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Draft Environmental Impact Report (EIR) for the Proposed Pure Water Southern California Project (Proposed Project) (SCH No.: 2022090654)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The Metropolitan Water District of Southern California is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has provided a brief summary of the project information and prepared the following comments organized by topic of concern.

Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Lead Agency proposes to construct and operate facilities and associated components to be able to further treat cleaned wastewater from the A.K. Warren Water Resource Facility (Warren Facility) to produce 150 million gallons per day (MGD) of purified water.[1] The Proposed Project would be implemented in two phases, Phase 1 and Phase 2, with Phase 1 focused on the production and conveyance of up to 115 MGD of purified water, and Phase 2 increasing the production and conveyance capacity by 35 MGD, to achieve the full design capacity of 150 MGD.[2] Details of each phase are listed as follows.

Phase 1 involves the construction of:[3]

- A new Advanced Water Purification (AWP) Facility, ancillary facilities, and improvements at the existing Warren Facility (South Coast AQMD Facility ID 800236) at the Joint Treatment Site;
- 39 miles of conveyance system infrastructure with pump stations and service connections;
- New spreading facilities and injection wells at groundwater recharge sites in the West Coast, Central, and Main San Gabriel groundwater basins;
- New Direct Portable Reuse (DPR) facilities at the Weymouth water treatment plant (WTP) and associated conveyance facilities;
- New facilities to serve non-portable end uses predominantly in the South Bay, including pipelines and service connections;

[1] Draft EIR. p.4-1.
[2] *Ibid*.
[3] *Ibid*.

- A new Workforce Training Center; and
- Demolition and relocation of several existing support facilities within the Warren Facility.

Phase 2 involves the construction of: [4]

- Additional DPR facilities, which could be sited at one of three locations (the AWP Facility, the Weymouth WTP, or a different, satellite location);
- Modifications necessary to expand the AWP Facility; and
- A new DPR pipeline connection with a pump station

The Joint Treatment Site component of the Proposed Project is bounded by Interstate I-110 to the west, Main Street to the east, Lomita Blvd to the south, and Sepulveda Blvd to the north.[5] The 39-mile conveyance system stretches from the City of Carson to the City of Azusa.[6] Based on a review of an aerial image of the site, the nearest sensitive receptor (e.g., residences) is located within 100 feet to the south of the AWP Facility at the Joint Treatment Site. Phase 1 is scheduled to begin construction in 2027 and become operational in 2035,[7] while Phase 2 is scheduled to begin construction in 2035 and become operational in 2040.[8]

South Coast AQMD Comments

Potentially Underestimated Construction Emissions

According to Section 5.1: Air Quality of the Draft EIR, the construction activities at the Joint Treatment Site will include the removal of contaminated soils, in addition to other associated tasks such as excavation, clearing, and site preparation.[9] As noted in this section, mass excavation activities are estimated to generate approximately 552,000 cubic yards (cy) of soil during Phase 1 and 154,000 cy of soil during Phase 2.[10] The construction air quality analysis explained that approximately 20 percent of the total excavated material would be classified as hazardous and would require off-site transport to a Class II landfill, presumed to be located approximately 200 miles from the project site.[11]

However, the emissions calculations in the Draft EIR relied on the default California Emission Estimator Model (CalEEMod)[12] one-way haul truck trip distance of 20 miles associated with material hauling activities, including the export of soil that is classified as hazardous. The 20-mile default distance substantially underrepresents the actual haul trip distance of 200 miles to the nearest hazardous waste facility for the portion of the soils that will be sent to a Class II landfill. As a result, the emissions from haul truck trips during construction, particularly the portion attributed to the handling and disposal of hazardous soils, are underestimated in the current air quality analysis.

To ensure an accurate quantification of construction-related emissions, particularly for regional criteria pollutants and greenhouse gases, the Lead Agency is recommended to revise the CalEEMod model

[4] *Ibid*. p.4-2.
[5] *Ibid*. P. 4-4.
[6] *Ibid*. p.4-1.
[7] *Ibid*. p. 4-1.
[8] *Ibid*. p. 4-3.
[9] *Ibid*. p. 5.1-16.
[10] *Ibid*.
[11] *Ibid*. p. 5.1-17.
[12] CalEEMod webpage version available at https://www.caleemod.com/

inputs to reflect either: 1) the actual distance to a known and permitted Class II hazardous waste disposal facility expected to be used by the project, if different from what was previously disclosed in the Draft EIR; or 2) the 200-mile haul distance to be consistent with what was previously disclosed in the Draft EIR. The selected trip length should be clearly disclosed and justified in the Final EIR. Should the Lead Agency elect not to revise the default 20-mile haul distance, a detailed rationale supported by substantial evidence in the administrative record must be provided to demonstrate the appropriateness of the default assumption in the context of the project-specific conditions.

Potentially Underestimated Operational Emissions

According to Chapter 4.0: Project Phasing and Detailed Description of the Draft EIR, up to eight 4-megawatt (MW) diesel-powered generators are proposed to be installed and sited adjacent to the distribution switchyard at the AWP Facility to provide emergency backup power.[13] However, according to the operational emissions file provided by the Lead Agency, AWTFacilityOperationalEmissions_Apr2025,[14] the calculation of total daily operational emissions appears to reflect emissions from one 4-MW diesel-powered generator, instead of all eight units. This omission substantially underestimated the total potential emissions of criteria pollutants and toxic air contaminants during emergency operations, as well as during routine testing from all eight sources. To ensure the air quality analysis accurately reflects project-generated emissions under worst-case operational scenarios, the Lead Agency is recommended to revise the operational emissions calculations to incorporate all eight diesel generators and revise the level of significance determination accordingly.

In addition, the annual operational emissions estimates presented in the same file (AWTFacilityOperationalEmissions_Apr2025) appear to have been calculated based on an operational schedule of one hour per day for 30 days per year, totaling 30 hours annually per generator. However, it is important to note that South Coast AQMD air permits issued for emergency standby engines typically allow up to 50 hours per year for maintenance and testing, with a maximum of 200 total operational hours per year (including emergency use). As a result, the analysis of operational emissions for these eight new emergency engines should calculate the future emissions based on the assumption of 200 hours of operation per year per unit. If fewer hours are assumed for any or all of the new emergency engines, South Coast AQMD staff would need to include a permit condition to limit operations of these emergency engines to the hours specified in the CEQA analysis. Therefore, the Lead Agency is recommended to revise the emissions calculations for the emergency engines to reflect the maximum allowable usage. These revisions should be incorporated into the analysis of operational emissions, and the level of significance should be re-examined and updated accordingly. The revised calculations and supporting evidence should be included in the Final EIR.

Additional Mitigation Measures May Be Needed to Reduce Impacts During Construction

According to Section 5.1: Air Quality of the Draft EIR, mitigation measures AQ-MM-1 and AQ-MM-2 have been identified to reduce the potentially significant air quality impacts during construction.[15] After application of these mitigation measures, the mitigated construction-related nitrogen oxides (NOx) emissions would be reduced to 94.52 pounds per day (lb/day),[16] which is slightly less than the South Coast AQMD air quality significance threshold during construction (e.g., 100 lb/day). To

[13] *Ibid*. p. 4-9.
[14] Provided spreadsheet labeled as AWTFacilityOperationalEmissions_Apr2025.
[15] *Ibid*. p. 5.1-33.
[16] *Ibid*. p. 5.1-34.

achieve additional reductions in construction emissions to ensure that this air quality significance threshold is not exceeded, the Lead Agency is recommended to also impose an additional mitigation measure which requires, at a minimum, the use of heavy-duty on-road diesel trucks for hauling activities that meet or exceed the California Air Resources Board (CARB) 2010 engine emissions standards (0.01 g/bhp-hr for particulate matter (PM) and 0.20 g/bhp-hr for NOx).[17]

In addition, given the long-range duration of the Proposed Project from 2027 to 2040,[18] Tier 4 technology may not be the cleanest technology available, such that additional emission reductions could be achieved during construction. For example, according to the CARB Strategies for Reducing Emissions from Off-Road Construction Equipment,[19] Tier 5 off-road engines will be deployed starting in 2027 or 2028. In addition, Governor Newsom's Executive Order N-79-20, issued in September 2020, directed CARB to develop and propose a full transition to Zero Emissions (ZE) equipment by 2035.[20] Considering the scope and duration of the Proposed Project, which will occur concurrently with these regulatory changes, the Lead Agency is recommended to include a mitigation measure that requires the use of the cleanest technology available.

The Lead Agency is also recommended to commit to using the cleanest technology, where feasible, to minimize the NOx and PM emissions from construction by:

- Requiring the utilization of ZE technology in lieu of some or all diesel-fueled construction equipment; and

- Limiting the usage of older diesel-fueled engines in favor of Tier 4 or higher engines, if ZE technology is not available for certain equipment categories.

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Information on the CERP for the Designated AB 617 Wilmington, Carson, West Long Beach (WCWLB) Community

The Proposed Project area includes the AB 617-designated WCWLB community, which is heavily impacted by air pollution generated from other existing sources such as ports, refineries, the oil and gas industry, heavy-duty diesel trucks, warehouses, and railroad activities. As part of the AB 617 process, South Coast AQMD is required to work with a Community Steering Committee (CSC) to develop a Community Emission Reduction Plan (CERP) that identifies air quality priorities and related actions to reduce air pollution in the community. The South Coast AQMD Governing Board adopted the WCWLB CERP on September 6, 2019.[21] The Lead Agency is recommended to review the actions to reduce air pollution in the community included in Chapter 5 of the WCWLB CERP, available at https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf. The Lead Agency is also recommended to continue working with South Coast AQMD to explore whether additional measures to mitigate or

[17] CARB's Optional Reduced NOx Standards for Heavy-Duty Vehicles available at https://ww2.arb.ca.gov/our-work/programs/optional-reduced-nox-standards
[18] *Ibid*. p. 4-1 and 4-3.
[19] CARB Strategies for Reducing Emissions from Off-Road Construction Equipment available at https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/combined-construction-carb-amp-aqmp-presentations-01-27-21.pdf
[20] Governor Newsom's Zero-Emission by 2035 Executive Order (N-79-20) available at https://www.gov.ca.gov/wp-content/uploads/2020/09/9.23.20-EO-N-79-20-Climate.pdf
[21] South Coast AQMD. September 2019. Assembly Bill 617 Wilmington, West Long Beach, Carson Community Emissions Reduction Plan available at https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/cerp/final-cerp-wcwlb.pdf

further reduce emissions can be implemented at the Proposed Project to support actions in the WCWLB CERP.

Section 5.0.3.6: Community Improvement and Benefits of the Draft EIR contains a discussion, which commits the project proponent to plugging or re-plugging eight onsite oil wells while seeking to seal four others, which are either active or idle.[22] Oil wells are an air quality priority in the WCWLB CERP, and actions taken to plug, re-plug, and/or seal oil wells are consistent with the actions listed in Objective 1 of CERP Chapter 5e, whose goal is to ultimately reduce air pollution from oil wells. With this objective in mind, it would be helpful if the Lead Agency could disclose a timeline for implementing this commitment so as to increase accountability and ensure that action is taken.

Sections 5.1.5.3 and 7.3.1 of the Draft EIR conclude less than significant impacts on sensitive receptors and less than significant contributions towards any cumulative impacts;[23] however, such populations face burdens as a result from the cumulative exposure from many emission sources. While Section 5.0.3.7: Outreach Charter and Good Neighbor Guidelines of the Draft EIR contains many recommendations,[24] the Lead Agency is recommended to include a provision that requires the project proponent to commit to funding air filtration systems (such as portable air purifiers) for any sensitive receptors, such as homes and schools, located near construction sites and the operating facility in Carson. Air filtration systems are a low-cost method to reduce exposure to additional emissions on sensitive populations might face as a result of construction and operational activities, while helping further Objectives 2 and 3 in Chapter 5g of the WCWLB CERP, as well as help further the goals of the Lead Agency's Good Neighbor Guidelines.

In Section 5.1.4: Environmental Commitments of the Draft EIR, the discussion mentions implementing truck idling limits consistent with California law as one of the air quality environmental commitments.[25] To supplement these commitments and to help further Objective 1 in Chapter 5b of the WCWLB CERP, the Lead Agency is recommended to include a provision which requires the installation of "no truck idling" signs around the construction sites to serve as reminders to truck operators and construction site supervisors about the need to conform to the truck idling limits,. For an example of how to implement this recommendation, please refer to the map that can be found at https://www.aqmd.gov/docs/default-source/ab-617-ab-134/steering-committees/wilmington/no-idling-signs-map.pdf, which shows the installations of “no truck idling” signs installed at various sites in the Wilmington area as required by the Los Angeles Department of Transportation (LADOT) in accordance with CARB's direction. In addition, design specifications for the SR63 (CA) or SR63A (CA) sign designations, which regulate truck idling signage, can be found in the California Department of Transportation Manual on Uniform Traffic Control Devices (MUTCD).[26]

South Coast AQMD Air Permits and Role as a Responsible Agency

According to the Draft EIR, the Proposed Project would utilize eight 4-MW diesel generators to provide emergency backup power, for which air permits from South Coast AQMD will be required. However, the Draft EIR does not provide details or complete emission estimates associated with this equipment. The Lead Agency is recommended to revise the project description and

[22] *Ibid*. p. 5-4.
[23] *Ibid*. p. 5.1-24 and 7-8
[24] *Ibid*. p. 5-5.
[25] *Ibid*. p. 5.1-13.
[26] California Department of Transportation Manual on Uniform Traffic Control Devices available at https://dot.ca.gov/-/media/dot-media/programs/safety-programs/documents/ca-mutcd/rev9/2025-camutcd-2014-rev9-all.pdf. p. 244.

analysis/calculations to include all of the construction and operation emissions associated with all of these diesel generators, plus any chemicals and their associated storage needs and delivery methods.

The Final EIR should also include a discussion about the South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,[27] Rule 203 – Permit to Operate,[28] Rule 401 – Visible Emissions,[29] Rule 402 – Nuisance,[30] Rule 403 – Fugitive Dust,[31] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[32] Rule 1113 – Architectural Coatings,[33] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[34] Rule 1179 – Publicly Owned Treatment Works Operations,[35] Regulation XIII – New Source Review,[36] Rule 1401 – New Source Review of Toxic Air Contaminants,[37] Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,[38] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[39] etc.

In addition, it is important to note that since air permits from South Coast AQMD are required, South Coast AQMD's role under CEQA is as a Responsible Agency. CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Also, as set forth in CEQA Guidelines Section 15096(h), the Responsible Agency is required to make Findings in accordance with CEQA Guidelines Section 15091 for each significant effect of the project and issue a Statement of Overriding Considerations in accordance with CEQA Guidelines Section 15093, if necessary. Lastly, as set forth CEQA Guidelines Section 15096(i), the Responsible Agency may file a Notice of Determination.

CEQA Guidelines Section 15096 sets forth specific procedures for a Responsible Agency, including making a decision on the adequacy of the CEQA document for use as part of the process for conducting a review of the Proposed Project and issuing discretionary approvals. Moreover, it is important to note that if a Responsible Agency determines that a CEQA document is not adequate to rely upon for its discretionary approvals, the Responsible Agency must take further actions listed in CEQA Guidelines Section 15096(e), which could have the effect of delaying the implementation of the Proposed Project. In its role as CEQA Responsible Agency, the South Coast AQMD is obligated to ensure that the CEQA document prepared for this Proposed Project contains a sufficient project description and analysis to be relied upon in order to issue any discretionary approvals that may be needed for air permits.

For these reasons, the final CEQA document should be revised to include a discussion about any and all new stationary and portable equipment requiring South Coast AQMD air permits, provide the

[27] South Coast AQMD. Rule 201 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[28] South Coast AQMD. Rule 203 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[29] South Coast AQMD. Rule 401 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[30] South Coast AQMD. Rule 402 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[31] South Coast AQMD. Rule 403 available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[32] South Coast AQMD. Rule 1110.2 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[33] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[34] South Coast AQMD. Rule 1166 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[35] South Coast AQMD. Rule 1179 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf
[36] South Coast AQMD. Regulation XIII available at https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[37] South Coast AQMD. Rule 1401 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[38] South Coast AQMD. Rule 1466 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[39] South Coast AQMD. Rule 1470 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

evaluation of their air quality and greenhouse gas impacts, and identify South Coast AQMD as a Responsible Agency for the Proposed Project as this information will be relied upon as the basis for the permit conditions and emission limits for the air permit(s). Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions regarding what types of equipment would require air permits. For more general information on permits, please visit South Coast AQMD's webpage at https://www.aqmd.gov/home/permits.

Conclusion

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a-b), the Lead Agency shall evaluate comments from public agencies on the environmental issues raised and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please provide South Coast AQMD written responses to all comments contained herein at least 10 days prior to the certification of the Final EIR. In addition, as provided by CEQA Guidelines Section 15088(c), if the Lead Agency's position is at variance with recommendations provided in this comment letter, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

Thank you for the opportunity to provide comments. South Coast AQMD staff are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov should you have any questions.

Sincerely,

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