

Appendix A

Notice of Preparation



APPENDIX A

Notice of Preparation

Notice of Preparation

In accordance with Section 15082(a) of the CEQA Guidelines, the City prepared and circulated a Notice of Preparation (NOP) of a draft EIR for the Proposed Project. The NOP was circulated for a 30-day comment period, which began on August 15, 2007, and ended on September 13, 2007.

This appendix includes the following information:

- Notice of Preparation (dated August 2007); and
- Copies of comment letters received during the NOP comment period.



City of Galt General Plan Update: 2030

August 13, 2007

NOTICE OF PREPARATION

(California Code of Regulations, Title 14, (CEQA Guidelines) Sections 15082(a), 15103, 15375)

To: State Agencies
Responsible Agencies
Local and Public Agencies
Trustee Agencies
Interested Parties

From: Sandra Kiriu, AICP
City of Galt Planning Department
495 Industrial Drive
Galt, CA 95632
Phone: (209) 366-7230
Email: skiriu@ci.galt.ca.us
Fax: (209) 744-1642

Subject: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT FOR THE GALT GENERAL PLAN UPDATE: 2030

Project Title: City of Galt General Plan Update: 2030

Project Applicant: City of Galt Planning Department

Project Location: City of Galt, Sacramento County

The City of Galt (City) will be the Lead Agency for the preparation of an Environmental Impact Report (EIR) for the City's General Plan Update: 2030 project (Proposed Project). We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the Proposed Project. Your agency may need to use the EIR prepared by our agency when considering relevant permits or other approvals for the Proposed Project. The City is also seeking input from residents, property owners, and concerned citizens as to the issues that should be addressed in the EIR.

The project description, location, and the probable/potential environmental effects of the Proposed Project are contained in the attached materials. An initial study was not prepared for this NOP; however, a summary of the environmental issues to be analyzed in the EIR is provided as part of the attached information.

Due to the time limits mandated by State Law, your response must be sent at the earliest possible date, but not later than September 13, 2007. Please send your written comments to Sandra Kiriu, Principal Planner, City of Galt Planning Department; at the address, email, or fax number shown above. We will need the name for a contact person in your agency. For more information on the Galt General Plan Update, please visit our website at <http://www.ci.galt.ca.us> and click on the General Plan Update icon.

Additionally, the City of Galt has set up a meeting to receive public input on the scope of the General Plan EIR. At this meeting, individuals, agencies, and organizations can provide the City with their input on the content and analysis conducted for the General Plan EIR. **The EIR scoping meeting will be held at the Anthony Pescetti Community Room, Galt Police Department, 455 Industrial Drive, Galt, CA on September 12, 2007 at 7:00pm.**

Signature: _____

Date: _____

Sandra Kiriu, AICP
Principal Planner, City of Galt Planning Department
(209) 366-7230

PROJECT OVERVIEW



1. Project Title

City of Galt General Plan Update: 2030

2. Lead Agency

City of Galt
Planning Department
495 Industrial Drive
Galt, CA 95632

3. Contact Person

Sandra Kiriu, AICP
Principal Planner, Planning Department
(209) 366-7230

4. Project Location

The City of Galt is located on State Route 99 in southern Sacramento County between the cities of Elk Grove and Lodi (see Figure 1). The City is located 26 miles south of the Sacramento metro area and 24 miles north of the Stockton metro area. State Route 104 (Twin Cities Road) connects Galt west to I-5 and east to Ione and the Sierra Nevada Mountains. Galt is also located approximately 100 miles east of the San Francisco Bay Area. The City is surrounded by agricultural lands and the Cosumnes River Preserve.

5. Project Sponsor

City of Galt
Planning Department
495 Industrial Drive
Galt, CA 95632

6. General Plan Designations

Multiple designations

7. Zoning Designations

Multiple designations

8. Description of Project

The Proposed Project represents a comprehensive update to the City's existing General Plan. The Proposed Project will include an updated Goals and Policies Report, an updated land use diagram, an updated circulation plan, and expansion of the City's existing Sphere of Influence (SOI).

Every City and County in California is required by State law (Government Code Section 65300) to prepare and maintain a planning document called a general plan. A general plan is designed to serve as the jurisdiction's "constitution" or "blueprint" for community land use and resource conservation decisions. Decision makers in the

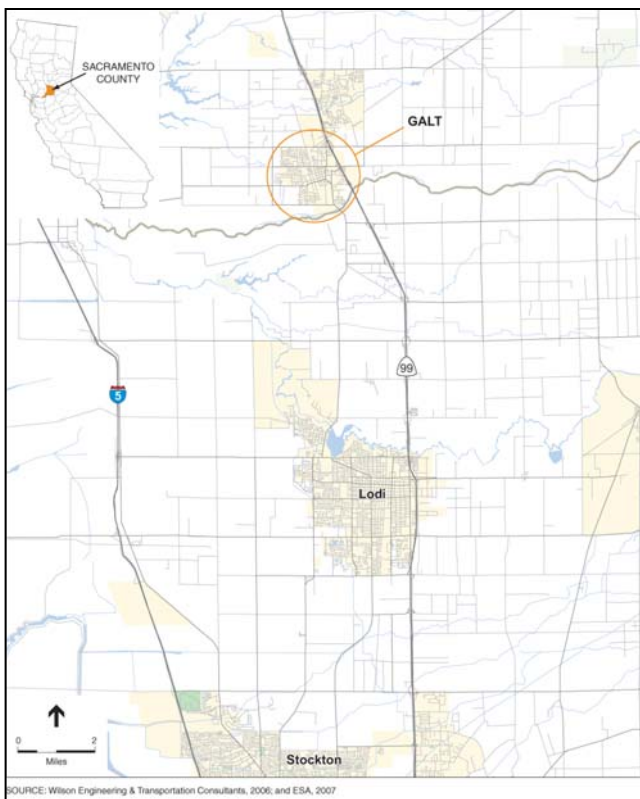


Figure 1. City of Galt Regional Location

City will use the Galt General Plan to provide direction when making land use and public service decisions. All specific plans, subdivisions, public works projects, and zoning decisions must be consistent with the City's General Plan.

The general plan must address the seven topics (referred to as "elements") of land use, circulation, housing, open space, conservation, safety, and noise (Government Code Section 65302), to the extent that the topics are locally relevant. It may also include other topics of local interest, as chosen by the City (Government Code Section 65303). The City has chosen to include several additional elements including a Historic Element, Administration Element, Community Character Element, Economic Development Element and a Public Facilities and Services Element. A complete description of all the elements that comprise the Proposed Project are identified on page 5 of this NOP.

Based on community input received during the public participation process and an analysis of existing conditions in the City, several objectives were identified and used to develop the goals, policies, and implementation programs for the draft General Plan as well as the draft Land Use Diagram. These objectives are summarized in Table 1 below.

Guiding Principles of the General Plan

The major theme of the General Plan is to retain and build upon Galt's small-town and neighborhood qualities while achieving an economically-healthy and self-sufficient community. With this theme in mind, the following guiding principles provide the foundation for the General Plan. The following principles were developed through the public workshops, City Council and Planning Commission meetings and stakeholder meetings:

- Provide a mix of residential density choices while preserving the traditional character of Galt.
- Population projections based on the 2030 General Plan is approximately 50,950 people.
- Preserve agriculture and open space land north of Laguna and Skunk Creeks.
- Promote economic and job growth along Highway 99 and the Twin Cities Road corridor.
- Preserve land surrounding the wastewater treatment plant.
- Distribute school and public/quasi-public uses evenly and equitable throughout the General Plan area.

Table 1 General Plan Objectives

| | |
|--|---|
| Urban Form/Growth | New growth should provide a balanced mix of land uses while preserving rural communities and revitalizing the existing downtown area. |
| Circulation | Existing traffic and parking facilities improvements must be made to meet the needs of visitors, businesses and residents in addition to planning for future expansion of transit options. |
| Infrastructure & Utilities Expansion | Adequate provision of infrastructure and utility services is necessary to keep pace with the City's future growth. |
| Economic Development | Development of new business, retail, commercial services and expansion of the City's economic base is necessary to provide new jobs and shopping opportunities within the City. |
| Agricultural Land & Wildlife Habitat Protection | Protection of agricultural residential areas and preserving the rural setting of the community is essential in preserving productive agricultural land and protecting valuable wildlife habitat in the vicinity of the community. |
| Community Image & Identity | The community's image as a small town is integral to sustaining and developing a distinct identity for the City of Galt. |

Planning Boundaries

The Planning Area refers to the geographic area that will be directly addressed by the general plan, and typically encompasses the city limits and potentially annexable land within its sphere of influence. The Planning Area for the Proposed Project extends from the Sacramento-San Joaquin county line in the south (e.g., Dry Creek), Laguna and Skunk Creeks in the north, Cherokee Road in the east, and Sargent/Midway Road in the west. This boundary is shown in Figure 3. The Planning Area covers approximately 7,670 acres, or twelve square miles. The area north of Twin Cities Road will require a Sphere of Influence expansion.

Buildout under the Draft General Plan

A draft land use diagram for the Proposed Project is provided in Figure 3. This diagram closely reflects Alternative 2, one of several alternatives developed from input received at the General Plan Workshops and City Council, Planning Commission, and stakeholder meetings. Other alternatives to be analyzed in the EIR are discussed later in this notice. As shown in the figure, the Proposed Project is comprised of various land use designations. Table 2 provides a list of these designated land uses along with an estimate of acreage attributed to each land use.

The EIR assumes that overall buildout of the Proposed Project will occur by 2030. Proposed development will be incremental and timed in response to market conditions. The Proposed Project will include policies intended to control the amount and location of new growth.



| Table 2 Designated Land Uses Proposed under the General Plan: 2030 | |
|--|--------------|
| Designated Land Use | Acreage |
| Rural Residential | 1,430 |
| Residential Estates | 185 |
| Low Density Residential | 2,361 |
| Medium Density Residential | 344 |
| Medium-Hi Density Residential | 70 |
| High Density Residential | 225 |
| Commercial | 755 |
| Office Professional | 136 |
| Light Industrial | 891 |
| Public/Quasi-Public | 495 |
| Parks | 159 |
| Open Space | 709 |
| Total | 7,670 |

Source: Mintier and Associates 2007

General Plan Organization

The Goals and Policies Report sets out a hierarchy of goals, policies, and implementation measures designed to guide future development in the City. To provide a comprehensive and easy-to-use format, the Goals and Policies Report is divided into ten elements. Each element contains a set of related topics that have been grouped together based on the close relationship of those topics.

Each element will start with an overview of the topics contained in that section. The individual topics will build on the General Plan objectives identified in Table 1. Each element contains a set of goals, policies, and implementation measures that will be used to guide the future of the City. The ten elements and the key topics that comprise each element are summarized in Figure 2. The Housing Element is governed by separate state laws and is on a separate mandated update schedule, currently required by July 2008.



Figure 3. City of Galt General Plan: 2030 Elements and Key Topics

General Plan Documents

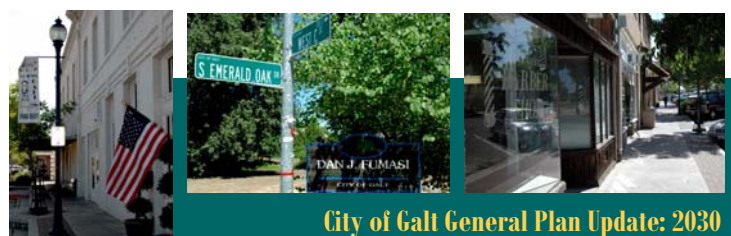
The General Plan Update includes the preparation of five documents, divided into two sets: General Plan Documents (adopted) and General Plan supporting documents used to assist in the decision making process.

General Plan Adopted Documents:

- **Goals and Policies Report.** This report is the essence of the General Plan. It contains the goals and policies that will guide future development within the City and its Planning Area. This document also identifies implementation measures and includes land use and circulation diagrams.
- **Existing Conditions Report.** This report provides a detailed description of the environmental, economic, land use, public facility, and service conditions that exist within the City’s Planning Area.

General Plan Supporting Documents:

- **Expanded Study Area Report.** This report provides a discussion of the land and circulation alternatives considered for the General Plan Update, which includes the Expanded Study Area Alternative. [Previously released December 2005]
- **Environmental Impact Report (EIR).** An EIR will be prepared to meet the requirements of the California Environmental Quality Act (CEQA). Information presented in the EIR will be used to better understand the potential environmental impacts associated with implementation of the General Plan.



City of Galt General Plan Update: 2030

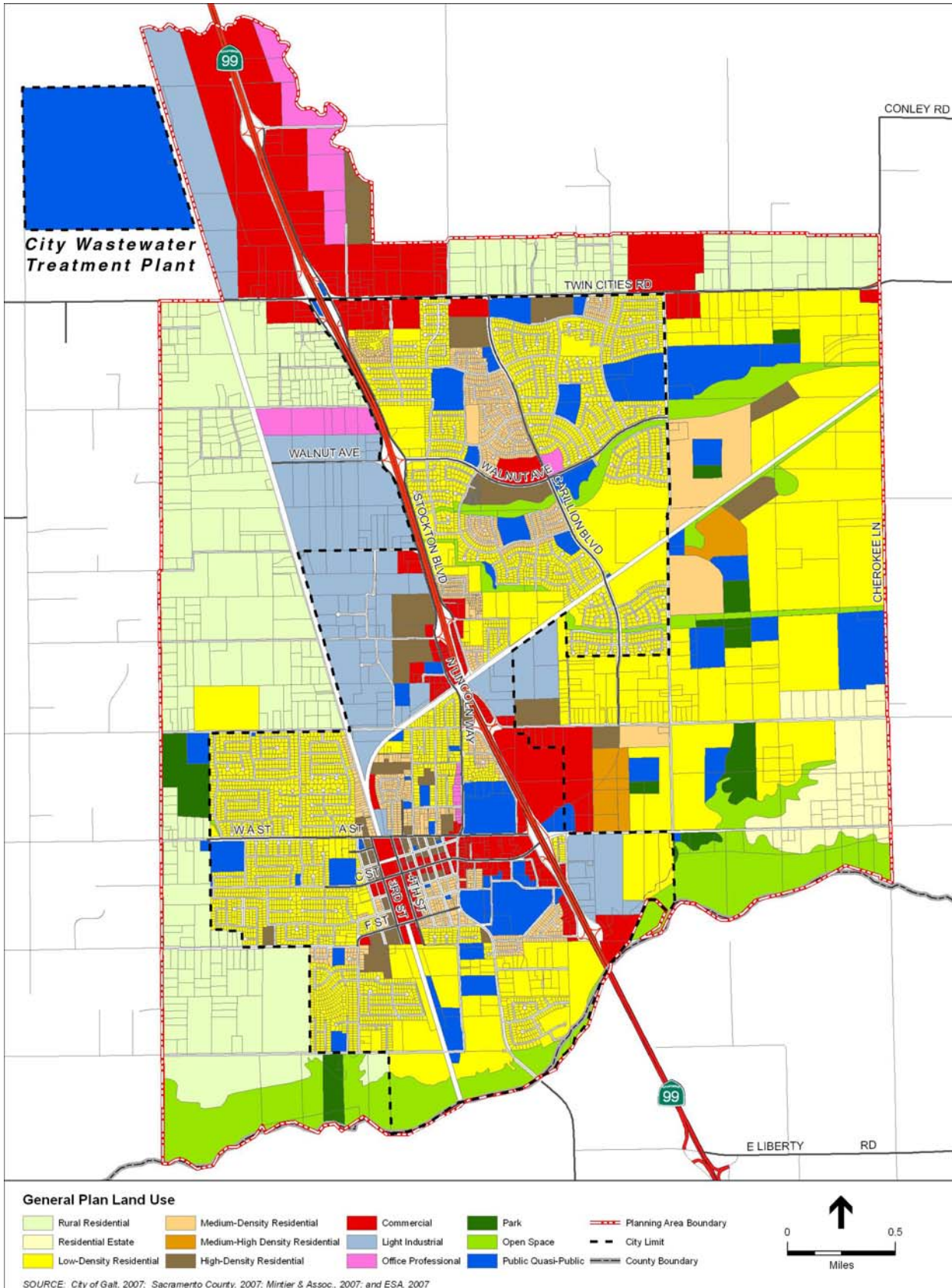


Figure 3. City Council Preferred Land Use Alternative

Public Input into General Plan Development

Between December 2003 and August 2007, the City held six community workshops, four focus group meetings, eight joint City Council and Planning Commission workshops, 24 special City Council meetings (i.e., Sacramento County LAFCO, surrounding property owners, stakeholders, environmental groups, etc.). This public input has contributed to the draft Goals and Policies Report and the draft Circulation/Land Use Diagram Analyzed in the draft EIR.

Alternatives to the Proposed Project

CEQA requires that an EIR consider alternatives to a project (Section 15126 [a]). According to CEQA Guidelines, the range of alternatives "shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the significant impacts" (Section 15126 [d] [2]). A short description of each of the alternatives is included below.

The following alternatives are currently being proposed for evaluation in the EIR for the Proposed Project (which includes the Preferred Land Use Alternative identified in Figure 3):

- Alternative 1—No Project (Build-out of Existing General Plan)
- Alternative 2—Compact Growth
- Alternative 3—Expanded Study Area

Alternative 1 No Project (Build-out of Existing General Plan)

CEQA requires that the EIR for a project consider a "No Project" alternative. The No Project alternative assumes that the Proposed Project is not adopted by the City. For the purposes of this EIR, it is assumed that in the absence of the Proposed Project, the existing 1990 General Plan would continue to guide the City's development. Full build-out of the existing General Plan would include both currently approved projects, plus a limited amount of additional development permitted under the existing General Plan in the future.

Alternative 2 Compact Growth

Alternative 2 emphasizes compact development by allocating most growth close to the existing business and civic core, around downtown and the Central Galt interchange. New growth areas will be integrated into distinct neighborhoods with a mix of uses. Pedestrian and bicycle-friendly facilities are also incorporated into this alternative. The population buildout would be approximately 50,950 people.

Alternative 3 Expanded Study Area

Alternative 3 represents complete buildout of the General Plan Study Area. This alternative would build upon the land uses identified in alternative 2, but growth would also extend to the General Plan Planning Area boundary. The majority of the land uses that would occur beyond the existing City limits would be Low Density Residential. This alternative would provide for a buildout population of approximately 73,000 people.



City of Galt General Plan Update: 2030

Potential Environmental Impacts

The EIR prepared for the City of Galt General Plan Update: 2030 will address the range of impacts that could result from adoption and implementation of the Proposed Project. This section provides a short summary of the potential impacts that will be analyzed in the EIR.

Aesthetics

The project may:

- Have adverse effects on scenic vistas.
- Damage scenic resources.
- Degrade the existing visual character or quality of the City and its surroundings.
- Create a new source of substantial light or glare.

Agriculture Resources

The project may:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses.
- Conflict with existing agricultural use.
- Involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to non-agricultural use.

Air Quality

The project may:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Result in a net increase of any criteria pollutant for which the project region is non-attainment under the federal or state ambient air quality standard.
- Expose sensitive receptors to substantial pollutant concentrations.
- Create objectionable odors affecting a substantial number of people.
- Result in an increase in greenhouse gas emissions that would contribute to global warming conditions.

Biological Resources

The project may:

- Have a substantial adverse effect on any species identified as a candidate for special or sensitive status in local or regional plans,

policies, or regulations, or by the California Dept. of Fish and Game or U.S. Fish and Wildlife Service.

- Have a substantial adverse effect on riparian habitat.
- Have a substantial adverse effect on federally protect wetlands.
- Interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

Cultural Resources

The project may:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.

Geology and Soils

The project may:

- Result in substantial soil erosion or the loss of topsoil.
- Be located on a geological unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.
- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994).

Hazards and Hazardous Materials

The project may:

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures to a significant risk of loss, injury, or death involving earthquakes, or upsets due to earthquakes or floods.

Hydrology and Water Quality

The project may:

- Substantially affect groundwater supplies or interfere with groundwater recharge.
- Substantially alter the existing drainage patterns in a manner that could result in substantial erosion or siltation .
- Substantially alter the existing drainage pattern of the site or area in a manner that could result in flooding on or off site.
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.
- Otherwise substantially degrade water quality.
- Place housing within a 100-year flood hazard area.
- Place within a 100-year flood hazard area structures that would impede or redirect flood flows.
- Expose people or structures to a significant risk of loss, injury, or death involving flooding.
- Inundated by seiche, tsunami, or mudflow.

Land Use

The project may:

- Conflict with an applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating a significant environmental effect.

Mineral Resources

The project may:

- Result in the loss of availability of a known mineral resource that would be of value to the region.
- Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Noise

The project may:

- Expose persons to excessive groundborne vibration or groundborne noise levels.
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- For a project located within an airport land use plan expose people residing or working in the project area to excessive noise levels.

Population and Housing

The project may:

- Induce substantial population growth in an area, either directly or indirectly.

Public Services

The project may:

- Create an increase in demand for new or expanded public facilities and services such as Fire protection, Police protection, Schools, Parks, and other public facilities, which may cause potentially significant environmental impacts.

Recreation

The project may:

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.



City of Galt General Plan Update: 2030

Transportation/Traffic

The Project may:

- Cause an increase in traffic that is substantial in relation to the existing traffic load and capacity of the street system.
- Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways.

Utilities and Service Systems

The project may:

- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects .
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.
- Result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
- Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs.

Michael R. Eaton
Pox 336
Galt, CA 95632



August 17, 2007

Sandra Kuriu
Principal Planner
City of Galt
495 Industrial Drive
Galt, CA 95632

Re: Notice of Preparation, General Plan Update EIR

Dear Sandy:

I have reviewed the NOP. In general I concur with the scope of potential impacts identified, and I look forward to reviewing the DEIR. I have a few specific comments which I think appropriate to share now in the interest of an efficient process.

1. Transportation and Air Quality Impacts

The NOP rightly identifies air pollution emissions (including greenhouse gas emissions) and traffic congestion as potentially major impacts of general plan buildout. SACOG "Blueprint" analytical tools provide a means for evaluating the traffic and emissions generation from alternative densities and land use configurations. I would strongly urge the City to explicitly include Blueprint-consistent development concepts (including higher densities and land use configurations that promote "walkability") in both the base case and compact development case, and to use the Blueprint analytical tools to assess the potential for reducing or mitigating traffic, air pollution, and climate impacts.

2. Biological and Agricultural Impacts

Development as contemplated by the draft General Plan will result in the loss of important foraging areas for a suite of avian species, including the Swainson's hawk. Currently, the City requires developers of open land to mitigate for the loss of open land at a ratio of one acre protected (through an appropriate easement or other mechanism) to one acre developed. We urge the preparers of the DEIR to explicitly address the extent to which a combination of strategies that encourage or require more efficient land use patterns and require appropriate mitigation will help avoid or mitigate impacts to these species.

3. Impacts of ongoing and increased rates of groundwater pumping on aquatic systems and species

Groundwater pumping by the City and others have created a major “cone of depression” within the groundwater basin south of the Cosumnes River and north of Dry Creek. Lands currently contemplated for urbanization under the draft general plan are generally not in irrigation; therefore new water demands within the City will generally create a new net demand upon the aquifer. This pumping by the City and others has contributed to a loss of flow, and impacted the seasonality of flow, within the Cosumnes River, to the serious detriment of that river’s population of Chinook salmon. In addition, lower groundwater levels impact flow in Badger and Laguna Creeks. Badger Creek has a significant population of Giant Garter Snake, a federally-listed endangered species; declining groundwater levels have significantly reduced the extent of suitable habitat for that species, and the population is at risk if these trends continue.

These groundwater issues have an extensive administrative and judicial record within Sacramento County. I would urge you to review the Environmental Impact Report for the County’s Zone 40 Master Plan, including comments and responses to comments. Of particular relevance to the issue for Galt are comment letters of the California Department of Fish and Game, US Fish and Wildlife Service, The Nature Conservancy, and the Natural Heritage Institute, many of which include expert analysis addressing the issue of impacts on aquatic systems. This issue was, as you are probably aware, litigated at length, with the resulting California Supreme Court decision earlier this year in the case of Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova. In that case, the Court found that the County and City erred in assuming the availability of additional groundwater without addressing and mitigating for the impacts of withdrawing that groundwater; the case focused specifically on the impacts to the Cosumnes River and associated aquatic ecosystem values. Unless the City can demonstrate through analysis that it’s groundwater withdrawal has no impact on the aquatic systems in questions, I believe that the case law in Vineyard Area Citizens effectively forecloses for Galt the option of continuing to grow based solely on the increased utilization of groundwater, and would urge you to take a close look at that issue.

Galt has abundant opportunity to move toward a system of conjunctive use of groundwater and surface water, in cooperation with other entities. In particular, Galt should consider working actively with the South Sacramento County Agricultural Water Authority (SCCAWA, a joint powers authority comprising three agricultural water districts). SCCAWA is actively planning for development of a conjunctive use program, and the participation of a major municipal partner would help them achieve their objectives.

Similarly, SCCAWA is currently working with Sacramento County, the Water Forum, and other stakeholders to develop a system of groundwater governance for the Galt sub-basin; groundwater governance is a prerequisite to implementation of an effective conjunctive use program. The City has been a nominal participant in this collaborative process; the City’s substantive participation (including financial support for the process

and its supporting analysis commensurate with the City's needs and potential benefit) would do a great deal to move the process forward, and should be considered alongside conjunctive use as a potential mitigation measure.

Again, I appreciate your consideration of these comments and look forward to reviewing the DEIR.

Sincerely,

A handwritten signature in black ink, appearing to read "MR Eaton", written in a cursive style.

Michael R. Eaton

August 30, 2007

Sandra Kiriu
Principal Planner
City of Galt Planning Department
495 Industrial Drive
Galt, CA 95632



Subject: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT
REPORT FOR THE GALT GENERAL PLAN UPDATE: 2030

Dear Mrs. Kiriu:

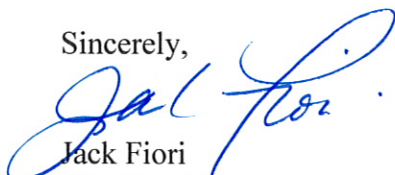
We are in receipt of your NOP regarding the preparation of an EIR for the General Plan Update. In that letter you request input on the scope and content of environmental information to be considered in as much as it may affect or influence our operations within the City of Galt now or in the future.

As you know, California Waste Recovery Systems attempted to site and permit a solid waste transfer station in the Galt Industrial Park. After four years of efforts, earlier this year the project was abandoned when the conditional use permit was denied because of concerns due solely to location. During the various public hearings, Galt residents, City Staff and elected officials seemed unified on the variety of benefits to the City that would come from a local transfer station; however, location became the overriding issue.

Because of these community concerns and after the Public Hearings, California Waste Recovery Systems stated publicly that we will not purchase another site in Galt and endeavor to permit and construct a transfer station until the City of Galt can identify a suitable location that has all necessary use permits and entitlements.

For reasons which include; rate stability, disposal demands for household hazardous waste, universal waste, and electronic waste, overall customer convenience, and the ability of the City to adopt to changing landfill diversion requirements, we continue to believe that the City of Galt should have a solid waste transfer station. Therefore, we propose that identification of a transfer station site be included in the project description for the environmental impact report.

Sincerely,


Jack Fiori
Vice President

September 7, 2007

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

**Notice of Preparation of an Environmental Impact Report
for the Galt General Plan Update: 2030 (SAC200400168f)**

Dear Ms. Kiriu:

Thank you for the opportunity to review and comment on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Galt General Plan Update: 2030. The Sacramento Metropolitan Air Quality Management District (SMAQMD) staff suggests the EIR address the following topics.

1. Consistency with SACOG Blueprint Preferred Scenario

There is no discussion in the NOP regarding a comparison of the SACOG Blueprint Preferred Scenario and the Preferred Land Use Alternative approved by the City Council in March 2007. For air quality purposes, it is important that projected growth is allocated in such a way to achieve the transportation improvements associated with the Blueprint Preferred Scenario. For example, it is critical that the City not only plan for growth in population and employment that is consistent with SACOG projections, but also ensure that the resulting transportation outcomes achieve the improvements associated with the Blueprint Preferred Scenario. SMAQMD staff recommends that the EIR include transportation related performance factors that measure consistency between the General Plan Land Use Alternative and the Blueprint Preferred Scenario. Examples could include comparisons of factors such as vehicle miles traveled (VMT) per household or VMT per person, based on travel demand model forecasting. The transportation outcomes supported by the General Plan are directly related to mobile emissions which are critical to achieving federal and state ambient air quality standards.

2. Climate Change

SMAQMD encourages the City to include a discussion of climate change in the EIR. The emerging issue of climate change has gained a great deal of attention in the past several years. On September 27, 2006, the State of California passed into law AB32, the Global Warming Solutions Act of 2006 which requires the State to reduce its carbon emissions by approximately 25% by the year 2020. In addition, the California Attorney General filed suit against San Bernardino County on April 12, 2007 for failure to adequately address climate change in the San Bernardino County General Plan EIR. SMAQMD staff recommends that in addition to analyzing the air quality impacts related to emissions of ozone precursors, particulate matter, and other pollutants currently regulated by the California Clean Air Act and Federal Clean Air Act, the EIR should also provide an inventory of greenhouse gas emissions associated with the General Plan growth projections.

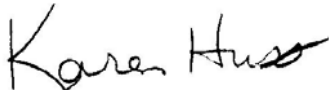
Because the General Plan is likely to result in local growth that will contribute to the global issue of climate change, the EIR should include an analysis of the cumulative effects of the General Plan on greenhouse gas emissions and global warming. The EIR should also identify feasible mitigation measures that could help to reduce identified cumulative effects. I have enclosed a copy of a letter which is being sent to all jurisdictions within the SMAQMD which discusses in further detail addressing climate change in CEQA documents.

3. Locating Sensitive Receptors Near Sources of Air Toxics

In April 2005, the California Air Resources Board released the *Air Quality and Land Use Handbook: A Community Health Perspective*. The ARB Handbook identifies a number of toxic emissions sources, including high volume roadways, and recommends that sensitive receptors, including residential developments, be located at a distance from the sources that reduces health risks related to toxic emissions. The ARB Handbook suggests that General Plans provide the "most effective mechanism" for dealing with sensitive land use compatibility issues. Specifically, the ARB Handbook encourages land use agencies to incorporate sustainable development and environmental justice policies from the 2003 General Plan Guidelines published by the Office of Planning and Research. SMAQMD provides additional guidance to local jurisdictions in the *Recommended Protocol For Evaluating The Location Of Sensitive Land Uses Adjacent To Major Roadways*. The SMAQMD Protocol provides guidance on how to assess the potential cancer risk of sensitive receptors exposed to diesel particulate matter from major roadways. The Protocol was endorsed by the AQMD Board of Directors on January 25, 2007.

SMAQMD staff will continue to work with City staff to develop a General Plan that maximizes overall improvements in air quality within the City of Galt and throughout the region. Please contact me if you have questions or would like additional information regarding these issues. I can be reached at (916) 874-4881 or khuss@airquality.org.

Sincerely,



Karen Huss
Associate Air Quality Planner/Analyst

Enclosure

cc: Larry Robinson, SMAQMD
Ron Maertz, SMAQMD

September 6, 2007

Subject: **Addressing Climate Change in CEQA Documents**

To whom it may concern:

Global warming is one of the most significant environmental issues facing the business and environmental community today. We now have sufficient knowledge of both the role of greenhouse gases (GHG) and the availability of mitigation measures to properly analyze the potential global warming impacts of projects under the California Environmental Quality Act (CEQA). The purpose of this letter is to provide interim recommendations for local agencies to use in analyzing and mitigating global warming impacts pending development of guidelines by the Office of Planning and Research as directed by SB 97.

The major anthropogenic (man-made) GHGs are carbon dioxide, methane, and nitrous oxide, and the primary sources of these emissions are vehicles (including trains and planes), energy plants, and industrial and agricultural activities. Consequently, GHG emissions may be increased through the approval of a wide variety of projects, including residential, commercial, and mixed-use developments, transportation system expansions, and other construction and development activities. Applying energy efficient building components, design, and siting practices to these projects can reduce these impacts. Since current emissions are already significantly effecting global warming, it is critical that these new projects, and others like them, be analyzed to determine whether they will worsen the warming process and whether there are mitigation measures available to reduce any impacts identified.

To date, local decision-making agencies, the District, the state, and the federal government have not developed specific GHG thresholds of significance for use in preparing environmental analyses under the California Environmental Quality Act (CEQA). The absence of thresholds, however, does not negate the CEQA mandate to analyze all potentially significant impacts, including emissions of greenhouse gases.

Agencies have the discretion to determine, based on a variety of factors, whether a particular impact is significant.¹ To insure consistency and fairness, the CEQA Guidelines encourage agencies to adopt significance thresholds.² Neither the Act nor the Guidelines, however, require the adoption of thresholds as a prerequisite to analyzing impacts. To the contrary, significance criteria are commonly developed by the experts that prepare the CEQA analysis, based on their assessment of the technical evidence.³ In fact, CEQA may require additional analysis even if a project meets an adopted standard, if other evidence indicates the project may nonetheless have a significant impact.⁴

¹ *National Parks & Conservation v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1356-1357 (agency may apply different thresholds depending on the nature of the area affected).

² 14 CCR 15064.7

³ 1 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act (Cont. Ed. Bar 2006) § 31.2, p. 621, citing *Napa Citizens for Honest Govt. v. Napa County Bd. Of Supervisors* (2001) 91 Cal.App.4th 342, 362 (significance standard for traffic developed by EIR drafters).


⁴ *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1380-1382 (project that meet FCC noise standards could still have a significant effect if it caused a substantial increase in the ambient noise levels for adjoining areas); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App. 4th 1099, 1109-1111 (project meeting hydrology significance thresholds could still have a potentially significant impact because thresholds did not address all hydrology and water impacts of the project); *Mejia v. City of Los Angeles*

Consequently, despite the lack of a GHG threshold, the District recommends that CEQA environmental documents include a discussion of anticipated GHG emissions during both the construction and operation phases of the project. This recommendation is consistent with comments made by the previous and current California Attorney Generals on Land Use projects undergoing CEQA review. Models are already available to estimate GHG emissions from projects, and the District staff can help agencies select and refine models to accommodate their specific projects.

Analysis of the impacts is not simply a technical exercise. If the analysis demonstrates that a project may have a significant impact, there are many practical climate change mitigation measures available to reduce or eliminate the project impacts. And avoiding feasible mitigation today will require other projects to implement more difficult and costly mitigation in the future as GHG levels increase in the atmosphere. Moreover, many projects include elements that mitigate GHG emissions (energy measures, solar roofs, mixed use housing, etc) and the benefits of these measures should be noted.

The District is available to help agencies in their analysis of GHG emissions. In addition, to aid local jurisdictions in identifying feasible mitigation, the District has attached a list of feasible mitigation measures drawn from comments made by the California Attorney General that will reduce GHG emissions by reducing the stationary and travel related energy use associated with the new development.⁵ A copy of this list is attached to this letter. We have also attached a summary of recent agency and court decisions related to this topic. If you have any question regarding CEQA and climate change, please do not hesitate to contact Larry Robinson at <lrobinson@airquality.org>.

Sincerely,



Larry Greene
Air Pollution Control Officer

Enclosures

(2005 130 Cal.App.4th 322, 342 (agencies can not apply standards or thresholds "in a way that forecloses the consideration of any other substantial evidence showing that there may be a significant effect)).

⁵ California Attorney General. "Comments on Draft Environmental Impact Report for Coyote Valley Specific Plan." Letter to the City of San Jose. 19 Jun. 2007.

Summary of current actions by other agencies and the courts related to Global Warming and Climate Change.

The issue of climate change has gained a great deal of attention recently. Some of the pertinent developments include:

* On September 27, 2006, the State of California adopted AB32, the Global Warming Solutions Act of 2006, which requires the State to reduce its carbon emissions by approximately 25% by the year 2020.

* California Attorney General Bill Lockyer raised the issue of climate change in his comment letter (3/20/06) on the Orange County Transportation Authority's 2006 Long-Range Transportation Plan Draft Program EIR. This precedent-setting letter pointed out that GHG emissions, and their related global warming impacts, are one of the most important environmental impacts associated with vehicle emissions.

* In April 2007, Attorney General Edmund G. Brown sued San Bernardino County for failing to account for the impacts of climate change in the county's recently adopted General Plan. On August 21, 2007, this lawsuit was settled with the adoption of an amendment to San Bernardino County General Plan. This amendment includes a Greenhouse Gas Emissions Reduction Plan that requires the county to establish current and future Green House gas emission baselines and set a target for the reduction of emissions attributable to the county's discretionary land use decisions and its own internal government operations.

* On April 2, 2007 in the case of *Massachusetts v. EPA*, the Supreme Court ruled that the state of Massachusetts and its co-plaintiff's (which included the state of California) had legal standing to sue the Environmental Protection Agency (EPA) for its failure to regulate the emission of GHG by new automobiles. In this same decision, the court rejected the EPA's claim that it lacked authority to regulate CO₂ under the Clean Air Act.

Mitigation Measures and Global Warming Resources

(1) Global Warming Mitigation Measures

The following are some examples of the types mitigation that local agencies may consider under the California Environmental Quality Act (CEQA) to offset or reduce global warming impacts. The list, which is by no means exhaustive or obligatory, includes measures and policies that could be undertaken directly by the local agency, incorporated into the agency's own "Climate Action Plan," or funded by "fair share" mitigation fees; measures that could be incorporated as a condition of approval of an individual project; and measures that may be outside the jurisdiction of the local agency to impose or require but still appropriate for consideration in an agency's environmental document.

While the lead agency must determine which particular mitigation measures, or suite of measures, is appropriate and feasible for a particular project, proponents of individual private projects are encouraged to take an active role in developing and presenting to lead agencies new and innovative ways to address the impacts of global warming.

Transportation

- Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where signals are installed, require the use of Light Emitting Diode (LED) traffic lights.¹
- Set specific limits on idling time for commercial vehicles, including delivery and construction vehicles.
- Require construction vehicles to use retrofit emission control devices, such as diesel oxidation catalysts and diesel particulate filters verified by the California Air Resources Board (CARB).²
- Promote ride sharing programs *e.g.*, by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas.
- Create car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation.³
- Require clean alternative fuels and electric vehicles.
- Develop the necessary infrastructure to encourage the use of alternative fuel vehicles (*e.g.*, electric vehicle charging facilities and conveniently located alternative fueling stations).⁴
- Increase the cost of driving and parking private vehicles by imposing tolls, parking fees, and residential parking permit limits.

- Develop transportation policies that give funding preference to public transit.⁵
- Design a regional transportation center where public transportation of various modes intersects.
- Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations.
- Assess transportation impact fees on new development in order to facilitate and increase public transit service.⁶
- Provide shuttle service to public transit.
- Offer public transit incentives.
- Incorporate bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments.
- Create bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking.⁷
- Require commercial projects to include facilities on-site to encourage employees to bicycle or walk to work.
- Provide public education and publicity about public transportation services.⁸

Energy Efficiency and Renewable Energy

- Require energy efficient design for buildings.⁹ This may include strengthening local building codes for new construction and renovation to require a higher level of energy efficiency.
- Adopt a “Green Building Program” to promote green building standards.¹⁰
- Fund and schedule energy efficiency “tune-ups” of existing buildings by checking, repairing, and readjusting heating, ventilation, air conditioning, lighting, hot water equipment, insulation and weatherization. (Facilitating or funding the improvement of energy efficiency in existing buildings could offset in part the global warming impacts of new development.)
- Provide individualized energy management services for large energy users.
- Require the use of energy efficient appliances and office equipment.¹¹
- Fund incentives and technical assistance for lighting efficiency.¹²
- Require that projects use efficient lighting. (Fluorescent lighting uses approximately 75% less energy than incandescent lighting to deliver the same amount of light.)
- Require measures that reduce the amount of water sent to the sewer system. (Reduction in water volume sent to the sewer system means less water has to be treated and pumped to the end user, thereby saving energy.)¹³
- Incorporate on-site renewable energy production (through, *e.g.*, participation in the California Energy Commission’s New Solar Homes Partnership). Require project proponents to install solar panels, water reuse systems, and/or other systems to capture energy sources that would otherwise be wasted.¹⁴

- Streamline permitting and provide public information to facilitate accelerated construction of solar and wind power.
- Fund incentives to encourage the use of energy efficient equipment and vehicles.¹⁵
- Provide public education and publicity about energy efficiency programs and incentives.

Land Use Measures

- Encourage mixed-use and high-density development to reduce vehicle trips, promote alternatives to vehicle travel and promote efficient delivery of services and goods. (A city or county could promote “smart” development by reducing developer fees or granting property tax credits for qualifying projects.¹⁶)
- Discourage “leapfrog” development. Enact ordinances and programs to limit sprawl.¹⁷
- Incorporate public transit into project design.¹⁸
- Require measures that take advantage of shade, prevailing winds, landscaping and sun screens to reduce energy use.
- Preserve and create open space and parks. Preserve existing trees and require the planting of replacement trees for those removed in construction.
- Impose measures to address the “urban heat island” effect by, *e.g.*, requiring light-colored and reflective roofing materials and paint; light-colored roads and parking lots; shade trees in parking lots; and shade trees on the south and west sides of new or renovated buildings.¹⁹
- Facilitate “brownfield” development. (Brownfields are more likely to be located near existing public transportation and jobs.)
- Require pedestrian-only streets and plazas within developments, and destinations that may be reached conveniently by public transportation, walking, or bicycling.²⁰

Solid Waste Measures

- Require projects to reuse and recycle construction and demolition waste.
- Implement or expand city or county-wide recycling and composting programs for residents and businesses.
- Increase areas served by recycling programs
- Extend the types of recycling services offered (*e.g.*, to include food and green waste recycling).
- Establish methane recovery in local landfills and wastewater treatment plants to generate electricity.²¹
- Provide public education and publicity about recycling services.

(2) General Resources

The following web sites and organizations provide general information about mitigating global warming impacts at the local level. These sites represent only a small fraction of the available resources. Local agencies are encouraged to conduct their own research in order to obtain the most current and relevant materials.

- The U.S. Conference of Mayors' Climate Action Handbook contains valuable information for the many local agencies that are joining the fight against global warming. The Handbook is available at the City of Seattle's Climate Action Plan website: <http://www.cityofseattle.net/climate/docs/ClimateActionHandbook.pdf>.
- Local Governments for Sustainability, a program of International Cities for Local Environmental Initiatives (ICLEI), has initiated a campaign called Cities for Climate Protection (CCP). The membership program is designed to empower local governments worldwide to take action on climate change. Many California cities have joined ICLEI. More information is available at the organization's website: <http://www.iclei.org/>.

(3) Notes

1. For a discussion of the use of LED traffic lights, see the City of Berkeley's Resource Conservation and Global Warming Abatement Plan at <http://www.baaqmd.gov/pln/GlobalWarming/BerkeleyClimateActionPlan.pdf>.
2. See www.arb.ca.gov/diesel/verdev/verdev.htm and www.epa.gov/ispd/pdf/emission_0307.pdf.
3. There are a number of car sharing programs operating in California, including City CarShare <http://www.citycarshare.org/>, Zip Car <http://www.zipcar.com/> and Flexcar <http://www.flexcar.com/>.
4. See the City of Santa Monica's Green Building Program at <http://www.greenbuildings.santa-monica.org/transportation/parkingcharging.html>.
5. San Francisco's "Transit First" Policy is listed in its Climate Action Plan, available at <http://www.sfenvironment.com/aboutus/energy/cap.htm>.
6. San Francisco assesses a Downtown Transportation Impact Fee on new office construction and commercial office space renovation within a designated district. The fee is discussed in the City's Climate Action plan. See Note 5.
7. See Marin County's Safe Routes to Schools program at <http://www.saferoutestoschools.org/>.

8. The U.S. Conference of Mayors' Climate Action Handbook, cited above, lists education and outreach as key components to taking action against global warming.
9. Leadership in Energy and Environmental Design (LEED) administers a Green Building Ratings program that provides benchmarks for the design, construction, and operation of high-performance green buildings. More information about the LEED ratings system is available at <http://www.usgbc.org/DisplayPage.aspx?CategoryID=19>.
10. The City of Santa Monica has instituted a Green Building Program. See <http://www.greenbuildings.santa-monica.org/>.
11. Energy Star is a joint program of the U.S. Environmental Protection Agency and the U.S. Department of Energy that certifies energy efficient products and provides guidelines for energy efficient practices for homes and businesses. More information about Energy Star certified products is available at <http://www.energystar.gov/>.
12. As described in its Climate Action Plan, the City of San Francisco uses a combination of incentives and technical assistance to reduce lighting energy use in small businesses such as grocery stores, small retail outlets, and restaurants. The program offers free energy audits and coordinated lighting retrofit installation. In addition, the City offers residents the opportunity to turn in their incandescent lamps for coupons to buy fluorescent units. See Note 5.
13. The City of Berkeley's Resource Conservation and Global Warming Abatement Plan includes information about strategies for promoting the use of low flush toilets and shower heads. See Note 1.
14. At the direction of Governor Schwarzenegger, the California Public Utilities Commission (CPUC) approved the California Solar Initiative on January 12, 2006. The initiative creates a \$3.3 billion, ten-year program to install solar panels on one million roofs in the State. See <http://www.gosolarcalifornia.ca.gov/nshp/index.html>.
15. In March 2007, the League of California Cities (LOCC) Climate Change Working Group drafted proposed Climate Change Policies and Guiding Principles for the League. The draft principles (March 30, 2007) can be found on the LOCC website at http://www.cacities.org/resource_files/25656.EQ%20high3-07%20REVISED.pdf
16. The City of Berkeley has endorsed this strategy in its Resource Conservation and Global Warming Abatement Plan. See Note 1.
17. Samples of local legislation to reduce sprawl are set forth in the U.S. Conference of Mayors' Climate Action Handbook, cited above.

18. The U.S. Conference of Mayors cites Sacramento's Transit Village Redevelopment as a model of transit-oriented development. More information about this project is available at <http://www.cityofsacramento.org/planning/projects/65th-street-village/>.
19. See Lawrence Berkeley National Laboratory's "Cool Roofing Materials Database" prepared by the Laboratory's Heat Island Project at <http://eetd.lbl.gov/coolroof/> and U.S. EPA's Heat Island site at www.epa.gov/heatisland/.
20. Palo Alto's Green Ribbon Task Force Report on Climate Protection recommends pedestrian streets under its proposed actions. See <http://www.city.palo-alto.ca.us/greenribbon/index.html>.
21. San Diego's Metropolitan Wastewater Department installed eight "digesters" at one of its wastewater treatment plants. Digesters use heat and bacteria to break down the organic solids removed from the wastewater to create methane. See <http://www.sandiego.gov/mwwd/facilities/ptloma.shtml>.



September 12, 2007

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

Dear Ms Kiriu:

With this letter, the Cosumnes Community Services District (CSD) Fire Department respectfully submits its initial comments with regard to the proposed Galt General Plan and its related Environmental Impact Report. As you know, the Cosumnes CSD Fire Department, through its Galt Division, is the sole provider of fire protection and emergency medical services to citizens living within the City of Galt, as part of its 157-square mile service area.

Our comments include suggested changes to the policies included in the Public Facilities and Services, Safety and Seismic, and Circulation and Transportation Elements of the proposed General Plan update. We also are including our initial comments on the public services impacts that should be analyzed and mitigated in the Environmental Impact Report prepared in connection with the update of the Galt General Plan. It is our intent to actively participate in the General Plan and environmental process and provide additional comments as the City goes forward.

The Cosumnes CSD Fire Department has determined that the City of Galt's General Plan update, when combined with other recent actions by the City of Galt, would constitute a significant impact upon the public safety of the citizens of Galt, and is of such grave concern that the Fire Department believes it merits immediate consideration.

This determination stems from a variety of factors, but is based on two major ones. The General Plan envisions significant population growth for the City of Galt. This growth necessarily will require new and expanded fire stations, along with an increase in emergency personnel, to assure that Galt residents receive the same high level of fire protection and emergency medical care afforded other residents of the region. At the same time, however, the City of Galt's recent action with regard to its Redevelopment Agency would so significantly impact the Cosumnes CSD Fire Department's Galt Division as to make providing this level of service impossible.

Specifically, the new Redevelopment Agency extension and expansion actions would divert approximately \$22 million, and potentially much more, in property tax revenue

away from the Fire Department over the life of the new General Plan. Over the much longer life of the Redevelopment Agency's authority to collect property tax revenue, the loss is estimated to be approximately \$38 million and, again, potentially much more. This would occur at a time when anticipated growth would necessitate construction of two additional fire stations in Galt, expansion of another, and hiring of approximately 50 additional firefighters and paramedics. A loss in revenue of this magnitude would not only make this impossible, but would require the Fire Department to actually begin to reduce service levels in Galt.

The result would be an expanding City, and a decreasing level of fire protection and emergency medical care. Public safety simply must be of primary consideration as we move forward together in this process. It is therefore critical that the City of Galt provides the Cosumnes CSD Fire Department its plans for securing necessary funding to meet these emergency service requirements.

Our enclosed comments outline, in some detail, the types and levels of fire protection and emergency medical services that are appropriate for the citizens of Galt.

Please contact us at your earliest convenience so we might discuss this issue in more detail. Please provide copies of all future official notices, correspondence, and other communications concerning the General Plan update and the EIR for the General Plan update to Steven J. Foster, Fire Chief, and me, with copies to our attorney in this matter, Harriet A. Steiner.

Sincerely,



Donna L. Hansen
General Manager

enclosures (2)

cc: Tim Raboy, Mayor, City of Galt
Andrew Meredith, Vice Mayor, City of Galt
Darryl Clare, Councilperson, City of Galt
Donald Haines, Councilperson, City of Galt
Barbara Payne, Councilperson, City of Galt
Steven J. Foster, Cosumnes CSD Fire Department
Gil Albiani, President, Cosumnes CSD Board of Directors
Gerald Derr, Vice President, Cosumnes CSD Board of Directors
Elaine Wright, Director, Cosumnes CSD Board of Directors
Keith Grueneberg, Director, Cosumnes CSD Board of Directors
Douglas McElroy, Director, Cosumnes CSD Board of Directors
Harriet A. Steiner, Attorney, McDonough Holland & Allen PC

ENCLOSURE 1

COSUMNES CSD FIRE DEPARTMENT POLICY COMMENTS FOR THE CITY OF GALT GENERAL PLAN 2030

The Cosumnes Community Services District (CSD) submits the following comments in response to the Galt General Plan Notice of Preparation. The CSD provides fire prevention, fire protection and emergency medical services to residents of the Galt area. The comments are formatted consistent with the August 14, 2007 City of Galt General Plan Notice of Preparation, specifically the Public Facilities and Services Element and Safety and Seismic Element. The Notice of Preparation indicates that population build-out estimates range from 50,950 in Alternative 2-Compact Growth to 73,000 for Alternative 3-Expanded Study Area.

The environmental review should analyze the ability of the City, through implementation of the proposed General Plan and the recent redevelopment plan action to meet the response times and service levels currently established by the Cosumnes CSD, as set forth in part below. Policies and mitigation measures should be developed and adopted to assure that the Galt community has adequate fire, medical and other emergency facilities and services. To the extent that the provision of facilities and services rests on the availability of funding, the EIR should address the potential adverse impacts of funding levels and availability on fire, medical and other emergency response, including disaster response, and mitigation measures, as necessary to address the adverse impacts of constraints on funding. The CSD would like to work with the City to assure that the General Plan EIR adequately addresses and mitigates all fire and emergency response issues, including both facilities and equipment and operations. Further, the CSD has suggested modifications to proposed General Plan polices related to fire protection, medical and other emergency response issues. The CSD is willing to work with the City to draft language that will appropriately address the fire, medical and emergency response issues in the General Plan. To that end, the CSD may suggest additional polices or amendments to policies as this process moves forward.

Existing Service Levels

The response time policy of the Cosumnes CSD Fire Department states “It shall be the goal of emergency response units from the Cosumnes CSD Fire Department to arrive on-scene in urban areas of the CSD within five minutes of initial dispatch, 80 percent of the time. In rural areas of the CSD emergency response units shall arrive on-scene within seven minutes of initial dispatch, 80 percent of the time.” The Cosumnes CSD Fire Department uses a staffing model comparable to most other Sacramento Regional fire service agencies to achieve this goal. This model utilizes 3-person staffing for all engine companies, 4-person staffing for all truck or rescue companies, and 2-person staffing for all medic ambulances. Utilizing a three platoon system, services are provided to the residents of the City of Galt 24 hours a day, 7 days a week, 365 days a year. Consistent

service levels apply across the CSD service area so that all residents served by the Cosumnes CSD Fire Department enjoy the same excellent level of service.

Service and Facilities for New Growth Areas

All new growth fire stations will be designed to be environmentally friendly and will use green energy design. These stations will be designed with at least three garage bays and will be deep enough to store two Type I engines in each garage. The facilities will make use of all the latest technologies to allow for efficient and expedient response. Community rooms will be co-located within the fire stations. All new growth fire stations shall be located such that their distribution and location allows for compliance with the Department's Response Time Policy.

City Street Standards should assure that street width and design accommodate the safe travel of heavy emergency vehicles. Based on the design of the roadway infrastructure, that neighborhoods with linear street designs should have a planning model to accommodate fire stations with response area travel distances no more than 1.25 miles. If curvilinear street designs are utilized the travel distance should be reduced to no more than 1.125 miles.

Build out of new growth fire stations should be commenced after evaluating growth and service trends, and be conducted in a timely manner that is consistent with the Department's Response Time Policy.

Agency Emergency Response

The CSD will be prepared to protect the safety and welfare of community members, staff and participants during disaster situations. In addition, the CSD attempts to mitigate the effects of disasters through the use of emergency preparedness procedures, extensive training of employees and community members through programs such as Community Emergency Response Team (CERT) and through access to emergency supplies. The EIR should address potential disaster situations and include an analysis of potential adverse impacts and methods to mitigate these impacts.

Comments to the Public Facilities and Services Element

Public Facilities and Services Funding

Goal PFS-1

To ensure the timely development of public facilities and services, the maintenance of specified service levels for public facilities, and that adopted facility and service standards are achieved and maintained through the use of equitable funding methods.
(M&A)

Policy PFS-1.1 General Financing

The City should continue to provide for the location and development of needed public buildings and facilities. (City: 1-17)

Recommended Language:

The City should continue to provide for the location and development of needed public buildings and facilities. The City will work with the Cosumnes Community Services District to fund necessary public fire facilities, equipment and operational costs for the provision of fire prevention, fire protection and emergency medical services to Galt residents.

Policy PFS-1.9 Fair Share Costs on New Developments

The City shall require that new development pay its fair share of the cost of providing new public services and/or the costs of upgrading all existing facilities it uses based on the demand for these facilities attributable to the new development. (M&A)

Recommended Language:

The City shall require new development pay its fair-share cost of providing new public services and/or the costs of expanding or upgrading existing facilities and services impacted that is attributable to new development.

Water Supply, Treatment, and Delivery

Goal PFS-2

To ensure an adequate, safe, and reliable water supply sufficient to meet the future needs of the city. (M&A)

Policy PFS-2.11: Fire Protection

The City shall ensure adequate water pressure throughout the urban area for fire protection purposes. (M&A)

Recommended Language:

The City shall ensure adequate water pressure throughout the urban area for fire protection purposes. City improvement standards shall require that new development install necessary fire hydrants at each 300 foot interval in commercial areas and 500 foot intervals in residential areas. Associated water supply systems shall be installed and operational at the same time street improvements are made. Minimum water fire flows shall be 3,000 gallons per minute (gpm) at 20 pounds per square inch (psi) in commercial development areas and 1,500 gpm at 20 psi in residential development areas.

Fire Protection and Emergency Medical Services

Goal PFS-7

To protect residents, employees, and visitors in Galt from injury and loss of life and to protect property from fires. (M&A)

Policy PFS-7.1: Fire Protection

The City should continue to support the Cosumnes Community Services District Fire Department for fire protection service capable of meeting the needs of the community based on the benefit received to the city. (City: 1-15)

Recommended Language:

The City will collaborate with and support the Cosumnes Community Services District Fire Department to protect against the loss of life and property as it provides fire prevention, fire protection and emergency medical services to the residents of the City of Galt using highly trained personnel.

Policy PFS-7.2: Fire Code

The City shall comply with the provisions of the California Fire Code. (M&A and City Staff)

Recommended Language:

The City shall comply with the provisions of the California Fire Code with City of Galt Amendments.

Policy PFS-7.3: Fire Protection Facilities

The City shall require new development to develop or fund fire protection services, facilities, and personnel based on benefit received to the City. (M&A)

Recommended Language:

The City shall require new development to mitigate the impact of development on fire protection and fire prevention services either through the construction of facilities or payment of mitigation fees to resolve facility and service impacts resulting from development.

Policy PFS-7.4: Emergency Medical Services

The City should continue to support the Cosumnes Community Services District Fire Department for emergency medical services capable of meeting the needs of the community based on the benefit received to the city. (City: 1-15)

Recommended Language:

The City will support the Cosumnes Community Services District Fire Department as it provides a comprehensive emergency medical services program of Advance Life Support services and reliable ambulance transport services to aid citizens in need of rescue or medical assistance.

Recommended Additional New Policy

Policy PFS-7.5: Emergency Medical Services and New Development

The City shall require new development to mitigate the impact of development on emergency medical services either through the construction of facilities or payment of mitigation fees to resolve facility and service impacts resulting from development.

Public Facilities and Services Element Implementation Programs

PFS-J: New Fire Substations

The City shall develop new fire substations, as necessary, in the locations shown on the Land Use Diagram. (M&A)

Recommended Language:

The City shall work with the Cosumnes Community Services District to identify and site new fire stations that will best serve the residents of Galt including existing and new growth areas in order to meet the Fire Department's Response Time Policy.

Comments on the Safety and Seismic Element

General Health and Safety

Goal SS-1

To protect the community from injury and damage resulting from natural catastrophes and hazardous conditions. (M&A)

Recommended Additional New Policy SS-1.7

Recommended Language:

The City should also coordinate the design and installation of traffic control and traffic calming measures to minimize impacts on emergency vehicle responses. Traffic signals shall be equipped with electronics to permit emergency vehicles to override the traffic signals to expedite emergency response.

Fire Hazards

Goal SS-4

To minimize the risk of loss of life, injury, distress, and damage to property resulting from natural and human-made fires. (M&A)

Policy SS-4.1: Building Inspections

The City should assist, if necessary, the Cosumnes Community Services District Fire Department to correct any potential fire hazards identified during inspections of existing buildings. (City: B-12)

Recommended Language:

The City should assist, if necessary, the Cosumnes Community Services District Fire Department in the correction of potential fire hazards identified during inspections of existing and newly constructed buildings.

Policy SS-4.3: Variance Approval for Fire Vehicle Access

The City should not grant variances for width of public street frontage unless the applicant for such variances demonstrates that ample access for fire vehicles is available. (City: B-16)

Recommended Language

The City should not grant variances for width of public street frontage unless the applicant for such variances demonstrates that ample access for fire vehicles is available. The City will require development that includes private access roads or fire roads to provide access rights and meet the minimum requirements of the amended Fire Code.

Policy SS-4.4: Water Supply for New Developments

The City should approve developments only if sufficient water supply and access are available, at the time combustible materials are brought on the construction site, and will be available upon completion of the project to effectively fight fires in the development.

(City: B-16)

Recommended Language:

The City should approve development only if sufficient water supply and emergency vehicle access are available at the time combustible materials are brought on the construction site, and will be available upon completion of the project to effectively fight fires in the development during and after construction.

Policy SS-4.5: Fire Fighting Resources in Development Plans

The City should encourage all development projects to mitigate fire protection impacts associated with capital facilities and equipment, including personnel. (City: B-17 and City Staff)

Recommended Language:

The City shall require all development projects to mitigate impacts to fire protection, fire prevention and emergency medical services through the payment of mitigation fees, construction of facilities and the analysis and identification of adequate funding of operational impacts that will result from the new development including personnel.

Policy SS-4.6: Fire Sprinklers

The City should encourage sprinkler systems in all new commercial, office, public, and industrial construction exceeding 5,000 square feet cumulative area in a single development. (City: B-18)

Recommended Language:

The City shall require sprinkler systems in all new commercial, office, public, and industrial construction exceeding 3,600 square feet cumulative area in a single development. In addition, the City should continue to encourage fire sprinklers in all new residences.

Comments to the Circulation Element

City Street System

Goal C-1

To provide for the long range planning and development of the City's street system to ensure the safe and efficient movement of people and goods. (M&A)

Policy C-1.11: Union Pacific Railroad Crossing

The City should develop a separated grade crossing at the Union Pacific mainline railroad to serve the west side of the city. (City Staff)

Recommended Language:

The City of Galt should provide an over-crossing / under-crossing over the Union Pacific railroad tracks to provide for adequate response times for public safety and to mitigate the blocking of the tracks by trains. A minimum of one crossing near the center of the City is appropriate.

The CSD strongly recommends consideration of a railroad track over or under-crossing that can accommodate emergency vehicles. With increased call volumes and the expansion of the urban area, we anticipate that crossing the railroad tracks may become an increasing significant emergency response constraint that will adversely impact response times. Citizen complaints have already surfaced regarding this matter. As you are aware, response time is critical to both fire and medical emergency response and lives can be saved with faster response times. Therefore, we believe that the City must consider, analyze and approve an over or under-crossing of the railroad tracks that cannot be impeded by trains.

ENCLOSURE 2

**COSUMNES CSD FIRE DEPARTMENT
SCOPING COMMENTS
FOR THE
ENVIRONMENTAL IMPACT REPORT (EIR)
OF THE CITY OF GALT
GENERAL PLAN 2030**



**COMMENTS RELATIVE TO THE PUBLIC SAFETY
ELEMENT OF THE EIR**

STAFFING

- The Galt Division is currently staffed with 33 full-time personnel.
- If amendments currently underway stimulate growth that is higher than anticipated, the Cosumnes CSD Fire Department plans to adjust staffing accordingly to meet the service demands and the requirements for firefighter safety and public safety.
- Based on population, geography, and service demands, the Cosumnes CSD Fire Department expects that by the year 2030, staffing will be increased to 83 full-time members.

CURRENT AND RECOMMENDED SERVICE LEVELS

- Currently, the Cosumnes CSD Fire Department is using a staffing model comparable to the Sacramento Regional Fire Services Emergency Agencies. This model utilizes 3-person staffing for all Engine companies, 4-person staffing for all Truck and/or Rescue companies, and 2-person staffing for all medic ambulances.

- The Galt Division of the Cosumnes CSD Fire Department covers approximately 56 square miles, with approximately 10% of this area lying within the current city limits of Galt. The intended changes to the City of Galt General Plan will increase the need for fire, rescue, and emergency services.
- The Galt Redevelopment Agency 2007 Plan has prevented the addition of a fourth firefighter on Engine 45 and is responsible for our inability to staff Station 47 in the near future. This is due to the redirecting of approximately \$38,000,000 of property tax revenue that would have otherwise been used to maintain the Galt Division over the course of the updated General Plan.

RESPONSE AND PROTECTION

- In order to meet the service demands of the City of Galt's General Plan in the year 2030, the Cosumnes CSD Fire Department will need to renovate existing Station 45, expand existing Station 46, and construct two (2) new growth fire stations – Station 47 and Station 48.
- These stations must be located to meet or exceed the response time goals of the District. During the planning phases of new developments, attention must be given to street width and design to accommodate the safe travel of heavy emergency vehicles. It is further recommended, based on the design of the roadway infrastructure, that neighborhoods with linear street designs have a planning model to accommodate fire stations with travel distances no further than 1.25 miles. If curvilinear street designs are utilized the travel distance should be reduced to no more than 1.125 miles.
- The City of Galt should provide an over-crossing / under-crossing over the Union Pacific railroad tracks to provide for adequate response times for public safety and to mitigate the blocking of the tracks by trains. A minimum of one crossing near the center of the City is appropriate.
- In addition to the new growth fire station facilities, the Fire Department will need to add apparatus and equipment. To meet the anticipated service demands, the Fire Department anticipates the need to purchase apparatus and equipment, and increase staffing as detailed in Table 6.5.

| TABLE 6.5 | | | |
|---|--------------------|----------------------------|-----------------|
| GALT DIVISION – COSUMNES CSD FIRE DEPARTMENT | | | |
| EQUIPMENT AND STAFFING PLAN | | | |
| STATION | APPARATUS | EQUIPMENT | STAFFING |
| Station 45 | Rescue Engine 45 | 4.9 GHz Radio System | 3 personnel |
| | | | |
| Station 46 | None | 4.9 GHz Radio System | None |
| | | Emergency Response Signals | |
| | | | |
| Station 47 | Type I Engine | 4.9 GHz Radio System | 15 personnel |
| | Type III Engine | Emergency Response Signals | |
| | Medic Ambulance | Defibrillators | |
| | Air Unit | | |
| | | | |
| Station 48 | Type I Engine | 4.9 GHz Radio System | 30 personnel |
| | Type III Engine | Emergency Response Signals | |
| | Medic Ambulance | Defibrillators | |
| | Truck | | |
| | Heavy Rescue | | |
| | | | |
| Admin | Two staff vehicles | None | 2 personnel |

- This will increase staffing in the Galt Division by 50, to a total of 83 full-time employees.
- New Growth Fire Stations – All new growth fire stations will be designed to be environmentally friendly and will use green energy. These stations will be designed with at least three (3) garage bays and will be deep enough to store two (2) Type I engines in each bay. The facilities will make use of all the latest technologies to allow for the expedient response of emergency works. Community rooms will be co-located within the fire station facilities.
- Remote Emergency Services Training Facility – There is a need for the Cosumnes Fire Department to provide its employees with a safe and secure area to practice fire ground skills. At this time, the Cosumnes Fire Department believes the use of old Station 44 would be the most effective use of taxpayer resources.

The Cosumnes CSD Fire Department estimates that by the year 2030, there will be 73,000 people living and/or working within the jurisdiction. If this growth rate is maintained, the development of Fire District infrastructure will continue to develop at a steady rate. If the population estimate is low, capital infrastructure support will be necessary.

The existing Fire Department facilities will need improvement. The current use and recommendations for these facilities are:

- Station 44 – 205 Guild Street. Previously used as a fire station, this facility has been converted to a temporary facility to provide storage for reserve apparatus.

Recommendation: This facility will be converted to a remote training facility and include a classroom and drill grounds.

- Station 45 – 215 - 5th Street. This station currently houses five firefighters and one Battalion Chief. There is a severe shortage of storage area, dormitory area, exercise area, etc.

Recommendation: Station 45 will need to undergo a facility assessment to determine how best to remodel the facility to provide the optimum customer service capability as well as efficiency within the emergency response model. This will include environmental, space, and storage needs assessments.

- Station 46 - 1050 Walnut Avenue. When Station 46 was originally built, it provided an acceptable level of service to the community. The community has grown since its completion and now the facility is significantly undersized for its service demands. The station currently has five firefighters and three emergency vehicles (Engine 46, Medic 46, and Grass 46). Because the station has only two indoor garage bays, one piece of apparatus must be parked outside year-round.

Recommendation: The station will need to double in size. The crew's quarters must be expanded to accommodate a minimum of seven (7) firefighters, although room for eight (8) firefighters is optimum. In addition, the apparatus room will need to be enlarged to provide indoor storage for all front line emergency equipment as well as a reserve ambulance.

- The Cosumnes Fire Department realizes the Master Plan for the City of Galt may stimulate development in the Galt area and require additional growth fire stations and support facilities.

FUNDING, REVENUES, ALLOCATIONS

- The Cosumnes CSD Fire Department has begun a nexus study to determine the comparable funding to meet the current and future needs of the District and its population. All sources of revenue income will be assessed. It is the intention of the Cosumnes CSD Fire Department to develop and reorganize fee assessment district-wide instead of incremental planning zones. The goal of these fee structures, both current and undeveloped, is to provide the revenue to meet the current and anticipated funding needs.

- The Cosumnes CSD Fire Department is also developing facility, apparatus, and equipment replacement plans to better forecast the needs for capital expenditures and determine when these budget items are likely to impact the jurisdiction.
- The City shall require new development pay its fair-share cost of providing new public services and/or the costs of expanding or upgrading existing facilities and services impacted that is attributable to new development.

ADMINISTRATION AND PLANNING

- The Cosumnes CSD Fire Department has begun to focus on the use of technology to increase efficiency and effectiveness in its operations and customer service. The District will continue to pursue technology including video conferencing, 4.9 GHz microwave communications systems, and the rejuvenation of the Sacramento Regional Fire and Emergency Communications Center.
- Other technologies that will be maintained include the Cosumnes CSD Fire Department Intranet, Station Alerting systems, Digital Mapping systems, and the use of Mobile Data Computers (MDCs). MDCs are computers mounted in an emergency vehicle and provide responders with up-to-the-minute information for use in the response, control, and mitigation of man-made and natural disasters.
- ***The three stations shown on the City Council Preferred Land Use Alternative 3/14/07 map are out of position. Our analysis indicates that only two real growth stations are needed and location is shown on the attached Proposed Fire Station Location and Coverage Extents map.***



CARLTON
Engineering Inc.

September 11, 2007

Sandra Kiriu, Principal Planner
County of Galt Planning Department
495 Industrial Drive
Galt, CA 94532

And VIA FACSIMILE (209) 744-1642

And VIA e-mail at skiriu@ci.galt.ca.us

Re: Response to Notice of Preparation for Galt General Plan Update

Dear Ms. Kiriu:

In response to the Notice of Preparation, on behalf of Jerry Regan who has interest in the following properties

1220 Amador Avenue (APN # 150-0042-026), 13.17 acres
10627 Simmerhorn Road (APN # 150-0042-024), 23 acres
10657 Simmerhorn Road (APN #150-0042-025), 20.4 acres

we offer the following comments:

1. There is a direct link between the proposed land use designation of the above-referenced properties and the policies to be considered within the General Plan document. The proposed land use designation would call for high-density residential development along Simmerhorn Road, with the majority of the land behind the housing being devoted to industrial uses. Of the proposed General Plan policies that have been distributed to date, it is my opinion that there are inconsistencies between the proposed land use designations and the proposed written policies. This would make it difficult to prepare an environmental document where there are such discrepancies. Therefore, the

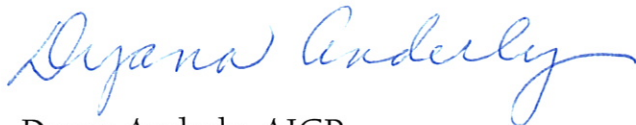
preparation of the environmental document should be held off until these inconsistencies are resolved.

2. For the above-referenced properties, the environmental document should consider a mixed-use commercial/residential land use as this land use designation would be in keeping with the proposed General Plan policies. Please note,
 - a. Two of the three Simmerhorn properties abut residentially zoned land. One of the proposed policies of the General Plan states, “*Enhance the character and integrity of existing residential neighborhoods and protect these neighborhoods from incompatible uses.*” Assigning a land use designation on the majority of the properties with “industrial” is inconsistent with this policy. Furthermore, the proposed land use designation would require industrial-type traffic to pass through a proposed high-density residential development, which is also inconsistent with this policy.
 - b. A neighboring subdivision was designed to eventually connect to the Simmerhorn properties, further substantiating why the back portion of the Simmerhorn properties should have a General Plan land use designation of residential or mixed use and not “Industrial.”
 - c. One of the proposed General Plan policies speaks to the importance of making Galt’s major gateways attractive, and the Simmerhorn properties should be included in this strategy given their proximity to a major access point to Galt. Attaching an industrial land use designation to the properties would be inconsistent with this policy. The industrial zoning district allows such land uses as open storage and warehousing, which is inconsistent with this policy.
 - d. One of the proposed policies of the General Plan supports “regional commercial” activities along the Highway 99 freeway frontage. The Simmerhorn properties should be included in this strategy given their proximity to Highway 99. The Simmerhorn properties are conducive to regional commercial development considering their cumulative size and proximity to Highway 99. This is also true for the property between the Simmerhorn properties and Highway 99.
 - e. A proposed policy promotes “mixed use” development, and the policy refers to Twin Cities and Galt’s downtown for this purpose. The

Simmerhorn properties should be specifically referred to as it may be advantageous to develop the Simmerhorn properties with a mix of uses, such as commercial along Simmerhorn and residential in the rear.

Please take into consideration the above recommended land use designation of mixed use (commercial/residential) for the above-referenced properties in the environmental document.

Sincerely,



Dyana Anderly, AICP
Director of Planning

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE

VENTURE OAKS, MS 15

P. O. BOX 942874

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September 13, 2007

07SAC0148

03-SAC- VARIOUS

City of Galt General Plan Update

Notice of Preparation

SCH#2007082092

Ms. Sandra Kiriu

City of Galt Planning Department

495 Industrial Drive

Galt, CA 95632

Dear Ms. Kiriu:

Thank you for the opportunity to review and comment on the proposed City of Galt General Plan Update's (GPU) Notice of Preparation (NOP). Our comments on the NOP document and what Caltrans would like to see included in the Draft Environmental Impact Review (DEIR) document are as follows:

- A Traffic Impact Study (TIS) should be completed as part of the Circulation Element and include an analysis of impacts to the State Highway System. The TIS should include State Route (SR) 99 and SR 104 and a discussion of their ultimate widened capacity both within Galt and areas outside of Galt that would be significantly impacted by build-out of the General Plan. The TIS should consider all possible traffic impacts to all ramps, ramp intersections, and mainline segments. The "Guide for Preparation of Traffic Impact Studies" can be found on our website at: <http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/>. We would be pleased to meet with the City to discuss scoping issues related to the State Highway System and would appreciate the opportunity to review the draft scope of the TIS before the Study begins.

- Please provide the following in the TIS:
 - Existing Conditions: current year traffic volumes and peak-hour Level of Service (LOS) analysis of the effected State highway facilities.
 - Proposed Project Only With Select Link Analysis: Trip generation and assignment for build-out of general plans.
 - General Plan Build-out Only: Trip assignment and peak hour LOS analysis. Include current land uses and other pending general plan amendments.
 - General Plan Build-out Plus Proposed Project: Trip assignment and peak hour LOS analysis. Include proposed project and other pending general plan amendments.

- Mitigation measures should be identified where the project would have significant impacts. Caltrans considers the following to be significant impacts:
 - Off-ramps with vehicle queues that extend into the ramp's deceleration area or onto the freeway.
 - Vehicle queues at intersections that exceed existing lane storage.
 - Project traffic impacts that cause any ramp's merge/diverge LOS to be worse than the freeway's LOS.
 - Project impacts that cause the freeway or intersection LOS to deteriorate beyond LOS "E" for freeway and LOS "D" for highway and intersections. If LOS is already "E" or "F", then a quantitative measure of increased queue lengths and delay should be used to determine appropriate mitigation measures.

- Where the TIS identifies significant impacts, please coordinate with Caltrans to identify feasible mitigation measures. Potential mitigation measures could include ramp widening, ramp intersection improvements, signalization modification, auxiliary lanes, mainline improvements, proportional share funding mechanisms, and off-highway projects such as transit or local roads that reduce or fully mitigate the respective impact.

- Caltrans has begun developing Corridor System Management Plans (CSMPs) for major transportation corridors throughout the State. CSMPs provide for the integrated management of travel modes and roadways so as to facilitate the efficient and effective mobility of people and goods within our most congested transportation corridors. Each CSMP presents an analysis of existing and future traffic conditions and proposes traffic management strategies and capital improvements to maintain and enhance mobility within each corridor. The corridor management planning strategy is based on the integration of system planning and system management. Each CSMP will address State Highways, local parallel roadways, regional transit services, and other modes pertinent to corridor mobility.

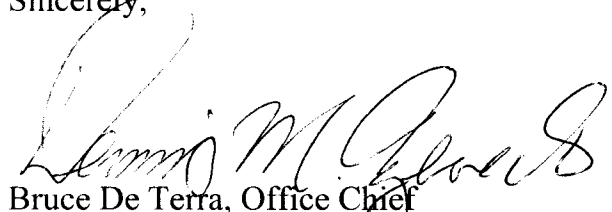
Each CSMP is developed in concert with, and in consideration of, State, local and regional goals, including, but not limited to, local and regional mobility, transportation system connectivity, regional blueprint planning, context sensitive transportation solutions, and encouraging the use of alternative transportation modes to the single occupant vehicle. The CSMPs function in an extremely dynamic environment within which growth is inevitable. However, the CSMPs provide the mechanism through which the State and its local partners can accommodate this growth and still realize their unique and shared goals and objectives.

A CSMP is currently being developed for SR 99/Interstate 5 in South Sacramento County. The study boundary for this CSMP is currently just north of Galt, but Galt obviously has an interest in mobility throughout the corridor and we would appreciate your participation. We are coordinating with local agencies and other stakeholders and have begun meeting with agency representatives on this matter. Caltrans hopes that the City of Galt would commit to the coordinated development and implementation of CSMPs in the 99 Corridor.

- Caltrans supports and encourages local governments to adopt and implement smart growth concepts. We suggest that the City of Galt consider adding additional smart growth policies and programs into the General Plan. For sustainability, community size should be designed so that housing, jobs, daily needs and other activities are within easy walking/biking distance of each other. The design and circulation network for the area should be planned to encourage and facilitate the use of alternative transportation modes, including bicycles, transit, and pedestrian travel. Other concepts might include
 - Establishing land use strategies to increase population and housing densities and make public transportation more viable. These strategies help to reduce sprawl, and conserve valuable farmland and open space.
 - Placing a priority on infill development so as to make most efficient use of existing resources and avoid the negative consequences of suburban sprawl.
 - Placing housing closer to employment centers so as to promote a jobs/housing balance. This placement will decrease overall vehicle miles of travel resulting in less traffic congestion.
 - Managing and operating existing highway, transit, and other transportation modes to maintain or improve performance without adversely affecting neighborhoods.
 - Supporting mixed-use development so that transit, bicycle, and pedestrian facilities are viable options to driving.

A future meeting should be held to exchange information and perspectives regarding the General Plan Update in early consultation. Please provide our office with a copy of the DEIR, addressing the above issues, and any further action regarding this project. If you have any questions regarding these comments or to set up the future meeting, please contact Ken Champion at (916) 274-0615.

Sincerely,



Bruce De Terra, Office Chief
Office of Transportation Planning – South

c: Scott Morgan, State Clearinghouse



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Committee Chairperson*

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*Enrollment Committee
Chairperson*

October 23, 2007

Sandra Kiriu,AICP
City of Galt Planning Department
495 Industrial Drive
Galt, Ca 95632



RE: Notice of Preparation of an environmental impact report for the Galt General Plan update:2030

Dear Sandra Kiriu,AICP

Our Heritage Cultural Committee has reviewed your letter, and our research has determined that the proposed project site mentioned may possibly be within our Tribes Ancestral Territory.

The proposed project could be subject to Section 106 of the National Preservation Act (NHPA), and/or Native American Graves Protection and Repatriation Act (NAGPRA). Please keep the Tribe informed on this current project listed above.

Keep us informed our meeting are 2nd Tuesday and last Tuesday of every month.

Thank you for notifying the tribe and if you should have further questions, please do not hesitate to contact me at billie@ionemiwok.org.

Sincerely,

Billie Blue Elliston
Heritage Cultural Committee Chair

CC:
Matthew Franklin
Chairperson

S:\ADMINIS\COMMITTEES\Heritage Cultural Committee\HC YES Response Letter.doc

