Appendix A

Notice of Preparation and Comments
NOTICE OF PREPARATION / NOTICE OF SCOPING MEETING
FOR A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE VETERANS INDUSTRIAL PARK 215
MARCH JOINT POWERS AUTHORITY, RIVERSIDE, CALIFORNIA

Date: August 24, 2016

To: State Clearinghouse
    State Responsible Agencies
    State Trustee Agencies
    Other Public Agencies
    Interested Organizations
    Interested Parties

From: Jeffrey Smith, AICP
    Senior Planner
    March Joint Powers Authority
    14205 Meridian Parkway, Suite 140
    Riverside, CA 92518

Subject: Notice of Preparation (NOP) / Notice of Scoping Meeting for a
draft environmental impact report (DEIR) for the Veterans Industrial Park 215

Lead Agency: March Joint Powers Authority

Project Title: Veterans Industrial Park 215

Project Area: March Joint Powers Authority

Notice is hereby given that the March Joint Powers Authority (MJPA) will be the lead agency and will prepare a Draft Environmental Impact Report (DEIR) for the Veterans Industrial Park 215 (Project). The DEIR will address the Project’s potential physical environmental effects on each of the environmental topics outlined in the California Environmental Quality Act (CEQA). The MJPA is requesting comments on the scope and content of this EIR.

A public scoping meeting will be held on Wednesday September 7, 2016, at 6:00 p.m. to 7:30 p.m., at the Western Municipal Water District, Training Room 120, located at 14205 Meridian Parkway, Riverside, CA. The scoping meeting is part of the EIR scoping process and the MJPA seeks input from the public and other agencies on specific topics they believe should be addressed in the environmental analysis. The focus of the scoping meeting will be the content to be studied in the EIR. Written comments on the scope of the EIR may also be sent to:

Jeffrey Smith, AICP
Senior Planner
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
Email: smith@marchjpa.com
Phone: 951.656-7000
Fax: 951 653-5558
Comments on the NOP are due no later than the close of the NOP review period, 5:00 pm, Friday, September 23, 2016. The MJPA, however, would appreciate your response at the earliest possible date. Please send your written comments to Jeffrey Smith, AICP, Senior Planner, at the address shown above or email smith@marcjpa.com, with “Veterans Industrial Park 215 - Project EIR” in the subject heading. Public agencies providing comments are asked to include a contact person for their agency.

PROJECT LOCATION AND EXISTING CONDITIONS: The Veterans Industrial Park 215 project site (referred to as VIP 215) is approximately 142.5 acres located within the boundaries of the March Inland Port Airport in unincorporated Riverside County, California. The project site is presently owned by the March Joint Powers Authority (MJPA) and would be developed under a ground lease. As depicted in Figure 1, the VIP 215 project site is located directly east of the Interstate 215 (I 215) Freeway off-ramp at Van Buren Boulevard, south of the existing March Field Air Museum, and west of an existing March Air Reserve Base airport runway. The I-215 Freeway off-ramp provides no access to the runway, any taxiways or other airport flying facilities. The Assessor Parcel Numbers (APNs) for the property are: 294-150-009, 294-170-005, 295-300-008, and 294-180-038. The VIP 215 project site is presently vacant and surrounded by the following uses:

North: Immediately to the north of the VIP 215 project site is the existing March Field Air Museum, zoned for Public Facilities uses.

East: The area east of the VIP 215 project site consists of the existing runways and facilities of the March Air Reserve Base.

South: Immediately south of the VIP 215 project site is the corporate boundary of the City of Perris, and the Perris Valley Commerce Center Specific Plan, zoned for Business Park and Light Industrial uses (City of Perris).

West: West of the project site is the I-215 Freeway, with the Riverside National Cemetery and the Meridian Business Park beyond.

PROJECT DESCRIPTION: The VIP 215 project site has a General Plan designation of Aviation and is not currently zoned. The project site is not served by aircraft taxiways and ramp facilities and is proposed for development with non-aviation land uses. The project proposes speculative industrial buildings that would allow for a mix of logistics center uses that could support wholesale, storage, distribution, manufacturing and/or assembly centers. The conceptual site plan, as shown on Figure 2, identifies two high cube industrial buildings which total approximately 2,219,852 square feet:

Building 1: 1,017,020 square feet

Building 2: 1,172,832 square feet

A logistics center can be defined as building space used for the intermediate storage and distribution of freight and commodities on route between their source and destination. Typical facilities have limited office areas. Each building would have a north to south orientation with trailer truck dock doors located on the rear of each building. All trailer truck parking would be provided on site. Both passenger vehicle and trailer truck parking would be provided in accordance with development code requirements.
The proposed buildings would be designed to comply with the height limitations imposed by the Federal Aviation Agency’s 7:1 conical surface of the airport, which begins at the eastern property line. Maximum building height on the eastern edge of the property closest to the runway (380 feet from the property line) would be 43 feet, rising to 45 feet at the top of the building’s ridgeline. The proposed buildings would incorporate higher elements for the western corners of the buildings (a maximum of 50 feet). Perimeter security fencing would be provided adjacent to the runway. All development within the VIP 215 project area will include all onsite and offsite infrastructure necessary for operation of facilities at the completion of development.

Currently, there is no improved access to the VIP 215 project site. Primary access to the project site would be provided through the construction of an extension of Van Buren Boulevard from its current terminus at the March Field Air Museum and to the project site’s southeastern border. The extension of Van Buren Boulevard, between its existing terminus and the project site, would be a divided Modified Secondary Highway.

Secondary access would be provided through the construction of a new road running south from the site’s southeastern border to Nandina Avenue, as an extension of existing Western Way. This Western Way extension would be an undivided Secondary Highway with a right-of-way of approximately 86 feet. This road would be an off-site infrastructure improvement encompassing approximately three acres.

Currently, there are no storm water facilities serving the VIP 215 project site. Storm water currently flows from west to east, beneath I-215 Freeway and across the site. The conceptual drainage plan assumes the construction of a subsurface storm drain to intercept drainage at the project site’s northern border near the existing terminus of Van Buren Boulevard. A second subsurface storm drain would be constructed to intercept drainage at the existing culvert under I-215 Freeway. These two storm drains would convey off-site regional flows through and around the project site to a proposed trapezoidal channel along the eastern boundary of the project site. This trapezoidal channel would convey regional flows without resulting in standing water to the existing channel near the southeastern edge of the project site.

The VIP 215 project site is not currently served by water, sewer, power, natural gas or telecommunications facilities. Services and infrastructure would be extended to the project site concurrent with the construction of facilities for the proposed project. Existing water and sewer lines are present in the vicinity and any extensions would be located in existing or planned public rights-of-way.

**PROJECT APPROvals:** The following entitlements and approvals would be required by the MJPA for the VIP 215 Project:

- Certification of the Final Environmental Impact Report
- Statutory Development Agreement (DA) and Disposition and Development Agreement (DDA)
- General Plan Amendment to add a Specific Plan (“SP”) Overlay
- Plot Plan
- Subdivision Map to create up to five parcels to accommodate the development plan
- Specific Plan: Veteran’s Industrial Park 215 Specific Plan
In addition, permits are anticipated for jurisdictional impacts to existing drainages, for encroachments in Caltrans Right-of-Way for drainage culverts, and for water quality.

RESPONSIBLE AGENCIES: The agencies listed below are potential responsible agencies who could use and is expected to review the Draft EIR to evaluate the proposed VIP 215 Project:

- California Department of Transportation
- California Department of Fish and Wildlife
- California Regional Water Quality Control Board
- United States Army Corp of Engineers
- Federal Aviation Administration
- City of Perris

INTRODUCTION TO ENVIRONMENTAL IMPACT REPORT (EIR): The purpose of an EIR is to inform decision-makers and the general public of the environmental effects of a proposed project. The EIR process is intended to provide environmental information for evaluating a proposed project and its potential to cause significant effects on the environment, examine methods of reducing adverse environmental impacts, and identify alternatives to a proposed project. The VIP 215 Project EIR will be a Project Level EIR. Section 15161 of the State of California Environmental Quality Act (CEQA) Guidelines describes the Project EIR as “the most common type of EIR examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project.” The Project EIR shall examine all phases of the project including planning, construction, and operation. The Project EIR for the VIP 215 Project shall be prepared and processed in accordance with CEQA and will include the following:

- Summary of the Project and its potential environmental effects
- Description of the Project
- Description of the existing environmental setting
- Potential environmental impacts of the Project
- Mitigation measures to reduce significant environmental effects of the Project
- Alternatives to the Project
- Cumulative impacts
- CEQA conclusions

PROBABLE ENVIRONMENTAL EFFECTS: An Initial Study has not been prepared for the proposed project, however, the VIP 215 DEIR will analyze whether the proposed project would have significant environmental impacts in the following areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hydrology / Water Quality
- Mineral Resources
- Population / Housing
- Agricultural or Forestry Resources
- Biological Resources
- Geology / Soils
- Hazards and Hazardous Materials
- Land Use / Planning
- Noise
- Public Services
To help prepare several of these sections and analyze the impacts, the following reports/technical studies will be prepared:

- Air Quality
- Cultural Resources Assessment
- Grading Plan
- Hazards and Hazardous Materials
- Water Quality Management Plan
- Phase 1 Environmental Site Assessment
- Traffic Study
- Biological Resources Assessment
- Geology and Soils Report
- Greenhouse Gas Analysis
- Hydrology Study
- Noise
- Public Services/Utilities

It is anticipated that the prepared documentation above will be sufficient to address the necessary CEQA topics to be covered.

**ALTERNATIVES:** Based on the conclusions determined in the DEIR, alternatives to the Project will be analyzed to reduce identified impacts. Section 15126.6(e) of the CEQA Guidelines requires the evaluation of a No-Project Alternative. Other alternatives may be considered during preparation of the DEIR and will comply with the CEQA Guidelines, which, “…must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”

**EIR PROCESS:** Following the close of the NOP comment period, a DEIR will be prepared that will analyze the environmental impacts, identify alternatives and consider all NOP comments.

As mentioned above, a public scoping meeting will be held on Wednesday September 7, 2016, at 6:00 p.m. to 7:30 p.m., at the Western Municipal Water District, Training Room 120, located at 14205 Meridian Parkway, Riverside, CA.

Comments on the NOP are due no later than the close of the NOP review period, 5:00 pm, Friday, September 23, 2016. Again, the MJPA would appreciate your response at the earliest possible date. Please send your written comments on the scope of the EIR and/or the NOP to Jeffrey Smith, AICP, Senior Planner, March Joint Powers Authority, 14205 Meridian Parkway, Suite 140, Riverside, CA 92518, or email smith@marchjpa.com, with “Veterans Industrial Park 215 - Project EIR” in the subject heading. Public agencies providing comments are asked to include a contact person for their agency.

August 24, 2016
Jeffrey Smith, AICP
Senior Planner
March Joint Powers Authority
Figure 1
Project Location Map

SOURCE: USGS - San Bernardino 7.5 min quad
Notice of Preparation

August 24, 2016

To: Reviewing Agencies

Re: Veterans Industrial Park 215 (VIP 215)
SCH# 2016081061

Attached for your review and comment is the Notice of Preparation (NOP) for the Veterans Industrial Park 215 (VIP 215) draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Jeffrey Smith
March Joint Powers Authority
14205 Meridian Parkway, Suite 140, Riverside, CA 92518
Riverside, CA 92518

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency
### SCH# 2016081061

**Project Title** Veterans Industrial Park 215 (VIP 215)  
**Lead Agency** March Joint Powers Authority  

**Type** NOP Notice of Preparation  
**Description** The proposed project is seeking a plot plan, general plan amendment, specific plan, parcel map and development agreement in support of the development of industrial buildings that would allow for a mix of (non-aviation) logistics center uses that could support wholesale, storage, distribution, manufacturing and/or assembly center uses. A total of 2,219,852 sf of building space is proposed in two buildings with parking, landscaping, drainage facilities and off-site improvements. The proposed project site encompasses 142.5 acres.

### Lead Agency Contact

<table>
<thead>
<tr>
<th>Name</th>
<th>Jeffrey Smith</th>
<th>Agency</th>
<th>March Joint Powers Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phone</td>
<td>951-656-7000</td>
<td>Fax</td>
<td></td>
</tr>
<tr>
<td>Address</td>
<td>14205 Meridian Parkway, Suite 140, Riverside, CA 92518</td>
<td>City</td>
<td>Riverside</td>
</tr>
<tr>
<td>Zip</td>
<td>CA 92518</td>
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### Project Location

<table>
<thead>
<tr>
<th>County</th>
<th>Riverside</th>
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<tbody>
<tr>
<td>Cty</td>
<td>Perris, Moreno Valley</td>
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<td>Region</td>
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<td>Cross Streets</td>
<td>I-215, off ramp at Van Buren Blvd</td>
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<tr>
<td>Lat / Long</td>
<td>33° 52' 40.7&quot; N / 117° 15' 44.4&quot; W</td>
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<td>Parcel No.</td>
<td>294-150-009, -170-005, 295-300-008, 294-180-038</td>
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<td>Township</td>
<td>3S Range 4W Section 25,26, Base 3SBM</td>
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### Proximity to:

- **Highways** I-215
- **Airports** March Air Reserve Base, March In
- **Railways** RCTC/BNSF
- **Waterways**
- **Schools** Serrano ES
- **Land Use** GPD: Aviation; Z: None

### Project Issues

- Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources;  
- Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals;  
- Noise; Population/Housing Balance; Public Services; Recreation/Parks; Sewer Capacity; Soil  
- Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water  
- Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects;  
- Other Issues

### Reviewing Agencies

- Resources Agency; Department of Parks and Recreation; Department of Water Resources;  
- Department of Fish and Wildlife, Region 6; Native American Heritage Commission; Public Utilities  
- Commission; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 8; Regional  
- Water Quality Control Board, Region 8

**Date Received** 08/24/2016  
**Start of Review** 08/24/2016  
**End of Review** 09/22/2016

Note: Blanks in data fields result from insufficient information provided by lead agency.
NOTICE OF COMPLETION & ENVIRONMENTAL DOCUMENT TRANSMITTAL

SCH No.: 2016081061

For U.S. Mail: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044
(916) 445-0613

For Hand Delivery and Overnight Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

<table>
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<th>PROJECT TITLE</th>
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<td>LEAD AGENCY</td>
<td>March Joint Powers Authority</td>
</tr>
<tr>
<td>CONTACT PERSON</td>
<td>Jeffrey M. Smith, AICP, Senior Planner</td>
</tr>
<tr>
<td>STREET ADDRESS</td>
<td>14205 Meridian Parkway, Suite 140, Riverside, CA 92518</td>
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<tr>
<td>ZIP CODE</td>
<td>92518</td>
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<td>COUNTY</td>
<td>Riverside</td>
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PROJECT LOCATION

| COUNTY          | Riverside County                   |
| CITY            | City of Moreno Valley, City of Perris|
| LAT. / LONG.    | 33° 52' 40.7"N / 117° 15' 44.4"W |

| CROSS STREETS   | Interstate 215 Freeway off-ramp at Van Buren Boulevard |
| ASSESSOR'S PARCEL NO. | 294-150-009, 294-170-005, 295-300-008 and 294-180-038 |
| CITY            | State of California                |
| ZIP CODE        | 92518                               |
| NEAREST COMMUNITY | City of Perris                   |
| SECTION         |                      |
| TOWNSHIP        | 35                                 |
| RANGE           | 4W                                 |
| BASE            | SBM                                |

| WITHIN 2 MILES: STATE HIGHWAY NO. | I-215 FWY |
| WITHIN 2 MILES: AIRPORTS          | March Air Reserve Base, March Inland Port Airport |
| WITHIN 2 MILES: RAILWAYS          | RCTC / BNSF |
| WITHIN 2 MILES: RAILWAYS          | Serrano Elementary School |
| WITHIN 2 MILES: WATERWAYS         | None |
| WITHIN 2 MILES: SCHOOLS           | None |

DOCUMENT TYPE

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<tr>
<th>CEQA</th>
<th>NEPA</th>
<th>OTHER</th>
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<tr>
<td>Supplement to EIR</td>
<td>NOI</td>
<td>Joint Document</td>
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<tr>
<td>Subsequent EIR</td>
<td>Draft EIS</td>
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LOCAL ACTION TYPE

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<th>Rezone</th>
<th>Annexation</th>
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<td>Master Plan</td>
<td>Prezone</td>
<td>Redevelopment</td>
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<td>Planned Unit Development</td>
<td>Use Permit</td>
<td>Coastal Permit</td>
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<td>Community Plan</td>
<td>Site Plan</td>
<td>Land Division (Subdivision, etc.)</td>
<td>Other: Master Plot Plan Development Agreement</td>
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DEVELOPMENT TYPE

| Residential: Units: Acres: | Water Facilities: Type: MGD: |
| Office: Sq. ft: Acres: Employees: | Transportation: Type: |
| Commercial: Sq. ft: Acres: Employees: | Mining: Mineral: |
| Industrial: Sq. ft: 2.2 Ml Acres: 142.5 Employees: | Power: Type: MW: |
| Educational:                  | Waste Treatment: Type: |
| Recreational:                 | Hazardous Waste: Type: |
| Other:                         |                        |
NOP Distribution List

Resources Agency
- Resources Agency
  - Nadell Gayou
- Dept. of Boating & Waterways
  - Denise Peterson
- California Coastal Commission
  - Elizabeth A. Fuchs
- Colorado River Board
  - Lisa Johansen
- Dept. of Conservation
  - Elizabeth Carpenter
- California Energy Commission
  - Eric Knight
- Cal Fire
  - Dan Foster
- Central Valley Flood Protection Board
  - James Herota
- Office of Historic Preservation
  - Ron Parsons
- Dept. of Parks & Recreation
  - Environmental Stewardship Section
- California Department of Resources, Recycling & Recovery
  - Sue O'Leary
  - Steve Goldbeck
- Dept. of Water Resources
  - Resources Agency
    - Nadell Gayou
  - Fish and Game
    - Scott Flint
      - Environmental Services Division
    - Fish & Wildlife Region 1
      - Curt Babcock

Other Departments
- Food & Agriculture
  - Sandra Schubert
    - Dept. of Food and Agriculture
- Dept. of General Services
  - Public School Construction
- Dept. of General Services
  - Cathy Buck/George Carollo
    - Environmental Services Section
- Delta Stewardship Council
  - Kewan Samsam
- Housing & Comm. Dev.
  - CEQA Coordinator
    - Housing Policy Division

Independent Commissions, Boards
- Delta Protection Commission
  - Erik Vink

County: "Riverdale"

- OES (Office of Emergency Services)
  - Monique Wilber
- Native American Heritage Comm.
  - Debbie Treadway
- Public Utilities Commission Supervisor
- Santa Monica Bay Restoration
  - Guangyu Wang
- State Lands Commission
  - Jennifer Deleong
- Tahoe Regional Planning Agency (TRPA)
  - Cherry Jacques

Cal State Transportation Agency CalSTA
- Caltrans - Division of Aeronautics
  - Philip Crimmins
- Caltrans - Planning
  - HQ LD-IGR
    - Terri Pencovic
- California Highway Patrol
  - Suzanna Ikeuchi
    - Office of Special Projects

Dept. of Transportation
- Caltrans, District 1
  - Rex Jackman
- Caltrans, District 2
  - Marcelino Gonzalez
- Caltrans, District 3
  - Eric Fedrick - South
    - Susan Zanchi - North
- Caltrans, District 4
  - Patricia Maurice
- Caltrans, District 5
  - Larry Newland
- Caltrans, District 6
  - Michael Navarro
- Caltrans, District 7
  - Dianna Watson

SCH# 2016081061

Regional Water Quality Control Board (RWQCB)
- RWQCB 1
  - Cathleen Hudson
    - North Coast Region (1)
- RWQCB 2
  - Environmental Document Coordinator
    - San Francisco Bay Region (2)
- RWQCB 3
  - Central Coast Region (3)
- RWQCB 4
  - Teresa Rodgers
    - Los Angeles Region (4)
- RWQCB 5
  - Central Valley Region (5)
- RWQCB 5F
  - Central Valley Region (5)
    - Fresno Branch Office
- RWQCB 5R
  - Central Valley Region (5)
    - Redding Branch Office
- RWQCB 6
  - Lahontan Region (6)
- RWQCB 6V
  - Lahontan Region (6)
    - Victorville Branch Office
- RWQCB 7
  - Colorado River Basin Region (7)
- RWQCB 8
  - Santa Ana Region (8)
- RWQCB 9
  - San Diego Region (9)

Other

Conservancy

Last Updated 7/19/2016
August 26, 2016

Jeffrey Smith
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92510

sent via e-mail:
smith@marchpa.com

RE: SCH# 2016081061; Veteran's Industrial Park 215 (VIP 215) Project, Notice of Preparation for Draft Environmental Impact Report, San Diego County, California

Dear Mr. Smith:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21064.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21064.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, “tribal cultural resources” (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015. If your project involves the adoption or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004 (SB 18). Both SB 18 and AB 52 have tribal consultation requirements. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (15 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends lead agencies consult with all California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC’s recommendations for conducting cultural resources assessments. Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52.

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d).
   d. A “California Native American tribe” is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. **Begin Consultation Within 30 Days of Receiving a Tribe’s Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subsd. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
   a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).

3. **Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).

4. **Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project’s impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).

5. **Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).

6. **Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency’s environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. **Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
   a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
   b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).

8. **Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).

9. **Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).

10. **Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
    a. Avoidance and preservation of the resources in place, including, but not limited to:
       i. Planning and construction to avoid the resources and protect the cultural and natural context.
II. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.

b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
   I. Protecting the cultural character and integrity of the resource.
   II. Protecting the traditional use of the resource.
   III. Protecting the confidentiality of the resource.

c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.

d. Protecting the resource. (Pub. Resources Code § 21084.3 (b)).

e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if those conservation easements are voluntarily conveyed. (Civ. Code § 815.3 (c)).

f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be reburied. (Pub. Resources Code § 5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
   a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
   b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
   c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

   This process should be documented in the Cultural Resources section of your environmental document.

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPA.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65362.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18’s provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code § 65362.3 (a)(2)).

2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.

3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65362.3 (b)).

4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
   a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
   b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/
NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
   a. If part or all of the APE has been previously surveyed for cultural resources.
   b. If any known cultural resources have been already been recorded on or adjacent to the APE.
   c. If the probability is low, moderate, or high that cultural resources are located in the APE.
   d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
   a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
   b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
   a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project’s APE.
   b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
   a. Lead agencies should include in their mitigation and monitoring reporting program planning provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
   b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
   c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

[Signature]

Gayle Totton, M.A., Ph.D.
Associate Governmental Program Analyst

cc: State Clearinghouse
September 1, 2016

March Joint Powers Authority
Jeffrey Smith, AICP
Senior Planner
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Notice of Preparation/Notice of Scoping Meeting for a Draft Environmental Impact Report (DEIR) for the Veterans Industrial Park 215 (Riv 215 PM R34.13)

Mr. Smith:

We have completed our initial review of the Notice of Preparation (NOP) for the Veterans Industrial Park 215. Project site proposes speculative industrial buildings that would allow for a mix of logistics center uses that could support wholesale, storage, distribution, manufacturing and or assembly. Site plans identifies two high cube industrial buildings which total approximately 2,219,852 square feet.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. Under the California Environmental Quality Act (CEQA), we are required to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the County of Riverside due to the Project’s potential impact to State facilities it is also subject to the policies and regulations that govern the SHS.

Our areas of concern, pertaining to State facilities, include hydrology/flooding and transportation/traffic issues in which the initial study identifies as having potentially significant impacts. Due to these potentially significant impacts and because the south portion of the Project area directly abuts Interstate 215 (I-215) we recommend the following to be analyzed in the preceding Draft Environmental Impact Report (DEIR):

Traffic Operations:

- To accurately evaluate the extent of potential impact to the operational characteristics of the existing highway, a traffic study should be prepared for review.
- A traffic impact study is necessary to determine this proposed project’s near-term and long-term impacts to the State facilities – existing and proposed – and to propose appropriate mitigation measures.

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
• The study should use as a guideline the *Caltrans Guide for the Preparation of Traffic Impact Studies*, which is located at the following website: http://www.dot.ca.gov/hq/traffops/developserv/operationalsystems/reports/tisguide.pdf Minimum contents of the traffic impact study are listed in Appendix “A” of the Traffic Impact Study (TIS) guide.

• All state facilities, including intersections, impacted by the Project, which include I-215, should be analyzed in the traffic study. Where applicable, such as signalized intersections and ramp interchanges, a synchro analysis, merge/diverge analysis, and a queuing analysis is recommended.

• The geographic area examined in the traffic study should include as a minimum all regionally significant arterial system segments and intersections, including State highway facilities where the project will add over 100 peak hour trips. State highway facilities that are experiencing noticeable delays should be analyzed in the scope of the traffic study for projects that add 50 to 100 peak hour trips.

• Mitigation measures to State facilities should be included in the traffic impact analysis. Mitigation identified in the traffic study, subsequent environmental documents, and mitigation monitoring reports, should be coordinated with Caltrans to identify and implement the appropriate mitigation, as well as the appropriate timing of the mitigation. Mitigation improvements should be compatible with Caltrans concepts.

• The lead agency should monitor impacts to insure that roadway segments and intersections remain at an acceptable Level of Service (LOS). Should the LOS reach unacceptable levels, the lead agency should delay the issuance of building permits for any project until the appropriate impact mitigation is implemented.

• The data used in the TIS should not be more than 2 years old.

• Caltrans endeavors that any direct and cumulative impacts to the State highway system be eliminated or reduced to a level of insignificance pursuant to the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) standards.

• Traffic Analysis Scenarios should clearly be exhibited as exiting, existing + project, existing + project + ambient growth, and existing + project + ambient growth + cumulative.

• Clearly indicate LOS with and without improvements.

• Proposed improvements should be exhibited in preliminary drawings that indicate the LOS with improvements.

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- Submit 2 hard copies of all Traffic Impact Analysis documents and 2 electronic Synchro Analysis files.

Additionally, we recommend the traffic study be submitted prior to the circulation of the DEIR to ensure timely review of the submitted materials and a preliminary scoping meeting to discuss any potential issues.

If future development is anticipated to impact State facilities drainage system please consider the following when development occurs:

**Hydrology and Grading**

- Verify capacity of existing drainage structures within State Right-of-Way (R/W) where connections between private and Caltrans systems are proposed.

- Provide mitigation measures that offset drainage impacts to existing State drainage facilities.

- Existing capacity of affected State drainage systems cannot be exceeded. Should 100-year project runoff volumes be determined to exceed the maximum capacity of the existing State drainage facilities, construction of on-site detention basins, new drainage systems or other impact mitigation will be required.

- All existing tributary areas, area drainage patterns and runoff volumes having an impact to adjacent I-215 drainage facilities must be identified and analyzed in a project hydrology study.

- Future review of project drainage design will include an evaluation of runoff impacts to adjacent State R/W. Where applicable, compliance with pertinent National Pollutant Discharge Elimination System (NPDES)/water quality standards will be required.

- Ensure that “best management practices” (BMP’s) used to treat site runoff entering State R/W are in compliance with all applicable National Pollution Discharge Elimination System (NPDES) or State Regional Water Resources Board regulations.

- Project grading and drainage impacts affecting State R/W should be identified and addressed prior to project approval.

- To ensure that proposed site grading and drainage design does not result in an adverse impact to State R/W, we ask that a requirement to review plans and provide written construction clearance be included among the project conditions of approval.

- Prior to issuance of construction permits, please forward copies of site grading and drainage plans when available so that we may determine the extent of project impact to the adjacent State R/W.

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• To ensure that State R/W impacts associated proposed grading, landscaping, and construction of parking structures and walls are identified, our review of rough and/or precise grading, landscape and building plans will be required.

When development does occur a need for encroachment permits will be necessary for any work performed within the State R/W. Furthermore, the applicant’s environmental documentation must include such work in their project description and indicate that an encroachment permit will be needed. As part of the encroachment permit process, the developer must provide appropriate environmental approval for potential environmental impacts to State Highway R/W.

Encroachment Permit Requirements

Issuance of a Caltrans Encroachment Permit will be required prior to any construction within State R/W. In addition, all work undertaken within I-215 Right-of-Way shall be in compliance to all current design standards, applicable policies, and construction practices. Detailed information regarding permit application and submittal requirements is available at:

Office of Encroachment Permits
California Department of Transportation
464 West Fourth Street, 6th Floor, MS 619
San Bernardino, CA 92401-1400
(909) 383-4526

Thank you for providing us this opportunity to review the NOP for the Veterans Industrial Park 215 DEIR and for your consideration of these and future comments. These recommendations are preliminary and summarize our review of materials provided for our evaluation. If this proposal is revised in any way, please forward appropriate information to this Office so that updated recommendations for impact mitigation may be provided. If you have questions concerning these comments, or would like to meet to discuss our concerns, please contact Talvin Dennis (909) 806-3957 or myself at (909) 383-4557.

Sincerely,

Richard A. Dennis

for

MARK ROBERTS
Office Chief
Intergovernmental Review, Community and Regional Planning

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California’s economy and livability"
MEMORANDUM FOR MARCH JOINT POWERS AUTHORITY
ATTN: JEFFREY SMITH, SENIOR PLANNER
14205 MERIDIAN PARKWAY, SUITE 140
RIVERSIDE, CA 92518

FROM: 452d Mission Support Group/Civil Engineers
Base Operating Support
610 Meyer Drive, Bldg. 2403
March ARB CA 92518-2166

SUBJECT: Veterans Industrial Park 215 (VIP 215), Project Draft Environmental Impact Report (EIR), The Assessor Parcel Numbers (APNs) are: 294-150-009, 294-170-005, 295-300-008, and 294-180-038

1. The March Air Reserve Base (MARB) review of the proposal to establish two warehouse facilities on 142.5 acres located directly southeast of the Interstate 215 Freeway off-ramp at Van Buren Boulevard, south of the March Field Air Museum, and west of March Air Reserve Base airport runway, is provided in this memorandum.

2. The parcel also known as Hillwood D2. This property is not located within any of the MARB Accident Potential Zones or Clear Zone for Runway 14-32. While the proposed use may be consistent with the Riverside County Airport Land Use Compatibility Plan (RLUC) zoning and land use guidelines, the proposed project presents a concern due to the location being directly along the west side of the MARB primary runway. Buildings in this area should not be used for high-density functions since the objective of the land use guidelines in and around APZ's is to restrict people-intensive uses due to a greater risk of aircraft incident in these areas. There are restrictions on land uses and heights of natural objects and man-made objects in the vicinity of air installations that may obstruct the airspace, attract birds, cause electromagnetic or thermal interference, or produce dust, steam, smoke, or light emissions to provide for safety of flight and the public welfare.

3. Due to the proximity of MARB, we request that any cameras are not facing or recording any actions or portion of the base/airfield operations and perimeter fencing of the facility be constructed of block walls to help eliminate lighting and security concerns.

4. The parcel is partially located within the Perris North sub-basin, the same groundwater sub-basin as MARB. The rising groundwater table at MARB is an ongoing concern and solutions are being sought by both MARB and the State of California. MARB has concerns with the rising groundwater and the ability to properly drain the water detention basins within 48 hours. Given the depth of current ground water we are concerned that proposed basins may fill with ground water, depending on the depth, and pumping ground water into storm water systems is not permitted. In the event that the basins no longer drain as originally designed, MARB is requesting the water detention basins be oversized to address future concerns or be placed underground or covered. Prior to issuance of formal approval, MARB requests to see specific designs of basins and if uncovered, calculations that show sufficient additional capacity if rock is added later.
5. A properly designed storm water management system and landscaping must address Bird Wildlife Aircraft Strike Hazard (BASH) concerns including proper detention infiltration of storm water runoff. In addition, we are keenly concerned with the proposed runoff intended to discharge through existing degraded natural channels on the base property. We request that this development be connected to a larger regional storm water effort to route storm water around MARB completely. Any new drainage (even at historical levels) onto the base further degrades our natural infrastructure, increases discharge periods and creates potential ponding on the airfield. Further, MARB is concerned with runoff from new development impacting our monitoring requirements and NPDES permit on the south of the base where the storm water exits. The base will want to review details of the storm water conveyance system and the landscaping plan when they become available. Given the proximity to the airfield, trees which will bear mast or grow to an adequate size for roosting should not be planted. Additional information on reducing BASH hazards can be found in AFPAM 91-212, Bird Wildlife Aircraft Strike Hazard (BASH) Management Techniques, dated February 1, 2004. We request that March Joint Powers Authority evaluate the storm water detention basin design to mitigate or eliminate any hazards, and jointly approve the design with MARB.

6. The site is located within an area that is exposed to elevated levels of noise from the base’s flying operations; reference the AUCZ for MARB for the noise contours for this area. A more recent model can be found within the Land Use Compatibility Plan (LUCP) adopted by the Riverside County Airport Land Use Commission (ALUC) dated November 13, 2014. The document titled, “Background Data: March Air Reserve Base Inland Port Airport Environ.,” is an insert to the LUCP. Referencing Exhibit MA-4 from the aforementioned insert, it would appear this project resides within an area that is subject to 75 dB Community Noise Equivalent Level (CNEL). In addition, this site is situated in an area where aircraft flying departures and arrivals from Runway 14R will overfly this area at relatively low altitudes. In addition, these aircraft will be at a high power setting generating significant noise contours. As such, employees of this proposed development would be subject to noise occurrences that may generate complaints to the base and the community leadership. Employees and regularly received public may require protection using noise abatement (noise level reduction) provided in the construction design. Additionally, hearing protection for employees may be required by Occupational Safety and Health Administration (OSHA) or other agencies as it relates to safety and health in a high noise work environment.

7. To help eliminate any potential adverse effects on aircraft operations at MARB, we ask that materials provided in construction be of a non-reflective material such as outside ductwork, windows and roofs by means such as painting or covering. In addition, none of the project improvements shall create:
   - Distracting lights which could be mistaken for airport lights
   - Sources of dust, steam, or smoke which may impair pilot visibility
   - Sources of electronic interference with aircraft communications or navigation

8. The following are some mitigating measures and it is our desire that all such steps be researched and implemented.
   - BMPs must be reviewed by the base and must not introduce hazards related to birdstrikes
   - Solar panels or any reflective materials on the rooftop are prohibited
   - No hazardous materials should be stored within this facility due to the proximity of the Airfield.
   - Noise level hazards must be mitigated

9. Thank you for the opportunity to review and comment on this proposed development. If you have questions please contact Ms. Denise Hauzer at (951) 633-1862.

   SHAP P. DUFFY
   Base Civil Engineer
MEMORANDUM FOR: March Joint Power Authority  
Attn: Mr. Jeffery M. Smith  
14205 Meridian Parkway, Suite 150  
Riverside, CA 92518  

FROM: AFCEC/CIBW  
3411 Olson Street  
McClellan, CA 95652-1003  


The purpose of this letter is to provide to March Joint Power Authority (MJPA) U.S. Air Force (USAF) comments/recommendations from the BRAC program perspective on the Notice of Preparation (NOP)/Notice of Scoping Meeting for Draft Environmental Impact Report (EIR) for the Veterans Industrial Park 215. The NOP was received by certified mail on 25 August 2016. See first attachment. The public Notice of Scoping Meeting was help on 7 September 2016 at MJPA office, which was attended by a USAF representative.  

The EIR is being prepared as part of the California Environemntal Quality Act (CEQA) to develop a 142.5 acres parcel (Parcel EE) located east of Interstate 215, south of the exiting March Field Air Museum, west of the active March Air Reserve Base runway (32/14), and north of the former base boundary. The proposed development is for two >1,000,000 square foot warehouses with surrounding employee and delivery semi-truck parking along with street improvements.  

The following comments/recommendations were shared by the USAF representative at the end of the Scoping Meeting for the Draft EIR. As requested during that Scoping Meeting and in the NOP, the USAF comments in writing are:  

- The USAF has a multi-level (WestBay Inc.) groundwater well (RBEMW05) located within this development parcel. The developer needs to work around this 354-foot deep well, since this well is very expensive to properly decommission and replace. The civil coordinates for this well is 2257675.03 (Northing coordinate) and 6264033.41 (Easting coordinate) at an elevation 1,521.27 feet above mean sea level. This well’s design is the second attachment.  

- Under “Responsible Agencies” section of the NOP, the USAF should be one of the federal agencies in consideration for review of the Draft EIR, since the USAF is the former property owner with legal interest in the property.
Under "Introduction to Environmental Impact Report (EIR)" section of the NOP, the potential environmental impacts as per CEQA guidelines should not be limited to the evaluation of potential petroleum hydrocarbons impacts to the parcel, since the former base is a Superfund site. Munitions should be included.

Thank you for your support of the former March Air Force Base environmental program. If you have any questions or concerns, please do not hesitate to call me at (210) 395-9456.

ATTACHMENTS:


2. RBEMW5 Monitoring Well Construction Diagram from the Draft, Regional Basin Evaluation, March Air Reserve Base, Volume 2 dated February 2001

cc:
AFCEC/ CZRW, Attn: Mr. David Leeson (email notification)
AFCEC/CIBW, Attn: Mr. Eric Lehto (email notification)
AECOM, Attn: Mr. Jagadish Gundarlahalli (email notification)
BAH, Attn: Mr. Vergel Casunaran (email notification)
Attachment 1
NOTICE OF PREPARATION / NOTICE OF SCOPING MEETING
FOR A DRAFT ENVIRONMENTAL IMPACT REPORT
FOR THE VETERANS INDUSTRIAL PARK 215
MARCH JOINT POWERS AUTHORITY, RIVERSIDE, CALIFORNIA

Date: August 24, 2016

To: State Clearinghouse
State Responsible Agencies
State Trustee Agencies
Other Public Agencies
Interested Organizations
Interested Parties

From: Jeffrey Smith, AICP
Senior Planner
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Subject: Notice of Preparation (NOP) / Notice of Scoping Meeting for a
Draft Environmental Impact Report (DEIR) for the Veterans Industrial Park 215

Lead Agency: March Joint Powers Authority

Project Title: Veterans Industrial Park 215

Project Area: March Joint Powers Authority

Notice is hereby given that the March Joint Powers Authority (MJPA) will be the lead agency and will prepare a Draft Environmental Impact Report (DEIR) for the Veterans Industrial Park 215 (Project). The DEIR will address the Project's potential physical environmental effects on each of the environmental topics outlined in the California Environmental Quality Act (CEQA). The MJPA is requesting comments on the scope and content of this EIR.

A public scoping meeting will be held on Wednesday September 7, 2016, at 6:00 p.m. to 7:30 p.m., at the Western Municipal Water District, Training Room 120, located at 14205 Meridian Parkway, Riverside, CA. The scoping meeting is part of the EIR scoping process and the MJPA seeks input from the public and other agencies on specific topics they believe should be addressed in the environmental analysis. The focus of the scoping meeting will be the content to be studied in the EIR. Written comments on the scope of the EIR may also be sent to:

Jeffrey Smith, AICP
Senior Planner
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
Email: smith@marchipa.com
Phone: 951.656-7000
Fax: 951.653-5558
Comments on the NOP are due no later than the close of the NOP review period, 5:00 pm, Friday, September 23, 2016. The MJPA, however, would appreciate your response at the earliest possible date. Please send your written comments to Jeffrey Smith, AICP, Senior Planner, at the address shown above or email smith@marcijpa.com, with "Veterans Industrial Park 215 - Project EIR" in the subject heading. Public agencies providing comments are asked to include a contact person for their agency.

PROJECT LOCATION AND EXISTING CONDITIONS: The Veterans Industrial Park 215 project site (referred to as VIP 215) is approximately 142.5 acres located within the boundaries of the March Inland Port Airport in unincorporated Riverside County, California. The project site is presently owned by the March Joint Powers Authority (MJPA) and would be developed under a ground lease. As depicted in Figure 1, the VIP 215 project site is located directly east of the Interstate 215 (I 215) Freeway off-ramp at Van Buren Boulevard, south of the existing March Field Air Museum, and west of an existing March Air Reserve Base airport runway. The I-215 Freeway off-ramp provides no access to the runway, any taxiways or other airport flying facilities. The Assessor Parcel Numbers (APNs) for the property are: 294-150-009, 294-170-005, 295-300-008, and 294-180-038. The VIP 215 project site is presently vacant and surrounded by the following uses:

North: Immediately to the north of the VIP 215 project site is the existing March Field Air Museum, zoned for Public Facilities uses.

East: The area east of the VIP 215 project site consists of the existing runways and facilities of the March Air Reserve Base.

South: Immediately south of the VIP 215 project site is the corporate boundary of the City of Perris, and the Perris Valley Commerce Center Specific Plan, zoned for Business Park and Light Industrial uses (City of Perris).

West: West of the project site is the I-215 Freeway, with the Riverside National Cemetery and the Meridian Business Park beyond.

PROJECT DESCRIPTION: The VIP 215 project site has a General Plan designation of Aviation and is not currently zoned. The project site is not served by aircraft taxiways and ramp facilities and is proposed for development with non-aviation land uses. The project proposes speculative industrial buildings that would allow for a mix of logistics center uses that could support wholesale, storage, distribution, manufacturing and/or assembly centers. The conceptual site plan, as shown on Figure 2, identifies two high cube industrial buildings which total approximately 2,219,852 square feet:

Building 1: 1,017,020 square feet
Building 2: 1,172,832 square feet

A logistics center can be defined as building space used for the intermediate storage and distribution of freight and commodities on route between their source and destination. Typical facilities have limited office areas. Each building would have a north to south orientation with trailer truck dock doors located on the rear of each building. All trailer truck parking would be provided on site. Both passenger vehicle and trailer truck parking would be provided in accordance with development code requirements.
The proposed buildings would be designed to comply with the height limitations imposed by the Federal Aviation Agency’s 7:1 conical surface of the airport, which begins at the eastern property line. Maximum building height on the eastern edge of the property closest to the runway (380 feet from the property line) would be 43 feet, rising to 45 feet at the top of the building’s ridgeline. The proposed buildings would incorporate higher elements for the western corners of the buildings (a maximum of 50 feet). Perimeter security fencing would be provided adjacent to the runway. All development within the VIP 215 project area will include all onsite and offsite infrastructure necessary for operation of facilities at the completion of development.

Currently, there is no improved access to the VIP 215 project site. Primary access to the project site would be provided through the construction of an extension of Van Buren Boulevard from its current terminus at the March Field Air Museum and to the project site’s southeastern border. The extension of Van Buren Boulevard, between its existing terminus and the project site, would be a divided Modified Secondary Highway.

Secondary access would be provided through the construction of a new road running south from the site’s southeastern border to Nandina Avenue, as an extension of existing Western Way. This Western Way extension would be an undivided Secondary Highway with a right-of-way of approximately 86 feet. This road would be an off-site infrastructure improvement encompassing approximately three acres.

Currently, there are no storm water facilities serving the VIP 215 project site. Storm water currently flows from west to east, beneath I-215 Freeway and across the site. The conceptual drainage plan assumes the construction of a subsurface storm drain to intercept drainage at the project site’s northern border near the existing terminus of Van Buren Boulevard. A second subsurface storm drain would be constructed to intercept drainage at the existing culvert under I-215 Freeway. These two storm drains would convey off-site regional flows through and around the project site to a proposed trapezoidal channel along the eastern boundary of the project site. This trapezoidal channel would convey regional flows without resulting in standing water to the existing channel near the southeastern edge of the project site.

The VIP 215 project site is not currently served by water, sewer, power, natural gas or telecommunications facilities. Services and infrastructure would be extended to the project site concurrent with the construction of facilities for the proposed project. Existing water and sewer lines are present in the vicinity and any extensions would be located in existing or planned public rights-of-way.

**PROJECT APPROVALS:** The following entitlements and approvals would be required by the MJPA for the VIP 215 Project:

- Certification of the Final Environmental Impact Report
- Statutory Development Agreement (DA) and Disposition and Development Agreement (DDA)
- General Plan Amendment to add a Specific Plan ("SP") Overlay
- Plot Plan
- Subdivision Map to create up to five parcels to accommodate the development plan
- Specific Plan: Veteran’s Industrial Park 215 Specific Plan
The proposed buildings would be designed to comply with the height limitations imposed by the Federal Aviation Agency’s 7:1 conical surface of the airport, which begins at the eastern property line. Maximum building height on the eastern edge of the property closest to the runway (380 feet from the property line) would be 43 feet, rising to 45 feet at the top of the building’s ridgeline. The proposed buildings would incorporate higher elements for the western corners of the buildings (a maximum of 50 feet). Perimeter security fencing would be provided adjacent to the runway. All development within the VIP 215 project area will include all onsite and offsite infrastructure necessary for operation of facilities at the completion of development.

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- Specific Plan: Veteran’s Industrial Park 215 Specific Plan
In addition, permits are anticipated for jurisdictional impacts to existing drainages, for encroachments in Caltrans Right-of-Way for drainage culverts, and for water quality.

RESPONSIBLE AGENCIES: The agencies listed below are potential responsible agencies who could use and is expected to review the Draft EIR to evaluate the proposed VIP 215 Project:

- California Department of Transportation
- California Department of Fish and Wildlife
- California Regional Water Quality Control Board
- United States Army Corp of Engineers
- Federal Aviation Administration
- City of Perris

INTRODUCTION TO ENVIRONMENTAL IMPACT REPORT (EIR): The purpose of an EIR is to inform decision-makers and the general public of the environmental effects of a proposed project. The EIR process is intended to provide environmental information for evaluating a proposed project and its potential to cause significant effects on the environment, examine methods of reducing adverse environmental impacts, and identify alternatives to a proposed project. The VIP 215 Project EIR will be a Project Level EIR. Section 15161 of the State of California Environmental Quality Act (CEQA) Guidelines describes the Project EIR as “the most common type of EIR examines the environmental impacts of a specific development project. This type of EIR should focus primarily on the changes in the environment that would result from the development project.” The Project EIR shall examine all phases of the project including planning, construction, and operation. The Project EIR for the VIP 215 Project shall be prepared and processed in accordance with CEQA and will include the following:

- Summary of the Project and its potential environmental effects
- Description of the Project
- Description of the existing environmental setting
- Potential environmental impacts of the Project
- Mitigation measures to reduce significant environmental effects of the Project
- Alternatives to the Project
- Cumulative impacts
- CEQA conclusions

PROBABLE ENVIRONMENTAL EFFECTS: An Initial Study has not been prepared for the proposed project, however, the VIP 215 DEIR will analyze whether the proposed project would have significant environmental impacts in the following areas:

- Aesthetics
- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Hydrology / Water Quality
- Mineral Resources
- Population / Housing
- Agricultural or Forestry Resources
- Biological Resources
- Geology / Soils
- Hazards and Hazardous Materials
- Land Use / Planning
- Noise
- Public Services

Notice of Preparation | Veterans Industrial Park 215 | 4
• Recreation
• Transportation and Traffic

• Utilities / Service Systems

To help prepare several of these sections and analyze the impacts, the following reports/technical studies will be prepared:

• Air Quality
• Cultural Resources Assessment
• Grading Plan
• Hazards and Hazardous Materials
• Water Quality Management Plan
• Phase 1 Environmental Site Assessment
• Traffic Study

• Biological Resources Assessment
• Geology and Soils Report
• Greenhouse Gas Analysis
• Hydrology Study
• Noise
• Public Services/Utilities

It is anticipated that the prepared documentation above will be sufficient to address the necessary CEQA topics to be covered.

ALTERNATIVES: Based on the conclusions determined in the DEIR, alternatives to the Project will be analyzed to reduce identified impacts. Section 15126.6(e) of the CEQA Guidelines requires the evaluation of a No-Project Alternative. Other alternatives may be considered during preparation of the DEIR and will comply with the CEQA Guidelines, which, “...must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.”

EIR PROCESS: Following the close of the NOP comment period, a DEIR will be prepared that will analyze the environmental impacts, identify alternatives and consider all NOP comments.

As mentioned above, a public scoping meeting will be held on Wednesday September 7, 2016, at 6:00 p.m. to 7:30 p.m., at the Western Municipal Water District, Training Room 120, located at 14205 Meridian Parkway, Riverside, CA.

Comments on the NOP are due no later than the close of the NOP review period, 5:00 pm, Friday, September 23, 2016. Again, the MUPA would appreciate your response at the earliest possible date. Please send your written comments on the scope of the EIR and/or the NOP to Jeffrey Smith, AICP, Senior Planner, March Joint Powers Authority, 14205 Meridian Parkway, Suite 140, Riverside, CA 92518, or email smith@marchipa.com, with "Veterans Industrial Park 215 - Project EIR" in the subject heading. Public agencies providing comments are asked to include a contact person for their agency.

August 24, 2016
Jeffrey Smith, AICP
Senior Planner
March Joint Powers Authority
Figure 1
Project Location Map
Attachment 2
Notes:

- All measurements are from below the ground surface in feet.
- Stainless steel centralizers placed above and below the screen and mild steel centralizers are spaced along blank casing approximately every 40 feet.
- 0.010 in. (10 slot) Type 304 (SCH. 40) stainless steel extra strength wire wrapped screen.
- 20 ft. Above and 10 ft. below each screen is stainless steel blank casing (20 ft. Bottom sump is stainless steel). All other blank casing is Schedule 40 mild steel.
- #216 sand filter pack
- 1:1 granular bentonite and 4x12 sand ("Benseal").

Total Depth of Well Borehole 356'

LEGEND

- Concrete Apron
- Neat Grout
- Benseal
- Sand Filter Pack
- Screen with Endcap

United States Air Force
March AFB
RREMWS Monitoring Well
Construction Diagram
Figure A1-26
September 23, 2016

Mr. Jeffrey Smith, AICP, Senior Planner  
March Joint Powers Authority  
14205 Meridian Parkway, Suite 140  
Riverside, California 92518  
Phone: (915) 656-7000  
E-mail: smith@marchjpa.com


Dear Mr. Smith,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Veterans Industrial Park 215 ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. Guidance provided by these reviews is intended to assist local agencies such as local jurisdictions and project proponents to take actions that help contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Veterans Industrial Park 215 in unincorporated Riverside County. The proposed project includes the construction and operation of two high cube industrial buildings, totaling approximately 2,219,852 square feet on approximately 142.5 acres. The project is currently not served by water, sewer, power, natural gas or telecommunications facilities therefore services and infrastructure would be extended to the project site.

When available, please send environmental documentation to SCAG's office in Los Angeles or by email to sunl@scag.ca.gov providing, at a minimum, the full public comment period for review. If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Lijing Sun, Senior Regional Planner, at (213) 236-1882 or sunl@scag.ca.gov. Thank you.

Sincerely,

Ping Chang  
Acting Manager, Compliance and Performance Monitoring

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1 Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.
COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
VETERANS INDUSTRIAL PARK 215 [SCAG NO. IGR8980]

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project’s consistency with the RTP/SCS.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

<table>
<thead>
<tr>
<th>SCAG 2016 RTP/SCS GOALS</th>
</tr>
</thead>
<tbody>
<tr>
<td>RTP/SCS G1: Align the plan investments and policies with improving regional economic development and competitiveness</td>
</tr>
<tr>
<td>RTP/SCS G2: Maximize mobility and accessibility for all people and goods in the region</td>
</tr>
<tr>
<td>RTP/SCS G3: Ensure travel safety and reliability for all people and goods in the region</td>
</tr>
<tr>
<td>RTP/SCS G4: Preserve and ensure a sustainable regional transportation system</td>
</tr>
<tr>
<td>RTP/SCS G5: Maximize the productivity of our transportation system</td>
</tr>
<tr>
<td>RTP/SCS G6: Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</td>
</tr>
<tr>
<td>RTP/SCS G7: Actively encourage and create incentives for energy efficiency, where possible</td>
</tr>
<tr>
<td>RTP/SCS G8: Encourage land use and growth patterns that facilitate transit and active transportation</td>
</tr>
<tr>
<td>RTP/SCS G9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</td>
</tr>
</tbody>
</table>

*SCAG does not yet have an agreed-upon security performance measure.

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:
2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendices of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit http://scagrupcs.net/Pages/FINAL2016RTPSCS.aspx. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf. The growth forecasts for the region and applicable jurisdictions are below.

<table>
<thead>
<tr>
<th>Adopted SCAG Region Wide Forecasts</th>
<th>Adopted Unincorporated Riverside County Forecasts</th>
</tr>
</thead>
<tbody>
<tr>
<td>Population</td>
<td></td>
</tr>
<tr>
<td>Year 2020</td>
<td>Year 2020</td>
</tr>
<tr>
<td>19,663,000</td>
<td>385,600</td>
</tr>
<tr>
<td>Year 2035</td>
<td>Year 2035</td>
</tr>
<tr>
<td>22,091,000</td>
<td>471,200</td>
</tr>
<tr>
<td>Year 2040</td>
<td>Year 2040</td>
</tr>
<tr>
<td>22,138,800</td>
<td>499,200</td>
</tr>
<tr>
<td>Household</td>
<td></td>
</tr>
<tr>
<td>Year 2020</td>
<td>Year 2020</td>
</tr>
<tr>
<td>6,458,000</td>
<td>121,800</td>
</tr>
<tr>
<td>Year 2035</td>
<td>Year 2035</td>
</tr>
<tr>
<td>7,325,000</td>
<td>153,200</td>
</tr>
<tr>
<td>Year 2040</td>
<td>Year 2040</td>
</tr>
<tr>
<td>7,412,300</td>
<td>162,900</td>
</tr>
<tr>
<td>Employment</td>
<td></td>
</tr>
<tr>
<td>Year 2020</td>
<td>Year 2020</td>
</tr>
<tr>
<td>8,414,000</td>
<td>96,700</td>
</tr>
<tr>
<td>Year 2035</td>
<td>Year 2035</td>
</tr>
<tr>
<td>9,441,000</td>
<td>139,700</td>
</tr>
<tr>
<td>Year 2040</td>
<td>Year 2040</td>
</tr>
<tr>
<td>9,871,500</td>
<td>156,600</td>
</tr>
</tbody>
</table>

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: http://scagrupcs.net/Pages/FINAL2016PEIR.aspx). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project-and site-specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.
August 31, 2016

Notice of Preparation of a CEQA Document for the
Veterans Industrial Park 215 Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff’s comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft EIR. Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. In addition, please send with the Draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

Air Quality Analysis
The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD’s Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD’s website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a Draft EIR document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board’s Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: http://www.arb.ca.gov/ch/handbook.pdf. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Finally, should the proposed project include equipment that generates or controls air contaminants, a permit may be required and the SCAQMD should be listed as a responsible agency and consulted. The assumptions in the submitted Draft EIR would also be the basis for permit conditions and limits. Permit questions can be directed to the SCAQMD Permit Services staff at (909) 396-3385, who can provide further assistance.

Project Specific Comments – High Cube Warehouse Projects
SCAQMD recommends the use of truck trip rates from the Institute of Transportation Engineers (ITE) for high cube warehouse projects located in SCAQMD (i.e. 1.68 average daily vehicle trips per 1,000 s.f. and 0.64 average daily truck trips per 1,000 s.f.). Consistent with CEQA Guidelines, the Draft EIR may use a non-default trip rate if there is substantial evidence indicating another rate is more appropriate for the air quality analysis.

For high cube warehouse projects, the SCAQMD staff has been working on a Warehouse Truck Trip Study to better quantify trip rates associated with local warehouse and distribution projects, as truck emission represent more than 90 percent of air quality impacts from these projects. Details regarding this study can be found online here: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/high-cube-warehouse

Mitigation Measures
In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Mitigation Measure resources are available on the SCAQMD CEQA Air Quality Handbook website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook

Data Sources
SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s webpage (http://www.aqmd.gov).

The SCAQMD staff is available to work with the lead agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact Gordon Mize, Air Quality Specialist by e-mail at gmize@aqmd.gov or by phone at (909) 396-3302.

Sincerely,

Jillian Wong
Jillian Wong, Ph.D.
Planning and Rules Manager
Planning, Rule Development & Area Sources

JW:GM

RVC160825-08
Control Number
August 31, 2016

Mr. Jeffrey Smith, Project Planner
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside CA 92518

RE: AIRPORT LAND USE COMMISSION (ALUC) DEVELOPMENT REVIEW REQUIRED

Jurisdiction Project Case: Notice of Preparation for a Draft EIR Veterans Industrial Park

Dear Mr. Smith,

Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a copy of the transmittal for the March Joint Powers Authority Notice of Preparation/Scoping Meeting for Draft EIR for the Veterans Industrial Park; a proposal to develop two high cube industrial buildings totaling approximately 2,219,852 square feet located on 142.5 acres.

ALUC staff has determined that the project is located within Compatibility Zone B2 of the March Air Reserve Base/Inland Port Airport Compatibility Plan which restricts nonresidential intensity to 100 people per average acre and 250 people per single acre, and also prohibits children's schools, day care centers, libraries, hospitals, congregate care facilities, hotels, places of assembly, buildings with three aboveground floors, noise-sensitive outdoor uses, critical community infrastructure facilities, and hazards to flight.

California Public Utilities Code section 21676 requires the local agency to refer any amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within an Airport Land Use Compatibility Plan (ALUCP) to the ALUC. Additionally, California Public Utilities Code Section 21676.5 allows the ALUC to review all projects within the Airport Influence Area when the local jurisdiction's General Plan is not consistent with the applicable ALUCP. Since the General Plan is not consistent with the ALUCP and/or because the project contemplates amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation, the ALUC requests that you submit the above-identified project(s) for its review. ALUC staff is also available to assist in bringing your jurisdiction’s General Plan into consistency with the applicable ALUCP, if the local jurisdiction so desires.

If you have any questions, please contact Paul Rull, ALUC Urban Regional Planner IV, at (951) 955-8893 or John Guerin, ALUC Principal Planner, at (951) 955-0982.

Sincerely,

RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Paul Rull, ALUC Urban Regional Planner IV
September 6, 2016

March Joint Powers Authority  
Attn: Jeffrey Smith  
14205 Meridian Parkway Suite 140  
Riverside CA 92518

SUBJECT: DRAFT ENVIRONMENTAL IMPACT REPORT; VETERAN INDUSTRIAL PARK (VIP) 215 – INITIAL COMMENTS

Dear Mr. Smith:

Based on the information provided, the Department of Environmental Health (DEH) offers the following initial comments:

WATER AND WASTEWATER:
Provide an original copy of a water and sewer “will-serve” letter from Western Municipal Water District (WMWD) along with a map of the nearest water and sewer main line connection.

ENVIRONMENTAL CLEANUPS PROGRAM
The applicant shall obtain written clearance from DEH Environmental Cleanup Programs. Please note that an Environmental Site Assessment, Phase I study may be required at their discretion. For further information, please contact Yvonne Reyes at (951) 955-8982.

INDUSTRIAL HYGIENE - NOISE
The applicant shall obtain written clearance from DEH Office of Industrial Hygiene. Please note that a noise study may be required at their discretion. For further information, please contact Steve Hinde at (951) 955-8982.

Should you have any questions regarding this letter, please contact me at (951) 955-8980.

Sincerely,

Kristine Kim, REHS  
County of Riverside, Department of Environmental Health  
Environmental Protection and Oversight Division  
3880 North Lemon Street, Suite 200  
Riverside, CA 92501
September 14, 2016

Jeffrey Smith, Senior Planner
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518


Dear Mr. Smith:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP for a Draft EIR for the project referenced above. The proposed project is located directly southeast of the Interstate 215 (I-215) Freeway off-ramp at Van Buren Boulevard, south of the existing March Field Air Museum, and west of an existing March Air Reserve Base airport runway within the existing March Joint Powers Authority (JPA) Planning Area. The following comments should be addressed in the forthcoming DEIR:

1. Construction of the proposed Project may substantially increase the quantity of construction and demolition (C&D) waste generated by the project. Should a large quantity of the C&D waste be brought to a County landfill for disposal, it could exceed the landfill’s daily permitted capacity, thus a violation of state regulations. The DEIR should quantitatively analyze this potential solid waste impact and discuss feasible mitigation programs.

2. Build-out of the Project may have the potential to generate a substantial amount of waste that might adversely affect solid waste facilities. To assess waste impacts, the DEIR will need to include the projected maximum amount of waste generated at built-out of the Project, using appropriate waste generation factors for the proposed land uses. (Note: Consult the CalRecycle website to determine waste generation factors at:

www.calrecycle.ca.gov/wastechar/wastegenrates)

a) Solid waste generated within the project area is collected by Waste Management Inc. (WMI), with the bulk of waste delivered to the Badlands Landfill. The Badlands Landfill is located at 31125 Ironwood Avenue, in Moreno Valley. The Badlands Landfill is permitted for 4,500 tpd operation.

b) While the majority of waste if disposed of at the Badlands Landfill, the transfer station operator would use the Lamb Canyon Landfill for disposal of residual waste. The following information can be useful in the analysis of solid waste impacts:
Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal and another 128 acres are designated for existing and planned ancillary facilities and activities. The landfill is currently permitted to receive 4,500 tons per day for disposal and had an estimated total capacity of approximately 20.4 million tons. As of June 30, 2016 (beginning of day), the landfill had a total remaining disposal capacity of approximately 8.1 million tons. The Badlands Landfill is projected to reach capacity, at the earliest time, in 2022. From July 2015 to June 2016, the Badlands Landfill accepted a daily average volume of 2,486 tons and a period total of approximately 765,723 tons. Further landfill expansion potential exists at the Badlands Landfill site.

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 580.5 acres encompass the current landfill permit area. Of the 580.5-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tons of refuse per day and had an estimated total disposal capacity of approximately 20.7 million tons. As of June 30, 2016 (beginning of day), the landfill had a total remaining capacity of approximately 10.7 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2029. From July 2015 to June 2016, the Lamb Canyon Landfill accepted a daily average volume of 1,718 tons and a period total of approximately 529,375 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

3. The project proponent is also encouraged to consider incorporating the following measures to help reduce the anticipated project's solid waste impacts and enhance efforts to comply with the State's mandate of 50% solid waste diversion from landfilling.

- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.

- Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.

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1 GASB_18_2016 – Engineering Estimate for total landfill capacity
2 GASB_18_2016 & SiteInfo
3 SWFP #33-AA-0006
4 GASB_18_2016 – Engineering Estimate for total landfill capacity
5 GASB 18_2016 & SiteInfo
6 SWFP #33-AA-0007
Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.

5. AB 341 focuses on increased commercial waste recycling as a method to reduce greenhouse gas (GHG) emissions. The regulation requires businesses and organizations that generate four or more cubic yards of waste per week and multifamily units of 5 or more, to recycle. A business shall take at least one of the following actions in order to reuse, recycle, compost, or otherwise divert commercial solid waste from disposal:

- Source separate recyclable and/or compostable material from solid waste and donate or self-haul the material to recycling facilities.
- Subscribe to a recycling service with their waste hauler.
- Provide recycling service to their tenants (if commercial or multi-family complex).
- Demonstrate compliance with the requirements of California Code of Regulations Title 14.

For more information, please visit:
www.rivcown.org/opencms/recycling/recycling_and_compost_business.html#mandatory

6. AB 1826 (effective April 1, 2016) requires businesses that generate 8 cubic yards or more of organic waste per week to arrange for organic waste recycling services. The threshold amount of organic waste generated requiring compliance by businesses is reduced in subsequent years. Businesses subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:

- Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.

- Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.

Thank you for the opportunity to review and comment on the Notice of Preparation. We would appreciate a copy of the Draft EIR on CD for review and comment when available. I can be reached at (951) 486-3200 if you have any questions regarding the above comments.

Sincerely,

Jose Merlan
Urban/Regional Planner II

PD#198443
Dear Mr. Smith,

This email is written in response to the Notice of Completion (NOP)/ Notice of Scoping Meeting for a Draft Environmental Impact Report for the Veteran Industrial Park 215 project. March Joint Powers Authority (JPA) is proposing the construction of industrial buildings that would allow for a mix of logistics center uses that could support wholesale, storage, distribution, manufacturing and or assembly centers. The conceptual site plan identifies two high cube industrial buildings totaling more than 2.2 million square feet. The Riverside County Flood Control and Water Conservation District’s (District) has reviewed the EIR and has the following comment:

An encroachment permit will be required from the District for any work that occurs within our rights-of-way, easements or facilities will be affected. If an encroachment permit is required, the applicant is required to demonstrate consistency with the applicable sections of the Western Riverside County Multiple Species Habitat Conservation Plan for all work that involves the District rights-of-way, easements or facilities. To obtain further information on encroachment permits or existing facilities, contact Amy McNeill of the Encroachment Permit Section at 951.955.1266.

Please also note that the proposed project is located within the Perris Valley Master Drainage Plan (MDP). When fully implemented, these MDP facilities will provide flood protection to relieve those areas within the plan of the most serious flooding problems and will provide adequate drainage outlets. The DEIR should address impacts to MDP facilities within the proposed project area. The MDP maps can be viewed online at www.rcflood.org. To obtain further information on the MDP and the proposed facilities, please contact Edwin Quinonez of the District’s Planning Section at 951.955.1345.

Thank you for the opportunity to review the NOP. For our record keeping purposes, we request that you acknowledge receipt of this email. If you have any questions concerning this email, I may be contacted at 951.955.1526. You may also contact Kris Flanigan at 951.955.8581.

Kevin Cunningham
Associate Flood Control Planner

Environmental Regulatory Services 2
Riverside County Flood Control
& Water Conservation District

Office: 951.955.1526
Fax: 951.788.9965
RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

September 14, 2016

March Joint Powers Authority
23555 Meyer Drive
Riverside, CA 92318

Attention: Jaffrey Smith

Ladies and Gentlemen:

Re: Veterans Industrial Park 215

The District does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check city land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District has not reviewed the proposed project in detail and the following checked comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety or any other such issue:

1. This project proposes channels, storm drains 36 inches or larger in diameter or other facilities that could be considered regional in nature and/or a logical extension of the adopted Perris Valley, Line B1 Master Drainage Plan. The District would consider accepting ownership of such facilities on written request of the City. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection and administrative fees will be required.

2. This project is located within the limits of the District's Perris Valley Area Drainage Plan for which drainage fees have been adopted; applicable fees should be paid by cashier's check or money order only to the Flood Control District or City prior to issuance of grading permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped floodplain, then the City should require the applicant to provide all studies, calculations, plans and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation or other final approval of the project, and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped floodplain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Game and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

HENRY OLIVOS
Engineering Project Manager

c: Riverside County Planning Department
   Attn: Kristi Lovelady
   SKM:blm
September 19, 2016

Jeffrey Smith, AICP
Senior Planner
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Notice of Preparation of a Draft Environmental Impact Report for the Veterans Industrial Park 215

Dear Mr. Smith,

Thank you for sending the Riverside County Transportation Department (County) the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Veterans Industrial Park 215.

The project is generally located directly southeast of the Interstate 215/Van Buren Boulevard interchange, south of the existing March Field Air Museum, and west of the existing March Air Reserve Base airport runway. The project proposes two industrial buildings approximately a total of 2,219,852 square feet that would allow for a mix of logistic center uses that could support wholesale, storage, distribution, manufacturing and/or assembly centers.

The County requests to review the project’s traffic study. The traffic study for the proposed development should address potential impacts and mitigation measures on any Riverside County roadways in the area included in the Riverside County General Plan. In addition, where the proposed project would add 50 or more peak hourly trips to County intersections shall be analyzed. Necessary improvements to mitigate project impacts shall be identified, and responsibility for the needed improvements shall be designated. The County requests that its Traffic Study Guidelines be followed for the impact analysis for facilities within Riverside County.

The most current version of the Traffic Study Guidelines can be found on the County website: http://rctlma.org/trans/General-Information/Pamphlets-Brochures.
Jeffrey Smith, AICP
September 19, 2016
Page 2

Thank you again for the opportunity to review the NOP. We look forward to receiving the DEIR and the traffic analysis for the development. Please contact me at (951) 955-2016 with questions or comments.

Sincerely,

Russell Williams
Development Review Manager

RUW:KKT:TT:rg

cc: Juan C. Perez, Director of Transportation and Land Management
    Patricia Romo, Director of Transportation
    Mojahed Salama, Deputy Director of Transportation
September 22, 2016

Mr. Jefferey Smith, AICP
March Joint Powers Authority
14205 Meridian Pkwy, Suite 140
Riverside, CA 92518

RE: Notice of Preparation/ Notice of Scoping Meeting of a Draft Environmental Impact Report

Dear Mr. Smith,

In response to your request of the existing fire protection for the above referenced project area, the Riverside County Fire Strategic Planning Division would like to note the following:

The existing County Station 6, located on 22250 Eucalyptus Avenue, Moreno Valley, will respond with one city Type 1 Fire Engine providing paramedic service. The distance from the station to the proposed development is approximately six miles. This station is staffed 24 hours a day, 7 days a week, with a 3 person crew, providing Paramedic Service.

The proposed project will have a cumulative adverse impact on the Fire Department’s ability to provide an acceptable level of service. These impacts include an increased number of emergency and public service calls due to the increased presence of structures, traffic and population. The project proponents/developers will be expected to provide for a proportional mitigation to these impacts via capital improvements and/or impact fees.

Fire Department emergency vehicle apparatus access road locations and design shall be in accordance with the California Fire Code, Riverside County Ordinance 460, Riverside County Ordinance 787, and Riverside County Fire Department Standards. Plans must be submitted to the Fire Department for review and approval prior to building permit issuance. Secondary means of access to collector roads seem to be inadequate based on the current conditions.

Prior to Building Permit issuance, the required water system, including all fire hydrant(s), shall be installed and accepted by the appropriate water agency and the Riverside County Fire Department prior to any combustible building materials placed on an individual lot. Contact the Riverside County Fire Department to inspect the required fire flow, street signs, and the required all weather surface access roadways. Approved water plans must be at the job site.

If I can be of further assistance, please feel free to contact me at (951) 293-1993 or email at dexter.galang@fire.ca.gov.

Sincerely,

Dexter Galang
Facilities Planner
Strategic Planning
August 29, 2016

[VIA EMAIL TO: smith@marchpja.com]
March Joint Powers Authority (JPA)
Jeffrey Smith
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

Re: Notice of Preparation / Notice of Scoping Meeting for a Draft Environmental Impact Report for the Veterans Industrial Park 215

Dear Jeffrey Smith,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Veterans Industrial Park 215 project. The project area is not located within the boundaries of the ACBCI Reservation. However, it is within the Tribe’s Traditional Use Area (TUA). A records check of the ACBCI registry indicates this area has not been surveyed for cultural resources. For this reason, the ACBCI THPO requests the following:

*A copy of the records search with associated survey reports and site records from the information center.

*A cultural resources inventory of the project area by a qualified archaeologist prior to any development activities in this area.

*Copies of any cultural resource documentation (report and site records) generated in connection with this project.

*The presence of an approved Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior’s Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760)699-6828. You may also email me at hfeeney@aguacaliente.net.

Cordially,
Hannah Feeney
Archaeological and Archives Technician
Tribal Historic Preservation Office
AGUA CALIENTE BAND
OF CAHUILLA INDIANS
September 22, 2016

Jeffery Smith, AICP  
March Joint Powers Authority  
14205 Meridian Parkway, Suite 140  
Riverside, CA 92518

Subject: Comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Proposed Veterans Industrial Park Project

Dear Mr. Smith:

The City of Moreno Valley appreciates the opportunity to comment on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the proposed Veterans Industrial Park Project. The proposed project site lies within the March Joint Powers Authority (MJPA) boundaries and covers roughly 142.5 acres within the March Inland Port located in unincorporated Riverside County. The land use designation of the project site is shown as “Aviation” in the MJPA General Plan and is not currently zoned. The project size and proximity to Moreno Valley gives us keen interest in the project to ensure it is successful without adverse impacts to Moreno Valley.

The project includes two (2) industrial buildings totaling 2,219,852 square feet. The project currently calls for speculative buildings allowing for wholesale, storage, distribution and manufacturing uses. The City requests that should actual tenants be identified for the project, that the information be shared and factored into the project analysis as appropriate.

With its high visibility along Interstate 215, the project should be developed/maintained in a high quality fashion.

In reviewing the Notice of Preparation of a DEIR and related Initial Study, we offer the following comments for your consideration:
Planning Division Comments

- The NOP is insufficient as it does not highlight or evaluate potential environmental impacts that may be associated with the project. California Environmental Quality Act Guidelines Section 15082 “Notice of Preparation and Determination of Scope of an EIR” states that “probable environmental effects of the project shall be provided”. On Page 4 of the NOP, all potential categories contained within a DEIR, including aesthetics, agricultural, air quality, biological resources, cultural resources, geology/soils, greenhouse gas emissions, hazards, hydrology/water quality, land use/planning, mineral resources, noise, population/housing, public services, recreation, transportation and traffic, and utilities were listed in the transmittal but not evaluated to any degree in the NOP. The document states that, “an Initial Study has not been prepared for the proposed project; however the DEIR will analyze whether the proposed project would have significant environmental impacts”. A completed initial study is requested to evaluate impacts and narrow the potential impact list down to those impacts that would be considered as a significant impact. An initial study is warranted to detail that a DEIR is the correct environmental document for the proposed project.

- The project is located in Zone B2. This is considered a High Noise Zone within the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. The DEIR should confirm structures will be located at the maximum distance from a runway, sound attenuation will be required to meet interior noise level criteria, fire sprinklers will be required, airspace review will be performed for structures that are more than 35 feet tall, and avigation easement dedication and disclosure is performed.

- The project DEIR will need to clearly state the discretionary actions required for review the proposed project. It appears at minimum that the project would require a plot plan, tentative subdivision map and change of zone.

- The project is designated as “Aviation” in the MJPA General Plan and does not contain a specific land use zone. The document shall clearly note the zone or land use that is allowing the opportunity for over 2 million square feet of industrial warehouse buildings to be built at the site. It does not appear that the proposed use would be compatible with other land uses included in the general vicinity and could produce unmitigated impacts to traffic and air quality.

- As the project is included on or adjacent to the March Air Reserve Base runway and operations, the DEIR for the proposed industrial warehouse use (potential for over 2 million square feet) must demonstrate the project is compatible with and will not conflict with ongoing current and future Base operations.
• It is important that the project is designed to be compatible with surrounding land uses in the general vicinity. In order to properly evaluate this interest, a conceptual site plan and conceptual elevation plans that convey the intended architectural quality of the project must be submitted as part of the DEIR document.

• Cumulative impacts must be considered.

• Transportation impacts need to be reviewed in the DEIR. The project may affect circulation elements of interest to the City, including Alessandro Boulevard, Cactus Avenue, and their interchanges with I-215. A traffic study shall be prepared that analyzes project access and traffic operations regionally, Interstate 215 and any nearby intersections/off-ramps. Information shall include the number of trucks/vehicles generated by the project. The City of Moreno Valley requests an opportunity to review the draft traffic study when complete.

• The DEIR shall disclose and discuss any planned circulation system improvements and the timing of such improvements in relation to the timing of the project.

• The DEIR should include discussions on the new Moreno Valley/March Field Metrolink Station located westerly of Interstate 215 and any connections to the project.

Land Development Division Comments

• The project area is included in the Riverside County Flood Control District’s Perris Valley Area Drainage Plan. The project appears to drain to the southeast into laterals that are connected to Line B. The project hydrology and hydraulics study should ensure adequate storm drain capacity to handle any changes in flows.

The City of Moreno Valley looks forward to working with the March Joint Powers Authority as this project progresses. We respectfully request that the City of Moreno Valley receive copies of the DEIR and associated technical studies when available. Please include the City on any future mailing lists regarding the DEIR documents as well as for future notification of meetings and public hearings associated with the project.
Thank you again for the opportunity to provide comments on the NOP. Should you have any questions or concerns, please contact Mark Gross, AICP at (951) 413-3215.

Sincerely,

Richard J. Sandzimir
Planning Official

c
City Council
City Manager
Assistant City Manager
City Attorney
Department Heads
Adria Reinerston, Fire Marshall
Eric Lewis, City Traffic Engineer
Michael Lloyd, Land Development Division Manager
Mark Gross, Senior Planner
Claudia Manrique, Associate Planner
Via Email and U.S. Mail

August 30, 2016

Jeffrey Smith, AICP, Senior Planner
March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
smith@marchjpa.com

Casey Allen, Clerk
March Joint Powers Authority Commission
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
allen@marchjpa.com

Re: Veterans Industrial Park 215, SCH2016081061

Dear Mr. Smith:

I am writing on behalf of the Laborers International Union of North America, Local Union 1184 and its members living in the County of Riverside ("LIUNA"), regarding the Veterans Industrial Park 215, aka VIP 215 and SCH2016081061, including all actions related or referring to the proposed industrial development of a total of 2,219,852 sf of building space on 142.5 acres located on Parcel nos. 294-150-009, 294-170-005, 295-300-008, and 294-180-038. ("Project").

We are commenting on the Notice of Preparation (NOP) of an environmental impact report (EIR). We request that the agency fully comply with CEQA and analyze all significant impacts and propose all feasible mitigation measures and environmentally superior alternatives.

We hereby request that March Joint Powers Authority ("Agency") send by electronic mail or U.S. mail to our firm at the address below notice of any and all actions or hearings related to activities undertaken, authorized, approved, permitted, licensed, or certified by the Agency and any of its subdivisions, and/or supported, in whole or in part, through contracts, grants, subsidies, loans or other forms of assistance from the Agency, including, but not limited to the following:

- Notice of any public hearing in connection with the Project as required by California Planning and Zoning Law pursuant to Government Code Section 65091.

- Any and all notices prepared for the Project pursuant to the California Environmental Quality Act ("CEQA"), including, but not limited to:
August 30, 2016
Re. Veterans Industrial Park 215 Project
Page 2 of 2

- Notices of any public hearing held pursuant to CEQA.
- Notices of determination that an Environmental Impact Report ("EIR") is required for a project, prepared pursuant to Public Resources Code Section 21060.4.
- Notices of any scoping meeting held pursuant to Public Resources Code Section 21083.9.
- Notices of preparation of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21092.
- Notices of availability of an EIR or a negative declaration for a project, prepared pursuant to Public Resources Code Section 21152 and Section 15087 of Title 14 of the California Code of Regulations.
- Notices of approval and/or determination to carry out a project, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of approval or certification of any EIR or negative declaration, prepared pursuant to Public Resources Code Section 21152 or any other provision of law.
- Notices of determination that a project is exempt from CEQA, prepared pursuant to Public Resources Code section 21152 or any other provision of law.
- Notice of any Final EIR prepared pursuant to CEQA.

Please note that we are requesting notices of CEQA actions and notices of any public hearings to be held under any provision of Title 7 of the California Government Code governing California Planning and Zoning Law. **This request is filed pursuant to Public Resources Code Sections 21092.2 and 21167(f), and Government Code Section 65092**, which requires agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

Please send notice by electronic mail or U.S. mail to:

Richard Drury
Theresa Rettinghouse
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, CA 94607
510 836-4200
richard@lozeaudrury.com, theresa@lozeaudrury.com

Please call should you have any questions. Thank you for your attention to this matter.

Sincerely,

[Signature]

Theresa Rettinghouse
Paralegal
Lozeau | Drury LLP
Good morning Jeff,

Per the VIP 215 NOP, Lamar Advertising is officially stating our project concern. Recently, Lamar Advertising installed a large billboard adjacent to the proposed VIP 215 southwest corner project borders. Lamar Advertising's primary concern regarding the VIP 215 project are any proposed vegetation and/or signage fronting the 215 and new Van Buren extension that may possibly obstruct visibility of our existing signs north face.

That said, Lamar Advertising is requesting a 1000 foot sign visibility corridor be formally implemented as a VIP 215 condition of approval. Such condition of approval may state, as an example: Starting from the south west corner of the property extending northward 1000 feet and 70 feet wide, starting at Caltrans' easterly right of way border that no vegetation, signage, or miscellaneous infrastructure equipment within this designated area not exceed 20 feet in overall height.

Lamar Advertising is hopeful our request will be given serious consideration moving forward. We look forward to mutually working with you regarding this issue.

Sincerely,
Nat

Nat Preston
Project Manager
Lamar Advertising
24541 Redlands Blvd.
Loma Linda, CA 92354
(909) 799-1010 office