

September 30, 2010

SENT VIA E-MAIL ONLY

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

**Twin Cities Road/Highway 99 Intersection Project Air Quality Study Report  
(SAC201001361)**

Dear Mr. Erias:

Thank you for providing the Air Quality Study Report for the Twin Cities Road/Highway 99 Intersection project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD staff is pleased that the installation of roundabouts to replace signal controlled, congested intersections will benefit air quality by directly reducing vehicle emissions and by providing the infrastructure needed for safe bicycle and pedestrian travel.

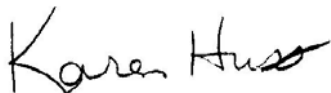
Overall, the SMAQMD believes the Air Quality Study Report was well done. Staff has the following questions/clarifications.

1. Although URBEMIS is an acceptable model to use to estimate construction emissions, the SMAQMD usually recommends use of the Roadway Construction Emissions Model for roadway related projects. The RCEM would have estimated both exhaust and fugitive dust emissions from the project.
2. Project design features to reduce air emissions described on pages 41-43 should be included as conditions of approval for the project or in the project bid specifications to ensure they are implemented.
3. The document indicates "No avoidance, minimization, and/or long-term mitigation measures are needed," (Page 43) but then mitigation measures are described in the pages following that statement. The mitigation measures described should be included as conditions of approval for the project or in a mitigation monitoring and reporting program. Since these mitigation measures may not all be feasible to implement, SMAQMD recommends the City of Galt require the contractor put together a plan to describe what measures will be included when the project is constructed.
4. Appendix E provides a copy of the SMAQMD's Enhanced Exhaust Control Practices, but the analysis in the document doesn't support the application of these practices since construction emissions are estimated to be below 85 pounds/day of NOx. The SMAQMD's [Basic Emission Control Practices](#) should be added to the appendix and the Enhanced Exhaust Control Practices should be removed.

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The SMAQMD appreciates being included early in the planning process and hopes these comments will assist in developing a strong environmental document. If you have any questions regarding these comments please contact me at (916) 874-4881 or [khuss@airquality.org](mailto:khuss@airquality.org).

Sincerely,

A handwritten signature in black ink that reads "Karen Huss". The signature is written in a cursive style with a large initial "K" and a long horizontal stroke at the end.

Karen Huss  
Associate Air Quality Planner/Analyst

cc: Larry Robinson, SMAQMD