

*FINAL*

**ENVIRONMENTAL IMPACT REPORT  
FOR THE CITY OF GALT  
SPHERE OF INFLUENCE AMENDMENT**



**SACRAMENTO LOCAL AGENCY  
FORMATION COMMISSION**

Prepared with the Technical Assistance of  
Planning Partners

October 2010





*FINAL*

**ENVIRONMENTAL IMPACT REPORT  
FOR THE CITY OF GALT  
SPHERE OF INFLUENCE AMENDMENT**

---

**SACRAMENTO LOCAL AGENCY FORMATION COMMISSION**

1112 I Street, Suite 100  
Sacramento, CA 95814

Prepared with the Technical Assistance of:



P.O. Box 627  
7281 Lone Pine Drive, Suite D-203  
Sloughhouse, CA 95683

October 2010



## TABLE OF CONTENTS

---

| Chapter |  | Page |
|---------|--|------|
| 1.0     | Introduction .....                                 | 1-1  |
| 1.1     | CEQA Process .....                                 | 1-1  |
| 1.2     | Purpose of this Environmental Impact Report .....  | 1-2  |
| 1.3     | Type of Environmental Impact Report .....          | 1-2  |
| 1.4     | Project Summary.....                               | 1-3  |
| 1.5     | Mitigation and Reporting Program and Findings..... | 1-3  |
| 2.0     | Public Comment and Response to Comments.....       | 2-1  |
| 2.1     | Public Comments and Responses.....                 | 2-1  |

This page intentionally  
left blank.

## 1.1 CEQA PROCESS

In preparing an Environmental Impact Report (EIR), the California Environmental Quality Act (CEQA) requires public agencies to circulate a Draft EIR (DEIR) for public and agency review and comment. The public agency then uses the comments obtained by this review to modify or correct the EIR for subsequent use in project review and consideration. The document containing the text of any comments received on the DEIR, responses of the lead agency to these comments, and any corrections or amendments to the EIR is termed the Final EIR (FEIR).

The DEIR for the City of Galt Sphere of Influence (SOI) Amendment project was circulated locally and with the State Clearinghouse (SCH# 2010072039) from July 14, 2010, to August 30, 2010. The Sacramento Local Agency Formation Commission (LAFCo), lead agency for the project, accepted written comments on the DEIR during this period. A notice of availability was posted on the Sacramento LAFCo website (<<http://www.saclafco.org>>) and published in the Galt Herald newspaper on July 14, 2010. Additionally, a noticed public meeting was held by the Sacramento LAFCo during a regular Commission meeting on August 4, 2010 to take public input and review, and consider the Draft EIR. This FEIR has been prepared to respond to the comments received on the DEIR for the City of Galt SOI Amendment project.

Consistent with the requirements of §15132 of the State CEQA Guidelines<sup>1</sup>, this FEIR consists of:

- The DEIR (composed of the Draft Environmental Impact Report for the 2030 Galt General Plan, Final Environmental Impact Report for the 2030 Galt General Plan, and the Environmental Checklist Evaluating the Suitability of the Galt General Plan Update: 2030 Environmental Impact Report to Assess the City of Galt SOI Amendment Project, in addition to any and all appendices) published on July 14, 2010 (incorporated by reference);
- A list of persons, organizations, and public agencies commenting on the DEIR;
- Comments received on the DEIR;
- The response of the Sacramento LAFCo to significant environmental issues raised in the review and consultation process.

This “response to comments” document, together with the DEIR for the City of Galt SOI Amendment project, constitutes the FEIR for the project. This document incorporates comments received on the DEIR, as well as responses by the lead agency (Sacramento LAFCo) to these comments. Based on the comments received, no modification of the EIR would be necessary. The FEIR is an informational document that must be considered and certified by the lead agency prior to considering approval of the City of Galt SOI Amendment project.

---

<sup>1</sup> Title 14, California Code of Regulations, Chapter 3, Guidelines for Implementation of the California Environmental Quality Act.

## 1.2 PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

CEQA requires the evaluation of government actions or private activities permitted by government to determine their effects on the environment. When such an action could have a significant effect on the environment, the agency with primary responsibility over the approval of the project (the lead agency) is required to prepare an EIR. As stated in State CEQA Guidelines §15121:

An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information which may be presented to the agency (*when considering whether to approve a project*).

An EIR is the public document used to meet these requirements. The EIR must disclose: significant adverse environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects. For this EIR, an “impact” or “significant impact” is assumed to be an adverse effect on the environment.

This EIR is intended to provide information to the public and to decision makers regarding the potential environmental effects of approval and implementation of the City of Galt SOI Amendment project. Prior to considering approval of this request, the Sacramento LAFCo must certify that this EIR is adequate under CEQA and that they have considered the information herein. Upon making this finding, the Sacramento LAFCo may then consider approval of the City of Galt SOI Amendment project.

## 1.3 TYPE OF ENVIRONMENTAL IMPACT REPORT

In efforts to streamline the environmental review of the proposed SOI Amendment, the Sacramento LAFCo reused the City’s recently adopted General Plan Update: 2030 EIR (2009) to evaluate the SOI Amendment. Section 15153 of the State CEQA Guidelines regulates the later use of an EIR from an earlier project on a new project. Summarily, this Guideline requires that prior to using the previous EIR, a lead agency such as LAFCo must determine that the EIR adequately establishes the environmental setting of the new project, that it identifies the significant effects of the new project, and that it identifies mitigation measures or alternatives related to each significant effect (CEQA Guidelines §15153(b)(1)). To determine if the EIR adequately accomplishes this, LAFCo is required to prepare an Initial Study (CEQA Guidelines §15153(b)(1)). If LAFCo is able to answer these questions in the affirmative, LAFCo is then permitted to reuse the City’s EIR for its review of the SOI Amendment project. As shown in the DEIR for the proposed SOI Amendment, LAFCo has determined that reuse of the EIR is appropriate. In essence, the City’s certified EIR was used as LAFCo’s Draft EIR evaluating the SOI Amendment project. Therefore, the Galt SOI Amendment EIR is composed of the Draft Environmental Impact Report for the 2030 Galt General Plan, the Final Environmental Impact Report for the 2030 Galt General Plan, and the Environmental Checklist Evaluating the Suitability of the Galt General Plan Update: 2030 Environmental Impact Report to Assess the City of Galt SOI Amendment Project.



## 1.4 PROJECT SUMMARY

LAFCo is considering an application by the City of Galt for a Sphere of Influence Amendment that includes both a detachment of lands on the western boundary of the existing SOI, and the addition of lands north of Twin Cities Road between the Union Pacific Railroad Mainline and Cherokee Lane to the east.

As proposed, the City of Galt SOI Amendment consists of both an added area (Area A) of approximately 1,053 acres and the detachment of territory (Area B) of approximately 1,613 acres from the current SOI (see DEIR Figure 2). The amended SOI would result in a net decrease of approximately 560 acres from the existing SOI. Project Area A is not located within the existing Sphere of Influence, but is adjacent to the northern boundary of the City. Placement of Area A within the City's SOI boundary would indicate that LAFCo acknowledges that Area A is a location appropriate for future urbanization and annexation to the City of Galt.

The area to be detached from the current SOI (Area B) is located within the jurisdiction of Sacramento County; the detachment area has not been annexed by the City nor are any municipal utility services provided by the City.

### 1.4.1 PROJECT OBJECTIVES

As required by §15124(b) of the CEQA Guidelines, the following is a discussion of the objectives of the proposed City of Galt SOI Amendment project. The project applicant has identified the following objectives in proposing the project:

- To provide a logical and reasonable future physical boundary of the City of Galt; and,
- To aid in the comprehensive planning of future land uses in the project area.

## 1.5 MONITORING AND REPORTING PROGRAM AND FINDINGS

CEQA requires that public agencies carrying out or approving certain projects must adopt mitigation monitoring or reporting programs to ensure the implementation and effectiveness of mitigation measures. Since the DEIR for the City of Galt SOI Amendment project included reuse of the City's General Plan Update: 2030 Program EIR, mitigation measures adopted in the City's General Plan DEIR/FEIR were carried forward in the SOI Amendment project. All of the mitigation measures are the responsibility of the City or other agencies, and generally require the adoption or modification of General Plan Policies. Therefore, the finding for these measures would be that "[such] changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency" (CEQA Guidelines §15091(a)(2)).

CEQA Guidelines §15091(d) specifies that when making the finding, that "changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR" (CEQA Guidelines §15091(a)(1)), a monitoring program for these measures would be required:

“When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures” (CEQA Guidelines §15091(d)).

Since none of the mitigation measures in the General Plan Update: 2030 EIR are within the jurisdiction of LAFCo, and no findings required in subdivision (a)(1) would be made for the SOI Amendment project, a monitoring program for these measures would not be required.

The environmental commitments incorporated into the project outlined in the Galt SOI Amendment DEIR (pages 22-24 of the DEIR) will be made conditions of approval of the project. Because these conditions of approval would avoid or substantially lessen potentially significant environmental effects, in accordance with CEQA Guidelines §§ 15091(d) and 15097(a), a program for monitoring implementation of these conditions will be prepared.

...In order to ensure that the mitigation measures and **project revisions identified in the EIR** or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects.... (CEQA Guidelines §15097(a))

LAFCo has prepared a Monitoring and Reporting Program to ensure implementation of the environmental commitments prior to any annexation of the SOI Amendment territory by the City of Galt. Copies of the Monitoring and Reporting Program, which must be adopted upon approval of the City of Galt SOI Amendment project, may be reviewed online at [www.saclafco.org](http://www.saclafco.org).

## 2 PUBLIC COMMENT AND RESPONSE TO COMMENTS

---

### 2.1 PUBLIC COMMENTS AND RESPONSES

The California Environmental Quality Act (CEQA) requires public disclosure in an Environmental Impact Report (EIR) of all project environmental effects and encourages public participation throughout the EIR process. As stated in CEQA Guidelines §15200, the purposes of public review of environmental documents are:

- sharing expertise;
- disclosing agency analyses;
- checking for accuracy;
- detecting omissions;
- discovering public concerns; and,
- soliciting counter-proposals.

CEQA Guidelines §15201 states that “(p)ublic participation is an essential part of the CEQA process.” A public review period of no less than 30 days nor longer than 60 days is required for a Draft EIR (DEIR) under CEQA Guidelines §15105(a). If a State agency is a lead or responsible agency for the project, the public review period shall be at least 45 days. In this case, a review period extending from July 14, 2010 to August 30, 2010 was established.

The Sacramento Local Agency Formation Commission (LAFCo) is the lead agency for this project (i.e., the agency that has primary discretionary approval authority over portions of the project) and will certify the EIR during project consideration. There are no responsible agencies (i.e., agencies that have more limited discretionary approval authority than the lead agency) that will be required to use this EIR in their consideration of the proposed City of Galt Sphere of Influence (SOI) Amendment project.

During circulation of the DEIR from July 14, 2010 to August 30, 2010, the Sacramento LAFCo received three comments on the EIR. For every written comment received from the public, agencies, and organizations, LAFCo has provided a written response. No comments were delivered during the public hearing on August 4, 2010. The comments and response to comments are included in the following pages. A list of commenters is provided below.

For comments that advocate that the Sacramento LAFCo take a certain action, or where the comment has stated the belief or opinion of the author, the response to comment notes that LAFCo will consider the views of the commenter in LAFCo’s deliberation of the City of Galt SOI Amendment project. No other response to such a comment is provided.

**COMMENTER**

**COMMENT IDENTIFICATION**

*Federal Agency Comments*

None received.

*State Agency Comments*

None received.

*Local and Regional Agency Comments*

|   |   |
|---|---|
| Sacramento Metropolitan Air Quality Management District | A |
| Sacramento County Farm Bureau                           | B |

*Public Utility and Service Provider Comments*

|                                       |   |
|---------------------------------------|---|
| Sacramento Municipal Utility District | C |
|---------------------------------------|---|

*Citizen / Non-governmental Organizations Comments*

None received.

Letter A



Larry Greene  
AIR POLLUTION CONTROL OFFICER

August 3, 2010

SENT VIA E-MAIL ONLY

Mr. Peter Brundage, Executive Officer  
Sacramento Local Agency Formation Commission  
1112 I Street, Suite 100  
Sacramento, CA 95814

**Draft Environmental Impact Report for the City of Galt Sphere of Influence Amendment (LAFCO 06-09, SAC200400168M)**

Dear Mr. Brundage:

The Sacramento Metropolitan Air Quality Management District (SMAQMD) appreciates the opportunity to review the Draft Environmental Impact Report (DEIR) for the City of Galt Sphere of Influence (SOI) Amendment. SMAQMD staff has been engaged in the 2030 Galt General Plan development process and the resulting request to LAFCO from the City of Galt for an amendment to its SOI.

A-1

SMAQMD would like to confirm the environmental commitments described on pages 22 through 24 of the DEIR, which include the preparation of a 35% air quality mitigation plan and demonstration of compliance with Galt General Plan Policy COS-7.1: Greenhouse Gas Emission Reduction, are mitigation measures or conditions of approval that are enforceable by LAFCO and will be adhered to prior to approval of annexation of any land in the SOI amendment area.

It has been a pleasure working with LAFCO staff; they have been supportive of the SMAQMD's goal to mitigate air quality impacts from future growth in the SOI amendment area. Please contact Larry Robinson of my staff at (916) 874-4816 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Greene".

Larry Greene  
Executive Director/Air Pollution Control Officer

cc: Curt Camplon, City of Galt Community Development Director  
Larry Robinson, SMAQMD

777 12th Street, 3rd Floor ■ Sacramento, CA 95814-1908  
916/874-4800 ■ 916/874-4899 fax  
www.airquality.org



## **Response to Letter A**

**Commenter** Sacramento Metropolitan Air Quality Management District, Larry Greene, Executive Director/Air Pollution Control Officer  
August 3, 2010

---

A-1 The comment states that the Sacramento Metropolitan Air Quality Management District (SMAQMD) has been involved in the project process, and would like to confirm that the environmental commitments described on pages 22-24 of the DEIR are conditions of approval that will be adhered to prior to approval of annexation of land in the SOI amendment area.

The proposed City of Galt SOI Amendment includes environmental commitments that have been incorporated as a component of the project application as listed on pages 22-24 of the DEIR. Included in these environmental commitments is a requirement that the City of Galt prepare an Air Quality Mitigation Plan (AQMP) that would reduce ozone precursor emissions by 35 percent, or by 15 percent if the application occurs after adoption of the State Implementation Plan (SIP) and the City demonstrates that development is consistent with the SIP. According to the measure, the AQMP must be prepared at the time of submittal of any application to annex land within the SOI Amendment area. In addition, the City has made a commitment in the project description that the City will demonstrate compliance with Galt General Plan Policy COS 7-1, Greenhouse Gas Emission Reduction, at the time of application to annex land within the SOI Amendment area.

LAFCo has prepared a Monitoring and Reporting Program to ensure implementation of the environmental commitments prior to any annexation of the SOI Amendment territory by the City of Galt. At the time of application for any annexation of territory within the SOI Amendment area, LAFCo would require demonstration of compliance with the environmental commitments that have been made by the City, and approval of the annexation could not occur without satisfactory compliance. Because no environmental issue was raised by the comment, no modification of the EIR is necessary.

Letter B



**SACRAMENTO COUNTY FARM BUREAU**

8970 Elk Grove Boulevard • Elk Grove, California 95624-1946  
(916) 685-6958 • Fax (916) 685-7125

August 27, 2010

Peter Brundage  
Executive Officer  
Sacramento Local Agency Formation Commission  
1112 I Street, Suite 100  
Sacramento, CA 95814

**RE: City of Galt Sphere of Influence Amendment**

Dear Mr. Brundage;

Sacramento County Farm Bureau understands the City of Galt's need to expand in order to accommodate future population growth. However, because of agriculture's economic contribution to the county, region and California, the need for growth must be balanced with the need to protect the economic engine that drives the vitality of the area and provides food and fiber for people locally, regionally and around the world. Urban sprawl not only impacts agricultural operations, but negatively impacts agribusinesses such as feed stores, equipment repair shops, tractor dealerships and other agricultural support businesses which depend on the rural community, agriculture, small farms and backyard enthusiasts to stay in business. When agricultural land is converted to non-agricultural uses, food, fiber, important wildlife habitat and economic activity are all lost.

B-1

Plans to expand must be accompanied by identification of the water supply to support additional urban growth, the capacity to properly dispose of waste and the ability to adequately drain. Because the City of Galt and the area within the expanded SOI are entirely dependent on groundwater, care must be given to ensure that expansion does not negatively impact groundwater supplies for surrounding agricultural operations. The DEIR

B-2

*To Represent and Promote Agriculture in Sacramento  
County*

and the City of Galt General Plan should adequately address water supply, waste disposal and drainage capacity.

Finally, it will be impossible to protect the viability of agriculture and our incredibly productive family farms and ranches if we do not encourage efficient development regionally and require cities to make efficient use of lands already within their jurisdiction before expanding further into agricultural areas. Every jurisdiction must carefully consider any request to expand, annex or make land use changes. As urban sprawl takes place, farmland is paved over and farm operations are closed down due to urban-rural conflicts. The loss is forever.

B-3

Thank you for the opportunity to provide comments.

Sincerely,

Russell van Loben Sels,  
President

cc. Don Nottoli, County Board of Supervisor

## Response to Letter B

**Commenter** Sacramento County Farm Bureau, Russell van Loben Sels, President  
August 27, 2010

---

B-1 The comment states that the need for growth should be balanced with the need to protect the economically important agricultural uses in the areas surrounding the City of Galt. The conversion of agricultural land could result in the loss of wildlife habitat in addition to economic loss.

In pages 8 to 21 of the City of Galt SOI Amendment DEIR, the agricultural resources in Area A (area to be included in SOI) and Area B (area to be detached from SOI) are compared in order to evaluate if there would be any change in potential land use and farmland impacts with the “swapping” of Area B for Area A as the location of future urban development. As established in the DEIR, because prime agricultural resources are similar between Area A and Area B, there essentially would be no change in impacts to farmland with the proposed attachment of Area A and detachment of Area B under the SOI Amendment project. In fact, implementation of the SOI Amendment would result in 37.8 acres less prime farmland that would potentially be converted to urban uses.

Potential impacts to agricultural resources as evaluated in the Galt General Plan Update: 2030 and its application to the SOI Amendment project are discussed in Section II, *Agriculture and Forest Resources*, on pages 33-34 of the SOI Amendment DEIR. As discussed in the General Plan DEIR, buildout of the General Plan project area, including the SOI Amendment area, would result in the conversion of important farmlands. Policies included as part of the 2030 General Plan that would minimize this impact are summarized in the Galt SOI Amendment DEIR on page 34. While these policies would provide partial mitigation for agricultural conversion, they would not prevent the loss of important farmlands within the General Plan area. The City of Galt has included commitments as part of the SOI Amendment project application that would result in the establishment of permanent conservation easements at a ratio of one open space acre converted to urban land uses to one-half open space acre preserved, and at a ratio of one agriculture acre converted to urban land uses to one-half agriculture acre preserved. While this would reduce impacts due to agricultural conversion, the City’s commitments still would not prevent the loss of important farmlands within the SOI Amendment area. Therefore, the conversion of important farmland to urban and other uses would be considered significant and unavoidable with no additional feasible mitigation available. Because this potential effect is fully evaluated in the DEIR, no modification of the EIR would be necessary to respond to this comment.

One of the purposes of LAFCo is to discourage urban sprawl and direct growth away from prime agricultural lands. According to LAFCo policy, in reviewing proposals that could be expected to convert open space uses to non open space uses, “[d]evelopment or use of land for other than open-space uses shall be guided away from existing prime agricultural lands in open-space use toward areas containing nonprime agricultural lands, unless that action would not promote the planned, orderly, efficient development of an area” (GC §56377(a)). There are similar proportions of Farmland of Statewide Importance in the General Plan Study Area and the SOI Amendment project area (10,210 acres/42 percent vs. 492 acres/47

percent). However, compared to other areas in the General Plan Study Area, the SOI Amendment project area contains proportionately less prime agricultural lands (706 acres/3 percent vs. 1 acre/0.1 percent) (see Galt General Plan DEIR Figure 8-9 Important Farmlands and Williamson Act Lands in the Study Area and Table 8.9 FMMP Land Use Designations within the City of Galt's Study Area). Therefore, the SOI Amendment would represent a relatively decreased conversion of prime agricultural lands and could be considered a logical and reasonable extension of the City boundaries.

- B-2 The comment states that water supply, waste disposal, and drainage capacity should be addressed.

Potential impacts to water supply and waste disposal as evaluated in the Galt General Plan Update: 2030 and its application to the SOI Amendment project are discussed in Section XVII, *Utilities and Service Systems*, on pages 77-79 of the DEIR. Potential impacts to drainage are discussed in Section IX, *Hydrology and Water Quality*, on pages 56-57 of the DEIR.

Implementation of the proposed SOI Amendment project would result in the potential future urbanization of the project area, which would result in increased demand for utilities and service systems. However, the potential future urbanization of the SOI Amendment project area was considered as part of buildout in the General Plan Update: 2030 Program EIR, and any contribution to these impacts associated with the proposed SOI Amendment was included in the environmental analysis. General Plan policies, implementation programs, and mitigation measures summarized in the Galt SOI Amendment DEIR on pages 79-81 would address impacts to utilities and service systems for development in the project area, and no impacts not previously evaluated would be expected. In addition, the City of Galt has included commitments as part of the project application that would further minimize impacts due to possibly inadequate water supplies by providing a Plan for Services that demonstrates compliance with Federal Clean Drinking Water Act standards; and that demonstrates sufficient, sustainable potable water supplies adequate for projected needs are available to accommodate the buildout of the annexation territory, with no adverse impact to existing ratepayers.

**Wastewater Services:** The DEIR identified a significant and unavoidable impact to wastewater services since General Plan buildout would not meet the wastewater treatment and disposal requirements of the Regional Water Quality Control Board (RWQCB) and would require additional capacity to serve the project's projected demand in addition to existing commitments. At the time of EIR preparation, the City was working toward compliance with RWQCB requirements, but since a definitive time frame to achieve compliance with the requirements of the RWQCB and to increase the capacity of the City's Wastewater Treatment Plant (WWTP) could not be established at that time, the impact was determined to remain significant after mitigation. As stated in the City's Municipal Services Review (MSR), the SOI Amendment area is currently served by individual private septic systems on private property. Upon annexation, the SOI Amendment area would be served by the City of Galt Public Works Wastewater Division. The MSR identifies a number of wastewater treatment facility improvements that would be constructed over the next seven years that would improve treatment and increase capacity sufficient to serve the SOI Amendment area.



Sacramento County LAFCo Policies, Standards, and Procedures require that proposed annexations be consistent with applicable service elements in the City's General Plan and that adequate services be provided within the time frame needed for the inhabitants of the annexation area (Section I, Standard Number 4). The City of Galt has included commitments as part of the project application to ensure the adequate provision of wastewater services, and at the time of submittal of any application to annex territory within the SOI Amendment area, the City of Galt will submit a Plan for Services that demonstrates that sufficient capacity improvements at its WWTP have been constructed, or will be constructed commensurate with demand, to accommodate the buildout of the annexation area with no adverse impact to existing ratepayers. With these project commitments, any proposed annexation by the City within the SOI Amendment area would require the provision of adequate wastewater services consistent with LAFCo standards, and impacts to wastewater services would be less than significant with General Plan policies and implementation programs included below.

Implementation of the proposed SOI Amendment project would result in the potential future urbanization of the project area, which would result in an increased demand on groundwater supplies for urban and rural uses within the City; increased potential for water contamination; an increase in impervious surfaces and thereby the amount and speed of runoff; and increased potential damage from flooding. However, the potential future urbanization of the SOI Amendment project area was considered as part of buildout in the General Plan Update: 2030 Program EIR, and any contribution to these impacts associated with the proposed SOI Amendment was included in the environmental analysis. General Plan policies, implementation programs, and mitigation measures listed in the Galt SOI Amendment project DEIR would address impacts to water quality and storm drainage for development in the project area, and no impacts not previously evaluated would be expected. In addition, the City of Galt has included commitments as part of the project application that would further minimize impacts from development in floodplain areas by compliance with the Central Valley Flood Protection Plan (CVFPP) (as adopted), and with the regulations of all other applicable federal, state, and local agencies. LAFCo has prepared a Monitoring and Reporting Program to ensure implementation of the environmental commitments prior to any annexation of the SOI Amendment territory by the City of Galt.

Because these potential effects are fully evaluated in the DEIR, no modification of the EIR would be necessary to respond to this comment.

- B-3 The comment states that cities should make efficient use of lands already within their jurisdiction before expanding further into agricultural areas.

See response to comment B-1 for a discussion of potential impacts to agricultural uses and LAFCo's consideration of the SOI Amendment project with respect to logical growth. Also, see response to comment A-1. The proposed City of Galt SOI Amendment includes environmental commitments that have been incorporated as a component of the project application as listed on pages 22-24 of the DEIR. Included in these environmental commitments is a requirement that the City of Galt consult with the Sacramento Area Council of Governments (SACOG) regarding the Regional Blueprint and consistency with the Metropolitan Transportation Plan, in addition to a commitment to reduce ozone precursor emissions. These environmental commitments will likely result in more efficient

land use as the City grows. LAFCo has prepared a Monitoring and Reporting Program to ensure implementation of the environmental commitments prior to any annexation of the SOI Amendment territory by the City of Galt. Because no environmental issue was raised by the comment, no modification of the EIR is necessary.

Letter C



P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

**Date:** August 30, 2010

**To:** Sacramento Local Agency Formation Commission  
1112 I Street #100  
Sacramento, Ca 95814

**Subject:** Response to City of Galt sphere of Influence Amendment

**To:** Formation Commission

Through the SacLafCo.org web page the on-line DEIR for the City of Galt SOIA was reviewed. What was glaring was the omission of any reference to Electric service in document especially in the Utilities section. The only time Electricity is discussed was in a response to the letter from CSD's attorney where he alluded to many energy efficiency and green programs.

C-1

What I would expect is reference to where our electric lines will distribute power through-out the SOI. For example in other SOI documents that have been reviewed under a topic of Electricity we might find...

*"All electrical lines less than 69 kilovolts (kV) will be routed underground or overhead within a public utility easement outside the rights-of-way of streets in the SPA. All electrical lines equal to 69 kilovolts (kV) will be routed overhead in an easement outside the rights-of-way of streets in the SPA."*

In addition site specific information may be of value, with this potential land use it is expected that xx new substations would be required. We may respond like the following:

*"The number of electric substations and the aforementioned locations are based on preliminary information provided to SMUD and are subject to change if the electrical demands and/or land uses are revised."*

The District would normally concur or comment on the estimate of peak demand, but there is no reference to expected electrical needs.

Basically my comments are that they need to include information on the affect proposed changes will have on the Electric Utilities.

---

DISTRICT HEADQUARTERS • 6201 S Street, Sacramento, CA 95817-1899





P.O. Box 15830, Sacramento, CA 95852-1830; 1-888-742-SMUD (7683)

Thank you,

A handwritten signature in black ink, appearing to read "Jerry Clark", is written over the printed name and extends to the left, crossing over the "Thank you," text.

Jerry Clark  
Land Agent-Real Estate Services  
SMUD  
6201 S Street, B304  
Sacramento, CA 95817  
(916) 732-5246  
[Jclark2@smud.org](mailto:Jclark2@smud.org)

---

DISTRICT HEADQUARTERS • 6201 S Street, Sacramento, CA 95817-1899

## Response to Letter C

**Commenter** Sacramento Municipal Utility District (SMUD), Jerry Clark, Land Agent-Real Estate Services

August 30, 2010

---

C-1 This comment states that additional information should be included on the project's potential impacts to electric utilities. The comment includes examples of the type of information SMUD expects to see in the document, including reference to where the electric lines would distribute power and additional site-specific information.

As stated in the Galt SOI Amendment DEIR, impacts due to the inefficient use of energy from implementation of the Galt General Plan Update: 2030 were evaluated in Section 6.6, *Gas and Electric*, of the General Plan DEIR. Impacts due to the wasteful, inefficient, or unnecessary consumption of energy by residential, commercial, industrial, or public uses were found to be less than significant in the DEIR/FEIR, and no mitigation measures were identified or adopted by the City.

The Galt General Plan Update: 2030 DEIR (p 6-35) states that growth anticipated in the General Plan, including the SOI Amendment area, will increase the demand for additional energy supplies and utility infrastructure. The General Plan DEIR concludes that future development would occur in an area currently served with both adequate supplies of electricity and gas service. The MSR completed for the Galt SOI Amendment (July 2009) includes consultation with SMUD regarding service to the SOI Amendment area. According to that consultation, SMUD would be able to provide electricity for the undeveloped portion of the SOI Amendment area. The MSR also reported that there is adequate capacity to serve future development, and electrical infrastructure is already in place serving areas in the SOI Amendment area. The project would tie into existing overhead and underground facilities, and additional off-site extensions may be required.

The proposed Galt SOI Amendment project represents one of the first steps in the urbanization process. The City currently proposes no rezoning of the project area or development project review. The City land use designations set forth in the General Plan define the general urbanized uses that would be a probable future use in the SOI Amendment area. Should the City seek to annex the area in the future, the City would be required to prezone the area prior to LAFCo consideration of the annexation request. The City's annexation request and prezone would be subject to environmental review pursuant to CEQA, and the City would be required to prepare and certify an appropriate CEQA document prior to LAFCo consideration. Following rezoning and annexation, Tentative Subdivision Maps (TSM) would need to be prepared and approved prior to development. The details of necessary distribution facilities as identified in the comment letter would be more properly developed during the rezoning, annexation, and TSM process.

The comment states that additional detail regarding electrical distribution facilities is found in other SOI amendment documents. The section quoted includes reference to a SPA, or Specific Plan Area. Environmental review of a Specific Plan and associated annexation



represents the next step in the development process, and additional detail for the provision of electricity will be included at that time.

Because these potential effects are fully evaluated in the DEIR, no modification of the EIR would be necessary to respond to this comment.