



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

May 9, 2025

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Soboba Tribal Environmental Department

P.O. Box 487

San Jacinto, CA 92581

**Initial Study/ Mitigated Negative Declaration - Environmental Assessment**  
**(IS/MND-EA) for the**  
**Soboba Band of Luiseño Indians Septic to Sewer Conversion Project**  
**(Proposed Project)**  
**(SCH No: 2025040477)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The State Water Resources Control Board (SWRCB) and the Indian Health Service are the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) Lead Agencies, respectively, 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 which are organized by topic of concern.

**Summary of Proposed Project Information in the IS/MND-EA**

Based on the IS/MND-EA, the Proposed Project includes approximately 19.6 miles of sewer pipelines, lift stations, and staging areas, primarily within the Soboba Band of Luiseño Indians' 8,320-acre Reservation, with some off-Reservation segments in the City of San Jacinto and unincorporated County of Riverside.<sup>1</sup> Several sensitive receptors, including on-Reservation and off-Reservation residences, the Noi Indian School, Soboba Preschool, and a community park (The Oaks at Soboba), are located within a quarter-mile of the Project Site.<sup>2</sup> The Proposed Project is located on the Band's 8,320 acres Reservation, in an unincorporated area of Riverside County and within the City of San Jacinto.<sup>3</sup>

**South Coast AQMD Comments**

*South Coast AQMD Air Permits and Role as a Responsible Agency*

Depending on the specific equipment proposed for use during the implementation of the Proposed Project, there may be instances where air permits from South Coast AQMD could be required. This could include stationary and portable sources such as emergency generators, fire water pumps, boilers, spray booths, and similar equipment. If such permits are required, South Coast AQMD's role may change from a Commenting Agency to a Responsible Agency under

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<sup>1</sup> MND, Page 7.

<sup>2</sup> *Ibid*, Page 108.

<sup>3</sup> *Ibid*, Page 7.

CEQA. Since most of the Proposed Project site is located on tribal land managed by the EPA, South Coast AQMD may not have direct authority over air permits. However, to ensure compliance, it would be better for the Final IS/MND-EA to include a discussion about any new stationary and portable equipment that might require South Coast AQMD air permits, particularly if the equipment is located within South Coast AQMD's jurisdiction.

In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agencies are required to consult with South Coast AQMD. In addition, 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 evaluating the applications for air permits.

Additionally, it would be helpful for the Final MND to include calculations and analyses for construction and operation emissions related to these potential new stationary and portable sources, as this information would support the basis for permit conditions and emission limits if air permits are required. For guidance on what types of equipment might require air permits, please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Lastly, if the Lead Agencies decide to adopt the Final IS/MND-EA, please provide South Coast AQMD with a notice of any scheduled public hearing(s).

Thank you for the opportunity to provide comments. South Coast AQMD staff is available to work with the Lead Agencies to address any air quality questions that may arise from this comment letter. Please contact Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

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RVC20414-02

Control Number