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**FINAL**

# FOCUSED ENVIRONMENTAL IMPACT REPORT

## HEMET-RYAN AIR ATTACK BASE REPLACEMENT PROJECT

## HEMET, CALIFORNIA

LSA

September 2026

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**FINAL**

# FOCUSED ENVIRONMENTAL IMPACT REPORT

## HEMET-RYAN AIR ATTACK BASE REPLACEMENT PROJECT

## HEMET, RIVERSIDE COUNTY CALIFORNIA

*Prepared for*:

Department of General Services
707 3rd Street, 4th Floor
West Sacramento, California 95605

*On Behalf of the Lead Agency*:

California Department of Forestry and Fire Protection
1416 9th Street
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Project No. 20241779.23

LSA

September 2026

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California Department of Forestry and Fire Protection

# APPROVAL OF THE HEMET-RYAN AIR ATTACK BASE REPLACEMENT PROJECT

As Director of the California Department Forestry and Fire Protection (CAL FIRE), the lead agency for the Hemet-Ryan Air Attack Base (HRAAB) Replacement Project (Project), I hereby make the following findings on this Project:

CAL FIRE is approving the Project. The Project proposes to replace the existing HRAAB facilities and construct a new, modern HRAAB facility that would allow the base to continue to provide high-quality fire protection and emergency response services. The Project would result in improved fueling operations; improved flight capability and improved response time by updating aircraft and aircraft pads and ancillary features; and replacing administrative and support uses. The Project would be developed on approximately 15.25 acres in the south-central portion of the airport, portions of which are currently operating as a helitack base. The Project includes construction of a two-story air operations building with a control room; landing pads and fire retardant loading pits; a 32-bed barracks and mess hall to replace the existing modular units; a combined helicopter/OV-10 hangar; two aircraft storage canopies; a helicopter training tower equipped with a hoist system for rappelling training; a fire retardant mixing station; a vehicle storage building for the protection and storage of firefighting equipment; and a generator yard/electrical building.

CAL FIRE has certified that the Final Environmental Impact Report (EIR) for the Project (State Clearinghouse Number 2025111100) has been completed in compliance with Section 21080 et.al of the California Environmental Quality Act (CEQA). CAL FIRE has reviewed and considered the information contained in the Final EIR for the Project. After consideration of the Final EIR, the Director has determined to approve the proposed Project.

CAL FIRE has reviewed the Findings and the Statement of Overriding Considerations for the Project. The Findings and the Statement of Overriding Considerations are hereby approved and adopted by CAL FIRE.

In accordance with Section 21081.6 of CEQA, the Mitigation Monitoring and Reporting Program for the Project (attached) is hereby approved and adopted.

Upon consideration of the Final EIR, the Environmental Findings, and the Statement of Overriding Considerations, and in accordance with Section 15092 of the CEQA Guidelines, I hereby approved the Hemet-Ryan Air Attack Base Replacement Project. CAL FIRE hereby commits to carrying out the mitigation measures set forth in the Findings and the Mitigation Monitoring and Reporting Program. The Notice of Determination (attached) has been prepared in accordance with Section 15094 of the CEQA Guidelines. CAL FIRE staff is directed to arrange for the filing of the Notice of Determination.

DocuSigned by:
John Melvin
6569EF653A04422...

9/30/2026

John Melvin, Assistant Deputy Director
Resource Protection and Improvement
California Department Forestry and Fire Protection

Date

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California Department of Forestry and Fire Protection

# CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE HEMET-RYAN ATTACK AIR BASE REPLACEMENT PROJECT

The Hemet-Ryan Air Attack Base Replacement Project (Project) (State Clearinghouse Number 2025111100) includes the replacement of the existing Hemet-Ryan Air Attack Base (HRAAB) facilities and construction of a new, modern HRAAB facility that would allow the base to continue to provide high-quality fire protection and emergency response services. The Project would result in improved fueling operations; improved flight capability and improved response time by updating aircraft and aircraft pads and ancillary features; and replacing administrative and support uses. The Project would be developed on approximately 15.25 acres in the south-central portion of the airport, portions of which are currently operating as a helitack base. The Project includes construction of a two-story air operations building with a control room; landing pads and fire retardant loading pits; a 32-bed barracks and mess hall to replace the existing modular units; a combined helicopter/OV-10 hangar; two aircraft storage canopies; a helicopter training tower equipped with a hoist system for rappelling training; a fire retardant mixing station; a vehicle storage building for the protection and storage of firefighting equipment; and a generator yard/electrical building.

Pursuant to State CEQA Guidelines Section 15132, the Final EIR consists of the Draft Environmental Impact Report (EIR); comments and recommendations received on the Draft EIR; a list of persons, organizations, and public agencies that commented on the Draft EIR; responses to significant environmental points raised during the public review period; revisions to the Draft EIR; and the Mitigation Monitoring and Reporting Program. Accordingly, the Draft EIR and this Final EIR document collectively constitute the Final EIR for the Project.

The California Department of Forestry and Fire Protection (CAL FIRE) is the lead agency for the Project. The Final EIR was presented to the CAL FIRE decision-maker, and they have reviewed and considered the information contained in the Final EIR for the Project. In accordance with Section 15090 of the California Environmental Quality Act (CEQA), CAL FIRE hereby certifies that the Final EIR for the Hemet-Ryan Air Attack Base Replacement Project has been completed in compliance with CEQA and reflects CAL FIRE's independent judgement and analysis.

DocuSigned by:
John Melvin
6569EF653A04422...

9/30/2026

John Melvin, Assistant Deputy Director
Resource Protection and Improvement
California Department Forestry and Fire Protection

Date

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# LIST OF ABBREVIATIONS AND ACRONYMS

| | |
|---|---|
| AAB | Air Attack Base |
| AB | Assembly Bill |
| CAL FIRE | California Department of Forestry and Fire Protection |
| CEQA | California Environmental Quality Act |
| CHL | California Historical Landmark |
| CHRIS | California Historical Resources Information System |
| County | County of Riverside |
| CRHR | California Register of Historic Resources |
| DPR | Department of Parks and Recreation |
| HABS | Historic American Building Survey |
| HRAAB | Hemet-Ryan Air Attack Base |
| IS | Initial Study |
| MM | Mitigation Measure |
| MMRP | Mitigation Monitoring and Reporting Program |
| NAHC | Native American Heritage Commission |
| NHPA | National Historic Preservation Act |
| NOP | Notice of Preparation |
| NRHP | National Register of Historic Places |
| PRC | Public Resources Code |
| Project | Hemet-Ryan Air Attack Base Replacement Project |
| RCM | Regulatory Compliance Measure |
| RCSD | Riverside County Sheriff's Department |

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| | |
|---|---|
| SCH | State Clearinghouse |
| SHPO | State Historic Preservation Officer |
| SR- | State Route |

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# 1.0 INTRODUCTION

## 1.1 PURPOSE AND INTENDED USES OF THIS FINAL EIR

The California Department of Forestry and Fire Protection (CAL FIRE), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (EIR) for the Hemet-Ryan Air Attack Base Replacement (HRAAB) Project (Project). The purpose of this Final EIR is to complete the environmental review process for the Project in accordance with CEQA (Public Resources Code [PRC] Section 21000 et seq.) and the *State CEQA Guidelines* (California Code of Regulations, Title 14, Section 15000 et seq.). This Final EIR provides CAL FIRE, responsible and trustee agencies, other public agencies, and interested members of the public with information regarding the environmental effects of the Project and addresses comments received on the Draft EIR during the public review period.

Pursuant to *State CEQA Guidelines* Section 15132, the Final EIR consists of the Draft EIR; comments and recommendations received on the Draft EIR; a list of persons, organizations, and public agencies that commented on the Draft EIR; responses to significant environmental points raised during the public review period; revisions to the Draft EIR; and the Mitigation Monitoring and Reporting Program (MMRP). Accordingly, the Draft EIR and this Final EIR document collectively constitute the Final EIR for the Project.

Prior to taking action on the Project, CAL FIRE must certify that the Final EIR has been completed in compliance with CEQA; that the Final EIR was presented to the decision-making body and that the decision-making body reviewed and considered the information contained in the Final EIR prior to approving the Project; and that the Final EIR reflects CAL FIRE's independent judgment and analysis. The Final EIR will be used by CAL FIRE in considering whether to approve the Project and in making the findings required by CEQA.

The Final EIR may also be used by responsible and trustee agencies and other public agencies in connection with permits, approvals, or other discretionary actions necessary to implement the Project. These agencies may rely on the environmental analysis contained in the Final EIR when considering subsequent actions related to the Project, consistent with the requirements of CEQA (see **Table 1.A,** below). Section 15381 of the *State CEQA Guidelines* defines Responsible Agencies as public agencies other than the Lead Agency that will have discretionary approval power over the Project and/or or some component of the Project.

## 1.2 PROJECT LOCATION

The approximately 15.25-acre HRAAB Project site is located at Hemet-Ryan Airport in the city of Hemet, western Riverside County, and occupies a portion of Assessor's Parcel Number 456-020-002. The HRAAB Project site is in the south-central portion of the airport. The airport is owned and operated by the County of Riverside (County) and serves the cities of Hemet, San Jacinto, and other nearby communities in the east-central portion of western Riverside County. The HRAAB Project site is leased and managed by CAL FIRE.

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### Table 1.A: Regulatory Requirements, Permits and Approvals

| Agency | Permit(s) |
|---|---|
| State Water Resources Control Board (SWRCB) | Construction General Permit (including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and best management practices (BMPs). |
| County of Riverside Department of Environmental Health (DEH), Hazardous Materials Branch (a Certified Unified Program Agency [CUPA]) | The Hazardous Materials Branch is responsible for inspecting facilities that handle hazardous materials, generate hazardous waste, treat hazardous waste, own/operate underground storage tanks, own/operate aboveground petroleum storage tanks, or handle other materials subject to the California Accidental Release Program.<br><br>The transport, storage, and use of aircraft fuel, diesel and gasoline, oils and lubricants, and specialty fire suppression liquids would be subject to review, approval, and conditions identified by the DEH Hazardous Materials Branch. |
| Riverside County Airport Land Use Commission (ALUC) | Review and approval of project plans, including relocation and operation of relocated Riverside County Sheriff's Department (RCSD) helicopter pads. |
| California Department of Forestry and Fire Protection (CAL FIRE) Aviation | Permits or approvals associated with aviation activities on the site. |
| South Coast Air Quality Management District | Air permit (for the generator); Authority to Construct/Operate Permit. |
| State Fire Marshal; State Architect | Approval for Americans with Disabilities Act, structural review, and fire suppression and code compliance review. |
| Federal Aviation Administration (FAA) | Airspace study as required by Part 157 of the Federal Aviation Regulations. Results in an "Airspace Determination Letter." |
| County of Riverside | Airport Manager will review the design drawings, particularly for the helipads and tower. |
| City of Hemet, Department of Life Safety | Will review the local fire authority requirements per the Office of the State Fire Marshal. |

Source: Compiled by: LSA Associates, Inc. (December 2025).
Note: The leased boundaries of Hemet-Ryan Air Attack Base (HRAAB) are not changing. Because the HRAAB is located at an existing airport that is currently permitted for helicopter operations, California Department of Transportation (Caltrans) Division of Aeronautics permits are not required.

The airport is accessed from State Route (SR-)79 and SR-74, approximately 2.5 miles west and 1.0 mile north, respectively. The airport is surrounded by West Acacia Avenue to the north, South Sanderson Avenue to the east, Walden Weaver Road and West Stetson Avenue to the south, and Warren Road to the west.

## 1.3 PROJECT OBJECTIVES

CAL FIRE continues to be impacted by changes in fire characteristics (e.g., fires are increasing in size, and the fire season now extends almost all year long) and changes in technology developed to fight fires, save lives, and protect natural resources. Changes in State and federal regulations, including building codes, energy-saving building criteria, and public works funding, have an effect on facilities as well. These factors have prompted redesigns of buildings and supporting facility infrastructure approximately every 4 to 8 years. As just one example, each new model of fire apparatus has been a little larger than the last, requiring longer and wider storage buildings.

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As provided by CAL FIRE, the objectives of the Project are to:

- Redevelop an existing CAL FIRE facility with a modern facility that has sufficient capacity to provide high-quality fire protection and emergency response services within the service area of the existing HRAAB;
- Expand existing CAL FIRE leased area to provide additional space for larger facilities and temporary staging locations for an influx of personnel and equipment during large fire events;
- Provide facilities that improve fueling operations, flight capability, and response time by updating aircraft and aircraft pads and ancillary features; and replacing administrative, training and support facilities.
- Provide facilities that are properly sized and equipped to accommodate larger and year-round fire events;
- Provide facilities with sufficient capacity to house any seasonal influx of firefighting staff;
- Provide facilities with appropriate accommodations for all firefighting personnel; and
- Provide for an updated air attack base (AAB) that fully incorporates current standards relative to safety, energy efficiency, and sustainability.

## 1.4 SUMMARY OF PROJECT DESCRIPTION

### 1.4.1 Current Operations

The existing HRAAB was established in 1959 and is in the CAL FIRE Riverside Unit, providing coverage to Orange, Riverside, and San Bernardino counties and the Cleveland, San Bernardino, and Angeles national forests. The HRAAB is statistically one of the most active AABs in the nation. The base provides initial attack aircraft service to over 17,000 square miles (44,000 $km^2$) of private, State, and federally owned lands. The fleet consists of:

- One OV-10 Bronco - Air Attack 310
- Two S2-Ts – Tankers 72 and 73
- One Firehawk (Sikorsky S-70i) helicopter[1]

The Air Tactical Group Supervisor coordinates with airtanker and helicopter personnel to manage critical areas of the fire for crew deployment as well as retardant and water drops. The retardant used to slow or retard the spread of fire is a slurry mix consisting of a chemical salt compound, water, clay, or gum as a thickening agent. At 9 pounds per gallon, an S-2T can carry 10,000 pounds of this mixture. The HRAAB is staffed year-round. Staff will likely work longer shifts during the summer months and while supporting large-scale, extended wildfire incidents.

[1] Use of the UH-1H: Super Huey" helicopter is being phased out.

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Existing on-site development includes:

- A tarmac and retardant fueling facilities;
- A maintenance building;
- Buildings for operations, pilots, and retardant tanks;
- A tower structure;
- A storage hut; and
- A fuel shed and ancillary site improvements.

Other features at HRAAB include fire retardant tanks, the adjacent landing strip, and a sheltered garage area at the east end of the property. There is also a mess hall to the north of the office. Portions of the site contain dumped asphalt near the operations buildings, as well as a concrete swale that connected the culverts within a drainage adjacent to the southern runway. Currently, the HRAAB is staffed by approximately 48 full-time staff, including 1 battalion chief, 6 helitack fire captains, 2 air tactical group supervisor fire captains, 4 fire pilots, 4 fire apparatus engineers, 2 heavy fire equipment operators, 21 firefighters, 5 fixed-wing pilots, and 3 mechanics.[2]

### 1.4.2 Proposed Project

CAL FIRE is proposing to replace the existing HRAAB facilities and construct a new, modern HRAAB facility that would allow the base to continue to provide high-quality fire protection and emergency response services. The Project would result in improved fueling operations; improved flight capability and improved response time by updating aircraft and aircraft pads and ancillary features; and replacing administrative and support uses. The Project would be developed on approximately 15.25 acres in the south-central portion of the airport, portions of which are currently operating as a helitack base.

The Project includes the following components:

- A two-story air operations building with a control room;
- Landing pads and retardant loading pits;
- A 32-bed barracks/mess hall to replace the existing modular units;
- A combination helicopter/OV-10 hangar;
- Two aircraft storage canopies;
- A helicopter training tower with a hoist system for repelling training;
- A fire retardant mixing station;
- A vehicle storage building to protect and store firefighting equipment; and
- A generator yard/electrical building.

Site work would consist of the demolition of an existing RCSD helipad, barracks, pilot's building, office, Quonset hut, tanks, gas shed, canopies, maintenance and storage buildings; the replacement of existing structures with new facilities, and the installation of sewer connections, fencing, paving,

[2] Hemet-Ryan Air Attack Base operations are currently supported by five utility vehicles, one air operations support trailer, one fuel tender, five battery operated carts, one forklift, three diesel retardant plant pumps, and four portable generators.

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landscaping, associated utilities, appurtenances, and other related site work. Discussions are underway regarding the relocation of the existing control tower. The facility lease would be extended to 50 years.

The Project will be developed in one phase.[3] Construction activities would start when Project funding has been fully secured and all construction contracts have been put in place. Current estimates anticipate construction would commence by May 2028 and be completed by March 2030. Construction access to the Project site will be from the existing entry at Waldon Weaver Road and Stetson Avenue.

## 1.5 MAJOR CONCLUSIONS OF THE ENVIRONMENTAL ANALYSIS

An Initial Study (IS) (provided in Appendix A-3 of the Draft EIR) was prepared in November 2025 for the Project. The IS was used, in part, to scope out environmental issues that were determined to be "less than significant" or have "no impact." As required by *State CEQA Guidelines* Section 15128, the Draft EIR identified the potential effects of the proposed Project that were determined not to be significant and adverse, and therefore, not addressed in the Draft EIR. As determined in the IS, the proposed Project would not result in adverse impacts related to the following environmental factors: aesthetics, agriculture and forestry resources, air quality, biological resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, and wildfire. The only environmental topic determined to be potentially significant in the IS was cultural resources. Therefore, cultural resources is the only topic evaluated further in the Draft EIR.

Despite the implementation of Mitigation Measures (MM) **CUL-1** and **CUL-2**, impacts resulting from the relocation of the control tower (deemed individually eligible for listing on the National Register of Historic Places [NRHP], California Register of Historical Resources [CRHR] and California Historical Landmarks [CHL]) and demolition of other on-site structures evaluated as contributing resources to a historic district eligible for listing on the NRHP, CRHR, and CHL would be a significant and unavoidable impact.

## 1.6 CEQA PUBLIC REVIEW PROCESS

CAL FIRE, as the Lead Agency, originally prepared an IS and issued a Notice of Preparation (NOP) for the EIR on November 25, 20252, which was distributed via the State Clearinghouse (SCH). The SCH issued a project number for the EIR (SCH No. 2025111100). The primary purpose of preparing the IS was to scope the environmental analysis and evaluate potential environmental impacts that may result from Project approval. The IS was also used to scope out environmental issues that were determined to be "less than significant" or "no impact."

In accordance with *State CEQA Guidelines* Section 15082, the IS/NOP was circulated to responsible agencies and individuals for a period of 30 days, during which time written comments were solicited pertaining to environmental issues and topics that the EIR should evaluate. One comment was

[3] The existing tower must remain operational until the new air operations building is operational. This may require minor phasing of the Project.

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received during the NOP comment period from the Native American Heritage Commission (NAHC). The comment was a general response related to the consultation afforded Native American tribes under Assembly Bill (AB) 52.

The Draft EIR for the Project was circulated for public review from April 24, 2026, through June 8, 2026. During the public review period, the Draft EIR was made available to public agencies, interested organizations, and members of the public for review and comment. The Draft EIR was also submitted to the SCH for distribution to reviewing agencies and was posted on CAL FIRE's website, at: https://calfire.app.box.com/s/6uzjbg146cfn018h1jw98871hp740x7t/folder/238725157425.

CAL FIRE received one comment from the South Coast Air Quality Management District (South Coast AQMD). No other agency or public comments were received in response to the Draft EIR 45-day during the public review period. In accordance with *State CEQA Guidelines* Section 15088, this document includes written responses to the South Coast AQMD's comments (refer to Section 2.0, Comments and Responses, of this document).

## 1.7 SHPO CONSULTATION AND CONCURRENCE

As part of the environmental review process for the Project, CAL FIRE consulted with the State Historic Preservation Officer (SHPO) pursuant to PRC Sections 5024 and 5024.5 regarding the Project's potential effects on State-owned historical resources. On June 29, 2026, CAL FIRE submitted a PRC Section 5024.5 Consultation Initiation to the SHPO for review and requested concurrence with CAL FIRE's determination that the HRAAB is a historic district meeting NRHP eligibility at the State level of significance and eligibility as a CHL and that the Control Tower, a contributor to the historic district, is individually eligible for the NRHP and as a CHL. In a correspondence dated August 26, 2026, the SHPO concurred with CAL FIRE's determination that:

- HRAAB meets NRHP Criteria A and C at the State level of significance and as a CHL, and the Control Tower individually meets NRHP Criteria A and C and as a CHL.
- The proposed Project will result in an adverse effect on the master-list eligible HRAAB, which will be demolished entirely.
- The Control Tower will be added to the master list of State-owned historical resources, but the HRAAB will not be added to the master list.

The SHPO requested minor revisions to Mitigation Measure **MM CUL-1**, including that CAL FIRE submit the Historic American Building Survey (HABS) to the SHPO for a 30-day review and comment before it is transmitted further. The SHPO also recommended CALFIRE consult with the National Park Service (NPS), to determine whether NPS will accept the HABS documentation for a project that does not have a federal nexus. Since any mitigation adopted for an adverse effect, must have a public benefit, the SHPO recommends in addition to the distribution locations listed by CALFIRE in **MM CUL-1**, to provide a copy of the HABS documentation to the California Historic Resources Information System (CHRIS), to explore other venues such as the Riverside Historical Society or the Riverside County Historical Heritage Association. The SHPO recommends that the Department of Parks and

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Recreation (DPR) 523 form should only contain the most relevant sections and references from the overall historical context as applicable for the evaluation under the NRHP criteria.

The results of consultation with SHPO have been incorporated into the environmental review of the Project, as applicable (refer to Section 3.0, Revisions to the Draft EIR). Specifically, Mitigation Measure **MM CUL-1** has been revised to incorporate the above requests from the SHPO.

## 1.8 ORGANIZATION OF THE FINAL EIR

Pursuant to *State CEQA Guidelines Section 15132*, the Final EIR consists of the Draft EIR; comments and recommendations received on the Draft EIR; a list of persons, organizations, and public agencies commenting on the Draft EIR; responses to significant environmental points raised during the public review period; revisions to the Draft EIR; and any other information added by the Lead Agency. Accordingly, the Draft EIR and this Final EIR document, which includes the comments and responses and revisions to the Draft EIR, collectively constitute the Final EIR for the proposed project.

This Final EIR document is organized into the following sections:

- **Section 1.0, Introduction.** This section describes the purpose and intended uses of the Final EIR, summarizes the environmental review process and public review of the Draft EIR, and describes the organization and contents of the Final EIR.

- **Section 2.0, Comments and Responses.** This section identifies the agencies, organizations, and individuals that submitted comments on the Draft EIR during the public review period. This section reproduces the comment letters received, identifies and numbers individual comments, and provides CAL FIRE's responses to the environmental issues raised in those comments.

- **Section 3.0, Revisions to the Draft EIR.** This section identifies revisions, clarifications, and corrections made to the Draft EIR. This section also explains whether the revisions affect the conclusions presented in the Draft EIR.

- **Section 4.0, Mitigation Monitoring and Reporting Program.** This section presents the MMRP prepared pursuant to PRC Section 21081.6. The MMRP identifies the mitigation measures applicable to the Project and establishes the timing, responsible parties, and monitoring or reporting requirements necessary to ensure their implementation.

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# 2.0 COMMENTS AND RESPONSES

In accordance with the *State CEQA Guidelines* Section 15088, this Final EIR includes written responses to comments received by CAL FIRE on the Draft EIR. CAL FIRE received one comment letter during the public review period, dated June 3, 2026, from the South Coast AQMD. The South Coast AQMD letter is included as Appendix A-1 of this Final EIR. CAL FIRE provided a written response to the South Coast AQMD on September 15, 2026, which is included as Appendix A-2.

The comments raised by the South Coast AQMD and CAL FIRE's responses do not constitute significant new information requiring recirculation of the Draft EIR pursuant to *State CEQA Guidelines* Section 15088.5, nor do they warrant revisions to the EIR.

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# 3.0 REVISIONS TO THE DRAFT EIR

This section identifies revisions to the Draft EIR made as a result of consultation between CAL FIRE and the SHPO pursuant to PRC Sections 5024 and 5024.5. Specifically, the revisions modify Mitigation Measure **MM CUL-1**, presented on page 4-21 of the Draft EIR, to reflect the results of consultation with the SHPO and address SHPO's requested revisions to the measure. The revised mitigation measure is presented below, with additions shown in underline and deletions shown in strikeout.

**MM CUL-1** **Historic American Buildings Survey.** Prior to the commencement of demolition activities, the California Department of Forestry and Fire Protection (CAL FIRE) shall prepare Historic American Buildings Survey (HABS) documentation for the structures at the existing Hemet-Ryan Air Attack Base (HRAAB) that are to be demolished and/or relocated. The HABS documentation shall be completed to the standards outlined in *Secretary of the Interior's Guidelines for Architectural and Engineering Documentation.* Prior to finalization and distribution of the HABS documentation, CAL FIRE shall submit the documentation to the California State Historic Preservation Officer (SHPO) for a 30-day review and comment period and shall address SHPO comments, as appropriate. CAL FIRE shall also consult with the National Park Service (NPS) to determine whether the NPS will accept the HABS documentation for a project without a federal nexus. The HABS ~~document~~ documentation shall be appropriately archived, including copies delivered ~~(as warranted) to the National Park Service and California Historical Society, as well as local libraries, historical societies, and city offices~~ to the California Historical Resources Information System (CHRIS), the California Historical Society, and appropriate local repositories, such as local libraries, historical societies, and city offices. CAL FIRE shall also provide the documentation to the NPS if the NPS determines that it will accept the documentation. Appropriate local repositories shall include consideration of the Riverside Historical Society and Riverside County Historical Heritage Association.

The modification to Mitigation Measure **MM CUL-1** does not result in new significant environmental effects, substantially increase the severity of a previously identified significant effect, or otherwise constitute significant new information requiring recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5.

The modifications to Mitigation Measure **MM CUL-1** have been incorporated into the MMRP presented in Section 4.0 of this Final EIR. Accordingly, the MMRP in Section 4.0 of this Final EIR replaces the MMRP previously presented in Section 7.0 of the Draft EIR.

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# 4.0 MITIGATION MONITORING AND REPORTING PROGRAM

## 4.1 INTRODUCTION

CEQA and the *State CEQA Guidelines* (PRC Section 21081.6 and CEQA Guidelines Sections 15091[d] and 15097) require public agencies "to adopt a reporting and monitoring program for changes to the project which it has adopted or made a condition of project approval to mitigate or avoid significant effects on the environment." A mitigation monitoring and reporting program (MMRP) is required for the proposed project because the EIR identifies significant adverse impacts related to the project implementation, and mitigation measures have been identified to reduce those impacts. Adoption of the MMRP would occur along with approval of the Hemet-Ryan Air Attack Base Replacement Project.

## 4.2 PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner prior to implementation of the Project. The attached table has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies the impact, mitigation measures (as amended through the Final EIR), monitoring responsibility, mitigation timing, and provides space to confirm implementation of the mitigation measures. The numbering of mitigation measures follows the numbering sequence found in the EIR.

## 4.3 ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, CAL FIRE is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed.

Inquiries should be directed to:

Contact: Christina Snow, Senior Environmental Planner
1131 S Street
Sacramento, CA 95811
Phone: (916) 324-1639

CAL FIRE is responsible for overall administration of the MMRP and for verifying that CAL FIRE staff members and/or contractors of CAL FIRE have completed the necessary actions for each measure (i.e., appropriate amendments to the proposed ordinance).

## 4.4 REPORTING

CAL FIRE shall document and describe compliance with the required mitigation measures either within the attached table or a separate monitoring document.

## 4.5 MITIGATION MONITORING AND REPORTING PROGRAM TABLE

**Table 4.A** lists each of the mitigation measures (MM) and regulatory compliance measures (RCM) specified in the Draft EIR, identifies the party or parties responsible for implementation and

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monitoring of each measure, the time frame in which the mitigation will be implemented, and date when the mitigation was completed.

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## Table 4.A: Mitigation Monitoring and Reporting Program

| EIR Mitigation Measures (MM) and Regularly Compliance Measures (RCM) | | Timing | Responsible Party / Approving Agency | Date Completed and Initials |
|---|---|---|---|---|
| **Aesthetics** | | | | |
| There are no significant impacts related to aesthetics. No mitigation was identified in either the Initial Study of EIR. | | | | |
| **Agriculture and Forestry Resources** | | | | |
| There are no significant impacts related to agriculture and forestry resources. No mitigation was identified in either the Initial Study or EIR. | | | | |
| **Air Quality** | | | | |
| There are no significant impacts related to air quality. No mitigation was identified in either the Initial Study or EIR. | | | | |
| **Biological Resources** | | | | |
| **MM BIO-1** | **Focused Survey for Burrowing Owl.** Prior to the start of ground disturbing activity, demolition, or construction activity, focused surveys for burrowing owl shall be conducted by a qualified biologist in accordance with the current CDFW survey protocol for this species (2012). The current protocol requires four visits conducted between February 15 and July 15.<br><br>If no burrowing owls are observed, no further mitigation would be required; however, a pre-construction survey (MM BIO-1B) would be required regardless of the results of the focused survey.<br><br>If burrowing owl is observed on or adjacent to the Project site, CAL FIRE (or a qualified biologist retained by CAL FIRE) shall consult with the CDFW to obtain an incidental take permit and to determine the appropriate compensatory mitigation for the loss of grassland habitat. Project impacts shall be compensated at no less than a 1:1 ratio (i.e., one acre of mitigation for each acre of habitat impacted). The mitigation strategy may include: preservation, enhancement, or restoration of on-site habitat; preservation, enhancement, or restoration of off-site habitat; purchase of credits at an approved mitigation bank; or a combination of these approaches, as approved by CDFW. If preservation, enhancement, or restoration would be used, a Habitat Mitigation and Monitoring Plan shall be prepared and shall include the following: responsibilities of the parties implementing the plan; performance criteria; mitigation site selection; seed mix and planting palette; site preparation and installation methodology; maintenance and monitoring schedule; contingency plan; and long-term site protection.<br><br>If no burrowing owls are observed, an incidental take permit is not required, and no compensatory mitigation is warranted. | Prior to issuance of any grading, construction, or building permits | CAL FIRE/Department of General Services | |
| **MM BIO-2** | **Pre-Construction Burrowing Owl Survey.** Prior to the start of construction, two burrowing owl take avoidance surveys shall be conducted by a qualified biologist; the first survey will be conducted at least 14 days prior to any site disturbance (grubbing, grading, and construction) and the second will be conducted within 24 hours of disturbance in accordance with CDFW (2012) guidelines.<br><br>If no burrowing owls are observed during the take avoidance survey, no further mitigation would be required.<br><br>If a burrowing owl or occupied burrow (as indicated by recent burrowing owl sign) is observed, a protective buffer shall be established around the burrow in accordance with CDFW (2012) guidance. The biologist shall stake and flag the protective buffer, and no construction activities shall be allowed within the protective buffer during the breeding season (February 1 through August 31), or until a qualified biologist determines that the burrow is no longer active.<br><br>If the burrow is within the project disturbance area, CAL FIRE or their representative shall consult with CDFW to coordinate relocation of the owl outside of the breeding season (September 1 through January 31) in accordance with accepted protocols. The appropriate method of relocation, such as eviction/passive relocation or active relocation, shall be based on the specific site conditions (e.g., distance to nearest suitable habitat and presence of burrows within that habitat) in coordination with the CDFW. Active relocation and eviction/passive relocation require the preservation and maintenance of suitable burrowing owl habitat determined through coordination with the CDFW. | Prior to issuance of any grading permits | CAL FIRE/Department of General Services | |
| **RCM BIO-1** | **Nesting Bird Clearance Survey.** If construction or ground-disturbing activities (including demolition) begin during the breeding season (i.e., February 1 to August 31), a qualified biologist shall conduct a pre-construction survey on the Project site for nesting birds and raptors within 3 days prior to the initiation of construction, demolition, or earthmoving activities. The qualified biologist shall document the results of the survey in a brief memorandum describing the methods and results of the survey, and describing any protective measures or required follow-up monitoring.<br><br>If an active nest is observed during the pre-construction clearance survey, a protective buffer shall be established around the nest based on the sensitivity of the species, the existing level of human activity, and the nature of the proposed construction activities. In general, the protective buffer shall be a minimum of 50 feet for passerines and 250 feet for raptors. The biologist shall stake and flag the protective buffer, and no construction activities shall be allowed within the protective buffer during the breeding season (February 1 through August 31), or until a qualified biologist determines that the nest is no longer active. Construction personnel shall be instructed on the sensitivity of protective buffers. The qualified biologist shall periodically monitor the nests to determine bird activity. The biological monitor may identify construction activities that could adversely affect nesting behavior, which would include but | Prior to construction or ground-disturbing activities | CAL FIRE/Department of General Services | |

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## Table 4.A: Mitigation Monitoring and Reporting Program

| | EIR Mitigation Measures (MM) and Regularly Compliance Measures (RCM) | Timing | Responsible Party / Approving Agency | Date Completed and Initials |
|---|---|---|---|---|
| | would not be limited to: disrupting reproductive behavior, nest abandonment, and/or prolonged absences of parents while incubating eggs. The biological monitor shall prepare field memorandums within 24 hours of each monitoring visit and shall submit them to CAL FIRE to document compliance with the applicable resource protection measures. Once the young have fledged and left the nest, or the nest otherwise becomes inactive under natural conditions, the protective buffer can be removed and construction activities can proceed within this area. | | | |
| **Cultural Resources** | | | | |
| **MM CUL-1** | **Historic American Buildings Survey.** Prior to the commencement of demolition activities, the California Department of Forestry and Fire Protection (CAL FIRE) shall prepare Historic American Buildings Survey (HABS) documentation for the structures at the existing Hemet-Ryan Air Attack Base (HRAAB) that are to be demolished and/or relocated. The HABS documentation shall be completed to the standards outlined in *Secretary of the Interior's Guidelines for Architectural and Engineering Documentation*. Prior to finalization and distribution of the HABS documentation, CAL FIRE shall submit the documentation to the California State Historic Preservation Officer (SHPO) for a 30-day review and comment period and shall address SHPO comments, as appropriate. CAL FIRE shall also consult with the National Park Service (NPS) to determine whether the NPS will accept the HABS documentation for a project without a federal nexus. The HABS documentation shall be appropriately archived, including copies delivered to the California Historical Resources Information System (CHRIS), the California Historical Society, and appropriate local repositories, such as local libraries, historical societies, and city offices. CAL FIRE shall also provide the documentation to the NPS if the NPS determines that it will accept the documentation. Appropriate local repositories shall include consideration of the Riverside Historical Society and Riverside County Historical Heritage Association. | Prior to the issuance of any demolition permit for any on-site structure or feature | Department of General Services | |
| **MM CUL-2** | **Interpretive Signage.** Prior to occupancy of the Project, CAL FIRE shall provide evidence that permanent interpretive signage has been placed in a prominent, publicly accessible location at Hemet-Ryan Airport. This signage shall describe the history of HRAAB and its historic role in wildland fire protection. | Prior to occupancy or operation of the new facilities | `Department of General Services | |
| **MM CUL-3** | **Inadvertent Discovery of Archaeological Resources.** If potential cultural/archaeological resources (i.e., sites, features, or artifacts) are discovered during construction activities for the Project, CAL FIRE shall be notified. Construction work occurring within 100 feet of the find shall stop immediately until CAL FIRE retains a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology. The qualified archaeologist shall evaluate the significance of the find.<br><br>Should the find be determined not to be a cultural resource, work may resume immediately, and no further notifications are required. Should the find be determined to be a cultural resource from any time period or cultural affiliation, CAL FIRE shall be notified. Work within 100 feet of the find shall not resume until the find has been evaluated and (1) it has been determined to be not a historic resource under the California Environmental Quality Act (CEQA); or (2) appropriate treatment measures for the find have been completed. | During ground-disturbing construction activities | Department of General Services | |
| **Energy** | | | | |
| There are no significant impacts related to energy. No mitigation was identified in either the Initial Study or EIR. | | | | |
| **Geology and Soils** | | | | |
| **MM GEO-1** | **Inadvertent Discovery of Paleontological Resources.** Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this measure, a "qualified paleontologist" shall be an individual with the following qualifications: (1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; (2) at least two years of professional experience related to paleontology; (3) proficiency in recognizing fossils in the field and determining their significance; (4) expertise in local geology, stratigraphy, and biostratigraphy; and (5) experience collecting vertebrate fossils in the field.<br><br>If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to CAL FIRE.<br><br>In the event paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology and/or Western Science Center, along with significant paleontological materials. Public educational outreach may also be appropriate. | During construction activities | Department of General Services | |
| **Greenhouse Gas** | | | | |
| There are no significant impacts related to greenhouse gases. No mitigation was identified in either the Initial Study or EIR. | | | | |

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## Table 4.A: Mitigation Monitoring and Reporting Program

| EIR Mitigation Measures (MM) and Regularly Compliance Measures (RCM) | | Timing | Responsible Party / Approving Agency | Date Completed and Initials |
|---|---|---|---|---|
| **Hazards and Hazardous Materials** | | | | |
| **MM HAZ-1** | **Hazardous Building Materials Survey.** Prior to the demolition of existing Infrastructure on the Project site, a comprehensive Hazardous Building Materials Survey (HBMS) for the Project site shall be prepared and signed by a qualified environmental professional, documenting the presence or lack thereof of hazardous building materials. The HBMS shall include abatement specifications for the stabilization and/or removal of identified hazardous building materials in accordance with all applicable laws and regulations. The demolition contractor(s) shall implement the abatement specifications and submit to CAL FIRE evidence of completion of abatement activities prior to demolition of the existing structures. | Prior to issuance of demolition permit(s) for any structure | Department of General Services | |
| **Hydrology and Water Quality** | | | | |
| **RCM HYD-1** | **Construction General Permit.** The Project applicant shall obtain coverage under the State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2022-0057-DWQ, NPDES No. CAS000002) (Construction General Permit). This shall include submission of Permit Registration Documents, including a Notice of Intent for coverage under the permit to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS).<br><br>A Stormwater Pollution Prevention Plan (SWPPP) shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit. These include: best management practices (BMPs) for erosion and sediment control, site management/housekeeping/waste management, management of non-stormwater discharges, run-on and runoff controls, and BMP inspection/ maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association's Stormwater Best Management Handbook: Construction.<br><br>The SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities.<br>Upon completion of construction and stabilization of the site, a Notice of Termination shall be submitted via SMARTS. | Prior to the issuance of any grading permits and commencement of construction activities | Department of General Services | |
| **RCM HYD-2** | **Final Water Quality Management Plan.** Prior to construction, the Project applicant shall prepare a final Water Quality Management Plan (WQMP), as required by RWQCB Order No. R8-2010-0033, as amended by Order No. R8-2013-0024, NPDES No. CAS618033 (MS4 permit). The final WQMP shall identify necessary site design best management practices (BMPs), source control BMPs, Low Impact Development (LID) BMPs, and treatment control BMPS (if applicable). | Prior to the issuance of any grading permits and commencement of construction activities | Department of General Services | |
| **Land Use and Planning** | | | | |
| There are no significant impacts related to land use of planning. No mitigation was identified in either the Initial Study or EIR. | | | | |
| **Mineral Resources** | | | | |
| There are no significant impacts related to mineral resources. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Noise and Vibration** | | | | |
| There are no significant impacts related to noise and vibration. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Population and Housing** | | | | |
| There are no significant impacts related to population and housing. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Public Services** | | | | |
| There are no significant impacts related to public services. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Recreation** | | | | |
| There are no significant impacts related to recreation. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Transportation** | | | | |
| There are no significant impacts related to transportation. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Tribal Cultural Resources** | | | | |
| There are no significant impact related to tribal cultural resources. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Utilities and Service Systems** | | | | |
| There are no significant impact related to utilities and service systems. No mitigation was identified in the Initial Study or EIR. | | | | |
| **Wildfire** | | | | |
| There are no significant impact related to wildlife. No mitigation was identified in the Initial Study or EIR. | | | | |

Source: Compiled by LSA (2026).

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# APPENDIX A-1

# SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT COMMENT LETTER

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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

June 3, 2026

Stephanie Coleman, Senior Environmental Planner
The California Department of Forestry and Fire Protection (CAL FIRE)
107 3rd Street, 4th 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.[1] 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.[2] Construction of the Proposed Project is anticipated to occur in May 2028, be completed by March 2030, and be conducted in one phase.[3] The Proposed Project is located at 4710 Walden Weaver Road in Hemet.[4]

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

[1] Focused Environmental Impact Report. Page 9.
[2] *Ibid.* Page 139.
[3] *Ibid.* Page 142.
[4] *Ibid.* Page 110.

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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.[5] 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,[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 Coating,[12] Regulation XIII – New Source Review,[13] Rule 1401 – New Source Review of Toxic Air Contaminants,[14] Rule 1470 – Requirements for Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines,[15] 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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[5] *Ibid.* Page 144.
[6] South Coast AQMD. Rule 201 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf
[7] South Coast AQMD. Rule 203 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf
[8] South Coast AQMD. Rule 401 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-401.pdf
[9] South Coast AQMD. Rule 402 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-402.pdf
[10] South Coast AQMD. Rule 403 available at: https://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403
[11] South Coast AQMD. Rule 1110.2 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1110_2.pdf
[12] South Coast AQMD. Rule 1113 available at https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf
[13] South Coast AQMD. Regulation XIII available at: https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/regulation-xiii
[14] South Coast AQMD. Rule 1401 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1401.pdf
[15] South Coast AQMD. Rule 1470 available at: https://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1470.pdf

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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[16] 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

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

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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 should you have any questions.

Sincerely,

*Sam Wang*

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW:SG
RVC260421-03
Control Number

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# APPENDIX A-2

# CAL FIRE RESPONSE

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**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**
**OFFICE OF THE STATE FIRE MARSHAL**
P.O. Box 944246
SACRAMENTO, CA 94244-2460
(916) 568-3800
Website: www.fire.ca.gov

September 15, 2026

Sam Wang, Program Supervisor, CEQA IGR
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

Dear Mr. Wang:

CAL FIRE, Department of General Services, and LSA have reviewed the comment letter (June 3, 2026) submitted by the South Coast Air Quality Management District (SCAQMD) on the Draft Focused Environmental Impact Report (EIR) for the proposed Hemet-Ryan Air Attack Base Replacement Project prepared by LSA dated April 2026 and the associated Initial Study (IS) dated November 2025.

The following sections summarize the comments received and provide LSA's responses to each comment.

**Comment 1 – Introduction**
The commenter expresses appreciation for the opportunity to review the document, notes that the California Department of Forestry and Fire Protection (CAL FIRE) is the California Environmental Quality Act (CEQA) Lead Agency and explains that their comments include a brief project summary followed by organized feedback on key topic areas of concern.

***Response to Comment 1***
This comment is introductory and transmits the SCAQMD formal comments on the Draft Focused EIR.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft Focused EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

**Comment 2 – Summary of Proposed Project Information in the Draft Focused EIR**
The commenter summarizes that the Proposed Project involves redevelopment of the Hemet-Ryan Air Attack Base on approximately 15.25 acres, including construction of new operational, residential, and support facilities, demolition of existing structures, and installation of utilities and site improvements. They note that the nearest sensitive receptor is located about 400 feet from the site and that construction is anticipated to occur between May 2028 and March 2030 in a single phase.

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***Response to Comment 2***
This comment provides a summary of the Proposed Project.

This comment does not contain any substantive comments or questions about the environmental analysis or conclusions contained in the Draft Focused EIR. Specific concerns are described and addressed in further detail in the responses below. No further response is required.

**Comment 3 – South Coast Air Quality Management District Air Permits and Role as a Responsible Agency**

The commenter notes that implementation of the Proposed Project may require SCAQMD permits for stationery and portable equipment, including the two proposed 408-horsepower (hp) diesel emergency generators, and recommends that the Final CEQA document include a discussion of applicable permitting requirements and rules. The commenter also suggests that the SCAQMD may act as a Responsible Agency under CEQA and that additional detail may be needed to support permit issuance.

***Response to Comment 3***
Operation of the proposed emergency generators and other combustion-related equipment may be subject to SCAQMD permitting requirements, including, but not limited to, Rules 201 (Permit to Construct), 203 (Permit to Operate), 401 (Visible Emissions), 402 (Nuisance), 403 (Fugitive Dust), 1110.2 (Emissions from Gaseous- and Liquid-Fueled Engines), Regulation XIII (New Source Review), Rule 1401 (New Source Review of Toxic Air Contaminants), and Rule 1470 (Diesel-Fueled Internal Combustion Engines). This requirement is noted in Section 2.6 of the Initial Study (Appendix A of the Draft Focused EIR). Furthermore, compliance with these rules would be required regardless of CEQA review and would be ensured through the SCAQMD's permitting process, which establishes enforceable emission limits, operational restrictions, and control requirements to minimize emissions.

As described in the air quality analysis, the Proposed Project includes two 408 hp diesel emergency generators, each assumed to operate up to 50 hours per year for testing and maintenance, consistent with typical regulatory limits for emergency standby equipment. This level of operation represents a conservative and industry-standard assumption for emissions analysis. The resulting emissions from generator operation were evaluated and determined to be below applicable SCAQMD significance thresholds (see Table 4.3.D of the Initial Study, Draft Focused EIR Appendix A).

While the Draft Focused EIR did not include an expanded discussion of specific SCAQMD permitting rules or explicitly identify the agency as a Responsible Agency, this does not affect the conclusions of the environmental analysis. The CEQA analysis evaluates worst-case emissions scenarios using conservative assumptions intended to avoid understating project emissions. As detailed on pages 4-13 through 4-15 of the Initial Study, included in Appendix A of the Draft Focused EIR, the analysis evaluates peak construction activities and equipment usage, includes all anticipated project-related emission sources, and assumes the maximum annual operation of the emergency generators for testing and maintenance. Where project-specific information was not available, the analysis relied on CalEEMod default assumptions, which are intended to provide reasonable planning-level estimates and may not account for project-specific efficiencies or emission-reduction measures that could further reduce emissions during construction and operation.

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As described, the analysis assumes the emergency generators would operate up to 50 hours per year for testing and maintenance, representing the maximum annual operating allowance typically permitted for such equipment. Because actual testing and maintenance operation is often less than this assumed level, the analysis provides a conservative estimate of generator emissions. Based on these assumptions, the analysis demonstrates that both construction and operational emissions, including those from emergency generators and other combustion sources, would remain below the applicable significance thresholds. In addition, any required SCAQMD permits would further limit emissions through enforceable conditions, ensuring that project-related emissions would not exceed levels evaluated in this analysis.

Accordingly, although additional clarification regarding permitting requirements and regulatory compliance can be provided, such information is administrative and does not represent new impacts or a substantial increase in the severity of previously identified impacts pursuant to CEQA Guidelines Section 15088.5. The identification of SCAQMD as a Responsible Agency and compliance with applicable permitting requirements would occur as part of project implementation and would not alter the environmental conclusions.

**Comment 4 – Health Risk Assessment during Project Operation**
The commenter recommends that the CEQA document be revised to include a comprehensive operational Health Risk Assessment (HRA) evaluating toxic air contaminant (TAC) emissions from stationary, portable, and mobile sources, including the proposed emergency generators, and notes the presence of nearby sensitive receptors within approximately 400 feet of the project site.

***Response to Comment 4***
As discussed on pages 4-16 and 4-17 of the Initial Study (Appendix A of the Draft Focused EIR), localized air quality impacts—including emissions of diesel particulate matter (DPM), the primary TAC of concern—were evaluated using a Localized Significance Threshold (LST) analysis consistent with SCAQMD guidance. The LST analysis is used to assess localized exposure to pollutants, including DPM, and determine whether emissions from project-related sources could result in adverse health effects at nearby sensitive receptors. According to the SCAQMD, LSTs “present the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or California ambient air quality standard (NAAQS or CAAQS, respectively) and are developed based on the ambient concentrations of that pollutant for each source receptor area and distance to the nearest sensitive receptor.” NAAQS and CAAQS are established to protect public health with an adequate margin of safety, including sensitive populations such as children, the elderly, and individuals with pre-existing health conditions.

The results of the LST analysis demonstrate that localized impacts would be less than significant at the nearest sensitive receptors, which are approximately 400 feet from the project site. This distance provides reasonable dispersion of emissions from project-related sources, including diesel-powered equipment, such that pollutant concentrations would not reach levels associated with significant health risks. Typical sources of TAC emissions during project operations include large stationary sources, such as power plants, refineries, manufacturing facilities, and other industrial uses, as well as high-intensity mobile or fuel-dispensing uses. The Proposed Project does not include these types of sources. Rather, the project consists primarily of support and operational facilities.

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In addition, operational emissions from the two proposed 408 hp emergency generators were conservatively estimated assuming up to 50 hours of operation per year for testing and maintenance, consistent with regulatory limits for emergency standby equipment. This limited and infrequent operation substantially reduces the potential for health risk exposure.

While a stand-alone, source-specific operational HRA was not prepared, the combination of (1) conservative emissions assumptions, (2) limited operational hours for diesel equipment, (3) dispersion over distance to sensitive receptors, and (4) LST analysis results demonstrating less than significant localized impacts provides sufficient evidence to conclude that the Proposed Project would not result in substantial adverse health effects. Furthermore, any stationary sources subject to SCAQMD permitting would be required to comply with applicable regulatory requirements, including New Source Review and TAC rules, which are designed to ensure that health risks remain below applicable significance thresholds.

Accordingly, the existing analysis adequately characterizes potential health risks and demonstrates that impacts would be less than significant. The preparation of a refined operational HRA would not be expected to identify new or more severe impacts than those already disclosed, nor would it change the significance determination. Therefore, the air quality analysis is sufficient to support the conclusion that operational TAC impacts, including potential health risks to nearby sensitive receptors, would be less than significant, and no revisions to the impact conclusion are required.

**Comment 5 – Conclusion**
The commenter requests that the Lead Agency provide written responses to all comments at least 10 days prior to certifying the Draft Focused EIR, consistent with CEQA requirements. They also state that if the Lead Agency disagrees with any recommendations, it must provide detailed, evidence-based explanations. The commenter offers to coordinate with the Lead Agency to address air quality issues and provides contact information for follow-up.

***Response to Comment 5***
This comment concludes the letter with a request that CAL FIRE adequately address the comments provided in this letter and provide those responses to SCAQMD 10 days prior to certifying the Draft Focused EIR. CAL FIRE will comply with *State CEQA Guidelines* Section 15088(a-b) and provide responses to SCAQMD comments on the Draft EIR 10 days prior to certifying the Draft Focused EIR.

Sincerely,

Signed by:
Christina Snow
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Christina Snow
Senior Environmental Planner
Technical Services
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