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Draft Program Environmental Impact Report (PEIR) for the Riverside Facilities Master Plan (Proposed Project) (SCH No.: 2022040268)

South Coast Air Quality Management District (South Coast AQMD) Staff appreciate the opportunity to review the above-mentioned document. The Western Municipal Water District (WMWD) 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 PEIR

Based on the Draft PEIR, the Proposed Project consists of implementing an integrated master plan evaluating and improving the WMWD's potable water, recycled water, and wastewater systems within the Riverside Retail Service Area (104 square miles), including upsizing existing pipelines, installing new pipelines, constructing new storage tanks, new booster pump stations, capacity upgrades at existing lift stations, and potential expansion of the Western Water Recycling Facility (WWRF) with priority and near-term projects before 2030 and long-term projects from 2030 to 2050. The Proposed Project is located in the City of Riverside and unincorporated Riverside County within WMWD's Riverside Retail Service Area.

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 PEIR 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,[1] Rule 203 – Permit to Operate,[2] Rule 401 – Visible Emissions,[3] Rule 402 – Nuisance,[4] Rule 403 – Fugitive Dust,[5]

[1] South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[2] South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[3] South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[4] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[5] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403

Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[6] Rule 1113 – Architectural Coatings,[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 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.

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.

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 PEIR. 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 PEIR. 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

[6] South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[7] South Coast AQMD, Rule 1113 is available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[8] South Coast AQMD, Rule 1166 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf
[9] South Coast AQMD, Rule 1179 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1179.pdf
[10] South Coast AQMD, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[11] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[12] South Coast AQMD, Rule 1466 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf
[13] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

South Coast AQMD staff are available to work with the Lead Agency to ensure that impacts to air quality, GHG emissions, and health risk from the Proposed Project are accurately evaluated and mitigated to the greatest extent possible. Please contact Sahar Ghadimi, Ph.D., Air Quality Specialist, at sghadimi@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

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