



South Coast Air Quality Management District

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SENT VIA E-MAIL:

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**Draft Initial Study/Mitigated Negative Declaration (IS/MND) for
Meadowbrook Market Commercial Project (Proposed Project)
(SCH No: 2026090115)**

South Coast Air Quality Management District (South Coast AQMD) Staff appreciate the opportunity to review the above-mentioned document. The Riverside County Planning Department 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

The Proposed Project is a commercial development to transform an approximately 3.62 acres site, which is currently vacant but disturbed (containing remnants of former structures and agricultural uses)¹, into a neighborhood retail hub featuring a market, fueling station, drive-through restaurant, and car wash. Based on the Draft EIR, the Proposed Project consists of five main commercial uses^{2,3}:

1. Meadowbrook Market: a 7,220 – 7,393 square-feet (s.f.) full-service market featuring a Type 21 Alcoholic Beverage Control license), with a total of 49 parking spaces and a loading area
2. Convenience Store and Fueling Station: a 323 s.f. convenience store adjacent an 8-position with 16-pump fueling canopy, accompanied by 19 Electric Vehicle (EV) charging spaces and 6 future-ready EV spaces
3. Quick-Service Restaurant (QSR): a 1,993 – 2,076 s.f. restaurant with outdoor patio seating and a drive-through lane with stacking capacity for at least six vehicles, with a total of seven parking spaces
4. Automated Car Wash: a 3,080 s.f. drive-through car wash with an equipment room and 17 vacuum stalls
5. Multi-Tenant Retail Building: a 9,000 square-foot building intended for neighborhood retail and service uses, with a total of 30 parking spaces
6. Total of 132 surface parking spaces

¹ Meadowbrook Market Commercial Project Draft IS/MND, Appendix A – Air Quality-Greenhouse Gas Study, p. 1.

² Meadowbrook Market Commercial Project Draft IS/MND, p. 1-2.

³ Meadowbrook Market Commercial Project Draft IS/MND, Appendix A – Air Quality-Greenhouse Gas Study, p. 1-2.

The Proposed Project is located at 27410 Highway 74, at the southeast corner of Highway 74 and Greenwald Avenue. The nearest sensitive receptor is a single-family residence located 90 feet (27 meters) to the south of the southern property line. There are also single-family residences located east of the site across Greenwald Avenue (175 feet) and west of the site across SR-74 (400 feet).⁴ Construction of the Proposed Project is anticipated to occur over 12 months starting in early 2027.

South Coast AQMD Comments

South Coast AQMD Air Permits and Role as a Responsible Agency

Since the Proposed Project includes a gasoline service station with 8 fueling positions, the facility would require a South Coast AQMD permit.⁵ Additionally, 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 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 Construct,⁶ Rule 203 – Permit to Operate,⁷ Rule 401 – Visible Emissions,⁸ Rule 402 – Nuisance,⁹ Rule 403 – Fugitive Dust,¹⁰ Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,¹¹ Rule 1113 – Architectural Coatings,¹² Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil,¹³ Regulation XIII – New Source Review,¹⁴ Rule 1401 – New Source Review of Toxic Air Contaminants,¹⁵ Rule 1466 – Control of Particulate Emissions from Soils with Toxic Air Contaminants,¹⁶ 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

⁴ *Ibid.* p. 15.

⁵ South Coast AQMD Guidance for performing a gasoline dispensing station health risk assessment can be found here: <https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/iws-facilities/iws-gas-station>

⁶ South Coast AQMD, Rule 201 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>

⁷ South Coast AQMD, Rule 203 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>

⁸ South Coast AQMD, Rule 401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf>

⁹ South Coast AQMD, Rule 402 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf>

¹⁰ South Coast AQMD, Rule 403 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403>

¹¹ South Coast AQMD, Rule 1110.2 is available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf

¹² South Coast AQMD, Rule 1113 is available at <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>

¹³ South Coast AQMD, Rule 1166 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf>

¹⁴ South Coast AQMD, Regulation XIII is available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

¹⁵ South Coast AQMD, Rule 1401 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

¹⁶ South Coast AQMD, Rule 1466 is available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1466.pdf>

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 IS/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 IS/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, Ph.D., 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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Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:ZB

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