



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Pierce Street Consolidated Water and Sewer Project (Proposed Project) (SCH No: 2026020790)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The Coachella Valley Water District 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 IS/MND

Based on the Draft IS/MND, the Proposed Project consists of installing potable water lines, wastewater collection lines, and a lift station along Pierce Street from Avenue 66 to Avenue 70 to provide municipal water and sewer service to mobile home parks and residences serving 710 residents in 129 dwelling units plus about 100 additional units. Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located in the immediate project vicinity include mobile homes and residences along Avenue 70, Pierce Street, and Ave 69. The construction will occur over a 4-month period and is currently planned for year of 2026-2027. The Proposed Project is located along Pierce Street between Avenue 66 and Avenue 70 in Oasis. The Proposed Project is also within the designated AB 617 Eastern Coachella Valley community.

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, whether a Draft IS/MND or 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,¹ Rule 203 – Permit to Operate,² Rule 401 – Visible Emissions,³ Rule 402 –

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

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

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

Nuisance,⁴ Rule 403 – Fugitive Dust,⁵ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,⁶ Rule 1113 – Architectural Coating,⁷ Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,⁸ Rule 1179 – Publicly Owned Treatment Works Operations,⁹ Regulation XIII – New Source Review,¹⁰ Rule 1401 – New Source Review of Toxic Air Contaminants,¹¹ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹² Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,¹³ 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.

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 Draft IS/MND is inadequate to be relied upon for this purpose.

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>.

Assembly Bill 617 (AB 617) Eastern Coachella Valley (ECV) Community Emission Reductions Plan (CERP)

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

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

⁶ South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

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

⁸ South Coast AQMD. Rule 1166 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

⁹ South Coast AQMD. Rule 1179 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf>

¹⁰ South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹¹ South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹² South Coast AQMD. Rule 1466 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

¹³ South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

The Proposed Project is located in the California Assembly Bill 617 (AB 617) designated community of Eastern Coachella Valley (ECV), which is disproportionately impacted by air pollution from sources such as the Salton Sea, pesticides, fugitive road dust, open burning, illegal dumping, diesel mobile sources, and land use issues. As part of the AB 617 process, South Coast AQMD worked with a Community Steering Committee (CSC) to develop a Community Emission Reductions Plan (CERP) that identifies air quality priorities and related objectives to address those air quality priorities to reduce air pollution in the community. The South Coast AQMD Governing Board adopted the ECV CERP in June, 2021, and CARB approved the ECV CERP in September, 2021.¹ South Coast AQMD recommends that the Lead Agency review the air quality priorities and objectives to reduce air pollution in the ECV community, which are included in Chapter 5 of the ECV CERP, and to ensure the Proposed Project is aligned with the ECV CERP. South Coast AQMD also recommends that the Lead Agency continue working with South Coast AQMD to explore whether additional measures to further reduce emissions can be implemented at the Proposed Project to support implementation of the ECV CERP.

Measures to Further Reduce Construction-Related Emissions

The Proposed Project is in a rural desert environment and is immediately adjacent to sensitive receptors, including mobile homes and residences. While the Lead Agency concludes that air quality impacts would be less than significant, construction activities at the Proposed Project are directly related to several air quality priority concerns identified in the ECV CERP, including the reduction of fugitive dust (PM10) and diesel particulate matter (DPM) emissions, and the reduction of community exposure to localized air pollution. To further reduce construction-related emissions in a disproportionately impacted community, South Coast AQMD staff recommend the following:

- Use zero- or near-zero emission construction equipment where feasible
- Implement enhanced dust control measures (e.g., soil stabilizers, paving unpaved roads) beyond Rule 403 – Fugitive Dust and Rule 403.1 – Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources requirements
- Limit idling of diesel equipment and designate staging activities away from sensitive receptors
- Provide community notifications regarding construction schedules and dust-generating activities

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 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 to explain 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 is 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

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