

**Attachment B**  
**Additional Review of Cultural  
and Historical Documentation**







T: 626.408.8006  
info@paleowest.com

LOS ANGELES COUNTY  
517 S. Ivy Avenue  
Monrovia, CA 91016

August 7, 2020

Kathy Hoffer  
Hillwood Enterprises, L.P.  
901 Via Piemonte, Suite 175  
Ontario, CA 91764  
Transmitted via email to Kathy.Hoffer@hillwood.com

**RE: Response to Comment 12-18 for the Draft Environmental Impact Report for the Veteran's Industrial Park 215 Project, Riverside County, California**

Dear Ms. Hoffer,

Hillwood Enterprises, L.P. (Hillwood) requested that PaleoWest Archaeology LLC (PaleoWest) review the March Air Force Base's (MAFB's) Base Realignment and Closure Environmental Assessment (BRAC EA) to respond to a comment (Comment 12-18) concerning the cultural resource analysis in the draft Environmental Impact Report (DEIR) for the Veteran's Industrial Park 215 (VIP 215) Project. The comment was submitted by the Department of the Air Force on March 11, 2020 and stated:

All historic and cultural resources were evaluated through the BRAC of the base. Did you read the BRAC EA and confirm that these were not in fact listed? The agreement for BRAC was that the responsibility of all listed historic resources would be managed by JPA. I see no reference to this document.

PaleoWest contacted Christhild Wagner, Cultural and Natural Resource Manager for the U.S. Air Force Reserve Command at March Air Reserve Base, to obtain a copy of the BRAC EA. On August 7, 2020, she provided PaleoWest with copies of several documents including the *Basewide Environmental Baseline Survey* (U.S. Air Force 1994), *Final Environmental Impact Statement for the Disposal of Portions of March Air Force Base, California, Volume I and II* (U.S. Air Force 1996), two historical resource inventory and evaluation reports (U.S. Army Corps of Engineers 1991 and William Manley Consulting 1995), and a 1946 aerial photograph showing the Project area and surrounding area.

A review of these documents found no evidence of known archaeological or historical resources within the Project area or off-site improvement areas. Furthermore, MARB Facilities #1616, #1617, or #1622, whose archaeological remnants were documented and evaluated by Applied EarthWorks, Inc. (2016), are not listed or discussed in any of the reviewed documents. Based on the information provided by Ms. Wagner, the three buildings appear to have been constructed between 1946 and 1966 and were likely associated with the Cold War period operations at the MAFB. An aerial photograph from 1978 indicates that all three buildings had been demolished by the late 1970s (NETROnline 2020).

If you have any questions regarding our review of the cultural resource documents on file at the MARB, or the conclusions of our review provided herein, please do not hesitate to contact me at 310-210-9884.

Sincerely,

A handwritten signature in black ink that reads "Tiffany Clark". The signature is written in a cursive, flowing style.

Tiffany Clark, PhD, RPA  
Senior Archaeologist  
tclark@paleowest.com

## References

NETROnline

2020 1996 Aerial Image of the Project area. Accessed August 7, 2020 at <https://www.historicaerials.com/viewer>.

Smallwood, Josh, Joan George, and Michael Mirro

2016 Cultural Resources Assessment of March Inland Airport Parcel D2 Project, Riverside County, California. Report prepared by Applied EarthWorks, Inc. for Hillwood, Ontario, California.

U.S. Air Force

1994 Basewide Environmental Baseline Survey, March Air Force Base, California. Document on file March Reserve Air Base, Riverside County, California.

1996 Final Environmental Impact Statement, Disposal of Portions of March Air Force Base, California, Volume I and II. Document on file March Reserve Air Base, Riverside County, California.

U.S. Army Corps of Engineers

1991 Inventory and Evaluation of World War II Structures, March Air Force Base, Riverside California (Draft). Report on file March Reserve Air Base, Riverside County, California.

William Manley Consulting

1995 Historic Building Inventory and Evaluation, March Air Force Base, Riverside County, California. Report prepared for the U.S. Department of the Air Force, Brooks Air Force Base, Texas. Document on file March Reserve Air Base, Riverside County, California.