

Attachment D
**Modifications to the Project and
Additional Environmental
Documentation**



August 27, 2020

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

Subject: Veterans Industrial Park 215 - Modifications to the Project and Additional Environmental Documentation

Dear Mr. Smith:

During the preparation of the Response to Comments on the Draft EIR, the project applicant identified modifications to the Specific Plan related to landscaping and stormwater basin(s), and to water and sewer facilities to address issues raised by the Riverside County Airport Land Use Commission (ALUC), Western Municipal Water District and Department of the Army. Following is a discussion of the proposed project modifications and discussions regarding the potential environmental effects associated with the proposed modifications.

Proposed Project Modifications

Section 4.3.1, Landscape Master Plan, and Section 4.3.2, Water Quality, of the Veterans Industrial Park 215 Specific Plan have been revised to modify the draft landscape plan based on input provided by the ALUC during its consideration of the Single Building option's consistency with the adopted March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (ALUCP). Because of the proximity of the project site to airfields, ALUC staff requested that the conceptual landscape plan in the draft Specific Plan be modified to eliminate trees "that will bear mast or grow to an adequate size for roosting..."

Section 4.3.1 of the Specific Plan has been revised to eliminate trees on the eastern side of the site proximate to the airfield and permit trees, shrubs, and ground cover plants west of the eastern façade of the proposed building(s). The conceptual landscape plans provided as Figures 4-3 and 4-4 have been revised to incorporate these changes. The plant materials palette has been modified and includes as revised Table 4-1 in the Specific Plan.

With respect to the stormwater basins, Section 4.3.2 of the Specific Plan has been revised to indicate that only hardscape materials (i.e., non-vegetated) will be permitted in order to avoid attracting birds, in accordance with the ALUC guidance for landscaping near airports.

Sections 4.3.1 and 4.3.2 on pages 4-5 to 4-11 of Appendix O, Veterans Industrial Park 215 Draft Specific Plan are revised as follows:

4.3.1 Landscape Master Plan

Mr. Smith
 August 27, 2020
 Page 2

Landscape treatments around buildings will be designed to help break up the building massing by incorporating both ~~tall, vertical trees~~ and lower growing and ~~broader~~-canopy trees along Van Buren Boulevard. The ground plane will be landscaped with a mix of shrubs and ground cover plants to create a layered appearance along the western edge of the site adjacent to Van Buren Boulevard. On the eastern side of the site adjacent to the airfield, landscaping will not include tree plantings and will provide a ground plane with sharp edges between shrubs and groundcover. A Conceptual Landscape Plan for the Specific Plan area is illustrated on Figures 4-3, and 4-4 *Landscape Master Plan (Note: revised figures provided)*. Trees used within the Specific Plan will be selected from the list on Table 4-1 *Plant Materials*. Shrubs and groundcovers will be selected concurrent with final designs for individual projects within the Specific Plan area and shall be in keeping with the Airport Land Use Commission guidance for landscaping near airports (see Appendix D).

Subsequent landscape plans created by tenants must adhere to the landscape materials outlined in this Section of the Specific Plan.

- Landscaping shall be provided in all setback areas of the Specific Plan area.
- The Specific Plan area shall comply with the landscape design measures to reduce water use contained within the MIPA Development Code Section 9.17 and with the ALUC guidance for landscaping near airports.
- Streetscapes will incorporate low water use plant materials to minimize irrigation needs. Open space areas not planted with living material should utilize permeable materials such as decomposed granite, mulch and/or rocks/cobble to reduce irrigation demands where possible.
- The community shall be irrigated with reclaimed or recycled water if available.
- Planting areas will be irrigated with a high efficiency automatic irrigation system.

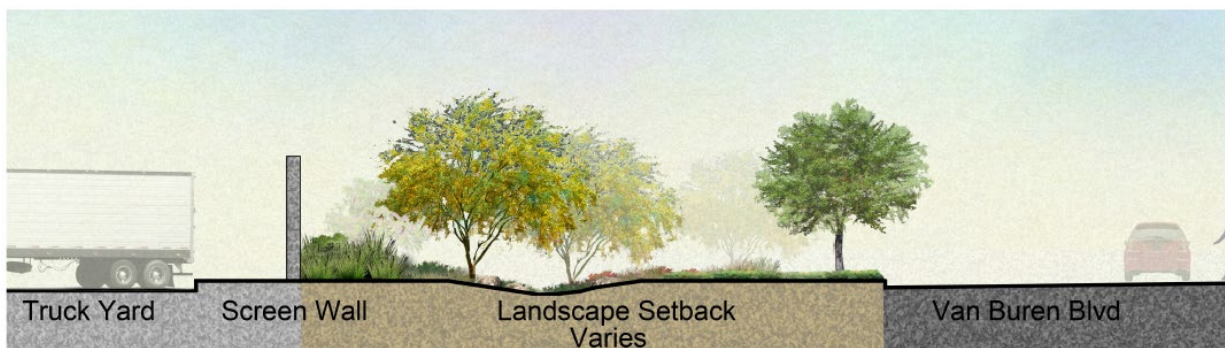


Figure 4-2 Van Buren Boulevard Streetscape Edge
Note: no change to figure

Mr. Smith
 August 27, 2020
 Page 3

4.3.2 Water Quality

~~Bio-retention~~Stormwater basins are included in the drainage plan for the Specific Plan. The basins are shallow impoundments designed to collect, treat, and detain stormwater runoff before discharging it. ~~In addition to functioning as storm water/water treatment facilities, water quality features such as bioswales need to consider their impact on the overall aesthetics of the project. Whenever possible, these facilities will be carefully sited and integrated into landscaped areas if possible, and to avoid the look of engineered, utilitarian facilities. The design should~~ integrated into the landscape and appear as a landscape feature, while incorporating acceptable plant materialutilize hardscape materials (i.e. non-vegetated) to avoid attracting birds, in accordance with the ALUC guidance for landscaping near airports.

Note: the infiltration basin photograph is deleted.

~~Vegetative cover is important to minimize erosion and ensure that treatment occurs in biofiltration basins. To prevent basins from being used as walkways or passive recreation areas to the extent that their primary function is compromised, bioretention facilities will be planted with a combination of small trees along the upper edges, densely planted shrubs, and natural grasses (see Table 4-2).~~

~~Final design of on-site basin landscaping plant materials and will be reviewed by a BASH certified biologist for compliance with FAA regulations.~~

Table 4-1				
Plant Materials - Trees				
Botanical Name	Common Name	Size	WUCOLS	Remarks
<u>Cercidium ‘Desert Museum’</u>	<u>Blue Palo Verde</u>	<u>24” Box</u>	<u>L</u>	<u>Multi</u>
<u>Cercis occidentalis</u>	<u>Western Redbud</u>	<u>24” box</u>	<u>M</u>	
<u>Chilopsis linearis</u>	<u>Desert Willow</u>	<u>24” Box</u>	<u>L</u>	<u>Multi</u>
<u>Chitalpa tashkentensis</u>	<u>Chitalpa</u>	<u>24” Box</u>	<u>L</u>	<u>Standard</u>
<u>Prosopis ssp.</u>	<u>Mesquite Tree</u>	<u>24” Box</u>	<u>M</u>	<u>Standard</u>
<u>Acacia smallii</u>	<u>Acacia</u>	<u>24” Box</u>	<u>L</u>	<u>Multi</u>
<u>Acacia stenophylla</u>	<u>Shoestring Acacia</u>	<u>24” Box</u>	<u>L</u>	<u>Multi</u>
<u>Lagerstroemia indica</u>	<u>Crape Myrtle</u>	<u>24” Box</u>	<u>M</u>	
<u>Pinus canariensis</u>	<u>Canary Island Pine</u>	<u>24” Box</u>	<u>M</u>	<u>Standard</u>
<u>Pinus eldarica</u>	<u>Afghan Pine</u>	<u>24” Box</u>	<u>L</u>	<u>Standard</u>

Mr. Smith
 August 27, 2020
 Page 4

Table 4-1				
Rhus lancea	African Sumac	24" Box	L	Standard
Tristania conferta	Brisbane Box	24" Box	M	Standard
Washington robusta	Mexican Fan Palm	10' bt	L	Skinned
Brahia armata	Blue Fan Palm	15 Gal	M	Standard

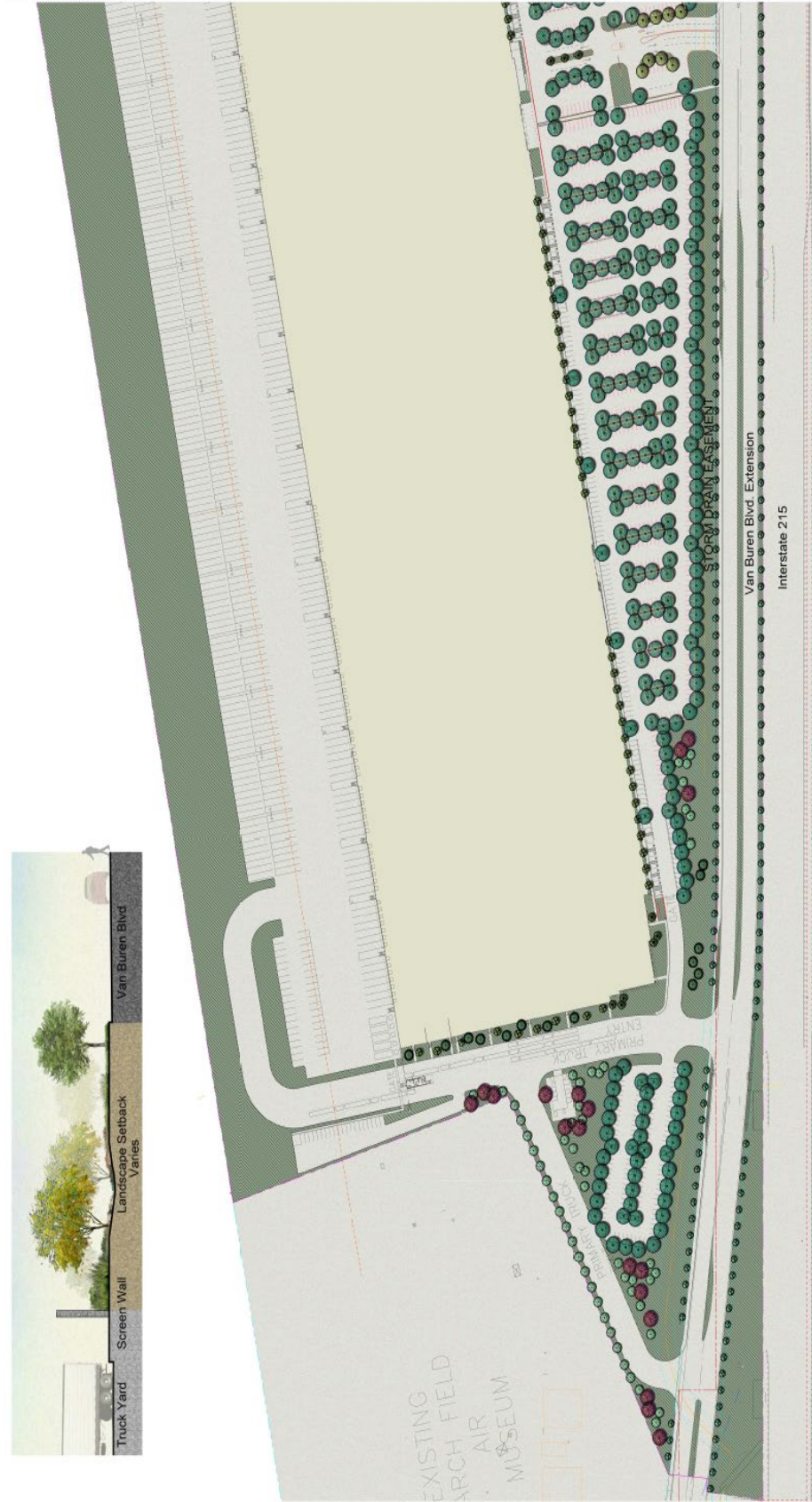
Plant Materials - Shrubs				
Botanical Name	Common Name	Size	WUCOLS	Remarks
Cistus 'Sunset Pink'	Sunset Pink Rockrose	5 Gal	M	
Callistemon "Little John"	Dwarf Bottle Brush	5 Gal	M	
Dietes bicolor	Fortnight Lily	5 Gal	M	
Leucophyllum spp.	Texas Ranger	5 Gal	L	
Ligustrum j. Texanum	Texas Privet	5 Gal	M	
Salvia c. 'Allen Chickering'	Allen Chickering Sage	5 Gal	L	
Salvia greggii	Autumn Sage	5 Gal	L	
Salvia leucantha	Mexican Sage	5 Gal	L	
Westrinia f. "Grey Box"	Coast Rosemary	5 Gal	L	
Senna artemisioides	Feathery Cassia	5 Gal	L	
Caesalpinia pulcherrima	Red Bird of Paradise	5 Gal	L	
Tecoma stans	Yellow Bells	5 Gal	L	
Artemisia spp.	Wormwood	5 Gal	L	
Rhamnus spp.	Coffeeberry	5 Gal	L	

Plant Materials - Accents				
Latin Name	Common Name	Size	WUCOLS	Remarks
Agave spp.	Agave	5 Gal	L	
Aloe spp.	Aloe	5 Gal	L	
Dasylerion wheeleri	Desert Spoon	5 Gal	L	
Hesperaloe parviflora	Red Yucca	5 Gal	L	
Opuntia spp	Prickly Pear	5 Gal	L	
Echinocactus grusonii	Golden Barrel Cactus	5 Gal	L	

Plant Materials - Groundcovers					
Latin Name	Common Name	Size	Spacing	WUCOLS	Remarks
Acacia redolens 'Desert Carpet	Dwarf Acacia	1 Gal	8' O.C.	L	
Festuca mairei	Altas Fescue	1 Gal	24" O.C.	M	Grass

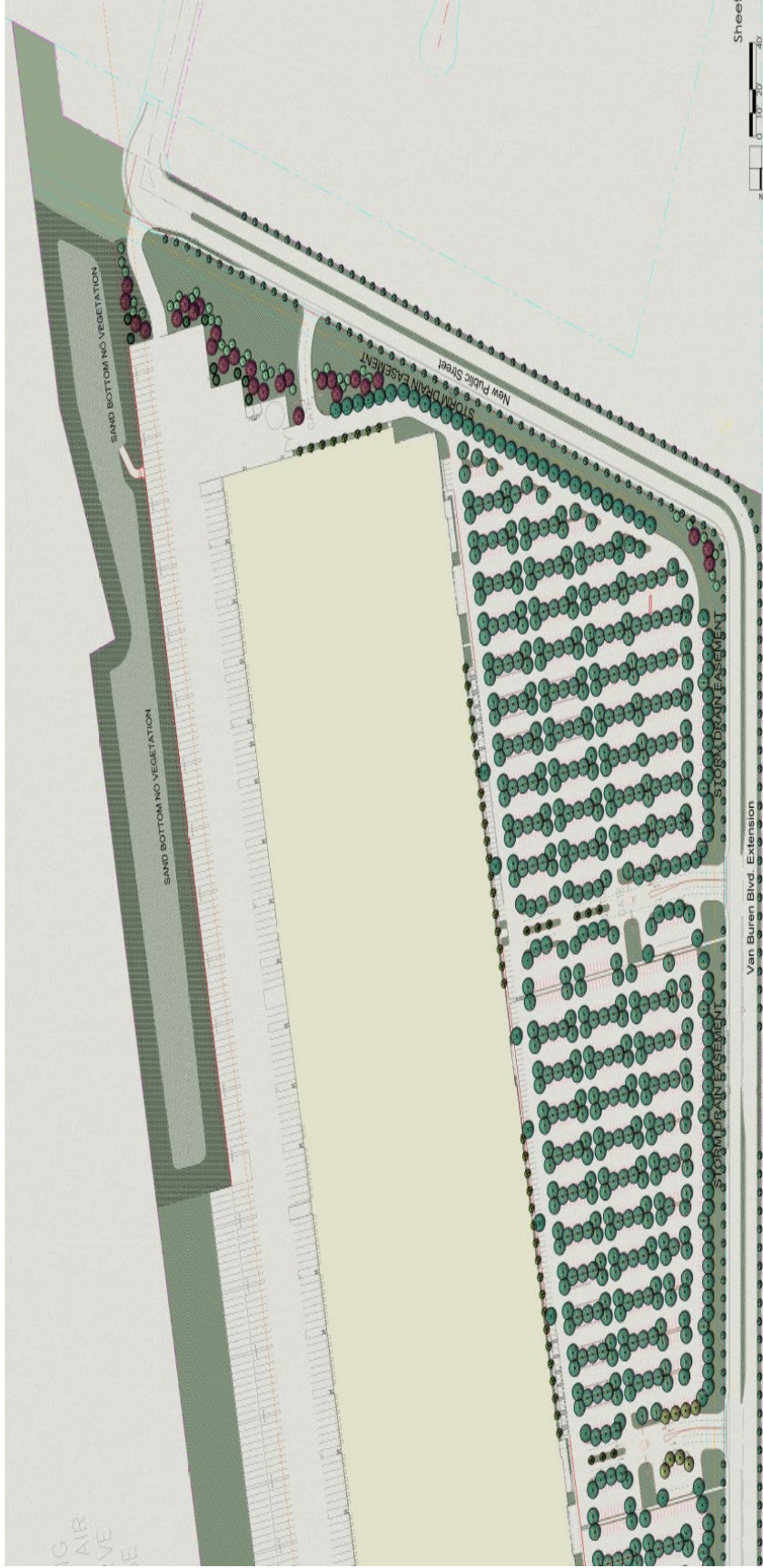
Mr. Smith
August 27, 2020
Page 5

<u>Festuca o. 'Glauca'</u>	<u>Blue Fescue</u>	<u>1 Gal</u>	<u>12" O.C.</u>	<u>M</u>	<u>Grass</u>
<u>Hemerocallis hybridus-Yellow</u>	<u>Yellow Day Lily</u>	<u>1 Gal</u>	<u>24" O.C.</u>	<u>M</u>	
<u>Lantana 'Gold Mound'</u>	<u>Yellow Lantana</u>	<u>1 Gal</u>	<u>36" O.C.</u>	<u>L</u>	<u>Non fruiting</u>
<u>Muhlenbergia capillaris</u>	<u>Pink Muhly</u>	<u>1 Gal</u>	<u>36" O.C.</u>	<u>L</u>	<u>Grass</u>
<u>Rosmarinus o. 'Huntington Carpet'</u>	<u>Prostrate Rosemary</u>	<u>1 Gal</u>	<u>48" O.C.</u>	<u>L</u>	



Source: Hunter Landscape

Figure 4-3 Planning Area 1 Conceptual Landscape Plan



Source: Hunter Landscape

Figure 4-4 Planning Area 2 Conceptual Landscape Plan

Table 4-2 Bioretention Basin Seed Mix	
Latin Name	Common Name
<i>Achillea millefolium</i>	Yarrow
<i>Eschscholzia caespitosa</i>	Foothill Poppy
<i>Juncus bufonius</i>	Toad Rush
<i>Leymus triteoides</i> Rio	Wild Rye
<i>Descampsia caespitosa</i>	Tufted hairgrass
<i>Festuca rubra</i> "Molate"	Red Fescue
<i>Hordium brachyantherum</i>	Meadow Barley
<i>Muhlenbergia rigens</i>	Deergrass

As stated above, the landscaping for the project has been modified based on input provided by the Riverside County ALUC during its consideration of the Single Building Option’s consistency with the adopted March Air Base/Inland Port ALUCP. The landscaping was modified to eliminate trees that would bear mast or grow to an adequate size for roosting so that potential conflicts between birds and aircraft are eliminated.

Based on comments received from Western Municipal Water District (WMWD) regarding water and sewer infrastructure to serve the proposed project, modifications to the infrastructure are proposed.

WMWD provided a comment letter dated April 29, 2020 (Comment Letter 7 of the Response to Comments). The comment letter stated that the existing water system that currently terminates at the northern boundary of the project site is at capacity and additional water is unavailable. The applicant’s engineer and WMWD discussed the issue and identified five options to provide adequate water service to the project site. One of the identified options (Option 5) is similar to the water facilities that are included as part of the proposed project. The proposed project anticipates water service to the site will be served by Western by means of the infrastructure alignment identified as “Option 5 of Water Distribution System” identified in WMWD’s letter dated August 7, 2020 (Comment Letter 7 of the Response to Comments) or equivalent water service infrastructure which provides, at a minimum, the same level of water supply and pressure as this alignment.

Option 5 as well as the proposed project includes an 18-inch water line along the southern and western sides of the onsite portion of the VIP 215 project and connects to the existing 12-inch line on the northern boundary of the onsite portion of the project. Option 5 as well as the proposed project includes the construction and operation of an 18-inch water line along Western Way between Harley Knox Boulevard and the project site. This 18-inch line would be an Eastern Municipal Water District (EMWD) line that would provide adequate pressure for fire flow. Although not required for the project as identified in WMWD’s email dated August 12, 2020 (Comment Letter 7 of the Response to Comments), WMWD is requesting the project applicant to install a 20-inch water line parallel to the 18-inch water line along Western Way between Harley Knox Boulevard and the project site. This proposed 20-inch line would not be operational until the existing Metropolitan Water District (MWD) 96-inch water line that is located along Western Way as well as along the southern and western sides of the project site is

Mr. Smith
August 27, 2020
Page 9

operational. The connection of the 20-inch line would eventually replace the need for the EMWD's 18-inch water line along Western Way. An illustration of the WMWD's water facilities Option 5 is provided within the August 7, 2020 WMWD comment letter (Comment Letter 7 of the Response to Comments). The 20-inch water line would be a separate WMWD project; however, the potential environmental effects of installing the 20-inch water line is discussed below under Additional Environmental Documentation.

The WMWD's comment letter dated April 29, 2020 also provided a discussion of the sewer facilities option that MWD is requesting to be part of the proposed project. The sewer facilities option is similar to Option 1 identified in the Draft EIR. However, the WMWD sewer option does not require an onsite lift station or a pipeline from the lift station that were identified within Option 1 of the Draft EIR. Similar to Option 1, the WMWD option includes a 10-inch water line that would extend under I-215 and the railway and connect to an existing 10-inch sewer line on the west side of the railway. All project sewer lines would convey wastewater to the proposed 10-inch sewer line similar to the project. The WMWD option includes the installation of an 18-inch sewer line within Van Buren Boulevard along the southern and southwestern sides of the project site. The 18-inch line would not connect to an existing or proposed sewer line, but would be available for future connections by WMWD without requiring the trenching within Van Buren Boulevard. In addition, the WMWD includes the installation of a 60-inch diameter steel casing under the I-215 and the railway. The proposed 10-inch line would extend under I-215 and the railway within the steel casing. In addition, although not required as part of the proposed project, the 18-inch sewer line would be extended within the steel casing when WMWD provides future connections as part of a later project. An illustration of the WMWD's sewer facilities is provided within the August 7, 2020 WMWD comment letter (Comment Letter 7 of the Response to Comments). The installation of the 18-inch sewer line along the southern and southwestern portions of Van Buren Boulevard as well as the construction of the 60-inch steel casing under the I-215 and railway is discussed below under Additional Environmental Documentation.

Additional Environmental Documentation

The additional facilities identified above that were not evaluated within the Draft EIR includes the revisions to the landscaping and additional water and sewer facilities. The additional water facility is a 20-inch water line along Western Way between Harley Knox Boulevard and the project site parallel to the previously evaluated 18-inch water line along Western Way. The additional sewer facilities include an 18-inch sewer line along Van Buren Boulevard proposed along the southern and southwestern portions of the project site and a 60-inch steel casing under I-215 and the railway. The 60-inch casing is proposed in the same location as the 10-inch sewer line that was evaluated within the Draft EIR.

Mr. Smith
August 27, 2020
Page 10

These modifications to the project would occur under the High Cube Warehouse Use (Two Buildings Option) and Intensive Ecommerce Use (Both Two Buildings and Single Building Options). Following is a discussion of the environmental issues associated with the modifications.

Aesthetics

The proposed modification to the project are planned in the same general areas as the improvements evaluated in the Draft EIR. The landscaping modifications include the elimination of trees and the provision of groundcover and shrubs. In addition, the proposed landscaping modifications include the removal of vegetation within the retention basins and include sand bottoms. The 20-inch water line proposed along Western Way would include similar construction activities as the proposed 18-inch water line evaluated in the Draft EIR. The proposed 18-inch sewer line along the southern and southwestern portions of the project site within the right-of-way of the proposed Van Buren Boulevard would be located in the same locations as surface impacts that were evaluated in the Draft EIR. The 60-inch casing is proposed in the same location as the 10-inch sewer line that was evaluated within the Draft EIR. The implementation of these improvements would not result in greater impacts to scenic vistas, visual character, and light and glare than the impacts that were evaluated in the Draft EIR.

Air Quality

The construction activities associated with the modified improvements would result in greater soil excavation activities than those addressed in the Draft EIR. The proposed 20-inch water line along Nandina Avenue would result in approximately 385 cubic yards. The proposed 18-inch sewer line would result in approximately 185 cubic yards, and the 60-inch steel casing would result in approximately 220 cubic yards. The total increase in soil excavation would be approximately 790 cubic yards. This increase in soil excavation compared to the soil excavation evaluated in the Draft EIR represents a 0.6 percent increase compared to the Two Buildings Option and 0.4 percent increase compared to the Single Building Option. These increases are nominal and would not result in new significant impacts or a substantial increase in the severity of the previously evaluated air quality impacts.

Biological Resources

The construction of the modified improvements would not result in the removal of additional biological resources than the resources that were evaluated in the Draft EIR. Each of the improvements are located in areas that either would have been disturbed under the project evaluated in the Draft EIR or in areas that do not contain biological resources such as along the existing pavement of Western Way south of Nandina Avenue or under the I-215 and railway. Therefore, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated biological resources impacts.

Cultural Resources and Tribal Cultural Resources

The construction of the modified improvements will increase excavation activities that could result in potential impacts to cultural resources and tribal cultural resources; however, with the implementation of Mitigation Measures CUL-1 through CUL-4 that are provided in Section 3.4 of the Draft EIR would reduce potential impacts to less than significant similar to the improvements evaluated in the Draft EIR. Therefore, the proposed

Mr. Smith
August 27, 2020
Page 11

modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated cultural resources and tribal cultural resources impacts.

Geology, Soils and Seismicity

Because the implementation of the proposed modifications would be located in the same general area as the improvements evaluated in the Draft EIR, the potential impacts related to earthquakes, soil erosion or topsoil loss, unstable geologic location, and expansive soils would be the same as those evaluated in the Draft EIR. Therefore, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated geology, soils and seismicity impacts.

Greenhouse Gas Emissions

Construction of the additional modified project facilities would increase greenhouse gas emissions (GHG). The Draft EIR has identified that the construction activities associated with the Two Buildings Option would be approximately 96 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year and with the Single Building Option would be approximately 122 MTCO_{2e} per year. The total construction and operational GHG emissions for the Two Buildings Option would be approximately 36,269 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year as identified on page 3.6-24 of the Draft EIR and with the Single Building Option would be approximately 61,745 MTCO_{2e} per year as identified on page 3.6-27 of the Draft EIR. As shown, the construction GHG emissions are a nominal amount of the total annual GHG emissions associated with the project. Therefore, the implementation of the additional modified project facilities would represent a nominal increase in annual GHG emissions. As a result, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated GHG emissions impacts.

Hazards and Hazardous Materials

Because the implementation of the proposed modifications would be located in the same general area as the improvements evaluated in the Draft EIR, the potential impacts related to hazards and hazardous materials would be the same as those evaluated in the Draft EIR. The implementation of Mitigation Measures HAZ-1 and HAZ-2 that are identified in the Draft EIR would be similarly required with the proposed modifications. Therefore, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated hazards and hazardous materials impacts.

Hydrology and Water Quality

Construction and operation of the modified improvements would occur in the same general locations of the project components that were evaluated in the Draft EIR and would not substantially alter the hydrological conditions within the onsite and offsite portions of the project. The proposed modifications related to removal of vegetation within the proposed detention basin(s) would alter the treatment of water quality BMP for the project; however, the proposed modification includes a sand bottom to the detention basin and would continue to allow storm water to pass through a filter media, wash stone section and through a perforated pipe network beneath the basin footprint. As a result, the proposed modifications would not result in new significant hydrology and water quality impacts or a substantial increase in the severity of the previously evaluated hydrology and water quality impacts.

Mr. Smith
August 27, 2020
Page 12

Land Use and Planning

Implementation of the proposed modifications do not result in land use and planning issues because the proposed modifications which include utility improvements do not raise policy consistency issues. In addition, the modification to the landscape plan by limiting trees on the project site and including groundcover and shrubs would also not raise policy consistency issues. Therefore, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated land use and planning impacts.

Noise

The construction activities associated with the proposed modifications would include additional sources of construction noise levels. However, the construction noise levels associated with the proposed modifications would be similar to the construction noise levels currently evaluated in the Draft EIR. The construction noise levels associated with the proposed modifications would not exceed the construction daily construction noise levels at the nearby sensitive uses as shown in Table 3.10-13 on pages 3.10-30 and 3.10-31 of the Draft EIR. No increases in long term operational noise levels would occur with the proposed modifications. Therefore, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated noise impacts.

Public Services

The implementation of the proposed modifications would not result in adverse impacts to public services such as fire protection, police protection, schools, parks and other public facilities. The provision of the additional 20-inch parallel water line along Western Way would provide increased reliability in provide adequate water to the project site. Therefore, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated public services impacts.

Recreation

The proposed modification are revisions to landscaping and utilities and would not impact recreational facilities. Therefore, the proposed modifications would not result in new significant impacts or a substantial increase in the severity of the previously evaluated recreation impacts.

Transportation

The implementation of the proposed modifications would not result in daily trips to the project site; however, there may be maintenance trips that may occur periodically. The construction activities would increase construction trips on the adjacent roadways. As identified above under the Air Quality discussion, the Two Buildings Option and Single Building Option would increase soil export by approximately 790 cubic yards. Based on the capacity of a haul truck of 15 cubic yards, the additional soil export would result in an increase of approximately 53 haul truck trips. This increase in construction truck trips represents a 0.6 percent increase in haul truck trips compared to the Two Buildings Option and 0.4 percent increase in construction haul truck trips compared to the Single Building Option. These increases are nominal and would not result in new significant impacts or a substantial increase in the severity of the previously evaluated traffic impacts.

Mr. Smith
August 27, 2020
Page 13

Utilities, Service Systems and Energy

The implementation of the proposed landscaping and utility modifications would result in nominal effects related to utilities, service systems and energy. The modifications to landscaping would alter the amount of irrigation water required by the project; however, the potential change in water use for landscaping would be considered nominal compared to the estimated 109 acre-feet of water per year for the proposed project. In addition, the proposed water and sewer utility modifications would improve the reliability of water and sewer service. No changes to storm water drainage, wastewater treatment, or landfill capacity would occur with the proposed modifications.

The construction activities associated with the proposed modifications would increase energy use in the form of vehicle fuel and electricity; however, these increases would be nominal compared to the amount of energy evaluated within the Draft EIR. These increases are nominal and would not result in new significant impacts or a substantial increase in the severity of the previously evaluated utility, service systems and energy impacts.

Summary of Additional Environmental Evaluation

As discussed above, the additional environmental evaluation of modifications to the project did not result in new significant information as defined in Section 15088.5 of the CEQA Guidelines. Therefore, a recirculation of the Draft EIR is not required.

Sincerely,



Michael Houlihan, AICP
Principal Associate

