

**EXHIBIT A**  
**CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING**  
**CONSIDERATIONS**

The California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) (CEQA) requires that public agencies shall not approve or carry out a project for which an environmental impact report has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written Findings for each of those significant effects, accompanied by a brief explanation of the rationale for each Finding (State CEQA Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.], § 15091). This document presents the CEQA Findings of Fact made by March Joint Powers Authority (March JPA), in its capacity as the CEQA lead agency, regarding the Meridian South Campus Specific Plan and Village West Drive Extension Project (Project), evaluated in the Master Environmental Impact Report (MEIR) for the General Plan of the March Joint Powers Authority (September 1999), the March Business Center Specific Plan Focused EIR (2003 Focused EIR), the Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent Environmental Impact Report (Draft SEIR), and the Meridian South Campus Specific Plan and Village West Drive Extension Final Subsequent Environmental Impact Report (Final SEIR). The Draft SEIR and Final SEIR are collectively referred as the “SEIR,” herein.

**SECTION I**  
**INTRODUCTION**

Public Resources Code section 21002 states that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” Section 21002 further states that the procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects.”

Pursuant to section 21081 of the Public Resources Code, a public agency may only approve or carry out a project for which an SEIR has been completed that identifies any significant environmental effects if the agency makes one or more of the following written finding(s) for each of those significant effects accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained

workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

As indicated above, section 21002 requires an agency to “avoid or substantially lessen” significant adverse environmental impacts. Thus, mitigation measures that “substantially lessen” significant environmental impacts, even if not completely avoided, satisfy section 21002’s mandate. (*Laurel Hills Homeowners Assn. v. City Council* (1978) 83 Cal.App.3d 515, 521 [“CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level”]; *Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles* (1986) 177 Cal. App. 3d 300, 309 [“[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible”].)

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives. (Pub. Resources Code, § 21002.1(c) [if “economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency”]; see also State CEQA Guidelines, § 15126.6(a) [an “EIR is not required to consider alternatives which are infeasible”].) CEQA defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Pub. Resources Code, § 21061.1.) The State CEQA Guidelines add “legal” considerations as another indicia of feasibility. (State CEQA Guidelines, § 15364.) Project objectives also inform the determination of “feasibility.” (*Jones v. U.C. Regents* (2010) 183 Cal. App. 4th 818, 828-829.) “[F]easibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) “Broader considerations of policy thus come into play when the decision making body is considering actual feasibility[.]” (*Cal. Native Plant Soc’y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000 (“*Native Plant*”); see also Pub. Resources Code, § 21081(a)(3) [“economic, legal, social, technological, or other considerations” may justify rejecting mitigation and alternatives as infeasible] (emphasis added).)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project’s environmental alternatives is not required; rather, the requirement is that sufficient information be produced “to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” Outside

agencies (including courts) are not to “impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken.” (*Residents Ad Hoc Stadium Com. v. Board of Trustees* (1979) 89 Cal.App.3d 274, 287.)

**SECTION II**  
**FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT REQUIRING**  
**MITIGATION**

The March Joint Powers Authority hereby finds that the following potential environmental impacts of the Project are less than significant and therefore do not require the imposition of Mitigation Measures.

**A. AESTHETICS**

**1. Scenic Resources**

Threshold: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-35; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project area (including the area of the proposed overpass or underpass across the Village West Drive Extension) does not include scenic highways, and none are located in the immediate vicinity. The nearest eligible state scenic highway is a portion of Interstate 215 (I-215) located approximately four miles to the south of the proposed Project area. The City of Riverside now identifies Van Buren Boulevard as a scenic boulevard. Van Buren Boulevard is also recognized by the County of Riverside and the March JPA as a scenic boulevard. Proposed land uses within the Project area would be consistent with other uses along Van Buren Boulevard; and therefore, would not significantly affect these resources (2003 Focused EIR). No on-site rock outcroppings or historic buildings located within the Project area are within a state scenic highway. Accordingly, the Project will have no impact on this resource category. (Draft SEIR, Appendix A, p. 12-35; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**B. AGRICULTURE AND FOREST RESOURCES**

**1. Farmland Conversion**

Threshold: 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?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the area of the proposed overpass or underpass across the Village West Drive Extension) does not contain land under Williamson Act Contract or farmland recognized as prime, unique, statewide or locally important. Further, the site is not utilized for agricultural purposes. Accordingly, the Project will have no impact on this resource category. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **2. Agricultural Zoning**

Threshold: Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the area of the proposed overpass or underpass across the Village West Drive Extension) is not zoned for agricultural use or within a designated Williamson Act contract and instead is zoned for Commercial, Business Park, Mixed Use and Industrial land uses. The land proposed for the Village West Drive extension is currently an unpaved yet drivable roadway from Lemay Drive south to Nandina Avenue, and the land proposed for the proposed overpass or underpass is immediately adjacent to the existing roadway alignment. The proposed Project would not cause a loss in agricultural lands, and therefore, would not adversely impact agricultural resources. Accordingly, the Project will have no impact on this resource category. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **3. Forestland Zoning**

Threshold: 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))?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project area (including the area of the proposed overpass or underpass across the Village West Drive Extension) does contain any forest land, timberland, or land zoned for Timberland Production. The Project site is instead zoned for Commercial, Business Park, Mixed Use and Industrial land uses. The land proposed for the Village West Drive extension is currently an unpaved yet drivable roadway from Lemay Drive south to Nandina Avenue, and the land proposed for the proposed overpass or underpass is immediately adjacent to the existing roadway

alignment. Accordingly, the Project will have no impact on this resource category. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **4. Loss of Forest Land**

Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the area of the proposed overpass or underpass across the Village West Drive Extension) is not zoned or used for forest land and as such, Project implementation would not convert forest land to non-forest use. Accordingly, the Project will have no impact on this resource category. (Draft SEIR, Appendix A, p. 12-38; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **5. Conversion of Farmland or Forestland**

Threshold: 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?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-39; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Neither the Project site (including the area of the proposed overpass or underpass across the Village West Drive Extension) nor the surrounding land uses are in an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Further the site is not utilized for agricultural or forest purposes. Accordingly, the Project will have no impact on this resource category. (Draft SEIR, Appendix A, p. 12-39; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **C. AIR QUALITY**

#### **1. Sensitive Receptors**

Threshold: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant. (Draft SEIR, pp. 4.2-34 through 4.2-44; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The subsections below summarize analysis and conclusions from the SEIR in the category of air quality impacts on sensitive receptors.

*Localized Significance Thresholds Analysis.* Results of a localized significance threshold analysis presented in the SEIR indicate that the Project would not exceed the South Coast Air Quality Management District (SCAQMD) localized significance thresholds during construction or operation. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction or operation, and impacts would be less than significant.

*Carbon Monoxide Hotspots.* Project traffic would not create or result in a carbon monoxide (CO) hot spot. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of the Project. Impacts would be less than significant.

*Health Risk Assessment.* The results of a health risk assessment included in the SEIR indicate that the Project would not result in any significant health risk impacts from Project construction or operation. Thus, impacts to sensitive receptors would be less than significant.

*Health Effects of Criteria Air Pollutants.* The SEIR analysis does not estimate the health effects of criteria pollutants attributable to Project construction because construction emissions, after mitigation, would not exceed any SCAQMD daily or localized thresholds. In addition, construction emissions are short term and the methodologies available to estimate health risks from criteria air pollutants are based on long term exposures. Operation health effects of criteria air pollutants are disclosed in the SEIR for informational purposes only. There are no significance thresholds for health effects, thus this information is provided in the SEIR for background understanding regarding the air quality emissions. (Draft SEIR, pp. 4.2-34 through 4.2-44)

*Proposed Overpass/Underpass.* The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential air quality impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of impacts to air quality would be generated. As such, the analysis determined that the proposed overpass or underpass would not result in new or different air quality effects than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **2. Other Emissions (e.g., odors)**

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

Finding: Less than significant. (Draft SEIR, p. 4.2-44; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Construction odor emissions would be temporary, short-term, and intermittent, and would cease upon completion of construction; thus, the impact would be less than significant. The Project would not contain land uses typically associated with emitting objectionable odors. The proposed Project would also be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Odors associated with proposed Project construction and operations would be less than significant. (Draft SEIR, p. 4.2-44)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential air quality impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of impacts to air quality (including odor emissions) would be generated. As such, the analysis determined that the proposed overpass or underpass would not result in new or different air quality effects than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **D. BIOLOGICAL RESOURCES**

### **1. Special-Status Species**

Threshold: 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?

Finding: Less than significant. (Draft SEIR, pp. 4.3-23 through 4.3-24)

Explanation:

*Smooth tarplant.* Smooth tarplant has a moderate potential to occur. However, no smooth tarplant was found on site during field surveys. The potential loss of smooth tarplant from the South Campus Specific Plan Project site has already been accounted for through upland habitat mitigation completed as part of the March Air Base closure process. Potential impacts on smooth tarplant, if present on the South Campus Specific Plan Project site, would be less than significant due to the preservation of suitable habitat for the species. Regarding impacts from the Village West Drive Extension, the loss of any individuals of the species due to construction of the Village West Drive Extension Project is not expected to cause regional declines in the species and would not conflict with the goals of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) in regards to the species, although the March JPA is not a participant under the MSHCP. Potential impacts on smooth tarplant, if present within the Village West Drive Extension,



would be less than significant.

*Coastal whiptail, loggerhead shrike, red diamond rattlesnake, and San Diego black-tailed jackrabbit.* Four additional California Species of Special Concern, coastal whiptail, loggerhead shrike, red diamond rattlesnake, and San Diego black-tailed jackrabbit, have a moderate potential for occurrence based on suitable habitat or observation during surveys. Additionally, two Watch List wildlife species, California horned lark and orange-throated whiptail, have a moderate potential for occurrence based on the presence of suitable habitat. Impacts to these species are described below:

- Coastal whiptail, orange-throated whiptail, and black-tailed jackrabbit are highly mobile species and it would be expected that most individuals would naturally leave the area during the commencement of Project activities and impacts to these species would thus be less than significant.
- Red diamond rattlesnake are typically found associated with chaparral, coastal sage scrub, along creek banks, and in rock outcrops or piles of debris. The loss of 0.11 acres of buckwheat scrub that is potentially suitable for the species within the South Campus Specific Plan Project site is not expected to impact the regional population of the species. Impacts from the Village West Drive Extension Project are proposed in developed/ornamental, disturbed, non-native grassland/paniculate tarplant, and ruderal areas that are only marginally suitable for red diamond rattlesnake, and the species is not likely to be encountered during construction. For these reasons, the Project's impacts to red diamond rattlesnake would be less than significant. (Draft SEIR, pp. 4.3-23 through 4.3-24)

## 2. Riparian Habitat / Sensitive Natural Communities

Threshold: 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?

Finding: Less than significant. (Draft SEIR, pp. 4.3-27 and 4.3-28; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Several vegetation communities have been identified within the near the Project site. These communities and the Project's potential effects to the communities are summarized as follows:

*Buckwheat scrub.* Buckwheat scrub (*Eriogonum fasciculatum* shrubland alliance) is a native habitat that is present within the South Campus

Specific Plan site. Buckwheat scrub habitat is given a Global and State rank of G5 and S5, respectively, meaning it is “demonstrably secure because of its worldwide/ statewide abundance.” As such, it is not a rare habitat for which impacts would be significant. Further, impacts on buckwheat scrub are extremely small (0.11 acres) and impacts on upland habitats within the Project site were addressed under previous EIR documentation. As such, impacts on buckwheat scrub are less than significant.

*Non-Native Grassland.* The South Campus Specific Plan site also contains 15.36 acres of non-native grassland, which would be lost as a result of the Project. This would not be considered a significant loss locally or regionally. Further, impacts on upland habitats within the Project site were addressed under the previous EIR documentation (SCH 2002071089). As part of the March Air Base realignment and subsequent negotiations, 664 acres of native habitat were set aside for conservation in consideration of development within the March Air Base re-use area. These conservation areas include upland habitats similar to those that occur on site. As such, impacts on upland habitats are considered adequately mitigated under previous agency consultation and are less than significant.

*Riversidean Sage Scrub (Disturbed).* Riversidean Sage Scrub (Disturbed) (*Eriogonum fasciculatum* shrubland alliance) is a native habitat that is located near the Village West Drive Extension Project site and within the area of the proposed overpass or underpass across the roadway alignment. This habitat is located outside of the Village West Drive Extension Project site footprint and would not be impacted by the roadway extension. Impacts to this habitat resulting from the proposed overpass or underpass would not be significant because the habitat is disturbed, impacts are minor (approximately 0.1 acre), and impacts on upland habitats within the Project site have been addressed under previous EIR documentation (SCH 2002071089). As stated above, as part of the March Air Base realignment and subsequent negotiations, 664 acres of native habitat were set aside for conservation in consideration of development within the March Air Base re-use area. These conservation areas include similar upland habitats. As such, impacts are less than significant.

*Non-native grassland/paniculate tarplant.* Development of the Village West Drive Extension and the associated proposed overpass or underpass would result in the loss of 2.39 acres of non-native grassland/paniculate tarplant. However, this would not be considered a significant loss locally or regionally. Impacts would be less than significant. (Draft SEIR, pp. 4.3-27 and 4.3-28; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **3. Wetlands**

Threshold: 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?

Finding: Less than significant. (Draft SEIR, pp. 4.3-27 through 4.3-28)

Explanation:

#### **South Campus Specific Plan**

The proposed Project would occur primarily on previously disturbed and developed land. The one native habitat present within the Project site is buckwheat scrub (*Eriogonum fasciculatum* shrubland alliance).

Buckwheat scrub habitat is identified as G5 and S5, meaning it is “demonstrably secure because of its worldwide/ statewide abundance” (CNPS 2019). As such, it is not a rare habitat for which impacts would be significant. Further, impacts on buckwheat scrub are extremely small (0.11 acres) and impacts on upland habitats within the Project site were addressed under previous EIR documentation (SCH 2002071089). Impacts on this habitat would be less than significant. The loss of 15.36 acres of non-native grassland would not be a significant loss of this habitat locally or regionally. Further, impacts on upland habitats within the Project site were addressed under the previous EIR documentation (SCH 2002071089). As part of the March Air Base realignment and subsequent negotiations, 664 acres of native habitat were set aside for conservation in consideration of development within the March Air Base re-use area. These conservation areas include upland habitats similar to those that occur on site. As such, impacts on upland habitats are considered adequately mitigated under previous agency consultation and are less than significant. (Draft SEIR, pp. 4.3-27 through 4.3-28)

#### **4. Wildlife Corridors**

Threshold: 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?

Finding: Less than significant. (Draft SEIR, p. 4.3-29; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The South Campus Specific Plan area is surrounded in all directions by developed land and does not serve as a wildlife corridor. The proposed Village West Drive Extension and the associated proposed overpass or underpass is located adjacent to both developed and open space areas, but the majority of the vicinity is developed. Wildlife may move through the area on a local level, but the site does not provide regional habitat

connectivity between large open space areas. Therefore, the Project would not impact wildlife corridors. Impacts would be less than significant. (Draft SEIR, p. 4.3-29; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **5. Local Policies Protecting Biological Resources**

Threshold: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Finding: Less than significant. (Draft SEIR, p. 4.3-31)

Explanation:

### **Village West Drive Extension Project**

No native oaks occur within the Village West Drive Extension Project BSA; therefore, no impacts to oaks that are protected under the Riverside County Oak Tree Management Guidelines would occur with Project implementation. The Village West Drive Extension Project site elevation is below 5,000 acres; as such, Riverside County Ordinance No. 559 is not applicable, and no impacts to trees protected under this ordinance would occur with Project implementation. (Draft SEIR, p. 4.3-31)

## **E. CULTURAL RESOURCES**

### **1. Historical Resources**

Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines, section 15064.5?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-44; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: No historical cultural resources are present within the March Business Center Specific Plan area or within the area that would be affected by the Village West Drive extension, including the proposed overpass or underpass. Accordingly, the Project will have no impact on this resource category. (Draft SEIR, Appendix A, p. 12-44; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **F. ENERGY**

### **1. Energy Consumption**

Threshold: Would the Project result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Finding: Less than significant. (Draft SEIR, pp. 4.4-10 through 4.4-15; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Construction use of electricity and natural gas would be substantially less than that required for Project operation, and would have a negligible contribution to the Project's overall energy consumption. Construction use of petroleum would be temporary and relatively minimal, and would not be wasteful or inefficient. Given these considerations, petroleum consumption associated with the Project would not be considered inefficient or wasteful. Overall, impacts would be less than significant. (Draft SEIR, pp. 4.4-10 through 4.4-15)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential energy impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of impacts to energy would be generated. As such, the analysis determined that the proposed overpass or underpass would not result in new or different energy effects than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **2. Renewable Energy/Energy Efficiency Plans**

Threshold: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Finding: Less than significant. (Draft SEIR, pp. 4.4-15 and 4.4-16; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project would comply with state regulations for energy efficiency. Furthermore, Project design features, compliance with state and local regulations, and mitigation measures applied in the category of greenhouse gas emissions would further reduce the Project's energy impacts. Therefore, impacts would be less than significant. (Draft SEIR, pp. 4.4-15 and 4.4-16)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential energy impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of impacts to energy would be generated. As such, the analysis determined that the proposed overpass or underpass would not result in new or different energy effects than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **G. GEOLOGY AND SOILS**

## 1. **Fault Rupture**

Threshold: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving 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.

Finding: No impact. (Draft SEIR, Appendix A, p. 12-47; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: According to the most recent Alquist-Priolo Earthquake Fault Zoning Map, the Project area (including the proposed overpass or underpass across the Village West Drive Extension) is not located within a fault zone. The nearest fault zone, the San Jacinto fault zone, is located approximately 9 miles east. No impact would occur. (Draft SEIR, Appendix A, p. 12-47; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## 2. **Seismic Ground Shaking**

Threshold: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Finding: Less than significant. (Draft SEIR, Appendix A, p. 12-47; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: To minimize damage from seismic events, the proposed structures (including structures associated with the proposed overpass or underpass across the Village West Drive Extension) would be designed and constructed in accordance with applicable standards in the California Building Code, including pertinent seismic design criteria. Thus, the proposed structures are expected to withstand ground shaking and related hazards at acceptable levels. Impacts would be less than significant. (Draft SEIR, Appendix A, p. 12-47; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## 3. **Seismic-Related Ground Failure, including Liquefaction**

Threshold: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Finding: Less than significant. (Draft SEIR, Appendix A, pp. 12-47 and 12-48; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The potential for liquefaction and seismically induced dynamic

settlements of soils is low within the Project area. To minimize damage from seismic events, the proposed structures (including structures associated with the proposed overpass or underpass across the Village West Drive Extension) would be designed and constructed in accordance with applicable standards in the California Building Code, including pertinent seismic design criteria. Thus, the proposed structures are expected to withstand ground shaking and related hazards at acceptable levels. Impacts would be less than significant. (Draft SEIR, Appendix A, pp. 12-47 and 12-48; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### 4. Geologic Instability

Threshold: 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?

Finding: Less than significant. (Draft SEIR, pp. 4.5-11 through 4.5-12)

Explanation:

##### **Village West Drive Extension**

Landslides/Slope Instability. Neither CGS nor the March JPA or the County of Riverside has evaluated the seismically induced landslide potential within or near the Village West Drive Extension. In addition, the site-specific geotechnical evaluation of the Village West Drive Extension (Appendix F3) did not evaluate landslide potential within the Project area. However, the Village West Drive Extension is composed of low rolling hills with undulating topography and is not located near any steep or unstable slopes. In addition, the Village West Drive Extension would only involve improvements to an existing road, and no substantial cut or fill slopes would be created. Therefore, the proposed Project would not directly or indirectly cause potential adverse effects involving landslides and no impacts would occur.

Liquefaction/Lateral Spreading. According to the County of Riverside General Plan Safety Element, Figure S-3, Generalized Liquefaction, the Village West Drive Extension is not located within an area susceptible to liquefaction. Moreover, the Village West Drive Extension would be built in accordance with the recommendations of a Project-specific geotechnical report (Appendix F3). These recommendations include over-excavation of incompetent materials, compaction of soils, and pavement design specifications designed to resist changes in loads and pressure. Furthermore, the development of the proposed Project would not directly or indirectly cause or exacerbate adverse effects involving liquefaction and lateral spreading. As a result, potential impacts associated with

liquefaction/lateral spreading would be less than significant, and no mitigation is required.

Subsidence According to the USGS Areas of Land Subsidence in California Map, as well as the County of Riverside General Plan Figure S-7, Documented Subsidence Areas, there have been no recorded instances of subsidence within the Village West Drive Extension area associated with groundwater pumping, peat loss, or oil extraction. Therefore, potential impacts associated with subsidence would be less than significant, and no mitigation is required. Collapsible Soils The near-surface soils underlying the Village West Drive Extension consist of topsoil/colluvium, alluvium, and granitic bedrock/Val Verde tonalite. Artificial fill was not encountered during the geotechnical investigation but is expected to be locally present on site. The topsoil/colluvium and alluvium are generally composed of medium dense to dense silty to clayey sand. The geotechnical analysis concluded that both soil and geologic conditions were suitable for Project development, with implementation of Project-specific recommendations, including the removal of all existing paved areas, over-excavation of compressible soils, compaction of fill materials, and pavement specifications based on soil testings (Appendix F3). Furthermore, construction of Village West Drive Extension would not directly or indirectly cause or exacerbate adverse effects involving collapsible soils. Therefore, impacts associated with collapsible soils would be less than significant, and no mitigation is required. (Draft SEIR, pp. 4.5-11 through 4.5-12)

## 5. Expansive Soils

Threshold: 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?

Finding: Less than significant. (Draft SEIR, Appendix A, p. 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The general locations of the proposed Project components are in the same locations identified for development in the originally approved South Campus of the March Business Center Specific Plan, which is an area not identified to contain expansive soils. As such, no new or different expansive soil impacts would occur than those previously identified in past environmental documents prepared for the March Business Center Specific Plan. Thus, impacts related to soil expansion hazards are expected to remain less than significant. (Draft SEIR, Appendix A, p. 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## 6. Septic Tanks

Threshold: 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?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project does not include the use of septic tanks. No impact would occur. (Draft SEIR, Appendix A, p. 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **H. HAZARDS AND HAZARDOUS MATERIALS**

### **1. Hazardous Materials Sites**

Threshold: 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?

Finding: Less than significant. (Draft SEIR, p. 4.7-5; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The entire South Campus Specific Plan area was evaluated for potential environmental hazards in 1994 as part of a Basewide Environmental Baseline Survey, and in 2006, the Air Force Real Property Agency issued a Finding of Suitability to Transfer, certifying that any and all required cleanup and remediation activities for land being disposed of by the March Air Force Base was completed. This evaluation and land transaction included the South Campus Specific Plan area. To date, the entire South Campus Specific Plan area has been graded, and several roadways, buildings, as well as a park with trails, have been constructed. Based on the completion of remediation activities on the site, and that the South Campus Specific Plan area is not located on a listed hazardous materials site compiled pursuant to Government Code Section 65962.5, no new or different impacts would occur than those previously identified in past environmental documents prepared for the March Business Center Specific Plan. Impact would be less than significant. The Village West Drive Extension area, as well as the site of the proposed overpass or underpass, is not identified on a listed hazardous materials site compiled pursuant to Government Code Section 65962.5. Impacts would be less than significant. (Draft SEIR, p. 4.7-5; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **2. Emergency Response and Evacuation Plans**

Threshold: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-53; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: In 2008, the March JPA adopted the March Area Emergency Resource Guide. The proposed Project is consistent with the March Area Emergency Resource Guide because the Project's construction or operations would not result in a physical interference with emergency routes. During construction of the proposed Project, no lane closures are anticipated. As such, adequate emergency access during construction and operation of the proposed Project would be maintained, and the Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Additionally, with improvements to Village West Drive, a through connection between Nandina Avenue to the south and Van Buren Boulevard to the north would be created thereby improving overall emergency access in the vicinity of the Project site. The proposed overpass or underpass across the Village West Drive Extension would provide additional connectivity within the National Cemetery. No impact would occur. (Draft SEIR, Appendix A, p. 12-53; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **3. Wildland Fires**

Threshold: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Finding: Less than significant. (Draft SEIR, Appendix A, p. 12-53; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the proposed overpass or underpass across the Village West Drive Extension) is not within a designated fire hazard area. Additionally, the Project site is surrounded by development to the north, west, and south. Therefore, the risk of a large, high-intensity wildland fire impacting the site is low. Impacts would be less than significant. (Draft SEIR, Appendix A, p. 12-53; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **I. HYDROLOGY AND WATER QUALITY**

### **1. Water Quality Standards**

Threshold: Would the Project violate any water quality standards or waste discharge requirements?

Finding: Less than significant. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

Explanation: Regarding the Village West Drive Extension and the proposed overpass or underpass, compliance with existing regulations would prevent violation

of water quality standards and minimize the potential for contributing sources of polluted runoff during construction. During operation, the proposed roadway would divert stormwater to flow along the paved roadway and into either the existing or new gutters and storm drain culverts, rather than into the neighboring properties, resulting in beneficial impacts. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

## 2. Groundwater Supply

Threshold: 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?

Finding: Less than significant. (Draft SEIR, p. 4.8-24 through 4.8-25; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: *Groundwater Supply.* The water purveyor for the Project site (Western Municipal Water District) obtains a portion of its supply from local groundwater. Based on a Project-specific Water Supply Assessment, the Western Municipal Water District determined that the total projected water supplies available to the Western Municipal Water District during normal, single-dry, and multiple-dry years throughout the next 20-year period are sufficient to meet the projected water demands of the proposed Project, in addition to Western Municipal Water District's existing and planned future uses. Furthermore, the Western Municipal Water District has planned projects aimed at meeting increased future water demands within its service area. These plans include increasing groundwater recharge capabilities, increasing the use of groundwater banking programs, increasing the use of desalinated water, and conjunctive use programs designed to increase regional water reliability. When coupled with regional groundwater management plans and the regulatory bindings of the basins, these projects would ensure that the proposed Project, as well as future regional projects, would not substantially decrease groundwater supplies or impede sustainable management of the relevant groundwater basins. For these reasons, impacts from the proposed South Campus Specific Plan component related to groundwater supply would be less than significant. Regarding the Village West Drive Extension and the proposed overpass or underpass, water would be required for dust control and soil compaction during grading; however, the amount of water required for this 0.82-mile road extension and the overpass/underpass would be inconsequential with respect to water supplies provided by the Western Municipal Water District. Once constructed, no water would be required during operations as no landscaping is proposed. As a result, the Village West Drive Extension and the proposed overpass or underpass would have a less than significant impact on the groundwater supply. (Draft SEIR, pp. 4.8-19 through 4.8-23; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### 3. Erosion or Siltation

Threshold: 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 result in substantial erosion or siltation on- or off-site?

Finding: Less than significant. (Draft SEIR, pp. 4.8-27 through 4.8-28)

Explanation:

#### **Village West Drive Extension**

Currently, the Village West Drive Extension corridor includes a narrow unpaved road and runoff flows onto adjacent unpaved areas. Implementation of the Village West Drive Extension would involve rough grading and widening of the new roadway, and the construction of new curb, gutter, and storm drain culverts (Appendix F3). A SWPPP will be implemented for construction-phase control of erosion and construction-related pollutants. Once constructed, the proposed roadway would divert stormwater runoff from the adjacent undeveloped area to the west beneath the roadway through several storm drain culverts. Stormwater runoff within the roadway would flow along the paved roadway and into either the existing or new gutters and storm drain culverts, rather than into the neighboring properties, resulting in beneficial impacts, with respect to potential erosion of adjacent soils during high intensity rain events. (Draft SEIR, pp. 4.8-27 through 4.8-28)

### 4. On-Site of Off-Site Flooding

Threshold: 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

Finding: Less than significant. (Draft SEIR, p. 4.8-28)

Explanation:

#### **Village West Drive Extension**

The Village West Drive Extension corridor includes an unpaved road and runoff flows onto adjacent unpaved areas. Implementation of the Village West Drive Extension would involve rough grading and widening of the new roadway, and the construction of new curb, gutter, and storm drain culverts (Appendix F3). Once constructed, the proposed roadway would divert stormwater runoff from the adjacent undeveloped area to the west beneath the roadway through several storm drain culverts. Stormwater

runoff within the roadway would divert stormwater to flow along the paved roadway and into new gutters and storm drain culverts, rather than into the neighboring properties, resulting in beneficial impacts with respect to potential flooding during high intensity rain events. (Draft SEIR, p. 4.8-28) Impacts would be less than significant.

## 5. **Impede or Redirect Flood Flows**

Threshold: 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 create or contribute runoff water which would impede or redirect flood flows?

Finding: Less than significant. (Draft SEIR, p. 4.8-29)

Explanation:

### **Village West Drive Extension**

Similar to the South Campus Specific Plan area, the proposed road extension is not located in a floodplain and the risk of flooding on-site would be very low. As a result, proposed Village West Drive extension would not impede or redirect flood flows. Impacts would be less than significant, and no mitigation is required. (Draft SEIR, p. 4.8-29)

## 6. **Inundation**

Threshold: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?

Finding: Less than significant. (Draft SEIR, p. 4.8-30)

Explanation:

### **Village West Drive Extension**

Similar to the South Campus Specific Plan area, the proposed road extension is not located in a floodplain and the risk of flooding on-site would be very low. As a result, proposed Village West Drive Extension would not result in a risk of release of pollutants due to flooding. Impacts would be less than significant, and no mitigation is required. (Draft SEIR, p. 4.8-30)

## J. **LAND USE AND PLANNING**

### 1. **Established Communities**

Threshold: Would the Project physically divide an established community?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-58; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project area is surrounded by Industrial, Business Park, Mixed Use, Cemetery, and Park/Open Space uses, as well as Residential uses to the north. The site has already been approved, through the adoption of the South Campus Specific Plan, for development of Commercial, Industrial, Business Park and Mixed-Use, and currently the site has public access and existing roadways, trails, or other means of travel. Additionally, the proposed improvements to and extension of Village West Drive would occur on an alignment that currently exists. With implementation of the proposed improvements, Village West Drive would pave an existing unpaved road that is frequently used to provide a connection between Van Buren Boulevard and Nandina Avenue and thus will not create a physical division between uses to the south and to the north. The proposed overpass or underpass would provide connections between the existing National Cemetery and the planned future expansion of the National Cemetery to the west. Therefore, the proposed Project would not result in the physical division of an established community and would instead provide an improved through connection where one does not currently exist, as well as a connection within the National Cemetery. No impact would occur. (Draft SEIR, Appendix A, p. 12-58; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **2. Land Use Plan Consistency**

Threshold: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less than significant. (Draft SEIR, pp. 4.9-21 through 4.9-22)

Explanation:

March JPA Development Code. The proposed Project would include a shift in land use acreages within the South Campus. Existing zoning designations within South Campus include Industrial, Business Park, Commercial, Mixed Use, Park/Recreation/Open Space, and Office. No existing zoning designations would be deleted, and one new zoning designation, Public Facilities, would be introduced within South Campus in order to assign this land use designation to a parcel on which an existing electrical substation is located. Acreages within each of the pre-existing zoning designations would change as a result of the proposed Project, and 0.9 acres of Public Facilities would be added to the parcel containing the existing substation within the South Campus. The proposed Project would not create or introduce land use designations not previously identified and evaluated in the 1999 March JPA General Plan or the 2003 Meridian

Business Center Specific Plan and accompanying 2003 Focused EIR. All development within the Project site would be designed in compliance with the requirements of the March JPA Development Code. The Focused EIR evaluated whether the 2003 Approved South Campus would result in significant land use impacts, and through the analysis determined that with implementation of mitigation measures A-1 through A-4 (see Section 4.9.5, Mitigation Measures, for a listing of these measures), impacts would be less than significant. As with the 2003 Approved South Campus, the proposed Project would be consistent with the March JPA Development Code, and impacts would be less than significant.

Riverside County Airport Land Use Compatibility Plan. The proposed Project is located in the C2 Flight Corridor Zone as well as D Flight Corridor Buffer for the March Air Reserve Base as shown on Figure 4.9-2. The C2 Zone is subject to moderate noise impacts, while the D Zone is subject to moderate to low noise impacts. Zone C2 allows single-acre land use intensities up to 500 people, and an average land use intensity of 20 people per acre. Zone D has no restrictions for land use intensities. Development of outdoor noise-sensitive land uses and flight hazards are prohibited within Zones C2 and D, and development of children's schools is discouraged. Airspace review is required for objects greater than 70 feet tall. The proposed Project has undergone ALUC review, and on June 11, 2020, was deemed to be consistent with the 2014 March Air Reserve Base/Inland Port ALUCP. Therefore, the proposed Project would not conflict with the Riverside County ALUCP, and impacts would be less than significant.

Village West Drive Extension. Improved portions of Village West Drive, terminating at Lemay Drive to the south, are built out to the ultimate cross section width, according to March JPA General Plan. The proposed Project would include the extension of Village West Drive from Lemay Drive at the north to Nandina Avenue to the south. Removal of an existing abandoned water tank within the roadway alignment is also required. The proposed extension would improve approximately 4,330 linear feet of the roadway to its ultimate cross-section as a Minor Arterial. The extension would require an easement from the U.S. Department of Veterans Affairs, as well as an amendment to the Transportation Element of the March JPA General Plan. Therefore, implementation of the proposed Village West Drive Extension would be consistent with the roadway classification established by the March JPA General Plan, and impacts would be less than significant. (Draft SEIR, pp. 4.9-21 through 4.9-22)

## **K. MINERAL RESOURCES**

### **1. Regional and Statewide Mineral Resources**

Threshold: 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?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-59; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the area of the proposed overpass or underpass across the Village West Drive Extension) is not known to contain significant mineral resources. No impact would occur. (Draft SEIR, Appendix A, p. 12-59; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **2. Locally Important Mineral Resource**

Threshold: 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?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-59; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the area of the proposed overpass or underpass across the Village West Drive Extension) is not located within a known mineral resources area. No impact would occur. (Draft SEIR, Appendix A, p. 12-59; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **L. NOISE**

### **1. Vibration**

Threshold: Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less than significant. (Draft SEIR, pp. 4.10-68 through 4.10-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Anticipated construction vibration levels were quantified and were determined to be below County of Riverside vibration standards. As such, construction vibration would be less than significant. Similarly, operational vibration associated with the Project is expected to fall below County of Riverside standards. As such, operational vibration would be less than significant. (Draft SEIR, pp. 4.10-68 through 4.10-70)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential noise impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of impacts to noise would be generated. As such, the analysis determined that the proposed overpass or underpass would not result in new or different noise impacts than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)



## 2. Airport Noise

Threshold: Would the 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, expose people residing or working in the project area to excessive noise levels?

Finding: Less than significant. (Draft SEIR, p. 4.10-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The closest airport to the Project site is the March Air Reserve Base/Inland Port Airport (ARB/IPA), which is located approximately 1 mile east of the most eastern portion of the Project site. The Project would be considered a normally acceptable land use since it is located outside of the 60 A-weighted decibels sound equivalent level (dBA) community noise equivalent level (CNEL) contour. Moreover, the March ARB/IPA Land Use Compatibility Plan indicates that no uses are prohibited in this area except for highly noise-sensitive outdoor nonresidential uses (e.g., sports stadiums, concert halls), and therefore, impacts would be less than significant. (Draft SEIR, p. 4.10-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## 3. Nighttime Aircraft Noise

Threshold: Would the Project result in 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?

Finding: No impact. (Draft SEIR, p. 4.10-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project would not result in aircraft operations at the March Inland Port Airport. The proposed Project would involve amending the South Campus Specific Plan to shift the mix of uses, extending Village West Drive, and the construction of the proposed overpass or underpass across Village West Drive. The proposed Project also includes Plot Plan approvals for five components of the South Campus, buildout none of which result in aircraft operations. As such, no impacts to aircraft operations would occur with implementation of the proposed Project. (Draft SEIR, p. 4.10-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## M. POPULATION AND HOUSING

### 1. Population Growth

Threshold: 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)?

Finding: Less than significant. (Draft SEIR, Appendix A, pp. 12-61 and 12-62; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project would help address the existing jobs/housing imbalance in western Riverside County by bringing employment opportunities to an area that is primarily residential. Implementation of the Specific Plan, as amended by the proposed Project, would result in positive impacts upon existing and projected housing conditions within the region, by bringing job opportunities to an area that is largely residential. Impacts would be less than significant. (Draft SEIR, Appendix A, pp. 12-61 and 12-62; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## 2. **Displacement of Housing**

Threshold: Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-62; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the area of the proposed overpass or underpass across the Village West Drive Extension) is undeveloped and does not currently support any housing; therefore, substantial numbers of existing housing would not be displaced and the construction of replacement housing elsewhere would not be necessary as a result of the proposed Project. No impact would occur. (Draft SEIR, Appendix A, p. 12-62; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## N. **PUBLIC SERVICES**

### 1. **New government facilities**

Threshold: 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; Police protection; Schools; Parks; Other public facilities?

Finding: Less than significant. (Draft SEIR, Appendix A, pp. 12-63 and 12-64; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: *Fire.* Implementation of the proposed Project would not include the

construction of residential uses; therefore the Project would not generate population increases or additional demand for fire protection services beyond what was considered under the 2003 Focused EIR. The proposed Project is within areas that were previously slated for development under the originally approved South Campus. As such, impacts would be comparable to those previously identified in past environmental documents prepared for the South Campus Specific Plan. Furthermore, the proposed Project would have a reduced impact compared to the originally approved Project and would pay the required development impact fees. Therefore, the Project would not result in the need for new or expanded fire protection facilities. Impacts would be less than significant. (Draft SEIR, Appendix A, p. 12-63)

*Police protection.* Implementation of the proposed Project would not include the construction of residential uses; therefore, the Project would not generate population increases or additional demand for police protection services beyond what was considered under the 2003 Focused EIR. As such, impacts would be comparable to those previously identified in past environmental documents prepared for the South Campus Specific Plan. Furthermore, the proposed Project would have a reduced impact compared to the originally approved Project and would pay the required development impact fees. Therefore, the Project would not result in the need for new or expanded fire protection facilities. Impacts would be less than significant. (Draft SEIR, Appendix A, p. 12-63)

*Schools/Parks/Other public facilities.* The proposed Project would not generate new population or additional demand for school services, parks, or other public facilities such that new schools, parks, or other public facilities would be required beyond what was considered under the originally approved South Campus of the March Business Center Specific Plan. Impacts would be less than significant. (Draft SEIR, Appendix A, pp. 12-63 and 12-64)

*Proposed Overpass/Underpass.* The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential public services impacts as part of the Final SEIR. The overpass or underpass would provide connectivity within the existing National Cemetery. The National Cemetery is already supported by public services. As such, the analysis determined that the proposed overpass or underpass would not result in new or different public services impacts than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **O. RECREATION**

### **1. Increased Use**

Threshold: 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?

Finding: Less than significant. (Draft SEIR, Appendix A, p. 12-64; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project includes the development of a 6.2-acre open space paseo and dog park, thereby increasing the amount of available recreation space in the western portion of the South Campus Specific Plan area. Further, the previously approved Specific Plan includes approximately 52 acres of parkland near the southeastern corner of South Campus. This parkland area is already developed. Multi-use trails and bikeways are also included in the Transportation section of the Specific Plan. These uses are intended to accommodate the needs of the employees within the Specific Plan area and will be available for residents in the vicinity of the Project site. The developable acreage of the proposed Project is significantly reduced from the originally approved developable acreage, so impacts related to this topic would be reduced from those determined in the 2003 Focused EIR, and impacts would be less than significant. (Draft SEIR, Appendix A, p. 12-64)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential recreation impacts as part of the Final SEIR. The overpass or underpass would provide connectivity within the existing National Cemetery, which is not a recreational use. As such, the analysis determined that the proposed overpass or underpass would not result in new or different recreation impacts than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **2. Construction/Expansion of Recreational Facilities**

Threshold: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Finding: Less than significant. (Draft SEIR, pp. 4.11-6)

Explanation: During operation of the proposed Project, the dog park paseo would be available to the public. Impacts associated with Project operation, including the dog park and paseo, would result in either no impact or less than significant impacts to aesthetics, biological resources, energy, geology and soils, greenhouse gas emissions, land use and planning, hazards and hazardous materials, noise, tribal cultural resources, utilities and service systems, and wildfire. Impacts related to air quality and transportation would be potentially significant. However, the proposed dog park and paseo would be available for passive recreational use and would not generate significant vehicle traffic or result in air emissions

associated with vehicle traffic. The dog park and paseo would be passive recreational facilities that provide a buffer between the residences to the west and the South Campus Specific Plan area to the east. As such, operational impacts associated with the proposed dog park and paseo would be less than significant.

Village West Drive Extension. The Village West Drive Extension component of the proposed Project does not introduce new residential, or recreation-generating land uses. This component of the proposed Project would improve portions of Village West Drive, which currently terminates at Lemay Drive to the south. The Project would provide a through connection between Van Buren Boulevard to the north and Nandina Avenue to the south. None of these actions would result in the introduction of new residents to the Specific Plan area in need of recreational facilities. As such, the construction and operation of the Village West Drive Extension does not include recreational facilities and would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. No impact would occur. (Draft SEIR, pp. 4.11-6)

## **P. TRANSPORTATION / TRAFFIC**

### **1. Conflict with Plans**

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

Finding: Less than significant. (Draft SEIR, p. 4.12-63; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: *Construction.* Traffic operations during the proposed construction phase of the Project may potentially result in short-term traffic deficiencies related to construction employees, export of materials, and import of construction materials. To minimize the impact of construction activities, the Project applicant would be required to develop and implement a March JPA-approved Construction Traffic Management Plan, per PDF-TRAF-1, which would address potential construction-related traffic detours and disruptions. In general, the Construction Traffic Management Plan would ensure that to the extent practical, construction traffic would access the Project site during off-peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses. With the incorporation of PDF-TRAF-1, short term construction impacts would be less than significant.

*Proposed Overpass/Underpass.* The proposed overpass or underpass that would be constructed across the Village West Drive Extension was evaluated for transportation impacts as part of the Final SEIR. The analysis

determined that the proposed overpass or underpass would not result in new or different transportation effects than those identified in the Draft SEIR. The proposed overpass or underpass would be utilized specifically and exclusively for funeral processions as part of the planned future National Cemetery expansion. Existing and future traffic across Village West Drive is not anticipated to have access to or utilize the proposed overpass or underpass, and as such, there would be no changes to the transportation analysis and conclusions within the Draft SEIR. (Draft SEIR, p. 4.12-63; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Project Design Feature (South Campus Specific Plan and Village West Drive Extension)**

**PDF-TRA-1**      **Construction Traffic Management Plan.** Prior to the issuance of building permits, the Project applicant would be required to develop and implement a March JPA-approved Construction Traffic Management Plan addressing potential construction-related traffic detours and disruptions. In general, the Construction Traffic Management Plan would ensure that to the extent practical, construction traffic would access the Project site during off-peak hours; and that construction traffic would be routed to avoid travel through, or proximate to, sensitive land uses.**2. Design Features and Incompatible Uses**

Threshold:      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)?

Finding:      Less than significant. (Draft SEIR, pp. 4.12-66)

Explanation:      Regarding the Village West Drive Extension, the proposed Project would not add truck trips to this roadway. Rather, all trucks would be mandated to turn left at the Village West Drive/Van Buren Boulevard intersection and use the I-215 freeway to travel north or south of the Project site. The Village West Drive Extension would provide a safe and improved route for the Westmont Village retirement living community residents to access community features to the south and for residents south of Nandina Avenue to access the General Old Golf Course and Riverside National Cemetery. Additionally, this extension would improve the connectivity of the region's circulation system, which would enhance the safety of the entire community in times of emergency. As such, impacts associated with the Village West Drive Extension would be considered less than significant. (Draft SEIR, p. 4.12-66)

### **3. Emergency Access**

Threshold: Would the Project result in inadequate emergency access?

Finding: No impact. (Draft SEIR, Appendix A, p. 12-66; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project is consistent with the March Area Emergency Resource Guide because the Project's construction or operations would not result in a physical interference with emergency routes. During construction of the proposed Project, no lane closures are anticipated. As such, adequate emergency access during construction and operation of the proposed Project would be maintained, and the Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Additionally, with improvements to Village West Drive, a through connection between Nandina Avenue to the south and Van Buren Boulevard to the north, would be created thereby improving overall emergency access in the vicinity of the Project site. The proposed overpass or underpass across the Village West Drive Extension would provide additional connectivity within the National Cemetery. No impact would occur. (Draft SEIR, Appendix A, p. 12-66; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **Q. UTILITIES AND SERVICE SYSTEMS**

### **1. Water Supply**

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

Finding: Less than significant. (Draft SEIR, pp. 4.14-22 through 4.14-24; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: A water supply assessment was conducted for the proposed Project. Based on the water supply assessment, the water purveyor that serves the Project area (Western Municipal Water District) concluded that the total projected water supplies available to Western Municipal Water District during normal, single-dry, and multiple-dry years throughout the next 20-year period are sufficient to meet the projected water demands of the proposed Project, in addition to Western Municipal Water District's existing and planned future uses. Impacts would be less than significant. (Draft SEIR, pp. 4.14-22 through 4.14-24)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential utilities and service systems impacts as part of the Final SEIR. The overpass or underpass would provide connectivity within the existing National Cemetery. The National

Cemetery is already supported by the necessary utilities and service systems. As such, the analysis determined that the proposed overpass or underpass would not result in new or different utilities and service systems impacts than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **2. Wastewater Treatment Capacity**

Threshold: 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?

Finding: No impact. (Draft SEIR, pp. 4.14-24 and 4.14-25; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The analysis in the SEIR determined that adequate wastewater treatment capacity is available to serve the Project at existing facilities. Furthermore, given that the proposed Project would result in the generation of less wastewater than would the 2003 Approved South Campus, fewer demands for wastewater services would occur. As such, the South Campus Specific Plan component of the Project was determined to have beneficial impacts since fewer demands for wastewater services would occur. The Village West Drive Extension component was determined to have no impacts relative to wastewater generation, as this aspect of the Project (including the proposed overpass or underpass) would not generate wastewater. As such, beneficial impacts would result from the South Campus Specific Plan Project component, and no impacts would result from the Village West Drive Extension Project component. (Draft SEIR, pp. 4.14-24 and 4.14-25; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **3. Solid Waste Regulations**

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

Finding: Less than significant. (Draft SEIR, Appendix A, p. 12-69; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project will comply with federal, state, and local statutes and regulations related to solid waste. March JPA complies with the intent of state mandates for solid waste reduction by participating in local and regional programs to encourage reduction of solid waste. Compliance with Riverside County ordinances regarding solid waste management would ensure Project consistency with the Riverside County Source Reduction and Recycling Element. Impacts would be less than significant. (Draft SEIR, Appendix A, p. 12-69; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)



## **R. WILDFIRE**

### **1. Emergency Response or Evacuation Plans**

Threshold: Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Finding: No impact. (Draft SEIR, Appendix A, pp. 12-69 and 12-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project is consistent with the March Area Emergency Resource Guide because the Project's construction or operations would not result in a physical interference with emergency routes. During construction of the proposed Project, no lane closures are anticipated. As such, adequate emergency access during construction and operation of the proposed Project would be maintained, and the Project would not physically interfere with an adopted emergency response plan or emergency evacuation plan. Additionally, with improvements to Village West Drive, a through connection between Nandina Avenue to the south and Van Buren Boulevard to the north, would be created thereby improving overall emergency access in the vicinity of the Project site. The proposed overpass or underpass across the Village West Drive Extension would provide additional connectivity within the National Cemetery. No impact would occur. (Draft SEIR, Appendix A, pp. 12-69 and 12-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **2. Exacerbate Wildfire Risk**

Threshold: 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?

Finding: Less than significant. (Draft SEIR, Appendix A, p. 12-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project site (including the proposed overpass or underpass across the Village West Drive Extension) is located in a Local Responsibility Area for fire protection and is not within a designated fire hazard area. Additionally, the Project site is surrounded by development to the north, west, and south. Therefore, the risk of a large, high-intensity wildland fire impacting the site is low. Impacts would be less than significant. (Draft SEIR, Appendix A, p. 12-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **3. Exacerbate Wildfire Risk due to Installation of Infrastructure**

Threshold: In or near a State Responsibility Area or lands classified as very high fire

hazard severity zone, 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?

Finding: Less than significant. (Draft SEIR, pp. 4.15-13 and 4.15-14; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project area (including the proposed overpass or underpass across the Village West Drive Extension) is not located within or near a State Responsibility Area or very high fire hazard severity zone. While the Project would result in the installation of new roadway and utility infrastructure, including the proposed overpass/underpass across Village West Drive, the installation and maintenance of these would not exacerbate fire risk given the Project's location outside of an identified very high fire hazard severity zone. Impacts would be less than significant. (Draft SEIR, pp. 4.15-13 and 4.15-14; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **4. Expose to Post-Fire Hazards**

Threshold: In or near a State Responsibility Area or lands classified as very high fire hazard severity zone, 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?

Finding: Less than significant. (Draft SEIR, pp. 4.15-14 and 4.15-15; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project area (including the proposed overpass or underpass across the Village West Drive Extension) is not located within or near a State Responsibility Area or very high fire hazard severity zone. The proposed Project would not substantially alter the topography of the existing conditions, and the Project area is not susceptible to landslides. In addition, the South Campus Specific Plan and Village West Drive Extension geotechnical studies determined that there was no evidence of on-site landslides, debris flows, or thick surficial deposits typically associated with landslides. Furthermore, the potential for flooding is considered very low, the Village West Drive Extension would result in a beneficial impact with respect to flooding during high-intensity rain events. For these reasons, wildfire-related risk including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes would be minimal. Impacts would be less than significant. (Draft SEIR, pp. 4.15-14 and 4.15-15; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**SECTION III**  
**IMPACTS THAT ARE LESS THAN SIGNIFICANT WITH MITIGATION**  
**INCORPORATED**

March JPA hereby finds that Mitigation Measures have been identified in the SEIR and in these Findings that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

**A. AESTHETICS**

**1. Scenic Vistas**

Threshold: Would the Project have a substantial adverse effect on a scenic vista?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, p. 12-35; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The March JPA General Plan designates the area looking east and northeast of the March JPA Planning Area toward the Box Springs Mountains and San Jacinto Mountains as a scenic vista. As outlined in the 2003 Focused EIR, the visual aspects of the March Business Center Specific Plan were evaluated to identify new aesthetic impacts as compared to the MEIR for the March JPA General Plan. The evaluation determined that environmental impacts to aesthetics, as documented in the MEIR would not be changed by the March Business Center Specific Plan. Considering that the developable acreage of the proposed Project is significantly reduced from the originally approved developable acreage, impacts related to this topic would be reduced from those determined in the 2003 Focused EIR. Pursuant to the Mitigation Monitoring and Reporting Program (MMRP) adopted for the 2003 Focused EIR, the South Campus Specific Plan component of the proposed Project would be required to comply with Mitigation Measure I-1 from the 2003 Focused EIR. No new impacts to scenic vistas are expected to occur because the Project area is below the scenic vista identified in the March JPA General Plan. The improvements to, and extension of Village West Drive to the south, would provide a connection between Van Buren Boulevard and Nandina Avenue. Although the Village West Drive extension was not addressed in previous environmental documents for the South Campus Specific plan, it is currently an unpaved yet drivable roadway from Lemay Drive south to Nandina Avenue. As such, the proposed improvements to this roadway would not affect a scenic vista, as the roadway would be constructed at-grade. Regarding the proposed overpass/underpass that may be constructed across the Village West Drive Extension, if the Project constructed an underpass, it would be depressed below the existing grade and visible only to those using Village West Drive or located within the adjacent National Cemetery. If the Project constructed an overpass, the structure would have a maximum height of approximately 25 feet above

grade, which is equivalent to the height of a 2-story house. Given that the area surrounding the National Cemetery and the proposed overpass or underpass is developed with training facilities associated with the Ben Clark Training Center, single-family residences in the Westmont Village retirement community, and the business park and industrial development in the South Campus Specific Plan area, the proposed overpass or underpass would not be visually incompatible with the surrounding land uses.

Overall, impacts would be reduced to a level below significance upon implementation of Mitigation Measure I-1. Impacts would thus be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, p. 12-35; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measure (South Campus Specific Plan component only)**

**I-1** All projects are required to comply with the Specific Plan Design Guidelines, landscape concept plan and Development Code, which will ensure the following:

- Conflicts and incompatibilities between land uses will not occur through the use of landscaped setbacks, buffers, site design, site orientation, architectural features, walls or fences, density/intensity reductions, reduced hours of operation for commercial and industrial uses, shielding of lighting, and the like.
- The enhancement and preservation of natural and man-made features, such as major roadways, rail lines, drainage courses, utility corridors, groups of rock outcroppings, and tree rows to create boundaries, entryways, and separate entities for distinct geographic portions of the Specific Plan.
- Preservation of Van Buren Boulevard and Alessandro Boulevard scenic corridors and enhancement of the gateway treatment at the Riverside National Cemetery.

## **2. Visual Character/Quality**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.1-4 through 4.1-6; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Implementation of the proposed Project would result in new development within the currently undeveloped portions of the Project site. However, proposed land uses within South Campus would be consistent with currently permitted land use designations of the March JPA General Plan. In addition, compliance with the adopted March Business Center Specific Plan Development Regulations and Design Guidelines and implementation of Mitigation Measure I-1 from the 2003 Focused EIR (for the South Campus Specific Plan component of the Project) would ensure that proposed and future development within the South Campus would result in coordinated design and would enhance the overall visual identity of the March Business Center. The proposed Village West Drive Extension would not include construction of any vertical features that would degrade the public views in the vicinity. In addition, the proposed Village West Drive Extension would require removal of an abandoned and deteriorating water tank adjacent to the existing roadway alignment, which would improve the visual quality of surrounding vacant land for drivers that utilize the improved roadway. Regarding the proposed overpass/underpass that may be constructed across the Village West Drive Extension, if the Project constructed an underpass, it would be depressed below the existing grade and visible only to those using Village West Drive or located within the adjacent National Cemetery. If the Project constructed an overpass, the structure would have a maximum height of approximately 25 feet above grade, which is equivalent to the height of a 2-story house. Given that the area surrounding the National Cemetery and the proposed overpass or underpass is developed with training facilities associated with the Ben Clark Training Center, single-family residences in the Westmont Village retirement community, and the business park and industrial development in the South Campus Specific Plan area, the proposed overpass or underpass would not be visually incompatible with the surrounding land uses.

Implementation of the proposed Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, and impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.1-4 through 4.1-6; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measure (South Campus Specific Plan component only)**

- I-1 (See above)

**3. Light/Glare**

Threshold: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-36 and 12-37; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The existing March Business Center Design Guidelines impose comprehensive and detailed requirements for all aesthetic features including lighting, colors, textures, landscaping, and site layouts. Accordingly, compliance with the March Business Center Design Guidelines would prevent significant impacts related to substantial light or glare affecting day or nighttime views in the area. There would be no significant impact to day or nighttime views as a result of the Project's compliance with the requirements of the March Business Center Design Guidelines. Compliance with the design guidelines is imposed via Mitigation Measure I-1, which would be required for the South Campus Specific Plan component of the Project. The improvements to, and extension of, Village West Drive to the south would provide a connection between Van Buren Boulevard and Nandina Avenue. Additionally, the proposed overpass or underpass may be installed across this roadway extension. Village West Drive is currently an unpaved yet drivable roadway from Lemay Drive south to Nandina Avenue. Lighting standards would be included as part of the roadway improvements and would be consistent with the County of Riverside requirements for roadways. Compliance with County standards would ensure that roadway improvements would not create a new source of light or glare that would affect day or nighttime views in the area. Overall, proposed Project impacts would be reduced to a level below significance upon implementation of Mitigation Measure I-1. Impacts would thus be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-36 and 12-37; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measure (South Campus Specific Plan component only)**

- I-1 (See above)

**B. AIR QUALITY**

**1. Cumulatively Considerable Increase In Pollutants**

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

Finding: Less than significant with mitigation. (Draft SEIR, p. 4.2-30)

Explanation: The Project's anticipated construction emissions were found to exceed the volatile organic compound (VOC) and NO<sub>x</sub> SCAQMD significance thresholds; thus, the Project's unmitigated impacts would be potentially significant and would therefore, per SCAQMD criteria, would be cumulatively potentially significant. In order to reduce the Project's construction-source emissions, MM-AQ-1 through MM-AQ-4 would be implemented for both the South Campus Specific Plan component and

Village West Drive Extension component (including the proposed overpass/underpass). These measures would require Tier 4 off-road construction equipment, “Super-Compliant” low VOC paints, provision of a construction relations officer, and preparation of a fugitive dust control plan. With incorporation of MM-AQ-1 through MM-AQ-4, construction impacts associated with the proposed Project would be less than significant. (Draft SEIR, p. 4.2-30)

### **Mitigation Measures**

- **MM-AQ-1 through MM-AQ-4** (See below)

## **C. BIOLOGICAL RESOURCES**

### **1. Special-Status Species**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.3-21 through 4.3-27; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Implementation of mitigation measures D-1 through D-6 from the 2003 Focused EIR would be required for biological resources impacts. However, the proposed Project would still result in potentially significant impacts requiring further mitigation, as further described below.

Two federally and/or state listed species have been documented on or immediately adjacent to the South Campus Specific Plan Project site and to the Village West Drive Extension Project site (least Bell’s vireo and Stephens’ kangaroo rat). Several non-listed special-status species also have the potential to occur at the South Campus Specific Plan Project site and at the Village West Drive Extension Project site (including smooth tarplant, burrowing owl, coastal whiptail, loggerhead shrike, red diamond rattlesnake, and San Diego black-tailed jackrabbit). Additionally, several sensitive plant species and the federally endangered fairy shrimp have the potential to occur within the vicinity of the proposed overpass/underpass across the Village West Drive Extension.

*Least Bell’s vireo.* The Project would not directly impact habitat for this species; however, development would occur in close proximity to occupied and suitable habitat, with some buildings proposed approximately 50–75 feet away from a designated least Bell’s vireo conservation easement area. As such, indirect impacts to least Bell’s vireo could occur and are considered potentially significant. With the implementation of Mitigation MM-BIO-1, Least Bell’s Vireo Avoidance

and Minimization Measures, and MM-BIO-2, Construction Limits Demarcation for Sensitive Habitat and Jurisdictional Waters, temporary indirect impacts to least Bell's vireo would be reduced to less than significant by identifying active nests of the species and establishing no-entry buffers, instituting an environmental awareness training program that includes the species, monitoring of active nests during construction, and erecting fences around suitable habitat for the species. As such, impacts would be less than significant with mitigation incorporated.

*Stephens' kangaroo Rat.* Stephens' kangaroo rat has been documented previously on the South Campus Specific Plan site, adjacent to the Village West Drive Extension Project site, and in surrounding areas. Suitable habitat is present within the South Campus Specific Plan area and within the Village West Drive Extension alignment, and burrows consistent with the species were observed during general biological surveys. Direct impacts to Stephens' kangaroo rat could result from ground-disturbing activities (e.g., clearing, grubbing, grading). Indirect short-term impacts to Stephens' kangaroo rat include noise, vibration, lighting, and increased human presence, and substantial long-term impacts include noise, lighting, and traffic collisions to nocturnal wildlife. The South Campus Specific Plan Project's direct and indirect impacts on the Stephen's kangaroo rat are comparable to those of the 2003 Approved South Campus. The South Campus Specific Plan's impacts would thus be reduced through implementation of all requirements from the March Air Force Base closure U.S. Fish and Wildlife Service (USFWS) Section 7 consultation (BO 1-6-99-F-13) (the "1999 Biological Opinion (BO)") and implementation of the terms and conditions agreed upon in the *Center of Biological Diversity v. Jim Bartel et. al.* Settlement Agreement (S.D. Cal. No. 09-cv-1854-JAH-POR). MM-BIO-2 would be required for both the South Campus Specific Plan component and the Village West Drive Extension component. This measure would mitigate for indirect impacts to the species by limiting impacts to suitable habitat. Additionally, a mitigation fee would be required and would be paid. For these reasons, the Project's impacts to the Stephens' kangaroo rat would be less than significant with mitigation incorporated.

*Burrowing owl.* Suitable foraging and nesting habitat (burrows) occur on the South Campus Specific Plan Project site and on the Village West Drive Extension Project site. As such, there is potential for this species to occur within the Project footprint or to colonize the site prior to Project construction. If present, impacts such as habitat destruction, and potentially death, injury, or harassment of nesting birds, their eggs, and their young could occur. With the implementation of MM-BIO-3, Burrowing Owl Avoidance and Minimization Measures, direct and indirect impacts to burrowing owl would be reduced to less than significant through preconstruction surveys for the species, no-work buffers around occupied burrows, or the preparation of a Burrowing Owl



Relocation and Mitigation Plan. As such, impacts would be less than significant with mitigation incorporated.

*Coastal whiptail, loggerhead shrike, red diamond rattlesnake, and San Diego black-tailed jackrabbit.* Four additional California Species of Special Concern, coastal whiptail, loggerhead shrike, red diamond rattlesnake, and San Diego black-tailed jackrabbit, have a moderate potential for occurrence based on suitable habitat or observation during surveys. Additionally, two Watch List wildlife species, California horned lark and orange-throated whiptail, have a moderate potential for occurrence based on the presence of suitable habitat. Impacts to these species are described below:

- Adult and juvenile loggerhead shrike and California horned lark would also be highly mobile and would be expected to avoid construction; however, the nests of the species with eggs or hatched young that do not have the mobility to safely leave the nest could be directly impacted by the removal of vegetation or indirectly impacted if the adults abandon an active nest. Thus, potentially significant impacts could occur if vegetation clearing is undertaken during the breeding season. Implementation of MM-BIO-4, Nesting Bird Avoidance and Minimization Measures, would reduce the impacts to less than significant by implementing preconstruction surveys for active nests and establishing no-work buffers around active nests. As such, impacts would be less than significant with mitigation incorporated.

*Species associated with potential ponding.* As part of the Final SEIR, the area of the proposed overpass or underpass across the Village West Drive Extension was evaluated for potential impacts. Biological surveys were conducted for the potential additional areas of disturbance. The surveys identified that the proposed overpass/underpass is located within the vicinity of three potential ponding areas. These areas may support sensitive plant species and federally endangered fairy shrimp, including vernal pool fairy shrimp and Riverside fairy shrimp. However, all of the potential ponding areas occur outside of the potential impact area; as such, direct impacts are not anticipated. However, because some of the ponding areas occur in close proximity to the proposed work limits, indirect impacts during construction could occur. As determined in the Final SEIR, impacts would be reduced to below a level of significance through incorporation of the mitigation measures that have already been identified in the Draft SEIR. As such, impacts would be less than significant with mitigation incorporated.

*Nesting birds.* The South Campus Specific Plan Project site and the Village West Drive Extension Project site (including the area of the proposed overpass or underpass) have the potential to support avian nests, which would be protected under the Migratory Bird Treaty Act and/or the

California Fish and Game Code (Section 3503), under which it is unlawful to “take, possess, or needlessly destroy” avian nests or eggs. Potentially significant impacts could occur if vegetation clearing is undertaken during the breeding season. With the implementation of MM-BIO-4, Nesting Bird Avoidance and Minimization Measures, impacts to nesting birds would be reduced to less than significant. As such, impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.3-21 through 4.3-27; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- D-1** Prior to construction activity, the applicant shall coordinate with USFWS to assure that the requirements and stipulations of the 1999 Biological Opinion and the Biological Opinion Clarification Letter (September 6, 2002) are met. The 1999 Biological Opinion and the 1999 Biological Opinion Clarification Letter are included in Appendices A and B of the Biological Resources Review found in Appendix D of the 2003 Focused EIR. Mitigation for potential impacts to federal or state listed species shall be as per the 1999 Biological Opinion and the 1999 Biological Opinion Clarification Letter issued by USFWS. This mitigation shall include the replacement 35.2 acres of impacted occupied Stephens’ kangaroo rat (SKR) habitat at a 1:1 ratio. As of September 2002, the March JPA is responsible for 14.2 acres of mitigation at a 1:1 ratio, as 21 acres of USFWS approved occupied habitat have previously been acquired by the March JPA and serve as mitigation for 21 acres of SKR occupied habitat. Other required mitigation (78.4 acres discussed in the 1999 BO Clarification letter) will be at a fee of \$500 per acre.
- D-2** Per the 1999 BO, avoid 13 acres of USFWS designated least Bell’s vireo riparian habitat north and south of Van Buren Boulevard by utilizing 100-foot buffer zones in these areas.
- D-3** If construction activity is planned during nesting/breeding season, a qualified environmental scientist shall conduct a field review of the affected areas prior to vegetation clearing activity to assess the areas for occupancy by the least Bell’s vireo.
- D-4** Prior to construction activity, the applicant shall coordinate with the L.A. District Corps office to assure conformance with the requirements of Section 404 of the Clean Water

Act.

**D-5** Prior to construction activity, the applicant shall coordinate with the Santa Ana Water Quality Board (Region 8) to assure conformance with the requirements of Section 404/401 of the Clean Water Act and the State of California Porter Cologne Water Quality Control Act.

**D-6** Prior to activity within waters of the U.S., the applicant shall coordinate with the California Department of Fish and Game (Eastern Sierra and Inland Dessert Region 6) relative to conformance to the Lake and Streambed Alteration permit requirements.

**MM-BIO-1 Least Bell's Vireo Avoidance and Minimization Measures.** Least Bell's vireo have been documented adjacent to proposed South Campus Specific Plan Project work areas within the conservation easement and there is suitable habitat for the species along the Village West Drive Extension Project. Species-specific mitigation will include construction timing and noise restrictions in accordance with the *Center of Biological Diversity v. Jim Bartel et al.* Settlement Agreement (S.D. Cal. No. 09-cv-1854-JAH-POR) and standard vireo noise avoidance techniques to avoid noise impacts on this species. The following avoidance and minimization measures shall be implemented during Project construction activities and confirmed by the March Joint Powers Authority (JPA):

- 1) **Preconstruction Least Bell's Vireo Nesting Survey.** Construction activities within 500 feet of the conservation area (see Figure 4.3-1) and suitable habitat for least Bell's vireo (southern riparian forest and southern willow scrub) along the Village West Drive Extension Project (see Figure 4.3-2) shall commence outside of the nesting season for least Bell's vireo (April 10 to July 31). If construction activities occur during the least Bell's vireo nesting season, a qualified biologist shall conduct a focused least Bell's vireo nesting bird survey within 3 days of the start. If least Bell's vireo nests or occupied habitat are found within 500 feet of project activity, then the qualified biologist shall establish an avoidance buffer radius of 500 feet, or as approved by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), which shall be maintained and avoided during construction activities until the nest is determined by the biologist to no longer be active.

- a) If construction activity within 500 feet of the conservation area commences outside of the nesting bird season, then it is assumed that birds that nest within the conservation area during ongoing activity are unaffected by the Project.
- 2) **Environmental Awareness Training.** A qualified biologist shall prepare an environmental awareness training program that must be taken by all construction personnel working on projects within 500 feet of the conservation area prior to their involvement with activities on the project site. The training shall cover the following points: least Bell's vireo natural history, protected species avoidance measures to be implemented by all personnel, and the role and responsibility of the biological monitor. The training shall be prepared in a digital format (e.g., Microsoft PowerPoint) that will allow the project contractor to administer it on a daily basis throughout construction, if needed, and a sign-in sheet indicating the personnel who have received the training shall be submitted to the March JPA as needed.
- 3) **Construction Monitoring.** If least Bell's vireo nests or occupied habitat are found during the initial survey, then a qualified biological monitor shall be present fulltime during initial grading activities within 1,000 feet of the nest/occupied habitat location or until they determine in their professional opinion that monitoring is no longer needed. The biological monitor shall be responsible for taking noise level measurements at the accessible edge of the habitat using a decibel meter. construction noise levels shall not exceed 60 A-weighted decibels sound equivalent level (dBA  $L_{eq}$ ) hourly average in riparian habitats occupied by least Bell's vireo unless authorized by the appropriate regulatory authorities (i.e., CDFW and USFWS). The biological monitor shall have the authority to stop work as needed to avoid indirect impacts to least Bell's vireo due to noise level exceeding a 60 dBA  $L_{eq}$  hourly average or a noise level authorized by the appropriate regulatory authorities (i.e., CDFW and USFWS). A weekly biological monitoring report shall be submitted to March JPA that shall include noise level data and any action taken to reduce noise. A post-construction biological monitoring report shall be prepared to document compliance with these requirements and shall

be submitted to the satisfaction of the March JPA.

**MM-BIO-2 Construction Limits Demarcation for Sensitive Habitat and Jurisdictional Waters.** Prior to the start of all earth-moving activities (e.g., clear and grub, grading) adjacent to the conservation area and buckwheat scrub within the South Campus Specific Plan Project, and for work near the delineated jurisdictional waters (see Figure 4.3-3 and Attachment 1 to the Final SEIR), southern riparian forest, and southern willow scrub on the Village West Drive Extension Project, and adjacent to suitable habitat for Stephen's kangaroo rat (non-native grasslands), the project contractor shall demarcate the construction limits with temporary construction fencing so that sensitive habitats and jurisdictional waters are avoided by construction personnel and equipment. The fencing shall be maintained until construction is completed in those areas.

**MM-BIO-3 Burrowing Owl Avoidance and Minimization Measures.** Prior to the initiation of construction activities, a qualified biologist shall conduct preconstruction surveys for burrowing owl within suitable habitat (non-native grassland, non-native grassland/paniculate tarplant, disturbed habitat, and ruderal areas) to determine presence/absence of the species. The survey shall be conducted in accordance with the most current California Department of Fish and Wildlife (CDFW) protocol within 30 days of site disturbance to determine whether the burrowing owl is present at the site. Preconstruction surveys shall include suitable burrowing owl habitat within the Project footprint and within 500 feet of the Project footprint (or within an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists). If burrowing owls are not detected during the clearance survey, no additional mitigation is required.

If burrowing owl is located, occupied burrowing owl burrows shall not be disturbed during the nesting season (February 1 through August 31) unless a qualified biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg laying and incubation or that juveniles from the occurred burrows are foraging independently and capable of independent survival. A 500-foot non-disturbance buffer (where no work activities may be conducted) shall be maintained between Project activities and nesting burrowing owls during the nesting season, unless otherwise authorized by

CDFW.

If burrowing owl is detected during the non-breeding season (September 1 through January 31) or confirmed to not be nesting, a 160-foot non-disturbance buffer shall be maintained between the Project activities and occupied burrow. Alternatively, a Burrowing Owl Relocation and Mitigation Plan may be prepared and submitted for approval by CDFW. Once approved, the Plan would be implemented to relocate non-breeding burrowing owls from the Project site. The Plan shall detail methods and guidance for passive relocation of burrowing owls from the Project site, provide monitoring and management of the replacement burrow sites, reporting requirements, and ensure that a minimum of two suitable, unoccupied burrows are available off site for every burrowing owl or pair of burrowing owls to be passively relocated. Compensatory mitigation of habitat would be required if occupied burrows or territories occur within the permanent impact footprint. Ratios typically include a minimum of 19.5 acres per nesting burrow lost; however, habitat compensation shall be approved by CDFW and detailed in the Burrowing Owl Relocation and Mitigation Plan.

The Project applicant shall submit at least one burrowing owl preconstruction survey report to the satisfaction of the March Joint Powers Authority, to document compliance with this mitigation measure.

**MM-BIO-4 Nesting Bird Avoidance and Minimization Measures.** To avoid direct impacts to raptors and/or native/migratory birds (including loggerhead shrike and California horned lark), vegetation removal and grading activities should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, a qualified biologist shall conduct a preconstruction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within ten (10) calendar days prior to the start of construction activities (including removal of vegetation). If nesting birds are observed, a letter report or mitigation plan in conformance with applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding

activities is avoided. The report or mitigation plan shall be submitted to the California Department of Fish and Wildlife and/or U.S. Fish and Wildlife Service as applicable for review and approval and implemented to the satisfaction of those agencies. The project biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the preconstruction survey, no further mitigation is required.

## 2. Wetlands

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.3-28, 4.3-29, and 4.3-35; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: No direct impacts would occur to jurisdictional wetlands or non-wetland waters due to the implementation of the Village West Drive Extension Project or the proposed overpass or underpass. However, due to the proximity of jurisdictional wetlands and waters, potential temporary indirect significant impacts could occur from construction activities resulting from accidental incursion into the areas, generation of fugitive dust, and introduction of chemical pollutants (including herbicides). Erosion and chemical pollution may also affect wetlands/jurisdictional waters. However, erosion-control measures would be implemented during construction as part of the Storm Water Pollution Prevention Plan for the Project. Additionally, MM-BIO-2 would be implemented and would require fences to be installed around jurisdictional waters to prohibit entry. With the implementation of MM-BIO-2, Construction Limits Demarcation for Sensitive Habitat and Jurisdictional Waters, and compliance with existing regulations, temporary indirect impacts to wetlands from the Village West Drive Extension and the proposed overpass or underpass would be reduced to less than significant. As such, impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.3-28, 4.3-29, and 4.3-35; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measure (Village West Drive Extension component only)**

- **MM-BIO-2** (See above)

## 3. Local Policies Protecting Biological Resources

Threshold: Would the Project conflict with any local policies or ordinances protecting

biological resources, such as a tree preservation policy or ordinance?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.3-30 and 4.3-31; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project would not generally conflict with local policies protecting biological resources. For the South Campus Specific Plan, impacts would be less than significant after mitigation. The March JPA General Plan has a policy that states: where practical, allow development to remove only the minimum natural vegetation and encourage the revegetation of graded areas with native plant species. The proposed South Campus Specific Plan Project would impact 0.11 acres of buckwheat scrub, which is natural vegetation. However, MM-BIO-2 would be implemented and would restrict impacts to buckwheat scrub to the minimal extent needed for construction at the South Campus Specific Plan Project site. Impacts would therefore be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.3-30 and 4.3-31; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measure (South Campus Specific Plan component only)**

- **MM-BIO-2** (See above)

**4. Habitat Conservation Plans**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.3-31 and 4.3-32; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

Explanation: The South Campus Specific Plan Project impacts were addressed under the 2003 Focused EIR and as part of the March Air Base realignment. This area is included in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). The South Campus Specific Plan is within an area where burrowing owl surveys are required. Though the March JPA is an independent agency and therefore not a participant under the MSHCP, proposed Project mitigation (MM-BIO-3) is consistent with MSHCP conditions for burrowing owl. Mitigation for state and federally endangered species was included as part of the March Air Force Base closure USFWS Section 7 consultation (BO 1-6-99-F-13) and subsequent *Center of Biological Diversity v. Jim Bartel et. al.* Settlement Agreement (S.D. Cal. No. 09-cv-1854-JAH-POR). As such, South Campus Specific Plan Project impacts to the MSHCP would be less than significant with mitigation incorporated.



The Village West Drive Extension impacts were not considered in connection with the larger March Air Base re-use, and this area is included in the MSHCP. However, the Village West Drive Extension Project is not within an area designated for conservation and would not conflict with the goal of the MSHCP for acquiring lands of high habitat value. The Village West Drive Extension is within an area where burrowing owl surveys are required. Although the March JPA is an independent agency and therefore not a participant under the MSHCP, proposed Project mitigation (MM-BIO-3) is consistent with the MSHCP conditions for burrowing owl. As such, Village West Drive Extension impacts to the MSHCP would be less than significant with mitigation incorporated. The proposed overpass or underpass across the Village West Drive Extension would not result in any new or different impacts. (Draft SEIR, pp. 4.3-31 and 4.3-32; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

**Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- **MM-BIO-3** (See above)

**D. CULTURAL RESOURCES**

**1. Archeological resources**

Threshold: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines section 15064.5?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-44 and 12-45; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: As stated in the 2003 Focused EIR, although development within the Specific Plan area has the potential to affect existing archaeological resources due to on-site excavation and grading, impacts to archaeological resources resulting from the development of the Specific Plan are not likely to be significant. The proposed Project is within areas that were previously slated for development and evaluated under the 2003 Focused EIR, which determined impacts would be less than significant with implementation of Mitigation Measure L-1.

The Village West Drive extension was not addressed in previous environmental documents for the South Campus Specific Plan. However, the only known features of prehistoric or historical origin located partially within the roadway extension area date to the 1940s-1960s era, do not exhibit any special merit in architecture, engineering, or construction, and hold little promise for important archaeological data. As such, impacts would be limited to uncovering of previously unknown, buried archaeological remains during earth-moving activities. Implementation of

Mitigation Measure L-1 would ensure that if buried archaeological remains are encountered during any earth-moving operations associated with the Village West Drive extension, all work in that area should be halted or diverted until a qualified archaeologist can evaluate the nature and significance of the finds.

The area of the proposed overpass or underpass across the Village West Drive Extension was evaluated for the presence or absence of archaeological resources. Two previously recorded prehistoric archaeological sites are located in close proximity to the eastern end of the proposed overpass or underpass. However, the proposed overpass/underpass has been designed to avoid any impacts to these resources. Additionally, the construction of the overpass/underpass would be subject to archaeological and/or Native American monitoring through mitigation measures MM-TCR-1 and MM-TCR-2. Also, any buried archaeological remains encountered during construction would be subject to evaluation by a qualified archaeologist through mitigation measures MM-TCR-1 and MM-TCR-2 as well as Mitigation Measure L-1 from the 2003 Focused EIR. With these mitigation measures, impacts on these features would be less than significant.

Overall, the proposed Project's impacts on archaeological resources would be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-44 and 12-45; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

**L-1** If archaeological or paleontological resources are encountered at the time of grading or Project construction, all Project work in the area of the resource shall cease until the area has been surveyed by a qualified archaeologist or paleontologist in conformance with the Cultural Resource Management Plan.

**MM-TCR-1 and MM-TCR-2** (See below)

## **2. Human Remains**

Threshold: Would the Project disturb any human remains, including those interred outside or dedicated cemeteries?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-45; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: As stated in the 2003 Focused EIR, although development within the Specific Plan area has the potential to affect human remains due to on-site excavation and grading, impacts to human remains resulting from the

development of the Specific Plan are not likely to be significant. The proposed Project is within areas that were previously slated for development and evaluated under the 2003 Focused EIR, which determined impacts would be less than significant with implementation of Mitigation Measure L-1. If human remains are encountered during grading and other construction excavation within the Specific Plan area, the Village West Drive Extension, or the proposed overpass or underpass, work in the immediate vicinity shall cease and the County Coroner shall be contacted pursuant to Health and Safety Code § 7050.5. Upon compliance with regulatory requirements pertaining to human remains and upon implementation of Mitigation Measure L-1, impacts would be below a level of significance. Impacts would thus be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-45; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- L-1 (See above)

**E. ENERGY**

**1. Energy Consumption**

Threshold: Would the Project result in wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.4-10 through 4.4-15)

Explanation:

**Operational Use**

Electricity. The operational phase would require electricity for multiple purposes, including building heating and cooling, lighting, appliances, and electronics. The electricity consumption associated with the proposed Project would be approximately 30,102,581 kilowatt-hours per year (Appendix E of the Draft SEIR), not accounting for mitigation measures, such as installation of solar photovoltaic systems that would generate approximately 20,201 megawatt-hours per year (Appendix G of the Draft SEIR).

The building envelope; heating, ventilation, and air conditioning (HVAC) system; lighting; and other systems, such as electric motor equipment, would be designed to maximize energy performance. The Project is subject to statewide mandatory energy requirements as outlined in CCR

Title 24, Part 6. CCR Title 24, Part 11, contains voluntary energy measures that are applicable to Project under CALGreen. Prior to Project approval, March JPA would ensure that the Project would meet Title 24 requirements applicable at that time, as required by state regulations, through its plan review process. Project-consumed electricity is also subject to the cap-and-trade regulation. Furthermore, the Project would include mitigation measure (MM)- GHG-1, install 12 megawatts of solar photovoltaic electricity generation; MM-GHG-2, install Energy Star-certified light bulbs and light fixtures; MM-GHG-3, install duct insulation; and MM-GHG-4, design cool roofs, use energy-efficient HVAC equipment, and lighting fixtures. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with electricity future projections for the region. For these reasons, the electricity consumption of the Project would not be considered inefficient or wasteful, and impacts would be less than significant. For comparison purposes, CalEEMod (Version 2016.3.2) was used to estimate the 2003 Approved South Campus and Project (Proposed Project + Built/Entitled Land Use) emissions from energy uses (see Appendix B for calculations). According to these estimations, the net change in electricity consumption associated with the 2003 Approved South Campus to the currently proposed Project (Proposed Project + Built/Entitled Land Use) would consume a net reduction in approximately 32,224,921 kilowatt-hours per year (Appendix E of the Draft SEIR). The electricity consumption associated with the proposed Project would be less than the 2003 Approved South Campus.

Natural Gas. Natural gas consumption during operation would be required for various purposes, including building heating and cooling. The natural gas consumption associated with the proposed Project would be approximately 42,189,886 thousand British thermal units per year (Appendix E of the Draft SEIR). As with electricity demand, natural gas demand calculations for the Project assumed compliance with Title 24 standards for 2019. The building envelope, HVAC system, lighting, and other systems would be designed to maximize energy performance. The Project is subject to statewide mandatory energy requirements, as outlined in CCR Title 24, Part 6. CCR Title 24, Part 11, contains voluntary energy measures that are applicable to the Project under CALGreen. Prior to Project approval, March JPA would ensure that the Project would meet Title 24 requirements applicable at that time, as required by state regulations, through its plan review process. Project-consumed natural gas is also subject to the cap-and-trade regulation. Furthermore, the Project would include MM-GHG-4, use energy-efficient HVAC equipment and energy-efficient water heaters. The Project's energy requirements would not significantly affect local and regional supplies or require additional capacity. The Project's energy usage during peak and base periods would also be consistent with natural gas future projections for the region. For

these reasons, the natural gas consumption of the Project would not be considered inefficient or wasteful, and impacts would be less than significant.

Petroleum. The majority of fuel consumption resulting from the Project's operational phase would be attributable to motor vehicles traveling to and from the Project site, and employee vehicles traveling around the Project site. Similar to construction worker and vendor trips, fuel consumption for operation was estimated by converting the total CO<sub>2</sub> emissions from each land use type to gallons using the conversion factors for CO<sub>2</sub> to gallons of gasoline or diesel. The passenger vehicles and truck fleet mix were provided in the Traffic Impact Analysis (Appendix K of the Draft SEIR). The annual mobile-source fuel consumption associated with the proposed Project would consume approximately reduction in approximately 730,276 gallons of gasoline per year and increase in approximately 2,390,861 gallons of diesel consumed per year beginning in 2024 (Appendix E of the Draft SEIR), not accounting for mitigation measures, such as installation of electric vehicle charging stations. Over the lifetime of the Project, the fuel efficiency of the vehicles being used by the employees is expected to increase. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Project site during operation would decrease over time. There are numerous regulations in place that require and encourage increased fuel efficiency. For example, CARB has adopted an approach to passenger vehicles by combining the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California (CARB 2013). Additionally, in response to SB 375, CARB adopted the goal of reducing per-capita GHG emissions from 2005 levels by 8% by 2020, and 18% by 2035 for lightduty passenger vehicles in the planning area for the Southern California Association of Governments. As such, operation of the Project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy. Although the Project would increase petroleum use during operation as a result of employees commuting to the site, the use would be a small fraction of the statewide use and, due to efficiency increases, would diminish over time. Also, although not quantified herein, MM-GHG-8, installing 20 electric vehicle charging stations; M-GHG-9, reserving 5% of parking spaces for preferential parking for carpool and vanpool; MM-GHG-10, employers providing video conferencing facilities for employees; MM-GHG-11, installing bicycle parking facilities; MM-GHG12, providing showers, lockers and changing space for employees; MM-GHG-13, providing on-site food vending machines and accommodations; and MM-GHG-14, accommodate SmartWay trucks would reduce petroleum use during operation, as implementation of these mitigation measures would reduce the amount of fuel consumption by the Project. MM-GHG-14 would reduce petroleum use from trucks during operation, since SmartWay

trucks use less fuel than non-SmartWay trucks (see Section 4.6, Greenhouse Gas Emissions). The transportation energy supplies would be sufficient to serve the Project's peak energy consumptions, and the project would comply with existing energy standards with regards to transportation fuel consumption. Given these considerations, petroleum consumption associated with the Project would not be considered inefficient or wasteful, and impacts would be less than significant. For comparison purposes, calculations for the net change in annual mobile-source fuel consumption are provided in Table 4.4-5 of the Draft SEIR. Mobile sources from the net change associated with the proposed Project as compared to the 2003 Approved South Campus would result in a reduction in approximately 730,276 gallons of gasoline per year and increase in approximately 2,390,861 gallons of diesel consumed per year beginning in 2024. By comparison, California as a whole consumes approximately 18.6 billion gallons of petroleum in 2017 (EIA 2019c). Furthermore, the Project would include on-site cargo handling equipment. For this Project, it was assumed that on-site modeled operational equipment would include up to 11 200-horsepower, compressed natural gas or gasoline-powered yard tractors operating 4 hours per day, 365 days a year. (Draft SEIR, pp. 4.4-10 through 4.4-15)

## **F. GEOLOGY AND SOILS**

### **1. Landslides**

Threshold: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-48 and 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project area is located on generally gentle sloping terrain, and large land/mudslides do not appear probable. There are no steep slopes on or around the site that would be subject to landslide. The proposed Project would not introduce land use designations substantively different from those evaluated in the 2003 Focused EIR. Considering that the developable acreage of the proposed Project is significantly reduced from the originally approved developable acreage, and that the location of the proposed improvements to and extension of Village West Drive (including the proposed overpass or underpass) are similar to those of the South Campus, impacts related to this topic would be comparable to those determined in the 2003 Focused EIR, which were determined to be less than significant with mitigation incorporated. The proposed Project would thus be required to comply with Mitigation Measures K-1 through K-5 from the 2003 Focused EIR. Impacts would be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-48 and 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

## **Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- K-1** All grading should be performed in accordance with the grading guidelines outlined in the March JPA Development Code.
- K-2** All future grading and construction of the project site shall comply with the geotechnical recommendations contained in the Preliminary Geotechnical Investigation: March Business Park Phase 1-3 prepared by Inland Foundation Engineering, Inc., dated July 10, 2002. This report contains specific recommendations for mitigating geotechnical conditions related to soils earthwork, slope stability, and ground and surface waters. All recommendations contained in the report shall be incorporated into all final and engineering and grading plans.
- K-3** All future development shall use proper erosion control measures during and following construction.
- K-4** Revegetate graded area with native plants compatible to the area to prevent erosion.
- K-5** All future development of the project site shall adhere to the Uniform Building Code and State building requirements in effect at the time specific development is proposed.

## **2. Erosion**

Threshold: Would the Project result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-48 and 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: According to the 2003 Focused EIR, surficial soils have a moderate-to-high susceptibility to erosion. The Project would be required to implement erosion control measures per standard engineering practices, March JPA requirements (i.e., Development Code Section 9.08.080), and consistent with South Coast Air Quality Management District Rule 403. Implementation of best management practices would minimize soil entrainment in the air (i.e., fugitive dust) during periods of high wind and in stormwater runoff. In addition, the 2003 Focused EIR contains Mitigation Measures K-1 through K-5 and geotechnical recommendations that apply to the proposed Project. Thus, with incorporation of these mitigation measures, which specify how developments shall comply with grading and erosion control rules and regulations, impacts relating to erosion would be temporary and less than significant. During grading of the Village West Drive extension component of the Project (including the proposed overpass/underpass), potential impacts would be reduced to

below a level of significance through implementation of Mitigation Measure K-3, which requires all future development to use proper erosion control measures during and following construction. Impacts would thus be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-48 and 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- **K-1 through K-5** (See above)

### **3. Geologic Instability**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.5-10 through 4.5-12; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Risk associated with other types of geologic instability (liquefaction, lateral spreading, subsidence, collapsible soils related to the South Campus Specific Plan were determined to be below a level of significance with the implementation of the 2003 Focused EIR mitigation measures K-1 through K-5. Regarding slope instability, the site-specific South Campus Specific Plan geotechnical investigations revealed no indications of slope instability and no evidence of on-site landslides, debris flows, or rock falls. As a result, the South Campus Specific Plan would not be located in an area susceptible to landslides. However, Project grading would result in the creation of cuts up to 15 feet and fill slopes up to 31 feet to create finish site grades. Improper construction of finish cuts and fill slopes could potentially result in slope failure. In addition, the over steepening of temporary slopes during grading and construction could result in slope failure/collapse and improper grading could result in soil collapse during project operations. The environmental analysis in the 2003 Focused EIR included a brief analysis related to this issue and identified mitigation measures K-1 through K-5 to reduce impacts to less than significant. Based on the analysis done specifically for the development planned within the South Campus Specific Plan area, the Project would not result in any changes to or differences from the previously identified impacts associated with the 2003 Approved South Campus. Impacts would be less than significant with mitigation, as the 2003 Focused EIR mitigation measures K-1 through K-5 as well as the new mitigation measure MM-GEO-1 would require that recommendations of a geotechnical report be implemented during design and construction, thus minimizing the potential for landslides/slope instability.



The proposed overpass or underpass across the Village West Drive Extension was evaluated for potential geotechnical impacts in the Final SEIR. The proposed overpass or underpass was determined to be geotechnically feasible. However, additional geotechnical explorations would be required once foundation plans are available. In accordance with MM-GEO-1, design and construction of the proposed overpass or underpass would be required to adhere to any applicable geotechnical recommendations. As such, impacts would be less than significant with mitigation incorporated.

Overall, the proposed Project Impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.5-10 through 4.5-12; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- **K-1 through K-5** (See above)

#### **Mitigation Measure (South Campus Specific Plan component & Village West Drive Extension - Overpass/Underpass only)**

**MM-GEO-1** Prior to the issuance of grading permits, the Project applicant shall submit evidence to the satisfaction of the March Joint Powers Authority (JPA) that all future grading and construction on the Project site shall comply with the geotechnical recommendations contained in the Geotechnical Exploration Update; Proposed Meridian South Campus Phase 1, Tract No. 30857-7, Riverside, California, dated February 11, 2016 (included as Appendix F1 of this Subsequent Environmental Impact Report [SEIR]); Geotechnical Exploration, Proposed Meridian Park South Campus-Phase II, County of Riverside, California, dated September 16, 2019 (included as Appendix F2 of this SEIR); and design-level geotechnical reports. Proposed tentative tract map (i.e., pertaining to grading) and construction approval letters from the March JPA Planning Director constitute evidence that all future grading and construction on the Project site would comply with the applicable geotechnical recommendations.

#### **4. Paleontological Resources**

Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, p. 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The 2003 Focused EIR did not identify the presence of any unique paleontological resources nor were impacts to unique paleontological resources anticipated. Pursuant to the MMRP adopted for the 2003 Focused EIR, the proposed Project would be required to comply with Mitigation Measure L-1 from the 2003 Focused EIR. The Village West Drive extension and the proposed overpass or underpass were not addressed in previous environmental documents for the South Campus Specific Plan. However, the potential for the Village West Drive extension or the proposed overpass/underpass to impact significant, nonrenewable paleontological resources would be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, p. 12-49; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- L-1 (See above)

### **G. GREENHOUSE GAS EMISSIONS**

#### **1. Generation of Greenhouse Gas Emissions**

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

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.6-32 through 4.6-34; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: In the absence of any adopted quantitative threshold, March JPA, as the lead agency, has determined that a project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions identified in threshold GHG-2 (which is shown below under item (2)). Therefore, as analyzed under GHG-2, the South Campus Specific Plan component would comply with applicable reduction plans upon implementation of Mitigation Measures C-1 through C-9, C-12 through C-14, B-5, B-6, B-10, B-11, H-4, H-5, H-7, and K-5 from the 2003 Focused EIR and MM-GHG-1 through MM-GHG-14. The Village West Drive Extension would result in less than significant impacts and would not require mitigation. Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, p. 4.6-32 through 4.6-34)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential GHG impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of GHGs would be generated. As such, the analysis determined that the proposed overpass or

underpass would not result in new or different GHG effects than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan component only)**

- C-1** Preferential parking spaces shall be offered to car pools and van pools.
- C-2** Employers with 250 employees or more shall implement a compressed workweek schedule when feasible.
- C-3** Employers shall develop a trip reduction plan to increase vehicle occupancy.
- C-4** Employers shall provide on-site child care facilities when feasible.
- C-5** Design elements shall be designed to reduce vehicle queuing when entering and exiting parking structures.
- C-6** Projects shall provide for video conferencing facilities to the extent possible.
- C-7** Businesses shall minimize the use of fleet vehicles during smog alerts, and encourage the use of alternative fuel vehicles.
- C-8** Buildings shall be designed to reduce energy usage by utilizing solar or low emissions water heaters, double paned glass windows, using light colored roofing materials, orienting buildings north and increasing wall and attic installation above Title 24 requirements.
- C-9** CEQA Review of stationary source emissions other than natural gas and electricity shall be done on all projects with the possibility of emitting air pollutants. In addition, all projects involving stationary source emissions shall obtain permits to construct and operate from the SCAQMD.
- C-12** A construction relations officer should be appointed to act as a community liaison to oversee on-site construction activity and all emissions and congestion related matters.
- C-13** Restrict idling emission from trucks by using auxiliary power units and electrification at the industrial warehouse facilities
- C-14** Landscape with appropriate drought-tolerant species to

reduce water consumption.

**B-5** The March Business Center shall require implementation of parking ratios that limit the need for on-street parking. These ratios are identified in the Specific Plan.

**B-6** The project shall provide for bicycle facilities to accommodate non-motorized circulation on the site and connectivity to routes in the Cities of Riverside and Moreno Valley.

**B-10** The March JPA shall implement Transportation Demand Management (TDM) strategies to shift trips outside the standard commuting hours and/or to non- “drive alone” modes of travel. This is accomplished through various employer-initiated measures, such as flexible working hours, encouragement of carpooling, and facilitating access for non-motorized (i.e., bicycling and walking) modes of travel. Section V of the Specific Plan outlines TDM requirements.

**B-11** The March JPA shall cooperate with the Riverside Transportation Agency (RTA) for the provision of bus service within the Specific Plan Area.

**H-4** The project applicant shall incorporate the following measures to help reduce the project’s potential solid waste impacts and to help in the County’s effort to comply with State law in diverting solid waste from landfill disposal:

- Green waste generated by the project should be kept separate from other waste types in order that it can be recycled through the practice of grass recycling (where lawn clippings from a mulching type mower are left on the lawn) or onsite composting or directed to local wood grinding and/or composting operations.
- The use of mulch and/or compost in the development and maintenance of landscape areas is recommended.
- Construction and demolition waste should be reduced and/or diverted from landfill disposal by the use of onsite grinders or by directing the materials to recycling facilities.

**H-5** The proposed project shall comply with the State Model

Ordinance, implemented in 9/1/94 in accordance with AB 1327, Chapter 18, California Solid Waste Reuse and Recycling Access Act of 1991, which requires that all commercial, industrial, and multi-family residential projects provide adequate area(s) for the collections and loading of recyclable materials. Prior to building permit issuance, the applicant shall submit a Recyclables Collection and Loading Area plot plan to the March JPA for review and approval.

**H-7** The proposed non-potable water system will meet “Purple” pipe standards for reclaimed water systems.

**K-5** All future development of the project site shall adhere to the Uniform Building Code and State building requirements in effect at the time specific development is proposed.

**MM-GHG-1** Prior to approval of building permits for business park and industrial uses, consistent with the County of Riverside’s Climate Action Plan criteria to install on business park and warehousing buildings or the collective business park and warehousing development such that solar photovoltaic (PV) panels provide 40% of the power needs of the Project, the March Joint Powers Authority (JPA) shall verify that the building plans include solar PV panels, either on site or off site, to provide 40% of the building’s power needs. The March JPA shall verify compliance before issuance of each certificate of occupancy. It is anticipated the Project will install approximately 12-megawatt of solar PV electricity generation. Note: A glare and glint study may be required by March Air Reserve Base for any new solar PV panels.

**MM-GHG-2** Prior to issuance of certificates of occupancy, the March Joint Powers Authority shall verify that the Project shall install Energy Star certified light bulb and light fixtures.

**MM-GHG-3** Prior to issuance of building permits, the Project applicant shall prepare and submit building plans to the March Joint Powers Authority that demonstrate that all new structures shall install duct insulation rated R-6 to a minimum level of; modestly enhanced window insulation rated 0.28 or less U-factor and 0.22 or less SHGC; and Use of enhanced insulation with rigid wall insulation rated R-13 and roof/attic insulation rated R-28 consistent with the County of Riverside’s Climate Action Plan criteria.

**MM-GHG-4** Prior to issuance of building permits and consistent with

the County of Riverside’s Climate Action Plan criteria, the Project applicant shall prepare and submit building plans to the March Joint Powers Authority that demonstrate that all new structures include the following design elements: Construction of modest cool roof, defined as Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance and 0.75 thermal emittance; Use of heating, ventilation, and air conditioning (HVAC) equipment with a season energy efficiency ratio (SEER) of 14 or higher; Installation of blower door HERS verified envelope leakage of equivalent; Installation of water heaters with an energy factor of 0.72 or higher; All rooms shall have some form of daylighting (e.g., skylights or windows); At least 50% of artificial lighting in-unit fixtures shall be high efficiency; Waterless urinals and high efficiency toilets shall be used throughout the Project; and water efficient faucets shall be used throughout the Project.

**MM-GHG-5** Prior to the issuance of building permits, the Project applicant shall prepare and submit building plans to the March Joint Powers Authority that demonstrate that all new structures provide electrical outlets at building exterior areas.

**MM-GHG-6** Prior to the issuance of building permits, the Project applicant shall prepare and submit landscape plans to the March Joint Powers Authority that demonstrate that the landscape non-potable water system shall meet “purple” pipe standards.

**MM-GHG-7** Prior to the issuance of building permits, the Project applicant shall prepare and submit landscape plans to the March Joint Powers Authority that demonstrate that the Project shall exceed the County of Riverside’s Climate Action Plan requirement for water efficient landscaping by having no turf, with the exception of the dog park, and only drought tolerant plants and introducing additional water efficient irrigation controls such as smart irrigation controllers.

**MM-GHG-8** Prior to the issuance of building permits and verified before certificate of occupancy, the Project applicant shall prepare and submit plan to the March Joint Powers Authority that demonstrate the provision of circuitry and capacity for installation of electric vehicle charging stations consistent with the County of Riverside’s Climate Action Plan. Per information provided by the Project Applicant, the Project shall develop 20 charging stations.

**MM-GHG-9** Prior to the issuance of certificates of occupancy, the March Joint Powers Authority shall verify signage installation for 5% of vehicle/employee parking spaces reserved for preferential spaces for carpools and van pools.

**MM-GHG-10** Tenants with more than 10,000 square feet of office space shall provide video conferencing facilities. Tenant spaces below 10,000 square feet may pursue video conferencing as feasible.

**MM-GHG-11** The Project shall provide short- and long- term bicycle parking facilities to meet peak season maximum demand (one bike rack space per 20 vehicle/employee parking spaces).

**MM-GHG-12** Prior to the issuance of building permits, the Project applicant shall prepare and submit building plans to the March Joint Powers Authority that demonstrate the provision of "end-of-trip" facilities including showers, lockers, and changing space (four clothes lockers and one shower provided for every 80-employee parking spaces, separate facilities for each gender for projects with 160 or more employee parking spaces).

**MM-GHG-13** Each tenant shall provide on-site food vending machines or refrigerator, microwave oven, and mail facilities (i.e., drop box) at the Project site. Each tenant with over 5,000 square feet of office space shall provide an on-site computer, internet connection, and other services for personal employee use. Projects shall also consider the provision of an ATM machine as feasible.

**MM-GHG-14** For any warehouse use, the loading docks shall be designed to accommodate SmartWay trucks. The March Joint Powers Authority shall require evidence of compliance prior to issuance of a certificate of occupancy for any warehouse use.

## **2. Generation of Greenhouse Gas Emissions**

Threshold: Would the Project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Finding: Less than significant with mitigation. (Draft SEIR, p. 4.6-35 through 4.6-46; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project would be consistent with Assembly Bill 32, Senate Bill 32, Senate Bill 375, and the County's Climate Action Plan with the

implementation of MM-GHG-1 through MM-GHG-14, which require the South Campus Specific Plan Project to install solar photovoltaic electricity generation; energy-efficient lighting fixtures; duct and window insulation; cool roofs; energy-efficient heating, ventilation, and air conditioning; waterless and high-efficiency toilets and faucets; purple piping; water efficient landscaping and smart irrigation controllers, EV charging stations, preferential parking spaces, bicycle parking facilities, video conferencing facilities; showers, lockers, and changing space; on-site food vending; as well as design SmartWay truck compatible loading docks and provide electrical outlets at exterior of buildings. Thus, the Project's impacts in relation to applicable regulatory plans and policies to reduce GHG emissions would be less than significant with mitigation incorporated. (Draft SEIR, p. 4.6-35 through 4.6-46)

The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for potential GHG impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of GHGs would be generated. As such, the analysis determined that the proposed overpass or underpass would not result in new or different GHG effects than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **Mitigation Measures (South Campus Specific Plan component only)**

- **C-1 through C-9, C-12 through C-14, B-5, B-6, B-10, B-11, H-4, H-5, H-7, and K-5 (See above)**
- **MM-GHG-1 through MM-GHG-14 (See above)**

## **H. HAZARDOUS AND HAZARDOUS MATERIALS**

### **1. Routine Transport, Use, or Disposal of Hazardous Materials**

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

Finding: Less than significant with mitigation (Draft SEIR, Appendix A, pp. 12-51, 12-52, and 12-54; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project applicant is required to comply with federal, state, and local regulations already outlined in the 2003 Focused EIR. Compliance with all federal, state, and local laws and implementation of Mitigation Measures E-1 and E-2 for the South Campus Specific Plan, as set forth in the adopted MMRP from the 2003 Focused EIR, would ensure that impacts would be less than significant. The proposed changes in the Specific Plan



land uses associated with the proposed Project and the new Village West Drive Extension component would not change or create new hazards to the public through the use, transport, or disposal of hazardous materials. Regarding the proposed overpass or underpass across the Village West Drive Extension, use of the overpass or underpass as a connection for the proposed expansion of the National Cemetery would not result in the use of hazardous materials. During construction, equipment and materials could require the use of hazards such as gasoline or diesel fuel; however, through compliance with existing regulations, no new or different impacts would occur relative to hazards and hazardous materials. Impacts would be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-51, 12-52, and 12-54; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan component only)**

**E-1** No project facilities located within one-quarter mile of the existing school shall store, handle or use toxic or highly toxic gases as defined in the most currently adopted County fire code at quantities that exceed exempt amount as defined in the most currently adopted fire code.

**E-2** Facilities that store, handle or use regulated substances as defined in the California Health and Safety Code 25532 (g) in excess of threshold quantities shall prepare risk management plans (RMP) for determination of risks to the community. If in the event the RMP shows that the facility stores, handles or uses regulated substances in excess of the thresholds described above, the activity will be prohibited.

## **2. Accident or Upset**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-52 and 12-54; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project applicant is required to comply with federal, state, and local regulations already outlined in the 2003 Focused EIR. Compliance with all federal, state, and local laws and implementation of Mitigation Measures E-1 and E-2 for the South Campus Specific Plan, as required from the adopted MMRP from the 2003 Focused EIR, would ensure that impacts would be less than significant. As such, impacts would be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-52 and 12-54; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan component only)**

- **E-1 and E-2** (See above)

#### **3. Hazards Near a School**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-52 and 12-54; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Two schools are located within one-quarter mile of the Project site. However, with incorporation of Mitigation Measure E-1, which imposes limitations on land uses within the South Campus Specific Plan area from using or storing toxic or hazardous materials within one-quarter mile from schools, potential impacts associated with hazardous materials near a school used during construction and operations can be reduced to less than significant levels. As such, impacts would be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-52 and 12-54; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan component only)**

- **E-1** (See above)

#### **4. Public Airports**

Threshold: 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 for people residing or working in the Project area?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-53 and 12-54; Final SEIR, Response to Comment Letter No. 1)

Explanation: The proposed Project site is located within proximity to the March ARB Runway, and is thus subject to the March ARB/IPA Land Use Compatibility Plan. The South Campus Specific Plan component of the Project would be required to comply with Mitigation Measures A-1 through A-2 from the 2003 Focused EIR. Because of the proposed Project's compliance with federal, state, and local regulations, and incorporation of Mitigation Measures A-1 and A-2, which require development within the Clear Zone and Accident Potential Zones I and II to abide by building standards and codes, including height restrictions, restrictions on use, setbacks, population densities, insulation and materials, as outlined in the approved 1998 Air Installation Compatible Use Zone

and compliance with the policies and requirements of the Riverside County Airport Land Use Plan, impacts would be less than significant. Additionally, review and approval by the Riverside County Airport Land Use Commission (ALUC) is required when a project is proposing either a General Plan Amendment, Specific Plan Amendment, or other applicable discretionary actions. As such, impacts would be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-53 and 12-54; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan component only)**

**A-1** Development within the Clear Zone and Accident Potential Zones I and II will abide by building standards and codes, including height restrictions, restrictions on use, setbacks, population densities, insulation and materials, as outlined in the approved 1998 Air Installation Compatible Use Zone (AICUZ).

**A-2** As established in the Specific Plan, the project will comply with the policies and requirements of the Riverside County Airport Land Use Plan. Development plans will be submitted to the FAA for the review in accordance with FAR Section 77.13.2.i. Additional ALUC review will be required for objects taller than 50 feet in the Height Caution Zone shown on Figure IV.A-4 (of the 2003 EIR). Other land use controls (relating to safety (both in the air and on the ground) and noise) have been developed in consultation with the ALUC, and have been incorporated into the Specific Plan.

## **I. HYDROLOGY AND WATER QUALITY**

### **1. Violate Standards/Degrade Water Quality**

Threshold: Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.8-19 through 4.8-23; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

Explanation: The 2003 Focused EIR concluded that water quality impacts would be reduced to less than significant levels with incorporation of water quality-related mitigation measures F-1 through F-3. Compliance with the March JPA Water Quality Management Plan Document, as well as implementation of a site-specific Storm Water Pollution Prevention Plan, Low Impact Development features, and Water Quality Management Plans (per MM-HYD-1), and drainage requirements (per MM-HYD-2) would ensure that degradation of water quality (surface and ground) would

remain minimal and that the proposed South Campus Specific Plan would meet all waste discharge requirements. Similar to the conclusions within the 2003 Focused EIR for the 2003 Approved South Campus, impacts are considered less than significant with mitigation.

(Draft SEIR, pp. 4.8-19 through 4.8-23; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

**Mitigation Measures (South Campus Specific Plan component only)**

- F-1** Detention basins and improvements to the storm drain system shall be constructed to reduce peak flows to less than those associated with existing conditions in accordance with the approved Drainage Plan.
  
- F-2** The storm drain system shall include sediment basins near inlets to the system to intercept sediment in accessible areas where maintenance is practical.
  
- F-3** Activities requiring authorization under an NPDES permit shall not be conducted prior to authorization by the Santa Ana Regional Water Quality Control Board. Best management practices identified in the Storm Water Pollution Prevention Plan shall be implemented.

**MM-HYD-1 Water Quality Management Plan.** Consistent with DRC Engineering's Master Project Specific Water Quality Management Plan, Master Meridian Business Park Project, South Campus - Phase II (Appendix II) for the northwestern part of the Project site, prior to issuance of a grading permit for any individual project development, a Water Quality Management Plan (WQMP) shall be developed, to the satisfaction of the March Joint Powers Authority (JPA), for individual projects proposed as part of the South Campus Specific Plan that are currently not covered under an existing WQMP. Regions currently not covered under a WQMP include the southwest, central, and eastern portions of the South Campus Specific Plan (Figure 4.8-1). In accordance with the March JPA's guidance, future implementation projects will need to meet the requirements of the Santa Ana Municipal Separate Storm Sewer System (MS4) Permit, as well as the County of Riverside Water Quality Management Plan Guidance Document (County of Riverside 2012), such that the WQMP shall demonstrate that post-construction low-impact development (LID) best management practices (BMPs) are incorporated into the specific proposed project design and that these features would effectively reduce

and/or eliminate water pollution caused by runoff flowing from developed sites into nearby receiving waters. LID Retention BMPs (infiltration only or harvest and use) shall be used unless it can be demonstrated that those BMPs are infeasible. Projects shall follow the LID hierarchy of infiltration, harvest and reuse, and biotreatment when selecting the final LID for the development. In addition, source control BMPs shall be implemented whenever possible.

**MM-HYD-2 Hydrology/Drainage Study.** Consistent with DRC Engineering, Inc.'s, Preliminary Hydrology Study, for: the Meridian Park South Campus Phase II (Appendix I2), for the northwestern portion of the Project site, prior to issuance of a grading permit for any individual project development, a Hydrology/Drainage Report shall be developed, to the satisfaction of the March Joint Powers Authority, for individual projects proposed within the South Campus Specific Plan area currently not covered under an existing Hydrology/Drainage Report. Regions currently not covered under a Hydrology/Drainage Report include the southwest, central and eastern segments of the South Campus Specific Plan (Figure 4.8-1). In accordance with the Riverside County Hydrology Manual, the Hydrology/Drainage Report shall demonstrate that stormwater runoff flow volume or flow rate, associated with specific projects, would be less than or equal to existing conditions to prevent on- and off-site runoff and flooding. The Hydrology/Drainage Report shall comply with the Riverside County Flood Control and Water Conservation District Manual (RCFCWCD 1978) for storm drain planning and design calculations.

## 2. Groundwater Supply

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.8-23 through 4.8-26; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: *Groundwater Recharge.* While development would increase the number of impervious surfaces, the South Campus Specific Plan would be designed with 141.2 acres of pervious open space/parks, or 22% of the development, providing potential groundwater recharge. However, soils and geologic units underlying the South Campus Specific Plan area are not conducive to substantial groundwater recharge, and the South Campus

Specific Plan Project site is not currently used for recharge, nor is it designated for such use in the future. The 2003 Focused EIR determined that impacts would be less than significant with implementation of Mitigation Measures F-1 through F-3. For the reasons described above, and upon implementation of mitigation measures F-1 through F-3, impacts of the South Campus Specific Plan component of the Project would be less than significant with mitigation incorporated. Regarding the Village West Drive Extension, including the area of the proposed overpass or underpass, this area is unpaved and pervious under existing conditions. Once developed, the paved roadway would incrementally increase the amount of impervious surfaces in the area. Based on the relatively small area of the paved roadway with respect to regional groundwater recharge, the proposed roadway extension and overpass or underpass would not substantially interfere with groundwater recharge. Impacts would be less than significant.

Overall, proposed Project impacts to groundwater would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.8-19 through 4.8-23; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **Mitigation Measures (South Campus Specific Plan component only)**

- **F-1 through F-3** (See above)

### **3. Erosion or Siltation**

Threshold: 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 result in substantial erosion or siltation on- or off-site?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.8-26 through 4.8-28; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

Explanation: Development of the South Campus Specific Plan component of the Project could result in result in increased runoff rates and associated off-site erosive scour and sedimentation of downstream water bodies. However, impacts would be reduced to less than significant with incorporation of Mitigation Measures F-1 through F-3 from the 2003 Focused EIR, which require construction of downstream regional detention basins. Implementation of MM-HYD-2 would ensure that stormwater runoff flow volume or flow rate would be less than or equal to existing conditions, which would prevent on-site and off-site runoff. As such, impacts associated with the South Campus Specific Plan would be less than significant with mitigation incorporated.

Overall, proposed Project impacts would be less than significant with

mitigation incorporated. (Draft SEIR, pp. 4.8-26 through 4.8-28; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

#### **Mitigation Measures (South Campus Specific Plan component only)**

- **F-1 through F-3** (See above)
- **MM-HYD-2** (See above)

#### **4. On-Site of Off-Site Flooding**

Threshold: 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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

Finding: Less than significant with mitigation. (Draft SEIR, p. 4.8-28; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

Explanation: Stormwater runoff would increase as a result of increased impervious surfaces within the South Campus Specific Plan Area, but impacts would be reduced to less than significant levels with incorporation of Mitigation Measures F-1 through F-3 (which require construction of downstream regional detention basins) and MM-HYD-2, which would ensure that stormwater runoff flow volume or flow rate would be less than or equal to existing conditions, preventing on-site and off-site flooding. As such, impacts associated with the South Campus Specific Plan would be less than significant with mitigation incorporated.

Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, p. 4.8-28; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

#### **Mitigation Measures (South Campus Specific Plan component only)**

- **F-1 through F-3** (See above)
- **MM-HYD-2** (See above)

#### **5. Stormwater Drainage Capacity**

Threshold: 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 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?

Finding: Less than significant with mitigation. (Draft SEIR, p. 4.8-29; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

Explanation: Stormwater runoff would increase as a result of increased impervious surfaces within the South Campus Specific Plan Area, but impacts would be reduced to less than significant levels with incorporation of Mitigation Measures F-1 through F-3 (requiring construction of downstream regional detention basins), as well as MM-HYD-1, and MM-HYD-2. MM-HYD-1 would ensure that development within the South Campus Specific Plan area would incorporate low impact development strategies to reduce and/or eliminate water pollution. MM-HYD-2 would ensure that stormwater runoff flow volume or flow rate would be less than or equal to existing conditions, thereby preventing exceedances in stormdrain capacity. Impacts associated with the South Campus Specific Plan would thus be less than significant with mitigation incorporated.

Once constructed, the proposed Village West Drive Extension would divert stormwater runoff from the adjacent undeveloped area to the west beneath the roadway through several storm drain culverts. Stormwater runoff within the roadway would be diverted along the paved roadway and into either the existing or new gutters and storm drain culverts. Regarding the proposed overpass or underpass, through compliance with existing regulations pertaining to drainage (during both construction and operation) any potential changes to the terrain would capture drainage and properly flow surface and stormwater to catch basins and the existing drainage system. Impacts would be less than significant.

Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, p. 4.8-29; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

#### **Mitigation Measures (South Campus Specific Plan component only)**

- **F-1 through F-3** (See above)
- **MM-HYD-1 and MM-HYD-2** (See above)

## **6. Impede or Redirect Flood Flows**

Threshold: 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 create or contribute runoff water which would impede or redirect flood flows?

Finding: Less than significant with mitigation. (Draft SEIR, p. 4.8-29; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The risk of flooding on site was determined to be very low, and the



proposed Project would not impede or redirect flood flows. Flooding impacts associated with the South Campus Specific Plan would be less than significant with incorporation of Mitigation Measures F-1 through F-3. Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, p. 4.8-29; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan component only)**

- **F-1 through F-3** (See above)

**7. Inundation**

Threshold: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?

Finding: Less than significant with mitigation. (Draft SEIR, p. 4.8-30; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The risk of flooding on site would be very low. The South Campus Specific Plan area is not located in proximity to the Pacific Ocean and is not located in proximity to a standing body of water. The nearest standing body of water is the Perris Reservoir, located approximately 5.4 miles to the southeast of the Specific Plan area. As such, the proposed Specific Plan would not be subject to inundation by tsunami or seiche. In addition, the South Campus Specific Plan area is not located within a Dam Hazard Zone. Overall, flooding impacts associated with the South Campus Specific Plan would be less than significant with incorporation of Mitigation Measures F-1 through F-3. Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, p. 4.8-30; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan component only)**

- **F-1 through F-3** (See above)

**8. Water Quality Control Plan / Sustainable Groundwater Management Plan**

Threshold: Would the Project conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.8-30 and 4.8-31 Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

Explanation: Compliance with the March JPA Water Quality Management Plan Document, as well as implementation of a site-specific Stormwater Pollution Prevention Plan, Low Impact Development features, and Water Quality Management Plans would ensure that degradation of water quality

(surface water and groundwater) would remain minimal and that the proposed South Campus Specific Plan would meet all waste discharge requirements. Impacts from the South Campus Specific Plan related to water quality control plans are considered less than significant after mitigation (MM-HYD-1 and MM-HYD-2). With respect to groundwater management, the groundwater basins that would provide a portion of the Project's potable water supply are mostly adjudicated and therefore currently managed under Court-appointed oversight (Watermasters). Those portions of the basins that are outside of the adjudications are expected to be addressed in forthcoming groundwater supply plans. Further, the South Campus Specific Plan is not a known recharge site nor designated for such use in the future. Because the South Campus Specific Plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, impacts would be less than significant.

With regard to the Village West Drive Extension, demolition and construction of the Village West Drive Extension would be confined to the proposed roadway boundaries, and would include demolition of the existing road and an abandoned aboveground water tank located within the roadway right-of-way. A SWPPP would be required to minimize construction impacts to water quality. Once constructed, the proposed roadway would divert stormwater to flow along the paved roadway and into either the existing or new gutters and storm drain culverts, rather than into the neighboring properties, resulting in beneficial impacts. Regarding the proposed overpass/underpass, through compliance with existing regulations pertaining to drainage, during both construction and operation, any potential changes to the terrain would capture drainage and properly flow surface and stormwater to catch basins and the existing drainage system.

Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.8-30 and 4.8-31; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1; Final SEIR, Chapter 3.0)

#### **Mitigation Measures (South Campus Specific Plan component only)**

- **MM-HYD-1 and MM-HYD-2** (See above)

## **J. LAND USE AND PLANNING**

### **1. Land Use Plan Consistency**

Threshold: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.9-8 through 4.9-22; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The SEIR presents a consistency analysis that demonstrates consistency of the South Campus Specific Plan component of the Project with March JPA General Plan goals. With implementation of the mitigation measures identified throughout the SEIR to reduce the environmental impacts of South Campus Specific Plan implementation, this component of the Project was deemed consistent with the March JPA General Plan. Impacts are therefore considered less than significant with implementation of MM-AQ-1 through MM-AQ-18, MM-BIO-1 through MM-BIO-4, MM-GEO-1, MM-GHG-1 through MM-GHG-14, MM-HYD-1 and MM-HYD-2, MM-NOI-1, and MM-TRA-1 through MM-TRA-3. Additionally, implementation of mitigation measures A-1, A-2, and A-4 would ensure compliance with airport planning policies. After implementation of A-1, A-2, and A-4, the South Campus Specific Plan component of the Project would be consistent with the March JPA Development Code. Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.9-8 through 4.9-22; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan component only)**

- **A-1 and A-2** (See above)
- **MM-AQ-1 through MM-AQ-18** (See below)
- **MM-BIO-1 through MM-BIO-4** (See above)
- **MM-GEO-1** (See above)
- **MM-HYD-1 and MM-HYD-2** (See above)
- **MM-NOI-1** (See below)
- **MM-TRA-1 through MM-TRA-3** (See below)

*and*

**A-4** Project detention basins shall have the following features to limit bird activity:

1. The basin shall drain within a six-hour period to reduce the potential for plant growth.
2. Regular maintenance activities shall include the removal of vegetation with the exception of lot 49.
3. Detention basins shall be monitored regularly to determine if they attract waterfowl or other birds.

4. A plan to discourage bird activity shall be implemented if the basins are found to be an attraction to birds.

**K. NOISE**

**1. Increase in Ambient Noise Levels**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.10-23 through 4.10-68; Final SEIR, Chapter 2.0, Response to Comment Letter Nos. 1 and 6)

Explanation: *Construction.* The quantification of construction-related noise levels for the proposed Project concludes that construction noise levels resulting from the Project would be less than significant. However, mitigation measure J-2 from the 2003 Focused EIR would continue to be required for the Project and would ensure that all construction equipment would have mufflers. Additionally, to further reduce the potential for nighttime noise impacts, mitigation measure MM-NOI-1 would be applied to the Project. This measure requires that if construction commences before the allowed construction commencement hour (7:00 a.m.) or on a Sunday, unless directed by an inspector or prior permission is obtained, the March JPA can impose the following monetary penalty: \$10,000 for the first violation, \$15,000 for the second violation, and \$20,000 for the third violation. As such, the proposed Project's noise impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.10-59 through 4.10-68)

*Operations.* The Project would generate daytime and nighttime operational noise level increases ranging from 0.0 to 2.7 dBA noise equivalent level ( $L_{eq}$ ) at the nearby receiver locations. These operational noise level contributions are below the applicable operational noise level significance criteria, as presented in the SEIR. As such, impacts would be less than significant. However, mitigation measures J-3 through J-7 from the 2003 Focused EIR would continue to be required for the Project and would ensure that the Project would maintain less-than-significant noise impacts throughout operations. Additionally, mitigation measures MM-TRA-2 and MM-TRA-3 would reduce traffic-related noise effects, particularly effects of operational truck traffic on surrounding neighborhoods. Impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.10-23 through 4.10-59; Final SEIR, Chapter 2.0, Response to Comment Letter No. 6)

*Proposed Overpass/Underpass.* The proposed overpass or underpass constructed across the Village West Drive Extension was evaluated for

potential noise impacts as part of the Final SEIR. While construction of the proposed overpass or underpass would result in temporary construction impacts, once operational, because no new traffic would be generated, no new sources of impacts to noise would be generated. As such, the analysis determined that the proposed overpass or underpass would not result in new or different noise effects than those identified in the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- J-2** All construction equipment used for construction activities shall be fitted with exhaust muffling and noise control filter devices to reduce noise impacts.
- J-3** Information and location of noise sensitive receptors shall be reviewed and updated by March JPA staff to ensure that all sensitive receptors that may be affected by the long-term implications of the proposed Specific Plan are identified. These sensitive receptors shall including the existing school.
- J-4** Building setbacks and methods of sound attenuation shall be considered and used where appropriate with specific development proposals in the planning area to limit stationary and vehicular long-term noise impacts upon sensitive noise receptors.
- J-6** Industrial and noise sensitive receptors (residential, schools, churches, hospitals, libraries, and senior housing) will be separated sufficiently to reduce the noise impact to sensitive receptors to an insignificant level.
- J-7** Separate residential uses and truck routes so that noise impacts will be contained without unnecessary lengthening truck trips.
- MM-NOI-1** Unless directed by an inspector or prior permission is obtained, if the proposed Project commences construction before the allowed construction commencement hour (7:00 a.m.) or commences construction on a Sunday, the March Joint Powers Authority can impose the following monetary penalty: \$10,000 for the first violation, \$15,000 for the second violation, and \$20,000 for the third violation.
- MM-TRA-2** To address trucks turning left from Coyote Bush Road onto Van Buren Boulevard, the March Joint Powers Authority shall adopt a new monetary fine schedule that imposes a

penalty of \$2,000 for the first violation, \$5,000 for the second violation, and \$10,000 for the third violation.

**MM-TRA-3** Upon approval from the County of Riverside, the proposed Project shall install two display signs (one in each direction) on Van Buren Boulevard that flash a driver's speed and flash "slow down" to drivers who are exceeding the allowed speed.

## **L. RECREATION**

### **1. Construction/Expansion of Recreational Facilities**

Threshold: Would the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.11-5 through 4.11-7; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The South Campus Specific Plan component would involve construction of a dog park and a paseo, which are considered recreational facilities. Impacts associated with the overall construction of the proposed Project, including the dog park and paseo, could result in potentially significant impacts related to air quality, biological resources, geology and soils, and hydrology and water quality. All other potential construction impacts would be less than significant. However, the construction of the 6.2-acre dog park and paseo does not constitute a substantial component of the identified impacts associated with the overall construction of the proposed Project. Therefore, impacts associated with construction of the dog park and paseo are less than significant. Although the construction of the proposed dog park and paseo would result in less-than-significant impacts, as part of the overall Project, the following mitigation measures would be applicable to construction: MM-AQ-1 through MM-AQ-4, MM-BIO-1 through MM-BIO-4, MM-GEO-1, and MM-HYD-1 and MM-HYD-2. Operational impacts would be less than significant.

Overall, proposed Project impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.11-5 through 4.11-7; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **Mitigation Measures (South Campus Specific Plan component only)**

- **MM-AQ-1 through MM-AQ-4** (See below)
- **MM-BIO-1 through MM-BIO-4** (See above)
- **MM-GEO-1** (See above)

- **MM-HYD-1 and MM-HYD-2** (See above)

## **M. TRANSPORTATION**

### **1. Conflict with Plans**

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

Finding: Less than significant with mitigation. (Draft SEIR, p. 4.12-33 through 4.12-63; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: *Operations.* The South Campus Specific Plan component would be required to adhere to mitigation measures B-1 through B-12 from the 2003 Focused EIR, which would reduce transportation impacts and would ensure consistency with applicable plans and policies. Additionally, the proposed Project as a whole was evaluated for its potential to conflict with programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The proposed Project would not have an impact to alternative transportation facilities, and no impacts would occur involving conflicts with plans or policies for transit, bicycle, or pedestrian facilities. The proposed Project was determined to be consistent with the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy. In considering whether the proposed Project would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, the SEIR presents an analysis of the Project's potential effects relative to the operational and General Plan consistency used by the March JPA and the cities or agencies that have jurisdiction over each of the study intersections. However, in accordance with CEQA Guidelines Section 15064.3(a), level of service is not used as a metric to identify transportation impacts under CEQA. Therefore, the proposed Project transportation impacts related to the March JPA and other agencies' General Plans would be less than significant.

Overall, upon incorporation of Mitigation Measures B-1 through B-12 identified in the 2003 Focused EIR (for the South Campus Specific Plan component of the Project) and upon compliance with PDF-TRA-1 (for the South Campus Specific Plan component and the Village West Drive Extension component, including the proposed overpass/underpass), impacts would be less than significant with mitigation. (Draft SEIR, p. 4.12-33 through 4.12-63; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan component only)**

- B-1** The project shall contribute on a fair share basis toward the improvements identified in the Cumulative Impacts paragraph of Section IV.B of the 2003 Focused EIR.
- B-2** The project shall construct the transportation improvements identified in Figure IV.B-5 through IV.B-7 (see Section IV.B of the 2003 Focused EIR). To the extent that such improvements provide capacity benefits for local or regional (i.e., non-project) demand, the project is eligible for credits toward its contribution toward local and/or regional transportation impact fees, if any.
- B-3** March Business Center traffic volumes shall be monitored periodically to assure that the transportation infrastructure provides sufficient capacity to serve project volumes. Traffic monitoring shall occur at a minimum of five-year intervals.
- B-5** The March Business Center shall require implementation of parking ratios that limit the need for on-street parking. These ratios are identified in the Specific Plan.
- B-6** The project shall provide for bicycle facilities to accommodate non-motorized circulation on the site and connectivity to routes in the Cities of Riverside and Moreno Valley.
- B-7** March Business Center shall provide truck routes on internal roadways to limit impacts of trucks on adjacent residential communities.
- B-8** The project shall construct internal roadways in accordance with the County Road Improvement Standards and Specifications with additional landscaping as identified in the Riverside County Integrated Project (RCIP).
- B-10** The March JPA shall implement Transportation Demand Management (TDM) strategies to shift trips outside the standard commuting hours and/or to non- “drive alone” modes of travel. This is accomplished through various employer-initiated measures, such as flexible working hours, encouragement of carpooling, and facilitating access for non-motorized (i.e., bicycling and walking) modes of travel. Section V of the Specific Plan outlines TDM requirements.
- B-11** The March JPA shall cooperate with the Riverside Transportation Agency (RTA) for the provision of bus service within the Specific Plan Area.
- B-12** Signage shall be provided at the Van Buren Boulevard intersections with Coyote Bush Road and Orange Terrace



to discourage truck traffic on residential streets in the Orangecrest Development. Furthermore, the March JPA, as a responsible party, shall encourage the City of Riverside and Riverside County to review and consider appropriate legislation to eliminate or curtail truck traffic, exempting local deliveries, on Alessandro Boulevard and Van Buren Boulevard west of the March Business Center Development.

## **2. Design Features and Incompatible Uses**

Threshold: 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)?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.12-65 through 4.12-70; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed South Campus Specific Plan Project component would introduce truck trips to the area, which could be an incompatible use. However, Mitigation Measure B-12 (from the 2003 Focused EIR) and MM-TRA-2 would be implemented to preclude truck traffic from nearby residential neighborhoods. Additionally, MM-TRA-3 would be implemented to address potential excessive roadway speeds on Van Buren Boulevard. MM-TRA-3 would require display signs on Van Buren Boulevard that flash drivers' speeds and flash "slow down" when speed limits are exceeded. The proposed South Campus Specific Plan Project component may also cause vehicle queues at the I-215 off ramps near the Project site, which could lead to "spill back" onto the I-215 mainline. However, calculations presented in the SEIR demonstrate that the anticipated vehicle queues would be accommodated by the turning lane's available storage length. There are no queuing issues anticipated in associated with the Project.

The proposed overpass or underpass that would be constructed across the Village West Drive Extension was evaluated for transportation impacts as part of the Final SEIR. The analysis determined that the proposed overpass or underpass would not result in new or different transportation effects than those identified in the Draft SEIR. The proposed overpass or underpass would be utilized specifically and exclusively for funeral processions as part of the planned future National Cemetery expansion. Existing and future traffic across Village West Drive is not anticipated to have access to or utilize the proposed overpass or underpass, and as such, there would be no changes to the transportation analysis and conclusions within the Draft SEIR. (Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Overall, impacts of the proposed Project would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.12-65 through 4.12-70; Final

SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan component only)**

**B-12** (See above)

**MM-TRA-2** To address trucks turning left from Coyote Bush Road onto Van Buren Boulevard, the March Joint Powers Authority shall adopt a new monetary fine schedule that imposes a penalty of \$2,000 for the first violation, \$5,000 for the second violation, and \$10,000 for the third violation.

**MM-TRA-3** Upon approval from the County of Riverside, the proposed Project shall install two display signs (one in each direction) on Van Buren Boulevard which that flash a drivers speed and flash “slow down” to drivers who are exceeding the allowed speed.

**N. TRIBAL CULTURAL RESOURCES**

**1. Tribal Cultural Resources that are Listed or Eligible for Listing on State or Local Registers**

Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code (PRC) section 21074, as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC section 5020.1(k)?

Finding: Less than significant with mitigation. (Draft SEIR, Appendix A, pp. 12-66 and 12-67; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Based on the analysis in the Initial Study, impacts to resources listed or eligible for listing in a state or local register would be below a level of significance upon incorporation of L-1, which would ensure that impacts to tribal cultural resources (TCRs) would be less than significant. Impacts would therefore be less than significant with mitigation incorporated. (Draft SEIR, Appendix A, pp. 12-66 and 12-67; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

- **L-1** (See above)

**2. Tribal Cultural Resources Determined to be Significant by the Lead Agency**

Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource as defined in PRC Section 21074, as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC, Section 5024.1(c)? In applying the criteria set forth in PRC, Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.13-14 and 4.13-15; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: No TCRs have been identified through tribal consultation, and the lead agency has not identified any TCRs within the Project site that would warrant discretionary designation of a resource as a TCR. However, in consideration of the known sensitivity of the Project site for cultural resources, mitigation measures MM-TCR-1 and MM-TCR-2 are included below to provide for archaeological and tribal monitoring for all initial ground-disturbing activities, including cultural/historical sensitivity training. MM-TCR-2 would be implemented in the unlikely event that human remains are encountered. With the implementation of MM-TCR-1 and MM-TCR-2, the Project result in less than significant impact to TCRs. Additionally, Mitigation Measure L-1 from the 2003 Focused EIR would apply and would also ensure that a qualified archaeologist is called upon to survey any archaeological resources that may be encountered during construction. As such, impacts would be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.13-14 and 4.13-15; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

### **Mitigation Measures (South Campus Specific Plan & Village West Drive Extension)**

**L-1** (See above)

**MM-TCR-1** Prior to issuance of a grading permit, the Project Applicant/Developer shall retain a qualified archaeologist (Project Archaeologist) and a Tribal monitor from the Pechanga Band of Luiseño Indians (Tribe) to monitor all initial ground-disturbing activities, including, but not limited to clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition. The Applicant/Developer shall submit a fully executed copy of the contract for the retention of an archaeologist to the Planning Department to ensure compliance. The Applicant/Developer shall also secure an agreement with the Tribe for Tribal monitoring.

The Applicant/Developer shall submit a copy of a signed contract between the above-mentioned Tribe and the land owner/Applicant/Developer for the monitoring of the Project to the Planning Department and to the Engineering Department. The Applicant/Developer is also required to provide a minimum of 30 days advance notice to the Tribe of all mass grading and trenching activities.

Prior to the commencement of ground-disturbing activities, the Project's qualified archaeological Principal Investigator (Principal Investigator), meeting the Secretary of the Interior's Professional Qualification Standards, in consultation with the Tribe, the March JPA, and construction manager, shall develop a cultural resource monitoring and treatment plan (CRMTP) prior to Project commencement. This CRMTP defines the process to be followed, upon discovery of cultural resources, to ensure the proper treatment, evaluation and management of cultural resources in the Project site, should they be encountered during construction.

a. For purposes of CRMTP implementation, the Project area subject to monitoring is defined as:

- All areas within the Project boundary specifically in which ground-disturbing activities (e.g. including, but not limited to clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition) will occur,
- Any on-site or off-site ancillary Project use areas or facility locations are subject to the protocols outlined in the CRMTP. These include, but are not limited to, access roads, yards/support areas, easements, staging areas, and utility tie-ins.

b. The CRMTP shall include a requirement for all construction personnel to complete a Cultural Resources Worker Sensitivity Training (Training) prior to commencement of construction activities. The Training shall be conducted by a qualified archaeologist (Project Archaeologist). The Training shall provide: (1) the types and characteristics of cultural materials that may be identified during construction and explain the importance of and legal basis for the protection of significant cultural resources; (2) proper procedures to follow in the event that cultural resources or human remains are uncovered

during ground-disturbing activities, including procedures for work curtailment or redirection; and (3) protocols for the contact of the site supervisor and archaeological and Tribal monitor upon discovery of a resource. All new construction personnel must take the training prior to beginning ground-disturbing activities.

c. The following protocols shall be included in the CRMTP:

i. The Project Archaeologist and the Tribal monitor shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the Project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition and etc. The Project Archaeologist and the Tribal monitor, shall have the authority to temporarily divert, redirect or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with the March JPA.

ii. If during ground disturbance activities, potential cultural resources are inadvertently discovered, the Project Archaeologist and Tribal monitor shall immediately redirect grading operations in a 100-foot radius around the discovery and the following procedures shall be followed:

1. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Applicant/Developer, the Project's archaeological Principal Investigator, the Tribal representative(s), the Project monitors, and the Planning Director to discuss the significance of the find pursuant to California Public Resources Code Section 21083.2.

2. At the meeting, the significance of the discovery shall be discussed and after consultation with the Project PI, Tribal representative(s), the Project monitors, a decision shall be made, with the concurrence of the Planning Director, as to the appropriate

mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.

3. Grading of further ground disturbance shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation.

4. Treatment and Disposition of the inadvertently discovered cultural resources shall be carried out in one or more of the following methods:

- Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for cultural resources.
- During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the Project Archaeologist. If removal of artifacts from the Project site is necessary, each artifact shall be catalogued, and an inventory will be provided to the Tribal monitor upon each addition. No recordation of sacred items is permitted without the written consent of the Tribe
- Following the completion of the Project, if the cultural resources are determined to be Native American in origin, the Applicant/Developer shall relinquish ownership of all cultural resources that are determined to be of Native American origin to the Tribe.
- If the landowner and the Tribe cannot come to a consensus on the significance or the mitigation for the Native American cultural

resource, these issues will be presented to the March JPA Planning Director (Director) for decision. The Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the Project archaeological PI and shall consider the cultural and religious principles and practices of the Tribe. Notwithstanding any other rights available under the law, the decision of the Director shall be appealable to the March Joint Powers Authority Council.

- Onsite reburial of the discovered items. This shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed.

d. Regardless of discovery, at the completion of all ground-disturbing activities, an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards shall prepare a Monitoring Report and submit said report to the March JPA, the Eastern Information Center (EIC) located at University of Riverside, Riverside and the Pechanga Band of Luiseño Indians Tribal Government. The report will document all monitoring efforts and be completed within 60 days of conclusion of all ground-disturbing activities.

**MM-TCR-2** If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource Code Section 5097.98(b) remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within the period specified

by law (24 hours). Subsequently, the Native American Heritage Commission shall identify the "most likely descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98. Human remains from other ethnic/cultural groups with recognized historical associations to the project area shall also be subject to consultation between appropriate representatives from that group and the Planning Director.

## **O. UTILITIES AND SERVICE SYSTEMS**

### **1. New or Expanded Utilities**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.14-17 through 4.14-22; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Water, sewer, storm drain, electrical, natural gas, and telecommunications infrastructure would be installed within the South Campus Specific Plan area and within the Village West Drive Extension area. The installation of this infrastructure is included as part of the Project and would adhere to all construction best management practices, including the requirements of the Construction General Permit. Regarding wastewater treatment, the analysis in the SEIR determined that adequate capacity is available to serve the Project at existing facilities. Mitigation Measures H-1, H-2, H-3, H-7, and H-8 from the 2003 Focused EIR would be applied to the South Campus Specific Plan component and would ensure that sufficient utilities are installed for the proposed uses within the Specific Plan area in accordance with applicable regulations. Impacts would thus be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.14-17 through 4.14-22; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

#### **Mitigation Measures (South Campus Specific Plan component only)**

**H-1** Provide the extension of utility infrastructure to serve the development, including over-sizing facilities for future needs.

**H-2** Construct the storm drain and flood control facilities, in accordance with the approved March Business Center Drainage Plan and Plan for March JPA Planning Area.



- H-3** All storm drain and flood control facilities shall be approved and operational prior to the issuance of certificates of occupancy for the associated development.
- H-7** The proposed non-potable water system will meet “Purple” pipe standards for reclaimed water systems.
- H-8** A fireflow standard of 4,000 gallons per minute shall be used for the water distribution network.

**2. Solid Waste**

Threshold: 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?

Finding: Less than significant with mitigation. (Draft SEIR, pp. 4.14-25 and 4.14-26; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The proposed Project’s anticipated solid waste generation was analyzed in the SEIR, and the analysis demonstrated that solid waste production would be negligible in a regional context and would not exceed the capacity of local infrastructure. Furthermore, Mitigation Measures H-4 and H-5 from the 2003 Focused EIR would be applied to the South Campus Specific Plan component of the Project and would ensure that solid waste is diverted from landfills to the extent practicable and that the collection of recyclables is facilitated during operations. Impacts would thus be less than significant with mitigation incorporated. (Draft SEIR, pp. 4.14-25 and 4.14-26; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures (South Campus Specific Plan component only)**

**H-4** The project applicant shall incorporate the following measures to help reduce the project’s potential solid waste impacts and to help in the County’s effort to comply with State law in diverting sold waste from landfill disposal:

- Green waste generated by the project should be kept separate from other waste types in order that it can be recycled through the practice of grass recycling (where lawn clippings from a mulching type mower are left on the lawn) or onsite composting or directed to local wood grinding and/or composting operations.
- The use of mulch and/or compost in the development and maintenance of landscape areas is recommended.

- Construction and demolition waste should be reduced and/or diverted from landfill disposal by the use of onsite grinders or by directing the materials to recycling facilities.

**H-5**

The proposed project shall comply with the State Model Ordinance, implemented in 9/1/94 in accordance with AB 1327, Chapter 18, California Solid Waste Reuse and Recycling Access Act of 1991, which requires that all commercial, industrial, and multi-family residential projects provide adequate area(s) for the collections and loading of recyclable materials. Prior to building permit issuance, the applicant shall submit a Recyclables Collection and Loading Area plot plan to the March JPA for review and approval.

**SECTION IV**  
**IMPACTS THAN CANNOT BE FULLY MITIGATED TO A LESS THAN SIGNIFICANT LEVEL**

March JPA hereby finds that, despite the incorporation of Mitigation Measures identified in the SEIR and in these Findings, the following environmental impacts cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

**A. AIR QUALITY**

**1. Conflict with Applicable Plans**

Threshold: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Finding: Significant and unavoidable. (Draft SEIR, pp. 4.2-25 through 4.2-27, and 4.2-51; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The SCAQMD has established criteria for determining consistency with the AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993). Here, the Project conflicts with criterion 1.

- Consistency Criterion No. 1: The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards of the interim emissions reductions specified in the AQMP.

The Project's unmitigated construction and operation would be inconsistent with the first criterion. Thus, unmitigated construction and operation of the Project would result in a potentially significant impact. The Project would be required to comply with Mitigation Measures C-1 through C-14 from the 2003 Focused EIR. However, the 2003 Focused EIR determined that implementation of these mitigation measures would not reduce impacts to a less-than-significant level. As such, additional mitigation measures have been set forth in the Subsequent EIR to further reduce Project impacts. In order to reduce the Project's construction impact to a less-than-significant level (for both the South Campus Specific Plan component and Village West Drive Extension component, including the proposed overpass/underpass), the Project would implement mitigation measures MM-AQ-1 through MM-AQ-4, which require Tier 4 off-road construction equipment, "Super-Compliant" low-volatile organic compound paints, provision of a construction relations officer, and preparation of a fugitive dust control plan. However, even with implementation of MM-AQ-5 through MM-AQ-18, the operational impacts associated with the South Campus Specific Plan would remain significant and unavoidable. The

majority of the Project's operational oxides of nitrogen (NO<sub>x</sub>) emissions are derived from vehicle usage (passenger cars and trucks). Since neither the Project Applicant nor the March JPA have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce emissions to levels that are less than significant. As such, operational impacts for the South Campus Specific Plan component would be significant and unavoidable. (Draft SEIR, pp. 4.2-25 through 4.2-27, and 4.2-51; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures:** The SEIR identifies the following mitigation measures that would reduce impacts to air quality to the extent feasible, but would not fully mitigate all air quality impacts to less than significant levels as explained above:

***South Campus Specific Plan & Village West Drive Extension***

- C-1 Preferential parking spaces shall be offered to car pools and van pools.
- C-2 Employers with 250 employees or more shall implement a compressed workweek schedule when feasible.
- C-3 Employers shall develop a trip reduction plan to increase vehicle occupancy.
- C-4 Employers shall provide on-site child care facilities when feasible.
- C-5 Design elements shall be designed to reduce vehicle queuing when entering and exiting parking structures.
- C-6 Projects shall provide for video conferencing facilities to the extent possible.
- C-7 Businesses shall minimize the use of fleet vehicles during smog alerts, and encourage the use of alternative fuel vehicles.
- C-8 Buildings shall be designed to reduce energy usage by utilizing solar or low emissions water heaters, double paned glass windows, using light colored roofing materials, orienting buildings north and increasing wall and attic installation above Title 24 requirements.
- C-9 CEQA Review of stationary source emissions other than natural gas and electricity shall be done on all projects with the possibility of emitting air pollutants. In addition, all projects involving stationary source emissions shall obtain permits to construct and operate from the SCAQMD.

- C-10** Trucks hauling dirt, sand, gravel or soil are to be covered and should maintain at least two feet of freeboard in accordance with Section 23114 of the California Vehicle Code.
- C-11** Construction access roads to the main roads should be paved to avoid dirt being carried on to the roadway.
- C-12** A construction relations officer should be appointed to act as a community liaison to oversee on-site construction activity and all emissions and congestion related matters.
- C-13** Restrict idling emission from trucks by using auxiliary power units and electrification at the industrial warehouse facilities.
- C-14** Landscape with appropriate drought-tolerant species to reduce water consumption.
- MM-AQ-1** Prior to the issuance of any grading permits, the applicant shall prepare and submit to the March Joint Powers Authority for approval a Construction Management Plan to ensure that off-road diesel construction equipment rated at 50 horsepower or greater, complies with U.S. Environmental Protection Agency and California Air Resources Board (CARB) Tier 4 off-road emissions standards or equivalent, and shall ensure that all construction equipment is tuned and maintained in accordance with the manufacturers' specifications.
- MM-AQ-2** Prior to the issuance of any grading permits, the applicant shall prepare and submit to the March Joint Powers Authority for approval a Construction Management Plan to ensure the Project shall use "super-compliant" low-volatile organic compound (VOC) paints that have been reformulated to exceed the regulatory VOC limits put forth by South Coast Air Quality Management District's Rule 1113. Super-compliant low-VOC paints shall be no more than 10 grams per liter of VOC. Alternatively, the applicant may use tilt-up concrete buildings that do not require the use of architectural coatings.
- MM-AQ-3** The Project shall provide a construction relations officer to act as a community liaison to oversee on-site construction activity and all emissions- and congestion-related matters. A phone number and email contact information for the construction relations officer shall be posted on signage at construction site entrance points.

**MM-AQ-4** Prior to the issuance of any grading permits, the applicant shall prepare and submit to the March Joint Powers Authority for approval a Fugitive Dust Control Plan.

***South Campus Specific Plan component only***

**MM-AQ-5** Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than 5 minutes once the vehicle is stopped, the transmission is set to “neutral” or “park,” and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the issuance of an occupancy permit, March Joint Powers Authority shall conduct a site inspection to ensure that the signs are in place.

**MM-AQ-6** Prior to tenant occupancy, the Project shall provide documentation to March Joint Powers Authority demonstrating that occupants/tenants of the Project site have been provided documentation on funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.

**MM-AQ-7** Prior to the issuing of each building permit, the Project shall provide plans and specifications to the March Joint Powers Authority that demonstrate that each project building is designed for passive heating and cooling and is designed to include natural light. Features designed to achieve this shall include the proper placement of windows, overhangs, and skylights.

**MM-AQ-8** Prior to the issuing of each building permit, the Project shall provide plans and specifications to the March Joint Powers Authority that demonstrate that electrical service is provided to each of the areas in the vicinity of the building that are to be landscaped in order that electrical equipment may be used for landscape maintenance.

**MM-AQ-9** Once constructed, the Project shall ensure that all building tenants shall utilize electric equipment for landscape maintenance to the extent feasible, through requirements in the lease agreements.

**MM-AQ-10** Once constructed, the Project shall ensure that all building tenants shall utilize only electric or natural gas service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment, through requirements in the lease agreements. Electric-powered service yard trucks (hostlers), pallet jacks and forklifts, and other onsite equipment shall also be required instead of diesel-powered equipment, if technically feasible. Yard trucks may be diesel fueled in lieu of electrically or natural gas fueled provided such yard trucks are at least compliant with California Air Resources Board (CARB) 2010 standards for on-road vehicles or CARB Tier 4 compliant for off-road vehicles.

**MM-AQ-11** Upon occupancy, the Project shall require tenants that do not already operate 2010 and newer trucks to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds. If awarded, the tenant shall be required to accept and use the funding. Tenants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Tenants shall also be encouraged to become SmartWay Partners, if eligible. This measure shall not apply to trucks that are not owned or operated by the facility operator or facility tenants since it would be infeasible to prohibit access to the site by any truck that is otherwise legal to operate on California roads and highways.

**MM-AQ-12** Project tenants who employ 250 or more employees on a full- or part-time basis shall comply with South Coast Air Quality Management District (SCAQMD) Rule 2202, On-Road Motor Vehicle Mitigation Options. The purpose of this rule is to provide employees with a menu of options to reduce employee commute vehicle emissions. Project tenants with less than 250 employees or tenants with 250 or more employees who are exempt from SCAQMD Rule 2202 (as stated in the Rule) shall either (a) join with a tenant who is implementing a program in accordance with Rule 2202 or (b) implement an emission reduction program similar to Rule 2202 with annual reporting of actions and results to March Joint Powers Authority. The tenant-implemented program would include, but not be limited to the following:

- Appoint a Transportation Demand Management (TDM) coordinator who would promote the TDM program, activities and features to all employees.
- Create and maintain a “commuter club” to manage

subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work.

- Inform employees of public transit and commuting services available to them (e.g., social media, signage).
- Provide on-site transit pass sales and discounted transit passes.
- Guarantee a ride home.
- Offer shuttle service to and from public transit and commercial areas/food establishments, if warranted.
- Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.

**MM-AQ-13** Prior to the issuance of a building permit, the Project shall provide evidence to March Joint Powers Authority that loading docks are designed to be compatible with SmartWay trucks.

**MM-AQ-14** Upon occupancy and annually thereafter, the Project shall provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding:

- Building energy efficiency, solid waste reduction, recycling, and water conservation.
- Vehicle greenhouse gas emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.
- Participation in the Voluntary Inter-industry Commerce Solutions (VICS) “Empty Miles” program to improve goods trucking efficiencies.
- Health effects of diesel particulates, State regulations limiting truck idling time, and the benefits of minimized idling.
- The importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity.

**MM-AQ-15** Prior to issuance of a building permit, the Project shall provide March Joint Powers Authority with an onsite



signage program that clearly identifies the required onsite circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.

**MM-AQ-16** Prior to issuance of an occupancy permit, the March Joint Powers Authority shall confirm that signs clearly identifying approved trucks have been installed along the truck routes to and from the project site.

**MM-AQ-17** Prior to issuance of an occupancy permit, the Project shall install a sign on the property with telephone, email, and regular mail contact information for a designated representative of the tenant who would receive complaints about excessive noise, dust, fumes, or odors. The sign shall also identify contact data for the March Joint Powers Authority for perceived Code violations. The tenant's representative shall keep records of any complaints received and actions taken to communicate with the complainant and resolve the complaint. The tenant's representative shall endeavor to resolve complaints within 24 hours.

**MM-AQ-18** Prior to issuance of a building permit, the Project shall provide the March Joint Powers Authority with project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. The calculations shall be based on reasonable predictions from currently available truck manufacturer's data. Electrical system upgrades that exceed reasonable costs shall not be required.

## **2. Cumulatively Considerable Increase In Pollutants**

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

Finding: Significant and unavoidable. (Draft SEIR, pp. 4.2-27 through 4.2-34, and 4.2-51; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: The Project would be required to comply with Mitigation Measures C-1 through C-14 from the 2003 Focused EIR. However, the 2003 Focused EIR determined that implementation of these mitigation measures would not reduce impacts to a less-than-significant level. As such, additional Project analysis has been conducted, and mitigation measures have been set forth in the Subsequent EIR in order to further reduce Project impacts.

Operational emissions from implementation of the South Campus Specific Plan component would exceed regional thresholds of significance established by the SCAQMD for NO<sub>x</sub> emissions, resulting in a potentially significant impact. Even with implementation of MM-AQ-5 through MM-AQ-18 (which require the Project to reduce idling at loading docks, provide incentives for cleaner engines and equipment, optimize natural lighting, provide electric outlets on the exterior of buildings, utilize electric landscaping equipment, utilize electric and natural gas-fueled yard equipment (e.g., forklifts, hostlers), encourage use of alternative-fueled trucks and retrofitted diesel trucks, implement a transportation demand management program, design SmartWay truck compatible loading docks, mark approved truck routes, and prove electrical system supports heavy truck charging) impacts remain significant and unavoidable. The majority of the Project's operational NO<sub>x</sub> emissions are derived from vehicle usage (passenger cars and trucks). Since neither the Project Applicant nor the March JPA have regulatory authority to control tailpipe emissions, no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant. As such, operational impacts of the South Campus Specific Plan component would be significant and unavoidable. (Draft SEIR, pp. 4.2-27 through 4.2-34, and 4.2-51; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures:** The SEIR identifies the following mitigation measures that would reduce impacts to air quality to the extent feasible, but would not fully mitigate all air quality impacts to less than significant levels as explained above:

***South Campus Specific Plan & Village West Drive Extension***

- C-1 through C-14 (See above)
- MM-AQ-1 through MM-AQ-4 (See above)

***South Campus Specific Plan component only***

- MM-AQ-5 through MM-AQ-18 (See above)

**B. TRANSPORTATION**

**1. Vehicle Miles Traveled**

Threshold: Would the Project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Finding: Significant and unavoidable. (Draft SEIR, pp. 4.12-63 through 4.12-65; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

Explanation: Even with implementation of feasible Transportation Demand Management (TDM) measures (per MM-TRA-1), vehicle miles traveled (VMT)

associated with the South Campus Specific Plan component of the Project cannot be reduced to levels that would be below applicable significance thresholds, as presented in the SEIR. The efficacy of TDM measures and reduction of VMT impacts below thresholds cannot be assured. Therefore, impacts associated with the South Campus Specific Plan component would be significant and unavoidable. The Village West Drive Extension (including the proposed overpass/underpass) would not involve significant VMT impacts; as such, impacts associated with that component would be less than significant.

Overall, proposed Project impacts would be significant and unavoidable. (Draft SEIR, pp. 4.12-63 through 4.12-65; Final SEIR, Chapter 2.0, Response to Comment Letter No. 1)

**Mitigation Measures:** The SEIR identifies the following mitigation measures that would reduce impacts to air quality to the extent feasible, but would not fully mitigate all air quality impacts to less than significant levels as explained above:

***South Campus Specific Plan component only***

**MM-TRA-1 VMT Reduction.** The Project applicant shall submit a Transportation Demand Management (TDM) plan prepared by a qualified transportation consultant acceptable to the March Joint Powers Authority (JPA) to reduce vehicle miles traveled. The TDM plan shall be approved by the March JPA prior to the issuance of the first occupancy permit. The TDM plan shall apply to Project tenants through tenant leases. The TDM plan shall discourage single-occupancy vehicle trips and encourage alternative modes of transportation such as carpooling, taking transit, walking, and biking. Examples of trip reduction measures may include, but are not limited to:

- Transit passes
- Car-sharing programs
- Telecommuting and alternative work schedules
- Ride sharing programs

## SECTION V MANDATORY CEQA TOPICS

CEQA Guidelines Section 15126.2(b) directs EIRs to address impacts from a project that will result in significant impacts, including those that cannot be mitigated below a level of significance. A summary of all the environmental issue areas and the resultant significance and listing of mitigation measures is found in Section II, Section III, and Section IV of this document. To summarize, the following issue areas would result in significant impacts even after mitigation measures have been incorporated, thus resulting in unavoidable impacts:

- Air Quality – operational (Draft SEIR, p. 5-2)
- Transportation (Draft SEIR, p. 5-2)

CEQA Guidelines mandate that the SEIR must address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (14 CCR 15126(c)). An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources.
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses.
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project.
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. Construction of each of the Project components would result in the use of nonrenewable resources and energy sources, including fossil fuels, natural gas, and electricity, as further discussed in Section 4.4 of the Draft SEIR. Fossil fuels would be used to power construction equipment and delivery and construction employee vehicles. Construction equipment would also use electricity and natural gas. Use of these energy sources would be considered a permanent commitment of resources. In addition, a variety of resource materials would be used during the construction process, including steel, wood, concrete, and fabricated materials. Once these materials and fuels are used for purposes of construction, the commitment of such materials and fuels would be considered irreversible. However, the proposed Project, when taking into consideration the global use of these materials, would not result in a large commitment of these resources.

Once operational, the Project components would consume more energy on a daily basis than is currently consumed on the Project site; however, the proposed Project would result in a net reduction of electricity and natural gas consumption when compared to the consumption estimates associated with the 2003 Approved South Campus. Since the certification of the 2003 Focused EIR, as detailed in Section 4.4, Energy, of the Draft SEIR, a number of federal and state

regulations have been adopted that require the use of renewable resources. For example, Southern California Edison receives electric power from a variety of sources, including 36% from renewable sources. As such, a portion of the electricity used would be provided by renewable sources. The industrial facilities within the South Campus would use nonrenewable energy resources, such as natural gas and petroleum, which would be an irreversible commitment of such resources. However, the Project would be a relatively minor energy consumer compared to other local and regional users, as demonstrated in the Draft SEIR. For these reasons, the Project's operational consumption of nonrenewable resources would not be considered a significant irreversible environmental effect. (Draft SEIR, p. 5-3)

## **SECTION VI** **CUMULATIVE IMPACTS**

Chapter 4.0 of the Draft SEIR (specifically, Table 4-1) includes a list of past, present and reasonably foreseeable future projects in order to conduct the cumulative impacts analysis. The resulting cumulative impacts analysis is presented throughout Chapter 4, at the end of each environmental category (Draft SEIR, pp. 4-3 through 4-4).

### **A. AESTHETICS**

March JPA concludes that the Project would not result in cumulatively considerable impacts to aesthetics. The Project would comply with the March Business Center Specific Plan Development Regulations and Design Guidelines to ensure visual compatibility. Development standards include site area, lot dimensions, building height, building setbacks, and parking requirements in order to establish the relationship between building mass and scale. While Project implementation would change the immediate area's visual character, the larger visual context east and south of the Project site includes a mixture of uses, including residential, recreational, business park, and industrial warehouse development. As stated previously, the Project would be consistent with the larger visual context of the surrounding area. Similarly, the related projects would introduce a mixture of industrial, business park, and mixed-use land uses. Development of the related projects would contribute to the overall character and quality of the surrounding area once developed. Building materials, bulk, scale, and setbacks for each cumulative project would be required to comply with their applicable jurisdiction's (i.e., March JPA, City of Riverside, County of Riverside, City of Moreno Valley) development standards and guidelines regarding visual character. Compliance with each jurisdiction's General Plan, Municipal Code, and any specific plans as it relates to design standards and scenic quality would minimize potential impacts of incompatibility with existing character or quality. As such, implementation of the proposed Project, in addition to the identified related projects, would not result in cumulatively considerable impacts to visual character. (Draft SEIR, pp. 4.1-6 and 4.1-7)

### **B. AIR QUALITY**

March JPA concludes that the Project would result in cumulatively considerable impacts to air quality. Air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the SCAQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used by the SCAQMD to determine whether a project's individual emissions would have a cumulatively significant impact on air quality. Because the Project would exceed the project-level thresholds for regional NO<sub>x</sub> emissions during operation even after implementation of the air quality mitigation measures identified above, the Project's cumulative impacts with respect to air quality would be considerable and significant. (Draft SEIR, p. 4.2-51)

### **C. BIOLOGICAL RESOURCES**

March JPA concludes that the Project would not result in cumulatively considerable impacts to biological resources. Given that Project-specific impacts to biological resources are less than significant with mitigation incorporated, the proposed Project (both the South Campus

Specific Plan and the Village West Drive Extension components) would not create or contribute to a significant cumulative impact with respect to biological resources. Mitigation measures as described above would ensure that impacts would not be cumulatively considerable. (Draft SEIR, pp. 4.3-36 and 4.3-37)

**D. ENERGY**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of energy. Cumulative projects that could exacerbate the proposed Project's impacts include any projects that could result in wasteful, inefficient, or unnecessary use of energy. Future projects would be subject to CEQA and would require an energy analysis, consistency with existing plans and policies for renewable energy and energy efficiency, and implementation of control measures and mitigation, if necessary to avoid wasteful, inefficient or unnecessary consumption of energy resources. The Project would result in a net reduction in electricity and natural gas consumption relative to the 2003 Approved South Campus, and the Project would be designed to maximize energy performance. Over the lifetime of the Project, the fuel efficiency of the vehicles used by the employees and commercial vehicles are expected to increase. Operation of the Project is expected to use decreasing amounts of petroleum over time due to advances in fuel economy. As such, the amount of petroleum consumed as a result of vehicular trips to and from the Project site during operation would decrease over time. In summary, although the Project would increase petroleum use during operation as a result of employees commuting to the site, the use would be a small fraction of the statewide use and, due to efficiency increases, would diminish over time. Furthermore, the Project would minimize construction and operational activities through energy reduction strategies pursuant to the Project's MM-GHG-1 through MM-GHG-4, and MM-GHG-8 through MM-GHG-14. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable. (Draft SEIR, pp. 4.4-16 and 4.4-17)

**E. GEOLOGY AND SOILS**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of geology and soils. Potential cumulative impacts on geology and soils would result from projects that combine to create geologic hazards, including unstable geologic conditions. The majority of impacts from geologic hazards, such as liquefaction, landslides, and unstable soils, are site-specific and are therefore generally mitigated on a project-by-project basis. Each cumulative project would be required to adhere to required building engineering design per the most recent version of the California Building Code to ensure the safety of building occupants and avoid a cumulative geologic hazard. Additionally, as needed, projects would incorporate individual mitigation or geotechnical requirements for site-specific geologic hazards present on each individual cumulative project site. Therefore, a potential cumulative impact related to site-specific geologic hazards such as subsidence, and soil collapse would not occur. Therefore, the proposed Project, in combination with other cumulative projects, would not contribute to a significant cumulative impact associated with geology and soils. (Draft SEIR, p. 4.5-13)

**F. GREENHOUSE GAS EMISSIONS**

March JPA concludes that the Project would not result in cumulatively considerable

impacts in the category of GHG emissions. GHG emissions inherently contribute to cumulative impacts, and, thus, any additional GHG emissions would result in a cumulative impact. Development of the Project site would be consistent with the County's Climate Action Plan and would not result in a conflict with the adopted Climate Action Plan; would support the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy by providing jobs in a jobs-poor area and through incorporation of energy efficiency, water conservation, recycling, and landscaping; and would demonstrate consistency with the California Air Resources Board Climate Change Scoping Plan. Given the Project's consistency with statewide, regional, and local plans adopted for the purpose of reducing GHG emissions, the Project's emissions and their effects on climate change would not be cumulatively considerable. Furthermore, the Project would be consistent with Senate Bill 32, the County's Climate Action Plan, and Senate Bill 375. The project would implement MM-GHG-1 through MM-GHG-14 to further reduce the Project's GHG emissions. Therefore, the Project would result in a less-than-cumulatively considerable GHG emissions impact. (Draft SEIR, p. 4.6-50)

#### **G. HAZARDOUS AND HAZARDOUS MATERIALS**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of hazards and hazardous materials. The U.S. Air Force implemented a comprehensive environmental assessment and remediation program for the March Business Center Specific Plan in February 2001 as part of the Finding of Suitability for Transfer when the March Air Force Base was redesignated as an Air Reserve Base. The measures defined in the program were required prior to transfer of ownership from the U.S. Air Force to the March JPA. As discussed in the Phase I Environmental Site Assessment and Phase I Environmental Site Assessment Addendum prepared by LOR Geotechnical Group, Inc. (included as Appendix H in the Draft SEIR), the Project site exhibits no evidence of potential recognized environmental conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to the Project site. Related projects would also be subject to federal, state, and local regulations regarding hazards and hazardous materials, and those within the jurisdiction of March JPA are subject to the same remediation program as the Project site. The potential for cumulative impacts to occur is limited because the impacts from hazardous materials use on a project site are site specific. Although each development site from the cumulative projects list has potentially unique hazardous materials considerations, it is expected that future development within the area will comply with federal, state, and local statutes and regulations applicable to hazardous materials. As such, cumulatively significant impacts associated with hazards and hazardous materials would not be anticipated.

The proposed Project and related projects include a mixture of uses such as commercial and industrial developments, which could store, use, generate or dispose of hazardous materials. Compliance with applicable federal, state, and regional regulations regarding hazardous materials would minimize potential contamination or hazardous materials-related incidents; thus, new development in the Project area is not expected to present significant risks to public health and safety. Further, mitigation measures specific to each proposed Project would be developed as part of the environmental review and permitting process. Through compliance with existing regulations, the Project would result in less-than-cumulatively considerable impacts. (Draft SEIR, pp. 4.7-6 and 4.7-7)

#### **H. HYDROLOGY AND WATER QUALITY**



March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of hydrology and water quality.

### Water Quality

The geographic context for the analysis of cumulative impacts associated with water quality is the encompassing Santa Ana River and Middle and Lower San Jacinto River Watersheds. Cumulative development in the watersheds will increase impervious areas and add new sources of pollutants in stormwater runoff. Construction activities associated with development could temporarily increase the number of exposed surfaces that could contribute to sediments in stormwater runoff. Additionally, materials associated with construction activities could be deposited on surfaces and carried to receiving waters in stormwater runoff. Continued development and redevelopment within the Santa Ana River and Middle and Lower San Jacinto River Watersheds could also increase the number of impervious surfaces that could increase stormwater runoff rates and amounts, as well as result in changes in land use that may increase the amount of pollutants in stormwater runoff. All cumulative development in the watersheds would be subject to the existing regulatory requirements to protect water quality and minimize increases in stormwater runoff. For example, the Construction General Permit requires the development and implementation of a Stormwater Pollution Prevention Plan for all construction sites larger than 1 acre to mitigate potential impacts to water quality from polluted stormwater runoff. Every 2 years, the Santa Ana Regional Water Quality Control Board must re-evaluate water quality within its geographic region and identify those water bodies not meeting water quality standards. For those impaired water bodies, a total maximum daily load must be prepared and implemented to reduce pollutant loads to levels that would not contribute to a violation of water quality standards. All development within the Santa Ana River and Middle and Lower San Jacinto River Watersheds are subject to the water quality standards outlined in the Basin Plan and must comply with any established total maximum daily loads. The continuing review process would ensure that cumulative development within the watershed would not substantially degrade water quality. The March JPA and co-permittee cities and counties within the Santa Ana River Watershed are subject to the requirements of their respective municipal separate storm sewer system (MS4) Permits. Currently, the MS4 permits require that the project designer and/or contractor of all new development and redevelopment projects that fall under specific “priority” project categories must develop a Water Quality Management Plan, which include low impact development requirements related to water quality. The low impact development features would address long-term effects on water quality within the San Jacinto and Santa Ana River Watershed and ensure best management practices and low impact development designs minimize potential water quality concerns to the maximum extent practicable. Therefore, impacts associated with water quality standards and polluted runoff in the watersheds would be minimized and the proposed Project’s contribution to cumulative impacts would not be cumulatively considerable.

### Groundwater

Development of nearby related projects would increase land use intensities in the area, resulting in increased water usage. The proposed Project and some of the related projects are served by the Western Municipal Water District. As such, development of the proposed Project and the related projects would increase the amount of water used in Western Municipal Water District’s service area. Western Municipal Water District’s Urban Water Management Plan has

planned for the provision of regional water, during normal, dry, and multiple dry years. The plan uses regional population, land use plans, and projections of future growth as the basis for planning water system improvements (including water treatment plants) and demonstrating compliance with state water conservation goals and policies. As such, to the extent that related projects are generally consistent with regional growth patterns and projections, the projects would not be expected to result in increased water usage causing the need for new entitlements, resources, and/or treatment facilities that are not already being planned to accommodate regional growth forecasts.

As previously discussed, the Western Municipal Water District has planned water supply projects aimed at meeting increased future water demands within its service area. These plans include increasing groundwater recharge capabilities, increasing the use of groundwater banking programs, increasing the use of desalinated water, and conjunctive use programs designed to increase regional water reliability. When coupled with regional groundwater management plans and the regulatory bindings of the basins, these projects would ensure that the proposed Project, as well as future regional projects, would not substantially decrease groundwater supplies or impede sustainable ground management of the relevant groundwater basins. Certain qualifying projects would be subject to Water Supply Assessment requirements, which assess the sufficiency of supply for existing and future demands, to serve as evidentiary basis for an approval action by the March JPA on such projects. Further, compliance with the California Green Building Standards Code would be required for new developments. This would ensure that many of the related projects, as well as the proposed Project, do not result in wasteful or inefficient use of limited water resources, and may in fact result in an overall decrease in water use per person. Due to water planning efforts and water conservation standards, impacts to groundwater supplies would be minimized, and the contributions of the proposed Project to cumulative impacts would not be cumulatively considerable.

#### Stormwater Drainage

The geographic context for the analysis of cumulative impacts related to storm drainage is the Santa Ana River and Middle and Lower San Jacinto River Watersheds. Cumulative development within the watershed would increase the number of impervious surfaces that could cause or contribute to storm drain and receiving water capacity exceedances, alter existing earthen channel profiles (i.e., create erosive downcutting and bank failure), and/or require the construction of new or expanded flood control infrastructure. However, new development within the watersheds would be subject to the environmental review process and compliance with local stormwater regulations, such as the Construction General Permit, the Section 404 permit process of the Clean Water Act, local municipal code requirements, and local Water Quality Management Plan requirements. The proposed Project would incorporate low impact development features during Project design to reduce impervious surfaces and reduce stormwater runoff. Similar to the proposed Project, other projects in the Santa Ana River and Middle and Lower San Jacinto River Watersheds would incorporate hydromodification features such that drainage rates would be no more than existing conditions. Therefore, impacts associated with changes in runoff in the watersheds would be minimized, and the contributions of the proposed Project to cumulative impacts would not be cumulatively considerable. (Draft SEIR, pp. 4.8-33 and 4.8-34)

## **I. LAND USE AND PLANNING**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of land use and planning. The Project would be located within the boundaries of the March Business Center Specific Plan. No existing land use designations would be removed, and one new land use designation, Public Facilities, would be introduced within South Campus. Acreages within each of the pre-existing zoning designations would change as a result of the proposed Project, and 0.9 acres of Public Facilities would be added to South Campus. The proposed Project would not result in the introduction of incompatible uses in the area. The proposed increase in Industrial, Commercial, Mixed Use, Public Facilities and Park/Open Space land uses (and respective reduction in Office and Business Park land uses) is in response to market conditions and community requests. Proposed land uses are consistent with existing and planned development within surrounding areas of the previously adopted March Business Center Specific Plan, resulting in a reduction in developable acreage when compared to existing permitted land uses. Proposed future cumulative projects would undergo an evaluation for consistency with local land use policies, as the proposed Project has done in the SEIR. Planned future development has been anticipated in the General Plans prepared by the local jurisdictions surrounding the proposed Project or through the General Plan Amendment process. Therefore, the proposed Project, when viewed in context with the cumulative development proposals, is not expected to result in adverse cumulative land use impacts above those already disclosed in the previous environmental analyses. In addition, future development within the Specific Plan area (including the southwest, central, and eastern segments of the South Campus Specific Plan area) would undergo site-specific analysis to ensure compliance with applicable development standards to prevent land use conflicts. The March JPA or other local jurisdiction would also be responsible for determining the appropriate public and infrastructure improvements required with the implementation of each project. Therefore, development consistent with the proposed Project is not expected to result in cumulative land use impacts. (Draft SEIR, pp. 4.9-23 and 4.9-24)

## **J. NOISE**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of noise. Construction noise impacts are highly localized (i.e., these do not generally affect the community noise level at distances beyond 1,500 feet). However, with simultaneous construction activities occurring at two or more project sites in close proximity to one another, the construction noise levels experienced at local receivers could be greater than for construction of each individual project. However, given the large scale of the Project site, and therefore the distribution of equipment across a large area at any given point in time during Project construction, the average construction noise levels at any given residence in proximity to the Project site would not be anticipated to be materially different for Project construction efforts combined with other local projects that could overlap in construction schedule, as compared to the Project by itself.

Non-transportation noise sources (e.g., Project operation) are typically Project-specific and highly localized (i.e., these do not generally affect the community noise level at distances beyond several hundred feet). As other development occurs in the area, noise from different types of uses (e.g., traffic, aircraft, fixed noise sources) would continue to combine, albeit on a localized basis, to cause increases in overall background noise conditions within the area. As a result, such sources do not significantly contribute to cumulative noise impacts at distant locations and are not evaluated on a cumulative level.

The Project would generate roadway traffic, which would be added to roadway volumes generated by other projects on the assembled cumulative project list. The traffic impact assessment evaluated the resulting roadway volumes from the proposed Project, in combination with the traffic generated from the cumulative project list. The cumulative traffic noise analysis (which is presented in the Draft SEIR) concluded that the Project would not contribute substantially to any cumulative traffic noise impact. For the reasons described above, the Project would have less-than-significant cumulative noise impacts. (Draft SEIR, pp. 4.10-71 and 4.10-72)

#### **K. RECREATION**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of recreation. Each related project would undergo an evaluation for physical effects to the environment, including impacts to existing recreational facilities and demand for new facilities. None of the related projects are recreational projects. Furthermore, related projects would be required to contribute to a fair share contribution of the cost of facilities based on standards such as the minimum parkland-to-population ratio for their respective jurisdictions. Impacts associated with the construction and operation of potential new recreational facilities would be analyzed within each related project's CEQA review. As such, each project would be required to contribute to development impact fee programs, if applicable, or expand or construct new facilities. As discussed above, the proposed Project, including the dog park and paseo, would result in less than significant impacts to recreational facilities. Therefore, the proposed Project, when viewed in context with the cumulative development proposals, is expected to result in less than significant cumulative impacts related to recreation. (Draft SEIR, p. 4.11-7)

#### **L. TRANSPORTATION**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of transportation.

For cumulative conditions, the Project's effect on VMT needs to be determined for VMT analysis. The Project's cumulative VMT was estimated using the Riverside County Transportation Analysis Model for the year 2040, and the results are presented in the Draft SEIR. The proposed Project was found to decrease VMT in the cumulative scenario. As such, the Project's cumulative impacts would be less than significant. (Draft SEIR, pp. 4.12-93 and 4.12-94)

#### **M. TRIBAL CULTURAL RESOURCES**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of TCRs. Cumulative impacts to TCRs would occur if the proposed Project, in combination with related projects, would affect identified tribal cultural resources. As discussed in the Draft SEIR, the Project would not result in impacts to TCRs, and therefore the Project would result in or contribute to cumulative significant impacts to TCRs. Cumulative impacts would be less than significant. (Draft SEIR, p. 4.13-18)

#### **N. UTILITIES AND SERVICE SYSTEMS**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of utilities and service systems.

### Water Supply

The proposed Project and related projects would be served by Western Municipal Water District. Based on the Water Supply Assessment, the proposed Project water demand of 87.8 acre-feet per year represents about 0.47% of Western Municipal Water District's retail total water demand for 2019. Development of the proposed Project, in combination with related projects, would increase land-use intensities in the area, resulting in increased water usage. Western Municipal Water District has planned projects aimed at meeting increased future water demands within its service area. These plans include increasing groundwater recharge capabilities, increasing the use of groundwater banking programs, increasing the use of desalinated water, and conjunctive use programs designed to increase regional water reliability. In addition, the Western Municipal Water District 2015 Urban Water Management Plan includes a Water Supply Shortage Contingency Plan, which addresses the stages of response to a water shortage, such as a drought, that occurs over a period of time, as well as catastrophic supply interruptions that occur suddenly. The primary objective of the water shortage contingency plan is to ensure that Western Municipal Water District has in place the necessary resources and management responses needed to protect health and human safety, minimize economic disruption, and preserve environmental and community assets during water supply shortages and interruptions.

Based on the information and analysis contained in the Project Water Supply Assessment, Western Municipal Water District concluded that the total projected water supplies available to Western Municipal Water District during normal, single-dry, and multiple-dry years throughout the next 20-year period are sufficient to meet the projected water demands of the proposed Project, in addition to Western Municipal Water District's existing and planned future uses, in accordance with the standards set forth by Senate Bill 610. These projections consider land use, water development programs and projects, and water conservation. To the extent that related projects are generally consistent with regional growth patterns and projections, the related projects would not be expected to result in increased water usage causing the need for new entitlements, resources, and/or treatment facilities that are not already being planned to accommodate regional growth forecasts.

Lastly, compliance with the California Green Building Code would be required for new related project development. For redevelopment projects, this generally indicates that newly installed appliances and plumbing would be more efficient than those used within the structures originally located on redevelopment sites. In addition, California Green Building Code standards require a mandatory reduction in outdoor water use, in accordance with the California Department of Water Resources' Model Water Efficient Landscape Ordinance. This would ensure that many of the related projects, as well as the proposed Project, do not result in wasteful or inefficient use of limited water resources and may, in fact, result in an overall decrease in water use per person. As a result, water supply impacts would not be cumulatively considerable.

### Wastewater

The Specific Plan area and each related project would incrementally increase the amount

of wastewater that is being generated in the area. With respect to wastewater conveyance, sewer plans have been provided depicting wastewater lines within the Specific Plan area and off-site leading into the Western Water Recycling Facility. Similar to the Project, the capacity of receiving sewer lines associated with cumulative project development would be determined on a project-specific basis. In the event that sewer upgrades are required, all construction work within the county/city public right-of-ways would be subject to local municipal code requirements. As a result, indirect cumulative impacts associated with off-site upgrades to sewer mains would not be cumulatively considerable. Impacts would be less than significant, and no mitigation is required.

The proposed Project would convey wastewater offsite through existing municipal sewage infrastructure to the Western Water Recycling Facility, which has an approximate treatment capacity of 3 million gallons per day (mgd). When considering the proposed Project in addition to the existing commitments of the Western Water Recycling Facility, the South Campus development would require 0.85 mgd of wastewater treatment. The permitted design capacity for the Western Water Recycling Facility is 3 mgd, and when the Western Water Recycling Facility was upgraded in 2011, the wastewater generated from buildout of the 2003 Approved South Campus was taken into account. Additionally, Western Municipal Water District owns 1.95 mgd of treatment capacity at the Western Riverside County Regional Wastewater Authority. Therefore, between the combined capacity of these two facilities, adequate capacity exists to serve the proposed Project. Given that the proposed Project would result in the generation of less wastewater than that of the 2003 Approved South Campus, and that the Project would result in beneficial impacts when compared to the 2003 Approved South Campus, the Project would not result in cumulatively considerable impacts to wastewater and cumulative impacts would be less than significant.

#### Solid Waste

Development of the proposed Project in combination with related projects would increase land-use intensities in the area, resulting in increased solid waste generation in the service area for El Sobrante, Lamb Canyon, and Badlands Landfills. However, as of 2018, El Sobrante Landfill had a throughput capacity of 16,054 tons per day, has a remaining capacity of 143,977,170 cubic yards, and is expected to operate until January 2051. In addition, the Lamb Canyon Sanitary Landfill has a maximum daily throughput of 5,000 tons per day, with an estimated remaining capacity of 19,242,950 cubic yards; and the Badlands Sanitary Landfill has a maximum daily throughput of 4,800 tons per day, with an estimated remaining capacity of 15,748,799 cubic yards. Further, Assembly Bill 939, or the Integrated Waste Management Act of 1989, mandates that cities and counties (including entities such as joint powers authorities) divert from landfills 50% of the total solid waste generated to recycling facilities. In order to maintain state requirements of diverting 50% of solid waste and to offset impacts associated with solid waste, the Proposed Project and all related projects would be required to implement waste reduction, diversion, and recycling during both demolition/construction and operation. Through compliance with the March JPA General Plan goals and policies for solid waste and state solid waste diversion requirements and due to the recycling collection features that would be part of the proposed Project design and the design of other projects within March JPA jurisdiction pursuant to existing regulations, solid waste impacts would not be cumulatively considerable.

#### Electric Power, Natural Gas, and Telecommunication

Approximately half of the Project area has been developed and is provided with existing power, natural gas, and telecommunications facilities and services. Additionally, an electrical substation is already located within the South Campus Specific Plan area to provide electrical services to the full buildout of the South Campus Specific Plan area. As a result, buildout of the proposed Project may require new connections to existing electrical power, natural gas, and telecommunication infrastructure. New connections from the proposed Project to the existing utility infrastructure would occur incrementally during buildout, on a plot-by-plot basis. Trenching and excavations completed for the new connections to existing electric, natural gas, and telecommunication infrastructure could result in potential short-term soil erosion, as excavated and temporarily stockpiled soils would be susceptible to rainfall. However, standard best management practices, required as part of the required Stormwater Pollution Prevention Plan, would minimize potential impacts. Individual projects would be required to provide for specific project needs. As a result, cumulative impacts associated with upgrades of electric, natural gas, and telecommunication facilities would not be cumulatively considerable. (Draft SEIR, pp. 4.14-28 through 4.14-30)

## **O. WILDFIRE**

March JPA concludes that the Project would not result in cumulatively considerable impacts in the category of wildfire. A cumulatively significant impact related to wildfire risks could occur as a result of the proposed Project, when considered in combination with the construction and operation of the related projects, if it were within or near a very high fire hazard severity zone exacerbating wildfire risk based on topography and/or relationship to an emergency evacuation plan. As such, adverse effects of wildfire risk tend to be localized; therefore, as explained below, impacts from nearby projects would be limited, if any, and the Project site would be primarily affected by proposed Project activities. The Project site is not located within a very high fire hazard severity zone. The nearest very high fire hazard severity zone to the Project site is more than 5 miles southwest of the Project site. As mentioned previously, Project-related impacts regarding the exposure of people or structures to significant risk of runoff, post-fire slope instability, or drainage changes would be less than significant. As such, Project-related impacts are specific to the Project site and would not contribute to (or be shared with an additive sense) the impacts on other project sites. Therefore, the proposed Project would contribute a less than significant cumulative impact.

Each related project would be required to satisfy the policies and regulations within the California Fire Code and its respective jurisdiction's regulations to reduce impacts related to emergency access, fire flow, and proximity to wildfire zones. Similar to the proposed Project, each of the related projects would be individually subject to either Riverside County Fire Department review or review by its own fire department, and would be required to comply with all applicable construction-related and operational fire safety requirements of the Riverside County Fire Department in order to adequately reduce potential wildfire impacts. Therefore, the proposed Project would not contribute to any significant cumulative wildfire impacts. Impacts would be less than significant.

With respect to emergency plans, the design of each related project would be evaluated individually in coordination with its respective jurisdiction's applicable department (such as Riverside County Fire Department and the Sheriff's Department) to minimize any potential impacts. As such, cumulative impacts related to wildfire risk would be less than significant.

(Draft SEIR, pp. 4.15-15 and 4.15-16)



## **SECTION VII** **GROWTH-INDUCING IMPACTS**

Section 15126.2(d) of the State CEQA Guidelines requires a Draft EIR to discuss the ways the Project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. In accordance with State CEQA Guidelines Section 15126.2(d), a Project would be considered to have a growth-inducing effect if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing in the surrounding environment;
- Remove obstacles to population growth (e.g., construction of an infrastructure expansion to allow for more construction in service areas);
- Tax existing community service facilities, requiring the construction of new facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

In addition, the CEQA Guidelines states that it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Overall, the Project would indirectly stimulate population growth through the addition of new employees/staff. However, the growth was anticipated and discussed within the 2003 Focused EIR and the vision for the Project area becoming “a major employment center” would be similar to that of the 2003 Approved South Campus. This growth would be consistent with employment growth envisioned in local and regional land use plans and in projections made by regional planning authorities, since the planned growth of the Project and its land use intensity have been factored into the underlying growth projections of the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy (Draft SEIR, pp. 5-4 and 5-5). March JPA therefore finds that the Project is not growth inducing.

## SECTION VIII ALTERNATIVES

### A. BACKGROUND

The Draft SEIR analyzed three alternatives to the Project as proposed and evaluated these alternatives for their ability to avoid or reduce the Project's significant environmental effects while also meeting the majority of the Project's objectives. March JPA finds that it has considered and rejected as infeasible the alternatives identified in the SEIR and described below. This section sets forth the potential alternatives to the Project analyzed in the SEIR and evaluates them in light of the Project objectives, as required by CEQA.

Where significant impacts are identified, section 15126.6 of the State CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

- (a) An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

- (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In subsection 15126.6(c), the State CEQA Guidelines describe the selection process for a range of reasonable alternatives:

- (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the

lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

## **B. PROJECT OBJECTIVES**

The proposed Project requests an amendment to the existing South Campus components of the March Business Center Specific Plan (South Campus Specific Plan) to shift land uses between parcels. The proposed Project would not develop any land within the South Campus Specific Plan area that was not already approved for development, nor would the Project encroach upon the March Air Reserve Base or its operations. The project objectives identified in the 2003 Focused EIR included the following:

- Implement the goals, objectives and policies of the March Joint Powers Authority (JPA) General Plan
- Provide increased job opportunities for local residents through the provision of employment-generating uses
- Establish an attractive business park development that will blend the natural and built environment and create a high quality business park development
- Provide for the design, development and operation of a business park consisting of industrial, research and development, office, commercial and open space uses
- Establish a land use and facility plan that assures project viability in consideration of existing and anticipated economic conditions
- Ensure a business park development that conforms to the March JPA goals and values and the protection of adjacent land uses from incompatibility
- Develop the property with land uses that are compatible with the March Air Force Base Reuse plan
- Encourage the use of alternative modes of transportation through the provision of a pedestrian circulation system that is both safe and comfortable

- Ensure that businesses within the March Business Center Specific Plan provide a range of job types for the community's residents
- Provide a circulation system that facilitates movement and access needs of automobiles, pedestrians and bicyclists
- Minimize impacts from construction of the development to sensitive biological resources

To reflect the evolving community priorities and environmental regulatory landscape, the proposed mix of uses has been designed to reduce the environmental impacts compared to the 2003 Approved South Campus as well as the currently approved South Campus development. As such, objectives for this Project are as follows:

- Respond to community requests for community serving land uses, including a dog park, additional retail uses, such as restaurants and stores.
- Provide a mix of uses that reduces the overall impacts compared to the original and currently entitled uses.
- Site community serving uses in locations easily accessible from Van Buren Boulevard.
- Provide appropriate land use intensities to comply with the parameters of the March Air Reserve Base/Inland Port Airport Compatibility Plan.
- Implement the goals, objectives and policies of the March JPA General Plan.
- Provide increased job opportunities for local residents through the provision of employment-generating businesses.
- Establish a land use and facility plan that ensures project viability in consideration of existing and anticipated economic conditions.
- Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient and comfortable.
- Provide a range of job types for the community's residents.
- Minimize impacts from construction of the development to sensitive biological resources.
- Implement the terms and conditions agreed upon in the September 12, 2012 Settlement Agreement entered into between and among the Center for Biological Diversity, 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.*

### **C. ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED ANALYSIS**

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process; and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; and/or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered but rejected as part of the environmental analysis for the Project:

Alternative Sites. In accordance with CEQA Guidelines, Section 15126.6(f)(2), the March JPA attempted to identify a feasible alternative off-site location within the Project area that could be available for the development of the Project. Pursuant to CEQA Guidelines, Section 15126.6(f)(2)(A), the key question and first step in analysis of the off-site location is whether any of the significant effects of the Project would be avoided or substantially lessened by moving the Project to another location.

Development of the proposed Project on an alternate site was considered but rejected as infeasible. The reason for the dismissal of this alternative is that a South Campus Specific Plan has already been approved and adopted, and portions of the Specific Plan, including much of the roadway network, have been implemented. To relocate the entire South Campus Specific Plan development to an alternate site would require nearly 600 acres of undeveloped land suitable for the construction of Office, Commercial, Mixed Use, Business Park, Industrial, Parks/Open Space, and Public Facilities uses. Much of the South Campus Specific Plan area has already undergone grading, and three warehouse developments as well as an open space area with a trail network have been developed; to relocate the entire existing and planned development under the approved Specific Plan would require extensive grading and a new set of potentially significant environmental impacts. For these reasons, an alternative site was considered but rejected from further analysis as infeasible. (Draft SEIR, p. 6-4.)

No Development Alternative. A No Development Alternative was considered but rejected as infeasible. The reason for the dismissal of this alternative is that portions of the approved South Campus Specific Plan have already been developed, including three industrial warehouses, a detention basin, open space with a trail network, an electrical substation, and much of the roadway network. Additionally, a commercial development has been approved and is currently under construction. Much of the South Campus Specific Plan area has already been graded, water, wastewater, natural gas, and electrical infrastructure has been installed throughout the campus, and given that development has already occurred within the South Campus Specific Plan area and that an approved Specific Plan has been adopted for the site, eliminating any further development from occurring would be financially infeasible, as there would not be a return on the investments made to prepare the site for development. Additionally, the No Development Alternative would require revoking all current entitlements and would not meet any of the Project's objectives. For these reasons, a No Development Alternative was considered but rejected as infeasible. (Draft SEIR, p. 6-4.)

**Findings:** March JPA rejects alternative sites on the following grounds, each of which individually provides sufficient justification for rejection: (1) the alternative does not avoid any

significant and unavoidable impacts, (2) the alternative would likely not further reduce any of the proposed Project's significant impacts; and (3) the alternative is infeasible because the South Campus Specific Plan has already been approved and adopted, portions of the Specific Plan have already been developed, and finding a site of a similar size in the Project vicinity that is available for development of similar uses is not feasible.

March JPA rejects the No Development Alternative on the following grounds, each of which individually provides sufficient justification for rejection: (1) the alternative would fail to meet the Project's objectives, and (2) the alternative is infeasible because the South Campus Specific Plan has already been approved and adopted, and portions of the Specific Plan have already been developed. As such, this alternative would require revoking all current entitlements and would not be economically viable, because there would not be a return on the investments already made to prepare the site for development.

Therefore, alternative sites and the No Development Alternative are eliminated from further consideration.

#### **D. EVALUATION OF ALTERNATIVES SELECTED FOR ANALYSIS**

The alternatives selected for further detailed review within the SEIR focus on alternatives that could reduce the Project's significant environmental impacts, while still meeting most of the basic Project objectives. Those alternatives include:

- Alternative 1: No Project (Draft SEIR, Section 6.4.2)
- Alternative 2: South Campus Re-Entitlement Only (Draft SEIR, Section 6.4.3)
- Alternative 3: Business Park (Draft SEIR, Section 6.4.4)

##### **1. Alternative 1: No Project**

Description: Under Alternative 1, the build out of the remainder of the South Campus Specific Plan area would occur as currently approved, including all previously approved revisions, which include shifts in land use designations and realignment of roadways, to the 2003 South Campus. The proposed Village West Drive Extension would not be implemented.

Impacts: Impacts in the categories of air quality and transportation would increase and would remain significant and unavoidable. Impacts in the categories of energy and GHG emissions would increase. Impacts in the categories of aesthetics and hydrology and water quality would increase but would remain less than significant. Impacts in the categories of biological resources, hazards and hazardous materials, tribal cultural resources, and wildfire would be comparable to those of the Project and would remain less than significant. Impacts in the categories of geology and soils, land use and planning, noise, and utilities and service systems would be reduced and would remain less than significant. Impacts in the category of recreation would be reduced. (Draft SEIR, pp. 6-7 through 6-17)

Attainment of Project Objectives: Table 6-7 in the Draft SEIR shows that Alternative 1

would meet 7 of the Project objectives, would partially meet 3 of the Project objectives, and would not meet 1 of the Project objectives. (Draft SEIR, p. 6-18 and 6-19)

Finding: March JPA rejects Alternative 1 on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative does not avoid the proposed Project's significant and unavoidable impacts relating to air quality and transportation and (2) the alternative does not reduce the severity of the Project's significant and unavoidable impacts (rather, the alternative increases the severity of these impacts).

## **2. Alternative 2: South Campus Re-Entitlement Only**

Description: Under Alternative 2, the build out of the remainder of the South Campus Specific Plan area would occur in a manner identical to the proposed Project; however, no Village West Drive Extension would occur.

Impacts: Impacts in the category of hydrology and water quality would increase but would remain less than significant. Impacts in the categories of air quality and transportation would be generally the same and would remain significant and unavoidable. Impacts in the categories of energy, geology and soils, GHG emissions, hazards and hazardous materials, land use and planning, recreation, and wildfire would be comparable to those of the proposed Project and would remain less than significant. Impacts in the categories of aesthetics, biological resources, noise, tribal cultural resources, and utilities and service systems would be reduced and would remain less than significant. (Draft SEIR, pp. 6-20 through 6-29)

Attainment of Project Objectives: Table 6-12 demonstrates that Alternative 2 would meet all Project objectives. (Draft SEIR, p. 6-31)

Finding: March JPA rejects Alternative 2 on the following grounds: the alternative fails to avoid or reduce the Project's significant and unavoidable impacts relating to air quality and transportation. This alternative would also not provide the benefit of a through, and improved connection along Village West Drive between Van Buren Boulevard and Nandina Avenue.

## **3. Alternative 3: Business Park**

Description: Under Alternative 3, the build out of the remainder of the South Campus Specific Plan area, with the exception of the 9.4-acre proposed Grocery Store, would occur as Business Park uses. The existing Open Space/Park (i.e., park and trail system, conservation easement, basin), Industrial and Commercial projects which have been constructed/entitled would remain, as would the Industrial and Commercial land use designations for those sites. Under Alternative 3 build-out conditions, the acreage of Business Park uses would increase, and the acreages of the following uses would be reduced: Office, Commercial, Mixed Use, Industrial, Park/Open Space, and Public Facilities. Additionally, under Alternative 3, the proposed Village West Drive Extension would not be implemented.

Impacts: Impacts in the categories of air quality and transportation would increase and would remain significant and unavoidable. Impacts in the categories of aesthetics and hydrology and water quality would increase but would remain less than significant. Impacts on the categories of energy, GHG emissions, and utilities and service systems would increase. Impacts in the categories of biological resources, hazards and hazardous materials, land use and planning, noise, tribal cultural resources, and wildfire would be comparable to those of the proposed Project and would remain less than significant. Impacts in the categories of geology and soils and recreation would decrease and would remain less than significant. (Draft SEIR, pp. 6-32 through 6-42)

Attainment of Project Objectives: Table 6-17 shows that Alternative 3 would meet 6 of the Project objectives and would partially meet 5 of the Project objectives.

Finding: March JPA rejects Alternative 3 on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative does not avoid the proposed Project's significant and unavoidable impacts relating to air quality and transportation and (2) the alternative does not reduce the severity of the Project's significant and unavoidable impacts (rather, the alternative increases the severity of these impacts).

#### **E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. Based on the alternatives analysis contained within the Draft SEIR, Alternative 2, the South Campus Re-Entitlement Only Alternative, is identified as the Environmentally Superior Alternative. While Alternative 2 would be the Environmentally Superior Alternative, this alternative would prevent the beneficial hydrology and water quality and wildfire impacts associated with improving Village West Drive and would not provide the through connection between Van Buren Boulevard and Nandina Avenue via an improved roadway. (Draft SEIR, pp. 6-43 through 6-44)



**SECTION IX**  
**ADOPTION OF STATEMENT OF OVERRIDING CONSIDERATIONS**

Pursuant to State CEQA Guidelines Section 15093(a), the March JPA must balance, as applicable, the economic, legal, social, technological, or other benefits of the Project against its unavoidable environmental risks in determining whether to approve the project. If the specific benefits of the project outweigh the unavoidable adverse environmental effects, those environmental effects may be considered acceptable.

Having reduced the adverse significant environmental effects of the Project to the extent feasible by adopting the mitigation measures; having considered the entire administrative record on the Project; March JPA has weighed the benefits of the Project against its unavoidable adverse impacts after mitigation in regards to air quality and transportation. While recognizing that the unavoidable adverse impacts are significant under CEQA thresholds, March JPA nonetheless finds that the unavoidable adverse impacts that will result from the Project are acceptable and outweighed by specific social, economic and other benefits of the Project.

In making this determination, the factors and public benefits specified below were considered. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, March JPA would be able to stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Records of Proceeding.

March JPA therefore finds that for each of the significant impacts which are subject to a finding under CEQA Section 21081(a)(3), that each of the following social, economic, and environmental benefits of the Project, independent of the other benefits, outweigh the potential significant unavoidable adverse impacts and render acceptable each and every one of these unavoidable adverse environmental impacts:

- The Project will implement the goals, objectives and policies of the March JPA General Plan, specifically encouraging the development of industrial, commercial, business park uses to expand the employment and financial base of the March JPA Planning Area in a manner that is compatible with the nearby airbase and adjacent uses.
- The Project will provide increased job opportunities for local residents through the provision of employment-generating businesses.
- The Project will establish a land use and facility plan that ensures project viability in consideration of existing and anticipated economic conditions.
- The Project will develop the property with land uses that are compatible with the March Air Force Base Reuse program.
- The Project will encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is both safe and comfortable.
- The Project will provide a range of job types for the community's residents.

- The Project will provide a circulation system, including but not limited to the extension and improvement of Village West Drive, that facilitates movement and access needs of automobiles, pedestrians and bicyclists.
- The Project will minimize impacts from construction of the development to sensitive biological resources and the surrounding community.
- The Project will help balance the jobs to housing ratio within Riverside County. This would reduce the need for the existing local workforce to commute outside the area for employment.
- The Project will provide industrial uses in an area that takes advantage of the proximity to the I-215 freeway, as well as existing and planned transportation corridors in order to reduce traffic congestion on surface streets and concomitant air pollutant emissions from vehicle sources.
- The Project will provide employment opportunities that will enhance the area's economy.
- The Project will facilitate goods movement for the benefit of local, regional, statewide, and nationwide economic growth.
- The Project will enhance the area's economy by developing a large property with employment-generating land uses with long-term economic viability.

March JPA hereby declares that the SEIR has identified and discussed significant effects that may occur as a result of the Project. With the implementation of the mitigation measures discussed in the SEIR, these effects can be mitigated to a level of less than significant, except for unavoidable significant impacts as discussed in Section IV of these Findings. March JPA hereby declares that it has made a reasonable and good faith effort to eliminate or substantially mitigate the potential impacts resulting from the Project. March JPA further finds that, except for the Project, all other alternatives set forth in the SEIR are infeasible because they would fail to avoid or reduce the Project's significant and unavoidable effects on the environment and would not provide the benefit of a through, and improved connection along Village West Drive between Van Buren Boulevard and Nandina Avenue.

For the foregoing reasons, March JPA hereby declares that the benefits provided to the public through approval and implementation of the Project outweigh any significant adverse environmental impacts of the Project. The March JPA Commission finds that each of the Project benefits outweighs the adverse environmental effects identified in the SEIR, and therefore finds those impacts to be acceptable. The substantial evidence demonstrating the benefits of the Project are set forth in these findings, and in the documents in the record of proceedings. Therefore, the March JPA Commission adopts this Statement of Overriding Considerations.