APPENDIX E-8:
AIR QUALITY MANAGEMENT PLAN

The Village at Playa Vista

Appendix E-8

Air Quality Management Plan

Appendix E-8a

Air Quality Management Plan

AIR QUALITY MANAGEMENT PLAN

FOR

THE VILLAGE AT PLAYA VISTA

A Technical Appendix to the Draft Environmental Impact Report
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AIR QUALITY MANAGEMENT PLAN
FOR THE VILLAGE AT PLAYA VISTA PROJECT

1.0 INTRODUCTION

The purpose of the Village at Playa Vista Air Quality Management Plan (Village AQMP) is to set forth a comprehensive strategic program to address the air quality impacts associated with development of the Proposed Village at Playa Vista Project (Proposed Project). The Village AQMP is intended to enable the environmentally and socially responsible development of the Proposed Project relative to local and regional air quality concerns. The Village AQMP sets out a means to implement the goals and strategies set forth in the regional Air Quality Management Plan (AQMP) as prepared by the South Coast Air Quality Management District. The set of air quality management strategies set forth in the Village AQMP address the air quality impacts identified in the Draft EIR for the Proposed Project.

To assure that the Proposed Project is developed in a responsible fashion with regard to air quality, the following three goals have been identified:

- To pursue development in a manner which minimizes pollutant emissions to the greatest extent feasible.
- To address air pollutant emissions generated by development of the Proposed Project in a comprehensive manner which considers the synergistic and interrelated aspects of development on air emissions.
- To implement air pollution control measures which are readily available in the marketplace and can be utilized in a cost-effective manner, while seeking out and encouraging the development of innovative and effective new technologies.

Achievement of these three goals starts by focusing on the range of air quality improvement strategies which are available for incorporation into a private sector land development project such as the Proposed Project. Control strategies presented within the Village AQMP reflect a two-tier approach. Tier I strategies consist of those measures for which technologies or methodologies currently exist and can be implemented in a cost-effective manner. Tier I strategies will be made part of the initial development of the Proposed Project to the extent possible. Tier II control measures are those for which definite technologies are not yet established. These measures take the form of policy commitments and provide the framework under which future technological advances can be incorporated into the development of the

Proposed Project. The determining factor with regard to classifying a control strategy as Tier I or Tier II is its readiness for implementation.

2.0 REGIONAL ATTAINMENT OF AIR QUALITY STANDARDS

National Ambient Air Quality Standards (NAAQS) have been established by the U.S. Environmental Protection Agency (EPA) for ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than 10 microns in diameter (PM_{10}), and lead. Those pollutants are referred to as criteria pollutants. The NAAQS were amended in July 1997 to include an additional standard for ozone and to adopt a NAAQS for particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In addition to more stringent standards for criteria pollutants, California has established ambient air quality standards (CAAQS) for sulfate and visibility. Although concentrations of all criteria pollutants have decreased substantially over the years, the South Coast Air Basin (Basin) is currently only in compliance with the state and federal standards for sulfur dioxide, nitrogen dioxide and lead. Monitored concentrations of carbon monoxide, ozone and PM_{10} continue to exceed both state and federal standards. Attainment has not been determined for $PM_{2.5}$ although it is likely to exceed both state and federal standards.

3.0 OPPORTUNITIES AND CONSTRAINTS UPON IMPLEMENTATION OF AIR POLLUTANT CONTROL STRATEGIES BY LAND DEVELOPMENT PROJECTS

The AQMP for the South Coast Air Basin as approved by EPA and incorporated into the State Implementation Plan (SIP) demonstrates that the NAAQS can be attained even in the face of substantial future growth within the South Coast Air Basin. Population within Los Angeles County alone is projected to increase from 9.8 million people in 2000 to nearly 10.8 million people in 2010. The control measures of the AQMP account for the projected increase in population and its correspondent increase in air pollution emissions. Since this increment of growth does not preclude attainment of the NAAQS as scheduled, the issue becomes one of how to assure that the growth which does occur, does so in a manner consistent with the assumptions and goals of the AQMP.

Development of the Proposed Project, as described in detail within the Draft EIR includes analyses of emissions due to: (1) construction activities, (2) mobile source activity post development and (3) stationary source operation including consumption of natural gas and the production of electricity post development.

The majority of emissions associated with the Proposed Project result from the burning of fossil fuel in some form. Unable to establish more stringent vehicle emission or fuel standards, a private developer is left with few tools at its disposal in terms of reducing emissions. The developer can, however, through the use of wise planning and design standards make the most of the tools available, to create a project which minimizes air quality impacts. The incorporation of an appropriate mix of uses complementary to the existing and nearby uses can help to reduce the number and length of vehicle trips generated by the Proposed Project. The inclusion of energy efficient buildings emphasizing the use of renewable resources in both passive and active modes can substantially reduce emissions both locally and regionally. The air quality improvement strategies described in the following section, demonstrate a commitment to the AQMP's overall goals and objectives as well as to those applicable control measures that are within the domain of a private sector land development project.

4.0 THE VILLAGE AT PLAYA VISTA AIR QUALITY IMPROVEMENT PLAN EMISSION REDUCTION STRATEGY

4.1 Introduction

The Village at Playa Vista AQMP Strategy is a comprehensive statement of all actions, which address the air pollutant emissions generated by development of the Proposed Project. Emission reduction strategies are categorized into two classifications, Tier I and Tier II, depending on their availability for implementation. Tier I strategies are those which can be incorporated into the initial development of the Proposed Project in a cost-effective manner. Tier II strategies reflect policy commitments which provide the framework under which future technological advances with regard to emission reductions can be incorporated into the proposed development. Tier I and Tier II strategies are identified whenever feasible. The emission reduction strategies outlined below include design features which have been incorporated into the Proposed Project as well as mitigation measures offered in response to the impact assessment detailed in the Draft EIR. The Village at Playa Vista AQMP is organized to address the two major categories of emissions resulting from development of the Proposed Project; construction emissions, and operational emissions, those occurring once the proposed development is occupied. A brief summary of emissions associated with the respective source category is provided prior to the discussion of the individual emission reduction strategies.

4.2 Construction Emissions

4.2.1 Summary of Emission Inventory

Construction of the proposed Village at Playa Vista project and the Project's proposed off-site roadway improvements, would generate pollutant emissions from the following activities: (1) Site preparation operations (grading and related activities); (2) travel by construction workers to and from the site; (3) delivery and hauling of construction materials and supplies to and from the Project site; (4) fuel combustion by on-site construction equipment; and, (5) the application of architectural coatings and other building materials that release reactive organic compounds (ROC). Construction emissions calculated for this Project would exceed SCAQMD daily thresholds established for CO, NO_x and ROC pollutants. Thus, emissions of these pollutants would result in significant short-term regional air quality impacts. Daily emissions of SO_x and PM_{10} are considered adverse, but not significant, since levels of these emissions fall below the SCAQMD significance thresholds.

In addition to emissions generated from fuel combustion from large numbers of diesel powered construction equipment, fugitive dust is also produced from soil disturbance during the grading/site preparation phase of construction. Dispersion modeling was performed to determine the extent of fugitive dust concentrations at nearby sensitive receptors. Results of the PM_{10} dispersion modeling indicate that development of the Proposed Project and the Project's proposed off-site roadway improvements would not cause an exceedance of the 10.4 $\mu g/m^3$ PM_{10} incremental increase significance threshold[1] and, therefore would not result in a significant impact to air quality. While the SCAQMD CEQA Air Quality Handbook does not provide any localized significance thresholds, an analysis of NO_2 and CO impacts was conducted for informational purposes. Results of the analysis indicate that construction-related emissions of NO_2 and CO would not exceed the relevant ambient air quality standards and as a result, a less than significant impact would occur.

4.2.2 Tier I Emission Reduction Strategies

All construction and construction-related contracts should contain the following requirements:

- Prior to issuance of any grading/building permit, an Air Quality Monitor, satisfactory to the Director of Planning, shall be retained by the Applicant to document

[1] *The current SCAQMD CEQA Air Quality Handbook does not include a concentration threshold for localized PM_{10}. However, SCAQMD currently recommends this threshold of significance for analyzing localized PM_{10} impacts. Source: Steve Smith, Ph.D., SCAQMD CEQA Coordinator, personal correspondence, June 7, 2002.*

compliance with the emission control measures summarized herein. During the Project's construction phase, the Monitor shall review all activities occurring on the Project site on a periodic basis and maintain current records on compliance with the Playa Vista AQMP. The Monitor shall submit monthly reports during Project construction, documenting compliance with all air emission control measures contained in the Playa Vista AQMP. The records and reports shall be maintained as public documents. The Monitor's identification, qualifications, address and telephone number shall be listed in the contracts and shall be placed in the pertinent files of the Planning Department.

- The Applicant shall require in all construction and construction-related contracts and subcontracts, provisions requiring compliance with all applicable environmental conditions included in all relevant entitlement approval actions of the City.

- Upon identification of any instance of non-compliance with the Playa Vista AQMP, the Monitor shall within 48 hours notify the Applicant and the designated representative of the Planning Department, or other appropriate enforcement and monitoring agency. All of the Applicant's applicable contracts shall require corrective actions within 48 hours to attain compliance. Once notified of a condition of non-compliance, the Applicant shall promptly act to attempt to attain compliance. In the event that a contractor, subcontractor or operator fails to correct the noticed noncompliance, the Applicant, its representative or prime contractor shall retain the contractual right to effect prompt corrective action. Should remedial action not occur, the Director of Planning, or other enforcement and monitoring agencies, are empowered to issue cease and desist orders.

4.2.2.1 Construction Equipment/Operation

- Control Technologies: Apply NO_x control technologies, such as fuel injection timing retard for diesel engines and air-to-air after cooling, as feasible.

- Low Emission Equipment and Technology: Use low emission fuels and technology, such as LNG, CNG, and advanced low emission diesel technology or at a minimum low sulfur fuel, as feasible.

- Configure construction parking to minimize traffic interference.

- Develop a construction traffic management plan that includes, but is not limited to:

  – Providing temporary traffic control during all phases of construction activities to improve traffic flow on public roadways (e.g., flag person).

  - Scheduling of construction activities that affect traffic flow on public roadways to off-peak hours to the extent feasible.
  - Rerouting construction trucks off congested streets.
  - Consolidating truck deliveries.
  - Providing dedicated turn lanes for movement of construction trucks and equipment on- and off-site.
  - Prohibit truck idling in excess of two minutes whenever practical.

- Where possible use electricity from power lines rather than temporary generators.
- Construction Practices: Use only well maintained equipment, utilize proper planning to reduce rework and multiple handling of earth materials, select equipment that is properly sized to minimize trips/use, consolidate deliveries, and maximize off-site construction (i.e. prefabricating and prepainting).
- Record Keeping: Log fuel use, hours of operation and periodic maintenance of all construction equipment to ensure proper maintenance.
- Use ULEV or ZEV or other low emission support vehicles and equipment, including fleet vehicles if any, to the extent cost effective and feasible.

4.2.2.2 Fugitive Dust

- For disturbed dirt areas which remain inactive over an extended period of time, soil stabilization measures shall be undertaken such as application of moisture retaining binders which pull moisture out of the air to form a cohesive soil binder.
- Replace ground cover in disturbed areas as quickly as possible.
- During dry weather, enclose, cover, water twice daily or apply non-toxic soil binders according to manufacturers' specifications, to exposed piles (i.e., gravel, sand, dirt) with 5% or greater silt content.
- Water active grading/construction sites at least twice daily, or as needed during wet weather.
- Suspend all excavating and grading operations when wind speeds (as instantaneous gusts) exceed 25 mph.

- All trucks hauling dirt, sand, soil, or other loose materials off-site shall be covered or should maintain at least two feet of freeboard (i.e., minimum vertical distance between top of the load and the top of the trailer) in accordance with the requirements of CVC Section 23114.

- Sweep streets at the end of the day if visible soil material is carried onto adjacent public paved roads. Water sweepers shall use reclaimed water, where available.

- Apply water up to three times daily, or as necessary, to all unpaved parking or staging areas or unpaved road surfaces, during dry weather.

- Limit traffic speeds on all unpaved roads to 25 mph or less.

- Pave or apply chemical stabilization at sufficient concentration and frequency to maintain a stabilized surface starting from the point of intersection with the public paved surface, and extending for a centerline distance of at least 100 feet and a width of at least 20 feet.

- Other Dust Controls: Any intensive dust generating activity, such as abrasive blasting, drilling, and grinding must be controlled to the greatest extent feasible. Such control would necessarily be specific to the activity, but could include the use of screens or enclosures, water sprays or collection devices.

- Comply with the requirements of AQMD Rule 403 to the extent not provided above.

4.2.2.3 Construction Worker Travel

- All contractors shall be required to participate in a common carpool registry which provides a list of construction workers willing to carpool during all periods of contract performance. This registry shall be maintained by the Applicant and reviewed by the Monitor.

4.2.2.4 Building Materials and Architectural Coatings

- Building materials, architectural coatings and cleaning solvents used must comply with all applicable SCAQMD rules and regulations.

4.2.3 Tier II Emission Reduction Strategies

The Applicant or its successor shall, on a yearly basis until Project buildout, identify emerging technologies which may yield emission reductions. Such consideration shall include

analysis of the feasibility of new emission reduction measures recommended in updates of the SCAQMD's CEQA Air Quality Handbook.

The Applicant or its successor shall assess feasibility of implementing such measures based on the following:

- The ability of the measure to reduce air pollutant emissions which result from Project construction operations.
- The new measure or product is equivalent in cost to the standard strategies, measures or products;
- The availability of the measure or product prior to the time required for implementation;
- The reasonable reliability and reasonably equivalent durability of the new measure or product to standard measures and products;
- The absence of significant adverse impacts to other areas of the environment (e.g. noise, water, aesthetics); and
- The consistency of the new measure with the Project's design concepts and objectives.

The Air Quality Monitor shall determine the feasibility of all new recommended measures, technologies or products identified by the Applicant.

Recommendations which are determined to be feasible and appropriate pursuant to the standards set forth above shall be incorporated by the Applicant into all future contracts for construction activities at the Proposed Project.

The Monitor shall also be responsible for providing the Director of Planning with documentation regarding compliance with this provision.

All associated reports and documentation (including feasibility assessment of new emission reduction measures, the Air Quality Monitor's feasibility determination and the Applicant's compliance with the feasible new emission reduction measures and technologies) shall be included in an annual monitoring report to the enforcement and monitoring agencies and kept open for public inspection. Said reports, documentations and the Monitor's identification, qualifications, address and telephone number shall be placed in the pertinent files of the Planning Department.

Implementation of new mitigation measures/products and strategies would not affect contracts and commitments entered into prior to the date the new mitigation measures/products and strategies meet the above standards. However, contractors shall be informed/advised of the available new emission reduction measures and technologies.

4.3 Operational Emissions

4.3.1 Summary of Emission Inventory

Air pollutant emissions associated with Project occupancy and operation would be generated by both consumption of electricity and natural gas and by the operation of on-road vehicles and by miscellaneous area sources (among other things, landscaping equipment, consumer/commercial solvent usage, architectural and automotive coatings, restaurant charbroilers, and emergency generators). Emissions associated with energy production (electricity and natural gas) are classified by the SCAQMD as regional stationary source emissions. With the exception of sulfur oxides, Project-related operational emissions for on-road mobile sources, and stationary sources would exceed SCAQMD thresholds for operational emissions and would represent a significant impact to air quality.

During the operational phase of the Project, Project traffic would have the potential for local area impacts. An analysis at selected intersections was performed to determine the potential for the presence or the creation of CO hot spots attributable to the Proposed Project. A total of 16 intersections were modeled to assess the potential for CO hotspot formation during both the weekday A.M. and P.M. peak traffic period. Based on these analyses, Project-related traffic is not anticipated to result in any exceedances of the state 1-hour CO standards at any of the study intersections. Similarly, eight-hour concentrations at the analyzed intersections would remain below the state standards.

4.3.2 Tier I Emission Reduction Strategies

4.3.2.1 Service and Support Facilities (point sources)

All point source facilities shall obtain all required permits from the SCAQMD. The issuance of these permits by the SCAQMD will require the operators of these facilities to implement Best Available Control Technology (BACT) and other required measures that reduce emissions of criteria air pollutants.

4.3.2.2 Natural Gas Consumption and Electricity Production

Adherence to the following energy consumption measures shall be made an element of the Playa Vista AQMP if deemed acceptable to the Building and Safety Department.

- All residential buildings shall be equipped with Energy-Star rated appliances, to the extent feasible.

- All residential and non-residential buildings shall exceed the California Title 24 Energy Efficiency standards for water heating, space heating and cooling, to the extent feasible.

- Energy efficient light fixtures, which exceed the California Title 24 Energy Efficiency standards to the extent feasible, shall be installed to satisfy interior lighting requirements within all buildings. Automatic devices to turn off lights when they are not needed shall also be used to regulate lighting for interior office common spaces, such as conference rooms and bathrooms.

- All fixtures used for lighting of exterior common areas shall be regulated by automatic devices to turn off lights when they are not needed. Exterior lighting fixtures as might be specified by the Department of Water and Power as energy efficient shall be used to the extent such lighting is available and architecturally acceptable.

- All residential and commercial buildings shall be equipped with electric vehicle charging stations to the extent required by the California ARB at the time of construction of the given building.

- Shade producing trees shall be planted at the Proposed Project site to the extent feasible to provide localized as well as overall community cooling.

- All buildings shall employ passive heating and cooling design strategies to the extent feasible.

- All buildings shall be designed to accommodate renewable energy sources to the extent feasible.

4.3.2.3 Building Materials and Architectural Coatings

Building materials, architectural coatings and cleaning solvents shall comply with all applicable SCAQMD rules and regulations.

4.3.2.4 Mobile Sources

A primary objective in the design of the Proposed Project is to create a development which minimizes the necessary number of vehicle trips as well as vehicle miles traveled. This design program incorporated into the Proposed Project, to minimize pollutant emissions, consists of providing an organized well balanced mix of uses, facilitating and promoting alternative travel modes, and establishing clean fuel fleet vehicles.

4.3.2.4.1 Land Use Plan

The land use plan for the Proposed Project promotes reductions in vehicle trips and the consequent generation of pollutant emissions in the following ways: (a) developing residential mixed-use neighborhoods; (b) scaling commercial uses to serve neighborhood and community needs; (c) siting office uses near residences and public transit; (d) providing basic services within office areas; (e) providing jobs/housing linkages; and (f) including a variety of civic uses such as community centers and public recreational facilities.

Mixed Use Development. The land use plan for the Village at Playa Vista was developed seeking to create a community which provides a wide range of opportunities to meet the needs of all those within the community by providing a balanced mix of residential, commercial, and community serving land uses. The Village at Playa Vista Project is proposed to be developed as a series of mixed use neighborhoods; i.e. neighborhoods containing residential, commercial, and community serving uses. This approach to providing mixed-use neighborhoods minimizes on and off-site vehicle use by providing a variety of daily needs within a short walk from any residence or business.

Retail Uses Scaled to Serve the Community. The retail uses that are proposed are designed primarily to service Project residents and employees as well as those occupying the adjacent Playa Vista First Phase Project. By orienting the retail uses to Project and nearby patrons, and by making these uses accessible to pedestrians and the internal shuttle system (see description below), a reduction in vehicle trips and vehicle miles traveled would be realized.

Location of Office Uses. The placement of the office uses in the design of the Village at Playa Vista serves the objective of minimizing mobile source pollutant emissions. Office uses that would be developed within the Proposed Project would be located close proximity to access ramps of the San Diego (I-405) and Marina (SR-90) Freeways. Such concentration and placement are intended to reduce vehicle miles traveled within the Project site and within the region and subregion by reducing commute distances for non-resident workers. The provision of office space in close proximity to residential neighborhoods increases the probability that residents may work nearer to their home, thus reducing the vehicle miles traveled.

Commercial Retail Uses Near Office Uses. Similar to the strategy to provide basic services within each residential neighborhood, the office uses would be in proximity to commercial and retail space to encourage the provision of basic services such as banking, child care, food and postal services within a short walk from the work-site.

Civic Facilities. A broad spectrum of civic facilities is proposed within the site, and in close proximity of on-site residents and businesses. This spatial relationship would also in turn sever to reduce vehicular trips and miles traveled.

Jobs Housing Linkage. The proposed array of residential, retail, and office uses would, in itself, promote a reduction of mobile source emissions by providing a large supply of housing and employment in proximity to one another which makes it possible for an individual to both reside and work within the Proposed Project or the adjacent Playa Vista First Phase Project (jobs/housing linkage). In addition, the Project would provide a substantial amount of housing in a jobs-rich subregion. (See Section IV-J., Population, Housing and Employment, for additional information regarding the jobs/housing issue.).

4.3.2.4.2 Promotion of Alternative Travel Modes

The design of the Proposed Project facilitates reductions in pollutant emissions via the arrangement of proposed land uses, as described above, as well as through the promotion of alternative modes of travel such as mass transit, bicycling, and walking.

Internal Shuttle System. To support opportunities for residents to live and work in the area and to encourage the use of the community facilities (i.e. parks and services), as well as to promote overall community interaction, the Proposed Project addresses the mass transit issue by proposing an Internal Shuttle System. The system is intended to provide a safe and reliable transportation alternative to the single occupancy vehicle for Project residents, employees and visitors. Vehicles used within the Internal Shuttle System would be low emission vehicles, although the specific fuel/power source has not yet been determined. The Internal Shuttle System would provide stop points throughout the Project area. It is intended that access to the Internal Shuttle System would only be a short walk from any residential, office or other location. In addition, an Expanded Shuttle System would be available that provides enhanced transit service for Project residents, visitors, employees, and the surrounding community, providing connections to key destinations such as Marina del Rey, Howard Hughes Center, the adjacent Playa Vista First Phase Project, and the Fox Hills Mall. Connections to regional transit service shall be provided at Lincoln Boulevard/Jefferson Boulevard and Fox Hills Mall Transit Center. The Internal Shuttle System that would carry residents and workers within the Proposed Project site would support opportunities for jobs/housing linkage, accessing community facilities (e.g., child care facilities, parks and services), as well as overall community interaction. The system is intended to provide a safe and reliable transportation alternative to the automobile for Project

residents. Information accessible via computers would be available to all Proposed Project residents and workers, as well as those associated with the adjacent Playa Vista First Phase Project, on the operation and location of the internal shuttle. In addition, the system would be operated as a fare-free service for Project residents and employees at all times and for visitors not residing or working on the Project site during peak hours (8:00 to 9:00 A.M. and 5:00 to 6:00 P.M.).

Bicycle Use Promotions. Considerations which promote bicycle usage as a means of reducing pollutant emissions have also been incorporated into the Proposed Project. To promote bicycle usage a network of interconnected bikeway routes which provide access throughout the Project site that also connects to the bikeway system incorporated into the adjacent Playa Vista First Phase Project site and connect to and expand on the regional bicycle system is proposed. The bikeway routes were designed to link major activity centers within the Project area to provide an alternative means of transportation to the automobile. To further encourage bicycle use as an alternative to single occupancy vehicle use, bicycle racks would be provided in public areas (e.g., parks, community facilities, etc.) and in the Village retail area, and bicycle storage areas would be provided within the residential buildings.

Pedestrian Walkways. Convenient and extensive pedestrian facilities and amenities (e.g., benches/seating, water fountains, trash bins with plastic bags to collect dog waste, etc.) would be provided to further encourage the use of this alternative travel mode. In addition to a well-defined sidewalk network along all residential local, collector and arterial streets within the Proposed Project site, pedestrian paths would be provided at appropriate locations to connect with cross-walks at intersections and other key destinations within the site. The pedestrian facilities are being designed to meet all applicable safety standards.

Recreation and Open Space. To address the recreational and open space needs of future residents while promoting pedestrian activity, the Proposed Project has been designed to provide a neighborhood park within a short walk of every residence. Residential recreational needs which reduce vehicle trips are also addressed through the provision of hard-surface play areas for children to be located in most residential blocks.

4.3.2.5 Public Information Program

The Applicant or successor shall circulate a semi-annual or more frequent newsletter to all on-site residents, businesses and employees to provide information on carpool incentives, Internal Shuttle System routes and schedules, on-site housing and job opportunities for on-site

employees and residents, and mandatory or voluntary new technologies for air pollution reduction in businesses and homes.

4.3.3 Tier II Emission Reduction Strategies

4.3.3.1 Implementation of New Technology

The Applicant or its successor shall, on a yearly basis until Project buildout, identify emerging technologies which may yield emission reductions. Such consideration shall include analysis of the feasibility of new emission reduction measures recommended in updates of the SCAQMD's CEQA Air Quality Handbook.

The Applicant or its successor shall assess the feasibility of implementing such measures based on the following:

- The ability of the measure to reduce air pollutant emissions which result from Project operations;
- The new measure or product is equivalent in cost to the standard strategies, measures or products;
- The availability of the new measure or product prior to the time required for implementation;
- The reasonable reliability and reasonably equivalent durability of the new measure or product to standard measures and products;
- The absence of significant adverse impacts to other areas of the environment (e.g. noise, water, aesthetics); and
- The consistency of the new measure with the Project's design concepts and objectives.

The Air Quality Monitor shall determine the feasibility of all new recommended technologies or products identified by the Applicant.

Recommendations which are determined to be feasible and appropriate pursuant to the standards set forth above shall be incorporated by the Applicant into all future development at the Proposed Project.

The Monitor shall also be responsible for providing the Director of Planning with documentation regarding compliance with this provision.

All associated reports and documentation (including feasibility assessment of new emission reduction measures, the Air Quality Monitor's feasibility determination and the Applicant's compliance with the feasible new emission reduction measures and technologies) shall be included in an annual monitoring report to the enforcement and monitoring agencies and kept open for public inspection. Said reports, documentations and monitor's identifications, qualifications, address and telephone number shall be placed in the pertinent files of the City Planning Department.

Implementation of new mitigation measures or products would not affect contracts and commitments entered into prior to the date the new mitigation measures/products and strategies meet the above standards. However, contractors shall be informed/advised of the available new emission reduction measures and technologies.

4.4 Conclusion

The emission inventory developed for the Proposed Project indicates that mobile sources constitute the single largest pollutant emission source category. The Applicant has therefore, incorporated all feasible air quality emission reduction measures into the design and planning process. This effort is evident from the detailed description provided above of the large number of project design features which seek to achieve trip reduction as well as reductions in overall vehicle miles traveled. As technological advances in emission reduction from mobile sources are achieved, and incorporated into future development the emission inventory, identified within the Draft EIR and summarized above, would be reduced. The development program for the Proposed Project described in the Village AQMP has incorporated all currently available stationary and mobile source emission reduction control technologies which can be implemented in a cost-effective fashion within the context of a private sector land development project.