

**UNITED STATES MARINE CORPS
RECORD OF NON-APPLICABILITY FOR CLEAN AIR ACT
CONFORMITY AND AIR QUALITY
EMISSIONS ESTIMATES**

Introduction

This Proposed Action falls under the Record of Non-Applicability (RONA) category and is documented with this RONA.

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

Federal actions are exempt from conformity determinations if their emissions do not exceed designated *de minimis* levels for criteria pollutants (40 CFR Part 93.153c). The General Conformity Rule also exempts certain federal actions from the requirements of the rule, as these actions are assumed to conform to a SIP. Conformity *de minimis* levels (in tons/year) for the San Diego Air Basin (SDAB), the region potentially affected by the Proposed Action, are listed in Table 1.

**Table 1. Conformity De Minimis Levels for Criteria Pollutants in the
San Diego Air Basin**

<i>Criteria Pollutant</i>	<i>De Minimis Level (tons/year)</i>
Carbon Monoxide (CO)	100
Volatile Organic Compounds (VOC)	100
Oxides of Nitrogen (NO _x)	100

Proposed Action

Activity: Under the Proposed Action, the existing flood control structure (i.e., levee, floodwall, and stormwater management system) would be repaired to address the known deficiencies of the system outlined in Section 1.3.3.4 of the Environmental Assessment. The Proposed Action consists of physical repairs to the existing system that would be constructed, and long-term inspections and maintenance practices.

Location: The Proposed Action would be implemented at Marine Corps Air Station (MCAS) Camp Pendleton and Marine Corps Base (MCB) Camp Pendleton, California (CA), approximately 35 miles (56 kilometers) north of San Diego. MCAS Camp Pendleton is located within MCB Camp Pendleton and covers an approximately 474-acre (ac) (192-hectare [ha]) area bordered on the north to southwest by the Santa Margarita River; on the south and southeast by Vandegrift Boulevard; and on the east and northeast by Basilone Road. MCB Camp Pendleton comprises approximately 125,000 ac (50,000 ha), is located within San Diego County, and is bordered by the city of San Clemente and Orange County to the northwest, the city of Oceanside to the south, the community of Fallbrook to the east, and the Pacific Ocean to the west. The project area is located along and includes the existing flood control structure that was completed in 2000.

Proposed Action Name: Levee Repair and Maintenance Environmental Assessment at Marine Corps Air Station Camp Pendleton, California.

Proposed Action Summary: Under the Proposed Action, the levee and floodwall completed in 2000 would undergo repair and ongoing maintenance to provide continuous long-term protection to MCAS Camp Pendleton and other United States Marine Corps (USMC) assets from flooding under the 100-year flood event. The USMC has identified two action alternatives (Alternatives 1 and 2) as meeting the reasonable screening factors. The two action alternatives would both include: filling and sealing cracks in the Air Station Segment of the levee; establishing a permanent gravel access path along the riverside of the levee/floodwall; removing vegetation on the levee and within the 15-foot (5-meter) vegetation clear zone on both sides of the levee and floodwall; removing or filling the toe drain with grout; and ongoing inspection and maintenance of the flood control structure. The primary difference between the action alternatives is related to how to address the deficiencies in the existing protective riprap revetment on the riverside of the levee and floodwall:

- Alternative 1: The entire existing riprap revetment would be excavated and replaced with a well graded riprap that would perform better against scour.
- Alternative 2: Launchable riprap would be placed on top of the existing riprap revetment to resist scour.

Air Emissions Summary: Based on the air quality analysis for the Proposed Action, the emissions for the Proposed Action would be well below conformity *de minimis* levels. Attachment (1) of this RONA presents the air emission calculations for the Proposed Action (Preferred Alternative – Alternative 2).

Affected Air Basin: SDAB

Date RONA Prepared: 31 January 2019

RONA Prepared By: Leah Gonzales and Caitlin Jafolla, Cardno

Proposed Action Exemptions

The Proposed Action is exempt because the calculated total emissions are below *de minimis* levels set forth in the Clean Air Act General Conformity Regulation.

Attainment Status and Emissions Evaluation and Conclusion

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

The SDAB presently is classified as in nonattainment (moderate) for the 8-hour federal ozone (O₃) standard. Ozone is a secondary pollutant formed when O₃ precursors, nitrogen oxides (NO_x) and volatile organic compounds (VOCs) combine in the atmosphere in the presence of sunlight. Therefore, the United States Environmental Protection Agency general conformity regulations set *de minimis* levels for O₃ precursors instead of O₃. The SDAB also is in maintenance (moderate) for carbon monoxide (CO). Based upon these designations, the applicable annual conformity *de minimis* thresholds for these areas are 100 tons of VOCs, NO_x, and CO.

Table 2 summarizes the conformity-related emissions that would occur from Alternative 1 within the San Diego County project region. The main sources of conformity-related emissions associated with the project construction would include combustive emissions due to the use of fossil fuel-powered construction equipment. Inspections and maintenance (primarily vegetation clearing with weed whackers) would occur

under either action alternative; however, air emissions would be negligible compared to the existing conditions and would not result in significant long-term increases in air emissions. The data show that conformity-related emissions for Alternative 1 would be well below the applicable *de minimis* levels. Therefore, emissions from Alternative 1 would show conformity under the Clean Air Act, as amended.

Table 2. Annual Conformity-Related Emissions –Alternative 1

Activity	Air Pollutant Emissions (tons/year)		
	VOCs	NO _x	CO
Construction Emissions - 2020 (tons/year)	0.32	3.33	2.73
Construction Emissions - 2021 (tons/year)	0.25	2.45	1.78
Conformity <i>de minimis</i> Levels (tons/year)	100	100	100
Exceeds Conformity <i>de minimis</i> Levels?	No	No	No


Table 3 summarizes the conformity-related emissions that would occur from Alternative 2 (Preferred Alternative) within the San Diego County project region. The main sources of conformity-related emissions associated with the project construction would include combustive emissions due to the use of fossil fuel-powered construction equipment. The data show that conformity-related emissions for Alternative 2 would be well below the applicable *de minimis* levels. Therefore, emissions from Alternative 2 would show conformity under the Clean Air Act, as amended.

Table 3. Annual Conformity-Related Emissions –Alternative 2

Activity	Air Pollutant Emissions (tons/year)		
	VOCs	NO _x	CO
Construction Emissions - 2020 (tons/year)	0.30	3.08	2.60
Construction Emissions - 2021 (tons/year)	0.18	1.81	1.37
Conformity <i>de minimis</i> Levels (tons/year)	100	100	100
Exceeds Conformity <i>de minimis</i> Levels?	No	No	No

RONA Approval

I concur in the finding that air emission associated with the Proposed Action are below *de minimis* levels and therefore do not require further conformity evaluation.



 Signature

4 Oct 2023

 Date

David B. Moore
 Colonel, U.S. Marine Corps
 Commanding Officer
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