South Coast
Air Quality Management District
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October 29, 2026

SENT VIA E-MAIL:
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Draft Initial Study/Mitigated Negative Declaration (IS/MND) for Alessandro Ponds Optimization Phase II Project (Proposed Project) (SCH No.: 2026091193)

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

Based on the Draft IS/MND, the Proposed Project is designed to increase the recycled water storage capacity of the Alessandro Ponds in the City of San Jacinto from approximately 172 to 369 acre-feet through pond excavation, berm raising, and soil-cement slope stabilization. The Proposed Project consists of following:

- **Ponds Deepening**: Three of the four existing retention ponds (Ponds 1, 2, and 3) will be modified. The bottom of Pond 1 will be excavated approximately 1 foot deeper, while Ponds 2 and 3 will be excavated 6 to 9 feet deeper.
- **Berm Raising and Slope Stabilization**: Soil excavated from the pond bottoms will be used to raise the surrounding berms by approximately three to five feet.
- **Expansion of Pond 3**: Pond 3 will be expanded approximately 100 feet to the northeast toward Ponds 1 and 2, which requires the removal of an existing soil stockpile.
- **Soil Export**: Construction will require the off-site export of approximately 120,400 cubic yards of excess excavated soil.
- **Infrastructure and Utility Relocation**: Existing underground pipelines, recycled water lines, security fence segments, and supporting infrastructure will be relocated or replaced as necessary.

The Proposed Project is located on north of West Ramona Expressway, near Vernon Avenue and Alessandro Avenue North, with undeveloped lands located to its east and west bounries. The nearest sensitive receptors include residences which are located approximately 0.24 mile west of Pond 3 and Rose-Salgado Elementary School which is located approximately 0.27 mile south of Pond 3. Construction of the Proposed Project is anticipated to occur over a period of 18 months starting in January 2027.

South Coast AQMD Comments

Inconsistent Construction Truck Trip and Haul Calculations

The Project description appears to contain an inconsistency in the calculation of construction haul trips. The document states that grading would require the importation of approximately 120,400 cubic yards (CY) of soil[1] and assumes a standard haul truck capacity of 16 cubic yards. Based on these assumptions, approximately 7,525 truckloads would be required (120,400 CY ÷ 16 CY/truck). Assuming 260 working days, this equates to approximately 29 loaded truck trips per day, or approximately 58 one-way truck movements per day if both the inbound and outbound movements are counted.

However, the document states that exporting the 120,400 cubic yards would require 20 round trips (40 one-way) hauling truck trips per day. That number does not appear to be supported by the stated assumptions.[2]

Therefore, Lead Agency is suggested to review and clarify this discrepancy and ensure that the construction traffic and Vehicle Miles Traveled (VMT) analysis is based on accurate and consistent calculations.

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 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,[3] Rule 203 – Permit to Operate,[4] Rule 401 – Visible Emissions,[5] Rule 402 – Nuisance,[6] Rule 403 – Fugitive Dust,[7] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[8] Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,[9] 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

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1 *Ibid.* Page 127.
2 Initial Study/Mitigated Negative Declaration for Alessandro Ponds Optimization Phase II, *p*. 10.
3 South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
4 South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
5 South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
6 South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
7 South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
8 South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
9 South Coast AQMD, Rule 1166 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf

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 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.

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 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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RVC261001-09
Control Number