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February 20, 2006

VIA FACSIMILE  
AND FIRST CLASS MAIL

Mr. Peter Brundage  
Sacramento County LAFCO  
1112 I Street, Suite 100  
Sacramento, CA 95814

**RE: Comments on Draft Environmental Impact Report (DEIR) –  
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:

Thank you for the opportunity to review and comment on the above referenced DEIR. I represent the Measure M Group, a group of developers who successfully passed an advisory measure regarding a mixed use community in south Sutter County. Measure M, passed by the voters of Sutter County in November 2004, authorizes the Sutter County Board of Supervisors to plan a mixed use community (residential/commercial/industrial) in the portion of south Sutter County, currently identified as the South Sutter County Industrial/Commercial Reserve. On January 11, 2006, the Measure M Group submitted to Sutter County a General Plan Amendment Application. This application envisions the development of a 7,500-acre community within the County's Industrial/Commercial Reserve. A copy of the proposed land use map submitted with the application is attached to this letter.

We have reviewed the DEIR and find the document does not adequately address the potential adverse impacts the Project has on the Measure M area of South Sutter County. In particular, our concerns arise in response to Program Component 6 (Woodland-Elverta Transmission Line Study Area).

For the past 12 months, our team of consultants has been preparing a Specific Plan for this area. It will be filed with the County this spring. As part of the Specific Plan application, we are also preparing a tentative map for a phase I of development (5,000 residential lots, approximately 300 acres of business park, 50 acres of regional commercial at the Riego Road/SR 99/70 interchange, and 30 acres of local dispersed commercial). We anticipate submitting the tentative map at the same time as the Specific Plan application. These applications will include the necessary zoning and land use entitlement exhibits and applications. An Environmental Impact Report for the Specific Plan will be prepared once the applications are

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filed later this spring. It is envisioned that all land use entitlements for the Specific Plan will be approved in early to mid 2007.

Our specific comments on the above referenced DEIR are as follows:

1. **Section II.F.2.b(1): Woodland-Elverta Transmission Line Study Area (Program Component 6):** The northerly limits of the Study Area within Sutter County (as depicted in Figure II-4 of the DEIR) bisect the Measure M General Plan Amendment (GPA) area. Assuming the final alignment of the transmission line will pass northerly of the northern limit of the protected airspace of Sacramento International Airport, it appears that the route of the transmission line will be no farther south than midway between Riego Road and Sankey Road westerly of Pole Line Road.

The foregoing proposed alignment will run through the residential component of our planned community. This alignment will have a significantly negative effect on our land planning effort. We have spent the last year working on developing a land plan that is attractive and feasible to build and at the same time that will be acceptable to Sutter County and the land owners and developers in the area. The Measure M concept plan was first presented to the public and Sutter County Board of Supervisors on August 30, 2005. This land use concept plan has been available from Sutter County and on its website since shortly thereafter. Our concept plan was again shared with Sutter County and the public at an open house event in Sutter County on October 3, 2005. At this time, the Measure M Group cannot support any alignment which runs through our planned community.

There are two alternatives to running the transmission line through our planned community: (1) at the point the transmission line clears the protected airspace of the Airport, it could extend southerly (past the south boundary of the GPA area) and then easterly around the GPA area; or (2) the transmission line could extend northerly (north of the GPA area) and then easterly around the GPA area. The Study Area, however, does not extend sufficiently to the north to include the northerly route around the northern limit of the GPA area.

Accordingly, the northerly extent of the Study Area in the DEIR should be extended to the northerly end of the Natomas Basin (the Natomas Cross Canal alignment) in order to provide the opportunity for development of the northerly alternative alignment. This will provide at least two alternative routes around the GPA area and in so doing avoiding the need to bisect our planned community.

2. **Section IV.H.1.c: Existing Regulatory Policies Applying to the Analysis Area.** The Measure M Specific Plan will include policy criteria for the placement of electrical transmission facilities of 100,000 volts or greater capacity. In general, those criteria will strongly discourage the siting of transmission lines within the Specific Plan area, and will include criteria similar to those currently used by the City of Sacramento and County of Sacramento for circumstances when routing of transmission lines through the Specific Plan area is unavoidable. The DEIR should address this issue.

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3. **Section V.A.10: South Sutter Specific Plan.** The information provided in this section of the DEIR, and perhaps others, incorrectly states the status of land use entitlement applications pending before Sutter County and the proposed phasing of development within the South Sutter Specific Plan area.

a. As mentioned above, a General Plan Amendment application was filed with Sutter County on January 11, 2006. This application depicts the proposed land uses for the Specific Plan area. This information should be utilized in the DEIR.

b. Also, as mentioned earlier, Specific Plan and Tentative Map applications will be submitted for processing by Sutter County later this spring. This information should be utilized in the DEIR.

c. References contained in the DEIR relating to phasing of development within the Specific Plan area are incorrect and appear to be 'left over' from the previous 3,500-acre specific plan for commercial and industrial development that was overturned by the courts in 2003. While the details of phasing within the Specific Plan are still being developed, it is believed that the first phase of development (approximately one-third of the plan area) will be centered around the proposed Riego Road/SR 99/70 interchange, but principally southerly of Riego Road. The proposed Riego Road/SR 99/70 interchange, for which a Caltrans approved Project Study Report (PSR) has been prepared, will replace the existing at-grade intersection of these two heavily traveled roads in the next few years.

The DEIR should be amended to adequately address the status of the current land use entitlement applications and the proposed phasing of development within the Specific Plan area.

Finally, I would like to be added to all lists for the mailing of notices and other information related to this project. If you have any questions about this comment letter, please do not hesitate to call me.

Respectfully yours,




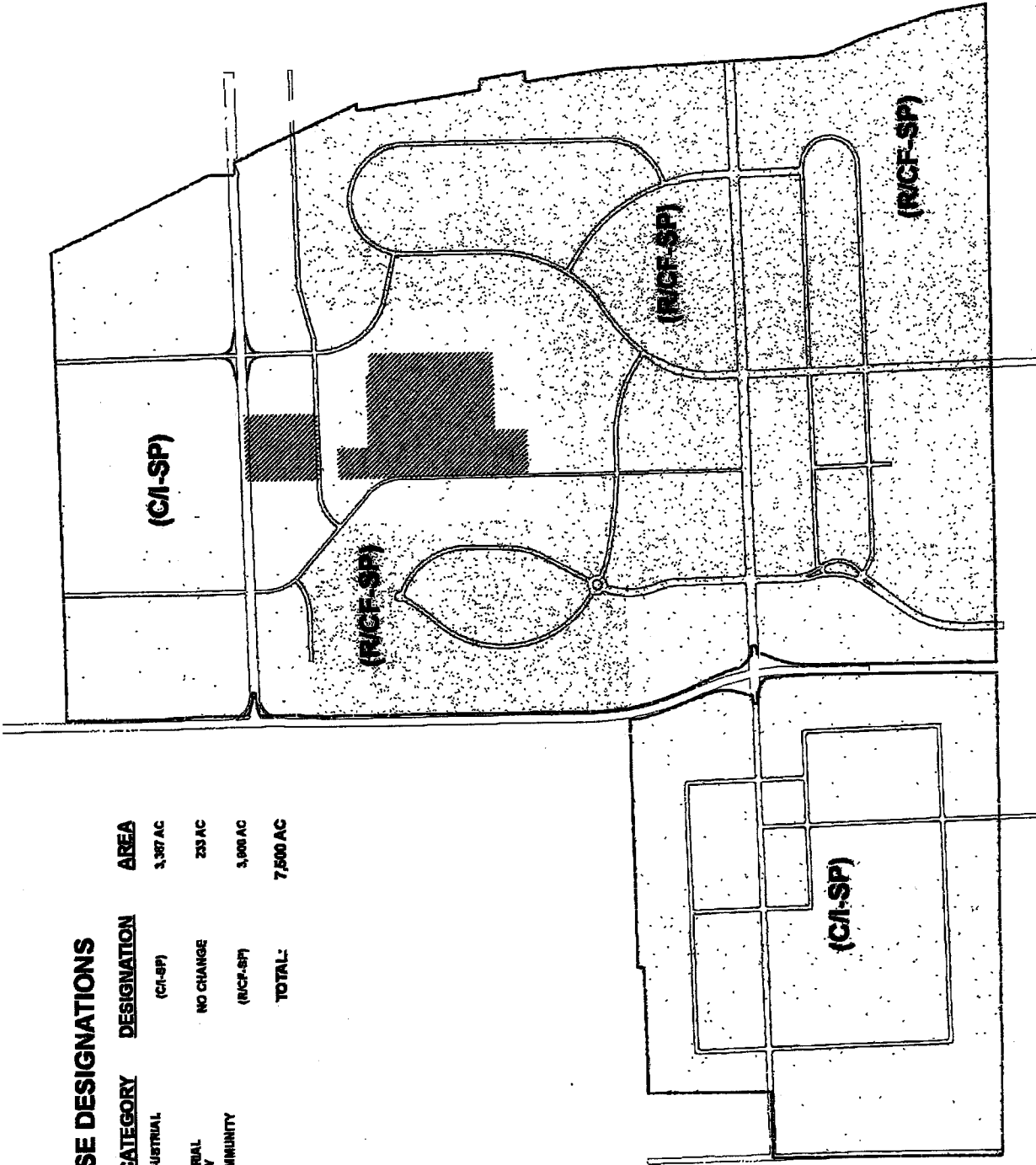
George M. Carpenter, Jr.

Encl.

cc: Doug Libby, Sutter County Community Services Department (via facsimile only)  
Measure M Group  
Ken Giberson, MacKay and Soms Engineers (via facsimile only)

**LAND USE DESIGNATIONS**

SYMBOL	LAND USE CATEGORY	DESIGNATION	AREA
	COMMERCIAL/INDUSTRIAL SPECIFIC PLAN	(CI-SP)	3,387 AC
	EXISTING INDUSTRIAL ZONED PROPERTY	NO CHANGE	233 AC
	RESIDENTIAL/COMMUNITY FACILITY SPECIFIC PLAN	(R/CF-SP)	3,900 AC
	<b>TOTAL:</b>		<b>7,500 AC</b>



THIS MAP IS A DRAFT AND SUBJECT TO CHANGE

**GENERAL PLAN AMENDMENT LAND USE - EXHIBIT 4**

REVISION FEBRUARY 13, 2005

FORMA

**SOUTH SUTTER COUNTY SPECIFIC PLAN  
MEASURE "M" GROUP**