Impact Report states, incorrectly, that the Greenbriar project is unique in that it offers opportunity for development next to light rail. Aside from the fact that the Downtown-Natomas-Airport light rail line will not be constructed anytime soon, there are areas near light rail stations on the proposed Cosumnes route that provide opportunities for transit-oriented development, not to mention abundant opportunities for redevelopment along existing light rail lines.

The larger issue concerns funding for transit operations and maintenance as funds for transit construction are much easier to obtain than are funds for transit operations. The new Sacramento International Airport master plan provides for over ten thousand new parking spaces, but no money for transit operations, even though funding transit operations would be an obvious way to mitigate the airport's impacts on traffic and air quality. While the County of Sacramento may see symbolic value in light rail to the airport, the County's refusal to contribute anything to transit operations leaves no doubt as to the County's priorities. Parking revenues take precedence over transit. Unless and until those priorities change, there is simply no hope of sufficient ridership to support either light rail or even bus service to the airport.

If LAFCo considers approval of the Greenbriar project, and if LAFCo takes seriously the claim that the Greenbriar project will promote light rail construction, LAFCo needs to take a hard look at the issue of how transit operations will be financed. This should include adoption of conditions to ensure adequate funding for transit operations. In particular, any approval should precondition construction on adequate assurances that both the Greenbriar project and the International Airport contribute sufficient funding to ensure adequate ongoing operations and maintenance funds for transit service to the airport.

LAFCo should take the time necessary to fully evaluate the implications of the Greenbriar project. If it does, LAFCo will recognize that the project should not be approved.

Sincerely,



Andy Sawyer, President
Environmental Council of Sacramento (ECOS)

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