

City of Malibu

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September 12, 2011

Santa Monica-Malibu Unified School District
Attn: Janece Maez
1651 16th Street
Santa Monica, CA 90404

Re: Agency Comments / Draft Environmental Impact Report
Malibu Middle and High School Campus Improvements Project
30215 Morning View Drive, Malibu

Dear Ms. Maez:

Thank you for providing ample time to review the Draft Environmental Impact Report (DEIR) for the Malibu Middle and High School (MMHS) Campus Improvement Project. These comments are focused specifically on remaining items not adequately addressed within the DEIR. The City of Malibu requests the Santa Monica-Malibu Unified School District (SMMUSD) use these comments to provide additional studies and mitigation prior to adopting a Final EIR for the project.

Recreation

1(a). Figure 3.4 (Project Site Plan), Section 4.10, and Impact 4.10-1 – Installation of two new unlighted tennis courts

The proposed addition of two new tennis courts will have a significant impact on programs sponsored by the City and local youth sports organizations. The proposed site for the new tennis courts is referred to as the Malibu High School Auxiliary Field located approximately 50 yards north of the existing tennis courts. The City and American Youth Soccer Organization (AYSO) depend heavily on this auxiliary field for games and practices. The Joint Use Agreement between the City and SMMUSD provides for public use of the field 360 days of the year. This includes 167 days of scheduled use for games, practices, and camps, which equates to thousands of individual uses annually by local youth (reference Table No. 1 below).

Table No. 1 – Annual Scheduled Field Use and Participation

Program	Weeks	Days	Participants	Total Participation
AYSO	11	7	22	1,694
Youth Camps	12	5	15	900
Lacrosse	10	2	25	500
T-Ball	9	1	216	1,944
Total				5,038



cc: Council; CM; PL; PW; P&R; Project file

While converting the multi-use sports field to tennis courts preserves public access of this general area, it restricts recreational usage only to tennis. Currently, the existing tennis courts generate less than 10 percent of the annual recreational use in comparison to the multi-use field. The predominant recreation activities on the multi-use field include the City's afterschool sports programs, camps, and AYSO practices.

As proposed, the MMHS Improvement Plan will have an inverse effect by serving far fewer people than the existing site currently serves. As such, the Draft EIR does not properly assess the level of recreational impact associated with the project or propose adequate mitigation to offset such impacts.

1(b). Section 4.10, and Impact 4.10-1 – Recommended solution for the loss of the multi-use field

The recommended solution in the DEIR to the loss of the multi-use field is to move to another field. Unfortunately, there are not any fields available at MMHS to move the displaced programs noted under Table No. 1 above.

At minimum, the City is requesting SMMUSD to include one of the three mitigating options as part of the DEIR that would provide relief from the loss of the multi-use field.

Proposed Mitigation Option No. 1: Expand the scope of the DEIR's study area and project description to include the construction a new multi-purpose field on the vacant land northeast of the existing MHS football field. The City has approved a \$20,000 donation to SMMUSD to offset additional environmental review costs associated with this field addition. This option is only requesting study of the field area be included in the DEIR – not that the field be constructed as part of the MMHS Improvement Project scope.

Proposed Mitigation Option No. 2: Install synthetic turf on the Malibu High School football field as part of the project scope (note that this item is already included as an add alternate in the improvement plan). Each year the football field is closed to community use approximately six months to grow grass either before the football season begins, or maintain grass during the football season. Having synthetic turf would eliminate the overuse challenges often encountered in maintaining a natural grass turf field. A synthetic turf field would not only mitigate the loss of the multi-use field, it also addresses some of the community's need for more outdoor athletic facilities by increasing field accessibility from six months to twelve months annually.

Proposed Mitigation Option No. 3: Expand the scope of the DEIR's study area and project description to include the construction of a vacant two-acre parcel situated north of the existing softball field and adjacent to Clover Heights Avenue as a multi-use sports field. This option is only requesting study of the field area be included in the DEIR – not that the field be constructed as part of the MMHS Improvement Project scope.



Transportation and Traffic

2. **Section 4.11 and Impact 4.11-2 – Construction of the Proposed Project would result in significant short-term impacts to the level of service (LOS) at local intersections resulting from additional or pickup/drop-off queue lengths. Implementation of mitigation measure MM4.11-1 and MM4.11-2 would reduce this impact to less than significant.**

The recommended solution for MM4.11-1 is to work with the City and affected agencies to develop a Construction Impact Traffic Mitigation Plan that would temporarily require the contractor to reconfigure the drop-off/pick-up traffic flow that includes the following elements:

- i. Restrict construction activities resulting in lane closures: Construction activities that would result in potential lane closures along Morning View Drive, including, but not limited to reconstruction of the student drop-off/pick-up area and sidewalks along Morning View Drive, shall be scheduled to occur during summer months when the MMHS is not in session in order to eliminate conflicts with local traffic and pedestrian activities.
- ii. Public Information Program: A public information program shall be developed to advise motorists and pedestrians, and the MMHS administration, well in advance of impending construction activity. This could include the use of portable message signs and information signs along Morning View Drive.
- iii. Coordination with the City of Malibu, MMHS, and all affected agencies: All construction work shall be coordinated with affected agencies 5 to 10 days prior to the start of the construction work. SMMUSD shall coordinate with the City in the event that construction detours are needed, construction work encroaches into the public right-of-way, or any use of public streets surrounding the Proposed Project site for construction-related activities is needed. Pre-construction meetings will be held with affected agencies to adequately anticipate and plan for traffic control. Timely notification of schedule changes shall be provided to all involved City and Los Angeles County departments, such as the City Public Works and Planning Departments, and the Los Angeles County Sheriff and Los Angeles County Fire Departments.

Because of the significance of this temporary construction impact, the City feels that the failure to define the measures that will be specifically needed to allow construction to proceed identified in the items above must be revised to establish standards that shall be applied to all proposed traffic mitigation plans. Therefore, the City proposes the following standards that shall be met to design the traffic impact mitigation along Morning View Drive:

- i. Morning View Drive shall at all times maintain two thru lanes, one in each direction, for the duration of construction. A traffic control plan shall also be prepared and shall conform with the California Manual on Uniform Traffic Control Devices (MUTCD) and submitted to the City of Malibu Public Works Department for acceptance when obtaining the City Encroachment Permit for any and all work that will be performed in the City's

public right of ways. The traffic control plan shall include, but not be limited to, changeable message boards and full-time flagmen at the beginning and ends of all construction work zones.

- ii. The contractor shall post no parking signs along all impacted sections of Morning View Drive when on street parking would negatively affect the operations of Morning View Drive.
- iii. As stated in Impact 4.11-4 "...as part of Phase I (which occurs prior to any building demolition, reconstruction, or construction) will construct the new 150-space parking lot, adjacent and to the south the athletic field."

3. Section 4.11 Impact 4.11-3 – Construction Parking

The City realizes that parking in and around a construction site is difficult and that many construction workers will try to park as close to their assigned work area as possible. Since on-street parking during construction is subject to frequent closure, the City will require that the first sentence of MM4.11-3 be amended to read as follows:

"SMMUSD shall require that construction workers park in the designated staging area to provide adequate parking for all employees and visitors to the campus throughout the duration of construction activities of the Proposed Project."

The balance of the Mitigation Measure should remain unchanged.

4. Section 3.9.2 – Other Required Permits and Approvals

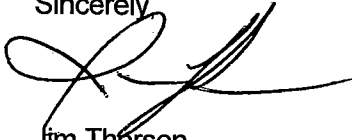
This section appears to have one minor error in required permits for this project. In the fourth bullet "City of Malibu" the Public Works Department is listed as requiring a Grading Permit. This should be changed to Encroachment Permit for work in Public Streets. Unless we are mistaken, the Office of State Architect is responsible for all onsite construction activities. Grading is an onsite activity which should be under the responsibility of the Office of State Architect.

As you are aware, CEQA requires the lead agency (i.e., the School District) to consult with responsible agencies (e.g., the City) throughout the preparation of the EIR. (Guidelines §15082, 15096.) Ultimately, as the decision-making body for Coastal Development Permit (CDP) No. 10-004, the City will need to review and consider the final/adopted EIR prior to acting upon or approving the project. Concerns raised in this response are intended to be reviewed during preparation of the EIR in order to avoid or minimize potential environmental impacts caused by the proposed development. The City's response is based on applicable policies, interpretations and land use plans in effect as of this date. Any changes to applicable policies, interpretations and/or land use plans may result in a different determination of items requiring further review.

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Agency Comments
SMMUSD MMHS DEIR

If you have any questions, please call me at (310) 456-2489 x226 or email at jthorsen@malibucity.org.

Sincerely



Jim Thorsen
City Manager

cc: Bob Stallings, Parks & Recreation Director
Bob Brager, Public Works Director
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