



**South Coast
Air Quality Management District**
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August 11, 2016

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**Draft Environmental Impact Report (DEIR) for the
Proposed ICON Sherman Oaks Mixed-Use Project
(ENV-2014-1362-EIR and SCH NO. 2014071001)**

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 incorporated into the Final EIR.

Project Description

In the project description, the Lead Agency proposes a mixed-use project that will retain but remodel the existing 126,674 square foot, three-story office building and develop the 8.3-acre site with residential and commercial uses. The residential portion of the project will be comprised of three buildings that will house a total of 298 new multi-family residential units. Approximately 39,241 square feet of commercial uses will also include approximately 7,241 square feet for restaurant purposes. Parking will be provided for up to 1,345 parking spaces with two-below grade parking levels planned for Building C. Soil disturbance activities will include approximately 162,000 cubic yards of grading and require approximately 157,400 cubic yards of soil export. Construction will occur over a 33-month period and is planned to be completed in 2018.

Health Risk Assessment and Associated Mitigation

The Lead Agency notes that the project site is near the Hollywood (US-101) Freeway with portions of the residential buildings located within 500 feet of US-101. Based on the Health Risk Assessment (HRA), the Lead Agency estimated the potential cancer risk from nearby SCAQMD permitted stationary sources and from potential exposure to diesel particulate matter, a toxic air contaminant, from vehicles operating on the nearby freeway. Based on the HRA results from all sources, the total maximum cancer risk to the residents would be 17 in one million, which would exceed the SCAQMD's recommended significance threshold of 10 in one million cases. To reduce the estimated risk to a less than significant level,¹ the Lead Agency proposes mitigation including installation of a heating, ventilation, and air conditioning (HVAC) air filtration system in each residential building. The air filtration system will have a Minimum Efficiency Reporting Value (MERV) of 13 or higher. HVAC and air filtration system support actions will include the servicing of these systems and are

¹ DEIR, Appendix IV – Environmental Impact Analysis – B, Air Quality, Page IV.B-59.

also part of the development's proposed mitigation.² Based on the proposed mitigation, the project's cancer risk was estimated to be less than significant.

Limits to Enhanced Filtration Units

The Lead Agency should consider the limitations of the proposed mitigation for this project (enhanced filtration) on housing residents. For example, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. The proposed mitigation also assumes that the filters operate 100 percent of the time while residents are indoors. These filters also have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of this mitigation should therefore be evaluated in more detail prior to assuming that it will sufficiently alleviate near roadway exposures.

Compliance With SCAQMD Rules

Finally, the project includes some demolition that could occur during the renovation of the existing Sunkist Building and soil disturbance activities during grading and excavation that could fall under the following SCAQMD rules: Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities would apply if asbestos is found during demolition, and Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil would apply if soils containing Volatile Organic Compounds (VOCs) are encountered during soil disturbance activities. If applicable, compliance with these rules should be included in the Final EIR.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the Lead Agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist CEQA Section, at (909) 396-3302, if you have any questions regarding the enclosed comments.

Sincerely,

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JW:GM

LAC160802-01
Control Number

² Support actions described on Page IV-B-58 in Mitigation Measure (MM) B-2 and in MM-BB-3 describes added features to support reduced exposures to future sensitive receptors.