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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 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 the City of West Sacramento's comments on the January 6, 2006 Draft Environmental Impact Report (DEIR) for the proposed SMUD annexation. The City of West Sacramento (City) has reviewed the DEIR, which we believe fairly describes the project's environmental impacts. We do have the following comments:

**Air Quality:** The City is interested in minimizing air quality impacts, and relies on the judgment and expertise of the Yolo Solano Air Quality Management District and the Sacramento Metropolitan Air Quality Management District to help us do so.

**Hazards and Hazardous Materials:** If the SMUD annexation is approved, SMUD should develop, through coordination with the appropriate West Sacramento departments, a transition plan for health and emergency services related to the electric facilities in West Sacramento and the balance of the annexed area.

**Land Use and Planning:** The DEIR proposes that SMUD will collaborate with property owners, local jurisdictions, and agencies for the siting of the proposed transmission line and substation and will utilize the Sacramento County General Plan for guidance. West Sacramento strongly supports and will participate in this public process, and recommends that SMUD consider the guidance provided by the Sacramento County General Plan for the siting of electrical facilities.

**Noise:** The DEIR concludes that the short-term noise associated with construction of the new transmission line and substation may exceed local noise ordinances. Although this work is primarily limited to existing rural and agricultural areas,

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West Sacramento requires that construction hours within the City be limited to: 7:00 a.m. to 7 p.m., Monday through Friday, and 8:00a.m. to 6 p.m. on Saturday and Sunday. In addition, all internal combustion engines must have suitable mufflers.

**Cumulative Impacts:** The expected growth in Sacramento, Placer, Yolo, Yuba, El Dorado, and Sutter counties by 2050 as forecasted by the Sacramento Area Council of Governments' (SACOG) Sacramento Region Blueprint will be significant. West Sacramento is pleased to see that SMUD has endorsed the Sacramento Region Blueprint. There will be significant challenges for jurisdictions working together to plan for these expected changes while minimizing the impact on the environment. West Sacramento agrees that the impacts identified in the DEIR related to SMUD's replacement of PG&E as electric service provider will be minimal in comparison to this regional growth, but in combination with other projects, could be cumulatively significant and unavoidable. West Sacramento expects, however, that SMUD's local governance and its reputation for leadership in energy efficiency and renewable energy will ensure that the region will be better equipped to manage this expected growth.

**Growth Inducement:** The DEIR concludes that the expected improvements in electric service reliability and reductions in electric rates within the annexation area may induce growth. For example, these improvements may contribute to decisions by commercial and industrial companies to locate to the annexation area. This is precisely why West Sacramento is interested in the annexation project. The service and rate improvements will permit the city to implement its ambitious redevelopment program and develop its numerous infill sites in close proximity to downtown Sacramento. West Sacramento believes that this expected growth will be well managed within its existing General and Specific Plans. West Sacramento has sufficient available commercial and industrial zoning to allow for such growth.

**Mitigation Measures and Mitigation Monitoring:** The DEIR proposes that SMUD be responsible for providing mitigation monitoring reports to LAFCo. West Sacramento agrees with this requirement to ensure accountability for mitigation.

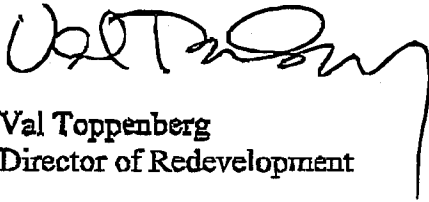
West Sacramento is currently working with SMUD to develop a mutually acceptable operating agreement or memorandum of understanding (MOU) to implement Program Component 3. Other agreements or MOUs may be necessary to implement terms and conditions that may be imposed by LAFCo.

As stated in the DEIR, if the annexation is approved by LAFCo and the voters, SMUD will perform future project level California Environmental Quality Act (CEQA) analysis for siting the proposed Willow Slough Substation and the Elverta to Woodland transmission line. West Sacramento would like to participate in any future analysis and may provide additional comments beyond those provided in this letter.

Thank you for the opportunity to comment on the DEIR.

If you have any questions, please contact Redevelopment Manager, Les Bowman at (916) 617-4535.

Sincerely

A handwritten signature in black ink, appearing to read "Val Toppenberg". The signature is fluid and cursive, with a long vertical line extending downwards from the end of the name.

Val Toppenberg  
Director of Redevelopment