



DEVELOPMENT SERVICES
DEPARTMENT

CITY OF SACRAMENTO
CALIFORNIA

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October 3, 2005

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

Subject: Comments on the Notice of Preparation of a 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 Notice of Preparation (NOP) of a Program Environmental Impact Report (EIR) for the subject SMUD annexation. We have reviewed the most recent notice dated September 1, 2005 and have the following comments:

Agriculture Resources: The Technical Background Report (TBR) for the City of Sacramento's General Plan Update identified 5,950 acres of Williamson Act lands within the adopted Policy Area. The purpose of the TBR is to provide a profile and analysis of existing conditions pertaining to the Policy Area. The Policy Area includes the City boundaries, the City's Sphere of Influence (SOI), and additional area in which adopted City policies may relate. The majority, if not all of the Williamson Act lands are located outside of the City limits. Farmland protection is of great importance to the City of Sacramento within the unincorporated portion of Sacramento County that falls within the 115kV Transmission Line Study Area as shown in Attachment H, Figure 1 of the NOP.

On December 10, 2002 the Sacramento City Council and the Sacramento County Board of Supervisors approved the Memorandum of Understanding regarding principles of land use and revenue sharing for the Natomas area. As you are aware, this has come to be known as the "Natomas Joint Vision" (NJV). One of the key principles identified in the MOU is the protection of Farmland. The City and County agreed on four principles related to Open Space:

- 1) Open Space Preservation
- 2) Farmland Protection
- 3) Habitat Protection
- 4) Airport Protection



Please discuss the impacts to Williamson Act lands or the conversion of farmland that falls within the transmission line study area. Please provide mitigation measures for farmland that is lost to transmission line conversion or no longer agriculturally viable due to the transmission line path.

Biological Resources: The Biological Resources section of the City of Sacramento's TBR for the General Plan Update identifies many special-status species that could potentially be impacted by a transmission line route. Please see Attachment 1, Table 6.1-1, Special Status Species Potentially Occurring in the City of Sacramento's 2005 General Plan Update Policy Area and the associated map Figure 6.1-2, Biological Resources Sensitive Elements, from the Biological Resources section of the TBR.

The Natomas Basin Habitat Conservation Plan (HCP) and Metro Airpark HCP further identifies special-status species that are present and could potentially be impacted by a transmission line route in the Proposed Elverta Substation to Woodland Substation 115kV Transmission Line Study Area. The EIR should consider impacts to biological resources in the context of the Natomas Basin and Metro Airpark HCPs. Habitat Protection is a key principle of the City-County MOU NJV area. The City and County are developing an Open Space Program for the NJV area that will provide for habitat connectivity. The EIR should further consider the impacts of a transmission line route to habitat connectivity and existing habitat corridors.

Cultural Resources: The Cultural Resources section of the City of Sacramento's TBR identifies areas of low, moderate and high sensitivity in regards to Cultural resources. Please see Attachment 2, Figure 6.3-1, Archaeological Sensitivity Map. There does appear to be areas of high sensitivity within the transmission line study area. The appropriate Tribes should be notified and consulted per SB 18 Tribal Consultation Guidelines, regarding the Cultural Resources in the transmission line study area. The EIR should adequately address potential impacts to Cultural Resources resulting from the placement of a transmission line route.

Land Use and Planning: The City of Sacramento is in the process of amending the City's SOI. The SOI amendment is necessary in order to plan for the orderly expansion of the City to accommodate 200,000 additional people over the next 25 years, as projected in our General Plan update. The area proposed for the SOI amendment would implement the City-County NJV MOU objectives and is consistent with the SACOG approved Regional Blueprint growth scenario (please see the attached map).

The location of transmission lines and substations could potentially impact densities required to meet population and employment objectives. The EIR should consider potential impacts to the urbanization of the proposed SOI amendment area.

The City of Sacramento's preferential locations for transmission line routes are in the order specified below:

- 1) Within existing SMUD transmission rights-of-way or rights-of-way anticipated for other proposed projects.
- 2) Adjacent to railroads or adopted freeway routes.
- 3) Along or adjacent to arterial streets where existing or planned uses are commercial or industrial.
- 4) Adjacent to or through existing or planned commercial, industrial, or agricultural uses.
- 5) Along arterial streets where uses in the plan are predominantly commercial, but include residential uses.



- 6) Through residential areas, including side and rear yards, irrespective of density.

The City of Sacramento's preferential locations for substations are in the order specified below:

- 1) Areas designated for industrial or commercial land uses in an adopted plan.
- 2) Undeveloped areas designated for residential use in an adopted plan.
- 3) Areas designated Agriculture (A) in an adopted plan.
- 4) Sites designated for residential use in an adopted plan and surrounded by existing residential uses.

Please see Chapter 17.24.050 Footnote 61, of the City of Sacramento's Zoning Ordinance regarding High Voltage Transmission Facilities.


Noise: A copy of the City's Noise Ordinance and criteria will be provided as requested.

Population and Housing: Please see comments under Land Use and Planning regarding Population and Housing. The EIR should consider potential impacts to the densities proposed in the City of Sacramento's SOI amendment.

If desired, City staff would be happy to discuss our comments with you further. Please consider the incorporation of our comments into the EIR discussion. Please keep us on your distribution list for any future items regarding this project. Thank you for the opportunity to comment on the NOP for the subject project. If the proposed annexation is successful, we request to participate in the project level EIR where specific routes will be proposed.

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

Sincerely,



Ashley Feeney
Assistant Planner

Cc: Carol Shearly, Interim Planning Director
Steve Peterson, Principal Planner



Special-Status Species

The following special-status species are known to occur within the natural habitats most likely to be present within the Policy Area boundaries. These and other species potentially occurring in the Policy Area can be found in Table 6.1-1. Figure 6.1-2 shows the locations of sensitive elements within the Policy Area.

Table 6.1-1. Special-Status Species Potentially Occurring in the City of Sacramento's 2005 General Plan Update Policy Area

Scientific Name	Common Name	Status Fed/State/ Other	Habitat
Plants			
<i>Astragalus tener</i> var. <i>tener</i>	Alkali milk-vetch	--/--/1B	Vernal pools, playas and Valley grasslands on adobe clay and/or alkaline soils.
<i>Atriplex depressa</i>	Brittlescale	--/--/1B	Chenopod scrub, meadows, playas, valley grassland, vernal pools. Usually in alkali scalds or alkali clay in meadows or annual grassland.
<i>Atriplex joaquiniana</i>	San Joaquin saltbush	--/--/1B	Chenopod scrub, alkali meadow, valley and foothill grassland.
<i>Balsamorhiza macrolepis</i> var. <i>macrolepis</i>	Big-scale balsamroot	--/--/1B	Grassland
<i>Cordylanthus mollis</i> var. <i>hispidus</i>	Hispid bird's beak	FSC/--/1B	Grassland/ vernal pool.
<i>Cordylanthus palmatus</i>	Palmate-bracted bird's-beak	E/E/1B	Chenopod scrub, valley and foothill grassland. usually on alkaline clay, with <i>Distichlis</i> , <i>Frankenia</i> , etc.
<i>Downingia pusilla</i>	Dwarf downingia	--/--/2	Vernal pool
<i>Hibiscus lasiocarpus</i>	Rose mallow	--/--/1B	Freshwater marshes and swamps in the Central Valley.
<i>Gratiola heterosepala</i>	Boggs Lake hedge-hyssop	--/E/1B	Vernal pool
<i>Juglans hindsii</i>	Northern California black walnut	--/--/1B	Riparian forest, and woodland. Few extant native stands remain; but is widely naturalized from rootstock plants.
<i>Juncus leiospermus</i> var. <i>ahartii</i>	Ahart's dwarf rush	FSC/--/1B	Vernal pool
<i>Legenere limosa</i>	Legenere	FSC/--/1B	Vernal pool
<i>Lepidium latipes</i> var. <i>heckardii</i>	Heckard's peppergrass	--/--/1B	Valley and foothill grassland and vernal pools on alkaline soils.
<i>Navarretia myersii</i>	Pincushion navarretia	--/--/1B	Vernal pool
<i>Orcuttia tenuis</i>	Slender orcutt grass	T/E/1B	Vernal pool
<i>Sagittaria sanfordii</i>	Sanford's arrowhead	FSC/--/1B	Marshes and swamps (assorted shallow fresh water).
Invertebrates			
<i>Branchinecta lynchi</i>	Vernal pool fairy shrimp	T/--	Vernal pools and seasonal wetlands in grassland habitats.
<i>Desmocerus californicus dimorphus</i>	Valley elderberry longhorn beetle	T/--	Elderberry shrubs, typically in or near riparian areas.
<i>Lepidurus packardii</i>	Vernal pool tadpole shrimp	E/--	Vernal pools and seasonal wetlands in grassland habitats.
<i>Linderiella occidentalis</i>	California linderiella	FSC/--	Vernal pools and seasonal wetlands in grassland habitats.
Fish			
<i>Archoplites interruptus</i>	Sacramento Perch	--/CSC	Historically found in the sloughs, slow-moving rivers, and lakes of the central valley. Prefer warm water. Aquatic vegetation is essential for young. Tolerant of a wide range of physio-chemical water conditions.
<i>Oncorhynchus tshawytscha</i>	Central Valley spring run Chinook salmon	T/T	Occurs in the Pacific Ocean for most of its life. Travels to clean gravel beds in the upper

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Scientific Name	Common Name	Status Fed/State/Other	Habitat
			Sacramento and portions of the American River for spawning.
<i>Oncorhynchus tshawytscha</i>	Central Valley Winter run Chinook salmon	E/E	Occurs in the Pacific Ocean for most of its life. Travels to clean gravel beds in the upper Sacramento and portions of the American River for spawning.
<i>Oncorhynchus mykiss</i>	Central Valley steelhead	T/--	Occurs in the Pacific Ocean for most of its life. Travels to clean gravel beds in the upper Sacramento and portions of the American River for spawning.
<i>Hypomesus transpacificus</i>	Delta smelt	T/T	Occurs in Sacramento-San Joaquin Delta most of the year. Spawns in tidally influenced freshwater wetlands and seasonally submerged uplands along the Sacramento River, downstream from its confluence with the American River.
<i>Pogonichthys macrolepidotus</i>	Sacramento splittail	SC/CSC	Endemic to the lakes and rivers of the central valley, but now confined to the Delta, Suisun Bay & associated marshes. Prefers slow moving river sections, dead end sloughs. Requires flooded vegetation for spawning & foraging for young.
Amphibians			
<i>Spea hammondi</i>	Western spadefoot	--/CSC	Breeds in seasonal wetlands and large vernal pools, spends most of the year underground in adjacent upland areas.
Reptiles			
<i>Actinemys marmorata</i>	Western pond turtle	FSC/CSC	Ponds, streams, rivers, marshes and canals with suitable basking sites and vegetative cover. Nests and aestivates in adjacent uplands.
<i>Phrynosoma coronatum frontale</i>	California horned lizard	FSC/CSC/none	Annual grassland, chaparral, saltbush scrub, alkali flats, oak woodland, riparian woodland, and coniferous forest; open habitats with loose fine (often sandy) soils.
<i>Thamnophis gigas</i>	Giant garter snake	T/T/--	Cattail and tule marshes, low gradient streams, rice fields and canals on the Valley floor.
Birds			
<i>Accipiter cooperii</i>	Cooper's hawk	--/CSC (Nesting)	Nests and forages in woodland habitats.
<i>Agelaius tricolor</i>	Tricolor blackbird	FSC/CSC	Nest in dense stands of cattails, thickets of willows, blackberries, or tall herbs adjacent to open grasslands.
<i>Accipiter striatus</i>	Sharp-shinned hawk	--/CSC (Nesting)	Nests in forests; forages in wooded habitats
<i>Aquila chrysaetos</i>	Golden eagle	FP/CSC	Nests on cliffs and very large trees. Forages primarily in grasslands and chaparral, but also woodlands and other relatively open habitats.
<i>Asio otus</i>	Long-eared owl	--/CSC (Nesting)	Nests and forages in oak and riparian woodlands.
<i>Athene cunicularia</i>	Burrowing owl	SC/CSC	Grassland, deserts and other open habitats. Requires ground squirrel or other small mammal burrows for nesting.
<i>Buteo regalis</i>	Ferruginous hawk	FSC/CSC	Forages in open grasslands and chaparral. Not known to nest in California
<i>Buteo swainsoni</i>	Swainson's hawk	--/T	Nests in riparian trees; forages in open fields

Table 6.1-1. Special-Status Species Potentially Occurring in the City of Sacramento’s 2005 General Plan Update Policy Area

Scientific Name	Common Name	Status Fed/State/ Other	Habitat
<i>Circus cyaneus</i>	Northern harrier	--/CSC	Nests in freshwater marsh and agricultural fields; forages in marshes, grasslands and agricultural fields.
<i>Elanus leucurus</i>	White-tailed kite	FSC/FP (Nesting)	Nests colonially in large trees adjacent to open grasslands for foraging.
<i>Eremophila alpestris</i>	Horned lark	SC/CSC	Forages and nests in open grasslands.
<i>Lanius ludovicianus</i>	Loggerhead shrike	--/CSC	Nests in woodlands adjacent to grassland foraging habitat.
<i>Progne subis</i>	Purple martin	--/CSC	Nest in cavities in trees, under bridges and other human-made structures.
<i>Riparia riparia</i>	Bank swallow	--/T	Nests in sandy banks or cliffs, usually over water (typically rivers and streams).
Mammals			
<i>Antrozous pallida</i>	Pallid bat	FSC/CSC/ none	Roosts in crevices in caves, mines, large rock outcrops, under bridges and in abandoned buildings. Forages on or near the ground in a wide variety of open habitats.
<i>Corynorhinus townsendii townsendii</i>	Pacific western big eared bat	FSC/CSC/n one	Roosts in the open in large caves, abandoned mines and buildings. Very sensitive to roost disturbance.
<i>Myotis ciliolabrum</i>	Small-footed myotis bat	FSC/CSC/n one	Occurs in most of California except the coastal redwood region; roosts in buildings, trees, and crevices in cliffs.
<i>Myotis volans</i>	Long-legged myotis bat	FSC/CSC/ none	Roosts in crevices in caves, mines, large rock outcrops, under bridges and in abandoned buildings. Forages in a wide variety of open habitats, frequently over water.
<i>Myotis yumanensis</i>	Yuma myotis bat	FSC/CSC/n one	Common along wooded canyon bottoms throughout California; roosts in buildings, large trees with hollows, and crevices in cliffs.
<i>Perognathus inornatus</i>	San Joaquin pocket mouse	FSC/CSC/n one	Open grasslands, preferably (but not restricted to) areas with friable soils.

Notes:

Scientific names are based on the following source: California Department of Fish and Game, Special Animals, July 2000.

Status = Status of species relative to the Federal and California State Endangered Species Acts and Fish and Game Code of California.

Fed = Federal status.

E = Federally listed as endangered.

T = Federally listed as threatened.

PE = Proposed endangered.

PT = Proposed threatened.

C = Federal candidate for listing as threatened or endangered.

FSC = Federal species of concern.

CA = California status.

E = Endangered; Species whose continued existence in California is jeopardized.

T = Threatened; Species that although not presently threatened in California with extinction, is likely to become endangered in the foreseeable future.

CSC = California Department of Fish and Game "Species of Special Concern". Species with declining populations in California.

FP = Fully protected against take pursuant to the Fish and Game Code Section 3503.5.

-- = No California or federal status.

CNPS – California Native Plant Society

1A – Plant species that is presumed extinct in California.

1B - Plant species that is rare or endangered in California or elsewhere.

2 - Plant species that is rare or endangered in California, but is more common elsewhere.

3 - Plant species for which more information is needed to determine status.

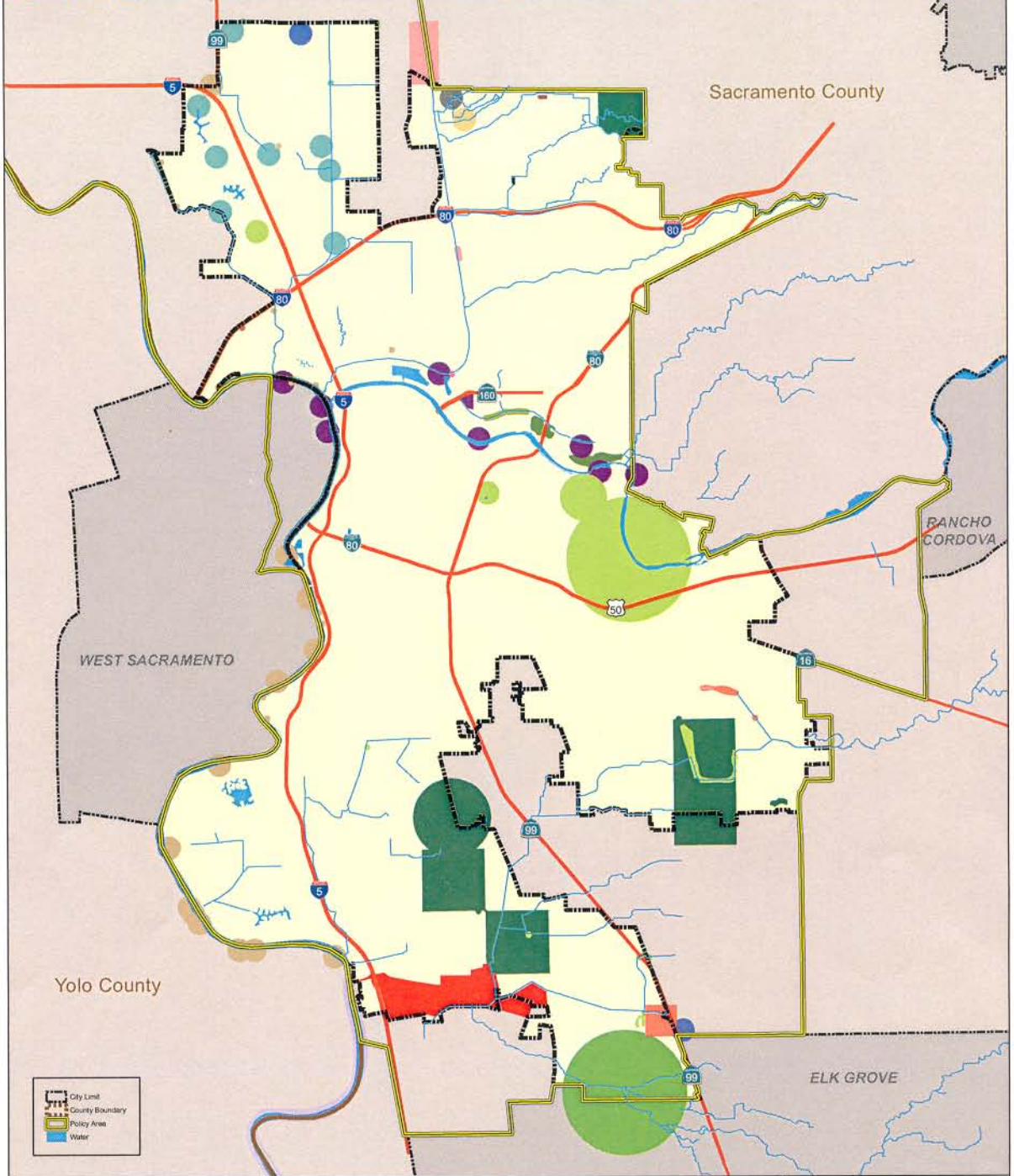
4 - Plant species that have a limited distribution.

Source: California Department of Fish and Game, California Natural Diversity Database, 2005.



CITY OF SACRAMENTO GENERAL PLAN

Building a Great City



Legend

Sensitive Elements

- | | |
|----------------------------------|--|
| BANK SWALLOW | PURPLE MARTIN |
| BURROWING OWL | ROSE-MALLOW |
| CALIFORNIA LINDERIELLA | SACRAMENTO PERCH |
| COOPER'S HAWK | SACRAMENTO SPLITTAIL |
| ELDERBERRY SAVANNA | SANFORD'S ARROWHEAD |
| GIANT GARTER SNAKE | SWAINSON'S HAWK |
| GREAT BLUE HERON | TRICOLORED BLACKBIRD |
| GREAT EGRET | VALLEY ELDERBERRY LONGHORN BEETLE |
| LEGENERE | VERNAL POOL FAIRY SHRIMP |
| NORTHERN CALIFORNIA BLACK WALNUT | VERNAL POOL TADPOLE SHRIMP |
| NORTHERN CLAYPAN VERNAL POOL | WESTERN POND TURTLE |
| NORTHERN HARDPAN VERNAL POOL | WHITE-TAILED KITE |
| | Not yet surveyed, potential biological resource study area |
| | North Sacramento Park Protected Wetland Area |

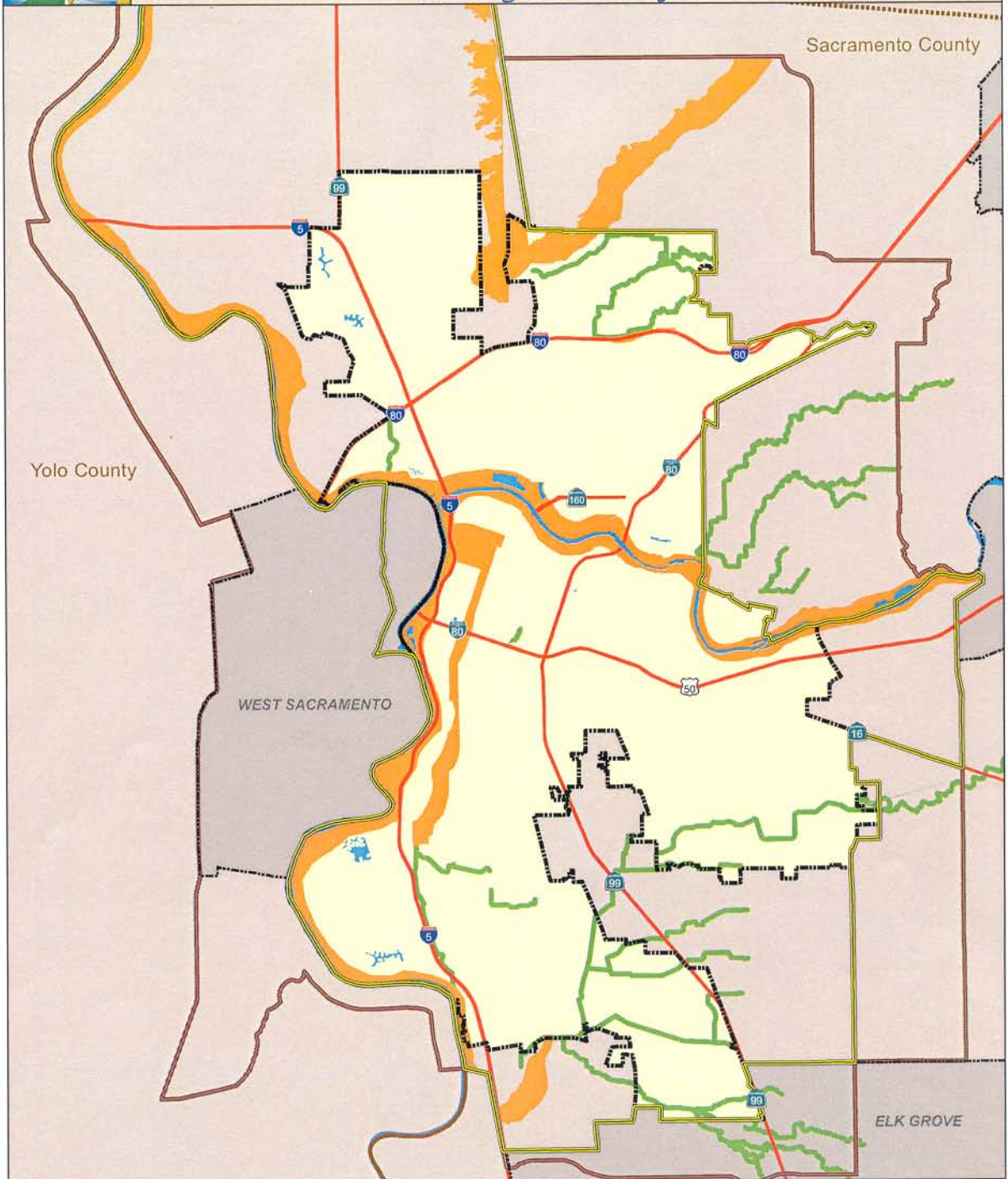
Figure 6.1-2
Biological Resources
Sensitive Elements

U.S. Fish and
Wildlife Service
Wetlands
data current
as of 2003



CITY OF SACRAMENTO GENERAL PLAN

Building a Great City



Legend

- City Limit
 - County Boundary
 - Policy Area
 - Study Area
 - Water
 - Highway
-
- Archaeological Sensitivity Level**
 - High
 - Moderate

Figure 6.3-1

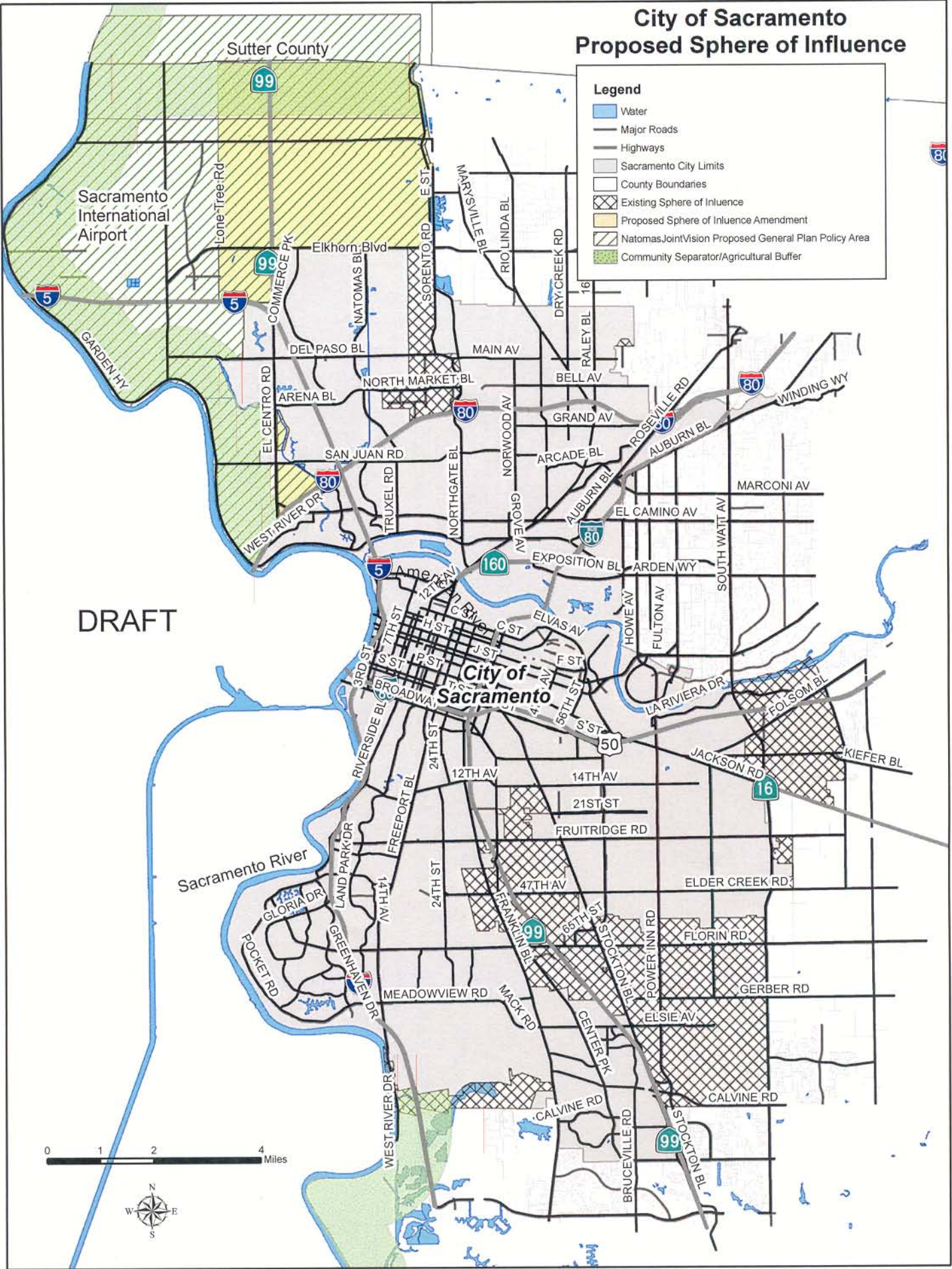
Archaeological Sensitivity

Data source: 0 1 2
Peek & Associates
2005 Miles

City of Sacramento Proposed Sphere of Influence

Legend

- Water
- Major Roads
- Highways
- Sacramento City Limits
- County Boundaries
- Existing Sphere of Influence
- Proposed Sphere of Influence Amendment
- Natomas Joint Vision Proposed General Plan Policy Area
- Community Separator/Agricultural Buffer



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