



# South Coast Air Quality Management District

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## **Draft Negative Declaration (Draft ND) for the Van Nuys Airport Propeller Park Development 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 Draft ND, the lead agency proposes construction of approximately 115 box airplane hangars totaling 316,524 square feet, a 24,112 square foot office building and other construction activity on a 30 acre parcel located at the Van Nuys Airport. The lead agency has also noted that residential sensitive receptors are located less than a quarter mile from the proposed project site to the west and south. In addition, Stagg Elementary School is located approximately 1,400 feet to the west of the proposed project site. The AQMD staff is therefore concerned that the lead agency has not evaluated potential health risk effects in the Draft ND resulting from the proposed increase in aircraft and ground support equipment use (such as idling, taxiing, maintenance, etc.) in the part of the airport that is close to the sensitive receptors<sup>1</sup>. This evaluation and the lead agency's determination of significance should be included in the Final ND.

In addition, the lead agency plans to include an above-ground, fixed, 12,000 gallon aviation gas (Avgas) self-service refueling system. Although the lead agency has stated the Avgas refueling system will be properly permitted, AQMD staff recommends that the lead agency include the influence of compliance with AQMD Rule 461 - Gasoline Transfer and Dispensing in the Final Negative Declaration.

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<sup>1</sup> Emission factors for aircraft are available from using the EDMS model available from the FAA at: [http://www.faa.gov/about/office\\_org/headquarters\\_offices/aep/models/edms\\_model](http://www.faa.gov/about/office_org/headquarters_offices/aep/models/edms_model)

EF's for ground support are available from ARB's OFFROAD2007 model available here: <http://www.arb.ca.gov/msei/offroad/offroad.htm>

Please provide the AQMD with written responses to all comments contained herein prior to the adoption of the Final ND. 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,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:MH:GM

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