



**US Army Corps
of Engineers.**
Los Angeles District

**LOS ANGELES COUNTY DRAINAGE AREA
HANSEN DAM RESERVOIR**

AMERICAN HEROES AIRSHOW AND FESTIVAL

Environmental Assessment

and

Finding of No Significant Impact

**Prepared by
US Army Corps of Engineers
Los Angeles District
915 Wilshire Blvd.
Los Angeles, California 90017-3401**

**With Technical Assistance by
City of Los Angeles Department of Recreation and Parks**

September 2019

U.S. ARMY CORPS OF ENGINEERS

**LOS ANGELES DISTRICT
DRAFT FINDING OF NO SIGNIFICANT IMPACT**

**American Heroes Air Show
Hansen Dam Flood Control Reservoir
Los Angeles County, California**

I have reviewed the attached Environmental Assessment (EA) which was prepared pursuant to the National Environmental Policy Act (NEPA, 42 USC 4321, et seq.) to describe and analyze effects of the U.S. Army Corps of Engineers (Corps) approval for the City of Los Angeles Department of Recreation and Parks (RAP) proposal to permit use of Hansen Dam Reservoir for a special event celebrating “American Heroes”. The proposed event would be comprised of an airshow and festival, and would include public speakers, a static display of helicopters, military equipment and rescue equipment, arts, crafts, vendor booths, a helicopter flyover and paid helicopter rides, and other activities at Hansen Dam Reservoir, Los Angeles County, California.

Hansen Dam Reservoir is owned by the Federal government and operated and managed by the Corps. The City is the master recreation lessee and manages the leased area through its Department of Recreation and Parks. The City routinely permits special events at specific locations within Hansen Dam Reservoir, including the Hansen Dam Sports Center. The City proposes to issue a Special Event permit to the organizer of American Heroes Airshow and Festival (event organizer) for an all-day event to be held November 9, 2019. As in past years, approximately 3,000 people are expected to attend the Airshow and Festival.

The EA evaluates potential environmental impacts of the proposal and determine whether approval of the City’s proposal to permit the American Heroes Airshow and Festival. The No-Action Alternative was also evaluated in the EA. The Draft Finding of No Significant Impact and the EA were made available on the Corps’ website for 15 days, from September 27, 2019 to October 11, 2019.

Approximately 15 helicopters would participate in the static display, with a concession for helicopter rides, as described in the EA. A Safety Plan has been provided (Appendix A to the EA) and coordinated by the event organizer with the Federal Aviation Administration. The special event area will be open to the public but some activities generally conducted in the area when such an event is not taking place, including picnicking and general park use, would be temporarily displaced on November 9, 2019. However, all other areas in the Reservoir would remain open to the public. The City has communicated to the event organizer that all other Reservoir areas must remain accessible. The Hansen Dam Sports Center area would quickly return to public access, and all clean-up would be required to be completed by 5:00 p.m. on November 10, 2019. The City has communicated neighbors’ concerns with past similar events to the event organizer and the City’s noise ordinance will be enforced. The Airshow and Festival will increase traffic in the Reservoir beyond what is usual for the Sports Center area during non-events, estimated at approximately 1,500 additional vehicles. To address traffic and parking concerns, the City will require the event organizer to provide a parking plan coordinated with the City of Los Angeles Department of Transportation. This plan would provide guidance to insure

incoming traffic does not back up onto adjacent surface streets. Handicapped parking would be provided in compliance with the Americans with Disabilities Act. The City has also required trash management and other commitments from the event organizer. The event would be in compliance with the Clean Air Act. The proposed event would result in any impacts to special status species pursuant to the Endangered Species Act. Approval and implementation of the event has no potential to affect historic properties under the National Historic Preservation Act.

Although no significant impacts were identified, best management practices have been identified that would further minimize any impacts associated with the proposed action. The proposal does not contribute significantly to cumulative impacts.

The EA is written in compliance with the National Environmental Policy Act, 42 U.S.C. § 4321, et seq., and all applicable environmental laws and regulations. Consideration of all the significant factors and all pertinent environmental legislation, in addition to comments and coordination with concerned agencies as discussed in the EA, indicate that the proposed action would not significantly affect the quality of the human environment nor would there be significant environmental effects. Therefore, an Environmental Impact Statement will not be required, pursuant to 33 C.F.R. § 230.11.

Date

Aaron C. Barta, PMP
Colonel, U.S. Army
Commander and District Engineer

1 INTRODUCTION

1.1 Authority

The U.S. Army Corps of Engineers (Corps) is in receipt of a request by the City of Los Angeles Department of Recreation and Parks (RAP), the recreational lessee at Hansen Dam Reservoir, for a proposed special event entitled American Heroes Airshow and Festival (Airshow) is proposed to be held November 9, 2019. This Airshow is referred to as the Proposed Project.

The Hansen Dam (Dam) is a federally authorized flood risk management project constructed, operated, and maintained by the Corps, Los Angeles District with a primary purpose to provide flood risk management for the residents of Los Angeles County residing downstream of the Dam.

The Flood Control Act (FCA) of 1936 (Public Law [PL] 74-738) authorized civil works projects for flood risk management to reduce flood risk for Los Angeles County, California. The FCA of 1938 authorized acquisition of land for flood control projects for the Los Angeles County Drainage Area (LACDA), including Hansen Dam. Section 4 of the FCA of 1944, (PL 78-534), as amended, authorize the Corps to construct, maintain, and operate public park and recreation amenities at water resource development projects, to permit the construction of such facilities by local interests (particularly those to be operated and maintained by such interests), and to permit the maintenance and operation of such facilities by local interests.

Pursuant to 36 Code of Federal Regulations (CFR) Section 327.21, the Corps is authorized to approve special events at its water resources development projects. Under this authority, special events at Corps projects are prohibited unless written permission has been granted by the District Commander. Consistent with the CFR and RAP's lease, the public shall not be charged any fee by the sponsor of such event unless the District Commander has approved in writing (and the sponsor has properly posted) the proposed schedule of fees. The District Commander has authority to revoke permission, require removal of any equipment, and require restoration of an area to pre-event condition, upon failure of the sponsor to comply with terms and conditions of the permission or these regulations. RAP has requested such permission from the District Commander for this special event.

In addition to evaluating whether to provide approval for the special event pursuant to 36 CFR §327.21, the Corps must also evaluate whether to waive certain requirements of its policy as presented in Appendix A:5 of the Basin Master Plan: Corps Policy on Special Events at Hansen Dam Reservoir (Special Events Policy). When a proposed event does not comply with conditions of the Master Plan, the Corps may consider a waiver.

The Corps has prepared this Environmental Assessment (EA) to evaluate the potential impacts of approving the event as proposed by RAP and granting the waiver to the Special Events Policy which is described here as the Proponent's Preferred Alternative, along with the No Action Alternative. This EA has been prepared pursuant to the National Environmental Policy Act (NEPA) (42 USC 4321 et seq.), Council on Environmental Quality (CEQ) regulations published at 40 Code of Federal Regulations (CFR) Part 1500 et seq., the Corps' *Procedures for Implementing NEPA* Engineer Regulation 200-2-2, (33 CFR Part 230), other environmental laws, Executive Orders, and Corps regulations and policies.

1.2 Proposed Project Site

The Project is comprised of a Dam and lands that support the construction, operations and maintenance of the Dam. It is located in Los Angeles County at the confluence of the Big and Little Tujunga Washes along the northeastern edge of the San Fernando Valley. The Reservoir lies entirely in the City of Los Angeles, and is approximately 17 miles northwest of downtown Los Angeles. Foothill Boulevard marks the northern extent, while Glenoaks Boulevard and Montague Street mark the southern boundary of the Reservoir. The Reservoir extends beyond Osborne Street to the west and follows Wentworth Street along the east extent.

The Hansen Sports Center is a developed facility comprised of approximately 30 acres including parking, turfied picnic and soccer field areas, and softball diamonds. This location was designed to be RAP's choice location for its larger public events. RAP makes Sports Center facilities available for scheduled activities during most of the year and reserves the area for its less common large events such as Independence Day Celebration and other, non-routine activities.

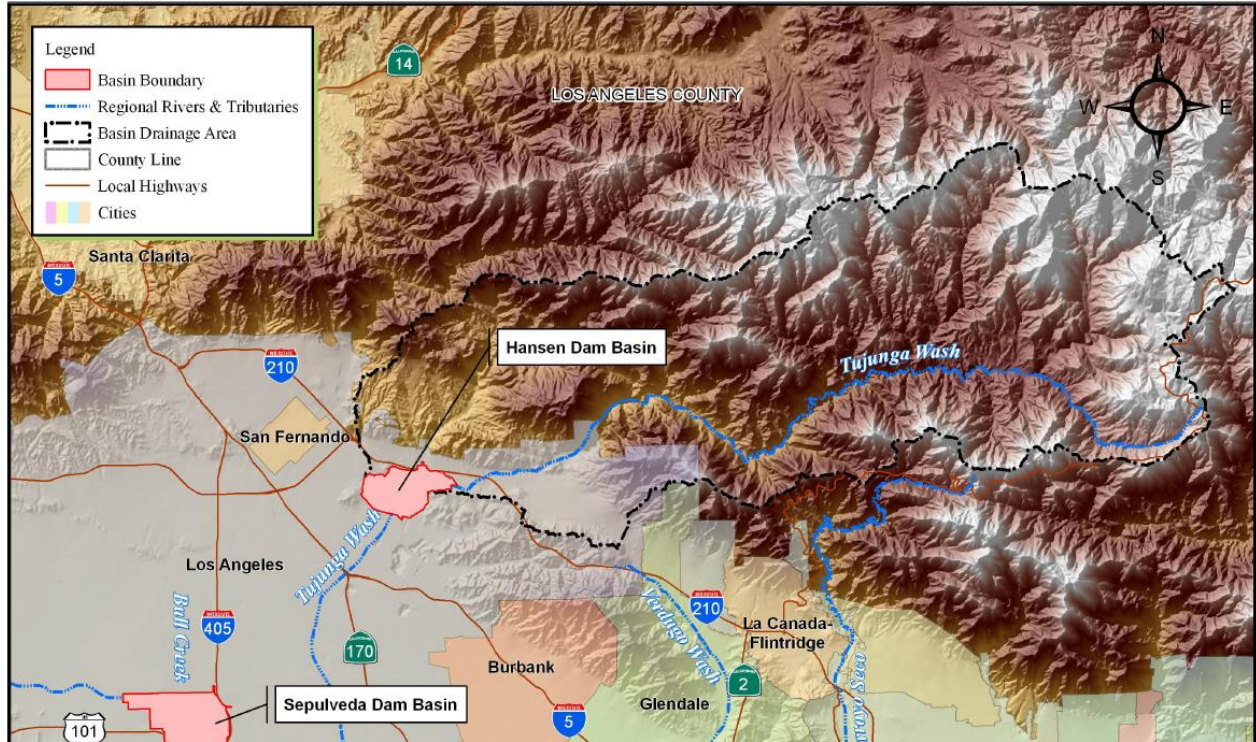
1.3 Proposed Project Overview

The Corps has received a request from the City of Los Angeles RAP, to hold a special event at the Reservoir. As proposed, the Proponent's Preferred Alternative is described as the American Heroes Airshow and Festival, a daylong admission-free event proposed for Saturday, November 9, 2019. The proposed event is expected to have approximately 3,000 persons in attendance, featuring a static display of helicopters, military vehicles and civilian rescue equipment. Additional activities related to public safety would be provided including displays, flying helicopter demonstrations, and a job fair booth with recruiting information for parties interested in related work.

Set up and break down of the event is proposed for eight (8) days before and four (4) days after the event for a total of 15 days during which the northeast portion of the Reservoir would be affected. Woodley Park I would be closed to the public for a maximum of 15 days to ensure a safe and secure load in/load out space for the set up and tear down of the Concert. The golf course would be only partially shut down in the afternoon on event days only to accommodate parking. Other parking areas would also be needed, but only in the afternoon on event days.

1.4 Project Purpose and Need

The Corps has received a request from the City of Los Angeles RAP, the recreation lessee at Hansen Dam Reservoir, to hold the American Heroes Airshow and Festival in the Reservoir. The proposed event does not comply with several conditions of the Corps' Policy on Special Events at the Hansen Dam Reservoir and as such, the Corps has been asked for a waiver of the conflicting conditions of the Special Events Policy. Since the primary purpose of the Reservoir is to provide flood risk management for the residents of Los Angeles County residing downstream of Hansen Dam, the Corps will review the Proponent's request in light of the Reservoir's primary flood risk management purpose and applicable Federal laws, Corps' regulations, and policies in assessing whether the proposed event is a compatible use with Corps operations and land use guidelines/policies and whether it is in the public interest.



1.5 RAP's Project Objectives

The RAP has identified the following objectives for the special event:

- The Hansen Sports Center provides sufficient open space for the event involving the landing and take-off of Airshow helicopters.
- Location on a public park managed by the City of Los Angeles RAP.
- Minimize disruption to regular users of a City public park.
- Regional accessibility with access to multiple major freeways.
- Accessibility to majority of parking areas requiring a walking distance less than 1 mile.
- Topographic requirement of continuous flat area of grass with minimal sight line obstructions.
- A site large enough to accommodate approximately 3,000 people as well as the Airshow and Festival amenities.
- Site with sufficient buffer to minimize impacts to surrounding communities

1.6 Scope of Analysis

This EA analyzes potential effects of the proposal by comparing a No Action Alternative, with the Proposed Action which would provide approval to the City to permit the special event, the American Heroes Airshow and Festival, proposed to be held November 9, 2019 and to waive particular sections of the Special Events Policy.

1.7 Request for Public Comments

The Draft FONSI and Environmental Assessment requesting public comment for the proposed event was posted on the Corps website from October 5, 2019 to October 11, 2019.

2.0 ALTERNATIVES

NEPA requires that Federal agencies rigorously explore and objectively evaluate all reasonable alternatives to a proposal. The purpose in analyzing alternatives is to show whether there may be different, possibly superior way(s), to meet the project purpose and need and project objectives as described above. This EA also evaluates the No Action Alternative as required by NEPA and provides a description and discussion of alternatives that were considered and eliminated from further analysis.

1.1 No Action

The No Action Alternative is the most likely condition expected to exist in the future in the absence of any developed alternative, including known changes in law or public policy. Under the No Action Alternative, the Corps would not provide its approval to RAP under the terms of the lease to grant permission for the American Heroes Airshow and Festival to occur in any form. The Proponent has indicated that were permission for the event to be denied, the American Heroes Airshow and Festival would not occur in a different location. The existing recreation area would continue to serve park patrons and hold special events at a capacity similar to current conditions. There are no changes to current environmental conditions associated with the No Action Alternative.

2.2 Offsite

No offsite locations were identified that meet the objectives of RAP. This is the area the City uses for its largest events, and is equipped with parking and restroom facilities for such events.

2.3 Proposed Action

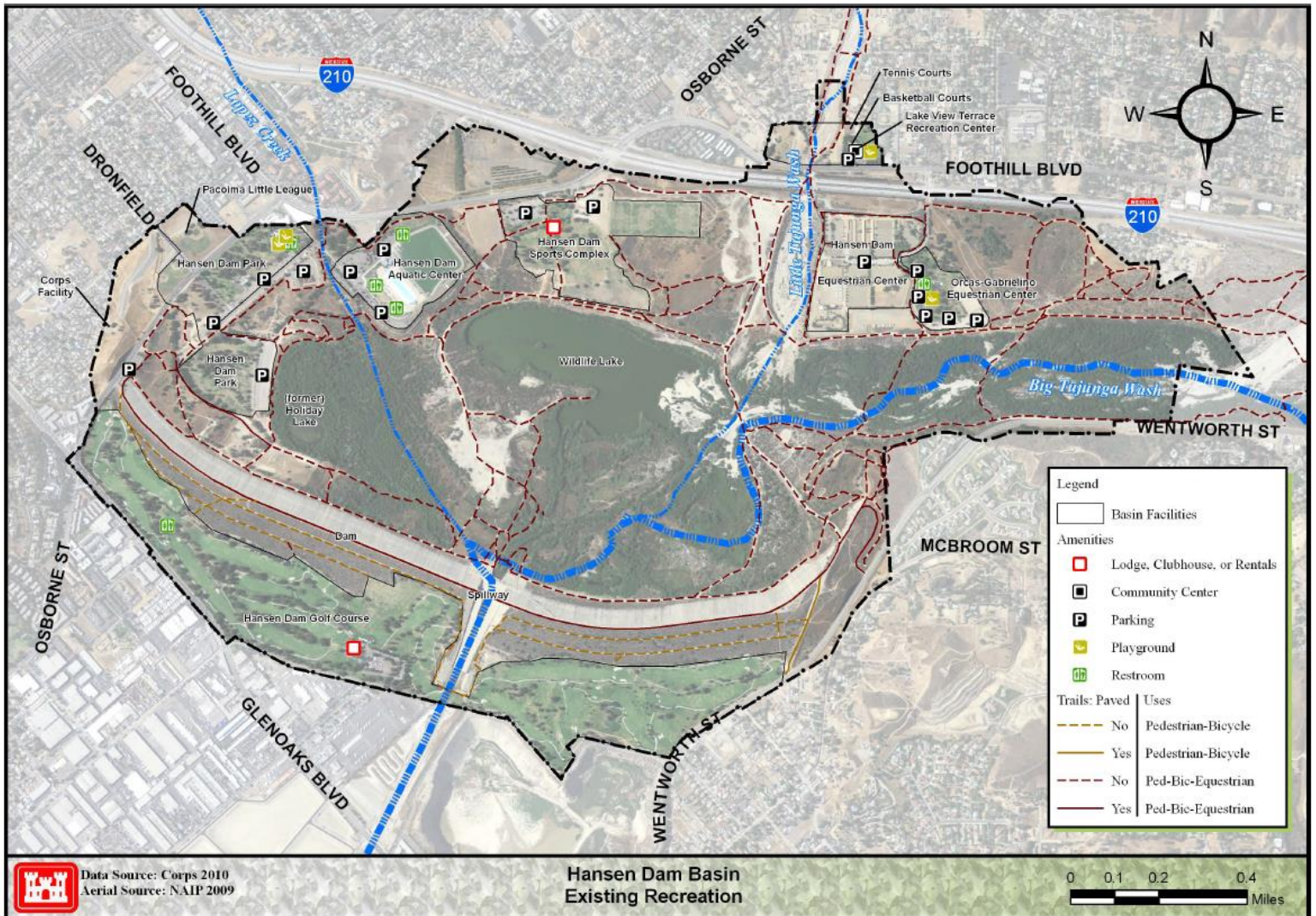
The Corps proposes to grant approval for a one-day special event, the American Heroes Airshow and Festival at Hansen Dam Sports Center, in accordance with the lease to RAP. RAP has requested to hold a one-day event expecting approximately 3,000 people and approximately 1,500 cars. Approximately 15 helicopters would participate in the static display.

Admission and parking would both be free for this event. Food vendors would provide the only sales taking place at this event, in addition to several community information booths.

Other associated events or activities include opportunities for individuals of the public to take a ride in a short helicopter round-trip, viewing of a red-white-and-blue water drop, and viewing of a Los Angeles County Sheriff's Department hoist rescue demonstration and parachute team performances. The helicopter ride concession would cost approximately \$45-\$55, based on current fuel costs and would avoid fly-over of sensitive environmental or populated areas. Los Angeles Police Cadets and Civil Air Patrol would assist in traffic and parking.

A number of non-static rescue and/or fire helicopters are scheduled to arrive, land, be on display, and then depart, as a part of this event, and a helicopter airdrop of colored water would be part of the event. Appendix A contains the event's *Safety and Emergency Response Plan*. All active

landings, departures and other helicopter activities would occur with steep approach or descent from an altitude greater than 500 feet above the surface of the Hansen Reservoir lake ('Borrow pit Lake') in order to minimize noise and exhaust impacts on ground areas within Hansen Recreation Area. All permits for vehicles and for aircraft (including flight plan approval from Federal Aviation Agency/FAA) would be obtained prior to the event.



3.0 Environmental Analysis

3.1 Geology and Soils

The Airshow and Festival would be held in the Hansen Sports Center area of the Reservoir. The Sports Center consists of ball fields which are maintained turf areas. There is no ground disturbance proposed for the event.

There would be no effect to Geology and Soils under the Proposed Action or the No Action Alternative.

3.2 Water Resources

Water resources are not present at the Hansen Dam Sports Center, where this event is to be held. There are no surface or groundwater resources present at this location.

This event will not be held at any body of water. A helicopter flying 500 feet above the Reservoir will perform a red, white, and blue colored-water drop. The water's colors comes from two commercially available and biodegradable food color dyes. There would be no changes to any water-based regimes or recharge, or to ambient water quality standards. No impacts to water resources are anticipated under the Proposed Action or the No Action Alternative. Proposed activities associated with the American Heroes Airshow and Festival would not require analysis or permitting under section 404 of the Clean Water Act.

3.3 Air Quality

The site is located near a highly urbanized area, adjacent to public commuting and transportation corridors such as the 210 Freeway and Foothill Boulevard.

Public use of the park, which is open 365 days per year, generates vehicle trips that contribute to air quality considerations. Differing seasonal conditions, in combination with commuting patterns, produce differing results of air quality conditions. The City is cognizant of air quality emissions being produced and encourages the use of public transportation.

The proposal would generate increased vehicle trips over what would be present in Reservoir on non-event weekend. The event site has parking for approximately 5,000 vehicles, but only 3,000 attendees in 1,500 vehicles are anticipated. There would also be emissions from helicopters. The pollutants or particulates produced because of this event would be minimal, and would be the norm for this sized event. Air quality impacts would be within Federal *de minimis* levels and below regional significance. Details are provided in Appendix B.

3.4. Biological Resources

The site is composed of turf with no rare or protected vegetation types on site. The Hansen Dam Sports Center is generally utilized for regular recreational activities, such as soccer, baseball, and

softball games. Good-quality wildlife habitat occurs nearby, but not in an area to be used in conjunction with this event. Sensitive vegetative communities will not be affected or altered.

Wildlife and birds are not known to forage or nest within the Sports Center. Many areas used by wildlife, including a lake with fish are adjacent to the Sports Center, but those areas will not be used nor inhabited in conjunction with this event. No wildlife or plant species protected by the Endangered Species Act (ESA) occur within the proposed event's area of activity. Elsewhere within the Reservoir riparian areas that could support federally listed species such as the endangered least Bell's vireo, and threatened California gnatcatcher. The threatened Santa Ana sucker has been observed in Big Tujunga Wash, which enters the Hansen Dam Reservoir from the east.

Additional disturbance from noise, the presence of people, and helicopters from the event are not expected to have effects on listed species. The event would occur outside of the avian nesting season. Per section 7 of the ESA, the Corps has determined that the proposed event and attendant activities would have "no effect" on listed species. No significant impact is expected to biological resource from the Proposed Action or the No Action Alternative.

3.5 Cultural Resources

No historical, archaeological, or cultural resources are known to exist at this event site. The turfed park area of the Sports Center is the only area that would be used for this event.

Ground-disturbing activities are not anticipated for the Proposed Action nor the No Action Alternative.

3.6 Aesthetics

The area is not at a prominent topographic feature, and the proposed event is to be held within the confines of the Hansen Dam Sports Center. Any aesthetic changes would be very short-term (one day) and minor.

Neither the Proposed Action nor the No Action Alternative would result in impacts to aesthetics.

3.7 Recreation

The Sports Center location is used throughout the year for a variety of low- and higher-density events. Nearby areas adjacent to the Sports Center and further away within the Reservoir are used for recreation. Much of the Reservoir is natural with trails throughout the area for walking and hiking. Trails are also used for horseback riding. The rest of Hansen Reservoir will remain open to the public during this one-day event.

The Proposed Action would have minimal impacts on recreation use of the Sports Center as the event would be limited to one-day. Neither the Proposed Action nor the No Action Alternative would result in impacts to recreation areas outside the Sports Center.

3.8 Human Health and Safety

Hansen Dam Recreation area is a major recreation area with health and safety considerations normally associated with a park. The City provides a framework to manage safety for events that it holds at Hansen Dam Reservoir. The event, like all large special public events hosted by L.A. City at the site, would be overseen by the LA Fire Dept. (Fire Station #88) and by LA Police Department staff (Foothill Division). A City monitor would also be present for general coordination and park management during the special event.

The event would be occurring within a flood control Reservoir. In the event of a major storm or operational issue, the City would be responsible for evacuation. No additional health or safety risks will develop because of this event. First Aid will be available and safety precautions enforced. Traffic and other crowd control measures will be maintained by the City.

The permit holder (event organizer) is responsible for all trash collection, including providing and emptying trash cans and dumpsters.

Safety would not be compromised by the Proposed Action or the No-Action Alternative. The City would continue to provide safety oversight at its Recreation Area.

3.9 Socioeconomics and Environmental Justice

There is no housing within the Hansen Dam Reservoir. The nearby area is urbanized and contains a mix of commercial and residential uses.

Traffic in the Hansen Dam Reservoir is associated with the use of recreational features within the Reservoir as well as vehicles using Reservoir roads to reach non-Reservoir locations. The City provides traffic oversight within the Hansen Dam Recreation Area. The adjacent Lakeview Terrace community is largely middle-class, and zoned “residential”, with an ethnically diverse population. The area also hosts a large equestrian community, and is one of the few remaining residential areas in the City of Los Angeles that has private homes zoned for horse keeping. This special event would not create, move or eliminate jobs. The event would provide a historical, educational, and recreational experience for those who choose to come and partake of this free event. Local employment numbers are unlikely to be affected by this temporary, special event.

Up to approximately 3,000 attendees in 1,500 vehicles are expected to attend the event. The City typically oversees large events conducted in its leased area. All parking and traffic will be coordinated by City agencies including DOT, Public Safety, and a parking crew to be hired by the event organizer. The City also encourages bicycling and other traffic-reducing measures, such as the use of public transportation to gain access to this event site. The event site has parking for approximately 5,000 vehicles. Since this is a one-day, free event, there would be no significant change to current socioeconomic or environmental justice considerations.

Neither the Proposed Action nor the No Action Alternative would induce population growth, increase the need for additional housing or increase employment opportunities. The event would be limited to one day within the Reservoir. The event is free, except for helicopter rides. There would be no impact to low income or minority populations. Socioeconomics and Environmental Justice considerations would not be impacted.

4.0 CUMULATIVE IMPACTS

4.1 Past

The City of Los Angeles has provided recreational opportunities at this location for many years. The surrounding area near Hansen Dam Sports Center (but outside of the Corps' remit) has been developed for residential use in recent years, with a few commercial businesses in the upper Hansen Reservoir area. A new museum, the Discovery Cube Los Angeles, was recently built in the northwest Hansen Dam Reservoir area. The City has also initiated construction of a Ranger Station in western Hansen Recreation Area. The City of also provides an equestrian center just east of the proposed Airshow venue. Hansen Dam Reservoir has been home to several large events for many years, as well as open for daily attendance in the Hansen Dam Reservoir's outdoor recreation facilities. This American Heroes Event has also occurred in the past at the same location, under similar circumstances. In combination with the impacts from similar past actions, the impacts from the proposed action would not result in significant impacts.

4.2 Present

The City of Los Angeles provides recreational opportunities of various types each year at this and at other locations within Hansen Dam Reservoir. Special events with several thousand attendees are held throughout the year at designated areas within the Hansen Dam Reservoir. Events generate trash, use, health/safety, and traffic/parking considerations, but these are generally short-term events that occur over a single-day or weekend. Management of traffic and noise concerns by the City requires the event organizer to address security, trash, and health considerations. Local residential development in the adjacent neighborhood is built to capacity at this time, with few new housing projects in the City's planning horizon. In combination with the impacts from similar concurrent actions, the impacts from the proposed action would not result in significant impacts.

4.3 Future

The City of LA will continue to provide recreational opportunities into the foreseeable future at this site. Adjacent areas outside of the Hansen Dam Reservoir will continue to be developed, but the overall expected use of Hansen Dam Reservoir will remain for flood control and for recreation opportunities for the general public. Special event requests are anticipated to continue to occur, with a number of events proposed regularly each year. These events will be evaluated individually or as part of a programmatic assessment. There are no major projects at this time planned for future construction. Use by the Corps and City of the 2011 *Hansen Reservoir Recreation Master Plan* would help maintain sustainable land use planning guidelines. In combination with the impacts from similar future actions, the impacts from the proposed action would not result in significant impacts.

5.0 Summary of Best Management Practices

Approval of the Proposed Action, the approval of the RAP's request to hold the American Heroes Airshow and Festival at Hansen Dam Reservoir would require the event organizer and the RAP to implement the following Best Management Practices (BMPs) to minimize any impacts to human and natural resources within the area of the Proposed Action.:

- The City of Los Angeles, Recreation and Parks Department will hold planning meetings with other City agencies and the event organizer to insure sufficient safety, crowd, and traffic control.
- The City's permit will specifically state that the event may occur only at designated areas, and that access to other areas will not be impeded.
- Clean-up of the event area will be completed by the close of the following business day at 5:00 pm, November 10, 2019.
- Event parking and traffic management would be designed to avoid vehicle backup onto Foothill and Osborne Boulevards, to reduce idling and to enhance roadway safety.
- Use of ride-sharing to the event would be emphasized in outreach and publicity materials.
- Use of bicycling and provided bicycle parking would be emphasized.
- A parking plan overseen by LAPD/LAFD and coordinated with the event organizer would be implemented.
- Air Safety Plan and appropriate agency approvals would be required.
- City Noise Ordinance shall be enforced.
- The City would ensure that the event organizer is responsible for all trash collection, including providing and emptying trash cans and dumpsters. The City would ensure that the event organizer is responsible for cleanup and/or damage in areas used by the event. The City would require a maintenance deposit from the event organizer.
- The City would require the event organizer to obtain insurance for liability and property damage and to indemnify the City and the Corps.
- Portable restrooms shall be provided, and a first-aid station shall be on site.

6.0 APPLICABLE ENVIRONMENTAL LAWS AND REGULATIONS

6.1 National Environmental Policy Act (NEPA) (42 USC 4321 et seq.)

NEPA is the nation's primary charter for protection of the environment. It establishes national environmental policy which provides a framework for Federal agencies to minimize environmental damage and requires Federal agencies to evaluate the potential environmental impacts of their proposed actions. Under NEPA, a Federal agency prepares an EA describing the environmental effects of any proposed action and alternatives to that action to determine if there are significant impacts requiring development of an EIS or if a FONSI is appropriate. The EA must identify measures necessary to avoid or minimize adverse impacts, and all impacts must be reduced to a level below significance in order to rely upon a FONSI.

This EA has been prepared to address impacts associated with the Federal action of granting permission for the Proponent's Preferred Alternative and waiving certain conditions of the Hansen Dam Basin Master Plan Special Events Policy. This Draft EA is being circulated to the public and relevant agencies for a 15-day period.

6.2 Endangered Species Act (ESA) (16 USC 1531 et seq.)

The ESA protects threatened and endangered species, and their designated critical habitat from unauthorized take. Section 9 of the Act prohibits such take, and defines take as to harm, harass, pursue, hunt, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any such conduct. Section 7 of the ESA requires Federal agencies to ensure that any action authorized, funded or carried out by them is not likely to jeopardize the continued existence of listed species or adversely modify their critical habitat.

Consultation with the USFWS or National Marine Fisheries Service is required if the Federal action "may affect" a federally-listed species or designated critical habitat. However, since the proposed event would not affect any species, as it is limited to lands with no occurrences of listed species or designated critical habitat, and no construction activities would be physically implemented, consultation is not required. Corps permission for the proposed event complies with the ESA.

6.3 Migratory Bird Treaty Act (MBTA) (16 USC 715- 715s)

The MBTA prohibits the taking or harming of any migratory bird, its eggs, nests, or young without an appropriate Federal permit. Almost all native birds are covered by this Act and any bird listed in wildlife treaties between the United States and several countries, including Great Britain, Mexican States, Japan, and countries once part of the former Soviet Socialist Republics. A "migratory bird" includes the living bird, any parts of the bird, its nest, or eggs. The take of all migratory birds is governed by the MBTA's regulation of taking migratory birds for educational, scientific, and recreation purposes and requiring harvest to be limited to levels that prevent overutilization. Section 704 of the MBTA states that the Secretary of the Interior is authorized and directed to determine if, and by what means, the take of migratory birds should be allowed and to adopt suitable regulations permitting and governing take. Disturbance of the nest of a

migratory bird requires a permit issued by the USFWS pursuant to Title 50 of the Code of Federal Regulations (CFR).

Since the proposed event is limited to a high-use public recreation area which does not contain migratory bird habitat, and no construction activities would be physically implemented, Corps permission for the proposed event complies with the Act.

6.4 Clean Water Act (CWA) (33 USC 1251 et seq.)

Section 401 of the CWA requires that every applicant for a Federal license or permit for any activity that may result in a discharge into navigable waters must obtain a State Water Quality Certification or waiver that the proposed activity will comply with state water quality standards (*i.e.*, beneficial uses, water quality objectives, and anti-degradation policy). The Los Angeles Regional Water Quality Control Board (RWQCB) issues section 401 Water Quality Certifications for activities within Los Angeles County.

Section 404 authorizes the Secretary of the Army acting through the U.S. Army Corps of Engineers to issue permits for the discharge of dredged or fill materials into the waters of the United States, including wetlands, at specified disposal sites. The selection and use of disposal sites must be in accordance with guidelines developed by the Administrator of EPA in conjunction with the Secretary of the Army and published in 40 CFR Part 230 (known as the 404(b)(1) guidelines). Under the Section 404(b)(1) guidelines, the Corps shall examine practicable alternatives to the proposed discharge and permit only the Least Environmentally Damaging Practicable Alternative (LEDPA).

The proposed event is limited to an air show and festival in upland areas. No construction activities would be implemented. The proposed event does not involve discharge of dredged or fill material in waters of the United States. Therefore a 404(b)(1) analysis is not required and similarly, no other CWA sections are triggered. The proposed event is in compliance with the CWA.

6.5 Clean Air Act of 1970 (42 USC 7401 et seq.)

Section 118 of this Act states that any Federal action that may result in discharge of air pollutants must comply with Federal, state, interstate and local requirements respecting control and abatement of air pollution. Section 176(c) of the Act requires that Federal actions conform to an implementation plan after it has been approved or promulgated under Section 110 of the Act.

The potential air quality impacts of the proposed project have been examined and compared to the significant Federal and regional thresholds, as detailed in Appendix B. A conformity determination is not required for the proposed event. For each criteria pollutant the Reservoir is in nonattainment or maintenance status, the total of direct and indirect emissions of the criteria pollutant or precursor would not equal or exceed any of the rates in 40 CFR 93.153(b)(1) or (2). As a result, the proposed event conforms to the Federal Clean Air Act. Additional details are found in Appendix B.

6.6 Noise Control Act of 1972, as amended (42 USC 4901 et seq.)

Noise generated by any activity, which may affect human health or welfare on Federal, state, county, local, or private lands, must comply with noise limits specified in the Noise Control Act.

With the exception landing/takeoff, an activity which is monitored for safety issues such as crowd control around helicopters/noise, the proposed event is not likely to exceed noise levels to sensitive resources in the area. Noise will continue to be regulated with Federal, state, and local laws and ordinances. Review for this proposal has included avoidance of sensitive ecological areas. The proposed event is in compliance with the Act.

6.7 National Historic Preservation Act (NHPA) (54 USC § 300101, et seq.)

Section 106 of the NHPA requires any Federal agency to take responsibility for the impact of the decisions on historic resources. Under Section 106, Federal agencies are prohibited from approving any federal “undertaking” (including the issuance of any license, permit, or approval), without 1) taking into account the effects of the undertaking on the historic properties, and 2) affording the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on the undertaking. The NHPA forces an agency to stop and consider the consequences of its undertakings on any historic property, and assures that the agency does so by requiring it to receive comment from the ACHP, or agencies acting in its stead, and from the public before proceeding with any such undertaking. In order to comply with the NHPA, a Federal agency considering an undertaking must go through the process outlined in the ACHP’s regulations at 36 C.F.R. Part 800.

Since the proposed project is limited to surface activities in a developed sports complex with turfed fields and paved parking areas with no ground-disturbing activities to be physically implemented, the proposed event has no potential to cause effects to historic properties. As such, the Corps is in compliance with Section 106 of the Act and its implementing regulations (36 CFR part 800), and has fulfilled its obligations under section 106 of NHPA.

6.8 Executive Order 11988, Floodplain Management

In accordance with this EO, the Corps shall take action to “...avoid to the extent possible the long and short term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative.”

This EO requires that Federal Agencies take action to manage the risk and/or impacts of floods on human safety, health, and welfare; and restore and preserve natural and beneficial values served by the floodplains. Each agency also has the responsibility to evaluate potential effects of Federal actions that may be made within floodplains.

Since the proposed project is limited to a one-day event, with no project to be physically implemented, the proposed project would not result in further inducing development in the base floodplain.

6.9 Executive Order 12898, Environmental Justice Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations

EO 12898 is intended to direct each Federal agency “to make achieving environmental justice part of its mission by identifying and addressing... disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low income populations in the [U.S.]...”

No minority or low income communities would be disproportionately affected by implementation of the proposed event, as it is a one-day, free event. The proposed event is in compliance with the EO.



SAFETY & EMERGENCY RESPONSE PLAN

**American Heroes Aviation Network
Los Angeles California**

November 9, 2019



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INTRODUCTION

Planning, communication, and readiness are essential to an effective Safety, Security, and Emergency Response program for the American Heroes Aviation Network. The Airshow operations staff must discipline itself to meet this critical challenge based upon prevention and preparation for the variety of ground or air incidents, which might occur, especially in these days of heightened homeland security.

Our objective is to maintain the highest level of staff, spectator, and aircrew safety.

To succeed, the most important element of the Safety, Security, and Emergency Response policies is to communicate those policies clearly to all persons and agencies involved.

The American Heroes Aviation Network Air Operations is structured around the Federal Emergency Management Agency's (FEMA) National Incident Management System (NIMS). Our Air Operations Director is trained and certified to NIMS IS-1 OO.b, IS-200.b, IS-700.a, IS-704, and IS-800.b standards. He is also trained as a Heli base assistant manager as defined in the Department of the Interior Interagency Helicopter Operations Guide (IHOG). He is additionally certified by the California Department of Transportation (CAL TRANS) Aviation Division as a helicopter landing zone inspector.

EMERGENCY PLAN

In the event of an incident or accident, operational control will pass from the Air Boss to the first-in on-scene Incident Commander upon arrival. The Incident Commander will direct and coordinate the overall incident response to include coordination of mutual assistance support, including Fire/Rescue/EMS, security, and response to the media.

Emergency vehicle access routes to static display and participant aircraft will be maintained throughout the show.

The Heroes Air Show Event Director is the only person authorized to answer Media questions.

GROUND SAFETY PROCEDURES

The following safety procedures will be strictly enforced:

1. The only authorized access inside of the air operations area(s) while aircraft engines are running or rotor blades turning are the Air Boss, Mini Boss, Ramp Safety, the Air Marshalls, the FAA IIC, or the flight crews. **NO EXCEPTIONS!**
2. A hard spectator line of 200' will be strictly enforced between any turning rotor blades and the spectators.
3. A 500' (Cat 3), and/or 1000' (Cat 2) show line will be established between any demonstration aircraft(s) flight path across the ground and all spectators.
4. Periodic ramp checks will take place to assure there are no fuel leaks or safety hazards that present themselves.
5. Protruding antennas, static wicks, and objects on all aircraft that could be broken or could cause injury if contacted should be flagged.
6. Intake covers should be utilized, if available.
7. A FOD walk will be conducted of all ramp areas prior to the first arrival, the beginning of demonstrations, and before the first departure.
8. **NO SMOKING** signs should be posted at the entry gate to the upper area.

It is the responsibility of our air show team members to ensure all safety rules are followed.

GROUND SAFETY EQUIPMENT

Fire extinguishers will be kept on ramp vehicles: Spare **NO SMOKING SIGNS**, caution tape, first aid kit, duct tape, PA bullhorn, etc.

FLIGHTLINE DISCIPLINE

No unauthorized vehicles will be allowed access to or be parked on or near the flightline or inside the air operations areas, unless special arrangements have been made ahead of time with the Air Boss.

Consumption of alcoholic beverages of any kind is forbidden during the hours of the airshow by any person on the flightline, on or near the air operations box, as well as by any airshow staff member.

Smoking is prohibited for everyone.

FLIGHTLINE CONSIDERATIONS

Ramp Driving:

- Only authorized vehicles will be allowed.
- Speed limit on ramp areas is 10 mph, and only 5 mph when in close proximity to aircraft.
- Always keep the driver's side-facing the aircraft.
- Do not leave vehicles unattended with the engine running.
- Do not park vehicles pointing towards aircraft, always away.
- Never drive underneath any part of an aircraft or blades.
- Always set the parking brake before leaving vehicle.
- Take keys to golf carts or mules with you.

STANDARD OPERATING PROCEDURES

1. PURPOSE

Roles and Responsibilities:

• Air Boss

Is in charge of the Air Operations Team and has total overall control of the airspace as well as the ground and air traffic. He works closely with the Heroes Control personnel and Ramp Safety. He is credentialed and has complete access inside the air operations areas at all times. He will lead all safety briefings and be the controlling point for demonstration aircraft.

• Aircraft Marshal

Is a credentialed member of the Air Operations Team and is responsible for the proper ground positioning of aircraft. They are one of the few persons to have authorized access to the air operations area during flight operations.

• Air Operations Assistants

Air Ops Assistants are credentialed members but generally do not have full access during flight operations. They handle duties as assigned to support flight operations.

• Battman (Boy)

Will be a credentialed member of the Air Operations Team. His duties will include issuance and check out of event radios and support equipment at the beginning of the day. He will cycle spare batteries through the chargers throughout the day.

Around lunchtime he will be responsible for delivering freshly charged batteries to the team members and returning used batteries to the chargers. At the end of the day he will check-in event radios and equipment. He will however not be allowed access inside the air operations area when active.

- **Civil Air Patrol (CAP)**

The cadets do not have access inside the air operations area when active, however they do remain just outside for security and crowd control. They will assist in the morning and afternoon FOD walk of the ramp areas. They may assist Ground Ops with support duties. They do not participate in vehicle traffic control. They staff the Ready Alert Team in the areas during the show.

- **EMT Services**

Personnel from the Bobby Sherman Foundation will staff the First Aid tent having mobile transportation, and will facilitate first aid services to the event guests and staff as required. They will have two way radio communications with Air Operations. They are however not credentialed.

- **Event Operations**

These persons are tasked with managing all of the vendor booths, recruitment booths, tables, chairs, and event related equipment other than Air Ops equipment. They will control overall parking and non-aviation site access to display vehicles. They are non-credentialed and do not have access to the air operations areas when active

- **Executive Producer/Public Information Officer - PIO**

Is the head of Ground operations for the American Heroes Air Show. He is the main contact person for any member of City operations, elected officials, the Mayor, Council members, and the news media. He does not have access inside the air operations area when active. He will provide the first welcome all hands briefing in the morning to staff and volunteers.

- **Heroes Control**

This valuable team is responsible for controlling and directing inbound, demonstration, and outbound air traffic coming into or exiting Heroes airspace. Heroes Control will control and direct the ride ship operators during the normal course of the day. They will also be responsible for taking control of departing aircraft after being released by ground control.

- **Incident Commander**

Is the person that would assume control of the airshow in the unlikely *event* of an incident, or accident. The Air Boss will assume this role until relieved by an LAFD Captain or Chief from their first in district.

- **Mini-Boss**

Is the person that directly assists the Air Boss with the performance of his duties. They would be responsible for the direction of vehicle *movement* on the ramp areas before or during open spectator times.

- **Photographers**

There will be a number of media and non-media photographers on site. Photographers who have signed up ahead of time with Air Operations will be granted access to the photographer's area on the North side of the upper air operations area. They will be issued wrist band identification. All persons must remain outside of the air operations area at all times while active. No special access is provided nor allowed.

- **Ramp Safety**

Is a credentialed member of the Air Operations Team with full air operations area access. Their duties include receiving inbound aircraft from Heroes Control and directing them towards the aircraft marshaller. He will join in with the morning safety briefing for staff, along with briefings for the ride ship operators, skydiving teams, and demonstration aircraft crews.

- **Security Chief**

Is in charge of overall security for the air show site. Helps manage photographer access in the morning, and provides for assistance throughout the event. He does hold Air Operations area access and does have photographer's area access.

- **Staff Photographers**

There may be several staff photographers at the event. They are credentialed, and may have access inside the air operations box if they have signed the waiver.

- **Water Tender Wrangler**

This credentialed person assists the Air Operations team with managing the daily operations getting the water tenders to the needed locations before arrivals, demos, and departures. None of the water tenders are allowed into the air operations boxes while rotors are turning without clearance from the Air Boss.

AIR SHOW EMERGENCY OPERATIONS PLAN

1. In the unlikely event of an incident or accident all flight operations will stop immediately. No air operations will resume until the incident has been concluded and the clearance to resume flight operations has been given by the Air Boss.
2. On-site fire response vehicles will respond to the incident/accident scene. The City of Los Angeles Fire Department may set up a command center, and the Captain will assume the role of Incident Commander.
3. If so required, the CAP cadets will form a site/scene perimeter around the incident and provide a safety and security line to prevent unauthorized persons from gaining access to the incident site.
4. There are to be *NO* members of the media allowed inside of the secured perimeter, no matter how many credentials they show you, they are not allowed, period.
5. The media will try to obtain a statement from you. The only person to have contact with the media is the Executive Producer /PIO.
6. Radio controlled models, free-flight, airplanes, gliders, or rotorcraft, Unmanned Aerial Systems (UAS), Unmanned Aerial Vehicles (UAV), multi rotor platforms of any kind are all prohibited by the airspace waiver and if operated during the

event at anytime will cause the immediate grounding of all in-flight aircraft until the threat is cleared.

MEDICAL EMERGENCY ON HELO RIDESHIP

- If there is a medical emergency aboard the Rideship helicopter while in-flight, the pilot will contact the Heroes Control who will contact the Medic Chief.
- The pilot will return to the heli-pad immediately. The pilot should try to determine the nature of the emergency if practicable.
- The medical personnel will determine the nature of the emergency with the patient and call 9-1 -1 if required. The sick person should be transported to Event Operations (if safe to do so) and an Event Operations person or CAP member should meet the LAFD ambulance at the front gate and escort them to the patient's location.

AIRSHOW RADIO CALL SIGNS

RADIO CHANNEL	1	AIR OPS SiMPLEX
		2 EVENT OPERATIONS
		3 PARKING CONTROL
		4 Water Tenders
		5 Staff Photographers
		6 Medic Operations
	16	Air Operations Repeater
Air Boss		Heroes Air Show Air Boss
Assist 1, 2		Air Operations Assistants
Air Marshall 1,2 ,3		Aircraft Marshalers
CAP 1, 2, etc		Civil Air Patrol OIC, Adult Leaders
MEDIC 1, 2		Bobby Sherman Team
CFR 1, 2		Fire In Motion - upper flower area
ENGINE _____		LAFD Engine - CFR in lower area
EVENT 1, 2, etc		Event operations, vendor control
EXEC 1		Executive Producer

Heroes Control
 (Air Band) Airborne communications staffed by the Air Operations Team

Heroes Ground

(Air Band)	Aircraft ground comms staffed by Ramp Safety/Air Ops Team
INSPECTOR 1, 2	LAFD on site Inspector's
Mini-Boss	Air Boss's assistant
Photo 1, 2	Staff still photographers
Ramp Safety	Ramp Safety Coordinator
Ready Alert Team	CAP cadets wearing green vests
Security 1, 2, etc	Chief of Security, security staff
Video 1,2	Staff videographers

HEROES Air Operations Frequency Usage: VHF AM AIR-BAND FREQUENCY'S

- **HEROES CONTROL** - Aircraft air-to-air, air-to-ground communications control frequency. Protected to 20 SM and 5000' AGL.
- **HEROES GROUND** - Aircraft ground control frequency. Protected to 10 SM and 1000' AGL only.
- **HEROES AIR BOSS** - Aircraft air-to-ground, ground-to-ground direct frequency to the Air Boss. Protected to 10 SM and 3000' AGL.
- **PERFORMER DISCREET** - Aircraft air-to-ground PA system input. Protected 20 SM and 13,000' AGL.
- **BACK-UP** - Used as an alternate frequency in case of a stuck mic.

UHF FM FREQUENCY USAGE

- **Air Ops 1** Typically channel on all event radios, used for un-secure operational communications.
- **Event Ops 2** Typically channel 2 on all event radios, used or un-secure event operation communications.
- **Parking 3** Typically channel 3 on all event radios, used for un-secure parking and intersection control communications.
- **Water Tender 4** Typically channel 4 on all event radios, used for un-secure water tender operation communications.
- **Photo 5** Typically channel 5 on all event radios, used for un-secure Staff photographer's communications.
- **MEDIC 6** Typically channel 6 on all event radios, used for un-secure Bobby Sherman Team communications.
- Secure -** Specially designated channel on SOME event radios for secure encrypted communications between key event staff. NOT available on all radios.
- Repeater 16** Air Operations repeater channel un-secure

Note: Heroes Control, Heroes Ground, Air Ops, and Ground Ops are digitally recorded throughout the entire day.

NOTES / Comments / Follow up

APPENDIX B

Air Quality Analysis for Proposed American Heroes Airshow and Festival, November, 2019

AIR QUALITY

Climate

The climate of the project area is typical of the Mediterranean climate of coastal California, which is characterized by cool, dry summers and mild, wet winters. The hottest month is August with an average maximum temperature of 74°F and December is the coldest month with an average minimum temperature of 64°F. Precipitation averages 10.69 inches annually, with February as the wettest month.

Air Quality

The project area is within the South Coast Air Basin which includes Los Angeles, Orange, and portions of Riverside, and San Bernardino Counties. Air quality within the project area is governed by the South Coast Air Quality Management District (SCAQMD). To protect the public health and welfare, the Federal and state governments have identified five criteria air pollutants and a list of air toxics and have established ambient air quality standards through the Federal Clean Air Act and the California Clean Air Act. The air pollutants for which Federal and state standards have been promulgated and that are most relevant to air quality planning and regulation in the air basins include ozone (O₃), carbon monoxide (CO), suspended particulate matter (PM), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), Reactive Organic Gasses (ROG), Volatile Organic Compounds (VOC), and lead (Pb). PM comes in a range of sizes. PM emissions are regulated in two size classes: Particulates up to 10 microns in diameter (PM₁₀) and particulates up to 2.5 microns in diameter (PM_{2.5}).

A state or region is given the status of “attainment” or “unclassified” if ambient air quality standards have not been exceeded. A status of "nonattainment" for particular criteria pollutants is assigned if the ambient air quality standard for that pollutant has been exceeded. Once designated as nonattainment, attainment status may be achieved after three years of data showing non-exceedance of the standard. When an area is reclassified from nonattainment to attainment, it is designated as a “maintenance area,” indicating the requirement to establish and enforce a plan to maintain attainment of the standard.

California classifies areas of the state as attainment, nonattainment, nonattainment-transitional, extreme or unclassified with respect to the state air quality standards. The California Ambient Air Quality Standards designations and SCAQMD emissions thresholds are discussed for this Federal action as part of the NEPA significance thresholds and impact evaluation.

The attainment status of the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) are shown below:

Table 1: 2018 South Coast Air Basin Attainment Status		
Pollutant	National AAQS	California AAQS
Carbon Monoxide (CO)	Attainment/Maintenance	Unclassified

Ozone (O3) (1-hour standard)		Extreme
Ozone (O3) (8-hour standard)	Nonattainment-Extreme	Nonattainment
Nitrogen Dioxide (NO2)	Attainment/Maintenance	Attainment
Sulfur Dioxide (SO2)	Attainment	Attainment
Particulate Matter (PM10)	Attainment/Maintenance	Nonattainment
Particulate (PM2.5)	Nonattainment-Moderate	Nonattainment
Lead	Nonattainment	Nonattainment
Source: http://www.arb.ca.gov/desig/adm/adm.htm		

Significance Threshold

Based on the existing conditions described above, impacts would be considered significant if the alternative:

- Exceeds General Conformity Rule *de minimis* thresholds.
- Frequent exceedence of SCAQMD daily operational significance thresholds.

Methodology

Estimated calculations of car emissions for the above table was generated using the Emissions Factors for On-Road Passenger Vehicles & Delivery Trucks published by the South Coast Air Quality Management District. The provided list of emission factors in pounds per hour (lb/hr) includes: Reactive Organic Gasses (ROG; also known as Volatile Organic Compounds (VOCs)), Carbon Monoxide (CO), Nitrous Oxides (NOx), Sulphur Oxides (SOx), Particulate Matter (PM), Carbon Dioxide (CO₂), and Methane (CH₄). 2014 fleet emission factors were utilized in calculations. The factors were then multiplied by the estimated predicted driving distance (50 miles round trip) for each car during the event to produce an estimated emission per car. An estimated 1,500 cars was then multiplied against that number to produce an estimated emission for each pollutant for the cars during this event.

Estimated calculations of helicopter emissions for the above table were generated using the Guidance on the Determination of Helicopter Emissions document produced by the Federal Office of Civil Aviation of the Swiss Federation. These emission factors are not actual measured emissions but were based on various mechanical properties of the helicopters. Furthermore, the emissions factors for pollutants were limited relative to vehicle emissions factors. Only emission factors that had corresponding vehicle emissions factors (e.g., NOx and CO) were utilized. The emission factors were then multiplied across the predicted flight times and predicted number of take-off and landing cycles to produce the pollutant emission estimates. A list of assumptions for helicopter emissions are provided below:

- A cruising speed of 100 miles per hour was used to calculate travel time.
 - The continuously operating helicopters were predicted to only have one take-off & landing cycle (i.e. the units would take-off from their standby location and land there, not touching down at the Hansen Dam).
 - The continuously operating helicopters were predicted to have a flight time of 8 hours.

- The helicopters that will land at the Hansen Dam were predicted to have two take-off & landing cycles (i.e. the units would take-off from their standby location, land at the Hansen Dam, take off from the Hansen Dam, and land at their standby location).
- Emissions for similar models were used when specific models were not presented:

Substituted Models	
Listed	Used
B-206	B-206L
EC-145	EC-155B
AS-350	AS-350B
AW-139	A-139

No Action Alternative (Alternative 1)

Under Alternative 1 a license would not be granted for the air show. There would be no utilization of helicopters within Hansen Dam. Accordingly, the use of vehicles by visitors and participants would not be required. Under the No Action Alternative there would be no impacts to air quality. Air quality would continue to be influenced by climatic conditions, as well as local and regional emissions from mobile and stationary sources.

Proposed Alternative (Alternative 2)

Under the Proposed Alternative, under which the Corps would allow the City of Los Angeles to permit the event, approximately 1,500 vehicles are expected to be driven to the air show. Furthermore, 20 helicopters would be flown to Hansen Dam. Of the total amount approximately 3 helicopters would be flown throughout the day for demonstration purposes. Maximum estimated emissions are presented in the table below. Total emissions for both cars and helicopters would exceed daily SCAQMD NO_x and CO thresholds. However, the air show is a one day event.

Thus, repeated exceedence of SCAQMD daily operational thresholds is not expected. Furthermore, annual emissions from the one day event would be below General Conformity de minimis thresholds. As a result, air quality impacts would be less than significant.

Conformity Determination

On November 3, 1993, the U.S. Environmental Protection Agency issued the General Conformity Rule, stating that Federal actions must not cause or contribute to any violation of a National AAQS or delay timely attainment of air quality standards. A conformity determination is required for each pollutant where the total of direct and indirect emissions caused by a Federal action in a non-attainment or maintenance area exceeds de minimis threshold levels listed in the rule (40 CFR 93.153). As stated above, SCAB is a non-attainment or maintenance area for PM_{2.5}, PM₁₀, CO₂, 1-hour ozone, and 8-hour ozone. Estimates of lead emissions were not calculated. Lead emissions from mobile sources, including “Jet A” fuel commonly used in helicopters, significantly decreased due to the near elimination of lead in fuels under the Clean

Air Act. Thus, there are no emission factors available for mobile sources. Little to no quantifiable and foreseeable lead emissions would be generated by the proposed event. Volatile Organic Compounds (VOCs) are listed in lieu of ozone. Many VOCs are precursor molecules that undergo chemical changes which form into ozone and smog after becoming exposed to sunlight in the Earth's lower atmosphere. Therefore, VOCs are used as an indicator for ozone emissions.

Comparison of Federal de minimis Thresholds, SCAQMD Thresholds, and Maximum Estimated Emissions					
	Thresholds		Cars (lbs)	Helicopters (lbs)	Total (lbs/tons)
	SCAQMD (lbs/day)	Federal de minimis (tons/year)			
VOCs	55	10	52.67	-	52.67/0.03
NOX	55	100	49.11	225.71	274.83/0.14
SOX	150	100	0.80	-	0.8/0.00
CO	550	100	495.26	355.96	851.22/0.43
PM2.5		100	4.45	-	4.45/0.00
PM10	150	100	6.89	-	6.89/0.00

The estimated emissions are less than the yearly de minimis thresholds established by the U.S. EPA for conformity analyses. Therefore, a conformity determination is not required.