



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 Highland Grove IV (Proposed Project) (SCH #: 2024050835)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. Riverside County is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff have 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, the Proposed Project consists of a General Plan Amendment, Change of Zone, Tentative Tract Map, and Agricultural Preserve Diminishment seeking to develop 206 single-family detached residential units (10,000 square foot lots) on 57.8 acres, one park on 1.9 acres, two detention/water quality basins on 3.3 acres, slopes and open space on 25.0 acres, and internal public roadways on 23.6 acres.¹ Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located 54 feet north of the project site.² Construction of the Proposed Project is anticipated to occur in September 2025 and would last through October 2028.³ The Proposed Project is located on the east of McAllister Street and north of El Sobrante Road in Riverside.⁴

South Coast AQMD Comments

Insufficient Dispersion Modeling and Receptor Coverage

The current analysis appears to rely on South Coast AQMD's Localized Significance Threshold (LST) screening methodology, which is typically intended for project-level assessments with defined site layouts, emission sources, and operational characteristics for sites less than five acres. The Air Quality (AQ) Report does not provide adequate justification for applying this methodology to a broader, programmatic-level analysis⁵, particularly given that the Proposed Project is a General Plan.

¹ Public Review Draft EIR-Highland Grove IV. Page 33.

² *Ibid.* Page 214.

³ *Ibid.* Page 152.

⁴ *Ibid.* Page 33.

⁵ South Coast AQMD LSTs handbook: [Final Localized Significance Threshold Methodology](#)

Appendix B - AQ Report, Section 3.6, indicates that dispersion modeling, AERMOD was used to evaluate onsite NO_x, CO, PM₁₀, and PM_{2.5} impacts during project construction. However, the modeling includes only 11 receptors. This limited receptor network is not sufficient to identify the maximum ground-level concentrations (GLCs) and may underestimate localized air quality impacts from the project.

Under South Coast AQMD's Air Quality Modeling Guidance⁶, when AERMOD is used to assess criteria pollutant impacts:

- A uniform Cartesian receptor grid with spacing of 100 meters or less must be used for all distances within 1 kilometer of the source.
- Discrete receptors must be placed along the ambient air boundary (e.g., property or fenceline boundary) following maximum spacing requirements.
- Receptor placement must be sufficient to capture maximum concentration gradients and potential impacts to surrounding sensitive receptors.

In addition, the modeled GLCs must be combined with appropriate background concentrations and compare to the applicable Ambient Air Quality Standards (AAQS) to determine whether the project would exceed the AAQS.

Therefore, to ensure the analysis complies with South Coast AQMD modeling guidance and CEQA requirements, it is recommended the EIR should be revised to:

- Follow the South Coast AQMD's Modeling Guidance for receptor placement and grid spacing.
- Expand and justify the receptor network to ensure the maximum GLCs are captured.
- Incorporate background concentrations and compare total concentrations to the applicable AAQS.
- Present full dispersion results for all receptor locations.

Use of Outdated AERMET and Meteorological Data in AERMOD Modeling

Appendix B (AQ report) of the Draft EIR indicates that AERMOD version 23132 and AERMET data version 9 were used. However, South Coast AQMD released a newer, approved version of AERMOD-ready MET data files (Version 11) in October 2024.⁷ The updated dataset was developed using the U.S. EPA's AERMET processor Version 22112, along with pre-processors AERMINUTE Version 15272 and AERSURFACE Version 20060.⁸ The U.S. EPA's current

⁶ South Coast AQMD Modeling Guidance for AERMOD: <https://www.aqmd.gov/home/air-quality/meteorological-data/modeling-guidance#Receptor>

⁷ South Coast AQMD AERMOD-Ready MET Data Files available at https://www.aqmd.gov/assets/aermet/AERMET_files_And_HRA_Tool.html

⁸ South Coast AQMD Data for AERMOD available at <https://www.aqmd.gov/home/air-quality/meteorological-data/data-foraermod>

preferred and recommended meteorological data preprocessor for AERMOD, as of the latest release, is AERMET version 24142, released in November 2024.⁹

The use of outdated meteorological data for the analysis contained in the Draft EIR is inconsistent with the U.S. EPA's Guideline on Air Quality Models (40 CFR Part 51, Appendix W)¹⁰ and may have resulted in inaccurate or underestimated health risk estimates. To ensure accuracy and consistency with federal modeling guidelines, the Lead Agency is recommended to re-run the air dispersion modeling using the more recent meteorological data processed by the most recent U.S. EPA-recommended versions of AERMET.

Overlapping Construction and Operational Activities

Even though the Proposed Project consists of approximately a total of 111.6 acre project site over the course of 3-year construction, the Draft EIR does not analyze the scenario of overlapping between the construction and operational activities. Therefore, South Coast AQMD staff recommends that the Lead Agency revise the air quality analysis section to consider the overlapping construction and operation. The estimated overlapped emissions should then be compared to South Coast AQMD's regional air quality CEQA operational thresholds to determine their level of significance, which should be included in the Final EIR. If the overlapped emissions analysis is not included in the Final EIR, the Lead Agency should provide reasons for not having them supported by substantial evidence in the record.

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., one or more air permits from South Coast AQMD will be required. The Final EIR should include a discussion about the potentially applicable South Coast AQMD rules that may be applicable to the Proposed Project. Those rules may include, for example, Rule 201 – Permit to Construct,¹¹ Rule 203 – Permit to Operate,¹² Rule 401 – Visible Emissions,¹³ Rule 402 – Nuisance,¹⁴ Rule 403 – Fugitive Dust,¹⁵ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹⁶ Rule 1113 – Architectural Coatings,¹⁷ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹⁸ Rule 1179 – Publicly Owned Treatment Works Operations,¹⁹ Regulation XIII – New Source Review,²⁰ Rule 1401 – New Source Review of Toxic Air

⁹ U.S. EPA Air Quality Dispersion Modeling - Preferred and Recommended Models available at <https://www.epa.gov/scram/meteorological-processors-and-accessory-programs>

¹⁰ Code of Federal Regulations. Title 40. Part 51. Appendix W available at <https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-51/appendix-Appendix%20W%20to%20Part%2051>

¹¹ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

¹² South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹³ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/r1-401.pdf>

¹⁴ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-402.pdf>

¹⁵ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-iv/rule-403>

¹⁶ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹⁷ South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹⁸ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁹ South Coast AQMD, Rule 1179 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

²⁰ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

Contaminants,²¹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,²² Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,²³ etc. It is important to note if 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.

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 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 Sahar Ghadimi, Air Quality Specialist, at sghadimi@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Planning, Rule Development & Implementation

SW:SG

RVC260310-04

Control Number

²¹ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

²² South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

²³ South Coast AQMD, Rule 1470 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>