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December 6, 2016

**Via E-mail: Amy.Dutschke@bia.gov  
and U.S. Mail**

Amy Dutschke  
Regional Director  
United States Department of the Interior  
Bureau of Indian Affairs  
Pacific Regional Office  
2800 Cottage Way  
Sacramento, CA 95825

**Re: Request for Extension of Time to Provide Response to Notice of (Non-Gaming)  
Land Acquisition Application**

Dear Ms. Dutschke:

I am the Town Attorney for the Town of Windsor (the "Town"), which on November 23, 2016 received correspondence from your office requesting comments on the proposed acquisition and specific information in connection with an application from the Lytton Rancheria of California to have 14 specified parcels accepted into trust by the United States. I am writing to request an extension of time in which the Town may respond. The Town respectfully requests the extension for the following reasons:

The Bureau of Indian Affairs (the "Bureau") has asked the Town to provide specific comments related to property taxes, special assessments, government services and zoning and other issues related to the subject property, in order that the Bureau may obtain sufficient data to assist its analysis on the potential impact to local government of the pending Application. In order to provide a complete response, several Town departments must review the pertinent documents and prepare comments.

The Bureau's letter arrived the day before Thanksgiving. Limited staff was available to address the issues in the letter immediately, and the holiday weekend further reduced the time available for staff analysis. Thus the Town lost several days of the period allowed for a response.

Following the receipt of staff comments, the comments must be collected and summarized for review by the Town Council. In order for the Town Council to authorize a response, pursuant to the Ralph M. Brown Act, to which the Town Council is subject, following

compilation of a staff report the matter must be noticed and agendaized for a public meeting of the Town Council. Depending on the direction received from the Town Council at the public meeting, some additional time may be required to finalize the Town's comments before submitting them to the Bureau as requested. In the ordinary course of events, the sheer number of steps and personnel involved in complying with this process would preclude an ability to provide meaningful comment by the current required response date of December 23. However, the timing of a response is further complicated by the fact that December 22 is the last working day before Town offices close, and the offices do not reopen until January 3, 2017. The office closure, reduced staff availability immediately preceding the closure, and the current roster of projects required to be completed before year's end combine to prevent staff from being able to devote the full attention to which the Bureau's letter is entitled.

The Town intends to move as expeditiously as possible in providing a response, but takes seriously its responsibility to review the application and present a final comment letter that reflects an informed assessment of the Application's local impacts by staff, the Town Council, and the public. For that reason we respectfully request one twenty-nine (29)-day extension, to and including Friday, January 20, 2017, in which to provide the Town's response to the Bureau's request.

In order that we may schedule and notice the public meeting(s), I would appreciate it if you could inform me as soon as possible of the Bureau's decision on this extension request. Please feel free to contact me directly at (707) 573-7803 or [rdonoghue@meyersnave.com](mailto:rdonoghue@meyersnave.com) should you have any questions.

Thank you very much for your consideration of this request.

Very truly yours,



Robin Paige Donoghue  
Attorney at Law

RPD:RPD  
c: Linda Kelly, Town Manager  
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