III. AIR QUALITY -- Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?

Finding: Less than significant impact

Air quality in the United States is governed by the Federal Clean Air Act (CAA). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). At the federal level, the CAA is administered by the United States Environmental Protection Agency (USEPA). In California, the CCAA is administered by the California Air Resources Board (CARB) at the state level and by the Air Quality Management Districts at the regional and local levels.

The USEPA is responsible for enforcing the Federal CAA. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS) required under the 1977 CAA and subsequent amendments.

In California, CARB, which became part of the California Environmental Protection Agency (CalEPA) in 1991, is responsible for meeting the state requirements of the Federal CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride and visibility reducing particles.

The South Coast Air Quality Management District (SCAQMD) monitors air quality within the project area. SCAQMD is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (SCAB). Specifically, SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain state and federal ambient air quality standards in the district. SCAQMD is also responsible for establishing permitting requirements for stationary sources and ensuring that new, modified, or relocated stationary sources do not create net emission increases and therefore, are consistent with the region's air quality goals.

All areas designated as non-attainment under the CCAA are required to prepare plans showing how the area would meet the state air quality standards by its attainment dates. The Air Quality Management Plan (AQMP) is the region's plan for improving air quality in the region. It addresses the CAA and CCAA requirements and demonstrates attainment with ambient air quality standards. The AQMP is prepared by the SCAQMD and the Southern California Association of Governments (SCAG). The AQMP provides policies and control measures that reduce emissions to attain both state and federal ambient air quality standards by their applicable deadlines. Environmental review of individual projects within the SCAB must demonstrate that daily construction and operational emissions thresholds, as established by the SCAB, would not be exceeded.

The 2003 AQMP is the most recent air quality plan adopted by the SCAQMD. The 2003 AQMP updates the attainment demonstration for the federal standards for ozone and PM_{10}, replaces the 1997 attainment demonstration for the federal CO standard, provides a basis for a CO maintenance plan for the future, and updates the maintenance plan for the federal NOx standard that the SCAB has met since 1992. The 2003

AQMP also addresses several state and federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes and new air quality modeling tools.

The SCAQMD has jurisdiction over an approximately 10,743-square-mile area of the SCAB. This area includes all of Orange County, Los Angeles County (except for Antelope Valley), the western urbanized portions of San Bernardino County, and the western and Coachella Valley portions of Riverside County. Ambient pollution concentrations recorded in Los Angeles County are among the highest in the four counties comprising the SCAB.

Air quality studies generally focus on five pollutants that are most commonly measured and regulated: carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and respirable particulate matter (PM_{10} and PM_{25}). Compliance with the AQMP and other air quality plans is assessed for both construction and operational phases in order to determine if a project will result in a significant air quality impact.

Construction Impacts

Construction for the project would generate pollutant emissions from the following construction activities: (1) demolition, (2) grading, (3) construction worker travel, (4) delivery/hauling of supplies/debris to/from site, and (5) fuel combustion by construction equipment. These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. **Table 3: EstimatedDaily Construction Emissions** identifies estimated daily emissions associated with construction of the project. As shown, estimated daily construction emissions are not anticipated to exceed any of the established SCAQMD construction thresholds. The project will result in a less than significant construction air quality impact. Furthermore, implementation of Rule 403 as required by the SCAQMD will further reduce any potential construction air quality impacts to a less than significant level. Therefore, the project will result in a less than significant construction air quality impact.

TABLE 3
DAILY CONSTRUCTION EMISSIONS

EMISSION SOURCE		CO	ROG	NOX	SOX	PM10
Tracked Loader	Hourly Emission Factor[1]	0.201	0.095	0.83	0.076	0.059
	Peak Daily Emission	1.61	0.76	6.64	0.61	0.47
Bulldozer	Hourly Emission Factor[2]	0.675	0.15	1.70	0.143	0.14
	Peak Daily Emission	5.40	1.20	13.60	1.14	1.12
Haul Trucks[3]	Hourly Emission Factor	5.21	0.63	3.66	0.29[7]	0.39
	Peak Daily Emission	11.02	1.33	7.74	0.61	0.82
Worker Travel[4,5]	Hourly Emission Factor	2.02	0.09	0.29	0.05[7]	0.105
	Peak Daily Emission	1.85	0.07	0.27	0.05	0.11
Total Daily Construction Emissions[8]		24.29	3.67	28.93	2.51	29.11[6]
SCAQMD Threshold (pounds per day)		550	55	55	150	150
Exceed Threshold		No	No	No	No	No

[1]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-8-A. Assumes 8 hour workday. Pounds per hour.
[2]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-8-A. Assumes 8 hour workday. No bulldozer category is specified therefore, the Miscellaneous category was used. Pounds per hour.
[3]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-5-K-9. Assumes worst case construction start in year 2007, located in Area 2, 35 miles per hour; 20 mile round trip to landfill, 6 trucks per hour. Hourly emission factor measured in grams per mile.
[4]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-17. Assumes 12 workers based on peak construction of 23,130 square feet of additional hangar and office space, capital improvements valued at approximately $3.3 million.
[5]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-5-J-9. Assumes worst case construction start in year 2007, location in Area 2, 35 miles per hour, 40 miles round trip per worker.
[6]Includes 26.4 pounds of fugitive dust per day per acre disturbed. SCAQMD, CEQA Air Quality Handbook, April, 1993. Page 9-3.
[7]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-5-L.
[8]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-5-L. Pounds per day.

Operational Emissions

Aircraft operations and motor vehicles would be the predominant source of long-term air emissions. According to the CEQA Air Quality Handbook Screening Criteria, a project with operations that exceed 15 daily commercial flights could be considered to have a significant operational air quality impact.[2] The proposed project is anticipated to result in approximately 40 monthly operations (takeoffs and landings), which would produce approximately 1.3 flights per day. As a result, the proposed project is anticipated to result in a less than significant operational air quality impact due to aircraft activity.

According to the trip generation prepared for the project, the project is anticipated to generate approximately 39 additional daily vehicle trips.[3] As shown in **Table 4: Operational Emissions**, the project would not exceed the established threshold of any criteria pollutant due to increased vehicle trips

[2]*CEQA Air Quality Handbook, Table 6-2 Screening Table for Operation - Daily Thresholds of Potential Significance for Air Quality.* South Coast Air Quality Management District. April 1993.

[3]*Trip Generation Forecast, Air Center Aviation Van Nuys Airport.* Linscott, Law & Greenspan, Engineers. August 28, 2006.

and will result in a less than significant operational air quality impact due to vehicular trips.

TABLE 4
OPERATIONAL EMISSIONS

EMISSION SOURCE	CO	ROG	NOX	SOX	PM10
Generation rate (grams/mile)[1]	1.75	0.07	0.26	0.05	0.105
Daily Emissions (Pounds per day)[2]	1.50	0.06	0.22	0.04	0.09
SCAQMD Threshold (pounds per day)	550	75	100	150	150
Exceed Threshold	No	No	No	No	No

[1]*SCAQMD, CEQA Air Quality Handbook*, April, 1993. Table A9-5-K-9. Assumes operations in year 2007, located in Area 2, 35 miles per hour. Hourly emission factor measured in grams per mile.
[2]Assumes 10 miles per trip.

Consistency with the AQMP

Criteria for determining consistency with the AQMP is defined in the SCAQMD CEQA Air Quality Handbook. There are two key indicators of consistency.

Consistency Criterion No. 1: *The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

The violations that Consistency Criterion No. 1 refers to are the CAAQS. SCAQMD has identified CO as the best indicator pollutant for determining whether air quality violations would occur because it is most directly related to automobile traffic. The project is anticipated to generate a maximum of 39 net new daily trips and will not create or exacerbate existing violations of the State one- and eight-hour CO standards. Therefore, the project complies with Consistency Criterion No. 1.

Consistency Criterion No. 2: *The proposed project will not exceed the assumptions in the AQMP in 2010 or increments based on the year of project build-out phase.*

AQMP growth assumptions are generated by SCAG. SCAG derives its assumptions, in part, based on the General Plans of cities located within the SCAG region. Therefore, if a project does not exceed the growth projections in the General Plan, then it is consistent with the growth assumptions in the AQMP.

The project is not growth inducing. The project is estimated to increase employment on the site from fourteen to twenty employees, an increase of six employees, which is not sufficiently large to call into question the employment forecasts for the subregion adopted by SCAG. The existing zoning (M2) and General Plan designation (Light Manufacturing) allow for the current and proposed use as an aircraft landing field. The project proposes to replace the existing hangar and office facilities with similar uses. The project will be consistent with the zoning and General Plan designation on the project site. Therefore, the

project would be considered consistent with Consistency Criterion No. 2

The project is considered to be consistent with Consistency Criteria 1 and 2 and is therefore, considered consistent with the AQMP. The project will result in a less than significant air quality impact.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Finding: Less than significant impact

As shown in ***Section III.a, Air Quality***, the project will not violate any air quality standards and will not contribute substantially to an existing or projected air quality violation. Therefore, the project will result in a less than significant air quality impact.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Finding: Less than significant impact

Established thresholds for criteria pollutants consider the cumulative net increase of criteria pollutants in a project region. As shown in ***Section III.a, Air Quality***, the project will not exceed the established pollutant thresholds for any criteria pollutant during construction or operations. Therefore, the project will result in a less than significant cumulative air quality impact.

d) Expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant impact

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Locations that may contain a high concentration of a highly sensitive population groups are called sensitive receptors and include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and parks. The nearest sensitive receptors to the project site is a mobile home park located approximately one quarter mile southeast of the subject site on the eastern side of Woodley Avenue, a major highway. As shown in the previous sections, the project will not result in the exceedance of established SCAQMD thresholds for any of the identified criteria pollutants. Additionally, the project is proposing to replace existing aviation operations at VNY and will not introduce a new source of air pollution into the project vicinity. Therefore, the project will result in a less than significant air quality impact and will not expose sensitive receptors to substantial pollutant concentrations.

e) Create objectionable odors affecting a substantial number of people?

Finding: Less than significant impact

The project site is currently developed with aviation facilities. Under existing conditions, aircraft maintenance takes place on site, primarily within the existing hangar structures which helps to control

objectionable odors that could be associated with maintenance operations. Under the project, maintenance facilities will be continue to be provided within the proposed aircraft facilities. As with existing conditions, maintenance activities will be provided inside a hangar structure and are not anticipated to produce objectionable odors.

There are no sensitive receptors located adjacent to the project site. The nearest sensitive receptor to the project site is a mobile home park located approximately one quarter mile southeast of the subject site on the eastern side of Woodley Avenue, a major highway. Therefore, potentially objectionable odors associated maintenance activities at the project site will not adversely affect a substantial number of people.

Additionally, per **Table 3: Daily Construction Emissions and Table 4: Operations Emissions**, the project will not result in the exceedance of established SCAQMD thresholds for any of the identified criteria pollutants. The project is proposing to replace existing aviation operations at VNY and will not introduce a new source of air pollution into the project vicinity. Therefore, the project will result in a less than significant air quality impact and will not create objectionable odors that will affect a substantial number of people.