

September 2, 2008

Ms. Sandra Kiriu, AICP  
City of Galt Planning Department  
495 Industrial Drive  
Galt, CA 95632

**City of Galt General Plan 2030 Draft Environmental Impact Report**  
**SMAQMD Tracking Number: SAC200400168i**

Dear Ms. Kiriu:

Thank you for providing the Draft Environmental Impact Report (DEIR) for the City of Galt General Plan 2030 to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD's comments are organized into the following two sections, DEIR and Policy Document.

**DEIR Comments**

1. (Pages 10-43, -44) Please clarify if the greenhouse gas emissions inventory presented includes only the City of Galt operations or if the inventory includes land use development and vendors such as garbage collection, transit and other industries operating in Galt.
2. (Page 10-47) The operational emissions presented in Table 10-7 are confusing. The SMAQMD recognizes that onroad vehicle emissions will decrease over time due to technology advances, but subtracting the negative incremental increase in onroad vehicle emissions from the 2030 area source emissions doesn't clearly present emissions from the project in 2030. It would be less confusing if onroad vehicle emissions for 2030 were added to area source emissions for 2030. Additionally, area source emissions from 2005 should be provided and added to 2005 onroad vehicle emissions so the total emissions change from 2005 to 2030 could be presented.
3. (Pages 10-48, -49, -50, -51, -54, -55) The SMAQMD appreciates the addition of new policies COS-5.11 and 5.12 regarding construction mitigation measures and fees, which add clarification to existing policy COS-5.9, Air Quality Mitigation Measures.
4. (Pages 10-49, -53) The DEIR states that impacts 10.7-1<sup>1</sup> and 10.7-3<sup>2</sup> are considered significant and unavoidable and that no additional feasible mitigation measures are currently available. The SMAQMD provided a model air quality element to the City of Galt which offered numerous air quality beneficial policies. The SMAQMD commends the City of Galt for including many of these policies in its General Plan, but the City of Galt should consider the addition of a few more of these polices before stating that no additional feasible mitigation measures are available.

<sup>1</sup> Impact 10.7-1: The proposed project would result in a cumulatively considerable net increase of criteria pollutants.

<sup>2</sup> Impact 10.7-3: Buildout of the proposed project would generate emissions above the daily SMAQMD significance thresholds for NOx and ROG...

Many of these policies pertain to transportation demand management. The following policies should be considered for inclusion:

- a. adding the transit subsidy (or more generically an alternative transportation mode subsidy) component back into policy COS-6.3 since at some point in the future transit may be expanded in Galt, but in the near term could be used to encourage employees to walk and bicycle to work (AQ-21);
  - b. encouraging commercial, retail and residential developments to participate in or create a Transportation Management Association (AQ-23);
  - c. encouraging business owners to schedule deliveries at off-peak traffic periods (AQ-24);
  - d. providing disincentives for single-occupant vehicle trips through parking supply and pricing controls in areas where supply is limited and alternative transportation modes are available (AQ-25);
  - e. supporting the development of a County Service Area (or similar mechanism) in order to create funding for transportation services that provide air quality benefits (AQ-26);
  - f. encouraging businesses to provide employees with information on alternatives to single-occupancy driving (AQ-42); and
  - g. adopting a policy or ordinance that provides preference to contractors using reduced emissions equipment for City construction projects as well as for City contracts for services (AQ-29).
5. (Page 10-53, -54, -55) The City of Galt should consider noting that policy LU-1.14, Land Use Decision Equity, and the policies under Goal LU-10, Environmental Justice, assist with mitigation of impact 10.7-4<sup>3</sup>.
  6. (Page 10-56) The description in the second sentence of the impact analysis section of impact 10.7-6 should be expanded to include area sources, not just stationary sources.
  7. (Page 10-57) It would be helpful to have a comprehensive listing of policies beyond the Conservation Element that more fully describe Galt's efforts in this General Plan to reduce greenhouse gas emissions. There are policies in the Land Use and Circulation elements that could be referenced. Additionally, a comparison of the City of Galt's policies should be made to the mitigation measures/policies provided by the California Attorney General's Office found at <http://ag.ca.gov/globalwarming/ceqa.php>.
  8. (Page 10-58) The SMAQMD commends the City of Galt for strengthening Policy COS-7.1, Greenhouse Gas Emission Reduction, to more fully address climate change and greenhouse gas emissions. SMAQMD does have a few recommendations that would clarify and further strengthen the policy:
    - a. Change the policy from "should" to "shall" reduce.
    - b. First bullet: clarify that the inventory will be comprehensive and include land use development, vendors, industry, etc. not only City operations.
    - c. Second bullet: emission levels for the year 2020 should be included since 2020 is a milestone year in the context of the California Global Warming Solutions Act of 2006 (aka AB32).
    - d. Add a fourth bullet that would include identifying specific actions in the Plan to meet the target once set.

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<sup>3</sup> Impact 10.7-4: The proposed project would expose sensitive receptors to substantial pollutant concentrations.

- e. Consider adding information in the Plan that would address how the City of Galt will adapt to the impacts resulting from a change in climate (i.e., fire risk, water resources, energy demand, and agriculture).

### Policy Document Comments

1. The mixed use land use designation (noted in policies LU-4.9, LU-6.2 and COS-5.4) can be a powerful tool to encourage development that leads to fewer and shorter vehicle trips. Currently the mixed use land use designation accounts for less than 1% of the planning area compared to 51% of the planning area designated for low density residential land uses. The SMAQMD encourages the City of Galt to assign additional acreage to the mixed used land use designation category, or at least identify additional opportunities for mixed use development with an overlay of other land use designations where mixed use development would be allowed.
2. An implementation program is needed to ensure policy C-5.7, Transit Plan, is undertaken.
3. SMAQMD requests the City of Galt change policy COS-5.6, SMAQMD Coordination, from "should" to "shall."
4. SMAQMD requests the City of Galt change policy COS-5.10, New Development Operational Emissions Reductions, from "should" to "shall."
5. Changes to policy COS-7.1, Greenhouse Gas Emission Reduction, noted in the DEIR, necessitate the inclusion of a new implementation program to support the expanded policy.
6. SMAQMD encourages the City of Galt to expand policy COS-7.12, Residential Rehabilitations and Improvements, to exceed the minimum energy efficiency standards.

The SMAQMD appreciates the efforts made by the City of Galt to incorporate air quality and climate change policies in its General Plan and welcomes the opportunity to continue working with City staff to implement a General Plan that maximizes overall improvements in air quality within the City of Galt and throughout the region.

If you have any questions regarding this letter, please contact Larry Robinson of my staff at (916) 874-4816 or [lrobinson@airquality.org](mailto:lrobinson@airquality.org).

Sincerely,



Larry Greene  
Executive Director/Air Pollution Control Officer

cc: Larry Robinson, SMAQMD  
Karen Huss, SMAQMD