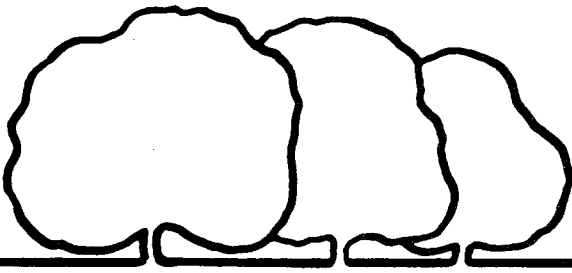


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FEB 9 - 2006



City of Woodland  
SACRAMENTO LOCAL AGENCY  
FORMATION COMMISSION

CITY COUNCIL

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February 7, 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 Woodland's comments on the January 6, 2006, Draft Environmental Impact Report (DEIR) for the proposed SMUD annexation.

However, on behalf of the Woodland City Council I take this opportunity to reinforce the critical importance of moving this initiative forward to our voters. One of the significant impacts that are commented on below is the "growth inducing" impact that the proposed annexation might have. That aspect is a capsule of why we seek this annexation: lower electrical costs and more reliable service will improve our economic base and make our businesses more competitive. It was reassuring to see the DEIR recite how the proposed annexation (Program) achieves all the Program Goals and Objectives; they serve to reinforce the wisdom of SMUD providing our electric service. Following are our comments on the DEIR:

**Corrections:** The description of the City of Woodland, on page III-2, would be more accurate if the population figure was revised from 49,151 to 53,382. Likewise, the City's area should be updated from 10 square miles to 14.5 square miles.

**Growth Inducement:** The DEIR concludes that the expected reductions in electric rates coupled with the anticipated improvements in electric service reliability within the annexation territory may induce growth. For example, these impacts from the proposed annexation may attract new commercial and industrial companies to locate to the annexation territory. The City's General Plan has 900 acres zoned for industrial and commercial uses and would welcome the economic benefits that its development would provide. The City views any growth inducement in our industrial area as a positive outcome for our City, its citizens and the region.

**Aesthetics:** The City understands that there may be impact of the aesthetics along County Road 16 which has been designated a scenic county roadway by Caltrans.

**Air Quality:** The City is interested in air quality impacts, but will defer to the judgment and expertise of the Yolo Solano Air Quality Management District and the Sacramento Metropolitan Air Quality Management District.

**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, the City ordinances require that construction times be limited to 7:00 a.m. to 6:00 p.m., Monday through Saturday and 9:00a.m. to 6:00 p.m. on Sunday. In addition, all internal combustion engines must have suitable mufflers.

**Land Use and Planning:** The DEIR proposes that SMUD will collaborate with property owners, local jurisdictions, and agencies for placement of the proposed transmission line and substation and will utilize the Sacramento County General Plan for guidance. The City strongly supports and will participate in this collaborative public process. SMUD appropriately proposes to consider the guidance provided by the Sacramento County General Plan for the placement of electrical facilities. On the western portions of the Sacramento River, the Yolo County General Plan should be used for guidance in the placement of such facilities in the unincorporated portions of Yolo County.

**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. The City 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. The City agrees that the impacts identified in the DEIR related to SMUD's replacing PG&E as its electric service provider will be minimal in comparison to this regional growth, but in combination with other projects, will be cumulatively significant and unavoidable. The City expects that having a partner like SMUD will assist the region in planning for and minimizing the expected impacts. SMUD's capacity for 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.

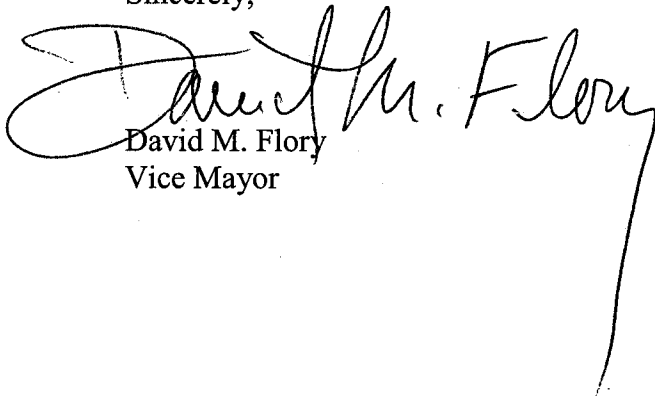
**Mitigation Measures and Mitigation Monitoring:** The DEIR proposes that SMUD be responsible for providing mitigation monitoring reports to the Sacramento LAFCo. The City agrees with this requirement to ensure accountability for mitigation.

As specified in Program Component 3, the City is working with SMUD to develop a mutually acceptable operating agreement or memorandum of understanding (MOU). Other agreements or MOUs may be necessary to implement terms and conditions that may ultimately 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 placement of the proposed Willow Slough Substation and the Elverta to Woodland transmission line. The DEIR only provides an outline of the study area for the possible location of these facilities. When the precise location of the transmission lines and substation facilities are established, the City of Woodland will review the follow-up project level environmental analysis. Therefore, additional comments - beyond those provided in this letter - on any future analysis will be provided at that time.

Thank you for the opportunity to comment on the DEIR. If you have any questions, please contact Assistant City Manager Phillip L. Marler (530 661-5805)

Sincerely,



David M. Flory  
Vice Mayor