South Coast
Air Quality Management District
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Santa-Monica-Malibu Unified School District
1651 61th Street
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Draft Environmental Impact Report (Draft EIR) for the Proposed Malibu Middle and High School Campus Improvements Project

The South Coast Air Quality Management District (AQMD) 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 into the Final CEQA document.

In the project description, the lead agency proposes a partial redevelopment program that includes demolition of approximately 15,041 square feet existing structures; construction of one new two-story building for classroom, library, and administrative office uses; and other renovation/upgrading of existing facilities and infrastructure resulting in a net total of approximately 76,694 square feet of new construction. Other construction would include a 150-space new parking lot adjacent to the athletic field, renovation of an existing building and other improvements covering 23.1 acres. In the Air Quality Section, the lead agency quantified the project's construction and operation air quality impacts and has compared those impacts with the AQMD's recommended regional and localized daily significance thresholds.

Upon review of the output sheets from the URBEMIS2007 land use computer model and Table 4.2-5, 4.2-6, and Table 4.2-8 in the Air Quality Section of the Draft EIR, the emissions from construction of the proposed project exceed the recommended daily regional and localized significance threshold for PM10 and localized significance threshold for PM2.5. AQMD staff is therefore concerned that all feasible mitigation measures be implemented to reduce these potentially significant air quality impacts from construction activities to sensitive receptors (i.e., the students and staff located at the school, Cabrillo Elementary School located west of the project site, United Methodist Church Nursery School to the south, and residences adjacent to the project). In addition to the mitigation measures proposed by the lead agency in the Draft EIR, AQMD staff recommends that additional mitigation measures be considered, if applicable and feasible. These recommended measures are described in the detailed comments attached to this

letter. Other mitigation measures to reduce the project's air quality impacts are also available at the AQMD website[1].

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The AQMD staff is available to work with the Lead Agency to address these issues and any other air quality questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Ian MacMillan
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IM:GM

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[1] http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html

Fugitive Dust Emissions From Construction Activities

1. In Appendix C (Air Quality Data), the lead agency shows the URBEMIS2007 model outputs that include different mitigation measures to control fugitive dust, including many identified in Tables 4.2-5 and 4.2-6. Unfortunately, due to a known calculation error within the URBEMIS2007 model,[2] applying all mitigation measures results in inaccurately high dust control efficiencies (e.g., up to 99% for this project). In order to correct this error, AQMD staff recommends that the lead agency only include the single highest control measure in the URBEMIS model run. Depending on each project, this would be either the application of water 3 times per day or chemical suppressants. The higher resultant PM10 emissions may exceed AQMD's regional thresholds.

2. In Appendix C, the URBEMI2007 computer modeling shows that off-road vehicle emissions have been estimated during the construction demolition phase. The modeling does not show estimates for a daily volume of building material demolished or on-road truck emissions from hauling debris to a disposal site(s). Therefore, the lead agency should include these emissions and other applicable information (the location and distance to potential disposal site(s), the number of daily haul trips, etc.) in the Final EIR. Applicable tables in the Air Quality Section of the Draft EIR should also be revised, as needed.

Construction Mitigation Measures

3. Because the lead agency has determined that construction emissions for particulate matter (PM10 and PM2.5) exceed the established significance thresholds, the AQMD staff recommends the following changes and additions to the mitigation measures listed starting on page 4.2-19, if applicable and feasible:

   Recommended change:

   MM4.2-9 The District will provide signs within loading areas clearly visible to truck drivers. These signs shall state that trucks cannot idle in excess of 5minutes ~~per trip~~on- or off-site.

   Recommended additions:

   - Install wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks or any equipment leaving the site each trip;
   - Water active sites at least twice daily;
   - All trucks hauling dirt, sand, soil, or other loose materials are to be covered;

[2] www.aqmd.gov/ceqa/models.html

- Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas or unpaved road surfaces;
- Pave road and road shoulders;
- Sweep streets at the end of the day if visible soil is carried onto adjacent public paved roads using SCAQMD Rule 1186 certified street sweepers or roadway washing trucks (recommend water sweepers with reclaimed water);
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph;
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation; and
- Allow grading activities only when the school is closed; and
- Reduce daily construction activity by prolonging the number of days for construction phases that exceed AQMD daily LST limits.

4. In the event the lead agency determines that constriction air quality impacts (see comment #2) exceed the recommended daily significance threshold for NOx, the following measures are recommended to further reduce construction NOx, if feasible:

❖ Require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following schedule adopted by other lead agencies in the South Coast Air Basin:

- April 1, 2010, to December 31, 2011: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 2 off-road emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- January 1, 2012, to December 31, 2014: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- Post-January 1, 2015: All off-road diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT device certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a

Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

- Reroute construction trucks away from congested streets or sensitive receptor areas;
- Use electricity from power poles rather than temporary diesel or gasoline power generators;
- Configure construction parking to minimize traffic interference;
- Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow;
- Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
- Schedule construction activities that affect traffic flow on the arterial system to off-peak hour to the extent practicable; and
- Reroute construction trucks away from congested streets or sensitive receptor areas.

Additional mitigation measures for consideration by the lead agency for off- and on-road engines and fugitive dust are also available at the AQMD website.[3]

[3] www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html