

24 April 2008

**2007-08  
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The Honorable Bonnie Garcia  
California State Assembly  
P.O. Box 942849  
Sacramento, CA 94249-0080

**RE: Oppose AB 2564 – Irrigation Districts**

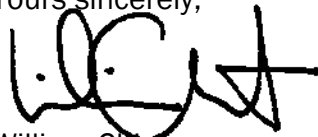
Dear Assembly Member Garcia:

The California Association of Local Agency Formation Commissions opposes AB 2564 which would change Irrigation District Law to prohibit discrimination of certain ratepayers and to require an election to form a utility district under certain circumstances.

The legislation as proposed circumvents the objectives and intent of the Cortese Knox Hertzberg Local Government Reorganization Act of 2000. Under that law the legislature has authorized the local agency formation commissions (LAFCo) to be the conducting authority for changes of organization or reorganization of local agencies, including special districts. Under existing law, each LAFCo has adopted policies and procedures to form or reorganize local agencies. In addition, existing law requires each commission to conduct a Municipal Service Review of each agency every five years. That review includes an examination of rates charged for utility services. This bill appears to affect only the Imperial Irrigation District which provides services in Imperial and Riverside counties. A petition to the Imperial LAFCo, as the principle LAFCo for the district, would be the appropriate course of action for any boundary change or other reorganization.

Because AB 2564 circumvents existing law and would create an inefficient and unnecessarily complex process, CALAFCO must oppose this bill.

Yours sincerely,



William Chiat,  
Executive Director

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c: Members, Assembly Local Government Committee  
Katie Kolitsos, Consultant, Assembly Local Government Committee  
William Weber, Assembly Republican Caucus  
Imperial and Riverside Local Agency Formation Commissions