LAFCO

Yolo County Local Agency Formation Commission
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September 19, 2005

Peter Brundage, Executive Officer
Sacramento LAFCO
1112 I Street, Suite 100
Sacramento, CA 95814-2836

Subject: Notice of Preparation (NOP) of a Program Environmental Impact Report for the Amendment to the Sphere of Influence for the Sacramento Municipal Utility District (SMUD) and Annexation by SMUD of the Cities of Davis, West Sacramento and Woodland and Portions of Unincorporated Areas of Yolo County

Dear Mr. Brundage,

Thank you for contacting the Yolo County Local Agency Formation Commission regarding the Project above. As you know, Yolo LAFCO has three areas of concern:

1. Protect agricultural lands
2. Prevent urban sprawl
3. Provision of efficient services

Per your request, this is Yolo County LAFCO's response to the Notice of Preparation (NOP). LAFCO staff reviewed the NOP's content for information based on LAFCO's legislative mandate. Consequently, LAFCO staff has the following comments. We respectfully submit these to you as Yolo County LAFCO's response to the NOP:

- Section II – Agriculture Resources: Should the annexation be approved, there is a likelihood that SMUD may need to install additional transmission and substation facilities in agricultural lands. The NOP notes that these "facilities will have relatively small footprints." While the individual footprints may be small, the PEIR should discuss whether the cumulative impact of these footprints would result in a substantial loss of prime soils and any growth-inducing impacts that may result. This impact will depend on whether SMUD plans to use existing easements or rights-of-way secured by Pacific Gas and Electric (PG&E). If SMUD contemplates acquiring additional easements, it should consider mitigating for the loss of farmland according to either the Yolo County LAFCO Agricultural Conservation Policy or the appropriate jurisdictional policy.

- Attachment A: The map shows an area highlighted as "West Sacramento Proposed S. (Sphere) of Influence". The current West Sacramento Sphere of Influence (SOI) is coterminous with the City Limit, as established by LAFCO during the City's incorporation process in 1988. Yolo County LAFCO is currently not reviewing, or started to review, the West Sacramento SOI. In addition, West Sacramento has not requested an update to its SOI. Given this, the map should be updated to show the currently highlighted "West Sacramento SOI" area as simply unincorporated Yolo County.
- Attachment A: The map excludes two parcels to the southwest of Davis, south of Putah Creek, between Interstate 80, University of California at Davis (UCD) and the City of Davis. From discussions between LAFCO staff and SMUD staff, a line that serves Solano County and UCD also services these two parcels. However, these two parcels are within unincorporated Yolo County that should be included in the proposed SMUD annexation area. SMUD staff indicates that it is feasible for a small transmission line to be routed into those two parcels from the City of Davis. The PG&E transmission lines to UCD and to Solano County would remain unaffected; consequently, UCD and Solano County would continue to receive electrical service from PG&E. Although this may mean a duplication of lines, its scale should be small enough and the cost should be reasonably low enough to warrant the inclusion of these two parcels.

Please keep us appraised of this Project as it proceeds through your process. We will appreciate receiving the Program EIR and the opportunity to review further reports as they become available. Please call José Henríquez, LAFCO Analyst, or myself if you have any questions about our response.

Sincerely,

Elizabeth Castro Kemper
Executive Officer

cc: Yolo County LAFCO Commissioners