



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

ERhee@JCSD.US

Eddie Rhee, Engineering Manager
Jurupa Community Services District
11201 Harrel Street
Jurupa Valley, CA 91752

June 10, 2026

**Initial Study/Mitigated Negative Declaration (IS/MND) for the
JCSD 2020 Water Master Plan and 2020 Wastewater Master Plan Facilities
(Proposed Project) (SCH No: 2026050568)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. Jurupa Community Services District 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 IS/MND

Based on the IS/MND, the Proposed Project consists of the master plan Facilities at both the project-specific level (1200 West Emergency Pump Connection, Granite Hills Booster Pump Station, and Pedley Road Truck Sewer and Water Pipelines Replacement) and the program-level (68th Street Extension, Schleisman I-15 Crossing, and the North Indian Hills Truck Sewer).¹ The details associated with each master plan facility are below.

Project-specific level:

- 1200 West Emergency Pump Connection: the use of a trailer-mounted portable water pump and 12-inch diameter potable water bypass connection piping at or near the intersection of Microlite Drive and Scenic Drive.²
- Granite Hills Booster Pump Station: a potable water pump station in proximity to Granite Hill Drive and Pedley Road, with a water flow rate of 10,000 gallons per minute (gpm) with four operating pumps, one standby pump, and reversible pumping. The pump station will include both underground and above-ground piping with diameters ranging from 12 to 30 inches, a surge tank, and a standby generator.³
- Pedley Road Truck Sewer and Water Pipelines Replacement: replacement of approximately 5,200 feet of an existing 8-inch diameter sewer pipeline with a 12-inch diameter PVC sewer pipeline.⁴

¹ Draft IS/MND. p. 4.

² *Ibid.* p. 6.

³ *Ibid.* p. 9.

⁴ *Ibid.*

Program-level:

- 68th Street Extension: extension of approximately 4,250 linear feet, 18-inch diameter CMLC pipeline.⁵
- Schleisman I-15 Crossing: consists of approximately 24,350 linear feet, 30-inch diameter, CML/CMC potable water transmission pipeline.⁶
- North Indian Hills Truck Sewer: upsizing of approximately 1,000 linear feet of 8-inch diameter pipeline with 10-inch diameter PVC plastic pipeline.⁷

South Coast AQMD Comments

South Coast AQMD Air Permits and Role as a Responsible Agency

Since the Proposed Project would include the use of water pumps and a standby generator, air permits from South Coast AQMD will be required. The Final IS/MND should include a discussion about the details of equipment, such as fuel, rating capacity, etc., and the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,⁸ Rule 203 – Permit to Operate,⁹ Rule 401 – Visible Emissions,¹⁰ Rule 402 – Nuisance,¹¹ Rule 403 – Fugitive Dust,¹² Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹³ Rule 1113 – Architectural Coating, Regulation XIII – New Source Review,¹⁴ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁵ Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹⁶ etc. It is important to note that when air permits from the South Coast AQMD are required, the role of the 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.

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. South Coast AQMD is concerned that the project description and analysis in its current form in the IS/MND is inadequate to be relied upon for this purpose.

⁵ *Ibid.* p. 11.

⁶ *Ibid.*

⁷ *Ibid.* p. 14.

⁸ South Coast AQMD. Rule 201 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁹ South Coast AQMD. Rule 203 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

¹⁰ South Coast AQMD. Rule 401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

¹¹ South Coast AQMD. Rule 402 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹² South Coast AQMD. Rule 403 available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹³ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹⁴ South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁵ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹⁶ South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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 IS/MND 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 IS/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 IS/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 IS/MND. When responding to issues raised in the comments, detailed reasons supported by substantial evidence in the record explaining why specific comments and suggestions are not accepted must be provided. In addition, if the Lead Agency decides to adopt the Final IS/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 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,

Sam Wang

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:DN

RVC260514-06

Control Number