July 15, 2014

Ms. Cindy Gnos
City of Galt Community Development Department
495 Industrial Drive
Galt, CA 95632

Eastview Specific Plan & Annexation Notice of Preparation (SAC201201440)

Dear Ms. Gnos:

Thank you for providing the Notice of Preparation for the Eastview Specific Plan & Annexation project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. The Eastview Specific Plan project proposes annexation of approximately 500 acres into the City of Galt. The project is located east of Marengo Road and south of Twin Cities Road, with 323 acres currently being proposed for development, including 1,735 residential units. SMAQMD provided comments on the project in a February 24, 2014 letter to the Galt Community Development Department that are still valid. The letter is attached. Additional comments follow.

1. Discuss the project’s consistency with Galt’s General Plan, Bike Transportation Plan, SACOG’s Metropolitan Transportation Plan/Sustainable Communities Strategy, the Global Warming Solutions Act of 2006 (AB32) and the California Air Resources Board’s Scoping Plan.

2. The proposed land use allocation reduces the diversity of housing types and density by adding 766 low density residential units and eliminating 201 high density, 366 medium-high density and 306 medium density residential units. Reducing housing density also reduces the possibility of supporting future transit service in the area.

3. Discuss the project’s compatibility with surrounding land uses (current and expected). Especially note sensitive receptors’ proximity to the rail road tracks.

Please contact me at 916-874-4881 or khuss@airquality.org if you have any questions regarding the SMAQMD’s comments. I look forward to reviewing the draft Environmental Impact Report and Specific Plan.

Sincerely,

Karen Huss
Associate Air Quality Planner/Analyst

Attachment

Cc: Larry Robinson, SMAQMD
February 24, 2014

SENT VIA E-MAIL ONLY

Mr. Chris Erias, Senior Planner  
City of Galt Community Development Department  
495 Industrial Drive  
Galt, CA 95632

Eastview Specific Plan (SAC201201440)

Dear Mr. Erias:

Thank you for providing the Eastview Specific Plan project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. The Eastview Specific Plan project proposes annexation of 500 acres into the City of Galt, with approximately 337 acres proposed for development of 1,400 residential units, including a general plan amendment, prezone, tentative subdivision map and development agreement. SMAQMD staff recommendations follow.


2. Analyze and disclose the amount of construction and operational related emissions from the project including: nitrogen oxides (NOx), reactive organic gases (ROG), exhaust and fugitive dust particulate matter (PM$_{10}$ and PM$_{2.5}$), greenhouse gas emissions (GHG), toxic air contaminants (TAC) and odors. CalEEMod is the most widely accepted air emissions estimation model for land development projects. The model and its user guide can be downloaded free of charge from [http://www.caleemod.com/](http://www.caleemod.com/).

3. Determine if project emissions will cause significant impacts to air quality by comparing the emissions levels to significance thresholds.

4. Describe all feasible mitigation measures that will be implemented for the project to avoid and/or minimize significant impacts for each pollutant. The SMAQMD provides standard mitigation for construction emissions in its CEQA Guide and options for mitigation of operational emissions in the *Recommended Guidance for Land Use Emission Reductions* [http://www.airquality.org/ceqa/RecommendedGuidanceLandUseEmissionReductions.pdf](http://www.airquality.org/ceqa/RecommendedGuidanceLandUseEmissionReductions.pdf). The size of the project is expected to exceed SMAQMD construction and operational thresholds, therefore requiring the development of an air quality mitigation plan and inclusion of construction mitigation measures (GP Policy COS-5.10, COS-5.11, and COS-5.12).

5. Include all analyses assumptions, calculations and modeling runs in the environmental document (or its appendices).
6. Follow the overarching guidelines of General Plan Policy LU-1.1 (b) by demonstrating the incorporation of the following items in the specific plan area:
   a. Innovative and smart growth principles such as jobs/housing balance, alternative and non-polluting modes of travel, emissions reductions, habitat and open space preservation, energy conservation measures, sustainability principles, and an adequate mix of economic and residential opportunities;
   b. Improved circulation pattern and infrastructure to accommodate all modes of travel including bicycles, pedestrians, wheelchairs, electric vehicles, and transit.

7. Include a mix of residential densities and land use types in the specific plan area (GP Policies COS-5.4, LU-6.2).

8. Consider including energy efficiency building features to be consistent with General Plan Policies supporting Global Warming and Energy Conservation (GP Goal COS-7).

9. All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800. A list of specific rules that may relate to construction activities or building design is attached for your reference.

I look forward to receiving project related documents as they are developed. Please contact me at 916-874-4881 or khuss@airquality.org if you have any questions regarding these recommendations.

Sincerely,

Karen Huss
Associate Air Quality Planner/Analyst
Land Use and Mobile Sources Division

Attachment

Cc: Larry Robinson, SMAQMD
    Cindy Gnos, Raney Planning and Management
    Kimberlie Orosco, South County Transit Link
SMAQMD Rules & Regulations Statement (revised 3/12)

The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at [www.airquality.org](http://www.airquality.org) or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

**Rule 201: General Permit Requirements.** Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration. Other general types of uses that require a permit include, but are not limited to dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

**Rule 403: Fugitive Dust.** The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

**Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour.** The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

**Rule 417: Wood Burning Appliances.** This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

**Rule 442: Architectural Coatings.** The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

**Rule 460: Adhesives and Sealants.** The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

**Rule 902: Asbestos.** The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

**Naturally Occurring Asbestos:** The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas "Moderately Likely to Contain Asbestos" within eastern Sacramento County. Asbestos Airborne Toxic Control Measures, Section 93105 & 93106 contain specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.