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Draft Environmental Impact Report (EIR) for the Woodcrest Retail Center Project (Proposed Project) (SCH No: 2025060993)

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The County of Riverside 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 EIR

Based on the Draft EIR, the Proposed Project consists of developing approximately 61,020 square feet of retail and restaurant on 9.42 acres within the Lake Mathews/Woodcrest area of Riverside County.[1] The Proposed Project could be developed under two scenarios: Base development scenario and Parcel 1 Option.[2] Both of the scenarios include a mix of retail commercial uses, including a grocery store, shops, and fast-food drive-through uses.[3] However, the Base development scenario would include a gas station with an annual throughput of approximately 4.6 million gallons,[4] while Parcel 1 Option would be developed with retail/restaurant uses.[5] Based on a review of aerial imagery, the nearest sensitive receptors (e.g., residential uses) are within 130 feet of the Proposed Project site. The opening year is 2027.[6]

South Coast AQMD Comments

South Coast AQMD Air Permits, Role as a Responsible Agency

Since the Proposed Project would include a gas station with an annual throughput of approximately 4.6 million gallons, air permits from South Coast AQMD will be required. The Final EIR 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

[1] Draft EIR. p. 3-1.
[2] *Ibid*.
[3] *Ibid*.
[4] *Ibid*. p. 4.3-34.
[5] *Ibid*. p. 3-15.
[6] *Ibid*. p. 3-35.

Construct,[7] Rule 203 – Permit to Operate,[8] Rule 401 – Visible Emissions,[9] Rule 402 – Nuisance,[10] Rule 403 – Fugitive Dust,[11] Rule 461 – Gasoline Transfer and Dispensing,[12] Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,[13] Rule 1113 – Architectural Coatings,[14] Regulation XIII – New Source Review,[15] Rule 1401 – New Source Review of Toxic Air Contaminants,[16] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[17] etc. Since air permits from South Coast AQMD will be required for the Proposed Project, the role of South Coast AQMD has changed from a Commenting Agency to a Responsible Agency under CEQA. In addition, the Lead Agency is required to consult with South Coast AQMD as a Responsible Agency per CEQA Guidelines Section 15086.

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 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

As set forth in Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(a) and (b), the Lead Agency shall evaluate comments from public agencies on environmental issues and prepare a written response at least 10 days prior to certifying the Final EIR. As such, please

[7] South Coast AQMD, Rule 201 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[8] South Coast AQMD, Rule 203 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[9] South Coast AQMD, Rule 401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[10] South Coast AQMD, Rule 402 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[11] South Coast AQMD, Rule 403 is available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[12] South Coast AQMD, Rule 461 is available at https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-461.pdf
[13] South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[14] South Coast AQMD, Rule 1113 is available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[15] South Coast AQMD, Regulation XIII is available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[16] South Coast AQMD, Rule 1401 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[17] South Coast AQMD, Rule 1470 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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 are available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact Danica Nguyen, Air Quality Specialist, at dnguyen1@aqmd.gov or me at swang1@aqmd.gov should you have any questions.

Sincerely,

Sam Wang

Sam Wang
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Planning, Rule Development & Implementation

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