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Draft Initial Study/Mitigated Negative Declaration (IS/MND) for Scott Road Regional Lift Station Sewer Conveyance Project (Proposed Project) (SCH No.: 2026100615)

South Coast Air Quality Management District (South Coast AQMD) Staff appreciate the opportunity to review the above-mentioned document. The Eastern Municipal Water District (EMWD) 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 IS/MND

Based on the Draft IS/MND, the Proposed Project is designed to provide adequate wastewater conveyance capacity to accommodate planned residential development (such as the Ardis Ranch and Frederick's Ridge developments) and future regional growth in unincorporated Riverside County, as the existing Wickerd Road Lift Station (WRLS) lacks sufficient capacity.

The Proposed Scott Road Regional Lift Station (SRRLS) Sewer Conveyance Project is located east of Interstate 215 (I-215), south of State Route 74 (SR 74), and west of SR 79. The site encompasses a 1.76-acre parcel at the southeastern corner of Scott Road and Leon Road, where the proposed SRRLS would be constructed, a 0.23-acre parcel where the existing WRLS is located, as well as roadway right-of-way (ROW) on the following segments: Beeler Road north of Scott Road; Scott Road between Leon Road and Beeler Road; Leon Road between Scott Road and Wickerd Road; Wickerd Road between the existing WRLS and Eucalyptus Road; and Eucalyptus Road between Wickerd Road and Craig Avenue.[1]

The closest sensitive receptors to the pipeline construction activities include single family homes along the roadways where pipeline alignments would be placed (i.e., Scott Road, Leon Road, Wickerd Road, and Garbani Road).[2] Also, based on a review of aerial photographs, South Coast AQMD Staff identified a residence that appears to be immediately adjucentto the southern boundary of the proposed SRRLS site.

[1] Scott Road Regional Lift Station Sewer Conveyance Project, Initial Study/Mitigated Negative Declaration. *p*. 5.
[2] *Ibid. p*. 28.

Construction of the pipeline construction is anticipated to occur over the period of 18 months[3] starting in January 2027[4]. Construction of the SRRLS is anticipated to last approximately six months.

South Coast AQMD Comments

Emergency Backup Generator – Operational Air Quality Impacts

The Draft IS/MND identifies installation of an emergency backup generator at the proposed SRRLS site, with a capacity of 500 kilowatts (kW) during the initial and interim phase and 1,250 kW at ultimate buildout.[5] However, the Draft IS/MND does not provide sufficient information regarding the proposed generator's engine type, fuel, or emissions characteristics. The Air Quality analysis also concludes that operational emissions would not substantially increase over existing conditions based on the assumption that the existing WRLS has a similar type of generator.[6] However, without supporting information demonstrating that the existing and proposed generators are comparable in terms of engine specifications, fuel type, emissions, and operating conditions, this conclusion is difficult to verify.

Furthermore, relocating the generator to a different site may affect different sensitive receptors and result in different exposure conditions. The Draft IS/MND identifies the nearest sensitive receptor as a residence approximately 240 feet east of the proposed SRRLS site.[7] However, South Coast AQMD Staff's review of aerial imagery indicates a residence may be located immediately adjacent to the southern project boundary.

Therefore, it is recommended that the Lead Agency clarifies whether this nearby residence was considered in the analysis and verify the locations and distance of the nearest sensitive receptors. It is also recommended that the Lead Agency provides additional specifications for the proposed generator, including its engine manufacturer and model, fuel type, rated horsepower, applicable emission standards, and anticipated annual operating hours for emergency use and routine testing and maintenance. Based on this information, the Lead Agency should provide a supported comparison of the emissions from the existing WRLS generator and the proposed SRRLS generator, and reassess potential operational air quality impacts at nearby sensitive receptors, as appropriate. Reliance on future South Coast AQMD permitting alone would not substitute for an adequate evaluation of the Proposed Project's potential environmental impacts under CEQA.

Construction Vendor Delivery and Haul Emissions During Pipeline Installation Phases

The Draft IS/MND's construction emissions analysis appears to assume zero vendor and haul trips during the pipeline installation phases[8], despite the proposed construction of approximately 12,775 linear feet of gravity sewer and 9,000 linear feet of force main sewer[9]. Given the scope of the improvements, construction would reasonably be expected to involve deliveries of pipeline

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3 *Ibid. p*. 9.
4 Scott Road Regional Lift Station Sewer Conveyance Project, Initial Study/Mitigated Negative Declaration, Appendices. *p*. 6.
5 Scott Road Regional Lift Station Sewer Conveyance Project, Initial Study/Mitigated Negative Declaration. *p*. 6.
6 *Ibid. p*. 28.
7 *Ibid. p*. 30.
8 Scott Road Regional Lift Station Sewer Conveyance Project, Initial Study/Mitigated Negative Declaration, Appendices. *pp*. 22-42
9 Scott Road Regional Lift Station Sewer Conveyance Project, Initial Study/Mitigated Negative Declaration. *p*. 5.

materials, as well as potential hauling of excess excavated soil and deliveries of imported bedding and backfill materials. Although the reported construction emissions are below the applicable South Coast AQMD significance thresholds, the emissions analysis should adequately account for reasonably foreseeable construction-related vehicle activity and be supported by realistic and documented assumptions. Therefore, clarification is warranted regarding how these activities are accounted for in the CalEEMod assumptions, particularly since Sections 4.6 (Energy) and 4.17 (Transportation) acknowledge construction-related vendor and hauling activities.[10]

Therefore, it is recommended that the Lead Agency clarifies the basis for assuming zero vendor and haul trips during the pipeline installation phases and, as appropriate, revise the CalEEMod assumptions to incorporate reasonable project-specific estimates of construction-related deliveries and hauling activities. Construction emissions should then be recalculated to determine whether the revised estimates would affect the Proposed Project's air quality impact conclusions.

South Coast AQMD Air Permits and Role as a Responsible Agency

Since the Proposed Project would include installation and operation of an emergency backup generator, air permits from South Coast AQMD will be required. The Final MND 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] Regulation XIII – New Source Review,[17] Rule 1401 – New Source Review of Toxic Air Contaminants,[18] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[19] 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

[10] *Ibid. pp*. 55 & 99.
[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/rule-iv/rule-401.pdf
[14] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[15] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-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, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[18] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[19] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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

It is recommended that the Lead Agency revises 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 explaining 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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Zoya Banan, PhD., Air Quality Specialist, at ZBanan@aqmd.gov or me at SWang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

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