

**RECORD OF NON-APPLICABILITY
FOR CLEAN AIR ACT CONFORMITY**

**FORT ROSECRANS NATIONAL CEMETERY ANNEX
SAN DIEGO, CALIFORNIA**

Prepared for:

Department of the Navy
and
Department of Veterans Affairs

July 2007

RECORD OF NON-APPLICABILITY (RONA) FOR CLEAN AIR ACT CONFORMITY

INTRODUCTION

The U.S. Environmental Protection Agency (USEPA) published "Determining Conformity of General Federal Actions to State or Federal Implementation Plans; Final Rule," in the 30 November 1993, Federal Register (40 CFR Parts 6, 51, and 93). 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 implementation plan. It is the responsibility of the Federal agency to determine whether a Federal action conforms to the applicable implementation plan, before the action is taken (40 CFR Part 1 51.850[a]).

MCO 5090.2A, *Environmental Compliance and Protection Manual*, in Sections 6104, 6203, and 6302 and Chapter 12 provide direction and guidance for compliance with Clean Air Act conformity requirements. This Record of Non-Applicability is provided to document compliance for the proposed project.

Federal actions may be exempt from conformity determinations if they do not exceed designated *de minimis* levels for criteria pollutants (40 CFR Part 51.853[b]). *De minimis* levels (in tons/year) for the air basin potentially affected by the Proposed Action are listed in Table 1.

Table 1
General Conformity Rule De Minimis Limits

Pollutant	Emissions (tons/year)
CO	100 ¹
NO _x	100 ²
ROG	100 ²

Source: USEPA 1993; CNO 2002

¹ Attainment/maintenance area for CO.

² Basic nonattainment area for 8-hour O₃

PROPOSED ACTION

Activity: Construction and operation of a national cemetery annex at Marine Corps Air Station Miramar, San Diego, California.

Proposed Action Name: Fort Rosecrans National Cemetery Annex, San Diego, California.

Proposed Action Summary: The purpose of the Proposed Action is to meet the mission of the United States Department of Veterans Affairs (VA) National Cemetery Administration to provide needed burial space on federal land for military veterans in the San Diego area. The Proposed Action is a land use agreement between the VA and the Department of the Navy for the construction and operation of an annex to the existing Fort Rosecrans National Cemetery to serve veterans in the San Diego area. Two alternate sites were considered, identified as Site 2 and Site 4. The Site 2 Alternative (Preferred Alternative) would have a developed area of 214 acres (87 hectares), and a potential capacity of 50,000 casketed gravesites and 40,000 columbarium niches. Site development would occur in four phases, constructed at approximately 10-year intervals, starting in 2008. The Site 4 Alternative would be considerably smaller and would have a developed area of 90 acres (36 hectares), and a potential capacity of 31,000 casketed gravesites and 26,000 columbarium niches.

Air Emissions Summary: Based on the air quality analysis for the Site 2 Alternative, the average annual emissions during the 40-year construction and operations period would be below General Conformity *de minimis* levels (Table 2). The period of greatest emissions for each of the pollutants would be 2008, with combined construction and operations emissions. All annual emissions would be less than 20 percent of the applicable *de minimis* thresholds and less than 10 percent of the forecast area emissions. Because the Site 4 Alternative would be less than one-half the size of the Site 2 Alternative, and there are no significant differences between the sites in topography or development density, it is concluded that all emissions for the Site 4 Alternative would be less than 20 percent of the applicable *de minimis* threshold and less than 10 percent of the forecast area emissions.

**Table 2
Combined Emissions, Site 2, General Conformity**

Year	Pollutant emissions – tons per year		
	ROG	NO _x	CO
2008	2.13	9.39	17.89
2009	2.27	7.85	16.00
2010	0.68	0.54	5.67
2015	0.64	0.57	5.97
2018 ¹	2.06	8.81	17.97
2019 ¹	2.23	7.51	16.34
2020	0.79	0.58	6.83
2025	0.70	0.52	6.26
2028 ²	2.07	8.72	17.88
2029 ²	2.26	7.44	16.24
2030	0.83	0.50	6.92
2035	0.75	0.43	6.57
2038 ³	2.10	8.63	18.15
2039 ³	2.28	7.35	16.49
2040	0.86	0.41	7.22
General Conformity de minimis Thresholds⁴	100	100	100
Exceed Threshold?	No	No	No
SDAB forecast annual emissions ⁵	90,301	248,675	59,714
Exceed 10 percent of SDAB emissions?	No	No	No

Bold – maximum annual emissions for each pollutant.

¹ Phase 2 construction plus operations

² Phase 3 construction plus operations

³ Phase 4 construction plus operations

⁴ *De minimis* thresholds for San Diego Air Basin: Basic nonattainment O₃ (8-hour) precursors ROG and NO_x, and attainment/maintenance CO pollutants.

⁵ Emissions forecast for 2020, from CARB 2006.

Date RONA Prepared: 16 July 2007.

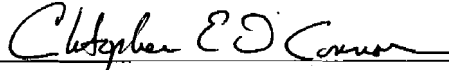
EMISSIONS EVALUATION CONCLUSION

The Department of the Navy concludes that *de minimis* thresholds for applicable criteria pollutants would not be exceeded nor would the projected emissions be regionally significant (i.e., greater than 10 percent of the air basins' emission budgets) as a result of implementation of the Proposed Action. The emissions summary supporting that conclusion is shown in Table 2

and the calculation methodology, calculation data, and references are included in Attachment 1. Therefore, the Department of the Navy concludes that further formal Conformity Determination procedures are not required, resulting in this RONA.

RONA APPROVAL

To the best of my knowledge, the information presented in this Record of Non-Applicability is correct and accurate and I concur in the finding that the Proposed Action is not subject to the General Conformity Rule.



Christopher E. O'Connor
Colonel, US Marine Corps
Commanding Officer
Marine Air Corps Station Miramar

25 July 2007
Date

RONA
ATTACHMENT 1

1. Air Quality Methodology
2. References

1. Emission Methodology and Calculations

Construction emissions have been evaluated by use of the URBEMIS 2002 software package, version 8.7. The emission factors and calculation methodologies contained in the URBEMIS 2002 program are based on USEPA methodologies and have been approved for use by the California Air Resources Board. URBEMIS is a calculation tool designed to estimate air emissions from land use development projects based on development type and size. The model contains data that is specific for each California air basin. The URBEMIS 2002 output data follow.

2. References

State of California, Air Resources Board (CARB)

2006 Regional Emissions Data, available at <http://www.arb.ca.gov/ei/emissiondata.htm>

U.S. Department of the Navy (U.S. Navy)

2002 Chief of Naval Operations (CNO). OPNAVINST 5090.1B CH-3, Appendix F. *Clean Air Act General Conformity Guidance*. October.