

Appendix H

Air Quality Study for the Proposed Kīhei High School Kīhei, Maui, Hawai'i

B.D. Neal & Associates – September 2011

**AIR QUALITY STUDY
FOR THE PROPOSED
KIHEI HIGH SCHOOL**

KIHEI, MAUI, HAWAII

**Prepared for:
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B.D. NEAL & ASSOCIATES

*Applied Meteorology * Air Quality * Computer Science*

P.O. BOX 1808 * KAILUA-KONA, HAWAII 96745 * TELEPHONE (808) 329-1627 * FAX (808) 331-8428

EMAIL: bdneal@kona.net

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1.0 SUMMARY

The State of Hawaii Department of Education is proposing to construct a new high school at Kihei, Maui. The proposed project will consist of high school facilities for 1,650 students on approximately 70 acres of land along Piilani Highway in Kihei. The school is expected to be completed and begin classes in 2015 with full enrollment by 2025. This study examines the potential short- and long-term air quality impacts that could occur as a result of construction and use of the proposed facilities and suggests mitigative measures to reduce any potential air quality impacts where possible and appropriate.

Both federal and state standards have been established to maintain ambient air quality. At the present time, seven parameters are regulated including: particulate matter, sulfur dioxide, hydrogen sulfide, nitrogen dioxide, carbon monoxide, ozone and lead. Hawaii air quality standards are generally comparable to the national standards although the state standards for carbon monoxide are more stringent than the national standards.

Regional and local climate together with the amount and type of human activity generally dictate the air quality of a given location. The climate of the project area is very much affected by its elevation near sea level and by nearby mountains. Haleakala shelters the area from the northeast trade winds, and local winds (such as land/sea breezes and upslope/downslope winds) affect the wind flow in the area much of the time. Temperatures in the project area are generally very consistent and warm with average daily temperatures ranging from about 63°F to 86°F. Rain-

fall in the project area is minimal with an average of only about 12 inches per year.

Except for periodic impacts from volcanic emissions (vog) and possibly occasional localized impacts from traffic congestion and local agricultural sources, the present air quality of the project area is believed to be relatively good. There is very little air quality monitoring data from the Department of Health for the project area, but the limited data that are available suggest that concentrations are generally well within state and national air quality standards.

If the proposed project is given the necessary approvals to proceed, it may be inevitable that some short- and/or long-term impacts on air quality will occur either directly or indirectly as a consequence of project construction and use. Short-term impacts from fugitive dust will likely occur during the project construction phase. To a lesser extent, exhaust emissions from stationary and mobile construction equipment, from the disruption of traffic, and from workers' vehicles may also affect air quality during the period of construction. State air pollution control regulations require that there be no visible fugitive dust emissions at the property line. Hence, an effective dust control plan must be implemented to ensure compliance with state regulations. Fugitive dust emissions can be controlled to a large extent by watering of active work areas, using wind screens, keeping adjacent paved roads clean, and by covering of open-bodied trucks. Other dust control measures could include limiting the area that can be disturbed at any given time and/or mulching or chemically stabilizing inactive areas that have been worked. Paving and landscaping of project areas early in the construction schedule

will also reduce dust emissions. Monitoring dust at the project boundary during the period of construction could be considered as a means to evaluate the effectiveness of the project dust control program. Exhaust emissions can be mitigated by moving construction equipment and workers to and from the project site during off-peak traffic hours.

After construction, motor vehicles coming to and from the proposed development will result in a long-term increase in air pollution emissions in the project area. To assess the impact of emissions from these vehicles, a computer modeling study was undertaken to estimate current ambient concentrations of carbon monoxide at intersections in the project vicinity and to predict future levels both with and without the proposed project. During worst-case conditions, model results indicated that present 1-hour and 8-hour carbon monoxide concentrations are well within both the state and the national ambient air quality standards. In the year 2015 without the project, carbon monoxide concentrations were predicted to decrease (improve) somewhat in the project area, and worst-case concentrations should remain well within air quality standards. With the project in the year 2015, carbon monoxide concentrations compared to the without-project case were projected to remain nearly unchanged, and worst-case concentrations should remain well within air quality standards. This would continue to be so in the year 2025 when full enrollment is reached. With or without the project, carbon monoxide concentrations in the project area during the next 15 years will likely decrease (improve) somewhat compared to existing concentrations. Implementing mitigation measures for traffic-related air quality impacts is probably unnecessary and unwarranted.

2.0 INTRODUCTION

The State of Hawaii Department of Education (DOE) is proposing to construct a new high school on approximately 70 acres of vacant land in Kihei on the island of Maui. The project site is located in Kihei along the mauka side Piilani Highway near Kulanihako'i Street (see Figure 1 for project location). The new school will include classrooms, library, auditorium, cafeteria, administration building, industrial arts building, ROTC facility, PE and athletic buildings and facilities, and parking areas. Access to the new high school will be provided via a new access roadway off Piilani Highway at the intersection of Kulanihako'i Street. The school is expected to open in the year 2015 with an initial enrollment of approximately 800 students. A full enrollment of 1,650 students is expected by 2025.

The purpose of this study is to describe existing air quality in the project area and to assess the potential short- and long-term direct and indirect air quality impacts that could result from construction and use of the proposed facilities as planned. Measures to mitigate potential project impacts are suggested where possible and appropriate.

3.0 AMBIENT AIR QUALITY STANDARDS

Ambient concentrations of air pollution are regulated by both national and state ambient air quality standards (AAQS). National AAQS are specified in Section 40, Part 50 of the Code of Federal Regulations (CFR), while State of Hawaii AAQS are defined in Chapter 11-59 of the Hawaii Administrative Rules. Table 1

summarizes both the national and the state AAQS that are specified in the cited documents. As indicated in the table, national and state AAQS have been established for particulate matter, sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone and lead. The state has also set a standard for hydrogen sulfide. National AAQS are stated in terms of both primary and secondary standards for most of the regulated air pollutants. National primary standards are designed to protect the public health with an "adequate margin of safety". National secondary standards, on the other hand, define levels of air quality necessary to protect the public welfare from "any known or anticipated adverse effects of a pollutant". Secondary public welfare impacts may include such effects as decreased visibility, diminished comfort levels, or other potential injury to the natural or man-made environment, e.g., soiling of materials, damage to vegetation or other economic damage. In contrast to the national AAQS, Hawaii State AAQS are given in terms of a single standard that is designed "to protect public health and welfare and to prevent the significant deterioration of air quality".

Each of the regulated air pollutants has the potential to create or exacerbate some form of adverse health effect or to produce environmental degradation when present in sufficiently high concentration for prolonged periods of time. The AAQS specify a maximum allowable concentration for a given air pollutant for one or more averaging times to prevent harmful effects. Averaging times vary from one hour to one year depending on the pollutant and type of exposure necessary to cause adverse effects. In the case of the short-term (i.e., 1- to 24-hour) AAQS, both national and state standards allow a specified number of exceedances each year.

The Hawaii AAQS are in some cases considerably more stringent than the comparable national AAQS. In particular, the Hawaii 1-hour AAQS for carbon monoxide is four times more stringent than the comparable national limit. On the other hand, the current Hawaii AAQS for sulfur dioxide are probably less stringent than the national standards. During the early part of 2010, the national primary annual and 24-hour standards for sulfur dioxide were revoked in favor of a new national 1-hour standard which is considered to be more stringent than the Hawaii short-term standards. The Hawaii AAQS for sulfur dioxide have not yet been updated to bring them in line with the national standards.

In 1993, the state revised its particulate standards to follow those set by the federal government. During 1997, the federal government again revised its standards for particulate, but the new standards were challenged in federal court. A Supreme Court ruling was issued during February 2001, and as a result, the new standards for particulate were finally implemented during 2005. To date, the Hawaii Department of Health has not updated the state particulate standards.

In September 2001, the state vacated the state 1-hour standard for ozone and an 8-hour standard was adopted that was the same as the national standard. During 2008, the national standard for ozone was again revised and made more stringent. The Hawaii standard for ozone has not yet been amended to follow the national standard.

During the latter part of 2008, EPA revised the standard for lead making the standard more stringent. So far, the Hawaii Department of Health has not revised the corresponding state standard for lead.

During early 2010, a national 1-hour primary standard for nitrogen dioxide was implemented. To date, Hawaii has not promulgated a 1-hour standard for nitrogen dioxide, but the Hawaii annual standard for this pollutant is more stringent than the national annual standard.

4.0 REGIONAL AND LOCAL CLIMATOLOGY

Regional and local climatology significantly affect the air quality of a given location. Wind, temperature, atmospheric turbulence, mixing height and rainfall all influence air quality. Although the climate of Hawaii is relatively moderate throughout most of the state, significant differences in these parameters may occur from one location to another. Most differences in regional and local climates within the state are caused by the mountainous topography.

The topography of Maui is dominated by the great volcanic masses of Haleakala (10,023 feet) and the West Maui Mountains (5,788 feet). The island consists entirely of the slopes of these mountains and of a connecting isthmus. Haleakala is still considered to be an active volcano and last erupted about 1790. The project site is located in the isthmus area between the West Maui Mountains and Haleakala at an elevation of about 200 feet.

Maui lies well within the belt of northeasterly trade winds generated by the semi-permanent Pacific high pressure cell to the north and east. Because the project area is located on the leeward side of Haleakala, it is sheltered much of the time from the northeast trade winds. Occasionally, when the trade winds are more northerly, the winds will sweep through the valley between the mountains and into the Kihei area. Local winds such as land/sea breezes and/or upslope/downslope winds also influence the wind pattern for the area. During the daytime, winds can typically be expected to move onshore because of seabreeze and/or upslope effects or because of the aerodynamic cavity caused by the trade winds flowing around Haleakala. At night, winds are often drainage winds that move downslope from Haleakala and out to sea. During winter, occasional strong winds from the south or southwest occur in association with the passage of winter storm systems.

Air pollution emissions from motor vehicles, the formation of photochemical smog and smoke plume rise all depend in part on air temperature. Colder temperatures tend to result in higher emissions of contaminants from automobiles but lower concentrations of photochemical smog and ground-level concentrations of air pollution from elevated plumes. In Hawaii, the annual and daily variation of temperature depends to a large degree on elevation above sea level, distance inland and exposure to the trade winds. Average temperatures at locations near sea level generally are warmer than those at higher elevations. Areas exposed to the trade winds tend to have the least temperature variation, while inland and leeward areas often have the most. The project site's lower elevation and leeward location results in warmer temperatures compared with many other parts of the island. At Puunene, which is a few miles to the north of the project area

and at an elevation of about 130 feet, average daily minimum and maximum temperatures are 63°F and 86°F, respectively [1]. Temperatures at the project site can be expected to be similar to this or slightly cooler due to the slightly higher elevation.

Small scale, random motions in the atmosphere (turbulence) cause air pollutants to be dispersed as a function of distance or time from the point of emission. Turbulence is caused by both mechanical and thermal forces in the atmosphere. It is often measured and described in terms of Pasquill-Gifford stability class. Stability class 1 is the most turbulent and class 6 is the least. Thus, air pollution dissipates the best during stability class 1 conditions and the worst when stability class 6 prevails. In the Pukualani area, stability classes 5 or 6 typically occur during the nighttime or early morning hours when temperature inversions form due to radiational cooling or to drainage flow from the nearby mountains. Stability classes 1 through 4 occur during the daytime, depending mainly on the amount of cloud cover and incoming solar radiation and the onset and extent of the sea breeze.

Mixing height is defined as the height above the surface through which relatively vigorous vertical mixing occurs. Low mixing heights can result in high ground-level air pollution concentrations because contaminants emitted from or near the surface can become trapped within the mixing layer. In Hawaii, minimum mixing heights tend to be high because of mechanical mixing caused by the trade winds and because of the temperature moderating effect of the surrounding ocean. Low mixing heights may sometimes occur, however, at inland locations and even at times along coastal areas early in the morning following a clear, cool, windless night.

Coastal areas also may experience low mixing levels during sea breeze conditions when cooler ocean air rushes in over warmer land. Mixing heights in Hawaii typically are above 3,000 feet (1,000 meters).

Rainfall can have a beneficial effect on the air quality of an area in that it helps to suppress fugitive dust emissions, and it also may "washout" gaseous contaminants that are water soluble. Rainfall in Hawaii is highly variable depending on elevation and on location with respect to the trade wind. The climate of the project area is relatively dry due to the leeward location. Historical records from Kihei, show that this area of Maui averages about only 12 inches of precipitation per year with the summer months being the driest [1].

5.0 PRESENT AIR QUALITY

Present air quality in the project area is mostly affected by air pollutants from vehicular, industrial, natural and/or agricultural sources. Table 2 presents an air pollutant emission summary for the island of Maui for calendar year 1993. This is the most recent year for which an island-wide emission inventory is available. The emission rates shown in the table pertain to manmade emissions only, i.e., emissions from natural sources are not included. As suggested in the table, most of the manmade particulate and sulfur oxides emissions on Maui originate from point sources, such as power plants and other fuel-burning industries. Nitrogen oxides emissions are roughly equally divided between point sources and area sources (mostly motor vehicle traffic). The majority of carbon monoxide emissions occur from area sources (motor vehicle traffic and sugar cane burning), while

hydrocarbons are emitted mainly from point sources. Emissions today are probably higher than those shown in the table, but the proportional relationships are likely about the same.

The largest sources of air pollution in the immediate project area are most likely agricultural operations and automobile traffic using local roadways. Emissions from these sources consist primarily of particulate, carbon monoxide and nitrogen oxides. Power plants burning diesel fuel are located several miles away. These sources mostly emit sulfur dioxide, nitrogen oxides and particulate. Volcanic emissions from distant natural sources on the Big Island also affect the air quality at times during kona wind conditions. By the time the volcanic emissions reach the project area, they consist mostly of fine particulate sulfate.

The State Department of Health operates a network of air quality monitoring stations at various locations around the state, but only very limited data are available for Maui Island. The only air quality data for the project area consists of particulate measurements collected at Kihei. Table 3 summarizes the data from the Kihei monitoring station. Annual second-highest 24-hour PM-10 particulate concentrations (which are most relevant to the air quality standards) ranged from 60 to 119 $\mu\text{g}/\text{m}^3$ between 2005 and 2008. Average annual concentrations ranged from 20 to 26 $\mu\text{g}/\text{m}^3$. One exceedance of the state standard was recorded during 2005. This was reported to be due to agricultural tilling operations in the area. Another exceedance of the standard was reported during 2007. This was considered an exceptional event due to a brush fire nearby. Monitoring of PM-10 at the Kihei monitoring station was discontinued in 2009.

As indicated in Table 3, PM-2.5 particulate is also monitored at the Kihei monitoring station. Annual 24-hour 98th percentile PM-2.5 particulate concentrations (which are most relevant to the air quality standards) ranged from 8 to 16 $\mu\text{g}/\text{m}^3$ between 2005 and 2009. Average annual concentrations ranged from 4 to 6 $\mu\text{g}/\text{m}^3$. One relatively high value was flagged during 2006 due to fireworks. No exceedances of the state standard were recorded during this period.

Given the limited air pollution sources in the area, it is likely that air pollution concentrations are near natural background levels most of the time, except possibly for locations adjacent to agricultural operations or near traffic-congested intersections. Present concentrations of carbon monoxide in the project area are estimated later in this study based on computer modeling of motor vehicle emissions.

6.0 SHORT-TERM IMPACTS OF PROJECT

Short-term direct and indirect impacts on air quality could potentially occur due to project construction. For a project of this nature, there are two potential types of air pollution emissions that could directly result in short-term air quality impacts during project construction: (1) fugitive dust from vehicle movement and soil excavation; and (2) exhaust emissions from on-site construction equipment. Indirectly, there also could be short-term impacts from slow-moving construction equipment traveling to and from the project site, from a temporary increase in local traffic caused by commuting construc-

tion workers, and from the disruption of normal traffic flow caused by lane closures of adjacent roadways.

Fugitive dust emissions may arise from the grading and dirt-moving activities associated with site clearing and preparation work. The emission rate for fugitive dust emissions from construction activities is difficult to estimate accurately. This is because of its elusive nature of emission and because the potential for its generation varies greatly depending upon the type of soil at the construction site, the amount and type of dirt-disturbing activity taking place, the moisture content of exposed soil in work areas, and the wind speed. The EPA [2] has provided a rough estimate for uncontrolled fugitive dust emissions from construction activity of 1.2 tons per acre per month under conditions of "medium" activity, moderate soil silt content (30%), and precipitation/evaporation (P/E) index of 50. Uncontrolled fugitive dust emissions at the project site would likely be somewhere near that level, depending on the amount of rainfall that occurs. In any case, State of Hawaii Air Pollution Control Regulations [3] prohibit visible emissions of fugitive dust from construction activities at the property line. Thus, an effective dust control plan for the project construction phase is essential.

Adequate fugitive dust control can usually be accomplished by the establishment of a frequent watering program to keep bare-dirt surfaces in construction areas from becoming significant sources of dust. In dust-prone or dust-sensitive areas, other control measures such as limiting the area that can be disturbed at any given time, applying chemical soil stabilizers, mulching and/or using wind screens may be necessary. Control regulations further stipulate that open-bodied trucks be covered at all times when in

motion if they are transporting materials that could be blown away. Haul trucks tracking dirt onto paved streets from unpaved areas is often a significant source of dust in construction areas. Some means to alleviate this problem, such as road cleaning or tire washing, may be appropriate. Paving of parking areas and/or establishment of landscaping as early in the construction schedule as possible can also lower the potential for fugitive dust emissions. Monitoring dust at the project property line could be considered to quantify and document the effectiveness of dust control measures.

On-site mobile and stationary construction equipment also will emit air pollutants from engine exhausts. The largest of this equipment is usually diesel-powered. Nitrogen oxides emissions from diesel engines can be relatively high compared to gasoline-powered equipment, but the annual standard for nitrogen dioxide is not likely to be violated by short-term construction equipment emissions. Also, the new short-term (1-hour) standard for nitrogen dioxide is based on a three-year average; thus it is unlikely that relatively short-term construction emissions would exceed the standard. Carbon monoxide emissions from diesel engines are low and should be relatively insignificant compared to vehicular emissions on nearby roadways.

Project construction activities will also likely obstruct the normal flow of traffic at times to such an extent that overall vehicular emissions in the project area will temporarily increase. The only means to alleviate this problem will be to attempt to keep roadways open during peak traffic hours and to move heavy construction equipment and workers to and from construction areas during periods of low traffic volume. Thus, most potential short-

term air quality impacts from project construction can be mitigated.

7.0 LONG-TERM IMPACTS OF PROJECT

After construction is completed, use of the proposed facilities will result in increased motor vehicle traffic in the project area, potentially causing long-term impacts on ambient air quality. Motor vehicles with gasoline-powered engines are significant sources of carbon monoxide. They also emit nitrogen oxides and other contaminants.

Federal air pollution control regulations require that new motor vehicles be equipped with emission control devices that reduce emissions significantly compared to a few years ago. In 1990, the President signed into law the Clean Air Act Amendments. This legislation required further emission reductions, which have been phased in since 1994. More recently, additional restrictions were signed into law during the Clinton administration, and these began to take effect during the past decade. The added restrictions on emissions from new motor vehicles will lower average emissions each year as more and more older vehicles are retired and leave the state's roadways. It is estimated that carbon monoxide emissions, for example, will go down by an average of about 20 percent per vehicle during the next 10 years due to the replacement of older vehicles with newer models.

To evaluate the potential long-term indirect ambient air quality impact of increased roadway traffic associated with a project such as this, computerized emission and atmospheric dispersion models

can be used to estimate ambient carbon monoxide concentrations along roadways leading to and from the project. Carbon monoxide is selected for modeling because it is both the most stable and the most abundant of the pollutants generated by motor vehicles. Furthermore, carbon monoxide air pollution is generally considered to be a microscale problem that can be addressed locally to some extent, whereas nitrogen oxides air pollution most often is a regional issue that cannot be addressed by a single new development.

For this project, four scenarios were selected for the carbon monoxide modeling study: (1) year 2011 with present conditions, (2) year 2015 without the project, (3) year 2015 with the project, and (4) year 2025 with the project. To begin the modeling study of the four scenarios, critical receptor areas in the vicinity of the project were identified for analysis. Generally speaking, roadway intersections are the primary concern because of traffic congestion and because of the increase in vehicular emissions associated with traffic queuing. For this study, the same key intersections identified in the traffic study were also selected for air quality analysis. These included the following intersections:

- Piilani Highway at Kaonoulu Street
- Piilani Highway at Kulanihakoi Street
- South Kihei Road at Kulanihakoi Street
- Piilani Highway at E. Waipuilani Road
- Piilani Highway at Piikea Avenue

The traffic impact report for the project [4] describes the existing and projected future traffic conditions and laneage

configurations of these intersections in detail. In performing the air quality impact analysis, it was assumed that all recommended traffic mitigation measures would be implemented.

The main objective of the modeling study was to estimate maximum 1-hour average carbon monoxide concentrations for each of the four scenarios studied. To evaluate the significance of the estimated concentrations, a comparison of the predicted values for each scenario can be made. Comparison of the estimated values to the national and state AAQS was also used to provide another measure of significance.

Maximum carbon monoxide concentrations typically coincide with peak traffic periods. The traffic impact assessment report evaluated morning and afternoon peak traffic periods. These same periods were evaluated in the air quality impact assessment.

The EPA computer model MOBILE6.2 [5] was used to calculate vehicular carbon monoxide emissions for each year studied. One of the key inputs to MOBILE6.2 is vehicle mix. Unless very detailed information is available, national average values are typically assumed, which is what was used for the present study. Based on national average vehicle mix figures, the present vehicle mix in the project area was estimated to be 34.3% light-duty gasoline-powered automobiles, 52.8% light-duty gasoline-powered trucks and vans, 3.6% heavy-duty gasoline-powered vehicles, 0.2% light-duty diesel-powered vehicles, 8.6% heavy-duty diesel-powered trucks and buses, and 0.5% motorcycles. For the future scenarios studied, the vehicle mix was estimated to change slightly with fewer light-

duty gasoline-powered automobiles and more light-duty gasoline-powered trucks and vans.

Ambient temperatures of 59 and 68 degrees F were used for morning and afternoon peak-hour emission computations, respectively. These are conservative assumptions since morning/afternoon ambient temperatures will generally be warmer than this, and emission estimates given by MOBILE6.2 generally have an inverse relationship to the ambient temperature.

After computing vehicular carbon monoxide emissions through the use of MOBILE6.2, these data were then input to an atmospheric dispersion model. EPA air quality modeling guidelines [6] currently recommend that the computer model CAL3QHC [7] be used to assess carbon monoxide concentrations at roadway intersections, or in areas where its use has previously been established, CALINE4 [8] may be used. Until a few years ago, CALINE4 was used extensively in Hawaii to assess air quality impacts at roadway intersections. In December 1997, the California Department of Transportation recommended that the intersection mode of CALINE4 no longer be used because it was thought the model has become outdated. Studies have shown that CALINE4 may tend to over-predict maximum concentrations in some situations. Therefore, CAL3QHC was used for the subject analysis.

CAL3QHC was developed for the U.S. EPA to simulate vehicular movement, vehicle queuing and atmospheric dispersion of vehicular emissions near roadway intersections. It is designed to predict 1-hour average pollutant concentrations near roadway

intersections based on input traffic and emission data, roadway/receptor geometry and meteorological conditions.

Although CAL3QHC is intended primarily for use in assessing atmospheric dispersion near signalized roadway intersections, it can also be used to evaluate unsignalized intersections. This is accomplished by manually estimating queue lengths and then applying the same techniques used by the model for signalized intersections. Currently, only one of the study intersections is signalized, Piilani Highway at Piikea Avenue. For the future scenarios without the project, in accordance with the traffic report, this was assumed to remain the case. For the future scenarios with the project, it was assumed that the intersection of Piilani Highway and Kulanihakai Street would also become signalized.

Input peak-hour traffic data were obtained from the traffic study cited previously. This included vehicle approach volumes, saturation capacity estimates, intersection laneage and signal timings (where applicable). All emission factors that were input to CAL3QHC for free-flow traffic on roadways were obtained from MOBIL6.2 based on assumed free-flow vehicle speeds corresponding to the posted speed limits (20 to 40 mph depending on location).

Model roadways were set up to reflect roadway geometry, physical dimensions and operating characteristics. Concentrations predicted by air quality models generally are not considered valid within the roadway-mixing zone. The roadway-mixing zone is usually taken to include 3 meters on either side of the traveled portion of the roadway and the turbulent area within 10 meters of

a cross street. Model receptor sites were thus located at the edges of the mixing zones near all intersections that were studied for all four scenarios. This implies that pedestrian sidewalks either already exist or are assumed to exist in the future. All receptor heights were placed at 1.8 meters above ground to simulate levels within the normal human breathing zone.

Input meteorological conditions for this study were defined to provide "worst-case" results. One of the key meteorological inputs is atmospheric stability category. For these analyses, atmospheric stability category 6 was assumed for the morning cases, while atmospheric stability category 4 was assumed for the afternoon cases. These are the most conservative stability categories that are generally used for estimating worst-case pollutant dispersion within suburban areas for these periods. A surface roughness length of 100 cm and a mixing height of 1000 meters were used in all cases. Worst-case wind conditions were defined as a wind speed of 1 meter per second with a wind direction resulting in the highest predicted concentration. Concentration estimates were calculated at wind directions of every 5 degrees.

Existing background concentrations of carbon monoxide in the project vicinity are believed to be at low levels. Thus, background contributions of carbon monoxide from sources or roadways not directly considered in the analysis were accounted for by adding a background concentration of 0.5 ppm to all predicted concentrations for 2011. Although increased traffic is expected to occur within the project area during the next several years with or without the project, background carbon monoxide concentrations may not change significantly since individual

emissions from motor vehicles are forecast to decrease with time. Hence, a background value of 0.5 ppm was assumed to persist for the future scenarios studied.

Predicted Worst-Case 1-Hour Concentrations

Table 4 summarizes the final results of the modeling study in the form of the estimated worst-case 1-hour morning and afternoon ambient carbon monoxide concentrations. These results can be compared directly to the state and the national AAQS. Estimated worst-case carbon monoxide concentrations are presented in the table for four scenarios: year 2011 with existing traffic, year 2015 without the project, year 2015 with the project and year 2025 with the project. The locations of these estimated worst-case 1-hour concentrations all occurred at or very near the indicated intersections.

As indicated in the table, the highest estimated 1-hour concentration within the project vicinity for the present (2011) case was 4.6 ppm. This was projected to occur during the morning peak traffic hour near the intersection of Piilani Highway and Piikea Avenue. Concentrations at other locations and times studied were 4.3 ppm or lower. All predicted worst-case 1-hour concentrations for the 2011 scenario were within both the national AAQS of 35 ppm and the state standard of 9 ppm.

In the year 2015 without the proposed project, the highest worst-case 1-hour concentration was again predicted to occur during the morning at the intersection of Piilani Highway and Piikea Avenue. A value of 4.0 ppm was predicted to occur at this location and

time. Peak-hour worst-case values at the other locations and times studied for the 2015 without project scenario ranged between 1.3 and 3.9 ppm. Compared to the existing case, concentrations generally decreased somewhat, and all projected worst-case concentrations for this scenario remained well within the state and national standards.

In the year 2015 with the proposed project, the predicted highest worst-case 1-hour concentration occurred again during the morning at the intersection of Piilani Highway and Piikea Avenue with a value of 4.1 ppm, slightly higher than the without project scenario. Other concentrations for this scenario ranged between 1.3 and 3.9 ppm. The predicted concentrations remained nearly unchanged at the locations studied compared to the without project scenario, and the values remained well within the state and federal standards.

In the year 2025 with the proposed project, worst-case 1-hour concentrations remained nearly unchanged, and concentrations were predicted to be slightly lower (better) than existing concentrations. All predicted worst-case 1-hour concentrations remained well within the standards.

Predicted Worst-Case 8-Hour Concentrations

Worst-case 8-hour carbon monoxide concentrations were estimated by multiplying the worst-case 1-hour values by a persistence factor of 0.5. This accounts for two factors: (1) traffic volumes averaged over eight hours are lower than peak 1-hour values, and (2) meteorological conditions are more variable (and hence more

favorable for dispersion) over an 8-hour period than they are for a single hour. Based on monitoring data, 1-hour to 8-hour persistence factors for most locations generally vary from 0.4 to 0.8 with 0.6 being the most typical. One study based on modeling [9] concluded that 1-hour to 8-hour persistence factors could typically be expected to range from 0.4 to 0.5. EPA guidelines [10] recommend using a value of 0.7 unless a locally derived persistence factor is available. Recent monitoring data for locations on Oahu reported by the Department of Health [11] suggest that this factor may range between about 0.2 and 0.6 depending on location and traffic variability. Considering the location of the project and the traffic pattern for the area, a 1-hour to 8-hour persistence factor of 0.5 will likely yield reasonable estimates of worst-case 8-hour concentrations.

The resulting estimated worst-case 8-hour concentrations are indicated in Table 5. For the 2011 scenario, the estimated worst-case 8-hour carbon monoxide concentrations for the five locations studied ranged from 1.2 ppm at the South Kihei Road/Kulanihakoi Street intersection to 2.3 ppm at the Piilani Highway/Piikea Avenue intersection. The estimated worst-case concentrations for the existing case were well within both the state standard of 4.4 ppm and the national limit of 9 ppm.

For the year 2015 without project scenario, worst-case concentrations ranged between 1.0 and 2.0 ppm, with the highest concentration occurring at Piilani Highway and Piikea Avenue. All predicted concentrations were within the standards.

For the 2015 with project scenario, worst-case concentrations were predicted to remain essentially unchanged compared to the without project case. Predicted worst-case concentrations ranged from 1.7 to 2.0 ppm with the highest concentration again occurring at the intersection of Piilani Highway and Piikea Avenue. All predicted 8-hour concentrations for this scenario were within both the national and the state AAQS.

In the year 2025 with the project, predicted worst-case 8-hour concentrations remained the same or changed only slightly. All predicted concentrations for this scenario were well within the national and the state AAQS.

Conservativeness of Estimates

The results of this study reflect several assumptions that were made concerning both traffic movement and worst-case meteorological conditions. One such assumption concerning worst-case meteorological conditions is that a wind speed of 1 meter per second with a steady direction for 1 hour will occur. A steady wind of 1 meter per second blowing from a single direction for an hour is extremely unlikely and may occur only once a year or less. With wind speeds of 2 meters per second, for example, computed carbon monoxide concentrations would be only about half the values given above. The 8-hour estimates are also conservative in that it is unlikely that anyone would occupy the assumed receptor sites (within 3 m of the roadways) for a period of 8 hours.

8.0 CONCLUSIONS AND RECOMMENDATIONS

The major potential short-term air quality impact of the project will occur from the emission of fugitive dust during construction. Uncontrolled fugitive dust emissions from construction activities are estimated to amount to about 1.2 tons per acre per month, depending on rainfall. To control dust, active work areas and any temporary unpaved work roads should be watered at least twice daily on days without rainfall. Use of wind screens and/or limiting the area that is disturbed at any given time will also help to contain fugitive dust emissions. Wind erosion of inactive areas of the site that have been disturbed could be controlled by mulching or by the use of chemical soil stabilizers. Dirt-hauling trucks should be covered when traveling on roadways to prevent windage. A routine road cleaning and/or tire washing program will also help to reduce fugitive dust emissions that may occur as a result of trucks tracking dirt onto paved roadways in the project area. Paving of parking areas and establishment of landscaping early in the construction schedule will also help to control dust. Monitoring dust at the project boundary during the period of construction could be considered as a means to evaluate the effectiveness of the project dust control program and to adjust the program if necessary.

During construction phases, emissions from engine exhausts (primarily consisting of carbon monoxide and nitrogen oxides) will also occur both from on-site construction equipment and from vehicles used by construction workers and from trucks traveling to and from the project. Increased vehicular emissions due to disruption of traffic by construction equipment and/or commuting construction workers can be alleviated by moving equipment and personnel to the site during off-peak traffic hours.

After construction of the proposed project is completed and it is fully occupied, carbon monoxide concentrations in the project area should remain nearly unchanged compared to without the project and concentrations will likely decrease (become better) compared to the existing case. Worst-case concentrations should remain well within both the state and the national ambient air quality standards with or without the project. Implementing any air quality mitigation measures for long-term traffic-related impacts is probably unnecessary and unwarranted.

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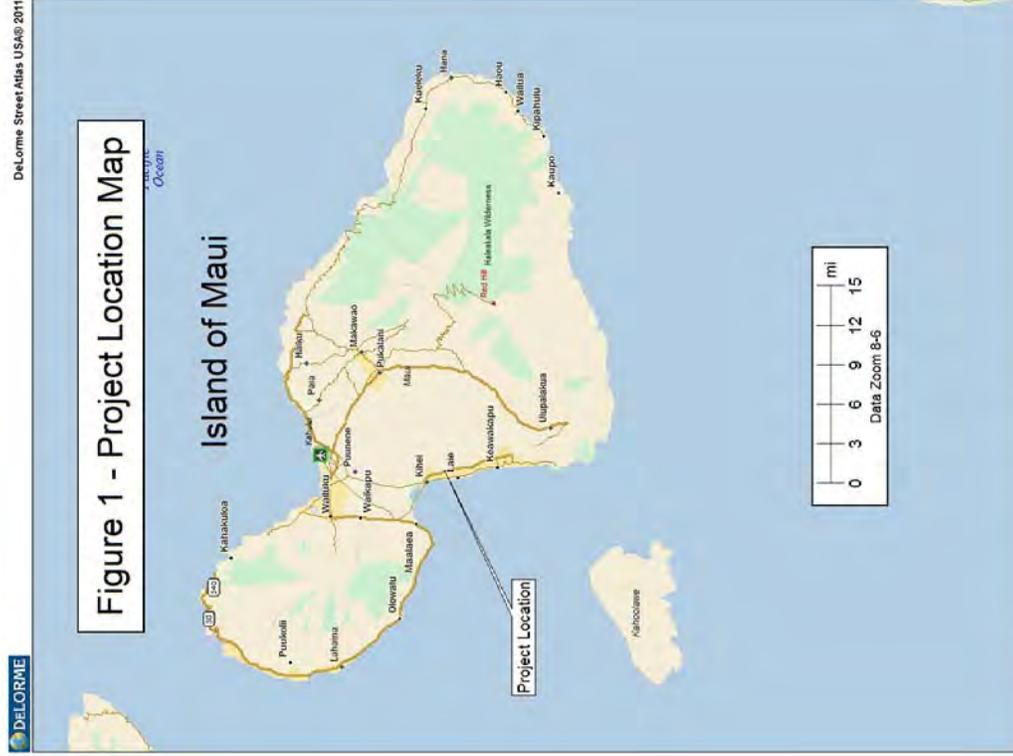


Table 1
SUMMARY OF STATE OF HAWAII AND NATIONAL
AMBIENT AIR QUALITY STANDARDS

Pollutant	Units	Averaging Time	Maximum Allowable Concentration		
			National Primary	National Secondary	State of Hawaii
Particulate Matter (<10 microns)	µg/m ³	Annual	-	-	50
		24 Hours	150 ^a	150 ^a	150 ^b
Particulate Matter (<2.5 microns)	µg/m ³	Annual	15 ^c	15 ^c	-
		24 Hours	35 ^d	35 ^d	-
		24 Hours	-	-	0.03
		3 Hours	-	-	0.14 ^b
Sulfur Dioxide	ppm	1 Hour	-	0.5 ^b	0.5 ^b
		1 Hour	0.075 ^e	-	-
Nitrogen Dioxide	ppm	Annual	0.053	0.053	0.04
		1 Hour	0.100 ^f	-	-
Carbon Monoxide	ppm	8 Hours	9 ^b	-	4.4 ^b
		1 Hour	35 ^b	-	9 ^b
Ozone	ppm	8 Hours	0.075 ^g	0.075 ^g	0.08 ^g
		3 Months	0.15 ^b	0.15 ^h	-
Lead	µg/m ³	Quarter	1.5 ⁱ	1.5 ⁱ	1.5 ⁱ
		1 Hour	-	-	35 ^b
Hydrogen Sulfide	ppm	1 Hour	-	-	35 ^b

^a Not to be exceeded more than once per year on average over three years.

^b Not to be exceeded more than once per year.

^c Three-year average of the weighted annual arithmetic mean.

^d 98th percentile value of the 24-hour concentrations averaged over three years.

^e Three-year average of annual fourth-highest daily 1-hour maximum.

^f 98th percentile value of the daily 1-hour maximum averaged over three years.

^g Three-year average of annual fourth-highest daily 8-hour maximum.

^h Rolling 3-month average.

ⁱ Quarterly average.

Table 2
AIR POLLUTION EMISSIONS INVENTORY FOR
ISLAND OF MAUI, 1993

Air Pollutant	Point Sources (tons/year)	Area Sources (tons/year)	Total (tons/year)
Particulate	63,275	7,030	70,305
Sulfur Oxides	6,419	nil	6,419
Nitrogen Oxides	7,312	8,618	15,930
Carbon Monoxide	4,612	20,050	24,662
Hydrocarbons	1,991	234	2,225

Source: Final Report, "Review, Revise and Update of the Hawaii Emissions Inventory Systems for the State of Hawaii", prepared for Hawaii Department of Health by J.I. Shoemaker & Associates, Inc., 1996

Table 4

ESTIMATED WORST-CASE 1-HOUR CARBON MONOXIDE CONCENTRATIONS
ALONG ROADWAYS NEAR KIHAI HIGH SCHOOL PROJECT
(parts per million)

Roadway Intersection	Year/Scenario							
	2011/Present		2015/Without Project		2015/With Project		2025/With Project	
	AM	PM	AM	PM	AM	PM	AM	PM
Piilani Highway at Kaonoulu Street	4.0	2.3	3.6	2.2	3.4	2.2	3.3	2.0
Piilani Highway at Kulanihakoī Street	4.1	2.3	3.7	2.1	3.7	2.1	3.8	2.1
South Kihei Road at Kulanihakoī Street	2.3	1.4	2.0	1.3	2.0	1.3	2.0	1.3
Piilani Highway at E. Waipuilani Road	4.3	2.4	3.9	2.2	3.9	2.2	4.0	2.1
Piilani Highway at Piikea Avenue	4.6	3.0	4.0	2.7	4.1	2.7	4.1	2.6

Hawaii State AAQS: 9
National AAQS: 35

Table 3

ANNUAL SUMMARIES OF AIR QUALITY MEASUREMENTS FOR
MONITORING STATIONS NEAREST KIHAI HIGH SCHOOL PROJECT

Parameter / Location	2005	2006	2007	2008	2009
Particulate (PM-10) / Kihei					
24-Hour Averaging Period:					
No. of Samples	337	337	326	331	-
Highest Concentration (µg/m ³)	155	72	281*	78	-
2 nd Highest Concentration (µg/m ³)	119	66	93	60	-
No. of State AAQS Exceedances	1	0	1*	0	-
Annual Average Concentration (µg/m ³)	25	22	26	20	-
Particulate (PM-2.5) / Kihei					
24-Hour Averaging Period:					
No. of Samples	108	109	78	58	358
Highest Concentration (µg/m ³)	10	30 ^b	11	16	26
98 th Percentile Concentration (µg/m ³)	8	10	10	15	16
No. of State AAQS Exceedances	0	0	0	0	0
Annual Average Concentration (µg/m ³)	5	5	5	6	4

*Exceptional event (brush fire)

^bData flagged due to fireworks

Source: State of Hawaii Department of Health, "Annual Summaries,
Hawaii Air Quality Data, 2005 - 2009"

Table 5

ESTIMATED WORST-CASE 8-HOUR CARBON MONOXIDE CONCENTRATIONS
ALONG ROADWAYS NEAR KIHEI HIGH SCHOOL PROJECT
(parts per million)

Roadway Intersection	Year/Scenario			
	2011/Present	2015/Without Project	2015/With Project	2025/With Project
Piilani Highway at Kaonoulu Street	2.0	1.8	1.7	1.6
Piilani Highway at Kulanihakoi Street	2.0	1.8	1.8	1.9
South Kihei Road at Kulanihakoi Street	1.2	1.0	1.0	1.0
Piilani Highway at E. Waipuilani Road	2.2	2.0	2.0	2.0
Piilani Highway at Piikea Avenue	2.3	2.0	2.0	2.0

Hawaii State AAQS: 4.4
National AAQS: 9