



# South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Environmental Impact Report (EIR) for the Water Reclamation Plant  
No. 4 Non-Potable Water Improvements Project (Proposed Project)  
(SCH No: 2023100315)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The Coachella Valley Water District (CVWD) 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 which are organized by topic of concern.

Summary of Proposed Project Information in the Draft EIR

Based on the Draft EIR, Water Reclamation Plant No. 4 (WRP 4) is CVWD provides collection service to approximately 63,000 people in the cities of La Quinta, Mecca, Palm Desert, and Thousand Palms. WRP 4 is not currently producing or delivering recycled water. The Proposed Project would construct tertiary treatment facilities within the existing WRP 4 plant site to enable production of up to 10 million gallons per day (MGD) of non-potable recycled water for irrigation, thereby reducing reliance on groundwater and imported Colorado River water.

Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located as close as 25 feet of the construction site. Based on the Draft EIR, construction activities associated with the Proposed Project would occur at various locations within the WRP 4 site at distances ranging from 260 to 2,000 feet from the nearby sensitive receptor located on 62<sup>nd</sup> Avenue.

Construction of the Proposed Project is anticipated to occur in three phases; Phase 1 starting in 2027, Phase 2 starting in 2030, and Phase 3 starting in 2035. The Proposed Project is located southeast of 62<sup>nd</sup> Avenue on Fillmore Street in Thermal, California, an unincorporated area of Riverside County. The property is bordered by 62<sup>nd</sup> Avenue on the north, 64<sup>th</sup> Avenue on the south, Fillmore Street on the west, and the Coachella Valley Stormwater Channel on the east.

South Coast AQMD Comments

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

If implementation of the Proposed Project would require the use of new stationary and portable sources, including but not limited to emergency generators, fire water pumps, boilers, etc., air

permits from South Coast AQMD will be required. The final CEQA document, Final EIR, should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>1</sup> Rule 203 – Permit to Operate,<sup>2</sup> Rule 401 – Visible Emissions,<sup>3</sup> Rule 402 – Nuisance,<sup>4</sup> Rule 403 – Fugitive Dust,<sup>5</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>6</sup> Rule 1113 – Architectural Coating,<sup>7</sup> Rule 1179 – Publicly Owned Treatment Works Operations,<sup>8</sup> Regulation XIII – New Source Review,<sup>9</sup> Rule 1401 – New Source Review of Toxic Air Contaminants,<sup>10</sup> Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,<sup>11</sup> Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>12</sup> etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD changes from a Commenting Agency to a Responsible Agency under CEQA. In addition, if South Coast AQMD is identified as a Responsible Agency, per CEQA Guidelines Sections 15086, the Lead Agency is required to consult with South Coast AQMD.

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 Guideline 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 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>.

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<sup>1</sup> South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

<sup>2</sup> South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

<sup>3</sup> South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

<sup>4</sup> South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

<sup>5</sup> South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf>

<sup>6</sup> South Coast AQMD. Rule 1110.2 available at: [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

<sup>7</sup> South Coast AQMD. Rule 1113 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

<sup>8</sup> South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

<sup>9</sup> South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>10</sup> South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>11</sup> South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

<sup>12</sup> South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

Conclusion

As set forth in California 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 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 in 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 is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Zoya Banan, PhD., Air Quality Specialist, at [ZBanan@aqmd.gov](mailto:ZBanan@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

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