Initial Study

West Campus Upper Plateau Project

NOVEMBER 2021

Prepared for:

MARCH JPA

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AFB	Air Force Base
AICUZ	Air Installations Compatible Use Zones
ALUCP	Airport Land Use Compatibility Plan
ARB	Air Reserve Base
CBD	Center for Biological Diversity
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
HARM	Hazard Assessment Rating Methodology
HFHSZ	High Fire Hazard Severity Zone
1	Interstate
JPA	Joint Powers Authority
MSHCP	Multiple Species Habitat Conservation Plan
NAHC	Native American Heritage Commission
NOP	Notice of Preparation
RCFD	Riverside County Fire Department
SWPPP	Stormwater Pollution Prevention Program
SWRCB	State Water Resources Control Board
VMT	vehicle miles traveled
WMWD	Western Municipal Water District

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1 Introduction

This Initial Study addresses the West Campus Upper Plateau Project (Project), which includes the proposed buildout of a Development Area consisting of Business Park, Mixed Use, Industrial, Park, and Open Space parcels. The proposed Project also includes the placement of a Conservation Area under a conservation easement in compliance with the CBD Settlement Agreement (March JPA 2012). Further details regarding the Development Area and Conservation Area are provided in Section 1.3.2, Project Components.

1.1 Project Background

In 1993, the federal government, through the Defense Base Closure and Realignment Commission, mandated the realignment of March Air Force Base (AFB) and a substantial reduction in its military use. In April 1996, March AFB was redesignated as an Air Reserve Base (ARB). The decision to realign March AFB resulted in approximately 4,400 acres of property and facilities being declared surplus and available for disposal actions. To oversee the dispensation and management of the surplus land, the Cities of Moreno Valley, Perris, and Riverside and the County of Riverside formed the March Joint Powers Authority (March JPA) in 1993, which continues to serve as the reuse authority of March ARB.

In March 1997, March JPA assumed land use control for all surplus property identified and began preparation of a General Plan for the planning area. In 1999, March JPA approved the March JPA General Plan and Master Environmental Impact Report (EIR; State Clearinghouse No. 97071095) for the March JPA planning area, which includes March ARB. The General Plan now serves as the land use and development guidance document for development within the March JPA planning area.

The Project site has been analyzed under both the California Environmental Quality Act (CEQA) and the National Environmental Policy Act in the following documents:

- March AFB Master Reuse Plan, March JPA (November 1995)
- Final Environmental Impact Statement: Disposal of Portions of March AFB (February 1996)
- Final Environmental Impact Report for the March AFB Redevelopment Project (June 1996)
- Redevelopment Plan for the March AFB Redevelopment Project (July 1996)
- March JPA Development Code (July 1997)
- General Plan of the March JPA (September 1999)
- Master EIR for the General Plan of the March JPA (September 1999)
- March Air Reserve Base (ARB)/Inland Port Airport Land Use Plan (2014)
- Final Air Installations Compatible Use Zone Study, March ARB (2018)

The Project site (refer to Section 1.3, Project Overview) is designated as Business Park (BP) and Park/Recreation/Open Space (P/R/OS) under the General Plan Land Use Map. Meridian Park West, LLC, is now pursuing development of the site.

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Consistent with all other Specific Plans in the March JPA planning area, Mixed Use includes a variety of land uses, including commercial, business park, and industrial uses, but does not include the development of residential units.

On September 12, 2012, a Settlement Agreement was entered between and among the Center for Biological Diversity (CBD), the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC as the complete settlement of the claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et al.* (CBD Settlement Agreement; March JPA 2012). The CBD Settlement Agreement contemplated the division of western acreage under the jurisdiction of the March JPA, including the Project site, into a Conservation Area, Developable Area, Proposed Park Area, and Water Quality/Open Space Area.

The analysis in this Initial Study addresses the following two components of the proposed Project: the proposed buildout of the Development Area and the placement of the Conservation Area under a conservation easement in compliance with the CBD Settlement Agreement.

1.2 Project Objectives

The proposed Project requests a General Plan Amendment, Specific Plan, Zoning Amendment, Tentative Tract Map, three Plot Plans, and a Development Agreement to redevelop the former munitions bunkers of the March AFB. The primary objectives of the Project include the following:

- Provide appropriate land use intensities to comply with the parameters of the March ARB/Inland Port Airport Compatibility Plan.
- Provide increased job opportunities for local residents through the provision of employmentgenerating businesses.
- Establish a land use and facility plan that ensures Project viability in consideration of existing and anticipated economic conditions.
- Provide park and open space amenities to serve the region.
- Complete the buildout of the roadway infrastructure by connecting Cactus Avenue to Barton Street, extending Barton Street from Alessandro Boulevard to Barton Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.
- Remove a majority of the former munitions storage area of the March AFB.
- Provide appropriate land use intensities to comply with the parameters of the March AFB Master Reuse Plan.
- Implement the goals, objectives, and policies of the March JPA General Plan.
- Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable.
- Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in Center for Biological Diversity v. Jim Bartel, et al.

1.3 Project Overview

1.3.1 Project Location

The proposed Project site includes a Development Area and a Conservation Area, as described in greater detail in Section 1.3.2, Project Components. The Project site comprises approximately 808 acres within the March JPA planning area, located approximately half a mile west of Interstate (I) 215. Of the approximately 808-acre area, 360

acres would be for the Development Area, 3 acres would be for an existing public facility, and 445 acres would be for the Conservation Area. More specifically, the Project site is in the western portion of the March JPA planning area, west of Cactus Avenue's current terminus, to the east and south of the Mission Grove neighborhood, and to the north of the Orangecrest neighborhood in unincorporated Riverside County, California (Figure 1, Project Location). The Development Area will include the extensions of Cactus Avenue, Brown Street, and Barton Street. The latitude and longitude of the approximate center of the Project site is 33.906375" north and -117.305077" west. The Project site is in Township 3 South, Range 4 West, including Sections 15, 16, 17, 20, 21, 22 within the Riverside East 7.5-minute quadrangle, as mapped by the U.S. Geological Survey. The Development Area is located within the following 13 Assessor's Parcel Numbers: 276-120-001, 276-170-007, 294-020-001, 297-080-003, 297-080-004, 297-090-001, 297-090-002/-003/-004/-007/-008/-009, and 297-100-093. The Conservation Area is located within the following 19 Assessor's Parcel Numbers: 276-120-001, 276-170-007, 294-020-001/-002, 294-040-031/-038, 297-080-002/-003/-004/-005, 297-090-002/-003/-004/-005/-006/-007/-008/-009, and 297-110-036.

Existing development within the Project site consists of a water tower, an existing public facility, paved and dirt access roads, and 16 bunkers that were previously used for munitions storage by the Air Force prior to March AFB's realignment in 1993. All of the bunkers are currently used by Pyro Spectaculars for the storage of fireworks. While the Development Area encompasses existing development and previously disturbed land, the Conservation Area primarily consists of open space and undeveloped land.

The Project site is surrounded by residential uses to the north, west, and south; the Meridian West industrial project, located within the March JPA planning area, to the east; and two new industrial buildings built by Exeter, located in Riverside County, to the east and north. The residential uses to the north and west are part of the Mission Grove neighborhood in the City of Riverside. The residential uses to the south are part of the Orangecrest neighborhood in the City of Riverside. The closest schools to the Project site, Benjamin Franklin Elementary School and Amelia Earhart Middle School, are located south of the Project site in the Orangecrest neighborhood. The Benjamin Franklin Elementary School is located approximately 0.8 miles south of the Project site and the Amelia Earhart Middle School is located approximately 1 mile south of the Project site.

The parcels immediately to the east of the Project site are designated as Business Park (BP) and Industrial (IND). The parcels immediately to the north, west, and south of the Project site are not part of the March JPA planning area. The nearest residential area is located approximately 300 feet north of the Development Area, which is described in greater detail in Section 1.3.2.

As shown on Figure 2, March JPA Existing and Proposed General Plan Land Use Designations, the Conservation Area's land use designation is currently Business Park (BP). The Project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown on Figure 3, March JPA Zoning Designations.

1.3.2 Project Components

1.3.2.1 Development Area

Proposed Development

Buildout of the Development Area includes the redevelopment of the former March AFB munitions bunkers. The proposed Development Area buildout would include the construction of a ring of seven Business Park parcels, three Mixed Use parcels, one Industrial parcel, and two Public Facilities parcels surrounding two Industrial parcels, an

open space area with two small adjacent parking lots, two smaller open space areas, and a small park for recreational users. The four Business Park parcels to the north would be a total of 34.50 acres, the Business Park parcel to the east would be 9.38 acres, and the two Business Park parcels to the south would total 22.47 acres. Similar to all other Specific Plans in the March JPA planning area, the three Mixed Use parcels would include a variety of land uses but would not include the development of residential units. The three Mixed Use parcels would be 10.77 acres, 26.60 acres, and 5.45 acres and would be located along the west side, just east of the Barton Street extension, and along the southeast corner of the Development Area. The three Industrial parcels, which would be located in the project center and eastern project area, would be 58.21 acres, 59.55 acres, and 27.58 acres. The two Public Facility parcels would consist of a 2.12-acre Western Municipal Water District (WMWD) sewer lift station to be developed along the east side of the Development Area just south of Cactus Avenue and a 1.41-acre utility facility to be developed southeast of the WMWD facility.

The three open space areas would consist of a larger open space area and two smaller open space areas. The larger open space area would be 50.00 acres and would consist of trails for recreational users. The larger open space area would be located directly east of the Barton Street extension and just south of the park area. Two small parking areas would be located on the eastern edge of the larger open space area to provide access for park users. The first smaller open space area would be approximately 11.98 acres and would be located directly north of the four Business Park parcels. The second smaller open space area would be 2.48 acres and would be located south of Bunker Hill Drive, between one of the Mixed Use parcels and the two Business Park parcels, as well as along the southern perimeter of the proposed Development Area from Barton Street to Cactus Avenue. The open space parcels would provide a further buffer for the Conservation Area.

The small recreation park area would be approximately 10.00 acres and would be located west of Barton Street and directly north of the larger open space area. The small recreation park area would include park amenities such as a playground, picnic area, and exercise stations.

Buildout of the Development Area would also include the extension of Cactus Avenue from its existing western terminus to intersect with Barton Street, which will be extended from Alessandro Boulevard to the north to connect to Barton Drive to the south. Regarding the existing roadway network within the munitions storage area, buildout of the Development Area would also include the construction of Arclight Drive, Airman Drive, Bunker Hill Drive, and Linebacker Drive (Figure 4, Project Site Plan).

Site Access and Circulation

The Development Area would be accessed through the extension of existing streets that have been planned in the March JPA General Plan. Access to the Development Area from the east would be achieved via Cactus Avenue, which would be extended to the west from its current western terminus through the Development Area to connect to Barton Street. The Development Area would also be accessed from the north and south by extending Barton Street to connect from Alessandro Boulevard to Barton Drive. Access to the Development Area from the north would be via Brown Street, which would be extended to the south to connect from Alessandro Boulevard to the new extension of Cactus Avenue. Truck routes are proposed along Cactus Avenue to I-215, as well as along Linebacker Drive, Arclight Drive, Airman Drive, and Bunker Hill Drive (Figure 5, Proposed Truck Routes). Truck routes would be prohibited along the Barton Street extension through the development of a roundabout at the Cactus Avenue and Airman Drive intersection that would include signs deterring trucks from accessing Barton Street from Cactus Avenue.

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Utilities

On-site trenching would occur to interconnect with existing water, wastewater, storm drain, natural gas, and electrical facilities that are currently stubbed out at the western terminus of Cactus Avenue. The proposed development would extend these utilities along Cactus Avenue to the Development Area (Figure 4). In addition, buildout of the Development Area would include relocating several existing on-site utilities, including a 30-inch gas line that traverses the Project site.

Water service (domestic and fire) and sewer service would be provided by WMWD. Sewer service for the proposed park areas may be provided by the City of Riverside.

Landscaping

Buildout of the proposed Development Area would include perimeter landscaping consisting of a minimum 30-foot-wide landscape buffer along the northern, western, and southern Development Area boundaries maintained by a Landscape Lighting and Maintenance District. In addition, the improved park area, perimeter slopes, and street parkways will be maintained by the Landscape Lighting and Maintenance District. All landscape planting will be drought tolerant and irrigated by recycled water.

Site Preparation, Grading, Construction, and Paving

Buildout of the Development Area would be divided into two phases, Phase 1 and Phase 2, as described in further detail below. The construction schedule utilized in the analysis, shown in Tables 1 and 2, represents a "worst-case" analysis scenario should construction occur any time after the respective dates, given that emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity, as shown in Tables 1 and 2, represents a reasonable approximation of the expected construction fleet as required per CEQA. The duration of construction activity is based on the Project's 2026 opening year.

Phase 1. This phase would include all rough grading, including removal of the bunkers, and infrastructure for the entire Development Area. The Development Area contains numerous bunkers that were used for the storage of munitions for decades. During site preparation and grading in this phase, all but two of the existing bunkers would be removed. The remaining bunkers, located southeast of the development, would be preserved for potential historical preservation or ongoing reuse. Phase 1 construction is expected to last 13 months, commencing in December 2022 and ending in January 2024, as shown in Table 1.

Table 1. Construction Schedule - Phase 1

Phase Name	Start Date	End Date
Site preparation	12/01/2022	02/28/2023
Grading	03/01/2023	01/31/2024

Phase 2. This phase would include site preparation, building construction, paving, and architectural coating. Phase 2 would begin when Phase 1 is complete and is expected to last 22 months, commencing in March 2024 and ending in January 2026, as shown in Table 2.

Table 2. Construction Schedule - Phase 2

Phase Name	Start Date	End Date
Site preparation	03/30/2024	06/30/2024
Building construction	02/01/2025	03/30/2026
Paving	12/20/2025	02/15/2026
Architectural coating	11/02/2025	01/15/2026

1.3.2.2 Conservation Area

Under the CBD Settlement Agreement, March JPA is required to place approximately 649 acres into conservation via easement to be managed for its wildlife habitat value for sensitive species. Refer to Figure 6, Settlement Agreement – Area for Potential Development, for the entire conservation boundaries. In 2014, March JPA placed the southern 141.237 acres under a conservation easement currently managed by the Rivers and Lands Conservancy. The Project proposes to place the remaining approximately 445.05 acres of undisturbed land surrounding the Development Area,² referred to as the Conservation Area, under a conservation easement, consistent with prior determinations made as part of the CBD Settlement Agreement. An additional 87.7 acres of open space is available for the dedication of a conservation easement located between the Project site's southern boundary and Van Buren Boulevard.

The Conservation Area would provide a buffer of at least 300 feet on all sides of the Development Area, with a larger buffer to the south and east of the Development Area. In addition, the Conservation Area includes the two bunkers that would be preserved for potential ongoing historical preservation or ongoing reuse. As previously noted in Section 1.3.2.1, Development Area, to further protect the Conservation Area the Project proposes three open space areas, including an additional 30-foot-wide landscaped buffer on the proposed parcels to the north, west, south, and southeast of the Development Area. The currently existing service roads within the Conservation Area, as depicted by the red lines on Figure 6, may continue to be utilized by the public for passive recreation as authorized by the March JPA, but public vehicular access would be prohibited.

1.3.3 Requested Approvals and Entitlements

To facilitate Project approval, the following approvals and entitlements would be required.

General Plan Amendment. The Project proposes to amend the site's General Plan Land Use designations as follows:

- Increase Parks/Recreation and Open Space (P/R/OS) from approximately 122 gross acres to 453.7 gross acres.³
- Eliminate approximately 622.5 gross acres of Business Park designated property.
- Eliminate approximately 63 gross acres of Industrial designated property.
- Adopt the Meridian West Upper Plateau Specific Plan (SP-9) on approximately 351.0 gross acres, approving a mix of Business Park, Industrial, Mixed Use, Public Facility, Streets, Parks, and Open Space land uses.

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² This acreage includes the 15-acre water quality area, in addition to 10 acres shown as developable area, in Figure 6.

³ A total of 8.62 acres within the 453.7 gross acres consists of streets located within the Conservation Area.

 Amend the General Plan from Business Park to Public Facility on 2.9 acres to accommodate an existing water storage tank operated by WMWD.

In addition, the approximately 445-acre Conservation Area will be recorded. The amendment would modify the General Plan Land Use Plan, Table 1-1 (March JPA Planning Build Out); Exhibit 2-1, Transportation Plan; and Exhibit 2-3, Transportation Road Systems (March JPA 1999). The amendment to the Transportation Element of the General Plan will incorporate the following changes:

- Extend Cactus Avenue west to Barton Street.
- Extend Barton Street from Alessandro Boulevard to Barton Drive.
- Extend Brown Street from Alessandro Boulevard to Cactus Avenue.
- Add Arclight Drive, Linebacker Drive, Bunker Hill Drive, and Airman Drive.

Specific Plan. The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13 containing development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop the Project site consistent with the requested General Plan Amendment designations. The proposed Specific Plan will address land uses, zoning, and design guidelines.

The proposed land uses within Specific Plan SP-9 include the following:

- 43.08 acres of Mixed Use
- 66.35 acres of Business Park
- 143.34 acres of Industrial
- 28.86 acres of streets and roadways⁴
- 10 acres of developed Parks/Recreation/Open Space
- 64.46 acres of undeveloped Parks/Recreation/Open Space
- 3.53 acres of Public Facilities

Total gross acreage = 359.62.

Zoning Designation. The Project site has not previously been given a zoning designation; therefore, the Project proposes zoning consistent with the requested General Plan Amendment and Specific Plan designations of Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facilities for the site.

Plot Plan. Concurrent with the General Plan and Zoning Amendments, the Specific Plan, and the Tentative Tract Map, Plot Plan approval is required to construct an approximately 1,330,000-square-foot industrial building on 59.55 acres, a 550,000-square-foot industrial building on 27.58 acres, and a 10.00-acre park with two small parking lots for recreational users to access the larger open space area.

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⁴ Included in this area are 8.62 acres of streets and roadways that are within the Specific Plan but not within the General Plan.

1.4 California Environmental Quality Act Compliance

This Initial Study has been prepared in conformance with Sections 15063 and 15064 of the CEQA Guidelines (14 CCR 15000 et seq.) and the March JPA Local CEQA Guidelines. The purpose of the Initial Study Checklist/ Environmental Evaluation is to identify any potentially significant impacts associated with the proposed Project, and to document the forthcoming intended analysis in an EIR. March JPA is the lead agency responsible for the review and approval of the proposed Project.

CEQA establishes mechanisms whereby the public and decision makers can be informed about the nature of the project being proposed, and the extent and types of impacts that the project and its alternatives would have on the environment should the project or alternatives be implemented. Pursuant to Section 15082 of the CEQA Guidelines, the Notice of Preparation (NOP) for the proposed Project was published on November 19, 2021, in the Press Enterprise, concurrent with the release of the Notice of Preparation and the Initial Study for public review. The baseline for a project is typically the physical environmental conditions that exist in the vicinity of a project and on the project site when the NOP is published (14 CCR Section 15125[a][1]). The existing setting within and adjacent to the Project site is discussed in Section 1.3.1, Project Location. The NOP states that an EIR will be prepared. The NOP was sent to the Office of Planning and Research and each responsible and trustee agency and was filed with the Riverside County Clerk.

1.5 Other Discretionary Approvals

The following additional discretionary permits and approvals may be necessary as part of Project approval:

- State Water Resources Control Board (SWRCB) A National Pollutant Discharge Elimination System Construction General Permit (permit registration documents include a Stormwater Pollution Prevention Plan [SWPPP])
- Regional Water Quality Control Board, Santa Ana Region 401 Water Quality Certification or a Waste Discharge Requirement Permit from the Regional Water Quality Control Board (401 certification is needed if a U.S. Army Corps of Engineers Section 404 permit is needed)
- U.S. Army Corps of Engineers A Jurisdictional Determination to identify and locate the boundaries of
 jurisdictional waters of the United States on the Project site, and, if jurisdictional waters are impacted, a
 permit pursuant to Section 404 of the Clean Water Act
- California Department of Fish and Wildlife A 1602 Streambed Alteration Agreement

1.6 Public Review Process

Once the lead agency releases the NOP and the Initial Study, the public has 30 days to provide the lead agency with written comments on the proposed Project (14 CCR 15082[b]). During the 30-day review period, pursuant to CEQA Guidelines Section 15082(c), an open house scoping meeting will be held at 6:00 p.m. to 7:30 p.m. on December 8, 2021, at the Western Municipal Water District Training Room, First Floor, Room 120, located at 14205 Meridian Parkway, Riverside, California 92518. The written comments received on the NOP during the public comment period, as well as those written comments received at the scoping meeting, will be considered and included in the Draft EIR.

2 Environmental Checklist Form

1. Project title:

West Campus Upper Plateau Project

2. Lead agency name and address:

March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, California 92518

3. Contact person and phone number:

Dan Fairbanks, Planning Director

Main: 951.656.7000

4. Project location:

See Section 1.3.1, Project Location.

5. Project sponsor's name and address:

Meridian Park West, LLC Attn: Timothy Reeves 1156 North Mountain Avenue Upland, California 91785

6. General plan designation:

Business Park (BP) and Park/Recreation/Open Space (P/R/OS)

7. Zoning:

Existing: No Zoning Designation

Proposed: Mixed Use, Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), Public Facilities

8. Description of project:

See Section 1.3.2, Project Components.

9. Surrounding land uses and setting:

See Section 1.3.1, Project Location.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

See Section 1.5, Other Discretionary Approvals.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with Assembly Bill 52 and Senate Bill 18, March JPA will conduct government-to-government consultation with Native American tribes. Results of the consultation process will be included in the EIR prepared for the proposed Project.

3 Environmental Determination

Determination (by the Lead Agency) On the basis of this initial evaluation: I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared. \boxtimes I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed. I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or

mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Dan Jailandes Signature

November 18, 2021
Date

4 Initial Study Checklist

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

	Aesthetics		Agriculture and Forestry Resources		Air Quality
	Biological Resources	\boxtimes	Cultural Resources		Energy
	Geology and Soils		Greenhouse Gas Emissions	\boxtimes	Hazards and Hazardous Materials
	Hydrology and Water Quality		Land Use and Planning		Mineral Resources
	Noise	\boxtimes	Population and Housing		Public Services
	Recreation		Transportation		Tribal Cultural Resources
\boxtimes	Utilities and Service Systems	\boxtimes	Wildfire		Mandatory Findings of Significance

Evaluation of Environmental Impacts

- 1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an Environmental Impact Report (EIR) is required.
- 4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they

- reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).
- 5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
- 8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9. The explanation of each issue should identify:
 - d. The significance criteria or threshold, if any, used to evaluate each question; and
 - e. The mitigation measure identified, if any, to reduce the impact to less than significance.

4.1 Aesthetics

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
l.	AESTHETICS - Except as provided in Public Re	esources Code S	Section 21099, wo	ould the project:	
a)	Have a substantial adverse effect on a scenic vista?	\boxtimes			
b)	Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				

a) Would the project have a substantial adverse effect on a scenic vista?

Potentially Significant Impact. According to Exhibit 5-4, Scenic Corridors/Gateway, of the March JPA General Plan, the areas from the Project site looking east and northeast of the March JPA planning area toward the San Bernardino, San Jacinto, and Box Spring Mountains are designated as scenic vistas (March JPA 1999). The Project site contains existing development and previously disturbed land, and most of the Conservation Area consists of open space and undeveloped land. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on a scenic vista.

However, buildout of the proposed Development Area would involve the development of a ring of seven Business Park parcels, three Mixed Use parcels, one Industrial parcel, and two Public Facilities parcels surrounding two Industrial parcels, a park/open space area with two small adjacent parking lots, two smaller open space areas, and a smaller park for recreational users. Although east of the Development Area are existing industrial developments, the maximum height of the proposed buildings are unknown at this time and therefore additional information is needed to determine whether the proposed Project would have a substantial adverse effect on a scenic vista. A Specific Plan (SP-9) is currently being prepared for the proposed Project that would include design specifics as well as development standards, including maximum height of the proposed development facilities, and procedures necessary to develop the Project site

consistent with the requested General Plan Amendment designations. Until the Specific Plan is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on scenic resources. The Development Area is located on a primarily vacant/previously developed lot. According to the California Department of Transportation (Caltrans) California Scenic Highway Program, no officially designated or eligible state scenic highways are located adjacent to or near the Project site (Caltrans 2021). Therefore, implementation of the proposed Project would not damage scenic resources within a state scenic highway. No impact would occur, and this issue will not be further evaluated in the EIR prepared for the proposed Project.

c) In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Potentially Significant Impact. The Project site is located in a non-urbanized area, per the Southern California Association of Governments Region U.S. Census Urbanized Areas map (SCAG 2017). The Project site is visible from public vantage points along adjacent and nearby roadways, including Alessandro Boulevard and I-215, respectively. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on the existing visual character or quality of public views of the site and its surroundings.

Although the Development Area is surrounded by existing development and consists of former military bunkers, barbed-wire/chain-link security fencing, a water storage tower, other facilities associated with a military weapons storage facility, and previously disturbed land, the Development Area is overgrown. Therefore, the buildout of the Development Area may change the overall visual character of the site. Additional information is needed to determine whether buildout of the proposed Development Area would have a substantial adverse effect to the overall visual character of the site. A Specific Plan is currently being prepared for the proposed Project that would include design specifics as well as development standards and procedures necessary to build out the Development Area consistent with the requested General Plan Amendment designations. Until the Specific Plan is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. Currently, the sources of nighttime light and glare are from the residential developments to the north, west, and south of the Project site, as well as from the existing industrial buildings to the east. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are

anticipated as part of this action, the conservation easement would not create a new source of light or glare. Although the Development Area consists of previously disturbed land with existing development, including the bunkers, water tower, and connecting dirt roadways, there are no operating light sources on the site. Buildout of the proposed Development Area would add additional lighting to the area through the construction and operation of new industrial, business, and mixed-use facilities within the Development Area. The nearest residential area is located approximately 300 feet north of the Development Area. While buildout of the proposed Development Area has the potential to add additional light and glare to the area, development of the proposed facilities within the Development Area would be required to comply with Sections 9.08.100 (Lighting) and 9.10.110 (Light and Glare) of the March JPA Development Code. Compliance with these regulations would reduce light and glare impacts, however additional information is needed to determine whether the proposed Project would have a substantial adverse effect to daytime or nighttime views in the area. A Specific Plan is currently being prepared for the proposed Project that would include design specifics as well as development standards and procedures necessary to develop the Project site consistent with the requested General Plan Amendment designations. Until the Specific Plan is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

Less Than

4.2 Agriculture and Forestry Resources

		Potentially Significant Impact	Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
II.	AGRICULTURE AND FORESTRY RESOURCES – significant environmental effects, lead agenci Site Assessment Model (1997) prepared by the model to use in assessing impacts on agricultar resources, including timberland, are significant information compiled by the California Depart inventory of forest land, including the Forest at Assessment project; and forest carbon measure the California Air Resources Board. Would the	ies may refer to the California Depture and farmlar nt environmentatment of Forestrand Range Assesurement method	the California Agri partment of Conse nd. In determining I effects, lead age y and Fire Protecti ssment Project an	cultural Land Evervation as an opervation as an opervation whether impact encies may refer on regarding the dathe Forest Leg	aluation and otional s to forest to estate's
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?				
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				\boxtimes
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. Per the State of California Department of Conservation Farmland Mapping and Monitoring Program, the Project site is located within areas designated as Farmland of Local Importance; however, the Project site is not located within an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2018a). The site is designated as "Urban and Built Up Land," "Vacant or Disturbed Land," and "Non-Irrigated Farmland" per the California Important Farmland Finder for Riverside County (DOC 2018a). The Project site is located within March JPA's land use jurisdiction, adjacent to March ARB, and is not currently used for farming or agricultural activities. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action and the Project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, no impact would occur. Therefore, this issue will not be further analyzed in the EIR prepared for the proposed Project.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site and surrounding area does not encompass agricultural resources or land under a Williamson Act contract. The March JPA General Plan designates the site as Business Park (BP) and Park/Recreation/Open Space (P/R/OS) (March JPA 1999). As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action and the Project site does not contain agricultural land, no impact would occur. Therefore, this issue will not be further analyzed in the EIR prepared for the proposed Project.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The Project site is designated Business Park (BP) and Park/Recreation/Open Space (P/R/OS) under the March JPA General Plan, which does not allow for timberland production. In addition, there are no forest lands on or in the vicinity of the Project site. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species.

As no physical changes are anticipated as part of this action and the Project site does not contain forest land, no impact would occur. Therefore, this issue will not be further analyzed in the EIR prepared for the proposed Project.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As discussed in Section 4.2(c), there are no forest lands on or in the vicinity of the Project site. Therefore, the proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur, and this issue will not be further analyzed in the EIR prepared for the proposed Project.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As described in Sections 4.2(a) and 4.2(b), no portion of the Project site is located within existing agricultural areas, nor would implementation of the proposed Project result in any impacts to ongoing agricultural operations or the conversion of farmland to non-agricultural use. The Project site is designated Business Park (BP) and Park/Recreation/Open Space (P/R/OS) under the March JPA General Plan (March JPA 1999) and is surrounded by residential and industrial development. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action and the Project site does not contain farmland and/or forest land, the proposed Project would not result in the conversion of existing farmland or forest land to non-agricultural or non-forest uses. In addition, the proposed Project would not result in the loss of any forest land, nor would it conflict with any zoning provisions for either agriculture or forest land and timberland. No impact would occur, and this issue will not be further analyzed in the EIR prepared for the proposed Project.

4.3 Air Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
III.	III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	\boxtimes			
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?				
c)	Expose sensitive receptors to substantial pollutant concentrations?	\boxtimes			

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Project site is located within the South Coast Air Basin, under the jurisdiction of the South Coast Air Quality Management District, which is principally responsible for air pollution control. The South Coast Air Quality Management District has adopted a series of Air Quality Management Plans to meet the state and federal ambient air quality standards. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not conflict with or obstruct an air quality plan.

However, construction and operation of the proposed Development Area could result in criteria pollutant emissions, and additional analysis is necessary to determine whether the Development Area would conflict with or obstruct implementation of the applicable air quality plan. As such, an air quality technical study is being prepared for the proposed Development Area to assess potential conflicts with applicable air quality plans. Until the air quality technical study is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not result in an increase of any criteria pollutant. However, buildout of the Development Area could result in a temporary addition of pollutants to the local airshed caused by soil disturbance, fugitive dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially day to day, depending on the level of activity, the specific type of activities, the equipment used, and for dust, the prevailing weather conditions. During operations, the proposed Development Area would introduce new sources of emissions. Thus, the proposed Project has the potential to result in a cumulatively considerable net increase of a criteria pollutant for which the region is in non-attainment under federal or state ambient air quality standards. Until the air quality technical study is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not expose sensitive receptors to pollutant concentrations. However, construction and operation of the proposed Development Area has the potential to create air emissions in quantities that could violate air quality standards. The closest sensitive receptors (single-family residences) are located approximately 300 feet north of the Development Area. Although these sensitive receptors are buffered from the site by the Conservation Area, further analysis is required to determine whether the proposed Project would expose sensitive receptors to substantial pollutant concentrations. As such, exposure of nearby sensitive receptors to substantial pollutant concentrations will be evaluated as part of the air quality technical study and health risk assessment being prepared for the Project. The studies will analyze whether the proposed Project would expose sensitive receptors to substantial pollutant concentrations during both construction and operation. Until these studies are provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not expose sensitive receptors to pollutant concentrations. However, odors from vehicles and/or equipment exhaust emissions would be generated during buildout of the proposed Development Area. Odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment and to architectural coatings associated with building painting during construction. Sensitive receptors who could be subjected to these odors would include residences to the north, west, and south of the Project site. Therefore, impacts associated with odors during construction would be potentially significant.

Land uses and industrial operations that are typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding operations. Once constructed, the proposed Development Area would include the operation of industrial buildings that may require the operation of heavy equipment. These activities could generate odors in the general vicinity of the Project site. Although operation of the Industrial, Business, Mixed Use, and Public Facilities would not by itself generate odors, the ancillary uses that the facilities would serve could generate odors that would have the potential to adversely affect people working or residing in the general vicinity of the Project site. Until the air quality technical study is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

4.4 Biological Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV.		: '	T	Γ	Г
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact. Surrounded by existing development, the Project site consists of previously disturbed land with some existing development. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. Although the proposed Project would include a Conservation Area of approximately 445 acres of undisturbed

land surrounding the Development Area, consistent with prior determinations made as part of the CBD Settlement Agreement, the Development Area could contain candidate, sensitive, or special-status plant and wildlife species. Additional information is needed to determine whether construction and operation of the proposed Development Area could directly or indirectly (e.g., through habitat modification) result in impacts to species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. A biological technical report is being prepared to address these resources. Until the biological technical report is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

Potentially Significant Impact. Surrounded by existing development, the Project site consists of previously disturbed land with some existing development. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. Although the proposed Project would include a Conservation Area of approximately 445 acres of undisturbed land surrounding the Development Area, consistent with prior determinations made as part of the CBD Settlement Agreement, the Development Area could contain riparian habitat and/or other sensitive natural communities. Additional information is needed to determine whether construction and operation of the proposed Development Area could have a substantial adverse effect on a sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. A biological technical report is currently being prepared for the proposed Project. Until the biological technical report is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

c) Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Potentially Significant Impact. Surrounded by existing development, the Project site consists of previously disturbed land with some existing development. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not remove and/or fill state or federally protected wetlands. Conversely, buildout of the proposed Development Area has the potential to affect state and/or federally protected wetlands. Therefore, a biological technical report is being prepared for the proposed Project to address the presence of protected wetlands and whether the proposed Project would have a substantial adverse effect on this resource. Until the biological technical report is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Potentially Significant Impact. The Project site consists of previously disturbed land with some existing development. The proposed Project would include a Conservation Area of approximately 445 acres of undisturbed land surrounding the Development Area, consistent with prior determinations made as part of the CBD Settlement Agreement, as well as two wildlife crossings along Cactus Avenue that would provide connections for wildlife movement within the Conservation Area located along the east side of the proposed Project site. However, buildout of the Development Area, which may serve as an existing wildlife corridor, could substantially interfere with movement of a native wildlife species. Until the biological technical report is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species consistent with prior determinations made as part of the CBD Settlement Agreement. A biological technical report is being prepared for the proposed Development Area to addresses whether buildout of the Development Area would conflict with any local policies or ordinances protecting biological resources. Until the biological technical report is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Potentially Significant Impact. The Project site is located within the boundaries of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) (County of Riverside 2003). However, March JPA is not a Permittee to the Western Riverside County MSHCP and thus is not required to have its projects reviewed by the Regional Conservation Authority, California Department of Fish and Wildlife, and U.S. Fish and Wildlife Service to determine consistency with the Western Riverside County MSHCP. Because March JPA is not a Permittee, any requirements specific to the MSHCP Reserve Assembly (i.e., conservation requirements) are not applicable to the proposed Project. Although the site was not located in the plan area of the Riverside County Habitat Conservation Authority 1996 Stephens' Kangaroo Rat Habitat Conservation Plan (Riverside County Habitat Conservation Agency 1996), the CBD Settlement Agreement requires conservation of Stephens' Kangaroo Rat habitat while allowing for the development of portions of the March Stephens' Kangaroo Rat Management Area/March ARB west campus where the Project site is located (March JPA 2012).

Although March JPA is not a Permittee to either of the regional Habitat Conservation Plans mentioned above, pursuant to CEQA, the proposed Project must still demonstrate that there would be no conflicts with either Habitat Conservation Plan. All federally and state-listed plant and wildlife species, as well as candidate and sensitive species and species of special concern, and their associated sensitive habitats

would be addressed in compliance with all applicable regulations. In addition, any riparian, riverine, and wetland features would be addressed consistent with applicable regulations.

A biological technical report is being prepared that will address the existing biological resources present on the Project site, potential impacts to these resources, and any applicable mitigation for impacts to these resources. The biological technical report will also address any conflicts with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan, if applicable. As such, this topic will be analyzed in the EIR prepared for the proposed Project.

4.5 Cultural Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
٧.	CULTURAL RESOURCES – Would the project:				
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	\boxtimes			
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	\boxtimes			
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	\boxtimes			

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not change the significance of a historical resource. However, because the construction of the proposed Development Area would include ground-disturbing activities, a cultural resources technical report is being prepared for the proposed Project that will identify potential impacts to historical resources and properties under CEQA and Section 106 of the National Historic Preservation Act. A California Historical Resources Information System records search for the Project site and a 1-mile radius will be conducted at the Eastern Information Center to identify any previously recorded cultural resources that may be located within the search area. The California Native American Heritage Commission (NAHC) will also be contacted for a review of its Sacred Lands File. In addition, an intensive-level pedestrian survey of the Development Area will be conducted to identify any observed cultural resources, including prehistoric and historic archaeological resources and potential historic built-environment resources, such as the former munitions bunkers and culverts. The analysis of impacts to historical resources, along with the potential for feasible mitigation measures, requires additional analysis. Until the cultural resources technical report is provided and potential

mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not change the significance of an archaeological resource. However, because buildout of the Development Area would result in ground-disturbing activities that could result in the discovery of unknown archaeological resources within the Project impact area, a cultural resources technical report is being prepared for the proposed Project that will identify potential impacts to archaeological resources. The Senate Bill 18 consultation process will be initiated by March JPA with the NAHC-listed tribes for the Project provided by the NAHC response. In addition, in accordance with Assembly Bill 52, agency-to-agency consultation by March JPA will be conducted by sending a formal notice to inform California Native American tribes that have requested such notice of a project application within a geographic area with which the tribe is traditionally and culturally affiliated. Until the cultural resources technical report is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not disturb any human remains. The proposed Development Area is previously disturbed land with existing development. In the unlikely event that human remains are discovered, state and local laws require that the County Coroner be notified. California Public Resources Code Section 5097.98 addresses the disposition of Native American burials in archaeological sites, and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the NAHC to resolve disputes regarding the disposition of such remains. The proposed Project will be required to comply with California Public Resources Code Section 5097.98 should any unknown human remains be discovered during site disturbance. In addition, Sections 7050.5, 7051, 7052, and 7054 of the California Health and Safety Code collectively address the illegality of interference with human burial remains and the disposition of Native America burials in archaeological sites. The law protects such remains from disturbance, vandalism, or inadvertent destruction, and establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project, including the treatment of remains prior to, during, and after evaluation, and reburial procedures. As such, it is anticipated that through the inclusion of appropriate mitigation measures and compliance with state and local laws in the event that human remains are discovered, impacts would be less than significant. However, because this topic is related to other topics that will be included in the cultural resources technical report currently being prepared for the proposed Project, impacts related to this topic are considered potentially significant for the purpose of this Initial Study. Therefore, this topic will be carried forward for further analysis in the EIR.

4.6 Energy

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy – Wou	VI. Energy – Would the project:				
environmenta inefficient, or	ntially significant I impact due to wasteful, unnecessary consumption of ces, during project or operation?				
,	r obstruct a state or local plan energy or energy efficiency?	\boxtimes			

a) Would the project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not result in the consumption of energy. However, construction and operation of the proposed Development Area would result in the consumption of energy resources, and additional information is needed to determine if such energy usage would be wasteful, inefficient, or unnecessary. An energy assessment report is being prepared for the proposed Project that will identify potential impacts regarding energy use. Until the energy assessment report is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. However, construction and operation of the proposed Development Area would result in the consumption of energy resources, and additional information is needed to determine whether such energy usage would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. An energy assessment report is being prepared for the proposed Project that will identify potential impacts regarding energy use. Until the energy assessment report is provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

4.7 Geology and Soils

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	GEOLOGY AND SOILS - Would the project:	T	T	T	
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				
	ii) Strong seismic ground shaking?	\boxtimes			
	iii) Seismic-related ground failure, including liquefaction?				
	iv) Landslides?				
b)	Result in substantial soil erosion or the loss of topsoil?				
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?				
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				

- a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. The nearest fault zone, the San Jacinto Fault zone, is located approximately 10 miles east of the Project site (DOC 2018b). As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action. the conservation easement would not result in the rupture of a fault. However, construction of the proposed Development Area would be required to meet California Building Code standards. In addition, March JPA would review and approve the plans and specifications of the proposed Development Area to ensure compliance with the provisions of the California Building Code and Title 24 of the California Code of Regulations (California Building Standards Code; Title 24), which regulates building standards. Title 24 is administered by the California Building Standards Commission, which, by law, is responsible for coordinating all building standards. Under state law, all building standards must be centralized in Title 24 or they are not enforceable. Because the Project site is not within an Alguist-Priolo Earthquake Fault Zone, pursuant to the California Department of Conservation's Fault Activity Map of California (DOC 2018b), and given that the proposed Project is required to comply with the provisions of the California Building Code and Title 24, the potential for exposing people or structures to potential substantial adverse effects, including risk of loss, injury, or death involving rupture of a known Alquist-Priolo earthquake fault is low. Therefore, a less than significant impact is expected, and this topic will not be further analyzed in the EIR prepared for the proposed Project.

ii) Strong seismic ground shaking?

Potentially Significant Impact. The Project site is located in tectonically active Southern California. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. Because no physical changes are anticipated as part of this action, the conservation easement would not result in impacts related to seismic ground shaking. However, the proposed Project has the potential to be exposed to strong seismic ground shaking and additional information is required to determine whether impacts would be potentially significant, or whether impacts may be mitigated through standard construction procedures. As such, a geotechnical investigation is being prepared for the proposed Project that will assess potential impacts related to strong seismic ground shaking. Until the results of the geotechnical investigation are provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

iii) Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. According to Figure S-3 (Generalized Liquefaction) of the County of Riverside General Plan Safety Element, the Project site is located within a moderate to low liquefaction susceptibility area (County of Riverside 2019). As part of the Project, the Conservation

Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not result in seismic-related ground failure. However, within the proposed Development Area the potential for seismic-related ground failure, including liquefaction, exists. A geotechnical investigation is being prepared for the proposed Project to address potential liquefaction impacts. Until the geotechnical investigation is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

iv) Landslides?

Less Than Significant Impact. The Project site and surrounding area are relatively flat. According to Figure S-4 of the County of Riverside General Plan Safety Element, the Project site is not located on, adjacent to, or near an earthquake-induced slope instability or landslide area (County of Riverside 2019). As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not result in landslides. In addition, the proposed Development Area would undergo staff review by March JPA to ensure that grading activities would not be subject to, or result in, landslides. Therefore, a less than significant impact is expected, and this topic will not be further analyzed in the EIR prepared for the proposed Project.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not result in soil erosion. However, construction activities such as excavation and grading of the Development Area may have the potential to cause short-term soil erosion or the loss of topsoil. Short-term erosion effects during construction of the proposed Development Area would be minimized through implementation of a Stormwater Pollution Prevention Plan (SWPPP) as required in compliance with the National Pollutant Discharge Elimination System program, and through incorporation of best management practices intended to reduce soil erosion. A SWPPP will be prepared for the proposed Project by March JPA to comply with the National Pollutant Discharge Elimination System program. The SWPPP is required by the March JPA during plan review and approval of the proposed Development Area improvement plans. The SWPPP may include standard construction methods, such as temporary detention basins, to control on-site and off-site erosion. With implementation of an approved SWPPP, impacts resulting from soil erosion or loss of topsoil would be minimized. Therefore, a less than significant impact is expected, and this topic will not be further analyzed in the EIR prepared for the proposed Project.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Potentially Significant Impact. Refer to Sections 4.7(a)(i) through 4.7(a)(iv) regarding the risk of strong seismic shaking, lateral spreading, landslides, subsidence, and liquefaction. No physical changes are anticipated as part of the conservation easement for the Conservation Area; however, the proposed

Development Area could consist of unstable soils, and additional information is needed to determine whether impacts would be significant. A geotechnical investigation is being prepared for the proposed Project to assess potential impacts related to geologic instability. Until the results of the geotechnical investigation are provided and potential mitigation measures are identified, as appropriate, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Potentially Significant Impact. Soil characteristics within the Project site are currently unknown; therefore, the site could be located on expansive soil. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not impact expansive soils. Additional information is needed to determine whether buildout of the proposed Development Area would result in a potentially significant impact regarding expansive soils. A geotechnical investigation is being prepared for the proposed Project, and until the results of the geotechnical investigation are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. Implementation of the proposed Project would not result in the need for a septic tank or alternative wastewater disposal system. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species, which would not impact the use of wastewater disposal systems. The proposed Development Area would connect to an existing sewer system and would not involve other alternative wastewater disposal methods. No impacts would occur, and this issue will not be further analyzed in the EIR prepared for the proposed Project.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not destroy a paleontological resource. However, construction of the proposed Development Area would result in ground-disturbing activities on vacant but previously disturbed portions of the Development Area, which could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, if present on site. Additional information is needed to determine whether impacts could be potentially significant; therefore, a paleontological resource report is being prepared for the proposed Project. Until the paleontological resource report is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

4.8 Greenhouse Gas Emissions

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS - Would the project:					
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				

a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not generate greenhouse gases (GHGs). However, construction and operation of the proposed Project would generate GHG emissions, and additional information is needed to determine if the proposed Project could directly or indirectly have a significant impact on the environment.

Assumptions regarding construction equipment to be used during each activity during construction of the proposed Development Area are shown in Table 3. Although the site-specific construction fleet may vary due to specific needs at the time of construction, the construction equipment noted in Table 3 is generally based on CalEEMod 2020.4.0 defaults.

Table 3. Construction Equipment Assumptions

Activity	Equipment	Number	Hours Per Day	Horsepower	Load Factor
Phase 1					
Site preparation	Crawler tractors	3	8	212	0.43
	Rubber-tired dozers	5	8	247	0.40
Grading	Crawler tractors	3	8	212	0.43
	Excavators	7	8	158	0.38
	Graders	2	8	187	0.41
	Rubber-tired dozers	2	8	247	0.40
	Scrapers	3	8	367	0.48

Table 3. Construction Equipment Assumptions

Activity	Equipment	Number	Hours Per Day	Horsepower	Load Factor
Phase 2					
Site preparation	Crawler tractors	3	8	212	0.43
	Rubber-tired dozers	5	8	247	0.40
Building construction	Cranes	2	8	231	0.29
	Crawler tractors	3	8	212	0.43
	Forklifts	6	8	89	0.20
	Generator sets	2	8	84	0.74
	Welders	2	8	46	0.45
Paving	Pavers	4	8	130	0.42
	Paving equipment	4	8	132	0.36
	Rollers	4	8	80	0.38
Architectural coating	Air compressors	2	8	78	0.48

Note: In order to account for fugitive dust emissions associated with site preparation and grading activities, crawler tractors were used in lieu of tractors/loaders/backhoes.

A GHG emissions analysis is being prepared for the proposed Project. The analysis will use the equipment assumptions in Table 3, along with the construction activity duration estimates included in Tables 1 and 2 in Section 1.3.2.1, to estimate annual GHG emissions. Until the GHG emissions analysis is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not generate conflict with any applicable GHG reduction plans, policies, or regulations. However, construction and operation of the proposed Development Area would generate GHG emissions, and additional information is needed to determine whether the proposed Project could conflict with an applicable plan, policy, or regulations adopted for the purpose of reducing GHG emissions; therefore, a GHG emissions analysis is being prepared for the proposed Project. Until the GHG emissions analysis is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

4.9 Hazards and Hazardous Materials

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX.	HAZARDS AND HAZARDOUS MATERIALS - Wo	ould the project:			
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d)	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	\boxtimes			

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As implementation of this action would not include transportation, use, or disposal of hazardous materials, the conservation

easement would not have a substantial adverse effect on the public or the environment related to hazardous materials.

However, information is needed to determine whether buildout of the proposed Development Area could create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during removal of the bunkers. In addition, information is also needed to determine whether operation of the proposed Project could create a significant hazard to the public and/or the environment. A Phase I Environmental Site Assessment (ESA) is being prepared for the proposed Development Area. If the Phase I ESA determines there is a potential for hazardous materials to be present in the sub-surface of the Project site, then a Phase II ESA will be prepared, which will evaluate the presence or absence of hazardous materials through the testing of soils within the Development Area.

March JPA Development Code Section 9.08.090 requires that Commercial, Office, and Industrial uses that receive, utilize, store, transport, or dispose of hazardous waste in quantities exceeding 500 pounds at one time shall have access to sewer and freeways and shall keep such materials at least 2,000 feet from residential areas. The March JPA Development Code, along with California Health and Safety Code Section 25505, would require the applicant to provide the Riverside County Fire Department (RCFD) and the Riverside County Environmental Health and Hazardous Materials Management Branch with a list of hazardous materials to be used at the site, a description of where and how each of these materials is stored, and how each material reacts in a fire. Placards or other appropriate signage shall be placed on all buildings in which hazardous materials or wastes are stored. Section 9.08.090 of the March JPA Development Code prohibits discharge of hazardous wastes into the air, land, or into water resources within the March JPA planning area and requires the preparation of a hazardous materials and waste management plan for any commercial and industrial uses that create, utilize, store, or treat hazardous materials or waste. The plan shall be subject to approval by the March JPA Planning Director, RCFD, and the Riverside County Health and Hazardous Materials Management Branch; shall undergo review by the Riverside County Sheriff's Department; and shall outline source reduction, treatment, handling, transportation, disposal, emergency response, and employee training methods. Further, uses that involve hazardous waste shall implement the best available technology for on-site pre-treatment and reduction of hazardous wastes, whenever feasible (March JPA 2016). Additionally, County of Riverside Ordinance 651.5 requires disclosure when businesses handle hazardous materials and the acquisition of a permit issued by the Department of Environmental Health for any owner or operator of a business where hazardous materials are handled. The proposed Project would also be subject to the California Occupational Safety and Health Administration Process Safety Management (PSM) program for chemicals designated as highly hazardous, which is based on the federal Occupational Safety and Health Administration program. In many instances, facilities subject to both the Risk Management Plan (RMP) and PSM requirements prepare a combined document (PSM/RMP) that addresses the requirements of these closely associated programs.

However, until the Phase I ESA and Phase II ESA are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. The proposed Project site includes two former military cleanup sites: Site 25, Munitions Residual Burial Site (previously known as Site 11), and Site 3, Landfill No. 5. These sites were identified during the Installation Restoration Program Records Search (Records Search) conducted by CH2M Hill for March AFB in 1984. The Records Search rated each site using the U.S. Air Force Hazard Assessment Rating Methodology (HARM). The HARM system considered four aspects of a hazard posed by a specific site: (1) the receptors of the contamination, (2) the waste and its characteristics, (3) potential pathways for waste contaminant migration, and (4) any efforts to contain the contaminants. Site 25 occupied an area of approximately 15 acres, a portion of which crossed over Landfill No. 5, and was used pre-1960 for munitions disposal. During the Records Search, the site did not receive a HARM rating as it was assumed that residues were relatively inert (CH2M Hill 1984). Site 25 was closed on May 12, 2004 (SWRCB 2021).

Landfill No. 5 occupied an area of approximately 23 acres and was used from 1954 to 1974 for the disposal of household and dumpster waste, construction debris, and military waste from the former base. The contaminants of concern for Landfill No 5. included volatile organic compounds, pesticides, polychlorinated biphenyls, polycyclic aromatic hydrocarbons, and munitions residues (SWRCB 2021). During the Records Search, the site received a HARM rating score of 64 (CH2M Hill 1984); however, the site was restored and was reported as closed on February 3, 1997 (SWRCB 2021).

As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on the public in relation to the release of hazardous materials.

However, buildout of the proposed Development Area would involve removal of existing bunkers and the construction and operation of Industrial, Business, Mixed Use, and Public Facilities. Any applicable permits would be obtained prior to removal of the bunkers currently in the Development Area. Furthermore, disposal of the demolished materials would comply with applicable regulations. Thus, the associated uses that would occur as a result of implementing the proposed Project could result in upset and accident conditions involving the release of hazardous materials into the environment. Additional information is needed to determine whether the proposed Project could create a significant hazard to the public. As noted in Section 4.9(a), a Phase I ESA and, if needed, a Phase II ESA are being prepared for the proposed Project. Until the Phase I ESA and, if prepared, a Phase II ESA are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The closest schools to the Project site, Benjamin Franklin Elementary School and Amelia Earhart Middle School, are located south of the Project site in the Orangecrest neighborhood. The Benjamin Franklin Elementary School is located approximately 0.8 miles south of the Project site and the Amelia Earhart Middle School is located approximately 1 mile south of the Project site; therefore, Project site is not

located within 0.25 miles of an existing or proposed school. No impact would occur, and this topic will not be further evaluated in the EIR prepared for the proposed Project.

d) Would the project be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. California Government Code Section 65962.5 combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances. The Department of Toxic Substances Control's EnviroStor database and SWRCB's GeoTracker database identify sites that have known contamination or sites for which there may be reasons to investigate further. According to the GeoTracker database, the Project site is not located on a site with known contamination (SWRCB 2021). In addition, according to the EnviroStor database, the Project site is not located on a hazardous materials site (DTSC 2021). Therefore, no impact would occur, and this issue will not be further evaluated in the EIR prepared for the proposed Project.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Potentially Significant Impact. The Project site is located within the March ARB Land Use Plan and is in the C1 Primary Approach/Departure Zone and C2 Compatibility Zones, which requires approval from the Airport Land Use Commission due to the site's proximity to the March Inland Port Airport. The C1 Zone is subject to high to moderate noise and moderate accident potential risk.

The C2 Zone is subject to moderate noise and a moderate to low accident potential risk. The land uses prohibited within the C1 Zone include hazards to flight, children's schools, hospitals, places of assembly, and noise-sensitive outdoor uses. The land uses prohibited within the C2 Zone include hazards to flight (such as tall objects) and noise-sensitive outdoor non-residential uses (such as stadiums, concert halls, and drive-in theaters, with special caution for nature preserves). Construction and operation of the proposed Development Area would have the potential to expose employees and nearby residents to safety hazards and excess noise due to the proximity of businesses and residences to the Project site. As such, a noise technical study is being prepared to assess potential impacts related to increased noise levels due to the proposed Project. Until the noise technical study is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. March JPA adopted a Disaster Preparedness and Recovery Plan in the Safety/Risk Management Element of the General Plan (March JPA 1999). This plan outlines the implementation programs needed to prevent risks to occupants and to minimize injury from an unavoidable disaster or emergency. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on an emergency response plan.

Entrances to the Development Area would be located along the north, south, and east sides of the Development Area. The north and south entrances would be accessed via Barton Street, which would be extended to connect from Alessandro Boulevard to Barton Drive as part of Project construction. The entrance to the east of the Project site would be located along Cactus Avenue, approximately 1 roadway mile west of the I-215/Cactus Avenue on-/off-ramp. The Project would also have an additional access point to the north via Brown Street, which the Project would extend southwards to connect from Alessandro Boulevard to the new extension of Cactus Avenue. In addition, buildout of the Development Area would include the construction of Arclight Drive, Airman Drive, and Bunker Hill Drive, which would provide access to the various parcels within the Development Area. Truck routes are proposed along Cactus Avenue to I-215, as well as along Arclight Drive, Airman Drive, and Bunker Hill Drive (Figure 5). Truck routes would be prohibited along the Barton Street extension through the development of a roundabout at the Cactus Avenue and Airman Drive intersection that would include signs deterring trucks from accessing Barton Street from Cactus Avenue. All roadways constructed as part of the Development Area would provide access for passenger and emergency vehicles. Furthermore, by extending Barton Street, Brown Street, and Cactus Avenue, buildout of the proposed Development Area would increase the connectivity between the existing residential communities to the north, west, and south, as well as the industrial development to the east.

An access driveway to the site would be provided on Cactus Avenue and Brown Street. According to the March JPA General Plan's Transportation Element, Cactus Avenue and Brown Street are classified as Major Arterial roadways, which provide access to I-215 to the east. Brown Street connects to Alessandro Boulevard (Arterial Highway) to the north, which then connects to I-215 to the east (March JPA 1999). The proposed site plan, including the access driveways, would be reviewed and approved by March JPA, the Riverside County Police Department, and RCFD during plan review to ensure that emergency access would be provided at all times. Any potential impacts created by buildout of the proposed Development Area would be mitigated to a level of less than significant with implementation of the Disaster Preparedness and Recovery Plan programs within the General Plan. Therefore, impacts would be less than significant, and this topic will not be further analyzed in the EIR prepared for the proposed Project.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Potentially Significant Impact. As indicated in the County of Riverside General Plan Safety Element Figure S-11 (County of Riverside 2019) and according to the Map My County – Riverside County database (County of Riverside 2021), the Project site is within a High Fire Hazard Severity Zone (HFHSZ). As a result, the proposed Project could have the potential to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Therefore, until further information is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. This topic will be analyzed in the EIR prepared for the proposed Project.

4.10 Hydrology and Water Quality

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Χ.	HYDROLOGY AND WATER QUALITY - Would the	ne project:			
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	 result in substantial erosion or siltation on or off site; 	\boxtimes			
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;				
	iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or				
	iv) impede or redirect flood flows?	\boxtimes			
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	\boxtimes			
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	\boxtimes			

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on water quality. However, because the Development Area consists of previously disturbed

land with some existing development and has a vegetated, pervious surface, buildout of the proposed Development Area would substantially increase the amount of impervious surface within the site. The addition of impervious surfaces within the Development Area could result in increased runoff and could violate water quality standards or waste discharge requirements or substantially degrade surface water or groundwater quality. The analysis of water quality and waste discharge requirements pertaining to surface water and groundwater quality requires additional analysis. As such, several studies are being prepared that will evaluate hydrology, water quality, and groundwater. Until these analyses are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, impacts related to surface water and groundwater quality will be analyzed in the EIR prepared for the proposed Project.

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on groundwater. However, because the Development Area consists of previously disturbed land with some existing development and has a vegetated, pervious surface, buildout of the proposed Development Area would increase the amount of impervious surface on the site. It is unknown at this time whether the Project proposes to extract groundwater; regardless, the increase in impervious surfaces could interfere with groundwater recharge and sustainability. As such, several studies are being prepared that will evaluate groundwater recharge. Until these analyses are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

- c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - i) Result in substantial erosion or siltation on or off site?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on the existing drainage. However, buildout of the proposed Development Area has the potential to modify the existing drainage pattern of the site by removal of the existing bunkers and by constructing a ring of seven Business Park parcels, three Mixed Use parcels, one Industrial parcel, and two Public Facilities parcels surrounding two Industrial parcels, a park/open space area with two small adjacent parking lots, two smaller open space areas, and a smaller park for recreational users where pervious landscapes and minimal structures currently exist. The analysis of drainage pattern impacts relative to erosion and siltation requires additional analysis; as such, several studies are being prepared that will cover erosion and siltation impacts. Until these analyses are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have substantially increase the rate of flooding. Buildout of the proposed Development Area has the potential to substantially increase the rate or amount of surface runoff within the Project site by constructing impervious surfaces, including a ring of seven Business Park parcels, three Mixed Use parcels, one Industrial parcel, and two Public Facilities parcels surrounding two Industrial parcels, an open space area with two small parking lots, two smaller open space areas, and a small park for recreational users, where no structures or impervious landscapes currently exist. The analysis of an increase in the rate of surface water runoff coming from the Development Area requires additional study. As such, several studies are being prepared that will evaluate surface water runoff as it relates to flooding on and off site. Until these analyses are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not create runoff water. However, buildout of the Development Area has the potential to create or contribute to runoff water that could exceed the capacity of the stormwater drainage systems or provide substantial additional sources of polluted runoff. The Development Area is previously disturbed land that is primarily vacant, and consists of a pervious landscape; thus, any new additional impervious surfaces constructed within the Development Area could increase the rate at which stormwater runoff exits the site, which could result in runoff amounts that exceed the capacity of the existing stormwater infrastructure. Because buildout of the Development Area would include the construction of Industrial, Business Park, Mixed Use, and Public Facility parcels where no structures or impervious landscapes currently exist, the proposed Project could result in a significant impact related to surface water runoff. The analysis of an increase in the rate of surface water runoff coming from the Project site requires additional study. As such, several studies are being prepared that will evaluate the potential for the proposed Project to create or contribute to runoff water that could exceed drainage infrastructure capabilities or result in additional sources of polluted runoff. Until these analyses are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

iv) Impede or redirect flood flows?

Potentially Significant Impact. The Project site is not located within a Federal Emergency Management Agency (FEMA) mapped Special Flood Hazard Area subject to inundation by the 1% annual chance flood. However, the site is located within Zone D (areas in which flood hazards are undetermined, but possible) on FEMA Flood Insurance Rate Map 06065C0740G (FEMA 2008). As

part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not impede or redirect flood flows. However, additional information is needed to determine whether there are existing drainage features traversing the Development Area. A hydrology/drainage study is currently being prepared for the Development Area to evaluate the potential for the proposed Project to impede or redirect flood flows. Until additional information is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

d) In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

Potentially Significant Impact. The Project site is located approximately 37 miles east of the Pacific Ocean and 6.7 miles northwest of Lake Perris. Due to the distances between the Project site and these water bodies, there is no risk of release of pollutants due to tsunami or seiche.

As indicated in Section 4.10(c)(iv), the Project site is not located in a FEMA-designated 100-year floodplain but is within a designated Zone D, which includes areas where flood hazards are undetermined, but possible. The risk of flooding that would specifically result in the release of pollutants due to Project inundation may be minimal. However, until additional information is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not conflict with a water quality control plan or sustainable groundwater management plan. However, because buildout of the proposed Development Area would involve the construction of new buildings, create new impervious surfaces, involve off-pavement construction operations, and require ground-disturbing activities, it has the potential to conflict with existing water quality or groundwater management plans. Additional analysis is required to determine whether buildout of the proposed Development Area would conflict with such plans. As such, several studies are being prepared that will evaluate whether the proposed Development Area has the potential to conflict with or obstruct implementation of an applicable water quality control plan or sustainable groundwater management plan. Until these analyses are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

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4.11 Land Use and Planning

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI.	LAND USE AND PLANNING - Would the project	ot:			
a)	Physically divide an established community?				
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				

a) Would the project physically divide an established community?

Less Than Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not physically divide an established community. The proposed Development Area would be located within approximately 360 acres of the 808-acre Project site within the March JPA planning area. The previously disturbed Development Area is surrounded to the north, west, and south by residential developments, and to the east by industrial developments. The Project site is located within the boundaries of the March ARB Redevelopment Project and has been designated for Business Park (BP) and Park/Recreation/Open Space (P/R/OS) in the March JPA General Plan prepared for the site in 1999. As previously described in Section 1.3.3, Requested Approvals and Entitlements, a General Plan Amendment is currently being prepared to redesignate the site's land. The Project proposes to redesignate the site's land uses on the General Plan Land Use Map to Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities. The Development Area would therefore connect the residential communities to the north, west, and south, as well as the industrial area to the east. Therefore, the Project would not divide an established community and impacts would be less than significant, and this impact will not be analyzed in the EIR prepared for the proposed Project.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. As shown on Figure 2 and described in Section 4.11(a), the Project site's land use designation is Business Park (BP) and Park/Recreation/Open Space (P/R/OS). The entire site is not yet zoned per the March JPA Zoning Map, as shown on Figure 3. As previously stated, the proposed Project includes a General Plan Amendment that is currently being prepared to redesignate the site's land uses to Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities. A Specific Plan is also currently being prepared to develop the Project site consistent with the requested General Plan Amendment designations. In addition, a Zoning Amendment is being prepared to make the zoning consistent with the General Plan Amendment and Specific Plan designations.

Regarding airport land use compatibility regulations, the Project site is within the boundaries of the March ARB/Inland Port Airport Land Use Compatibility Plan (ALUCP) and March ARB Air Installations Compatible Use Zones (AICUZ) study area. The Project site is in the C1 compatibility zone, which his designated as a Moderate to High Noise Zone. The Project site is also located in the C2 compatibility zone, which is a designated Moderate Noise Zone, as identified under the March ARB/Inland Port ALUCP (Riverside County ALUC 2014). The C1 zone is subject to moderate to high noise impact, and the C2 zone is subject to a moderate noise impact, which may be disruptive to noise-sensitive land uses. Industrial land uses are an allowed use within this zone, per Table MA-2 of the ALUCP. In addition, the site is within the 60-decibel community noise equivalent level (60 dBA CNEL) noise contour zone, as identified in the ALUCP and AICUZ (Riverside County ALUC 2014; Air Force Reserve Command 2018). Industrial land uses are an allowable use within this noise contour per the AICUZ and ALUCP.

Although it is not anticipated that the conservation easement would conflict with the provisions of land use documents, additional information is needed to determine whether the Project Site in its entirety would conflict with the provisions of any land use plan, policy, or regulation. Until the General Plan Amendment, Specific Plan, and Zoning Amendment are provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

4.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b) Result in the loss of availability of a locally- important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. According to Figure OS-6 of the County of Riverside General Plan Multipurpose Open Space Element, the Project site is located within the Mineral Resource Zone 3 (MRZ-3), which is classified as an area where the significance of mineral deposits is undetermined (County of Riverside 2015). The Project site's land use designation is Business Park and Park/Recreation/Open Space; however, a General Plan Amendment is being prepared to redesignate the site's land uses as Mixed Use, Business Park, Industrial, Parks/Recreation/Open Space, and Public Facilities. This land use designation does not allow for mining activities (March JPA 2016). In addition, the site is surrounded by residential and industrial land uses in the local vicinity that would be incompatible with a mining operation on the site. Furthermore, the

conservation easement would not result in any physical changes. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state. There would be no impacts related to this topic, and this issue will not be analyzed in the EIR prepared for the proposed Project.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As discussed in Section 4.12(a), the Project site is not designated as a locally important mineral resource recovery site. Furthermore, the conservation easement would not result in any physical changes. Therefore, the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land use plan. There would be no impacts related to this topic, and this issue will not be further evaluated in the EIR prepared for the proposed Project.

4.13 Noise

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII	. NOISE - Would the project result in:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b)	Generation of excessive groundborne vibration or groundborne noise levels?				
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
d)	Aircraft operations (i.e., aircraft landings and/or takeoffs) at the March Inland Port Airport between 10:00 p.m. and 6:59 a.m. that could expose people within the March Inland Port Airport's vicinity to a significant risk of sleep disturbance due to noise, as based on a single event noise exposure level analysis?				

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect related to the generation of ambient noise. However, the proposed Development Area would involve construction and operation of a ring of seven Business Park parcels, three Mixed Use parcels, one Industrial parcel, and two Public Facilities parcels surrounding two Industrial parcels, an open space area with two small adjacent parking lots, two smaller open space areas, and a small park for recreational users. Therefore, buildout of the proposed Development Area could result in the generation of construction noise leading to an increase in ambient noise levels in the vicinity of the Project site. The operational aspects of the proposed Development Area could result in the increase of ambient noise levels within the Project vicinity. As such, a noise technical study is being prepared to assess potential impacts related increased noise levels due to the proposed Project. Until the noise technical study is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not result in vibration or increased noise levels. However, construction of the proposed Development Area would involve earthwork and ground-disturbing activities that could result in temporary groundborne vibration and noise. A noise technical study is being prepared that will analyze the level of vibration and groundborne noise associated with the construction activities associated with the Development Area. Until the noise technical study is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Potentially Significant Impact. The proposed Project would occur within the March Airport Influence Area Boundary and would therefore be subject to the March ARB/Inland ALUCP. The Project site is located within the C1 Moderate to High Noise Zone and the C2 Moderate Noise Zone as identified in the March ARB/Inland ALUCP and is identified as an area subject to moderate to high noise impacts (Riverside County ALUC 2014). As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not expose people residing or working in the Project area to excessive noise levels. However, buildout of the proposed Development Area could expose employees or visitors to the Development Area to increased noise levels. The nearest residential area is located approximately 300 feet north of the Development Area, which is within Zone D of the March ARB/Inland ALUCP. Zone D is identified as an area subject to a moderate to low noise impact (Riverside County ALUC 2014). A noise technical study is being prepared and will analyze the

potential for workers and residents to be exposed to excessive noise levels as a result of implementing the proposed Project. Until the noise technical study is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

d) Aircraft operations (i.e., aircraft landings and/or takeoffs) at the March Inland Port Airport between 10:00 p.m. and 6:59 a.m. that could expose people within the March Inland Port Airport's vicinity to a significant risk of sleep disturbance due to noise, as based on a single event noise exposure level analysis?

No Impact. The proposed Project includes a Conservation Area and Development Area, neither of which involve aircraft operations. Therefore, no impact would occur, and this impact will not be analyzed in the EIR prepared for the proposed Project.

4.14 Population and Housing

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
XIV	XIV. POPULATION AND HOUSING - Would the project:					
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?					
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?					

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not induce population growth.

The proposed Development Area would not involve development of housing; however, once the Development Area has been built out, operation of the proposed Development Area is anticipated to generate permanent employment opportunities. According to the Southern California Association of Governments Growth Forecast provided in the adopted 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, referred to as Connect SoCal, employment is anticipated to grow from 76,100 in 2016 to 139,600 by 2045 in unincorporated Riverside County (SCAG 2020a). Employment

growth throughout Riverside County, including incorporated cities, is anticipated to grow from 743,000 in 2016 to 1,103,000 by 2045 (SCAG 2020b).

The number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. The Conservation Area does not contain housing and therefore will not result in the displacement of existing people or housing. Buildout of the Development Area would also not displace existing people or housing because the Development Area does not contain existing housing. No impact would occur, and this issue will not be further evaluated in the EIR prepared for the proposed Project.

4.15 Public Services

Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:							
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	e physical impact e physical impact d for new or phy environmental imance objective	Potentially Significant Impact Impact e physical impacts associated with d for new or physically altered governironmental impacts, in order to the pack of the pa	Potentially Significant Impact With Mitigation Incorporated e physical impacts associated with the provision of for new or physically altered governmental facily environmental impacts, in order to maintain accessmance objectives for any of the public services:				

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

Fire protection?

Potentially Significant Impact. The proposed Project would be served by the Riverside County Fire Department (RCFD). The closest RCFD station to the Project site is Station 11, Orange Crest Fire Station

(19595 Orange Terrace Parkway, Riverside), which is approximately 0.7 miles southwest of the Project site. Additional fire stations serving the Project site include Station 65, in the City of Moreno Valley; Station 1, located in the City of Perris; Station 6, located in the City of Moreno Valley; Station 8, located in Woodcrest in unincorporated Riverside County; and Station 9, located in the City of Riverside.

As part of standard development practices, prior to construction, Project plans would be reviewed by RCFD, and the proposed Development Area would be required to incorporate RCFD's recommendations into the final development plans. RCFD's review and approval of plans would ensure that the proposed Project complies with the California Fire Code (24 CCR, Part 9). The proposed Development Area would be required to install fire safety devices, such as fire alarms and zoned fire sprinkler systems, to improve emergency-related problems for the proposed development. The proposed Project is subject to the payment of a development impact fee related to fire protection. The proposed Project's development impact fee amount for fire protection facility fees is determined based on Ordinance No. JPA 15-01 (March JPA 2015). The payment of these fees would provide funding for capital improvements such as land and equipment purchases, and fire station construction.

The number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses in the proposed Development Area would be similar to the existing development to the east of the Project site, it is unknown whether the Development Area would result in substantial population growth within the RCFD's jurisdiction that would burden existing fire services. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

Police protection?

Potentially Significant Impact. The proposed Project would be served by the Riverside County Sheriff's Department. The closest police station to the Project site is the Riverside County Sheriff's Department (22850 Calle San Juan De Los Lagos, Moreno Valley, California 92553), located approximately 2 miles east of the site. The proposed Project is subject to the payment of a development impact fee for criminal justice public facilities. The proposed Project's development impact fee amount for criminal justice public facility fees is determined based on Ordinance No. JPA 15-01 (March JPA 2015). The payment of these fees would provide funding for capital improvements, such as land and equipment purchases, and criminal justice facility construction.

The number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses associated with the proposed Development Area would be similar to the existing development to the east of the Project site, it is unknown whether buildout of the Development Area would result in substantial population growth that would burden existing police protection services. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

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Schools?

Potentially Significant Impact. Although the proposed Project does not include plans to develop housing, the number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses associated with the proposed Development Area would be similar to the existing development to the east of the Project site, it is unknown whether buildout of the Development Area would result in substantial population growth that would burden existing schools. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

Parks?

Potentially Significant Impact. The proposed Project would involve construction and operation of Industrial, Business, Mixed Use, and Public Facilities, as well as two park areas, with no plans to develop housing. The number of jobs generated by the proposed Development Area is unknown; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses associated with the proposed Development Area would be similar to the existing development to the east of the Project site, it is unknown whether buildout of the Development Area would result in substantial population growth that would burden existing parks. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

Other public facilities?

Potentially Significant Impact. The number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses associated with the proposed Development Area would be similar to the existing development to the east of the Project site, it is unknown whether buildout of the Development Area would result in substantial population growth that would burden other public facilities. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

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4.16 Recreation

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
ΧV	I. RECREATION				
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Potentially Significant Impact. The number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses associated with the proposed Development Area would be similar to the existing development to the east of the Project site, it is unknown whether buildout of the Development Area would result in substantial population growth that would increase the use of existing neighborhood or regional parks or other recreational facilities. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Potentially Significant Impact. The number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses associated with the proposed Development Area would be similar to those in the existing development to the east of the Project site, it is unknown whether buildout of the Development Area would result in substantial population growth that would increase the use of existing neighborhood or regional parks or other recreational facilities.

However, buildout of the proposed Development Area includes the development of three open space areas (a larger open space area and two smaller open space areas) and a small recreation park area. The small recreation park area would be approximately 10.00 acres and would be located directly north of the larger open space area. The small recreation park area would include park amenities such as a playground, picnic area, and exercise stations. The larger open space area would be approximately 50.00 acres and would

consist of trails for recreational users. Two parking small parking areas would be located on the eastern edge of the larger open space area to provide access for park users. The first smaller open space area would be approximately 11.38 acres and would be located directly north of the four Business Park parcels. The second smaller open space area would be 22.47 acres and would be located south of Bunker Hill Drive, between one of the Mixed Use parcels and the two Business Park parcels, as well as along the southern perimeter of the proposed Development Area from Barton Street to Cactus Avenue. The open space parcels would provide a further buffer for the Conservation Area.

In addition, the Project proposes to redesignate 445 acres of land as Open Space consistent with prior determinations made as part of the CBD Settlement Agreement. A General Plan Amendment is currently being prepared to redesignate a portion of the Project site to Open Space to meet the criteria in the CBD Settlement Agreement. In addition, the Conservation Area provides a buffer of at least 300 feet on all sides of the proposed development, with a larger buffer to the south and east. Furthermore, to further protect the Conservation Area, the Project proposes three open space areas, including an additional 30-foot-wide landscaped buffer on the proposed parcels to the north, west, south, and southeast of the development. The CBD Settlement Agreement allows for the Conservation Area to be managed for its wildlife value for sensitive species. The CBD Settlement Agreement also allows for the public to use the recreation area for passive recreation only, as authorized by the March JPA. However, public vehicular access would be prohibited (March JPA 2012).

Although the proposed Project includes a Conservation Area, three open space areas, and a recreational park, the number of jobs generated by the proposed Development Area is unknown at this time; therefore, population growth induced by the proposed Development Area is also currently unknown. Although land uses associated with the proposed Development Area would be similar the development to the east of the Project site, it is unknown whether buildout of the Development Area would result in substantial population growth that would require the construction or expansion of additional recreational areas. Until the number of jobs generated by the proposed Development Area is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

4.17 Transportation

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XV	II. TRANSPORTATION - Would the project:				
a)	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?				
b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			\boxtimes	
d)	Result in inadequate emergency access?			\boxtimes	

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have an adverse effect on the circulation system. However, construction of the proposed Development Area would result in temporary impacts to traffic. Operation of the proposed Development Area would result in increased traffic in the area because new land uses would be added to a site that was previously disturbed and has some existing development. Project-generated traffic is currently unknown, and additional traffic could result in conflicts with programs, plans, ordinances, or policies addressing the circulation system. Traffic impacts will need to be analyzed for consistency with state and regional plans and policies, including the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (SCAG 2020a). Therefore, a traffic impact analysis is being prepared for the proposed Development Area that will identify any potential impacts associated with consistency with applicable programs, plans, and policies regarding transit, roadway, bicycle, and pedestrian facilities. Until the traffic impact analysis is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not conflict with a congestion management program. However, construction of the proposed Development Area would result in temporary impacts to traffic. Operation of the proposed Development Area would result in increased traffic in the area because new traffic-generating land uses would be added to a site that was previously disturbed and has some existing development. Project-generated traffic would also result in increased vehicle miles traveled (VMT). Traffic impacts will need to be analyzed for consistency with CEQA Guidelines Section 15064.3(b) concerning VMT; thus, a VMT analysis is being prepared for the proposed Development Area that will identify any potential conflicts or inconsistencies with the requirements of CEQA Guidelines Section 15064.3. Until the VMT analysis is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not increase hazards due to design features.

Regional access to the Development Area is provided via I-215, with local access provided via Cactus Avenue, Brown Street, and Barton Street. The proposed Development Area includes a roundabout at the intersection of Cactus Avenue and Airman Drive, as well as signage, to deter trucks from accessing Barton Street. The proposed vehicular access point and circulation outside/inside the Development Area, including the proposed parking lots, would be reviewed and approved by March JPA's planning and engineering staff. The Development Area does not include any non-standard design features, nor does it have any hazardous elements. Impacts would be less than significant, and this issue will not be further analyzed in the EIR prepared for the proposed Project.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have an adverse effect on emergency access.

The proposed Development Area consists of previously disturbed land with some existing development. Access to the Development Area would be achieved through the extension of Cactus Avenue, Brown Street, and Barton Street. Access to the Development Area would be designed according to March JPA standards and all applicable emergency access standards. Through March JPA's site plan review, March JPA would ensure that the proposed air freight cargo facility meets code requirements related to emergency access. Impacts would be less than significant, and this issue will not be further analyzed in the EIR prepared for the proposed Project.

4.18 Tribal Cultural Resources

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact	
XVI	III. TRIBAL CULTURAL RESOURCES					
Pul def	Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or					
b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?					

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on a tribal cultural resource.

In accordance with Assembly Bill 52 and Senate Bill 18, agency-to-agency consultation by March JPA would be conducted by sending a formal notice to inform California Native American tribes that have requested such notice of a project application within a geographic area with which the tribe is traditionally and culturally affiliated to identify potential impacts to a tribal cultural resource, as defined in Public Resources Code Section 21074. Input received during consultation with the tribes would be considered throughout the environmental document preparation process. However, because consultation with tribes is currently being initiated, additional information is needed to determine whether the proposed Project could result in

a significant impact to tribal cultural resources. Furthermore, a cultural resources technical study is being prepared that will include the results of a records search and field investigation. Until the information described above has been provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Potentially Significant Impact. In accordance with Assembly Bill 52 and Senate Bill 18, agency-to-agency consultation by March JPA would be conducted by sending a formal notice to inform California Native American tribes that have requested such notice of a project application within a geographic area with which the tribe is traditionally and culturally affiliated to identify potential impacts to a tribal cultural resource, as defined in Public Resources Code Section 21074. Tribal consultation input would be considered throughout the environmental document preparation process. However, because consultation with tribes has not concluded, additional information is needed to determine whether the proposed Project could result in a significant impact. Until consultation has concluded and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be further discussed and analyzed in the EIR prepared for the proposed Project.

4.19 Utilities and Service Systems

XIX	(. UTILITIES AND SERVICE SYSTEMS – Would th	Potentially Significant Impact e project:	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	\boxtimes			
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not require or result in new or expanded utility facilities However, buildout of the proposed Development Area would result in new development on a site that consists of previously disturbed land with some existing development. As such, the proposed Development Area would increase the intensity of uses on the site, resulting in increased use of water, wastewater treatment, electric power, natural gas, and telecommunication systems. Furthermore, the proposed Development Area would result in an increase in impervious areas. An increase in runoff from impervious surface can cause alterations to drainage courses, requiring new or expanded stormwater drainage systems. Additional information is needed to determine how many jobs the Project would generate during operation. However, it is assumed that implementation of the proposed Project would require construction of new water and wastewater connections to connect to WMWD's water and wastewater collection and treatment systems. Buildout of the proposed Development Area includes a WMWD sewer lift station facility along the east side of the Development Area. In addition, due to site topography, wastewater service and connections for the park sites may be served by the City of Riverside. Due to the size of the proposed Development Area and the potential for the Development Area to require water and to generate wastewater in quantities beyond those currently handled by WMWD's or the City of Riverside's service infrastructure, potentially significant impacts could result. Therefore, impacts are considered potentially significant, and this topic, including any applicable mitigation measures, will be further analyzed in the EIR prepared for the proposed Project.

b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Potentially Significant Impact. As discussed in Section 4.19(a), no physical changes are anticipated as part of the conservation easement; however, the proposed Development Area would increase the intensity of uses on the Project site, resulting in increased water use. Buildout of the proposed Development Area would require construction of new water connections to connect to WMWD's water distribution system. Due to the size of the proposed Development Area and the potential for the proposed Development Area to

require water in quantities beyond those currently handled by WMWD's service infrastructure, potentially significant impacts could result. Therefore, impacts are considered potentially significant, and this topic, including any applicable mitigation measures, will be further analyzed in the EIR prepared for the proposed Project.

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Potentially Significant Impact. As discussed in Section 4.19(a), no physical changes are anticipated as part of the conservation easement; however, the proposed Development Area would increase the intensity of uses on the Project site, resulting in increased wastewater generation. As such, buildout of the proposed Development Area would require the construction of new wastewater connections to connect to WMWD's and the City of Riverside's wastewater collection and treatment system. Due to the size of the proposed Development Area and the potential for the proposed Development Area to generate wastewater in quantities beyond those currently handled by WMWD's and the City of Riverside's service infrastructure, potentially significant impacts could result. Therefore, impacts would be potentially significant, and this topic, including any applicable mitigation measures, will be further analyzed in the EIR prepared for the proposed Project.

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not generate solid waste. However, construction of the proposed Development Area would result in the generation of solid waste such as scrap lumber, concrete, residual wastes, packing materials, and plastics. Operation of the proposed Development Area would result in an increase in intensity of uses in the Development Area, which would likely be associated with increased generation of solid waste. Therefore, impacts would be potentially significant, and this topic, including any applicable mitigation measures, will be further analyzed in the EIR prepared for the proposed Project.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Potentially Significant Impact. As discussed in Section 4.19(d), the conservation easement would not generate solid waste; however, buildout of the proposed Development Area would result in the generation of solid waste during construction and operations. Therefore, impacts would be potentially significant, and this topic, and applicable mitigation measures, will be further analyzed in the EIR prepared for the proposed Project.

4.20 Wildfire

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX.	XX. WILDFIRE – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?				
b)	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				
c)	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				
d)	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. March JPA adopted a Disaster Preparedness and Recovery Plan within the Safety/Risk Management Element of the General Plan (March JPA 1999). This plan outlines the implementation programs needed to prevent risks to occupants and to minimize injury from an unavoidable disaster or emergency. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. As no physical changes are anticipated as part of this action, the conservation easement would not have a substantial adverse effect on an emergency response or evacuation plan.

Any potential impacts created by buildout of the proposed Development Area would be less than significant with implementation of the Disaster Preparedness and Recovery Plan programs within the General Plan. Entrances to the Project site would be located along the north, south, and east sides of the Project site. The north and south entrances would be accessed via Barton Street, which would be extended to connect from Alessandro Boulevard to Barton Drive as part of Project construction. The entrance to the east of the Development Area would be located along Cactus Avenue, approximately 1 roadway mile west of the I-215/Cactus Avenue on-/off-ramp. The Development Area would also have an additional access point to

the north via Brown Street which the Project would extend southward to connect from Alessandro Boulevard to the new extension of Cactus Avenue.

An access driveway to the site would be provided on Cactus Avenue and Brown Street. According to the March JPA General Plan's Transportation Element, Cactus Avenue and Brown Street are classified as Major Arterial roadways, which provides access to I-215 to the east. Brown Street connects to Alessandro Boulevard. According to the March JPA General Plan's Transportation Element, Cactus Avenue and Brown Street are classified as Major Arterial roadways, which provide access to I-215 to the east. Brown Street connects to Alessandro Boulevard (Arterial Highway) to the north, which then connects to I-215 to the east (March JPA 1999). The proposed site plan for the Development Area would be reviewed and approved by March JPA, the police department, and the fire department during plan review to ensure that emergency access would be provided at all times. Therefore, implementation of the proposed Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant, and this topic will not be further analyzed in the EIR prepared for the proposed Project.

b) Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Potentially Significant Impact. The proposed Project is located within a High Fire Hazard Severity Zone (HFHSZ) (CAL FIRE 2017). Thus, there is the potential that the proposed Project could exacerbate wildfire risks, exposing Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Until further information is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

c) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Potentially Significant Impact. As part of the Project, the Conservation Area would be placed under a conservation easement to be managed for its wildlife habitat value for sensitive species. At this time, it is unknown whether physical changes, such as fuel breaks, are anticipated as part of this action. Buildout of the proposed Development Area would require the installation or maintenance of new infrastructure such as roads, emergency water sources, power lines, or other utilities that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Additional information is needed to determine whether the proposed Project could exacerbate fire risk. A Specific Plan is currently being prepared for the proposed Project. Until the Specific Plan is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

d) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Potentially Significant Impact. As shown in the County of Riverside General Plan Safety Element, Figure S-11, the Project site is within an HFHSZ (CAL FIRE 2017). In addition, the conservation easement would

not involve any changes to the land. Thus, the proposed Project would have the potential to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes within or near a local or state responsibility area or very high fire hazard severity zone. In addition, the Project site is located within Zone D (areas in which flood hazards are undetermined, but possible) on FEMA Flood Insurance Rate Map 06065C0740G (FEMA 2008), and there may be existing drainage features traversing the site. Until further information is provided and potential mitigation measures are identified, as necessary, impacts are considered potentially significant. Therefore, this topic will be analyzed in the EIR prepared for the proposed Project.

4.21 Mandatory Findings of Significance

		Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX	. MANDATORY FINDINGS OF SIGNIFICANCE	<u>, </u>	,	,	,
a)	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?				
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	\boxtimes			

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As discussed in Section 4.4, Biological Resources, buildout of the proposed Development Area has the potential to impact sensitive vegetation communities and habitat for special-status wildlife. Furthermore, as discussed in Section 4.5, Cultural Resources, buildout of the proposed Development Area could result in potentially significant impacts to cultural resources. A biological technical report is being prepared to identify whether the proposed Development Area would substantially reduce the habitat of wildlife species, cause a wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. A cultural resources report is also being prepared to evaluate whether the proposed Development Area would result in adverse impacts to historic or archaeological resources. Until the information described above has been provided and potential mitigation measures are identified, as necessary, impacts would be considered potentially significant. Therefore, these topics will be analyzed in the EIR prepared for the proposed Project.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Potentially Significant Impact. Buildout of the proposed Development Area has the potential to result in significant impacts that could cause cumulatively considerable impacts when viewed in connection with the effects of past, current, or probable future projects. Until the various studies mentioned in Section 4.21(a) are provided and mitigation measures are identified, as necessary, impacts would be considered potentially significant. Therefore, cumulative impacts will be analyzed in the EIR prepared for the proposed Project.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. As described throughout this document, Project implementation could result in potentially significant adverse effects on human beings. The analysis of the proposed Project's potential for environmental effects that can cause substantial adverse effects on human beings requires additional study; therefore, these impacts would be considered potentially significant until they can be fully analyzed in the EIR.

5 References and Preparers

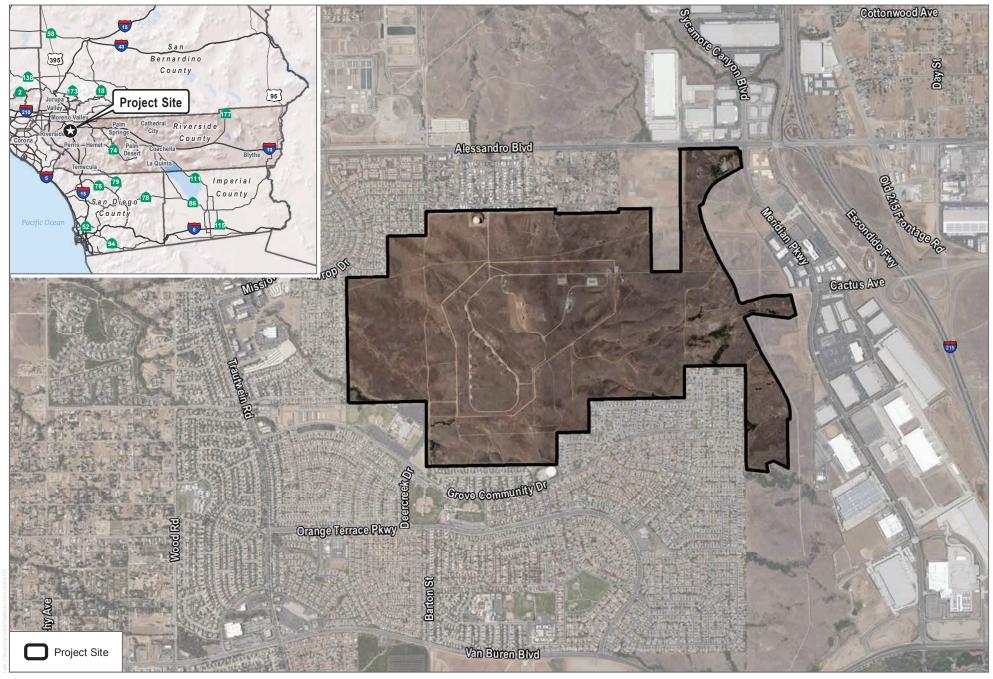
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5.2 List of Preparers

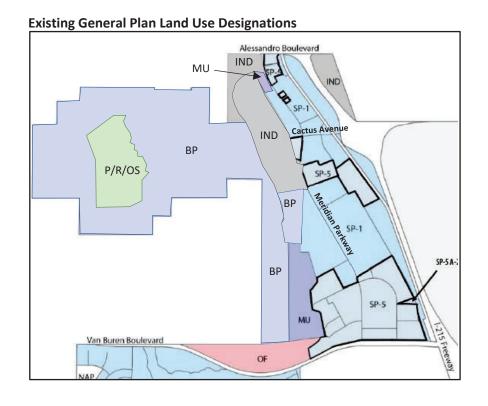
Nicole Cobleigh, Senior Project Manager Wendy Worthey, Project Manager Chelsea Ohanesian, Environmental Analyst Laurel Porter, Senior Technical Editor Scott Graff, Technical Editor Carrie Kubacki, GIS Specialist Felisa Pugay, Publications Specialist

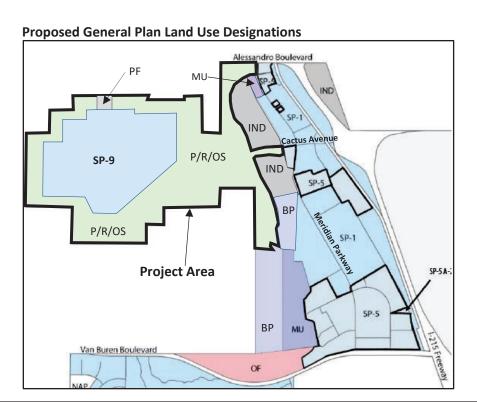


SOURCE: Bing Maps 2020

FIGURE 1
Project Location

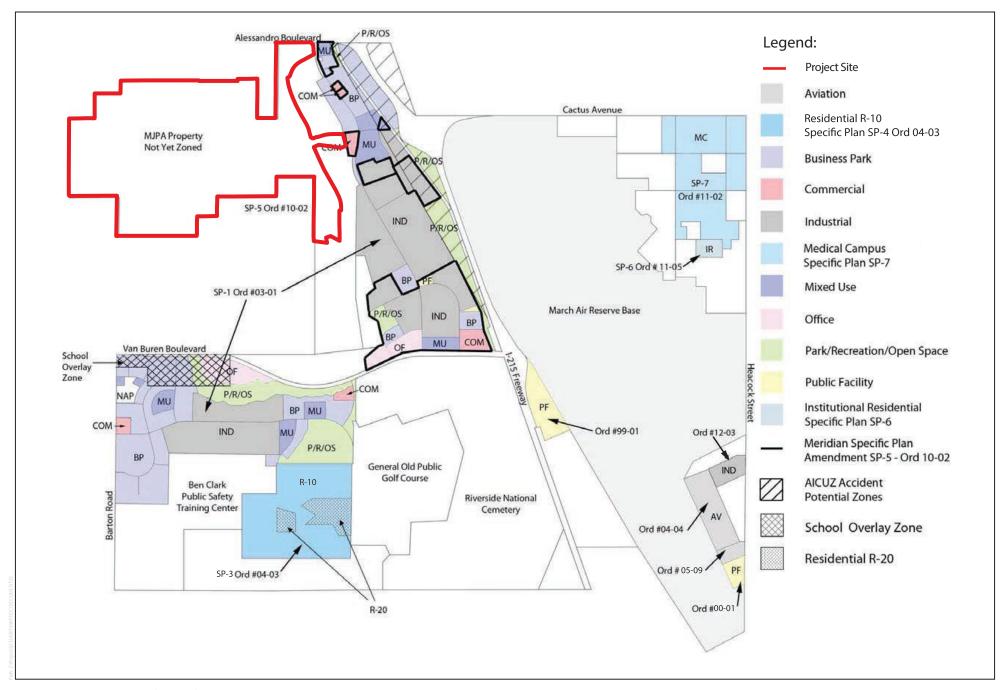
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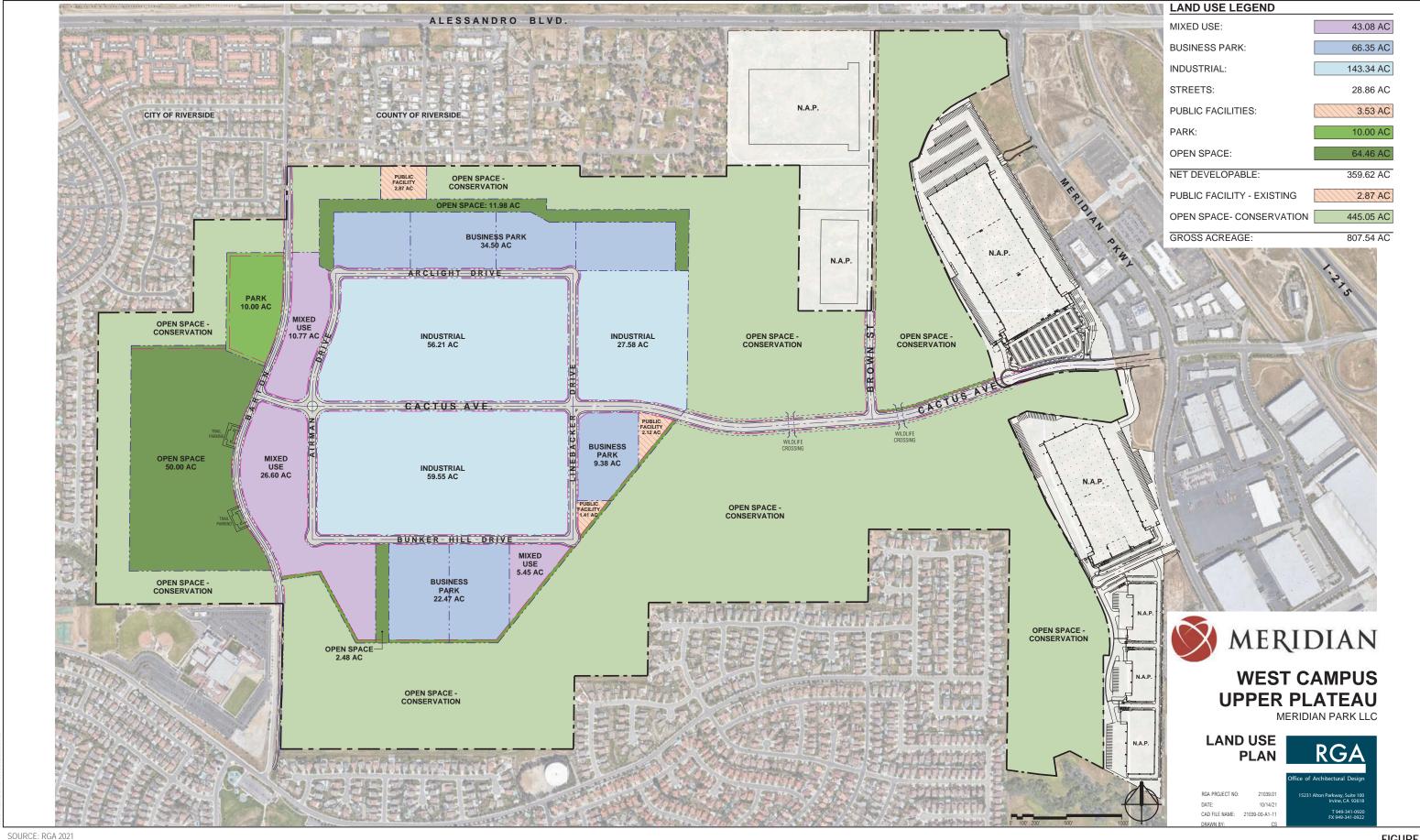
SOURCE: March Joint Powers Authority (2017-10-06)

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SOURCE: March Joint Powers Authority (2014-03-24)

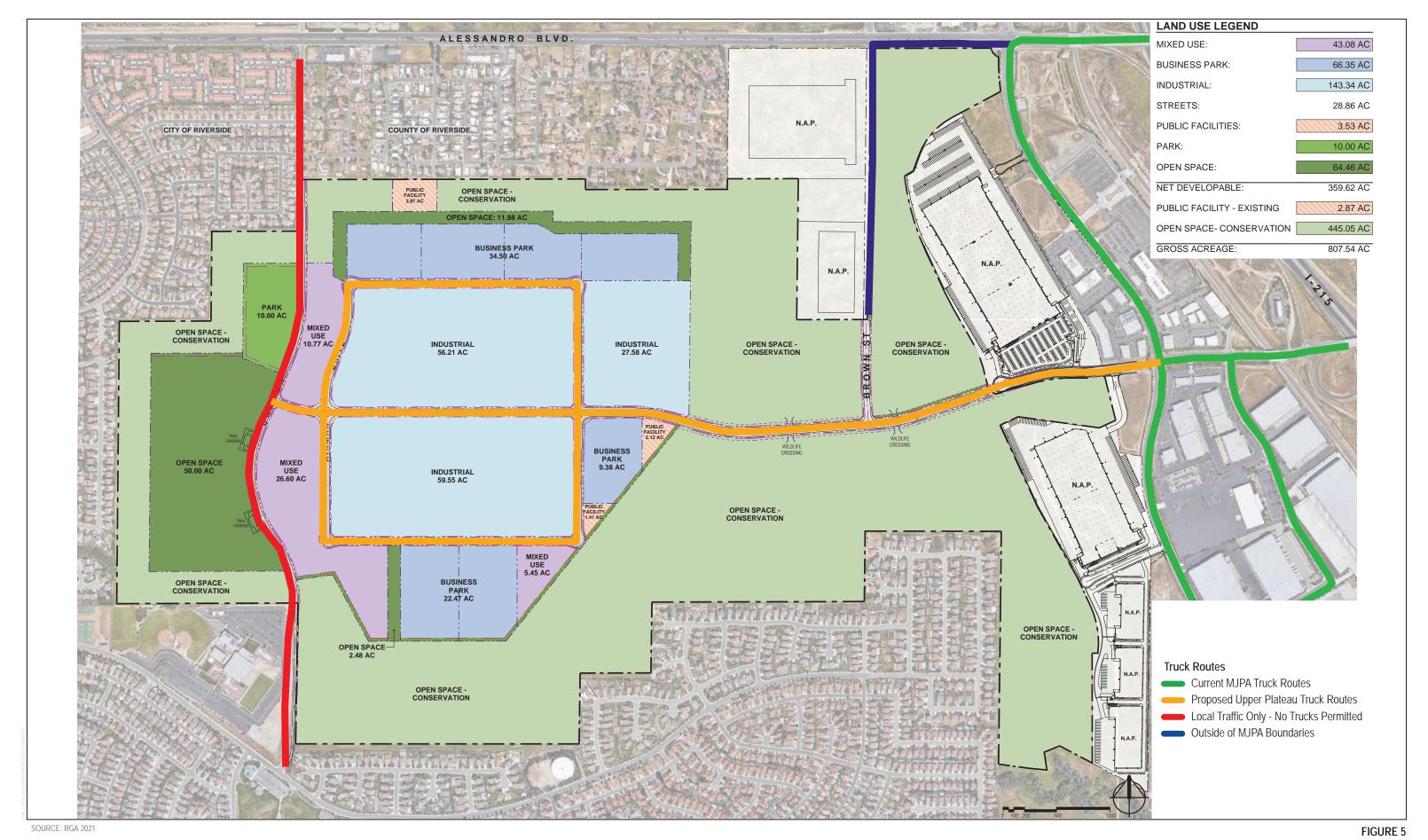
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DUDEK 6 0 500 1,000 Feet

FIGURE 4

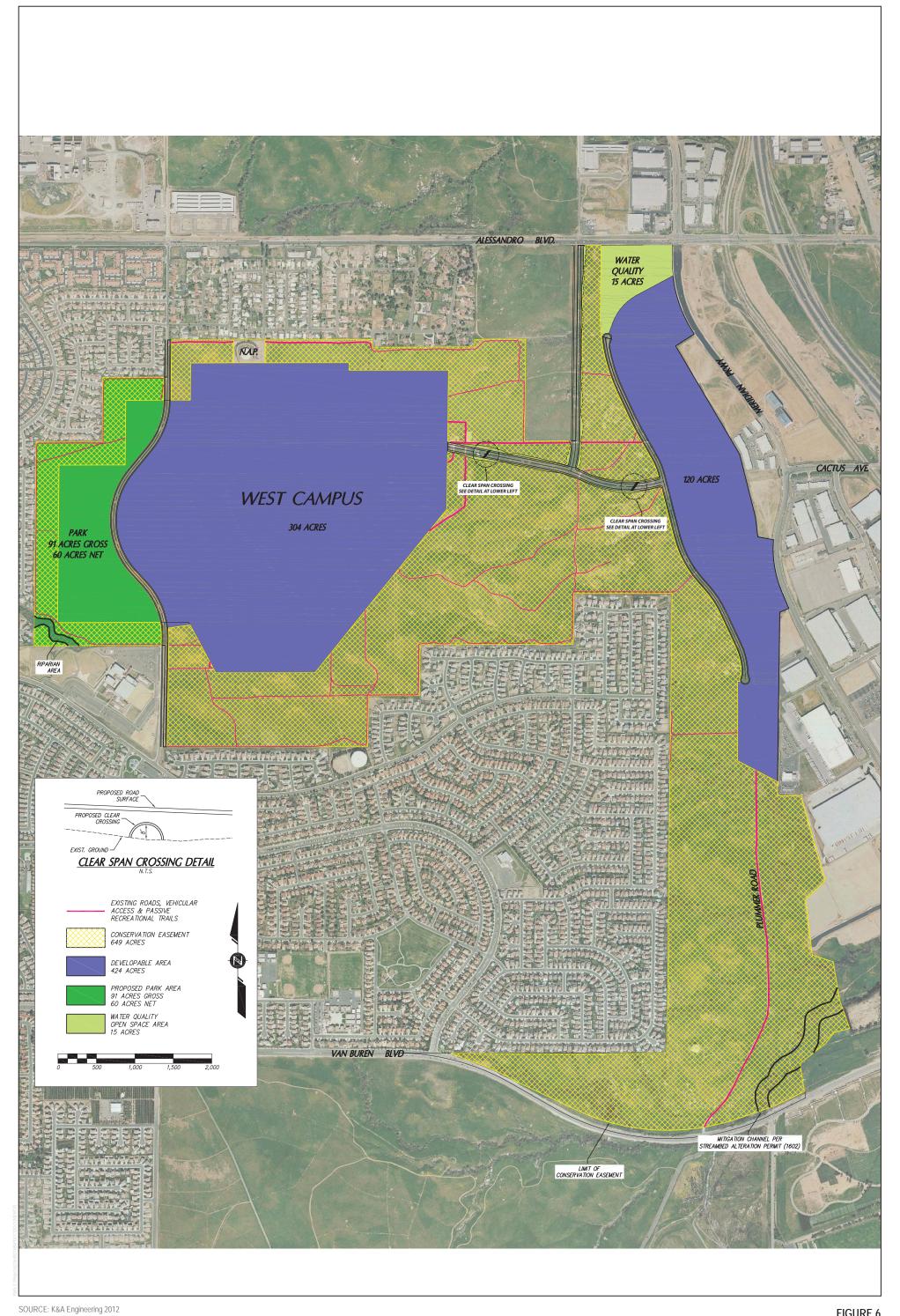
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DUDEK 6 0 500 1,000 Feet

Proposed Truck Routes

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