



**DEPARTMENT OF THE AIR FORCE
UNITED STATES SPACE FORCE
SPACE LAUNCH DELTA 30**

24 April 2024

Beatrice L. Kephart
30 CES/CEI
1028 Iceland Avenue
Vandenberg SFB CA 93437-6010

Victoria Tang
Environmental Program Manager
California Department of Fish and Wildlife
South Coast Region
3883 Ruffin Road
San Diego CA 92123

Dear Ms. Tang,

We received your letter dated 8 February 2024 outlining comments and recommendations from your agency regarding the Environmental Assessment (EA) for Phantom Space Corporation Daytona-E and Laguna-E Launch Operations at Space Launch Complex 5 at Vandenberg Space Force Base. We appreciate your input and have addressed your concerns in the attached response matrix and have outlined any updates made to the EA. If you need additional information, or if you have questions, please do not hesitate to call me at (805) 605-7924 or email me at beatrice.kephart@spaceforce.mil. You can also direct your questions or comments to Tiffany Whitsitt-Odell at tiffany.whitsitt-odell@spaceforce.mil.

Sincerely,

BEATRICE L. KEPHART
Chief, Installation Management Flight

Attachment:

1. Responses to CDFW Comment Letter

Comment #	CDFW Comment	SLD 30 Response
1. Crotch's Bumble Bee	The California Department of Fish and Wildlife (CDFW) noted that the California Fish and Game Commission accepted a petition to list Crotch's bumble bee as endangered under the California Endangered Species Act (CESA) and advanced the species to the candidacy stage of the CESA-listing process. Pursuant to Fish and Game Code section 2085, CESA candidate species enjoy the same protections as CESA-listed threatened and endangered species in the State of California and CDFW requested that the USSF seek take authorization under CESA prior to implementing the Project.	While this federal project is not subject to the requirements of the California Endangered Species Act, SLD 30 acknowledges its responsibility, consistent with DAF policy, to provide similar conservation measures for species protected by state law when such protection is not in direct conflict with the military mission and will continue to do so. For this proposed action, various Environmental Protection Measures (EPMs) included in the Proposed Action (Section 2.3.3.2) will limit disturbance to the extent that is necessary to achieve the Project and will minimize impacts to native vegetation and wildlife.
2. CEQA Obligations	CDFW recommended that the EA be amended to include a discussion of other possible regulatory obligations of Phantom under the California Environmental Quality Act (CEQA) and that if additional analysis would not be pursued by a CEQA Lead Agency, CDFW recommended USSF and Phantom consult with CDFW for Project impacts to CESA-listed species.	This project's environmental impacts were reviewed in accordance with applicable federal laws, including the National Environmental Policy Act. This project is not subject to the requirements of CEQA. SLD 30 acknowledges its responsibility, consistent with DAF policy, to provide similar conservation measures for species protected by state law when such protection is not in direct conflict with the military mission and will continue to do so.
3. Weed Management	CDFW asserted that the EA did not discuss the potential effects of discharging that water throughout the year on wildlife or vegetation communities and that the document did not disclose the locations of the proposed infiltration basins/spray fields, nor indicate what vegetation communities occur at the discharge locations.	The infiltration basins/spray fields would be located in the "stormwater management areas" depicted in Figure 2.3.1 of the EA and the Stormwater Management Areas will be designed to prevent the presence of standing water, other than immediately after a rainstorm, by using design features similar to a French drain (EPMs, Table 2.3.12). These areas will be located within the SLC-5 fenceline where vegetation will be managed and maintained at low stature to reduce fire risk. Weed control will be an integral aspect of vegetation management at SLC-5. In addition, VSFB actively

		conducts numerous invasive species control programs across the Base annually, including a “Rapid Response” program to monitor for and eradicate any newly identified non-native, invasive species, which will include SLC-5 and the surrounding area.
4. Arguello Slender Salamander	CDFW recommended that similar analysis, impact avoidance measures, monitoring, and mitigation that was included for California red-legged frog be included in the EA for Arguello slender salamander. The CDFW recommended that the EA should include a monitoring and management program to track impacts to Arguello slender salamander resulting from the Project and that adaptive management strategies should be addressed in the monitoring and management program.	SLD 30 has developed a management plan for the Arguello slender salamander and is actively monitoring populations and implementing several conservation-focused management objectives for the species. We have no reason to expect launch-related impacts or mortality on the Arguello slender salamander. We acknowledge that both the currently known range and population size of this animal are small and we will eagerly cooperate with other landowners to conduct additional surveys for this fascinating and elusive species.
5. Environmental Data	CDFW requests that information developed in environmental assessments be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). Instructions for submittal are available online at https://wildlife.ca.gov/Data/CNDDDB . Additionally, information on special status native plant populations and sensitive natural communities should be submitted to CDFW’s Vegetation Classification and Mapping Program. Instructions for submittal are available online at https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit	SLD 30 will ensure that all special status species and natural communities data collected in support of EAs on VSFB and related biological studies will be reported in the CNDDDB and the Vegetation Classification and Mapping Program.