January 25, 2012

SENT VIA E-MAIL ONLY

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

Conceptual Simmerhorn Commercial Shopping Center Project
Initial Study/Mitigated Negative Declaration (SAC200400258E)

Dear Ms. Kiriu:

Thank you for providing the draft Initial Study/Mitigated Negative Declaration for the Simmerhorn project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD staff comments on the project and document follow.

1. Clarify that the greenhouse gas emissions reported for the project are metric tons and not million tons (page 29).
2. Mitigation measure #2 regarding construction emissions should include the project developer as a responsible party (MMRP page 2).
3. The timing of compliance for mitigation measure #3 regarding construction mitigation fees should be prior to construction occurring at the site. Would the appropriate timing be prior to the issue of a grading permit (MMRP page 2)?
4. The timing of compliance for mitigation measure #4 regarding SMAQMD rules should be prior to and during construction as well as issuance of building permit (MMRP page 2).
5. The second part of mitigation measure #4 requires air emissions modeling for future development at the site. This requirement should be its own mitigation measure. Modeling supports mitigation measures #1-3 and seems less related to implementing #4. Additionally, the timing of compliance for the modeling should be prior to site plan approval (Page 15 and MMRP page 2).
6. Since this project will have diesel powered commercial delivery trucks, the document should acknowledge the emissions of diesel particulate matter and the existing and future sensitive receptors. Mitigation measure #5 could be expanded to specifically address delivery truck routes and location of docks to minimize exposure (Page 15 and MMRP page 2).
7. Mitigation measure #18 requiring development of a greenhouse gas emissions (GHG) reduction plan (of 30 percent) for the project prior to site plan approval will adequately address GHG impacts and be consistent with the intent of AB32 and the ARB Scoping Plan (Page 29 and MMRP page 2).
8. SMAQMD encourages the City of Galt to adopt a climate action plan (CAP), but until that CAP is developed and adopted, it is too speculative to state that the CAP requirements should supersede the GHG reductions required by mitigation measure #18. Language could be added to mitigation measure #18 to ensure compliance with the CAP will obtain an equivalent amount of GHG reductions from the project.

9. The City of Galt recently received a SACOG Salutes Special Recognition Award for being a small city implementing Blueprint principles for the Galt Place project. Since the Simmerhorn project doesn’t currently have a development proposal, the SMAQMD would like to encourage the City of Galt to take this opportunity to continue promoting sustainable development rather than settle for a typical suburban shopping center. Galt could encourage a potential developer to bring forward an innovative project that will mixes uses, provide excellent walking, biking and transit infrastructure, be fully connected to the rest of the city, reduce land dedicated to parking, and contain buildings that have interesting architecture and energy efficiency features.

The SMAQMD appreciates the level of communication and review that the City of Galt provides for its projects and Galt’s attention to air quality concerns. If you have any questions regarding these comments please contact me at 916-874-4881 or khuss@airquality.org.

Sincerely,

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

Cc: Larry Robinson, SMAQMD