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February 21, 2006

Peter Brundage, Executive Officer
Sacramento Local Agency Formation Commission
1112 I Street, Suite #100
Sacramento, CA 95814

Subject: Comments on the Draft Program Environmental Impact Report for the amendment of the Sphere of Influence for the Sacramento Municipal Utility District (SMUD) and Annexation by SMUD of the Cities of West Sacramento, Davis, and Woodland, and Portions of Unincorporated Areas of Yolo County

Dear Mr. Brundage:

The purpose of this letter is to provide comments on the Draft Program Environmental Impact Report (DEIR) for the subject SMUD annexation. We have reviewed the DEIR and met with SMUD officials regarding our comments on the Notice of Preparation (NOP) sent October 3, 2005. We appreciate SMUD's thorough outreach and diligence in coordinating with the City of Sacramento regarding territories of mutual concern.

The DEIR adequately addressed most of the City's comments on the NOP. The one area of concern is in regards to DEIR Section IX – Land Use and Planning. The following comments relate to the aforementioned section:

Impact LU-1 Physical Division of Established Community

Program Components 4 and 5 are located within existing transmission line rights of way. Therefore, these components will not physically divide an established community. Since there are no established communities in the study areas for Program Components 6 and 7, these components will have no impact on land use/planning with regard to the physical division of a community.

Comment: Though there are no established communities in the study areas for Program Component 6, the City of Sacramento does have an adopted Memorandum of Understanding for the Natomas Joint Vision Area, which contains principles and policies pertaining to future urbanization within this study area.



The impact is correct in stating that no established community would be physically divided, however, there is potential for physical division of a future community based upon the potential for future urbanization within the Sacramento County portion of this study area. If the SMUD annexation is approved the City of Sacramento requests that SMUD consult with the City prior to choosing a specific transmission line route for this study area to ensure no future community is divided.

Impact LU-3: Conflict with Measure M, the Natomas Joint Vision Plan, and the Sacramento International Airport Master Plan

The Woodland-Elverta Transmission Line Study Area (Program Component 6) includes areas covered by Measure M, the Natomas Joint Vision Plan, or the Sacramento International Airport Master Plan. The main objective of the Natomas Joint Vision is to guide urban growth for more efficient use of land, while preserving permanent preservation of open space/farmland. As described in Appendix D of this DEIR, BMP 1 for siting the Woodland-Elverta transmission line will use the criteria provided in Sacramento County zoning ordinance 301-11 and City of Sacramento zoning ordinance 17.24.050. SMUD also will work with appropriate jurisdictions and landowners to attempt to ensure that the transmission line does not conflict with specific development plans. For these reasons, the Program will not conflict with Measure M or the Natomas Joint Vision Plan.

Comment: The City requests consultation prior to choosing a specific transmission line route if the annexation is approved. This consultation is necessary to avoid potential transmission line route conflicts with potential land uses and ensure that the zoning ordinance criterion is complied with for areas of potential future urbanization within the Natomas Joint Vision MOU area.

We appreciate your willingness to comply with our requests. If the annexation is approved, we look forward to the possibility of early consultation and collaboration on the siting of the potential transmission line route at the project level EIR phase. Thank you for the opportunity to comment on the DEIR for the subject project.

If you have any questions regarding our comments, please contact Ashley Feeney at 808-1941, or Steve Peterson at 808-5981.

Sincerely,



Ashley Feeney
Assistant Planner

Cc: Carol Shearly, Director of Planning
Steve Peterson, Principal Planner
Scot Mende, New Growth Manager

