



South Coast Air Quality Management District

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FAXED: NOVEMBER 22, 2005

November 22, 2005

Mr. Richard Masyczek
City of Hemet
Planning Department
445 East Florida Avenue
Hemet, CA 92543

**Mitigated Negative Declaration (MND) for Sam's Club
Conditional Use Permit 05-9
Hemet**

Dear Mr. Masyczek:

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Mitigated Negative Declaration.

Please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Mitigated Negative Declaration. The SCAQMD would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Steve Smith, Ph.D.
Program Supervisor, CEQA Section
Planning, Rule Development & Area Sources

Attachment

SS: CB

RVC051101-02
Control Number

**Mitigated Negative Declaration (MND) for Sam's Club: CUP 05-9
Hemet**

1. **Project Air Quality Emissions and URBEMIS 2002:** Although the lead agency used URBEMIS 2002, a model originally developed by the California Air Resources Board (CARB) and recommended for use by the SCAQMD to analyze air quality impacts from land use projects, there are several problems with the analysis that may result in underestimating air quality impacts.

First, on the first page of the detailed printout for construction emissions, the square footage listed is 2,000 instead of 135,300. Based on the construction analysis results, it is unclear how this discrepancy affects the overall emissions.

Second, the total number of daily vehicle trips appears to be substantially underestimated. According to the URBEMIS 2002 model, a discount store generates 41.8 trips per 1000 square feet per day or 5,655.5 trips per day, and a gas station generates 162.7 trips per pump per day or 1,953 trips per day for a total of 7,608.9 trips per day. Trip rates in the URBEMIS 2002 model are derived from the Institute of Transportation Engineers (ITE) Trip Generation Manual, 7th edition. The URBEMIS 2002 printout in Attachment 1, however, only shows 204.5 trips per day for the proposed project. To add additional confusion, the lead agency states on page 44 of the Transportation/Traffic discussion that the proposed project will generate an average of 6,939 trip ends. Given the magnitude of the number of trips generated by the proposed project, SCAQMD staff estimates that NO_x, CO and possibly VOC emissions would exceed the applicable daily operational significance thresholds recommended for use by the SCAQMD.

In light of the above comments, SCAQMD staff recommends that the lead agency rerun the URBEMIS model and present the revised project emission estimates in the Final MND.

2. **Mobile Source Diesel Toxics Emissions:** The traffic analysis shows on page 44 of the MND that the proposed project will generate an additional 6,939 vehicle trips per day. The MND does not provide a breakdown of the vehicles that will be generating these vehicle trips with respect to how many of them are medium heavy-duty or heavy heavy-duty diesel trucks. Depending on the truck routes and the distance to the nearest sensitive receptors, particulate emissions from the diesel-fueled trucks could potentially create significant adverse air toxics impacts. Without providing information on the breakdown or listing of the vehicles by vehicle type that would be servicing the proposed project at buildout, the lead agency cannot conclude that potential impacts from air toxics associated with the long-term use of diesel delivery trucks would be less than significant. SCAQMD staff recommends that the Final MND include a mobile source health risk assessment. Since the California Air Resources Board (CARB) designated particulate emissions from diesel-fueled engines as a carcinogen in August 1998,

the SCAQMD has prepared a methodology for performing an air toxics health risk analysis of truck emissions. This methodology can be accessed at the SCAQMD webpage at: http://www.aqmd.gov/ceqa/handbook/diesel_analysis.doc under Health Risk Assessment Guidance.

3. **Stationary Source Toxic Analysis:** The proposed project includes a 12-pump gas station. To receive a permit from the SCAQMD, the gasoline station must undergo a health risk assessment (HRA) pursuant to SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants. The HRA should be performed specifically for the gas station component. If there is a substantial amount of heavy-duty diesel truck trips per day, overlapping cancer risks from the diesel trucks and the gasoline station should be identified.

4. **CO Hot Spots:** The traffic analysis shows that there are three intersections, namely Sanderson Avenue and Florida Avenue, Gilmore Street and Acacia Avenue and Lyon Avenue and Florida Avenue, that will be operating at level of service E to F during the peak hours at buildout. The traffic analysis, however, does not show how the traffic generated by the proposed project will impact the volume-to-capacity ratios at those three intersections. This information is necessary because it determines whether or not carbon monoxide (CO) hotspots analysis is necessary. The SCAQMD recommends that if a level of service at any affected intersections deteriorates from C to D or if the proposed project increases the volume-to-capacity ratio of any intersections rated D or worse by two percent or more, then a CO hotspots analysis may be necessary. According to Tables 1 and 7 in Attachment 3, three intersections appear to meet these criteria: Kirby Street (NS) at Florida Avenue (EW); Lyon Avenue (NS) at Acacia Avenue (EW); and Palm Avenue (NS) at Florida Avenue (EW). SCAQMD staff therefore recommends that a CO hotspots analysis be done if a volume-to-capacity analysis determines the likelihood of a hotspots occurring.