January 10, 2013

SENT VIA E-MAIL ONLY

Ms. Sandra Kiriu, Community Development Director
Galt Planning Department
495 Industrial Drive
Galt, CA 95632

Galt Entertainment Center Project Mitigated Negative Declaration (SAC201201439)

Dear Ms. Kiriu:

Thank you for providing the Galt Entertainment Center Project Mitigated Negative Declaration (MND) to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. The proposed project includes a two story entertainment center located in Galt’s historic downtown with movie theaters, bowling lanes, video arcade/laser tag, restaurant and sports lounge. Staff comments follow.

1. SMAQMD compliments Galt for promoting this redevelopment/infill project because it will provide a local destination for residents that currently must travel outside of the city for this type of entertainment.

2. The City states there is adequate bicycle parking existing within 500 feet of the project due to an 11-bike capacity rack located at Fourth and C Streets (page 52). SMAQMD encourages Galt to review CAL Green Code Section 5.106.4 regarding bicycle parking to ensure the project has adequate and conveniently located short and long term parking. The CAL Green Code is more stringent than Galt’s current requirements for bicycle parking.

3. Although Galt doesn’t currently have a fixed route transit system, the SMAQMD encourages Galt to provide a bus stop and/or shelter for transit use and information regarding dial-a-ride services as part of this project to promote alternative modes of transportation for entertainment center users.

4. The CalEEMod analysis should be updated to include total daily trips/unit/day rather than the peak hour trips/unit. Currently the emissions from the project are being underestimated.

5. As a result of comment #4 above, the Greenhouse Gas Emissions discussion may need updated once emissions are recalculated.

6. Since demolition activities are part of the proposed project, demolition specifications should be included in the CalEEMod analysis to estimate fugitive dust emissions from those activities.

7. Chapter 4 of SMAQMD’s Guide to Air Quality Assessment in Sacramento County allows emission credit for the operation of existing uses on a project site that meet certain criteria. The SMAQMD recommends subtracting existing emissions levels from the emissions levels estimated for the new proposed project only if the existing emission sources were operational at the time that the Notice of Preparation (NOP) for the CEQA document on the new proposed project was circulated and the existing emissions would continue if the proposed redevelopment project is not approved. Since some of the existing buildings were vacant (as noted on page 27), the existing emissions credit being provided may be overestimated.
8. SMAQMD rules apply to all projects at the time of construction. A list of the most common rules that may apply is attached. A complete list of all SMAQMD rules is available at [www.airquality.org](http://www.airquality.org) or by calling 916-874-4800.

Please contact me at 916-874-4881 or khuss@airquality.org if you have any questions or need clarification regarding this letter.

Sincerely,

Karen Huss
Associate Air Quality Planner/Analyst

Attachment

Cc: Larry Robinson, SMAQMD
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 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.