



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

[environmental@dgs.ca.gov](mailto:environmental@dgs.ca.gov)

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Stephanie Coleman, Senior Environmental Planner  
The California Department of Forestry and Fire Protection (CAL FIRE)  
107 3<sup>rd</sup> Street, 4<sup>th</sup> Floor  
West Sacramento, CA 95605

**Draft Focused Environmental Impact Report (EIR) for the  
Hemet-Ryan Air Attack Base Replacement Project (Proposed Project)  
(SCH No.: 2025111100)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to review the above-mentioned document. The CAL FIRE is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. To provide context, South Coast AQMD staff has 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 Focused EIR

Based on the Draft Focused EIR, the Proposed Project consists of replacing the existing Hemet-Ryan Air Attack Base facilities with a modern fire-response base on 15.25 acres by: 1) constructing a two-story air operations building, landing pads and retardant loading pits, a 32-bed barracks/mess hall, a helicopter/OV-10 hangar, two aircraft storage canopies, a helicopter training tower, a fire retardant mixing station, a vehicle storage building, and a generator/electrical yard; 2) demolishing existing outdated structures; and 3) installing new sewer connections, fencing, paving, landscaping, and associated utilities.<sup>1</sup> Based on a review of aerial photographs, South Coast AQMD staff found that the nearest sensitive receptor (e.g., residential development) is located approximately 400 feet south of the project boundary.<sup>2</sup> Construction of the Proposed Project is anticipated to occur in May 2028, be completed by March 2030, and be conducted in one phase.<sup>3</sup> The Proposed Project is located at 4710 Walden Weaver Road in Hemet.<sup>4</sup>

South Coast AQMD Comments

*South Coast AQMD Air Permits and Role as a Responsible Agency*

If implementation of the Proposed Project requires the use of new stationary and portable sources associated with operation of the air operations building, the two emergency generators, retardant mixing station, aircraft support equipment, fire-response facilities, or other similar equipment, air

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<sup>1</sup> Focused Environmental Impact Report. Page 9.

<sup>2</sup> *Ibid.* Page 139.

<sup>3</sup> *Ibid.* Page 142.

<sup>4</sup> *Ibid.* Page 110.

permits from South Coast AQMD may be required. Based on the Project Description in the Draft Focus EIR, the Project would include two 408 horsepower (hp) diesel emergency generators. This analysis assumes that each emergency generator would operate up to 50 hours per year for testing and maintenance. Based on the size and type of the proposed emergency generators, South Coast AQMD permits would be required prior to operation.<sup>5</sup> The final CEQA document should include a discussion about the potentially applicable rules that the Proposed Project needs to comply with. Those rules may include, for example, Rule 201 – Permit to Construct,<sup>6</sup> Rule 203 – Permit to Operate,<sup>7</sup> Rule 401 – Visible Emissions,<sup>8</sup> Rule 402 – Nuisance,<sup>9</sup> Rule 403 – Fugitive Dust,<sup>10</sup> Rule 1110.2 – Emissions from Gaseous and Liquid Fueled Engines,<sup>11</sup> Rule 1113 – Architectural Coating,<sup>12</sup> Regulation XIII – New Source Review,<sup>13</sup> Rule 1401 – New Source Review of Toxic Air Contaminants,<sup>14</sup> Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,<sup>15</sup> etc. It is important to note that when 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 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 Draft Focused EIR is inadequate to be relied upon for this purpose.

For these reasons, the final CEQA document should be revised to include a discussion of any new stationary and portable equipment associated with operation of the Proposed Project, including emergency generators, the retardant mixing station, and other combustion-related equipment that may require South Coast AQMD air permits. The final CEQA document should also evaluate the associated air quality and greenhouse gas impacts and identify South Coast AQMD as a Responsible Agency for the Proposed Project, as this information may be relied upon to establish permit conditions and emission limits for any required air permit(s). Please

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<sup>5</sup> *Ibid.* Page 144.

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

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

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

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

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

<sup>11</sup> South Coast AQMD. Rule 1110.2 available at: [https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110\\_2.pdf](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf)

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

<sup>13</sup> South Coast AQMD. Regulation XIII available at: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii>

<sup>14</sup> South Coast AQMD. Rule 1401 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf>

<sup>15</sup> South Coast AQMD. Rule 1470 available at: <https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf>

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>.

*Health Risk Assessment (HRA) during Project Operation*

CEQA Guidelines Sections 15126.2 and 15126.4 require a description of the significant environmental effects, significant environmental effects that cannot be avoided, significant irreversible environmental changes, growth-inducing impacts, and mitigation measures proposed to minimize the significant adverse impacts. An impact is considered significant under CEQA if it leads to a "substantial, or potentially substantial, adverse change in the environment."

In addition to the air quality impacts from the criteria pollutants and greenhouse gases, the adverse human health risk impacts associated with increased emissions of toxic air contaminants (TACs) from all sources, including, but not limited to, reasonably and foreseeable permitted stationary and portable sources, mobile sources, and other emission sources, during the operational phase must be appropriately evaluated using qualitative and/or quantitative approaches to determine whether potentially substantial adverse impacts may occur.

However, the Draft Focused EIR for the Proposed Project does not include a comprehensive assessment of human health risks associated with TAC emissions from stationary sources (including the two emergency generators), portable sources, and mobile sources during the operational phase. While the criteria pollutant emissions from the two emergency diesel generators were included in the CalEEMod modeling and their associated air quality impacts were evaluated in the Draft Focused EIR, the potential cancer and non-cancer health risk impacts from diesel particulate matter emissions generated by these engines were not evaluated through an operational Health Risk Assessment (HRA). As a result, the potential human health risk impacts associated with the Proposed Project have not been fully characterized. The CEQA document should therefore be revised to include a detailed, source-specific HRA consistent with South Coast AQMD guidance, rather than relying solely on aggregated operational emissions.

As noted earlier in this letter, the aerial maps indicate that the nearest off-site sensitive receptor, a residential area, is located adjacent to or within 400 feet south of the Proposed Project site. As such, the Lead Agency is recommended to conduct an operational Health Risk Assessment (HRA) that evaluates emissions from aircraft support vehicles, maintenance vehicles, employee vehicles, delivery trucks, firefighting support equipment, and diesel-powered stationary and portable sources under reasonably foreseeable operating conditions.

An operational HRA is necessary to determine the potential cancer, chronic, and acute health risk impacts associated with the Proposed Project on off-site sensitive receptors and workers. South Coast AQMD has developed and adopted Air Quality Significance Thresholds for TACs<sup>16</sup> to assist lead agencies in determining whether a project would result in potentially significant cancer, chronic, or acute health risk impacts under CEQA. The Proposed Project's health risk

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<sup>16</sup> South Coast AQMD Air Quality Significance Thresholds. <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

impacts and the conclusions regarding significance findings should be disclosed in the revised CEQA document.

### 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 Focus 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 Focus 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 Sahar Ghadimi, Air Quality Specialist, at [sghadimi@aqmd.gov](mailto:sghadimi@aqmd.gov) should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang

Program Supervisor, CEQA IGR

Planning, Rule Development & Implementation

SW:SG

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