

## 5 List of Personnel or Agencies Contacted or Consulted

### 1 United States Government

#### 2 Department of the Navy

3 Rachelle Hill, NAVFAC SW Environmental Planner

4 Karen Mabb, NAVFAC SW Natural Resource Specialist

#### 5 United States Marine Corps

6 Myrna Alzaga, MCAS Miramar Environmental Management Department

7 Chuck Black, MCAS Miramar Environmental Management Department

8 Dave Boyer, MCAS Miramar Environmental Management Department

9 Colleen Eckenroad, MCB Camp Pendleton, Environmental Security

10 Lieutenant Colonel Thomas Fries, MCAS Miramar Command

11 Tony Guinn, MCAS Miramar Operations

12 Rick Gomez, MCAS Miramar S-3 Training

13 John Hawthorne, MCAS Miramar Operations

14 JoEllen Kassebaum, MCAS Miramar Environmental Management

15 Lieutenant Colonel Thomas Kerley, MCAS Miramar Environmental Management

16 Delmer Lake, MCAS Miramar I&L/Public Works Department

17 Ronald E. Lamb, CEP, HQMC/MCICOM GF-7

18 Ros Lezerda, MCAS Miramar I&L/Public Works Department

19 Juan Lias, MCAS Miramar CP&L

20 Zak Likins, MCI West

21 Bill Moog, MCAS Miramar Environmental Management

22 Ryan Orndorff, MCI Headquarters

23 Antoinette Perez, MCAS Miramar I&L/Real Estate

24 Bertha Riens, MCAS Miramar I&L/Real Estate

25 Captain Jody Stelly, MCAS Miramar I&L/Public Works Department

26 Keith Spencer, MCAS Miramar S-7

27 John Stimson, MCAS Miramar Legal Counsel

28 Lieutenant Colonel Eric Wolf, MCAS Miramar I&L

#### 29 United States Army Corps of Engineers

30 Peggy Bartels, USACE Regulatory

31 Therese Bradford, USACE Regulatory

32 Meris Bantilan-Smith, USACE Regulatory

1 **United States Environmental Protection Agency**

2 Elizabeth Goldmann, EPA Region 9

3 **United States Fish and Wildlife Service**

4 Katy Kughen, Biologist

5 Jonathan Snyder, Supervisory Biologist

## 6 List of Preparers

### 1 Lead Agency

2 USMC  
 3 MCAS Miramar  
 4 San Diego, California  
 5 Myrna Alzaga, Project Leader

6 This EA was prepared for MCAS Miramar under the direction of the DoN by Leidos (formerly a part of  
 7 SAIC). Members of Leidos' professional staff who contributed to the preparation of this document are  
 8 listed below.

Name	Title	Degree	Years of Experience	Project Participation
Trevor Pattison	Program Manager/ Senior Environmental Scientist	B.S., Geological Sciences- Earth Systems	16	Project Manager, Endangered Species Act, Biological Resources, QA/QC
Catrina Gomez	Project Manager/ Environmental Planner	MSEM, Environmental Science and Management	10	Deputy Project Manager; Executive Summary; Land Use; Other NEPA Considerations
Chris Crabtree	Air Quality Specialist	B.A., Environmental Studies	21	Air Quality
Joel Degner, PE, CPSWQ, QSD/QSP	Hydrologist/Biologist	B.S., Hydrologic Sciences	10	Biological Resources, Water Resources, Restoration Ecology
Catherine FitzGerald	Graphic Artist	A.A., Fine Arts	30+	Graphic Design
Karen Foster, RPA	Cultural Resources Manager/NEPA P	Ph.D., Anthropology	20	Cultural Resources, QA/QC
Joe Jimenez, RPA	Cultural Resources Manager	M.A., Anthropology	30+	Cultural Resources
Perry Russell, PG, CEG	Geologist/ Hydrogeologist	M.S., Geological Sciences	24	Geological Resources; Public Health and Safety; Water Resources
Tara Schoenwetter	Senior Ecologist/Biologist	Ph.D., Ecology & Conservation Biology	13	Biological Resources
Elizabeth Riley	Word Processing Specialist	B.A., Psychology	3	Word Processing
Nicole Schoo	Environmental Scientist	B.S., Biology	3	Copy Editing
Alison Smith	Editor	B.A., English	7	Technical Editing
Chris Woods	GIS Programmer	B.A., Geography	15	GIS
Andrew Nelson	Senior Planner	MPP, Environmental Policy	30+	QA/QC

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# **Appendix A**

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**Agency Correspondence**

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## UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION MIRAMAR  
P.O. BOX 452001  
SAN DIEGO CA 92145-2001

IN REPLY REFER TO:  
5090 3819  
17 JAN 2013

Mr. Jim Bartel  
Carlsbad Field Office  
U.S. Fish and Wildlife Service  
6010 Hidden Valley Road  
Carlsbad, CA 92011

Ms. Therese Bradford  
U.S. Army Corps of Engineers  
6010 Hidden Valley Road, Suite 105  
Carlsbad, CA 92011

Dear Ladies and Gentlemen:

SUBJECT: COOPERATING AGENCY INVITATION - VERNAL POOL BANKING  
INITIATIVE

Pursuant to the National Environmental Policy Act (NEPA), Marine Corps Air Station (MCAS) Miramar is preparing an Environmental Assessment (EA) to study an initiative to develop a conservation/mitigation bank for vernal pool resources for self use on the installation. As regulatory authorities for the implementation of the Endangered Species Act (ESA) and Clean Water Act (CWA), you have significant roles in the approval process for this proposed action. Because of this, we invite you to actively participate with MCAS Miramar as a federal cooperating agency in the preparation of analyses and documentation required by NEPA. It is our goal to prepare an EA that is fully sufficient, in both scope and content, for decision making relative to site selection and developing vernal pool wetland habitat by all of our agencies.

As an operational military air field for more than seven decades, MCAS Miramar has an extensive underground utility network supporting facilities constructed as long ago as the 1940's. We have many mission essential areas with utilities and facilities that are occupied by vernal pool associated species. Repair, redevelopment, and even new development, are activities that are now complicated by the regional loss of vernal pool resources. Future projects and activities will require compensatory mitigation where protection and conservation in place is not possible or feasible.

Our resource survey work over the last decade has identified more than 7,000 locations ponding water sufficiently to warrant

survey for vernal pool species. As of August 2011, when our last Integrated Natural Resources Management Plan was completed, more than 4,000 of these supported one or more vernal pool associated endangered species. It is not possible to completely avoid these resources when planning for repair, maintenance, and future development/redevelopment. In some locations, long term conservation of a moderate-to-high quality state is not feasible. Therefore, we are undertaking this initiative to plan for developing compensatory vernal pool wetland habitat at site(s) more appropriate for long-term conservation protections. Development of a conservation/mitigation bank is the means we hope to use to achieve this goal.

As the lead agency, MCAS Miramar will prepare the EA, including but not limited to the following tasks:

- Gathering necessary land use, resource, and parcel information for potential sites;
- Identifying the scope of the EA, including alternatives;
- Working with agencies and the public to identify issues and impacts associated with alternatives;
- Providing an opportunity for review and comment on a draft EA via our environmental web site and public notice;
- Conducting relevant and related regulatory consultations, such as Section 106 National Historic Preservation Act and Section 7 Endangered Species Act; and
- Maintaining an administrative record.

As cooperating agencies, we request your support and participation by:

- Identifying appropriate staff points of contact;
- Providing relevant technical expertise and policy guidance early and throughout the process;
- Participating, as necessary, in scoping/planning meetings;
- Ensuring that your agencies' requirements are met, while preventing unnecessary duplication of effort; and
- Providing timely review and comments throughout the process.

Should you not accept our invitation to formally participate as a federal cooperating agency, we would still value and seek your participation in our planning process. Your assistance with framing alternatives, impact analysis, application of your agency's policies and regulations will be important to our planning success.

We look forward to working with you to complete a planning process that meets the needs of all of our organizations. Our point of contact is Mr. David Boyer, Natural Resources Division Director, at (858)577-1125 and Ms. Myrna Alzaga, Environmental Planning Program, at (858)577-6115. Our supporting Environmental Planner from the Navy is Ms. Rachelle Hill, at (619)532-4468.

Sincerely,



T. E. KERLEY  
Lieutenant Colonel, U.S. Marine Corps  
Environmental Management Officer  
By direction of the Commanding Officer

Copy to: EPA (Ms. E. Goldmann)  
HQ, USMC (MCICOM/GF-7)  
MCI-West (Env. Sec.)



## UNITED STATES MARINE CORPS

MARINE CORPS AIR STATION MIRAMAR  
P.O. BOX 452001  
SAN DIEGO CA 92145-2001

IN REPLY REFER TO:  
5090 4 2 1 8  
25 JUN 2014

Ms. Therese Bradford  
South Coast Branch/Carlsbad Field Office  
U.S. Army Corps of Engineers  
5900 La Place Court, Suite 100  
Carlsbad, CA 92008

Mr. Scott Sobiech  
Carlsbad Field Office  
U.S. Fish and Wildlife Service  
2177 Salk Avenue, Suite 250  
Carlsbad, CA 92008

Ms. Elizabeth Goldmann  
Environmental Scientist  
U.S. Environmental Protection Agency  
75 Hawthorne St. (WTR-8)  
San Francisco, CA 94105

Dear Ladies and Gentlemen:

SUBJECT: ADVANCE MITIGATION PLANNING COORDINATION

Marine Corps Air Station (MCAS) Miramar (Station) is continuing its planning for development of advanced vernal pool mitigation support of future operations, maintenance, and construction requirements. Your support and encouragement has been helpful. At this time we seek your review and comment on the enclosed draft environmental assessment (dEA) prepared to support our decision process. We plan the next draft of the EA as a pre-final version to be posted for public review.

Because your approval of the final mitigation agreement is required, we also want to invite you to visit the areas under consideration before we proceed further with our planning. Further, we need to discuss and determine with you the mitigation crediting approach and agreement to pursue. The "Advance Permittee-Responsible Mitigation" approach described in a U.S. Army Corps of Engineers Seattle District/Washington State Interagency Regulatory Guide seems to be a very good fit for our needs (see <https://fortress.wa.gov/ecy/publications/publications/1206015.pdf>).

We also intend that this dEA will be used to support Section 7 Endangered Species Act (ESA) consultation for our vernal pool wetland habitat enhancement and restoration. All of the areas identified for restoration and enhancement support one or more threatened or endangered species, including: California gnatcatcher (*Polioptila californica californica*), San Diego fairy shrimp (*Branchinecta sandiegonensis*), San Diego button celery (*Eryngium aristulatum* var. *parishii*), and San Diego mesa mint (*Pogogyne abramsii*). We believe we can generally avoid adverse effects to these species, however, some vernal pool enhancement work could displace plant seeds and fairy shrimp cysts during recontouring work.

Restoration disturbance may also occur in areas occupied by California gnatcatchers. Our hope is to address the Section 7 ESA consultation needs of all federal agencies involved jointly.

Your timely response to this request is needed for our ongoing planning. We request your response and comments by 1 August. We would like to schedule a site visit and discussions with you about the mitigation agreement documents needed during July.

If you have any questions or would like schedule a site visit, our point of contact is Mr. David Boyer, Natural Resources Division Director, at (858)577-1125 or by e-mail at [david.a.boyer1@usmc.mil](mailto:david.a.boyer1@usmc.mil).

Sincerely,



E. S. BENJAMIN  
Lieutenant Colonel, U.S. Marine Corps  
Environmental Management Officer  
By direction of the Commanding Officer

Enclosure: Draft Environmental Assessment

Copy to: HQ, USMC (MCICOM/GF-7) w/o enclosure  
MCI-West (Env.Sec./NEPA) w/o enclosure

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# **Appendix B**

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## **Stakeholder Meeting**

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# Developing a Vernal Pool Mitigation Bank on MCAS Miramar

## Stakeholder Meeting

## Final Meeting Minutes

**Date:** 20 February 2013

**Time/Place:** 0900-1200 Marine Corps Air Station (MCAS) Miramar, Environmental Conference Room.

**Attendees:** See attached attendance list.

### 1. Purpose of the Meeting

- Present an overview of mitigation banking (or some type of “advanced mitigation”) and the proposed project to MCAS Miramar leadership and stakeholders.
- Receive agency perspectives on the proposed project.
- Collaborate with stakeholders to develop siting alternatives for the National Environmental Policy Act (NEPA) document that are mission-compatible and feasible.

### 2. Agenda

0900-0915	Introductions, Welcome
0915-0945	Project Description - Dave Boyer (MCAS Miramar EMD)
0945-1000	Agency Perspective
1000-1015	NEPA and Exercise Introduction - Rachele Hill (NAVFAC SW) Co-project Manager
1015-1045	Break-out SME review of additional constraints
1045-1130	Info Roll-up and Determination of Alternatives
EMD - Environmental Management Division NAVFAC SW - Naval Facilities Engineering Command Southwest SME – Subject Matter Expert	

### 3. Stakeholder Presentation

#### Part 1 - Project Overview (original attached).

- Question was raised as to what the financial benefits of advanced mitigation planning are.
  - Mr. Boyer responded that advanced mitigation streamlines regulatory process and therefore time commitment of staff as well as project schedule. He also noted that advanced mitigation can reduce compensatory mitigation rations requested by agencies.
  - Ryan Orndorff also noted that advanced mitigation can dramatically reduce the per acre cost for mitigation and provided an example of \$10K - \$15K/acre as part of advanced mitigation versus \$40K - \$50K/acre associated with project-specific mitigation.
  - Mr. Orndorff also noted that other Marine Corps installations have received Operations and Maintenance (O&M) funds for advanced mitigation projects.
  - Comment was also made that advanced mitigation may alleviate mitigation cost pressures on individual project proponents.

- A final comment noted that without advanced mitigation, projects would have to individually fund an entire mitigation project to compensate for its impacts. For smaller projects, this has the potential for a project to exceed the cost threshold for it to become a Military Construction Project, thus requiring congressional approval.
- Mr. Boyer emphasized that there is not enough funding to complete an entire advanced mitigation project at one single time; time-phasing will be required.

Part 2 – NEPA Alternatives and Development (original attached).

- Ms. Hill emphasized NEPA as a process law covering potentially all the phases of an advanced mitigation project.
- Ms. Bartels reiterated the importance of sites having a connection to Traditional Navigable Waters for Clean Water Act (CWA) jurisdiction. See Item 4, Summary of Agency Perspective for more details.

#### **4. Summary of Agency Perspective**

U.S. Army Corps of Engineers (USACE; Peggy Bartels - Regulatory Project Manager) -

- There are no CWA/Endangered Species Act conservation/mitigation banks in southern California.
- The project is beneficial to both the mission and the resources themselves and is on the right track.
- The project really needs to identify and establish sites that will have a connection to Traditional Navigable Waters so that CWA jurisdiction can be established.
- Colleen Eckenroad (MCB Camp Pendleton Environmental Security) asked whether vernal pool preservation would also provide credit.
  - The response from USACE was that preservation credit should be considered here but that the actual preservation would be small compared to new pool development.

Environmental Protection Agency (Elizabeth Goldmann - Water Quality/CWA Permit Oversight; Interagency Review Team) -

- There are tremendous advantages to going through this process now, including establishing a framework and expectations for mitigation in advance and expediting future agency approvals later.

#### **5. Break-out SME Review and Alternatives Development Results**

Description of Break-out SME Review

- MCAS Miramar EMD staff and the NEPA team identified preliminary screening criteria, preliminary list of no-go areas, and a list of known site development considerations for stakeholder review/concurrence. These resources were mapped and presented graphically to the stakeholders for their review during the break-out SME review.
- Ms. Hill emphasized site-accessibility and future projects as information that may have been limited during the preliminary analysis, but also requested a review of missing data regarding infrastructure, mission operation constraints, or other concerns.

- Stakeholder group was asked to further refine potential pool development areas based on their area of expertise.

Screening criteria - The following screening criteria were given to the stakeholder group as a basis for alternatives development:

- Maximum density of potential vernal pool creation;
- CWA jurisdiction;
- Existing vernal pools that may be incorporated for preservation credit;
- Aircraft accident potential zone overlay;
- Additional community planning purposes are served such as encroachment buffer or maximum use of sites where no other use could be feasibly supported; and,
- Long-term management potential to ensure avoidance of future land use conflicts.

Potential Suitable Mitigation Area Alternative Development Results -

- Several areas were confirmed by stakeholders as non-suitable, including:
  - Flightline/Main Station;
  - Existing Mitigation Areas;
  - Training Areas;
  - Future developments including the Veterans Affairs Cemetery and City of San Diego lease expansion around the landfill for monitoring wells;
  - Leases, outgrants, easements, and rights-of-way;
  - private land inholdings (and adjacent area subject to restoration at the Harris Plant); and,
  - “G” parcel subject to special authorization to transfer to the Department of Interior (U.S. Fish and Wildlife Service National Wildlife Refuge system) in the south-central part of the station.
- Six locations were identified as potential mitigation bank sites (Alpha, Bravo, Charlie, Delta, Echo, and Foxtrot). An overview map of the stakeholder-identified potential suitable mitigation areas is included as Map 1, *Vernal Pool Mitigation Bank Development Sites*. Maps 2 through 4 present the same information at a smaller scale.

Potential NEPA Alternatives Identified -

- Alternative 1 – All sites: Alpha, Bravo, Charlie, Delta, Echo, and Foxtrot.
- Alternative 2 – To be determined.
- Alternative 3 – To be determined.
- No Action Alternative.

## 6. Action Items

<b>Action</b>	<b>Organization</b>	<b>Status</b>
Develop Maps of Potential Bank Locations based on Stakeholder Meeting	SAIC	<b>Complete</b>
Review/revise potential pool development areas within the identified pool development site alternatives	MCAS Miramar EMD	<b>Complete</b>
Provide project description and methods information from existing vernal pool developments at MCAS Miramar	MCAS Miramar EMD	<b>Complete</b>
Provide information, environmental documents, or other materials from other USMC mitigation bank projects	MCAS Miramar EMD	<b>Complete</b>
NEPA Alternatives follow-up Meeting	NAVFAC SW, SAIC, MCAS Miramar EMD	Thursday, 7 March 2013

## Attachments

- Sign-in Sheet.
- Presentation Part 1: Project Overview.
- Presentation Part 2: NEPA Alternative Development.
- Potential Development Areas Suitable for Mitigation: Maps 1 to 4.

Vernal Pool Mitigation Bank Development

Stakeholder/Scoping Meeting

20 February 2013

checked PD  
were present

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<i>Orndorff, Ryan</i>	<i>MCI/COM (HQ)</i>	<i>Nat. Res Mgr</i>			<i>called in</i>

Please note any appropriate corrections to the above.

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# **Appendix C**

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**Record of Non-Applicability (RONA)**

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## Appendix C. United States Marine Corps Record of Non-Applicability (RONA) for Clean Air Act Conformity and Air Quality Emissions Estimates

### 1 Introduction

2 This proposed action falls under the Record of Non-Applicability (RONA) category and is documented  
3 with this RONA.

4 The United States Environmental Protection Agency (EPA) published “Determining Conformity of  
5 General Federal Actions to State or Federal Implementation Plans; Final Rule” in the 30 November 1993  
6 Federal Register (40 Code of Federal Regulations [CFR] Parts 6, 51, and 93). In 2006, the EPA revised  
7 the general conformity rule to include *de minimis* emission levels for particulate matter with a diameter  
8 equal to or less than 2.5 microns (PM<sub>2.5</sub>) and its precursors. On 5 April 2010, EPA finalized more wide-  
9 sweeping revisions to the general conformity rule (75 Federal Register [FR] 17253-17279). These  
10 revisions took effect on 6 July 2010. These publications provide guidance on how to document Clean Air  
11 Act Conformity requirements.

12 Federal regulations state that no department, agency, or instrumentality of the Federal Government shall  
13 engage in, support in any way or provide financial assistance for, license to permit, or approve any  
14 activity that does not conform to an applicable State Implementation Plan (SIP). It is the responsibility of  
15 the Federal agency to determine whether a Federal action conforms to the applicable SIP before the action  
16 is taken (40 CFR Part 1 51.850[a]).

17 Federal actions are exempt from conformity determinations if their emissions do not exceed designated  
18 *de minimis* levels for criteria pollutants (40 CFR 93.153c). The general conformity rule also exempts  
19 certain federal actions from the requirements of the rule, as these actions are assumed to conform to a SIP.  
20 Conformity *de minimis* levels (in tons per year) for the San Diego Air Basin, the region potentially  
21 affected by the proposed action, are listed in Table 1.

<b>Table 1. Conformity De Minimis Levels for Criteria Pollutants in the San Diego Air Basin</b>	
Criteria Pollutant	De Minimis Level (tons/year)
Carbon Monoxide (CO)	100
Volatile Organic Compounds (VOC)	100
Oxides of Nitrogen (NO <sub>x</sub> )	100

### 22 Proposed Action

23 Activity: Develop and operate vernal pools as mitigation areas at Marine Corps Air Station Miramar  
24 (MCAS Miramar). Proposed action proponent is the Public Works Department at MCAS Miramar.

25 Location: MCAS Miramar, California. Proposed activities would occur along De La Garza Road located  
26 in West Miramar.

27 Proposed Action Name: Vernal Pool Conservation/Mitigation Bank Planning at MCAS Miramar.

28 Proposed Action Summary: The Marine Corps proposes to create, restore, enhance, and operate (maintain  
29 and monitor) potentially up to 22 acres of vernal pools at various locations within MCAS Miramar. Creation

1 of new sites would require clearing of vegetation and grading to create new basins through soil  
2 re-contouring. Excavated material from new basin areas would typically be used on-site to create upland  
3 mounds. Any debris associated with site preparation and soil re-contouring would be removed and  
4 transported to a permitted, off-site disposal site. Site preparation and soil re-contouring associated with  
5 restoration/enhancement of existing basins would be done carefully with small-scale equipment or hand  
6 tools. The project sites would be accessed by existing roads when feasible and by transiting fence line  
7 security clear zones. Access roads may be required for sites that do not have existing access roads or  
8 suitable access. Other development activities would include placement of inoculum in pools (soil  
9 containing fairy shrimp cysts<sup>1</sup> and plant seeds) and weed/exotic plant control and removal.

10 Operational activities (maintenance and monitoring) would require the occasional use of light duty  
11 vehicles and equipment.

12 Air Emissions Summary: Based on the air quality analysis for the proposed action, the emissions for the  
13 proposed action would be well below conformity *de minimis* levels.

14 Affected Air Basin: San Diego Air Basin

15 Date RONA Prepared: November 22, 2013

16 RONA Prepared by: Science Applications International Corporation (SAIC)

## 17 **Proposed Action Exemptions**

18 The proposed action is exempt because the estimated total emissions are below *de minimis* levels set forth  
19 in the Clean Air Act General Conformity Regulation.

## 20 **Attainment Status and Emissions Evaluation and Conclusion**

21 The General Conformity Rule requires conformity evaluations for proposed emissions that would occur  
22 within areas that are in nonattainment or maintenance of a national ambient air quality standard (NAAQS).  
23 The project site is within San Diego County and is under the jurisdiction of the San Diego County Air  
24 Pollution Control District. Therefore, the focus of this conformity applicability analysis is to compare  
25 project emissions to *de minimis* levels applicable to San Diego County.

26 The San Diego Air Basin (SDAB) presently is classified as in nonattainment of the O<sub>3</sub> NAAQS. Ozone is  
27 a secondary pollutant formed when ozone precursors, nitrogen oxides (NO<sub>x</sub>) and volatile organic  
28 compounds (VOCs), intermix in the atmosphere in the presence of sunlight. Therefore, the EPA general  
29 conformity regulations set *de minimis* levels for ozone precursors instead of ozone. The western portion  
30 of the SDAB (the portion of the county generally west of the interior desert region) also is in maintenance  
31 of the CO NAAQS. Based upon these designations, the applicable annual conformity *de minimis* thresholds  
32 for these areas are 100 tons of VOCs, CO, and NO<sub>x</sub>.

33 Equipment usages associated with the potential development of vernal pools by the proposed action and  
34 their resulting emissions are not known at this time. However, the proposed action would minimize ground  
35 disturbances, which would minimize equipment usages needed for the development of vernal pools. This  
36 approach would produce annual air emissions that would be substantially less than their applicable

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<sup>1</sup> Fairy shrimp cysts can accumulate in the soil after several years of reproduction. Cyst banks resemble the seed banks of animals and plants. Cysts that are near the soil surface are available for hatching. The cyst bank is generally present in a few centimeters of soil.

1 conformity *de minimis* threshold. Maintenance and monitoring activities associated with the proposed  
2 action would produce minor amounts of air emissions due to the occasional use of light duty vehicles and  
3 equipment. As a result, this activity would produce annual air emissions that would be substantially less  
4 than their applicable conformity *de minimis* threshold. Therefore, emissions from the proposed action  
5 would show conformity under the Clean Air Act, as amended.

6 **RONA Approval**

7 I concur in the finding that air emissions associated with the proposed action are below *de minimis* levels  
8 and therefore do not require further conformity evaluation.

Date: \_\_\_\_\_

9  
10 \_\_\_\_\_  
11 *Name of Responsible Official*  
12 *Title of Responsible Official*  
MCAS Miramar

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