



Memorandum

TO: TROY A. WHITE, AICP, Dudek
FROM: Heidi Rous
RE: **MALIBU PARKS PUBLIC ACCESS ENHANCEMENT PLAN EIR PEER REVIEW**

DATE: August 20, 2010

PCR Services Corporation (PCR) was contracted to review portions of the draft and final Environmental Impact Report (EIR) for the Malibu Parks Public Access Enhancement Plan Public Works Plan (Proposed Plan) prepared by Dudek for the Santa Monica Mountains Conservancy (SMMC) and the Mountains Recreation & Conservation Authority (MRCA). This letter contains the results of the review related to the assessment of potential impacts to Air Quality and Global Climate Change (GCC).

PCR reviewed the relevant portions of the following documents:

Document Title/Section	Dated
Draft EIR, Section 2.0 PROJECT DESCRIPTION	February 2010
Draft EIR, Section 5.3 AIR QUALITY	February 2010
Draft EIR, Section 5.8 GLOBAL CLIMATE CHANGE	February 2010
Final EIR Section 1.0 MODIFIED REDESIGN ALTERNATIVE PROJECT DESCRIPTION	August 2010
Final EIR Section 14.0 MODIFIED REDESIGN ALTERNATIVE (MRA)	August 2010
Final EIR Section 15.0 ALTERNATIVES (INCLUDING THE MODIFIED REDESIGN ALTERNATIVE)	August 2010
Final EIR Sections 16.1 through 16.4	August 2010

I. AIR QUALITY

SUMMARY OF REVIEW

Based on my review, the air quality analyses and discussion is consistent with published guidelines for preparing air quality impact assessments under the California Environmental Quality Act (CEQA). The analyses were generally performed in accordance with industry standards. The

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EIR utilizes the significance criteria suggested by the South Coast Air Quality Management District (SCAQMD), which is appropriate for a land use project such as this located in the South Coast Air Basin. The methodology utilized to estimate the emissions expected to result from implementation of the Proposed Plan and other alternatives, including the use of the URBEMIS 2007 model (version 9.2.4), is appropriate, reasonable, technically sound, and generally consistent with guidance provided by the SCAQMD and California Air Resources Board (CARB). The Air Quality mitigation measures presented in the EIR are appropriate, feasible, and effective. The discussion of impacts is consistent with the results of the analyses. Responses to public comments are reasonable and consistent with the analyses and discussions.

SPECIFIC REVIEW COMMENTS

In support of the above general comments, I offer the following specific comment(s). It is important to note, that although this item merits mentioning, it does not result in any modification of conclusions regarding significance of impacts presented in the Final EIR.

- 1. Indirect Emissions.** The URBEMIS model includes algorithms to calculate emissions from area sources, such as on-site combustion of natural gas by camp hosts or other permitted users. Prior SCAQMD guidance suggested that the emissions resulting from power generation to produce the electricity consumed by occupants/users of a proposed project be quantified and included as part of the consideration of indirect emissions under CEQA. It should be noted, however, that the SCAQMD received a copy of the Draft EIR and did not request such emissions calculations. It has been the experience of this reviewer that such calculations are generally only required by the SCAQMD for large industrial facilities, with substantial electricity and/or natural gas demands. Consistent with established precedent within the region for non-industrial projects, the analyses in support of the EIR do not include the emissions from these source categories. It should be noted that vehicles are expected to be the major contributor of operational emissions resulting from a project such as this, and that based on my experience, the inclusion of these relatively minor sources of emissions would not increase reported levels in excess of applicable significance thresholds.

II. GLOBAL CLIMATE CHANGE

SUMMARY OF REVIEW

Based on my review, the global climate change analyses and discussion is reasonable in its approach. As stated in the Draft EIR, neither the SCAQMD nor the CARB had established specific significance criteria at the time the Draft EIR was released, and neither has promulgated numeric thresholds applicable to this project. The Office of Planning and Research (OPR) had not yet published formal guidelines for analyzing impacts from greenhouse gas (GHG) emissions or GCC

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under CEQA. The EIR establishes a significance criterion (p. 5.8-16) for this project that was widely used by other Lead Agencies on similar land use projects, and is considered appropriate given the era in which the project impact analyses were originally conducted. The criterion used closely matches one of the two Initial Study questions that OPR recommends be used for projects, effective March 18, 2010. The analyses were generally performed in accordance with industry standards. The methodology utilized to estimate GHG emissions is generally appropriate, reasonable, technically sound, and consistent with guidance provided by the California Climate Action Registry (CCAR). The discussion of impacts is consistent with the results of the analyses. Responses to public comments are reasonable and consistent with the analyses and discussions.

SPECIFIC REVIEW COMMENTS

In support of the above general comments, I offer the following specific comment(s). It is important to note, that although this item merits mentioning, it does not result in any modification of conclusions regarding significance of impacts presented in the Final EIR.

- 1. Indirect Emissions.** Similar to review comment number 1 listed above, the URBEMIS model runs omit GHG emissions from area sources such as on-site fossil fuel combustion and off-site power production. CCAR provides GHG emission factors for various power producers throughout California. It should be noted that vehicles are expected to be the major contributor of operational emissions resulting from a project such as this, and that based on my experience, the inclusion of these relatively minor sources of emissions would not significantly alter the green house gas emissions identified in the EIR. Further, since the EIR does not rely on a numeric GHG emission threshold to evaluate project significance, the relatively minor increase in reported GHG emissions levels if these were to be included, would not result in a revision of the significance determination.

REVIEWER QUALIFICATIONS

Heidi Rous, CPP, Director of Air Quality, Climate & Acoustics has over 20 years of experience in environmental consulting. Ms. Rous has managed Air Quality Impact Assessments (AQIA) and Health Risk Assessments (HRAs) required under various state and federal environmental regulations including NEPA, CEQA, RMPP, Cal ARP, AB2588, and Proposition 65. She has authored numerous Air Quality, Human Health Risk, and Risk of Upset sections to EIRs, EISs, Environmental Assessments (EA), greenhouse gas analyses, and permit processing for a variety of public and private clients. Similar projects include the Los Angeles County Department of Public Works fire department projects, Wildwood & Stough Canyon Improvement Project, and

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the Moreno Valley Wilderness Preserve and Preservation Area, as well as several peer review studies for San Bernardino Council of Governments as a part of an on-call environmental services contract. Her full-page resumes is attached.

Education

- B.S. Physics, California State Polytechnic University, Pomona, California, 1990

Professional Affiliations

- Certified Permitting Professional (CPP), Registered with South Coast Air Quality Management District, #B6027

Summary

Heidi Rous has over 20 years of experience in permitting, compliance, air quality planning, training, emissions estimations, and special studies.

Ms. Rous has managed Air Quality Impact Assessments (AQIA) and Health Risk Assessments (HRAs) required under various State and federal environmental regulations including National Environmental Policy Act (NEPA), California Environmental Quality Act (CEQA), RMPP, Cal ARP, AB2588, AB32, and Proposition 65. Ms. Rous has extensive expertise with all applicable modeling tools including ISCST, URBEMIS, HARP, DEGADIS, EMFAC, Cal3QHC, Caline4, and EDMS.

Ms. Rous has comprehensive experience with design and permitting of air pollution control devices, including BACT determinations, emission credit (ERC and RECLAIM) assistance, Risk Management Plans, and other compliance services. She has authored Start-up, Shut-down, and Malfunction plans, and frequently supervises emissions and performance testing of new, modified, and demonstration units. She is highly skilled in quantifying, modeling, mitigating emissions from stationary and mobile sources, and meeting the required regulatory compliance under the CAA, CWA, CERCLA, RCRA, EPCRA, and related statutes.

Experience

CEQA, NEPA, and Environmental Assessments: Ms. Rous has authored numerous Air Quality, Human Health Risk, and Risk of Upset sections to Environmental Impact Reports (EIR), Environmental Impact Statements (EIS), Environmental Assessments (EA), and other special studies. Clients include Port of Los Angeles, Port of Long Beach, South Coast Air Quality Management District (SCAQMD), Port of Oakland, United States Environmental Protection Agency, Federal Aviation Administration, Federal Highway Administration, numerous municipalities, and all major branches of the Department of Defense.

Greenhouse Gas (GHG) /Global Climate Change: Ms. Rous has performed numerous greenhouse gas and global climate change analyses for projects involving mobile and stationary sources. Ms. Rous is currently performing technical analyses of GHG emissions for a number of transportation and development projects throughout Southern California. She worked closely with the Land Use Services Division of the County of San Bernardino to develop interim significance criteria and methodology to quantify GHG emission reductions, including defining “business as usual” and determining the efficacy of control measures to reduce emissions from mobile and stationary sources. In addition, she performed the GHG analysis for the proposed LAX Central Utility Plan Replacement project. The analysis included construction emissions of criteria and toxic air pollutants and greenhouse gases (GHGs), and the beneficial impact (net reduction) of project implementation, due to increased energy efficiency.

Health Risk Assessments and Offsite Consequence Analyses: Ms. Rous has managed or performed numerous HRAs and Offsite Consequence Analyses (OCAs) for a diverse range of clients and source types, including manufacturing, surface coating, metal plating, landfills, aggregate plants, refineries, ports, and bulk storage terminals. In addition, she performs the requisite HRAs for new school development for LAUSD and other districts that include quantification of the health risk posed from exposure to mobile sources such as freeways and train operations. She has performed OCAs for water supply and waste water treatment facilities, power plants, cold storage facilities, and chemical plants.

Permitting and Compliance: Ms. Rous has provided comprehensive planning and compliance services to numerous facilities in the energy and heavy manufacturing sectors. Specific experience includes permitting of new and modified facilities throughout California, especially within the SCAQMD jurisdiction, including refineries, cogeneration facilities, electrical production plants, steel rolling mills, metal plating operations, aerospace manufacturing, food production landfills, and wastewater treatment plants. Tasks include regulatory analyses, emissions inventories, AQIAs, HRAs, and BACT determinations.

Ms. Rous has prepared and negotiated permit applications, performed audits, assessed air quality impacts and HRAs for petrochemical and energy clients such as ARCO, British Petroleum, Chevron, Shell, Valero, Unocal, Ultramar, Well Head Electric, Oklahoma Gas & Electric, and Southern California Edison. She has provided on-site compliance support (staff augmentation) at various times for ARCO and BP, and is familiar with all aspects of applicable health and safety requirements. With BP, Ms. Rous was responsible for GHG emission calculations, field surveys, and permitting of a new FCCU unit.

She has supported on-call permitting requests, such as review of Title V operating permits, completion of applications for authority to construct, case-by-case BACT determinations, and cost-effectiveness calculations.

