



South Coast Air Quality Management District

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SENT VIA E-MAIL:

August 30, 2024

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Draft Environmental Impact Report (EIR) for the Proposed Valencia Water Reclamation Plant Middle Section Retaining Wall Ground Improvement Project (Proposed Project) (SCH No. 2023110644)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to review the above-mentioned document. The Santa Clarita Valley Sanitation District (SCVSD) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD Staff (Staff) has provided a brief summary of the project information and prepared the following comments.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on information provided in the Draft EIR, the Proposed Project consists primarily of improvements to a retaining wall at the Valencia Water Reclamation Plant (VWRP) located at 28185 The Old Road, Valencia in unincorporated Los Angeles County, California.¹ The VWRP, whose western boundary is adjacent to the Santa Clara River (SCR), serves the City of Santa Clarita as well as a portion of unincorporated Los Angeles County.² Recent studies identified that in the event of a major flood and earthquake, the retaining wall along the western boundary of the VWRP may be undermined, specifically a 1,000 foot-long middle section of the retaining wall.³ Proposed Project improvements to aid in the long-term protection of this section of the retaining wall consist of: 1) installing an underground retaining wall structure to reinforce the existing middle section retaining wall; 2) upgrades to two existing concrete pipe discharge structures; and 3) addition of riprap along the southern portion of the VWRP wall.⁴ Construction, which would effect approximately 3.26 acres just outside of the VWRP, may begin as early as the 4th quarter of 2025 and last approximately 23 months.^{5, 6}

South Coast AQMD Staff's Comments

South Coast AQMD Air Permits and Role as a Responsible Agency

The Draft EIR states that during the construction phase of the Proposed Project, cement would be imported and mixed onsite at a cement batch plant.⁷ The DEIR does not specifically state,

¹ Draft EIR for the VWRP Middle Section Retaining Wall Ground Improvement Project (DEIR). Project Description, p. 2-1.

² *Ibid.* Executive Summary, p. ES-1 & ES-2.

³ *Ibid.* Project Description, p. 2-1.

⁴ *Ibid.* Executive Summary, p. ES-2.

⁵ *Ibid.*

⁶ *Ibid.* Air Quality, p. 3.1-22.

⁷ *Ibid.* Project Description, p. 2-12.

though, if a South Coast AQMD permit will be needed for the cement batch plant.^{8, 9} If implementation of the Proposed Project would require the use of new stationary sources, including but not limited to cement batch plants, emergency generators, fire water pumps, boilers, etc., air permits from South Coast AQMD will be required and 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 Section 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 evaluating the applications for air permits. For these reasons, the Final EIR should include a discussion about any new stationary equipment requiring South Coast AQMD air permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project.

The Final EIR should also include calculations and analyses for construction and operation emissions for any new stationary sources, as this information will also 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 applications for new air permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://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 EIR. 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 EIR. 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 evidence in the record to explain why specific comments and suggestions are not accepted must be provided.

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 Evelyn Aguilar, Air Quality Specialist, at eaguilar@aqmd.gov should you have any questions.

Sincerely,

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EA:SW

LAC240717-10

Control Number

⁸ *Ibid.* Appendix A: Initial Study. Environmental Checklist, p. 3.

⁹ South Coast AQMD Permits, Portable Equipment Units. Access here: <https://www.aqmd.gov/home/permits/equipment-registration/perp/portable-equipment-units>