



South Coast
Air Quality Management District
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**Final Environmental Impact Report (Final EIR) for the
Proposed II Villaggio Toscano Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be considered prior to adoption of the Final CEQA document.

SCAQMD staff originally commented on this project during the Draft EIR commenting period. At the time, we expressed concern with placing residents within such close proximity to one of the busiest freeway interchanges in southern California. SCAQMD staff maintains that until vehicle emissions can be more effectively controlled, buffer zones remain the most effective mitigation to reduce exposure. We made several comments regarding the technical air quality analysis in the Draft EIR, including the Health Risk Assessment (HRA) that was conducted for the site. In the Final EIR, the lead agency has provided written responses to all of our comments. In addition, it appears that the HRA was revised and the dispersion modeling files were provided to SCAQMD staff on cd. However SCAQMD staff was unable to locate any of the accompanying emission calculations in the Final EIR in either pdf or electronic format. Without these calculations, SCAQMD staff cannot confirm whether the revised HRA demonstrates that air quality impacts on future residents will fall below thresholds from the adjacent freeways' emissions.

Further, the proposed mitigation, installation of MERV16 rated filters in the building's ventilation system appear to be a unique measure. SCAQMD staff is not aware of any other residential project with filters rated higher than MERV 13. The MERV scale does not test filter efficiency for particles sizes below 0.3 microns, yet the particles from freeway exhaust found to be of highest concern in recent research are ultrafine particles (<0.1 microns). Although some filters may be effective at these smaller size ranges, because of the unique demands of this project, SCAQMD staff recommends that the specific filters required for this project go through a verification process to ensure that they will meet the specified requirements for all particle size ranges.

Sincerely,

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

Ian MacMillan

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

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