



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

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SENT VIA ELECTRONIC MAIL

September 10, 2025

Lillian Dugan
NEPA Program Manager
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RE: ENVIRONMENTAL ASSESSMENT FOR DRAFT ENVIRONMENTAL
ASSESSMENT FOR PERMANENT SPECIAL USE AIRSPACE ESTABLISHMENT AND
MODIFICATIONS AT MARINE CORPS AIR GROUND COMBAT CENTER,
TWENTYNINE PALMS, CA, DATED AUGUST 4, 2025, STATE CLEARINGHOUSE
NUMBER [2025080099](#)

Dear Lillian Dungan:

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Assessment for Permanent Special Use Airspace Establishment and Modifications at Marine Corps Air Ground Combat Center, Twentynine Palms, CA (Project). The Draft Environmental Assessment (EA) analyzes potential impacts of establishing new and modifying existing Special Use Airspace areas above and adjacent to Marine Air Ground Task Force Training Command, Marine Corps Air Ground Combat Center (Base), Twentynine Palms, California. The proposed changes include modifications to lateral boundaries, component sectors, and/or altitude limits.

DTSC is overseeing the implementation of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) at the Base under the Defense Environmental Restoration Program Agreement with the State of California. Based on the EA, "Under the Proposed Action, current aircraft operations at the Combat Center would spread out across existing Special Use Airspace (SUA) and expand into the newly established/modified Restricted Areas (RAs), Military Operations Areas, and Air Route Traffic Control Centers. Overall, the types of training would be the same as

analyzed in the 2012 Final Environmental Impact Statement (EIS). Additionally, the Proposed Action accounts for changes in aircraft use that includes the transition from the FA-18 to the F-35 (with no change in sorties for these groups); and additional KC-130, Joint Aerial Refueling, and Unmanned Aerial Systems sorties. There would be no change to the remaining number of annual sorties that currently occur in existing Combat Center airspace, that is, aircraft would continue to train but would now spread out to use the existing and newly established/modified airspace under the Proposed Action.” DTSC recommends and requests consideration of the following comments:

1. The EA mostly focused on the airspace safety for military and civilian aircraft. The number of annual airspace sorties is estimated to increase by 1,739. Based on the EA, the proposed Action would not affect solid waste/hazardous materials and waste because, it “would be entirely airspace based and would not involve any activities using or creating solid or hazardous materials and waste. The changes to Restricted Areas (RAs) between the 2012 Final EIS and the proposed R-2509 in this EA would not affect how or where air-to-ground ordnance is delivered. Therefore, there would be no impacts associated with hazardous materials and wastes as a result of the No-Action Alternative or Proposed Action.”
The air quality assessment included in Appendix H, training emissions are expected to increase because of Preferred Alternative. The increase is estimated at 237,707 tons per year for carbon dioxide from the current 181,419 tons per year. The increase in carbon dioxide emissions is 20.59% per year. Based on the increase in emissions, there is an expectation of a proportional increase in fuel or hazardous material use, storage and management at the Base. Likewise, one should expect increased construction at the Base to accommodate an increase in fuel use/storage and aircraft maintenance. New aircraft may require redesigned or new maintenance facilities construction. The increase in hazardous materials use and hazardous waste generation from maintenance activities have not been evaluated. Most historical restoration sites at the Base that required cleanup under the CERCLA were from hazardous material use, storage, management, and aircraft maintenance activities. DTSC disagrees there will be no impacts associated with hazardous materials and waste as a result of the Proposed Action.
2. Section 4.2, Cumulative Impacts, addresses potential cumulative impacts of the No-Action Alternative or Proposed Action (Alternatives 1 or 2) in conjunction with the cumulative projects for each resource discussed in this EA. It states that the EA considered the impacts from all ongoing training operations, even though there are no proposed changes to other elements of ongoing training operations (i.e., ground-based training or use of ordnance). However, the increase in hazardous

materials use and hazardous waste management from maintenance activities to accommodate increased aircraft use training have not been evaluated as part of the cumulative impact's evaluation. Please elaborate if the expansion of the current aircraft operations requires construction of a new air traffic control tower and support operations. If it does, the expansion should be evaluated as part of Cumulative Impacts.

DTSC would like to thank you for the opportunity to comment on the Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions regarding these comments, please contact us via our [CEQA Review email](#).

Sincerely,



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