



South Coast Air Quality Management District

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**Initial Study/Draft Mitigated Negative Declaration (IS/Draft MND) for the
San Antonio Water Company Headquarters Project (Proposed Project)
(SCH No: 2025080639)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The City of Upland 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 IS/Draft MND

Based on the IS/Draft MND, the the Proposed Project involves construction of a new 3,698-square-foot San Antonio Water Company (SAWCO) headquarters and associated improvements, including a 4,066-square-foot maintenance building, maintenance yard, driveway, parking, solar cover, landscaping, citrus grove, and utility upgrades.¹ The headquarters building would provide office space, meeting and conference rooms, a lobby, an archive room, a break room, two Americans with Disabilities Act (ADA)–compliant restrooms, a quiet room, a copy room, and a work area. The maintenance building would include storage space, an outdoor welding area, a motor repair room, electrical rooms, an ADA restroom, a locker room, and a maintenance office/break room. Both buildings would be all-electric (no natural gas), limited to a maximum height of 23 feet, and developed at a floor area ratio (FAR) of 0.7. Approximately 10 employees are anticipated to work at the site.² Site improvements would include a citrus grove buffer along the eastern half of the northern property line, as well as trees and shrubs around the parking areas and headquarters building. Landscaping would total approximately 46,077 square feet. Existing facilities on the parcel include a 1-million-gallon water storage tank (northwest corner), a pump station (southwest corner), and a signal building with tower (southeast corner). These existing facilities would remain. Currently, approximately five SAWCO Operations Department employees use the site daily for equipment and material storage.³ Construction is expected to begin in spring 2025 and conclude by the end of 2026. The project would generate approximately 1,700 tons of roadway debris to be exported and would require import of approximately 900 cubic yards of soil. No natural gas use is anticipated during construction.⁴Based on a review of aerial

¹ IS/Draft MND – Page

²² Appendix A – Page 138.

³ *Ibid.*

⁴ *Ibid.*

photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 90 feet from the project site.⁵

South Coast AQMD Comments

Contradiction in Project Hauling Assumptions

The IS/Draft MND states that excavation for the Project would reach a maximum depth of 4–6 feet below ground surface, disturbing approximately 123,501 square feet of soil. It further indicates that excavated soil would be reused on site and that no import or export of soil would be required (Section 2.2.6 of IS/Draft MND – Demolition and Construction). In contrast, Appendix A – Air Quality and Greenhouse Gas Technical Memorandum states that the Project would require removal of approximately 1,700 tons of roadway debris from the site and the import of approximately 900 cubic yards of soil during construction. These statements directly conflict with one another. Therefore, it is recommended that the Lead Agency to; 1) clarify whether the Project would involve import and/or export of materials; and 2) identify the appropriate landfill location and incorporate the corresponding haul distance into the CalEEMod modeling to accurately estimate hauling emissions.

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, 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,⁶ Rule 203 – Permit to Operate,⁷ Rule 401 – Visible Emissions,⁸ Rule 402 – Nuisance,⁹ Rule 403 – Fugitive Dust,¹⁰ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹¹ Rule 1113 – Architectural Coating,¹² Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹³ Rule 1179 – Publicly Owned Treatment Works Operations,¹⁴ Regulation XIII – New Source Review,¹⁵ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁶ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹⁷ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹⁸ etc. It is important to note that when air permits from South Coast AQMD are required, the role of South Coast AQMD would change 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.

⁵ Appendix A – Page 139.

⁶ South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁷ South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

⁸ South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

⁹ South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹⁰ South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹¹ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹² South Coast AQMD. Rule 1113 available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹³ South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁴ South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

¹⁵ South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁶ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹⁷ South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

¹⁸ South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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.

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>.

Conclusion

The Lead Agency is recommended to revise the CEQA analysis to address the aforementioned comments and provide the necessary evidence to sufficiently support the conclusions reached. If the requested information and analysis are not included in the final CEQA document, either the Final MND or other type of CEQA document, the Lead Agency should provide reasons for not doing so. Pursuant to California Public Resources Code Section 21092.5(b) and CEQA Guidelines Section 15074, prior to approving the Proposed Project, the Lead Agency shall consider the MND for adoption together with any comments received during the public review process and notify each public agency when any public hearings are scheduled. Please provide South Coast AQMD with written responses to all comments contained herein prior to the adoption of the Final MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record to explain why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final MND, 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 Agency to address any air quality questions that may arise from this comment letter. Please contact Jivar Afshar, Air Quality Specialist, at jafshar@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:JA

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