April 9, 2012

SENT VIA E-MAIL ONLY

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

City of Galt Utility Master Plans Initial Study/Mitigated Negative Declaration (SAC201201420)

Dear Mr. Erias:

Thank you for providing the City of Galt Utility Master Plans Initial Study/Mitigated Negative Declaration to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD staff comments follow.

1. Add policy COS-5.12, Construction Mitigation Fees and its description to the discussion of General Plan Policies that will be implemented to mitigate air quality impacts (page 32, section a).
2. Sacramento County is designated as a severe non-attainment area for the federal ozone standard, not a serious one as noted (page 33, second paragraph).
3. Clarify that the SMAQMD does not have a mass emission threshold for fugitive dust emissions, but does have concentration based thresholds for particulate matter, which are the California Ambient Air Quality Standards for both PM$_{10}$ and PM$_{2.5}$ (page 33, second paragraph).
4. Correct BAAQMD reference for dust control measures (page 33, construction emissions paragraph).
5. Integrate the SMAQMD’s Basic Construction Emission Control Practices and Enhanced Fugitive PM Dust Control Practices (attached) into mitigation measure III-1 (page 34).
6. Construction emissions from the three utility master plans when taken as a whole, contribute cumulatively to the air basin. Mitigating the emissions from all the projects that result from the utility master plans with the SMAQMD’s Enhanced Exhaust Control Practices (attached) is recommended.
7. Please note that the project sizes based on SMAQMD’s NOx screening table noted in mitigation measure III-2 at which an air quality analysis would be conducted (page 34) have caveats for use that should be incorporated into this mitigation measure:
the project doesn’t include demolition activities; no overlapping phases; no compact construction schedule; not disturbing greater than 15 acres per day; doesn’t import or export soil requiring a significant amount of haul truck activity; and no cut and fill operations. If any of these conditions exist for a project even if under these size thresholds, an air quality analysis needs to be conducted and mitigation included if the SMAQMD construction thresholds of significance are exceeded. Galt should consider requiring an air quality analysis on each project prior to approval of final design-level plans rather than trying to screen projects out using the sizes currently listed.

8. Clarify that mitigation measure III-2 would implement SMAQMD regulations and mitigation measures, consistent with City of Galt Policies noted on page 32. Please add the SMAQMD’s mitigation measures that would be implemented (in addition to the dust control in mitigation measure III-1) include the Enhanced Exhaust Control Practices (attached) and mitigation fees for emissions that still exceed the SMAQMD’s construction thresholds of significance after applying the Enhanced Exhaust Control Practices.

9. Correct reference to SMAQMD’s permitting rule, which is Rule 201 (page 35).

10. The SMAQMD appreciates the inclusion of Best Management Practices to reduce greenhouse gas emissions from utility master plan construction projects (mitigation measure VII-1, pages 49-50).

11. Include a mitigation measure that will address GHG from operational activities if the air quality analysis (noted on page 48, conclusion paragraph) indicates the emissions are significant. Galt could utilize the language already included on page 48 in the second paragraph of the Long Term GHG Emissions section regarding future development projects complying with CARB’s AB32 Scoping Plan, etc.

12. 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. Attached is a list of specific rules that may relate to construction activities and building design.

Please contact me at 916-874-4881 or khuss@airquality.org if you have any questions regarding these comments.

Sincerely,

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

Attachments

Cc: Larry Robinson, SMAQMD
BASIC CONSTRUCTION EMISSION CONTROL PRACTICES

The following practices are considered feasible for controlling fugitive dust from a construction site. Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

- Maintain all construction equipment in proper working condition according to manufacturer’s specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Lead agencies may add these emission control practices as Conditions of Approval (COA) or include in a Mitigation Monitoring and Reporting Program (MMRP).

ENHANCED FUGITIVE PM DUST CONTROL PRACTICES

SOIL DISTURBANCE AREAS

- Water exposed soil with adequate frequency for continued moist soil. However, do not overwater to the extent that sediment flows off the site.
- Suspend excavation, grading, and/or demolition activity when wind speeds exceed 20 mph.
- Install wind breaks (e.g., plant trees, solid fencing) on windward side(s) of construction areas.

- Plant vegetative ground cover (fast-germinating native grass seed) in disturbed areas as soon as possible. Water appropriately until vegetation is established.

**Unpaved Roads (Entrained Road Dust)**

- Install wheel washers for all exiting trucks, or wash off all trucks and equipment leaving the site.

- Treat site accesses to a distance of 100 feet from the paved road with a 6 to 12-inch layer of wood chips, mulch, or gravel to reduce generation of road dust and road dust carryout onto public roads.

- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The phone number of the District shall also be visible to ensure compliance.

**Enhanced Exhaust Control Practices**

- The project shall provide a plan for approval by the District demonstrating that the heavy-duty (50 horsepower [hp] or more) off-road vehicles to be used in the construction project, including owned, leased, and subcontractor vehicles, will achieve a project wide fleet-average 20% NO$_x$ reduction and 45% particulate reduction compared to the most recent California Air Resources Board (ARB) fleet average. Acceptable options for reducing emissions may include use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, and/or other options as they become available. The District’s [Construction Mitigation Calculator](#) can be used to identify an equipment fleet that achieves this reduction.

- The project shall ensure that emissions from all off-road diesel powered equipment used on the project site do not exceed 40% opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately. Non-compliant equipment will be documented and a summary provided to the lead agency and District monthly. A visual survey of all in-operation equipment shall be made at least weekly, and a monthly summary of the visual survey results shall be submitted throughout the duration of the project, except that the monthly summary shall not be required for any 30-day period in which no construction activity occurs. The monthly summary shall include the quantity and type of vehicles surveyed as well as the dates of each survey. The District and/or other officials may conduct periodic site inspections to determine compliance. Nothing in this section shall supercede other District or state rules or regulations.

- If at the time of construction, the District has adopted a regulation applicable to construction emissions, compliance with the regulation may completely or partially replace this mitigation. Consultation with the District prior to construction will be necessary to make this determination.
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 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.