Public Comments Received between March 27, 2015 to April 16, 2015

From: Amy Anderson
Sent: Monday, April 6, 2015 5:40 PM
To: CEQA contact
Subject: GHG Threshold Levels

Controlling greenhouse gas emissions worldwide will determine our collective fate as a species. That's why I'm advocating for a zero net increase in emissions.

Scientists and mathematicians estimate that we have to keep at least 80% of our current gas, oil, and coal reserves in the ground, or face, within 13 short years, an increase in global temperature far above the widely accepted maximum sustainable figure of 2 degrees Celsius.

On top of that, locally we're facing a record drought, and NASA scientists tell us that California has just one year of water in reserve. The energy that produces the least greenhouse gases is also the energy that takes the least water. Wind power requires no water, and solar takes just a fraction of the water of oil and gas production. So requiring a zero increase in the greenhouse gas threshold also encourages the use of forward thinking, green technology, enabling us to thrive in difficult times.

If another threshold is used, it should be much lower than 10,000 metric tons; it should be low enough to capture 95% of future emissions.

The situation could really not be more urgent.

Please act locally by refusing to allow any increase in greenhouse gas emissions in our county and increasing the amount of clean, renewable energy used here instead.

Thank you,

Amy Anderson
Santa Maria, CA

DEPARTMENT OF THE AIR FORCE
30TH SPACE WING (AFSPC)

14 April 2015

MEMORANDUM FOR SANTA BARBARA COUNTY
AIR POLLUTION CONTROL DISTRICT
ATTN: MOLLY PEARSON

FROM: 30 CES/CEIEC
1028 Iceland Avenue
Vandenberg AFB CA 93437-6010

SUBJECT: Vandenberg Air Force Base Comments to the Proposed Revisions to the District's Environmental Review Guidelines Addressing Greenhouse Gas Emissions under the California Environmental Quality Act

Vandenberg Air Force Base is pleased to submit the attached comments to the subject proposed revisions. If you have questions regarding these comments please contact me at (805) 606-0016 or Kim Harding at (805) 606-6863.

ANDREW P. EDWARDS
Chief, Environmental Compliance
Asset Management Flight

Attachments:
1. VAFB Comments

Vandenberg AFB comments to Proposed Revisions to the District's Environmental Review Guidelines Addressing GHG Emissions under CEQA

Staff Report, Page 3-9	Please explain the federal permitting thresholds referred to that support the high 100,000 MT/year threshold for Mojave and Antelope Valley air districts.
Recommendation	Request adjusting the threshold and/or screening level for USAF projects to 25,000 MT/year CO2e, which is based on the President's Council on Environmental Quality draft guidance on greenhouse gas (GHG) emissions. (79 Federal Register 77802, Dec. 24, 2014) Although we acknowledge that the CEQ did not formally establish a federal GHG-threshold under NEPA, federal agencies like the USAF at VAFB retain discretion is establishing / setting thresholds under NEPA to evaluate the potential significance of proposals. The USAF at VAFB does not currently prepare CEQA documents and uses the 25,000 MT/year CO2e as a significance threshold for analyzing GHG impacts in VAFB NEPA documents. Please refer to our discussion below regarding the Staff Report, Environmental Review Guidelines, Article V, Page 13
Staff Report, Page 6-8, Section 6.1.2	Explain how the District will interpret "projects" in light of the unique structure of the VAFB stationary source. The District requires Non-USAF Government agencies at VAFB to be included in the VAFB stationary source and Title V permit. Given the Base Commander has no control over these agencies and their missions, are projects related to their activities going to be analyzed as separate projects or included as cumulative impacts with Air Force projects?
Staff Report, Page 6-15, Section 6.2	Explain what mitigation options are available to sources specifically exempt from Cap and Trade and who are not able to meet the 15.3% reduction specified in the AB32 Consistency option due to national security requirements (i.e. only diesel-fired generators are authorized to supply critical facility emergency back-up power). Under the California Air Resources Board (CARB) cap and trade regulation section: § 95852.2(c) (Other Exemptions), the operators of facilities with any of the following activities are exempt from compliance with this article: (1) NAICS Code 92811. (The NAICS Code 92811 is described as National Security)
Staff Report, Environmental Review Guidelines Article V, Page 13	Explain how the SBCAPCD will calculate GHG emissions for a project. The revised guidelines state that annual emissions of a project that exceed the threshold would result in "cumulatively considerable contribution of GHG emissions and a cumulatively significant adverse environmental impact." If the USAF at VAFB proposes a project with a potential to emit that results in less than 10,000 MT/year CO2e, would those emissions be added to the VAFB actual emission GHG baseline of 16,282 MT/year CO2e and result in a finding of significant impact? If yes, it appears that any permit application by VAFB would result in significant impacts thereby requiring an Environmental Impact Report (EIR) with overriding considerations or mitigation to avoid preparation of an EIR under CEQA. Please clarify. If VAFB proposes to install two boilers, each rated at 10.1 MMBtu/hr, over the course of two years, one on the South Base and one on the North Base in support of two totally separate missions, would the APCD cumulatively add these together and require CEQA mitigation following the permitting of the second boiler since the first boiler meets the

	exemption specified in Appendix A?? Or, is the proposed revision stating that consideration of a project's direct and indirect GHG emissions is all that is required since GHG impacts are cumulative by nature thus no need for further analyses of cumulative effects to determine significance?
Staff Report, Environmental Review Guidelines, Article V, Page 13	Request revision to Option B, 2nd & 3rd sub-bullets to acknowledge federal plans, programs and/or requirements as being consistent with AB 32 and/or California Air Resources Board's (CARB) C&T Program. Consider the 2010 Executive Order (EO) 135149 that requires the federal government to reduce GHG emissions by 28% by 2020 In comparison, AB 32 called for a reduction of GHG emissions to 1990 levels by 2020, which would be a 16% reduction. In addition, the Air Force Energy Plan for 2010 contains specific goals to be achieved by 2030. As stated, this Energy Plan is intended to aid in GHG mitigation. Also, in June 2012, Headquarters Air Force issued the "Net Zero" Energy, Water, and Waste Policy (i.e., as to energy this policy includes a requirement to increase generation of renewable energy). Most recently the President has issued EO 199999 that, re-iterates the need to reduce GHGs by setting updated reduction goals for 2025 (March 19, 2015). VAFB has already made progress in reducing GHG emissions that are not accounted for in AB32 emission reductions. Would the APCD consider this as an approved GHG emission reduction plan? The USAF at VAFB currently reports to CARB under the MRR, which has a threshold of 10,000 MT/year CO2e. The USAF complies with relevant regulations to achieve GHG emission reductions that are part of CARB's Climate Change Program. These regulations include mitigation of GHG emissions and/or substances with high global warming potential at VAFB. Namely, removal of electrical switchgear using SF6 is decreasing each year as well as phasing out R-22 equipment (refrigerant/ozone depleting substance). Also, the VAFB Landfill is reducing operations thereby causing a reduction in methane emissions. In addition, the USAF at VAFB is investigating the use of a solar array system to increase its use of renewable energy. This effort may mitigate existing GHG emissions at VAFB if the use of natural gas, for example, is reduced as a result of the project. Compare Option B ("THRESHOLD BASED ON CONSISTENCY WITH AB 32") with the VAFB situation. VAFB has much lower than 25,000 MT/year CO2e and are mitigating GHG emission because of state (CARB) *and* federal mandates; the federal mandates appear more stringent than AB 32. If enrollment in CARBs Cap and Trade(C&T) Program is sufficient mitigation for exceeding the 10,000 MT/year threshold because that program mandates reduction, then we suggest that the same logic should be extended to federal programs that mandate the USAF to reduce GHGs. As detailed above, this appears to meet the spirit of consistency with meeting the AB 32 Scoping Plan GHG emission reductions 15.3% below business as usual. As to mitigation, it seems unfair to allow a potentially high polluter (more than 25,000 MT CO2e/year to not pay additional mitigation by virtue of being enrolled in the CARB C&T Program, but impose additional mitigation on a

	lesser emitter that is already reducing emissions despite not being enrolled in the C&T Program. This would especially be unfair if the rate of reduction in the C&T Program is lesser than the rate of reduction of an entity like VAFB.
Staff Report, Environmental Review Guidelines, Article V, Page 13, Option B.	Revise Option B to permit the SBCAPCD to retain discretion in finding a GHG impact significant. Specifically, recommend changing the language between the bullets from "or" to "and/or." Rather than establishing a bright line rule above which mitigation is required, 10,000 MT/year CO2e, focus on the efforts made to reduce GHG emissions by the specific entities as a whole in determining whether additional mitigation should be imposed. As discussed above, the USAF is making efforts to reduce GHG emission, but the results of those efforts will take time to manifest themselves (i.e., GHG emissions are reported once a year to CARB).
Staff Report, Environmental Review Guidelines, Article V, Page 13.	What is the time frame for achieving the 15.3% reduction under Option B, 3rd bullet? It might not be possible to require an entity to reduce GHG impacts by that percentage within a short period of time.
Staff Report, Environmental Review Guidelines, Appendix A, Page 27	Clarify the significance of removing the term "facility". Also, please define the term source. This is confusing since federal and state law uses term 'source' under the CAA whereas EPA and CARB GHG regulations use 'facility.' This section of the document also retains the term facility in paragraph 1.a. but deletes it elsewhere in the Appendix.
Staff Report, Environmental Review Guidelines, Appendix A, Page 27	Please include the CEQA Statutory Exemption for the issuance, modification, amendment, or renewal of Title V permits into the SBCAPCD's Environmental Review Guidelines consistent with the CEQA Guidelines, Section 15281. This will reduce confusion for the USAF at VAFB since issuance of a permit is technically within the scope of the definition of a project under CEQA. Also, please explain how the SBCAPCD currently interprets CEQA Statutory Exemption for Title V permits. The Exemption appears all-encompassing of any action that would normally be associated with a Title V permit.
Staff Report, Environmental Review Guidelines,	It appears that paragraph 1.d. exempts permitting of sources that lose an exemption to APCD Rule 202 (Permit Exemptions). Are projects that install equipment that meet the Rule 202 exemptions also categorically exempt from CEQA? Please clarify that the installation of new tactical support equipment registered in the CARB PERP is exempt from the CEQA Guidelines pursuant to Appendix A.

Appendix A, Page 28.	
March 25, 2015 Public Workshop Handout	Recommend providing the “white paper” describing implementing mitigation measures as discussed on slide 23 of the workshop handout to the regulated community for review and public comment prior to presenting the selected option to the Board.

From: Dunn, Matt <matt.dunn@aecom.com>
Sent: Thursday, April 16, 2015 9:21 AM
To: CEQA contact
Subject: FW: comment from CAC memeber

Matt Dunn (member of the CAC)
Principal Engineer

matt.dunn@aecom.com

From: Dunn, Matt [mailto:matt.dunn@aecom.com]
Sent: Thursday, April 16, 2015 7:27 AM
To: Dave Van Mullem; Ben Ellenberger
Subject: comment from CAC memeber

In advance of today's Board meeting agenda item, I wanted correct the record on a couple CAC items and stray comments discussed for the GHG CEQA guidelines last month.

1) Of the seven >25,000 MT CO2/y emitters in the staff report , only 4 of them of Cap and trade regulated. Landfills are not in Cap and Trade. It is implied at the CAC meeting, all were.
2) Ambient CO2 is not measured by APCD as suggested by a commenter . NOAA does that and the APCD is not negligent is this matter.
3) There was no discourse at the CAC level on the 1000 to 10000 MTCO2 EIR suggestion because it was not on the your agenda. It is strictly a comment and no vote was taken.

Sincerely,

Matt Dunn (member of the CAC)
Principal Engineer

matt.dunn@aecom.com