DRAFT

West Campus Upper Plateau Project
Recirculated Draft Environmental Impact Report
State Clearinghouse No. 2021110304

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
ACC	Advanced Clean Cars
ACMs	asbestos-containing materials
AD	Abandoned Drainages
ADT	average daily trips
AERMOD	U.S. Environmental Protection Agency Regulatory Model
AFB	Air Force Base
AFY	acre-feet per year
AI	Action Item
AICUZ	Air Installation Compatible Use Zone
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMSL	above mean sea level
ANSI	American National Standards Institute
APE	Area of Potential Effects
APN	Assessor's Parcel Number
APSA	Aboveground Petroleum Storage Act
APZ	Accident Potential Zone
AQMP	Air Quality Management Plan
ARB	Air Reserve Base
IPA	Inland Port Airport
AST	aboveground storage tank
ATP	Archaeological Testing Plan
BMPs	Best management practices
BO	Biological Opinion
BP	Business Park
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAIT	Climate Analysis Indicator Tool
CalARP	California Accidental Release Prevention Program
CalEPA	California Environmental Protection Agency
CALGAPS	California LBNL GHG Analysis of Policies Spreadsheet
CalOSHA	California Occupational Safety and Health Administration
CalSTA	California State Transportation Agency
CAP	Climate Action Plan
CARB	California Air Resources Board
CBC	California Building Code
CBD	Center for Biological Diversity
CCR	California Code of Regulations
CDFA	California Department of Food and Agriculture
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission

Acronym/Abbreviation	Definition
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFC	California Fire Code
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CHP	California Highway Patrol
CH	chlorinated herbicide
CIP	capital improvement program
CIWMB	California Integrated Waste Management Board
CMUs	constructed of concrete masonry units
CNEL	community noise equivalent level
CNRA	California Natural Resources Agency
CO	carbon monoxide
CO_2	carbon dioxide
CPEP	Clean Power and Electrification Pathway
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRMP	Cultural Resources Monitoring Plan
CRRC	Cool Roof Rating Council
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
DEH	Department of Environmental Health
DIF	development impact fee
DPM	Diesel particulate matter
EIC	Eastern Information Center
EIR	Environmental Impact Report
EMWD	Eastern Municipal Water District
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmentally Sensitive Areas
ESL	Environmental Screening Level
EVA	emergency vehicle access
FAA	Federal Aviation Administration
FAR	floor area ratio
FE	Federally Endangered
FEMA	Federal Emergency Management Agency
FESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FMZ	Fuel Modification Zone
FPP	Fire Protection Plan
FRAP	Fire and Resource Assessment Program
FRA	Federal Responsibility Area

Acronym/Abbreviation	Definition
FT	Federally Threatened
FTA	Federal Transit Administration
FTIP	Federal Transportation Improvement Plan
GCC	Global climate change
GHG	greenhouse gas
GWP	global warming potential
H_2S	Hydrogen sulfide
HAP	hazardous air pollutant
HBW	home-based work
HCD	Housing and Community Development
HCOC	Hydrologic Conditions of Concern
HERO	Human and Ecological Response Office
HERS	home energy rating system
HFC	hydrofluorocarbon
HFHSZ	High Fire Hazard Severity Zone
HI	hazard index
HMBP	Hazardous Materials Business Plan
HMIS	Hazardous Material Inventory Statements
HMMP	Habitat Mitigation and Monitoring Plan
HPS	High-Pressure
HPTP	Historic Properties Treatment Plan
HVAC	heating, ventilation, and air conditioning
I	Interstate
IEPR	Integrated Energy Policy Report
IP	Inland Port
IRP	Integrated Resource Planning
JPA	Joint Powers Authority
JPC	Joint Powers Commission
LBNL	Lawrence Berkeley National Laboratory
LBP	lead-based paint
LCFS	Low-Carbon Fuel Standard
LDT1	light-duty-trucks
LDT2	light-duty-trucks
LID	low-impact development
LLMD	Lighting and Maintenance District
LOS	level of service
LRA	Local Responsibility Area
LST	localized significance threshold
LUST	Leaking Underground Storage Tank
MDP	Master Drainage Plan
MEIR	maximally exposed individual receptor
MEISC	maximally exposed individual school child
MEIW	maximally exposed individual worker
MG	million gallon
MHDT	medium-heavy duty trucks
MLD	Most Likely Descendant
MM	Mitigation Measure

Acronym/Abbreviation	Definition
MMT	million metric tons
MPO	metropolitan planning organization
MRZ-3	Mineral Resource Zone 3
MS4	Municipal Separate Storm Sewer System
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric tons
MU	Mixed Use
MWELO	Model Water Efficient Landscape Ordinance
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Planning
NDCs	nationally determined contributions"
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NHTSA	National Highway Traffic Safety Administration
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
O_3	ozone
OCP	organochlorine pesticide
OHWM	ordinary high water mark
OPR	Office of Planning and Research
P/R/OS	Park/Recreation/Open Space
PCB	Polychlorinated biphenyl
PDF	Project Design Feature
P-E	population to employment
PF	Public Facility
PFC	perfluorocarbon
PM_{10}	particulate matter less than 10 microns in diameter
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter
PPV	peak particle velocity
PRC	Public Resources Code
PUC	Public Utilities Code
PV	photovoltaic
QAWB	Qualified Airport Wildlife Biologist
RCFCWCD	Riverside County Flood Control and Water Conservation District
RCFD	Riverside County Fire Department
RCHCA	Riverside County Habitat Conservation Agency
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RFD	Riverside Fire Department
RFS	Renewable Fuel Standard

Acronym/Abbreviation	Definition
RHNA	Regional Housing Needs Allocation
RMS	root mean square
RPS	Renewables Portfolio Standard
RSL	regional screening level
RTA	Riverside Transit Authority
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SAC	Strategic Air Command
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCS	Sustainable Communities Strategy
SE	State Endangered
SED	socio-economic data
SEER	season energy efficiency ratio
SF	square feet
SF_6	sulfur hexafluoride
SGC	Strategic Growth Council
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Office
SHRC	State Historical Resources Commission
SLF	Sacred Lands File
SLPS	Short-Lived Climate Pollutant Strategy
SO_4	Sulfates
SPCC	spill prevention, control, and countermeasure
SRA	Source Receptor Area
SSC	Species of Special Concern
ST	State Threatened
STP	shovel test pit
SVOC	semi-volatile organic compound
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TA	Traffic Analysis
TAC	Toxic Air Contaminant
TAZ	traffic analysis zone
TCL	Traditional Cultural Landscape
TCP	Traditional Cultural Property
TCR	tribal cultural resource
TDM	Transportation Demand Management
TMDL	total maximum daily load
TPH	total petroleum hydrocarbons
TRU	trailer refrigeration unit
TSCA	Toxic Substances Control Act
TUMF	Transportation Uniform Mitigation Fee

Acronym/Abbreviation	Definition
TWA	time-weighted average
UBC	Uniform Building Code
UCR	University of California, Riverside
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	Urban Water Management Plan
UXO	unexploded ordinance
VICS	Voluntary Interindustry Commerce Solutions
VMT	vehicle miles traveled
VOC	volatile organic compound
WEAP	Worker Environmental Awareness Program
WL	Watch List
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments
WRCRWA	Western Riverside County Regional Wastewater Authority
WSA	Weapons Storage Area
WUI	Wildland Urban Interface
WWRF	Western Water Recycling Facility

2 Introduction

2.1 Recirculation

2.1.1 Overview

This document includes the recirculated sections of the Draft Environmental Impact Report (EIR) for the proposed West Campus Upper Plateau Project (Project). The Draft EIR for the proposed Project was circulated by the lead agency (March Joint Powers Authority [JPA]) for a 60-day public review and comment period from January 9, 2023, to March 10, 2023, in compliance with the California Environmental Quality Act (CEQA) Guidelines Section 15085. During this time, numerous comment letters were received from government agencies, interested parties, and private individuals. Additionally, March JPA prepared a Draft Environmental Justice Element for the 1999 March JPA General Plan. As such, this recirculated Draft EIR includes the following:

- Chapter 2.0, Introduction
- Chapter 3.0, Project Description
- Section 4.2, Air Quality
- Section 4.8, Hazards and Hazardous Materials
- Section 4.10, Land Use and Planning

Section 15088.5(a) of the CEQA Guidelines states, "[a] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification." Section 15088.5(a) further states that "new information added to an EIR is not 'significant' unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect." Because March JPA has prepared a Draft Environmental Justice Element for the 1999 March JPA General Plan, and because additional analysis of impacts related to air quality and hazardous materials has been completed, select portions of the Draft EIR are being recirculated to provide the public with a meaningful opportunity to comment on these environmental topics.

In accordance with Section 15087 of the CEQA Guidelines, these revised sections of the Draft EIR will be available for review and comment by the public and other interested parties, agencies, and organizations for 45 days. As part of the Final EIR, March JPA will respond to comments specifically and solely focused on the recirculated sections of the Draft EIR. Additionally, March JPA will provide responses to comments received during the earlier circulation period regarding the environmental topics, EIR sections, or appendices. All comments or questions about the recirculated sections of the Draft EIR should be addressed to the following:

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Email: fairbanks@marchjpa.com

2.1.2 Summary of Revisions

Section 15088.5(g) of the CEQA Guidelines requires that, "when recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated Draft EIR." This section provides the information required by Section 15088.5(g) of the CEQA Guidelines. Revisions are identified throughout the recirculated sections as follows: deletions are marked with ~~strikeout~~ and additions are marked with double underline.

Chapter 2, Introduction

This chapter of the Draft EIR is being revised to include the following:

- Explanation of recirculation
- Summary of revisions to the Draft EIR

Chapter 3, Project Description

This chapter of the Draft EIR is being revised to include the following:

- Corrected number of bunkers currently located on the Project site
- Explanation of cold storage analysis for Industrial parcels
- Correction in text and figure regarding construction activities related to the off-site 0.5-million-gallon reclaimed water tank
- Update to Project Design Features to reflect revisions made in Section 4.2, Air Quality
- Addition of text and figure regarding construction staging areas
- Revisions to Project construction timeframes to be consistent with assumptions and text in Section 4.2, Air Quality
- Addition of Development Agreement details regarding the Park and construction of the Meridian Fire Station
- Explanation of the Draft Environmental Justice Element of the 1999 March JPA General Plan
- Corrected figures in order to consistently present the Project site plan

Section 4.2, Air Quality

This section of the Draft EIR is being revised to include the following:

- Incorporation of revised analysis from the revised Air Quality Technical Report (Appendix C-1) and revised Health Risk Assessment Technical Report (Appendix C-2)
- Addition of the South Coast Air Quality Management District and San Joaquin Valley Unified Air Pollution Control District Amicus Curiae Briefs in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (Appendix C-3)
- Addition of applicable policies of the March JPA Draft Environmental Justice Element and City of Riverside Good Neighbor Guidelines for Siting New and/or Modified Industrial Facilities
- Conversion of **PDF-AQ-1** through **PDF-AQ-3** from Project Design Features to Mitigation Measures
- Addition of mitigation measures to further reduce identified air quality impacts
- Additional analysis related to cumulative effects

- Addition of figure illustrating modeled sensitive receptor locations and distances
- Addition of figure illustrating cumulative projects relevant to the cumulative toxic air contaminants impacts analysis

Section 4.8, Hazards and Hazardous Materials

This section of the Draft EIR is being revised to include the following:

- Incorporation of Appendix J-5
- Incorporation of findings of the 2023 Supplemental Environmental Assessment Report (Appendix J-6)
- Incorporation of previously completed unexploded ordnance analysis
- Incorporation of additional references cited in the analysis

Section 4.10, Land Use and Planning

This section of the Draft EIR is being revised to include the following:

- Discussion of the March ARB Master Reuse Plan
- Expanded discussion of the March JPA General Plan in relation to the Project site
- Discussion of the March JPA Draft Environmental Justice Element
- Discussion of the Riverside County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses
- Table 4.10-1:
  - Consistency analysis for General Plan policies identified in other EIR sections and Draft Environmental Justice Element
  - Revisions related to recirculated Section 4.2, Air Quality, and Section 4.8, Hazards and Hazardous Materials
- Consistency analysis with the Good Neighbor Policy for the County of Riverside

2.2 Purpose and Scope

The purpose of this Environmental Impact Report (EIR) is to evaluate and disclose the potential environmental consequences of the proposed West Campus Upper Plateau Project (Project). The proposed Project constitutes a "project" as defined in the California Environmental Quality Act (CEQA) Guidelines Section 15378. The March Joint Powers Authority (JPA) is the lead agency preparing this EIR in accordance with the CEQA statutes (California Public Resources Code Section 21000 et seq.), the California CEQA Guidelines (14 CCR 15000 et seq.) and the March JPA's 2022 Local CEQA Guidelines (March JPA 2022a).

As discussed in detail in Chapter 3, Project Description, of ~~this~~ the Draft EIR, the proposed Project includes the proposed buildout of a Specific Plan Area and the establishment of a Conservation Easement in compliance with the Center for Biological Diversity Settlement Agreement (Appendix S). ~~This EIR~~The Draft EIR evaluates implementation of the Specific Plan at a project level. The proposed Specific Plan Area buildout of the Specific Plan as analyzed in ~~this~~ the Draft EIR would include the following:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use

- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facilities – 2.84 acres for future sewer lift station and electrical substation

Buildout of the Specific Plan Area would also include the extension of Cactus Avenue from its existing western terminus through a loop roadway system surrounding the centrally located Industrial parcels. Additionally, Barton Street would be extended from Alessandro Boulevard to the north to connect to Grove Community Drive to the south to provide access to the new park in the western portion of the Specific Plan Area consistent with the City of Riverside General Plan Circulation Element. The Specific Plan Area's loop roadway system would include the construction of Arclight Drive, Airman Drive, Bunker Hill Drive, and Linebacker Drive. The Conservation Easement would provide an additional buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.

2.~~2~~3 Compliance with CEQA

2.~~2~~3.1 Format

This chapter of this EIR sets forth the summary requirements of CEQA as required by Section 15123 of the CEQA Guidelines. Chapter 1, Executive Summary, and Chapter 3, Project Description, also comply with CEQA project description requirements by discussing the Project location, providing a statement of the document's purpose and intended use, and identifying the Project objectives.

Issues identified in the Initial Study prepared for the Project that were found to have no impact or a less than significant impact are provided in Appendix A, Initial Study and Notice of Preparation (NOP), and in Chapter 5, Other CEQA Considerations, of ~~this~~ the Draft EIR ~~document~~. ~~This~~ The Draft EIR has been formatted to address the issues found to be potentially significant in the Initial Study. For the issue areas found to be potentially significant in the Initial Study, there is a corresponding EIR section. Each EIR section includes an existing setting discussion that describes the physical environmental conditions within the Project area as they existed at the time the NOP was prepared, in November 2021; these conditions are considered the baseline physical conditions from which the March JPA determines whether an impact is considered to be significant (CEQA Guidelines Section 15125[a]). Section 15125(d) of the CEQA Guidelines requires that an EIR "discuss any inconsistencies between the project and applicable general plans and regional plans," which will be addressed in Section 4.10, Land Use and Planning. Each EIR section identifies thresholds of significance and includes an analysis to determine the amount and degree of impact relative to each significance threshold that is associated with the Project. For all significant environmental impacts, mitigation measures, where feasible, are required in order to minimize significant adverse impacts (CEQA Guidelines Section 15126.4[a][1]).

The analysis of impacts and identification of mitigation measures are derived from technical reports that are included as technical appendices to ~~this~~ the Draft EIR and from other informational resources as listed at the end, in the references subsection, within each section of this document.

The originally circulated Draft EIR and these recirculated EIR sections are intended for use by decision makers (i.e., March JPA Commission), other public agencies, and the general public. They provide relevant information concerning the potential environmental effects associated with construction and operation of the Project.

2.~~2~~3.2 Environmental Procedures

The basic purposes of CEQA are the following (CEQA Guidelines Section 15002):

1. Inform governmental decisionmakers and the public about the potential significant environmental effects of proposed activities;
2. Identify the ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, unavoidable damage to the environment by requiring changes in the project through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The EIR process typically consists of three parts: (1) the NOP (including the Initial Study), (2) the Draft EIR, and (3) the Final EIR. Pursuant to Section 15063 of the CEQA Guidelines, the March JPA prepared an Initial Study (Environmental Checklist) for the Project in order to determine if the Project would have a significant effect on the environment. The NOP was intended to encourage interagency communication concerning the proposed action and provide sufficient background information about the proposed action so that agencies, organizations, and individuals could respond with specific comments and questions on the scope and content of the EIR. Based upon the analysis contained in the Initial Study/NOP, the March JPA concluded that an EIR should be prepared. The NOP for the EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on Friday, November 19, 2021. Pursuant to Section 15082 of the CEQA Guidelines, recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. During the 30-day public review period of the NOP, March JPA held a Scoping Meeting on December 8, 2021, to gather additional public input on the Project. Copies of the NOP (including the Initial Study) and the NOP distribution list are provided in Appendix A. All comments received during the NOP public notice period were considered during the preparation of this EIR. Written comments received on the NOP are included in Appendix A of this EIR.

Based on the scope of analysis for this EIR, including comments received during the NOP public scoping period, the following issues were determined to be potentially significant and are therefore addressed in Chapter 4, Environmental Impact Analysis, of ~~this document~~ the Draft EIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

Other potential environmental impact areas, such as agriculture/forestry and mineral resources, were not found to be significant based on the results of the Initial Study. These issues are addressed in Section 5.2, Effects Found Not To Be Significant, of ~~this~~ the Draft EIR.

As the lead agency for the Project, the March JPA has assumed responsibility for preparing ~~this~~ the Draft EIR. The decision to consider the Project is within the purview of the March Joint Powers Commission. The March JPA will use the information included in ~~this~~ the Draft EIR to consider potential impacts to the physical environment associated with the Project when considering approval of the Project. As set forth in Section 15021 of the CEQA Guidelines, the March JPA, as lead agency, has the duty to avoid or minimize environmental damage where feasible. Furthermore, Section 15021(d) states that:

> CEQA recognizes that in determining whether and how a Project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a Project that will cause one or more significant effects on the environment.

In accordance with CEQA, the lead agency will be required to make findings for each environmental impact of the Project that cannot be mitigated to a less-than-significant level. If the lead agency determines that the benefits of the Project outweigh significant environmental effects that cannot be mitigated to a less-than-significant level, the agency will be required to adopt a statement of overriding considerations stating the reasons supporting its action notwithstanding the Project's significant environmental effects.

The Draft EIR was made available for public review for 60 days between January 9, 2023, and March 10, 2023, and this Recirculated Draft EIR will be made available for review to agencies and the public for 45 days to provide comments on the "sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the Project might be avoided or mitigated" (CEQA Guidelines Section 15204[a]).

2.~~2~~3.3 Incorporated by Reference

The General Plan of the March Joint Powers Authority (March JPA 1999a), the Master Environmental Impact Report for the March Joint Powers Authority (March JPA 1999b), the March ARB/Inland Port Airport Land Use Compatibility Plan (Mead & Hunt 2014), and other references were reviewed in order to assist environmental review of the Project. These aforementioned documents are incorporated by reference (CEQA Guidelines 15150) and are available for review at the March JPA, 14205 Meridian Parkway, Suite 140, Riverside, California 92518. Additionally, these documents can be viewed on or downloaded from the March JPA's website at https://marchjpa.com/mjpa-meridian-west-campus/.

2.~~2~~3.4 NOP Comments and Scoping Meeting

The NOP for the Project was published on November 19, 2021, which will thus be the environmental baseline for the Project. Currently, existing development within the site consists of a water tower, asphalt paved and dirt access roads, seven buildings in various states of abandonment, chain-link fencing, and 14~~16~~ bunkers that were previously used for munitions storage by the Air Force. All of the bunkers are currently used by Pyro Spectaculars Inc. for the

storage of fireworks. The remainder of the Project site is generally unoccupied; however, existing trails are used by the public for recreational use consistent with the terms of the 2012 Settlement Agreement. The public review period for the Initial Study/NOP began on November 19, 2021, and ended on December 20, 2021. A number of agencies and organizations commented on the Initial Study/NOP, and those comments can be found in Appendix A. During the 30-day public review period of the NOP, March JPA held a Scoping Meeting on December 8, 2021. Discussion at the December 8, 2021, Scoping Meeting included concerns regarding transportation and traffic impacts on surrounding roadways. Comments raised in comment letters during the 30-day scoping period are summarized in Table 2-1.

Table 2-1. NOP Comments

Commenter	Date	Comments
Riverside County Airport Land Use Commission	11/23/2021	• The Project site is located within Zones B1, B2, C1, and C2 of the March AIA, and review by ALUC is required • Need to complete Application for Major Land Use Action Review
South Coast Air Quality Management District	12/07/2021	• Construction and operational air quality analysis needed • Consider performing a mobile source health risk assessment • Incorporate mitigation measures as necessary
City of Riverside, Community Development Department	12/20/2021	• Mixed use areas should have direct access to Barton Drive • Barton Drive and Cactus Avenue should not intersect • Consider a potential future City of Riverside police station on the Project site • The Traffic Engineering Division would like to review the Project's Traffic Impact Analysis Study • Consider including trails in recreational and open space areas • Indicate when the 10-acre park would be developed • Request for a Fire Fuel Management Plan
United States Air Force	12/20/2021	• Former landfill area will remain undeveloped by the Project • An unexploded ordinance (UXO) survey and clearance should be conducted
City of Moreno Valley	12/17/2021	• EIR needs to address cumulative impacts upon City of Moreno Valley • The City would like to review the Traffic Study Scoping Agreement as well as the Traffic Study
Riverside County Flood Control and Water Conservation District	12/09/2021	• The District has not reviewed the proposed Project in detail • The Project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed • An encroachment permit should be obtained for any construction related activities occurring within District right-of-way or facilities, namely the March Business Center Storm Drain and Detention Basin
CARE CA	12/20/2021	• Each Project component should have its own specific CEQA review, mitigation measures, and certification • Ensure an accurate and adequate Project Description is included in the EIR • How much Industrial use would be developed, in total • Air quality analyses and mitigation measures needed

Table 2-1. NOP Comments

Commenter	Date	Comments
Riverside County Department of Waste Resources	12/21/2021	• Buildout of the Project may have the potential to increase the amount of waste that could adversely affect solid waste facilities. Draft EIR should assess this • Consider measures to reduce waste at the Project site
Riverside County Flood Control and Water Conservation District	12/21/2021	• The EIR should evaluate and address any potential impacts to existing and planned Perris Valley Master Drainage Plan facilities and/or District owned properties • Consider impacts associated with long-term operations and maintenance of facilities if the District will ultimately provide these services • Please list the District as a CEQA Responsible Agency in the EIR if an encroachment permit may be required • The Project is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), under which the District is a Permittee to the plan
Southwest Carpenters	12/20/2021	• Additional community benefits should be incorporated into the Project • Local hire and skilled and trained workforce requirements should be incorporated into the Project • An EIR should be prepared in compliance with CEQA
CALFIRE/Riverside County Fire Department	12/17/2021	• Station 11 is owned and maintained by the City of Riverside • Does the JPA have a site set aside for a future fire station

Source: March JPA 2022b.

None of the comments received change the issue areas that the Initial Study determined would be discussed in the EIR. All of the issues and concerns raised in the comments have been fully addressed and analyzed in the EIR.

2.~~3~~4 References Cited

March JPA (Joint Powers Authority). 1999a. *General Plan of the March Joint Powers Authority*.

March JPA. 1999b. *Master Environmental Impact Report for the General Plan of the March Joint Powers Authority*. Final. SCH No. 97071095. September 1999.

March JPA. 2022a. CEQA Guidelines 2022: Local Guidelines for Implementing the California Environmental Quality Act. Accessed October 1, 2021. https://www.marchjpa.com/documents/docs_forms/2022_CEQA_GUIDELINES.pdf

March JPA. 2022b. West Campus Upper Plateau Specific Plan No. 9. Prepared by T&B Planning, Inc. June 2022.

Mead & Hunt. 2014. March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, Volumes I and II. Prepared for the Riverside County Airport Land Use Commission. Santa Rosa, California: Mead & Hunt. November 13, 2014. Accessed October 1, 2021. http://www.rcaluc.org/Plans/New-Compatibility-Plan

3 Project Description

This recirculated chapter describes the objectives of the proposed West Campus Upper Plateau Project (Project) and Environmental Impact Report (EIR) and provides a detailed description of Project characteristics. This chapter also discusses the discretionary actions required and includes a brief description of the environmental effects, which are evaluated in Chapter 4, Environmental Impact Analysis, through Chapter 6, Alternatives, of this EIR.

3.1 Project Location

The proposed Project site includes the Specific Plan Area and the Conservation Easement, as described in greater detail in Section 3.5, Proposed Project. The Project site comprises approximately 818 acres within the March Joint Powers Authority (JPA) planning area, located approximately half a mile west of Interstate (I) 215. The approximately 818-acre area is comprised of 370 acres for the Specific Plan Area, 3 acres for an existing public facility, and 445 acres for the Conservation Easement. More specifically, the Project site is in the western portion of the March JPA planning area, west of Cactus Avenue's current terminus, to the east and south of the Mission Grove neighborhood, and to the north of the Orangecrest neighborhood in the City of Riverside, California (Figure 3-1, Project Location). The Specific Plan Area would include the extensions of Cactus Avenue, Brown Street, and Barton Street. The latitude and longitude of the approximate center of the Project site is 33.906375″ north and −117.305077″ west. The Project site is in Township 3 South, Range 4 West, including Sections 15, 16, 17, 20, 21, 22 within the Riverside East 7.5-minute quadrangle, as mapped by the U.S. Geological Survey. The Specific Plan Area is located within the following 13 Assessor's Parcel Numbers: 276-120-001, 276-170-007, 294-020-001, 297-080-003, 297-080-004, 297-090-001, 297-090-002/-003/-004/-007/-008/-009, and 297-100-093. The Conservation Easement is located within the following 19 Assessor's Parcel Numbers: 276-120-001, 276-170-007, 294-020-001/-002, 294-040-031/-038, 297-080-002/-003/-004/-005, 297-090-002/-003/-004/-005/-006/-007/-008/-009, and 297-110-036.

Existing development within the Project site consists of a non-operational water tower, an existing Eastern Municipal Water District (EMWD) water tank, paved and dirt access roads, and 14~~6~~ bunkers and related structures that were previously used for munitions storage by the Air Force prior to March AFB's selection for realignment in 1993. All of the bunkers are currently used by Pyro Spectaculars Inc. for the storage of fireworks. While the Specific Plan Area primarily encompasses existing development and previously disturbed land, the Conservation Easement primarily consists of open space and undeveloped land.

The Project site is surrounded by residential uses to the north, west, and south; the Meridian West Campus Lower Plateau development area, located within the March JPA planning area, to the east; and two new industrial buildings built by Exeter, located in Riverside County, to the east and north. The residential uses to the north are located within Riverside County. The residential uses to the northwest and west are part of the Mission Grove neighborhood in the City of Riverside. The residential uses to the south are part of the Orangecrest neighborhood in the City of Riverside. The closest schools to the Project site, Benjamin Franklin Elementary School and Amelia Earhart Middle School, are located south of the Project site in the Orangecrest neighborhood. The Benjamin Franklin Elementary School is located approximately 3,064 feet south of the Specific Plan Area and the Amelia Earhart Middle School is located approximately 3,315 feet south of the Project site. Additionally, Grove Community Church Preschool is located on the Grove Community Church campus, which is approximately one-quarter mile south of the Specific Plan Area.

The parcels immediately to the east of the Project site are designated as Business Park (BP) and Industrial (IND). The parcels immediately to the north, west, and south of the Project site are not part of the March JPA planning area. The nearest residential area is located approximately 300 feet north of the Specific Plan Area.

As shown on Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, the Project site is designated as Business Park (BP), Industrial and Park/Recreation/Open Space (P/R/OS). The March JPA General Plan includes warehousing in the definition of Business Park uses (March JPA 1999). The Project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown on Figure 3-3, March JPA Zoning Designations.

3.2 Project Background

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

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

The Project site has been analyzed under both CEQA and NEPA in the following documents:

- March Air Force Base Master Reuse Plan, March JPA (October 2, 1996)
- Final Environmental Impact Statement: Disposal of Portions of March Air Force Base (February 1996)
- Final Environmental Impact Report for the March Air Force Base Redevelopment Project (June 1996)
- Redevelopment Plan for the March Air Force Base Redevelopment Project (July 1996)
- March Joint Powers Authority Development Code (July 1997)
- General Plan of the March Joint Powers Authority (September 1999)
- Master Environmental Impact Report for the General Plan of the March Joint Powers Authority (September 1999)
- Final Air Installations Compatible Use Zone Study, March Air Reserve Base (2018)

As stated previously, the Project site is designated as Business Park (BP), Industrial (I) and Park/Recreation/Open Space (P/R/OS) under the existing General Plan Land Use Map (see Figure 3-2). Meridian Park LLC is now pursuing development of the site with Specific Plan, Parks/Recreation/Open Space and Public Facility General Plan land use designations. The application also includes amendments to the General Plan Transportation Element to identify the completion of Cactus Avenue, Barton Street and Brown Street within the Project.

On September 12, 2012, a Settlement Agreement was entered between and among the Center for Biological Diversity (CBD), the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC as the complete settlement of the claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et al*. (Appendix S). The CBD Settlement Agreement contemplated the division of western acreage under the jurisdiction of the March JPA,

including the Project site, into a conservation area, developable area, and a water quality/open space area (see Figure 3-4, CBD Settlement Agreement). The CBD Settlement Agreement covers more acreage than is included in the Project site.

The analysis in this EIR addresses the following two components of the proposed Project: the proposed buildout of the Specific Plan Area as allowed in the Specific Plan and the placement of the Conservation Easement under a conservation easement pursuant to, and consistent with, the CBD Settlement Agreement (Appendix S).

3.3 Project Objectives

The proposed Project requests a General Plan Amendment, Specific Plan, Zone Change, Tentative Parcel Map, two Plot Plans, an Amendment to the Disposition and Development Agreement, and a Development Agreement to redevelop the former munitions bunkers and adjacent land from the March AFB. The primary objectives of the Project include the following:

- Provide increased job opportunities for local residents through the provision of employment-generating businesses.
- Provide open space amenities to serve the region.
- Provide an active park consistent with the 2009 Safety Study prepared by March JPA.
- Complete the buildout of the roadway infrastructure by extending Cactus Avenue to the Specific Plan Area from its existing terminus, extending Barton Street from Alessandro Boulevard to Grove Community Drive, and extending Brown Street from Alessandro Boulevard to Cactus Avenue.
- Remove and redevelop a majority of the former munitions storage area of the March AFB.
- Encourage the use of alternative modes of transportation through the provision of a pedestrian and bicycle circulation system that is safe, convenient, and comfortable.
- Implement the terms and conditions agreed upon in the September 12, 2012, Settlement Agreement entered into between and among the CBD, the San Bernardino Valley Audubon Society, March JPA, and LNR Riverside LLC, as the complete settlement of the claims and actions raised in *Center for Biological Diversity v. Jim Bartel, et al*. to preserve open space through establishing a Conservation Easement.

3.4 Existing Conditions

Existing development within the Project site consists of a non-operational water tower, asphalt paved and dirt access roads, seven buildings in various states of abandonment, chain-link fencing, and 14~~6~~ bunkers that were previously used for munitions storage by the Air Force. All of the bunkers are currently used by Pyro Spectaculars Inc. for the storage of fireworks. The remainder of the Project site is generally unoccupied. While the Specific Plan Area primarily encompasses existing development and previously disturbed land, the Conservation Easement primarily consists of open space and undeveloped land. The CBD Settlement Agreement identified publicly accessible trails in areas of the Project site that would be within the Conservation Easement (Appendix S). This area has been utilized by the public for passive recreation for more than 10 years.

3.5 Proposed Project

The following terminology is used throughout this EIR to discuss the Project, Project impacts, and impacts of various components of the Project:

- **Specific Plan Area** = Consists of the Upper Plateau Campus Development, Park, and Infrastructure Improvements.
- **Campus Development** = Under the Specific Plan buildout scenario analyzed in this Draft EIR, the Upper Plateau Campus would be developed with ten Business Park parcels, six Mixed Use parcels, three Industrial parcels, two Public Facility parcels, and three open space parcels. These parcels would be created, designated, and graded. Buildings B and C would be constructed on two of the Industrial Parcels. The remaining parcels would be developed with square footages as allowed under the Specific Plan.
- **Park** = Proposed park component of the Project, consisting of 60.28-acre park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground; multi-use sports fields that could be used for soccer, football, and field hockey; and trails with cardio stops for recreational users.
- **Infrastructure Improvements** = installation of utility and roadway networks connecting to and throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5 million gallon reclaimed water tank.
- **Conservation Easement** = Approximately 445.43 acres of undisturbed land surrounding the Specific Plan Area, referred to as the Conservation Easement, would be placed under a conservation easement, consistent with prior determinations made as part of the CBD Settlement Agreement (Appendix S).

For analysis purposes in this EIR, the proposed Project consists of two components, pursuant to and consistent with the CBD Settlement Agreement (Appendix S): the Specific Plan Area and the Conservation Easement. Additionally, the existing EMWD water tank located north of the Specific Plan Area would be assigned a General Plan land use designation of Public Facility; no physical changes to this water tank would occur. As such, the specifics for each Project component are shown in Table 3-1 and discussed below.

Table 3-1. Project Components

Land Use	Acreage
Specific Plan Area	
Business Park	65.32
Industrial	143.31
Mixed Use	42.22
Public Facility	2.84
Parks, Recreation, and Open Space	78.00
Streets	37.91
Subtotal	*369.60*
Conservation Easement	
Open Space	445.43
Subtotal	*445.43*

Table 3-1. Project Components

Land Use	Acreage
Existing Eastern Municipal Water District Water Tank	
Public Facility	2.87
Subtotal	*2.87*
Total Project Site	817.90

Source: See Figure 3-5, Site Plan.

3.5.1 Specific Plan Area

Given the land uses planned for the Project area, as outlined in the Specific Plan, this Draft EIR assumes the following buildout of the Specific Plan Area for analysis throughout the EIR. These uses are consistent with the permitted uses shown in Table 3-2.

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facility – 2.84 acres for future sewer lift station and electrical substation (within the Specific Plan Area)

Based on the total acreage and land uses proposed, the Specific Plan Area is anticipated to result in approximately 2,600 employees at buildout[1] (see Draft EIR Section 4.12, Population and Housing, and Appendix O, Water Supply Assessment, for more details).

Table 3-2 lists the permitted, conditionally permitted, ancillary, and prohibited uses per each proposed land use designation of the Specific Plan.

Table 3-2. Land Uses by Land Use Designation

Uses	Business Park[1]	Industrial[2]	Mixed Use	P/R/OS	Public Facility
Industrial					
Bio-Medical Waste Treatment Facility	—	C	—	—	—
Manufacturing - Custom	P	P	C	—	—

[1] Employment buildout is based on estimates provided in the Water Supply Assessment (Appendix O), which states the Specific Plan Area's projected water demand is 382.47 acre-feet per year (AFY). The Specific Plan Area's estimated indoor water demand is 124.33 AFY. This calculation is based on an estimated 60 gallons per employee, per day, and multiplied by 260 working days annually for 2,595 employees. This Draft EIR rounds up to a conservative estimate of 2,600 employees for the Specific Plan Area.

Table 3-2. Land Uses by Land Use Designation

Uses	Business Park[1]	Industrial[2]	Mixed Use	P/R/OS	Public Facility
Manufacturing - Light	P	P	C	—	—
Manufacturing - Medium	P	P	—	—	—
Manufacturing - Heavy	—	—	—	—	—
Newspaper Publishing Plants	P	P	—	—	—
Research and Development	P	P	P	—	—
Trucking/Transportation Terminals	—	—	—	—	—
Storage/Distribution					
Public Storage/Mini-Warehouse (Indoor)	C	C	C	—	—
Business Enterprise	P	P	P	—	—
Warehouse - Medium	—	P	—	—	—
Warehouse - Heavy	—	P	—	—	—
High Cube Transload and Short-Term Storage Warehouse	—	P	—	—	—
High Cube Fulfillment Warehouse	—	P	—	—	—
High Cube Cold Storage Warehouse3	—	P	—	—	—
Parcel Delivery Terminal	—	—	—	—	—
Office					
Financial Institutions	P	—	P	—	—
Fire Stations	P	P	P	P	P
Government	P	P	P	—	—
Medical Clinics	P	P	P	—	—
Offices, Business and Professional	P	C	P	—	—
Police Stations and Sub-Stations	P	P	P	P	P
Regional and Corporate Headquarters	P	C	P	—	—
Commercial					
Agricultural Equipment Repair Shops	C	P	—	—	—
Agricultural/Nursery Supplies and Services	C	C	P	—	—
Alcoholic Beverage Outlets	C	C	C	—	—
Animal Care/Pet Hotels	P	P	C	—	—
Assembly and Entertainment	—	—	—	—	—
Automotive Parts and Accessory Sales	—	—	P	—	—
Automotive Fleet Storage	C	C	C	—	—
Automotive Service Stations	—	—	—	—	—
Automotive/Truck Repair - Major	C	P	—	—	—
Automotive/Truck Repair - Minor	P	P	C	—	—
Building and Site Maintenance Services	P	P	P	—	—
Building Contractor's Storage Yard	P	P	C	—	—
Building Material and Equipment Sales	P	—	P	—	—
Business Supply/Equip Sales/Rentals	C	C	C	—	—
Business Support Services	P	P	P	—	—
Food Catering	C	—	C	—	—
Child Care Facilities	—	—	—	—	—

Table 3-2. Land Uses by Land Use Designation

Uses	Business Park[1]	Industrial[2]	Mixed Use	P/R/OS	Public Facility
Churches and Places of Religious Assembly	—	—	—	—	—
Communication Facilities, Antennas and Satellite Dishes	C	C	C	—	—
Consumer goods, Furniture, Appliances, Equipment Sales	C	—	P	—	—
Convenience Sales	C	—	C	—	—
Energy Generation and Distribution Facilities	—	—	—	—	—
Exhibit Halls and Convention Facilities	—	—	—	—	—
Fairgrounds	—	—	—	—	—
Food And Beverage Sales	C	A	C	—	—
Funeral and Mortuary Services	—	—	—	—	—
General Retail Establishments	—	—	P	—	—
Golf Courses, Driving Ranges and Pitch and Putt Courses	—	—	—	—	—
Grocery Stores	—	—	—	—	—
Health Club – Under 5,000 s.f.	C	—	C	—	—
Health Club – Larger than 5,000 s.f.	—	—	—	—	—
Heavy Equipment Sales and Rentals with Outside Merchandising	C	C	C	—	—
Horticulture Nurseries and Greenhouses	C	P	—	—	—
Hospitals, Intermediate Care Facilities and Nursing Facilities	—	—	—	—	—
Hotel/Motel	—	—	—	—	—
Instructional Studios – Under 5,000 s.f.	C	—	C	—	—
Instructional Studios – Larger than 5,000 s.f.	—	—	—	—	—
Interpretive Center	C	--	C	—	—
Laundry Services	P	P	C	—	—
Maintenance and Repair	P	P	P	—	—
Major Transmission, Relay or Communications Switching Stations	P	P	C	—	—
Museums	—	—	—	—	—
Bar and Grill, Microbrewery – Under 5,000 s.f.	—	—	C	—	—
Open Air Markets for the Sale of Agriculture-related Products and Flowers	C	—	C	C	—
Outdoor Commercial	—	—	C	—	—
Outpatient Medical Clinic	—	—	P	—	—
Parking Facilities as a *Primary Use*	C	C	C	—	—
Personal Services	—	—	P	—	—
Petroleum Products Storage	A	A	—	—	—
Pets and Pet Supplies	—	—	C	—	—

Table 3-2. Land Uses by Land Use Designation

Uses	Business Park[1]	Industrial[2]	Mixed Use	P/R/OS	Public Facility
Private Clubs, Lodges and Fraternal Organizations	—	—	—	—	—
Radio and Television Studios	P	P	P	—	—
Recreational Facilities	—	—	—	—	—
Recycling Facilities (Outdoor Storage not to Exceed Building Area)	C	C	C	—	—
Repair Services	P	P	P	—	—
Restaurants (Fast Food)	C	—	C	—	—
Restaurant (Sit Down)	C	—	C	—	—
Social Service Institutions	P	P	P	—	—
Sundries, Pharmaceutical and Convenience Sales	—	—	P	—	—
Trade Schools	—	—	—	—	—
Vehicle, Boat and Trailer Sales	C	—	C	—	—
Vehicle Storage	C	C	C	—	—
Veterinary Clinics and Animal Hospitals	C	—	P	—	—
Other Uses					
Parks and Recreational Facilities (Public)	—	—	—	P	—
Public Utility Stations, Yards, Wells and Similar Facilities, Excluding Offices	—	—	—	P	P

Source: West Campus Upper Plateau Specific Plan, Table 3-1

Notes: P = Permitted; C = Conditional Use Permit; A = Ancillary; — = Prohibited.

Notwithstanding Table 3-1, all uses are subject to the density/intensity standards and additional criteria set forth in the most current version of the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, as may be amended from time to time. Certain uses listed in this table may be limited in density/intensity or prohibited as a result of the Compatibility Plan standards. Development within the West Campus Upper Plateau is subject to the March Air Reserve Base/Inland Port Airport Compatibility Zone Study, as updated from time to time.

~~All uses subject to the density/intensity standards and additional criteria set forth in the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan. Certain uses listed in this table may be limited in density/intensity or prohibited as a result of the Compatibility Plan standards. Development within the West Campus Upper Plateau is subject to the March ARB/IP Airport Compatibility Zone Study effect, as updated from time to time.~~

1 Within the Business Park zone, a conditional use permit is required for uses that provide outdoor storage in excess of 10% of the primary building gross square footage.

2 Within the Industrial zone, a conditional use permit is required for uses that provide outdoor storage. Outdoor storage areas shall not exceed 25% of the total building area.

3 Buildings intended for Cold Storage use shall have a m~~M~~aximum ~~cumulative Cold Storage building area shall not exceed a maximum~~ building area of 500,000 SF combined.

Business Park

A total of 65.32 acres would be designated as Business Park. The seven Business Park parcels to the north would total 34.51 acres, the Business Park parcel to the southeast would be 9.14 acres, and the two Business Park parcels to the south would collectively total 21.67 acres. See Figure 3-5, Site Plan. Access to the Business Park parcels to the north would be via Arclight Drive, access to the Business Park parcel located in the southeast portion of the Specific Plan Area would be via Linebacker Drive, and access to the two southern Business Park parcels would be via Bunker Hill Drive. For buildout scenario analysis throughout this EIR, a total of 1,280,403 SF of

Business Park use is assumed and analyzed in this EIR as 75% warehouse use and 25% office and non-warehouse uses. A list of permitted land uses under the Business Park land use designation is provided in Table 3-2.

Industrial

At the center of the proposed Project would be three Industrial parcels, collectively totaling 143.31 acres. The northwest Industrial parcel would be 56.27 acres, the Industrial parcel to the northeast would be 27.49 acres, and the Industrial parcel south of Cactus Avenue would be 59.55 acres, as shown in Figure 3-5. Access to all three Industrial parcels would be via Cactus Avenue with the larger loop road system surrounding the two larger Industrial parcels. A list of permitted land uses under the Industrial land use designation is provided in Table 3-2. For buildout scenario analysis throughout this EIR, a total of 3,062,561 SF of Industrial use is assumed, including 1,250,000 SF for Building B, 587,000 SF for Building C, 500,000 SF of high-cube cold storage warehouse use, and 725,561 SF of Industrial high-cube fulfillment center warehouse use as envisioned within the Specific Plan. Cold storage use within the Campus Development would be limited to a maximum of 500,000 SF of the total Industrial square footage; however, as a conservative measure, the analysis assumes that the cold storage use could be located in Building B, Building C, or the remaining Industrial parcel.

Mixed Use

The six Mixed Use parcels would collectively total 42.22 acres, with the parcels separately being 5.75 acres, 5.45 acres, 9.26 acres, 9.12 acres, 7.84 acres, and 4.80 acres. Five parcels would be located along the west side of the Specific Plan Area, just east of the Barton Street extension and west of Airman Drive. These Mixed Use parcels would not have access to, or be accessible from, Barton Street. The smallest parcel would be located along the southeast corner of the Specific Plan Area where Bunker Hill Drive intersects with Linebacker Drive, as shown in Figure 3-5. For buildout scenario analysis throughout this EIR, a total of 643,686 SF of Mixed Use is assumed: 25% as retail and non-warehouse uses totaling 160,921 SF, 75% as business park uses totaling 482,765 SF. A list of permitted land uses under the Mixed Use land use designation is provided in Table 3-2.

Public Facility

Two Public Facility parcels, collectively totaling 2.84 acres, would consist of a 1.74-acre WMWD sewer lift station to be developed along the southeast side of the Specific Plan Area just south of Cactus Avenue and a 1.10-acre utility facility (electrical substation) to be developed southwest of the WMWD facility. Additionally, a 2.87-acre parcel that is occupied by an EMWD water tank would be designated as Public Facility in order to make the land use designation consistent with the development on the site, but no physical changes or additional development is proposed. A list of permitted land uses under the Public Facility land use designation is provided in Table 3-2.

Sewer Lift Station

To account for additional wastewater generated by the Project, there is the potential that a new Sewer Lift Station could be required. As such, to address the potential future need for the lift station, the EIR evaluates the construction and operation of a new Sewer Lift Station that would be operated by WMWD on a 1.74-acre site in the eastern portion of the Specific Plan Area. The Sewer Lift Station would be immediately east of the 9.14-acre Business Park parcel, south of Building C and Cactus Avenue. Access to the lift station site would be provided via Cactus Avenue. During site grading, wastewater utility lines will be installed to provide connection to the lift station.

Electrical Substation

A new aboveground electrical substation, which would be operated by Southern California Edison, would be constructed on a 1.10-acre parcel in the eastern portion of the Specific Plan Area, east of the southeast corner of the Building B site. Access to the substation would be via a driveway off of Linebacker Drive. Four inches of gravel would be placed above the graded site and up to 10 electrical transformers would be installed on the site. The substation would be surrounded by a block wall to visually shield and restrict public access to the electrical systems and transformers within the substation. The height of the concrete block wall surrounding the substation would be 6 feet. Construction of the substation would occur concurrent with the development of the remainder of the Project site.

Parks, Recreation, and Open Space

The 78 acres of park/recreation/open space would consist of one 60.28-acre parcel west of Barton Street and three smaller parcels buffering the northern and southern portions of the Specific Plan Area, as shown in Figure 3-5. The 60.28-acre parcel would be developed as an Active Park, including a playground, multi-use sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. Access to the park would be via Barton Street. An approximately 11.98-acre parcel would provide a buffer between the seven Business Park parcels to the north and the surrounding Conservation Easement. A 2.40-acre parcel would be located south of Bunker Hill Drive, between the most southwesterly Mixed Use parcel and the two southern Business Park parcels. A 2.38-acre parcel would provide additional buffer along the southern perimeter of the proposed Specific Plan Area from Barton Street to Cactus Avenue. The open space parcels would provide a further buffer for the Conservation Easement and surrounding areas. For buildout scenario analysis throughout this EIR, the 78 acres of park/recreation/open space is analyzed as 42.2 acres of Active Park use (with sports fields) and 35.8 acres of park/open space use, including trails with cardio stops. As a Condition of Approval for this Project, an updated Parks Needs Assessment Report will be prepared to finalize the design and amenities included within the 60.28-acre park. For purposes of the analysis within this EIR, the most intensive park uses are assumed in order to provide a conservative estimate of potential environmental impacts associated with construction and operation of the park.

Circulation and Infrastructure

Roadways and Circulation

Buildout of the Specific Plan Area would also include the extension of Cactus Avenue from its existing western terminus to provide access to the proposed Industrial parcels and the internal roadway system, consisting of Airman Drive on the west, Arclight Drive on the north, Linebacker Drive on the east, and Bunker Hill Drive on the south, as shown in Figure 3-5. Barton Street would also be extended from Alessandro Boulevard to the north to connect to Grove Community Drive to the south, consistent with the Circulation Element of the City of Riverside's General Plan. An emergency vehicle access driveway, with a Knox box-controlled access gate that can only be locked and unlocked by emergency service providers, would be provided at the western terminus of Cactus Avenue to provide an emergency connection to Barton Street. This emergency vehicle access driveway would also serve as a pedestrian and bicyclist connection from Barton Street to Cactus Avenue to provide a linkage to the Specific Plan Area and the Metrolink station to the east of the Project site.

The Specific Plan Area would be accessed through the extension of existing streets that have been planned in the March JPA General Plan. Access to the Specific Plan Area would be provided from the east via Cactus Avenue, which would be extended to the west from its current western terminus through the Specific Plan Area. The new park would be accessed from the north and south by extending Barton Street to connect from Alessandro Boulevard in

the north to Grove Community Drive in the south. Secondary access to the Specific Plan Area would be via Brown Street, which would be extended south to connect from Alessandro Boulevard to the new extension of Cactus Avenue. Truck routes are proposed along Cactus Avenue to I-215, as well as along Linebacker Drive, Arclight Drive, Airman Drive, and Bunker Hill Drive (see Figure 3-6, Proposed Truck Routes), all of which would connect to existing truck routes along Alessandro Boulevard, Meridian Parkway, and Cactus Avenue (east of Meridian Parkway). As shown in Figure 3-6, trucks from the Specific Plan Area would be prohibited along the Barton Street extension. Trucks would also be prohibited from turning left on Brown Street to access Alessandro Boulevard.

Utilities

On-site trenching would occur to connect with existing water, recycled water, wastewater, natural gas, and electrical facilities that are currently stubbed out at the western terminus of Cactus Avenue, and a primary water connection extension from the intersection of Barton Street and Grove Community Drive. The proposed development would extend these utilities along Cactus Avenue to the Specific Plan Area (Figures 3-7A(1) through 3-7H, Utility Extensions). Electrical facilities, fiber optic, and CATV would also provide looped connections to both ends of the Barton Road extension. In addition, buildout of the Specific Plan Area would require the relocation of several existing on-site utilities, including a 30-inch gas line, owned and operated by the Southern California Gas Company (SoCal Gas), that traverses the Project site. As part of grading activities for the Specific Plan Area, the alignment of the gas line would be adjusted to be consistent with the grading activities completed at the Project site. SoCal Gas will be responsible for carrying out the pipeline improvements; however, this EIR will provide the environmental review and clearance for SoCal Gas to proceed with the adjustment of the grade of the gas line to the proposed finished grading surface.

Additionally, the existing recycled/reclaimed water line, which is located along Meridian Parkway and Cactus Avenue, would be extended to the west along Cactus Avenue to provide recycled water to the Specific Plan Area and connected to a new reclaimed water tank, located off site and adjacent to an existing WMWD domestic water tank in the Orange Terrace community south of the Specific Plan Area. The tank site is located south of the Project site and accessed from Grove Community Drive. The new tank would consist of an aboveground 0.5 million gallon prefabricated, bolted steel tank on a poured concrete slab next to an existing water tank on an already disturbed and graded site. As shown in Figure 3-7C, the new tank would be connected to ~~an existing~~ a new reclaimed water line ~~running~~ to be installed along Grove Community Drive, ~~and a new line would also be installed along the southern boundary of the Project Site,~~ traveling west to connect to Barton Street, and traveling north to connect with the Specific Plan Area. Construction would occur beginning in 2023 and would involve remedial grading, pouring a concrete pad, assembling the tank, trenching and utility line installation, and connections to provide the reclaimed water to the Project site. Water service (domestic and fire) and sewer service would also be provided by WMWD and utility lines to provide service throughout the site would be installed during the grading activities at the Specific Plan Area.

Landscaping

Buildout of the proposed Specific Plan Area would include perimeter landscaping consisting of a minimum 30-foot-wide landscape buffer along the northern, western, and southern Specific Plan Area boundaries maintained by a Landscape Lighting and Maintenance District. As such, implementation of landscape design guidelines would not be within the proposed Conservation Easement. In addition, perimeter slopes and street parkways would be maintained by the Landscape Lighting and Maintenance District. All landscape planting would be drought tolerant and irrigated by recycled water. Streetscape landscaping is proposed for all streets within the Specific Plan Area, presenting a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers. The plant palette for the proposed Project would include colorful shrubs and groundcovers, ornamental grasses and succulents, and evergreen and deciduous trees that are commonly used throughout Southern California and the

Inland Empire region. A list of plant materials approved for use in the Specific Plan is provided for in Appendix B, Landscape Plant Palette, of the Specific Plan. Additionally, the Landscape Plant Palette would comply with the Multiple Species Habitat Plan and will not include any listed invasive species.

3.5.2 Project Design Features

The following Project Design Features (PDFs) have been incorporated into the Project and analysis throughout this EIR. Although the PDFs are already part of the Project, they will also be included as separate conditions of approval and included in the Mitigation Monitoring and Reporting Program (MMRP). March JPA will monitor compliance through the MMRP.

Aesthetics

PDF-AES-1 Development shall comply with the Specific Plan Design Standards which dictate building heights, setbacks, color palettes ~~pallets~~ and materials intended to minimize visual obstructions and maximize visual compatibility.

PDF-AES-2 All exterior lighting shall minimize glare and "spill over" light onto public streets, adjacent properties, and Conservation Easement by using downward- directed lights and/or cutoff ~~devises~~ devices on outdoor lighting fixtures, including spotlights, floodlights, electrical reflectors, and other means of illumination for signs, structures, parking, loading, unloading, and similar areas. Where desired, illuminate trees and other landscape features by concealed uplight fixtures (on- and off-site).

PDF-AES-3 Limit light spillover or trespass to one-half foot-candle or less, measured at the property line for development adjacent to the Conservation Easement (off-site). This shall be confirmed through point-by-point photometric study.

PDF-AES-4 Limit light spillover or trespass to one-half foot-candle or less, measured from within five feet of any adjacent property line for development adjacent to nonresidential uses (on-site). This shall be confirmed through point-by-point photometric study.

PDF-AES-5 Lighting fixtures shall have a similar design, materials, fixture color, and light color. Use of LED lighting shall be required for parking lot lighting; parking lot lighting shall be within 100 Kelvin of 2700 Kelvin; other lighting techniques for accent lighting shall be allowed (on- and off-site).

PDF-AES-6 Lights shall be unbreakable plastic, recessed, or otherwise designed to reduce the problems associated with damage and replacement of fixtures (on- and off-site).

PDF-AES-7 Neon and similar types of lighting are prohibited in all areas with the Specific Plan Area (on-site).

PDF-AES-8 Locate all electrical meter pedestals and light switch/control equipment in areas with minimum public visibility or screen them with appropriate plan materials (on- and off-site).

PDF-AES-9 Illuminate parking lots, loading dock areas, pedestrian walkways, building entrances, and public sidewalks to the level necessary for building operation and security reasons. Dimmers and motion detectors are permitted (on-site).

PDF-AES-10 Along sidewalks and walkways, the use of low mounted fixtures (ground or bollard height), which reinforce the pedestrian-scaled, are encouraged (on-site).

PDF-AES-11 Use exterior lights to accent entrances, plazas, activity areas, and special features (on-site).

PDF-AES-12 High-Pressure (HPS) light fixtures are prohibited for site lighting (on-site).

PDF-AES-13 Lighting is prohibited that could be mistaken for airport lighting or that would create glare in the eyes of pilots of aircraft using the nearby March Air Reserve Base (on-site).

PDF-AES-14 All exterior on-site light fixtures shall be fully shielded with no light emitted above the horizon (on-site).

PDF-AES-15 Maximum on-site lighting wattage is 750 (on- and off-site).

PDF-AES-16 Maximum height of on-site exterior lighting for buildings is 25 feet; sports fields lighting may have a maximum height of 50 feet and shall be located no closer than 450 feet from residences (on-site).

Air Quality

~~PDF-AQ-1 Offroad equipment used during construction shall meet CARB Tier 4 Final emission standards or better.~~

~~PDF-AQ-2 Construction Budget. To ensure construction activities occur within the assumptions utilized in the Air Quality Impact Analysis (AQIA) (Appendix C-1) and disclosed in the EIR, the following shall be implemented:~~

- ~~During each Phase of Project construction, the operating hours of construction equipment on site shall not exceed the assumptions set forth in Table 5-2 of the AQIA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation. The construction contractor shall submit a construction equipment hours log to the March JPA every 2 weeks to ensure compliance.~~
- ~~During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance. "Active disturbance" does not include moving of equipment from staging area(s) to grading areas.~~

~~PDF-AQ-3 Future Site Plans. All Specific Plan Area site plans shall include documentation confirming the site plan's environmental impacts do not exceed the impacts identified and disclosed in this EIR. Absent such documentation, additional environmental review shall be required.~~

PDF-AQ-14 No Natural Gas Use. Specific Plan Area development shall not utilize natural gas. In the event a future structure requires access to any available natural gas infrastructure, additional environmental review shall be required.

Cultural Resources

PDF-CUL-1 Two Weapons Storage Area igloos will be retained on the Project site. These igloos will remain visually accessible to the public and signage will be incorporated to share the historical nature and use of these facilities as part of the former March Air Force Base.

Greenhouse Gas Emissions

PDF-GHG-1 Conduit shall be installed in truck courts in logical locations that would allow for the future installation of charging stations for electric trucks, in anticipation of this technology becoming available.

Hazards and Hazardous Materials

PDF-HAZ-1 As required by the Riverside County Airport Land Use Compatibility Plan (ALUCP), as detailed plans become available, they will be reviewed for consistency with the Riverside County ALUCP. In addition, the following conditions as a result of ALUC Development Review (File No. ZAP1515MA22, Appendix L) shall apply:

- Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
- A "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property, and be recorded as a deed notice. A copy of this notice is attached to the conditions for ALUC Development Review (File No. ZAP1515MA22).
- The Project has been conditioned to utilized underground detention systems, which shall not contain surface water or attract wildlife. Any proposed stormwater basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm and remain totally dry between rainfalls. Vegetation in and around the basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in Project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.

  Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.

  A notice sign shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.
- Temporary construction equipment used during actual construction of the structure(s) shall not exceed the prescribed heights as identified in the aeronautical studies, unless separate notice is provided to the Federal Aviation Administration through the Form 7460-1 process.

PDF-HAZ-2 Stormwater management facilities will be designed such that any modifications to open channels or native flow lines do not support potentially hazardous wildlife through the incorporation of vegetation that could provide food, shelter, or nesting habitat for wildlife. Stormwater management facilities will also be consistent with Riverside County ALUCP Condition 4 related to stormwater management facilities and detention basins (see also PDF-HAZ-1).

PDF-HAZ-3 Solid waste that is stored on site for recycling and disposal will be contained in covered receptacles that remain closed at all times.

PDF-HAZ-4 Grading plan standards related to potential ditches, terrace drains, or other minor swales will require that seed mixes used for soil stabilizations are reviewed by a QAWB and revised as necessary to exclude the use of grains or other constituents that may attract potentially hazardous wildlife.

Noise

PDF-NOI-1 **Hours of Construction.** Project construction activities shall not be conducted during the period from 10:00 p.m. on a given day until 6:00 a.m. on the following day. Additionally, outdoor construction and grading activities, including the operation of any tools or equipment associated with construction, drilling, repair, alteration, grading/grubbing or demolition work within 500 feet of the property line of a residential use, shall be prohibited between the hours of 7:00 p.m. and 7:00 a.m. Monday through Friday, between 5:00 p.m. and 8:00 a.m. on Saturdays, and at any time on Sunday or a Federal Holiday.

PDF-NOI-2 **Blasting and Drilling Limits**. No blasting shall occur within 1,000 feet of any residence or other sensitive receptor. In the event bedrock material that is not rippable by bull-dozer is encountered within 1,000 feet of any residence or other sensitive receptor, the construction contractor shall utilize expansive epoxy or other non-explosive demolition agent for any necessary removal operations. In addition to the distance limits, any blasting or drilling activities shall not exceed the City construction noise threshold of 75 dBA Leq for City residents or the County's construction noise threshold of 65 dBA Lmax for County residents.

PDF-NOI-3 **Blasting Activities.** All blasting activities shall be designed to meet the regulatory construction noise and vibration thresholds outlined on Table 4.11-7 of this EIR.

Transportation and Traffic

PDF-TRA-1 As part of the Project, the following on-site and site-adjacent roadway improvements will be constructed to accommodate site access.

Airman Drive and Cactus Avenue:

- Install a traffic signal.
- Construct a northbound shared through and -right turn lane (225 feet of storage).
- Construct dual southbound left turn lanes (225-feet of storage) and a through lane.
- Construct a westbound left turn lane (300-feet of storage) and a right turn lane.

Linebacker Drive and Cactus Avenue:

- Install a traffic signal.
- Construct the northbound approach with a left turn lane (200-feet of storage), through lane, and right turn lane (250-feet) with overlap phasing.
- Construct the southbound approach with dual left turn lanes (325-feet of storage) and shared through-right turn lane.
- Construct eastbound approach with one left turn lane (200-feet of storage), one through lane, and one shared through-right turn lane.
- Construct westbound approach with one left turn lane (300-feet of storage), one through lane, and one right turn lane (trap lane, no pocket length).

Brown Street and Cactus Avenue:

- Install a traffic signal.
- Construct the southbound approach with a shared left-right turn lane.
- Construct the eastbound approach with a left turn lane (two-way-left-turn lane) and two through lanes.
- Construct the westbound approach with a through lane and shared through-right turn lane.

Cactus Avenue:

- Construct Cactus Avenue at its ultimate full-section width as a Modified Secondary Highway (98-foot right-of-way, 76-foot curb-to-curb) between Linebacker Drive and the existing terminus west of Meridian Parkway. The right-of-way will accommodate 6-foot sidewalks and 4.5-feet of parkway on both sides along with a 5-foot bike lane, landscaped median and two traveled lanes in each direction. The West Campus Upper Plateau roadway cross-sections are shown on Exhibit 1-5 of the TA.
- Construct Cactus Avenue at its ultimate full-section width as a Modified Industrial Collector (76-foot right-of-way, 54-foot curb-to-curb) west of Linebacker Drive to Airman Drive. The right-of-way will accommodate 5-foot detached sidewalks on both sides along with a 5-foot bike lane and a single traveled lane in each direction (of 16-feet) separated by a 12-foot striped median.
- Construct a gated emergency access only connection between the terminus of Cactus Avenue at Airman Drive and Barton Street.

Barton Street:

- Construct Barton Street at its ultimate full-section width as a Collector (66-foot right-of-way, 40-foot curb-to-curb) from the existing northerly and southerly termini consistent with the City of Riverside's Circulation Element. Once completed, the roadway will provide a connection between the existing Mission Grove community to the north and Orangecrest community to the south. The right-of-way will accommodate 6-foot sidewalks on the east side with 10-foot multipurpose trail and 5-feet of landscape on the other side along with a 5-foot bike lane and a single traveled lane in each direction (of 14.5-feet). The

multipurpose trail will only be accommodated for portions of Barton Street adjacent to the open space/parks. Sidewalk improvements will extend to the intersection of Grove Community Drive and Barton Street and bike racks and bike lockers will be provided near the entrance of the Park.

Brown Street:

- Construct Brown Street at its ultimate full-section width as an Industrial Collector (78-foot right-of-way, 56-foot curb-to-curb) between the existing northerly terminus and Cactus Avenue. The right-of-way will accommodate 6-foot sidewalks on both sides along with a 5-foot bike lane and a single traveled lane in each direction (of 17-feet) separated by a 12foot striped median.

Internal Streets (Linebacker Drive, Airman Drive, Bunker Hill Drive, and Arclight Drive):

- Construct these roadways at their ultimate full-section width as an Industrial Collector (76-foot right-of-way, 54-foot curb-to-curb). The right-of-way will accommodate 6-foot sidewalks on both sides along with a 5-foot bike lane and a single traveled lane in each direction (of 16-feet) separated by a 12-foot striped median.

PDF-TRA-2 The Project will amend the existing March JPA truck routes along Brown Street to Cactus Avenue, and Cactus Avenue west from Meridian Parkway. Internal Project roadways of Linebacker Drive, Arclight Drive, Bunker Hill Drive, and Airman Drive will also be truck routes. No truck access is permitted along Barton Street.

PDF-TRA-3 **Truck Route Enforcement Program.** To address trucks turning left from Cactus Avenue onto Brown Street or otherwise violating the established truck routes, the Project applicant shall provide the March Joint Powers Authority compensation of $100,000 to fund a truck route enforcement for a period of two years.

PDF-TRA-4 **Payment of Fair Share Cost**. To address operational deficiencies at off-site intersections, the Project shall contribute approximately $321,799 as its fair share towards the improvement measures provided in the Table 1-4, Summary of Improvements and Rough Order of Magnitude Costs, of the TA (Appendix N).

Wildfire

PDF-FIRE-1 The Project shall comply with Chapter 33 of the California Fire Code, which prescribes minimum safeguards for construction, alteration and demolition operations to provide reasonable safety to life and property from fire during construction operations within a fire hazard severity zone.

PDF-FIRE-2 The Project's Fire Protection Plan (FPP) evaluates and identifies the potential fire risk associated with the Project's land uses. The Project shall implement the FPP's recommendations for water supply, fuel modification and defensible space, access, building ignition and fire resistance, and fire protection systems, among other pertinent fire protection criteria, which complies with or exceeds existing code requirements for building in a fire hazard severity zone. The Project shall also comply with the fire safety requirements and standards of the Riverside County Fire Department along with Project-specific measures based on the Project site, its intended use, and its fire environment, as defined and memorialized in the FPP.

As described in the Project's FPP and graphically represented in Figure 6 of Appendix Q, the Fuel Modification Zones would be as follows:

Zone A: Non-Combustible Zone

Zone A extends 5-feet from buildings and structures.

The ember-resistant zone is currently not required by law, but science has proven it to be the most important of all the defensible space zones. This zone includes the area under and around all attached decks and requires the most stringent wildfire fuel reduction. The ember-resistant zone is designed to keep fire or embers from igniting materials that can spread the fire to Project buildings. The following provides guidance for this zone, which may change based on the regulations developed by the Board of Forestry and Fire Protection.

- Use hardscape like gravel, pavers, concrete and other noncombustible mulch materials. No combustible bark or mulch.
- Remove all dead and dying weeds, grass, plants, shrubs, trees, branches and vegetative debris (leaves, needles, cones, bark, etc.); Check roofs, gutters, stairways, etc.
- Limit plants in this area to low growing, nonwoody, properly watered and maintained plants.
- Relocate firewood and lumber to Zone B.
- Replace combustible fencing, gates, and arbors attach to structures with noncombustible alternatives.
- Consider relocating garbage and recycling containers outside this zone.
- Consider relocating boats, RVs, vehicles and other combustible items outside this zone.

Zone B: Paved/Irrigated Zone

Zone B extends up to 100 feet from buildings and structures.

- Remove all dead plants, grass and weeds (vegetation).
- Remove dead or dry leaves and pine needles from landscaping, roof and rain gutters.
- Remove branches that hang over roofs. rooves
- Trim trees regularly to keep branches a minimum of 10 feet from other trees.
- Relocate wood piles to Zone B.
- Remove or prune flammable plants and shrubs near windows.
- Remove vegetation and items that could catch fire from around and under decks, balconies, and stairs.
- Create a separation between trees, shrubs and items that could catch fire, such as wood piles.

Zone C: Thinning Zone

Zone C extends from Zone B up to 100 feet from buildings and structures

- Cut or mow annual grass down to a maximum height of 4 inches.
- Create horizontal space between shrubs and trees.

- Create vertical space between grass, shrubs and trees.
- Remove fallen leaves, needles, twigs, bark, cones, and small branches. However, they may be permitted to a depth of 3 inches.
- All exposed wood piles must have a minimum of 10 feet of clearance, down to bare mineral soil, in all directions.

Fire Access Road Zone

Extends a minimum of 10 feet from the edge of any public or private roadway that may be used as access for fire-fighting apparatus or resources adjacent to open space. Clear and remove flammable growth for a minimum of 10 feet on each side of the access roads. Additional clearance beyond 10 feet may be required upon inspection.

- Required clearance extends a minimum of 10 feet from the edge of any public or private roadway as well as an unobstructed vertical clearance of 20-feet.
- Landscaping and native plants shall be appropriately spaced and maintained.
- Trees found in Appendix E can be planted, if they are far enough from structures and Fire Department accesses, and do not overhang any structures or access at maturity.

Roadside fuel modification for the Project consists of maintaining ornamental landscapes, including trees, clear of dead and dying plant materials. Roadside fuel modification shall be maintained by the Project.

Undesirable Plants

Certain plants are considered to be undesirable in the landscape due to characteristics that make them highly flammable. These characteristics can be physical (structure promotes ignition or combustible) or chemical (volatile chemicals increase flammability or combustion characteristics). The plants included in the FMZ Undesirable Plan List (refer to Appendix E) are unacceptable from a fire safety standpoint and shall not be planted or allowed to establish opportunistically within the FMZs or landscape areas.

PDF-FIRE-3 March JPA's Landscape, Lighting and Maintenance District shall provide tenants of the West Campus Upper Plateau Specific Plan Area with a proactive educational component disclosing the potential wildfire risk and the FPP's requirements. These educational materials shall include information on maintaining the landscape and structural components according to the appropriate standards and embracing a "Ready, Set, Go" stance on evacuation. All educational materials shall be reviewed and approved by the Riverside County Fire Department**.** The FPP was prepared for the Project in accordance with CFC Title 24, Chapter 49.

3.5.3 Project Construction

~~As assumed in~~ For purposes of the technical analyses throughout this EIR, construction was assumed ~~is estimated~~ to begin in June 2023 and last ~~for approximately 4.5 years~~ through October 2027. For construction assumptions throughout the EIR, a 4.5-year construction period and a 2028 opening year is assumed ~~and that the Project site would be fully occupied and operational in the Fall of 2027~~. Construction staging would be entirely within the

construction limits shown in Figure 3-11, Construction Limits. The construction schedule utilized in the analysis, shown in Table 3-3, represents a "worst-case" analysis scenario; ~~should~~ as construction would occur ~~any time~~ after the respective dates, ~~given that~~ emission factors for construction would decrease as time passes and the analysis year increases due to emission regulations becoming more stringent. The duration of construction activity, as shown in Table 3-3, and associated equipment, as shown in Table 3-4, represent a reasonable approximation of the expected construction fleet as required under CEQA. The duration of construction activity is based on an opening year of ~~2027~~2028.

Table 3-3. Construction Schedule

Phase	Construction Activity	Start Date	End Date	Working Days
Phase 1	Mass Grading/Blasting and Rock Hauling	06/01/2023	03/05/2024	~~193~~ 199
Phase 2	Remedial Grading	03/06/2024	06/06/2024	~~65~~ 67
	Building Construction (including Off-Sites)	06/07/2024	10/15/2026	~~600~~ 615
	Architectural Coating	08/01/2026	10/05/2027	~~300~~ 307
	Paving	08/09/2027	10/05/2027	~~40~~ 42

Table 3-4. Construction Equipment Assumptions

Phase	Construction Activity	Equipment	Amount	Hours/ Day	Horsepower
Phase 1	Mass Grading	D10 Rip Cats	4	8	670
		D10 Push Cats	4	8	670
		651 Scrapers	16	8	570
		824 Dozer	1	8	425
		631 Water Pulls	3	8	500
		Farm Tractor	1	8	425
		Excavator with Breakers	4	8	400
	Blasting and Rock Hauling	D10 Rip Cats	2	8	670
		980 Loaders	2	8	400
		Rock Trucks	3	8	425
		D9 Cat W/Rock Rake	1	8	600
		Rock Drills	3	8	360
Phase 2	Remedial Grading	D10 Push Cats	2	8	670
		651 Scrapers	8	8	570
		824 Dozer	1	8	425
		631 Water Pulls	3	8	500
		Farm Tractor	1	8	425
		Excavator with Breakers	2	8	400
	Building Construction	Cranes	2	8	231
		Crawler Tractors	3	8	212
		Forklifts	6	8	89
		Generator Sets	2	8	84
		Welders	2	8	46
	Architectural Coating	Air Compressors	2	8	78
	Paving	Pavers	4	8	130

Table 3-4. Construction Equipment Assumptions

Phase	Construction Activity	Equipment	Amount	Hours/ Day	Horsepower
		Paving Equipment	4	8	132
		Rollers	4	8	80

3.5.4 Conservation Easement

Under the CBD Settlement Agreement (Appendix S), March JPA and Master Developer are required to place approximately 649 acres into conservation via easement to be managed for its wildlife habitat value for sensitive species. In 2014, March JPA placed the southern 141.237 acres (located north of Van Buren Boulevard) under a conservation easement currently managed by the Rivers and Lands Conservancy. Under this Project, approximately 445.43 acres of undisturbed land surrounding the Specific Plan Area, referred to as the Conservation Easement, would be placed under a conservation easement, consistent with prior determinations made as part of the CBD Settlement Agreement (Appendix S).[2] The Management Entity for the Conservation Easement would meet the following criteria outlined in the CBD Settlement Agreement:

- The Management Entity has qualifications and experience to work with listed species including appropriate permits for employees and subcontractors under federal and state Endangered Species Acts;
- The Management Entity has a demonstrated background in active wildlife management; and
- The Management Entity has the necessary organizational and fiscal capacity to manage the area in perpetuity.

The Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. In addition, the Conservation Easement would include two bunkers that would be retained for potential ongoing historical preservation. As previously noted, to further protect the Conservation Easement and the surrounding communities, the Project proposes three open space areas, including an additional 30-foot-wide landscaped buffer on the proposed parcels to the north, west, south, and southeast of the Specific Plan Area. The currently existing service roads and trails are utilized by the public for passive recreation within the Conservation Easement consistent with the terms outlined in the CBD Settlement Agreement (Appendix S). Under the proposed Project, access to these would remain.

3.5.5 California Environmental Quality Act

The baseline for a Project is typically the physical environmental condition that exists in the vicinity of a project when the NOP is published (14 CCR 15125(a)). The NOP for the Project was published on November 19, 2021, which will thus be the environmental baseline for the Project. Currently, existing development within the site consists of a non-operational water tower, dirt, and paved access roads, an existing EMWD water tank and 1~~4~~6 bunkers that were previously used for munitions storage by the Air Force. While the Specific Plan Area

[2] For informational purposes, in order to provide the minimum 649 acres of conservation area, the Applicant and March JPA identified an additional 87.7 acres of open space available for the dedication of a Conservation Easement located between the Project site's southern boundary and Van Buren Boulevard that was not included in the 2014 open space dedication. This is occurring as a separate action and not part of this Project.

contains existing development, the Conservation Easement consists of vacant and undeveloped land, as shown in Figure 3-5.

This EIR was prepared by the March JPA, as the Lead Agency, to inform decision makers and the public of the potential significant environmental effects associated with the Project. This EIR has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code, Section 21000 et seq.) and the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines; 14 CCR 15000 et seq.) published by the Public Resources Agency of the State of California.

The purpose of this EIR is to focus the discussion on those potential effects on the environment of the Project that the Lead Agency has determined may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce significant environmental impacts or avoid significant environmental impacts.

Full buildout of the Specific Plan Area, as discussed throughout this section of the EIR, is assumed in the analysis herein. As such, this EIR evaluates implementation of the Specific Plan at a project level while development specifics for certain parcels and specifically Building B and Building C are more certain at this time. The remainder of the proposed Project is evaluated with an assumed buildout scenario to represent a conservative maximum buildout to fully characterize environmental impacts associated with Specific Plan implementation.

3.5.6 Requested Approvals and Entitlements

To facilitate Project approval, the following would be required; details for each component are provided below.

General Plan Amendment 21-01

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

- Increase Parks, Recreation, and Open Space (P/R/OS) from approximately 122 gross acres to 523.43 gross acres.[3]
- Eliminate approximately 622.5 gross acres of Business Park designated property.
- Eliminate approximately 63 gross acres of Industrial designated property.
- Adopt the Meridian West Upper Plateau Specific Plan (SP-9) on approximately 369.60 gross acres, approving a mix of Business Park, Industrial, Mixed Use, Public Facility, Streets, and Open Space land uses.
- Amend the General Plan from Business Park to Public Facility on 2.87 acres to accommodate an existing water storage tank operated by EMWD.

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

- Extend Cactus Avenue west to Airman Drive, with a gated emergency vehicle access roadway extending to Barton Street.
- Extend Barton Street from Alessandro Boulevard to Grove Community Drive.

[3] A total of 8.62 acres within the 453.7 gross acres consists of streets located within the Conservation Easement.

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

Specific Plan 21-01 (SP-9)

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

The proposed land uses within Specific Plan SP-9 include the following:[4]

- 42.22 acres of Mixed Use
- 65.32 acres of Business Park
- 143.31 acres of Industrial
- 37.91 acres of streets and roadways[5]
- 78 acres of undeveloped Parks/Recreation/Open Space
- 2.84 acres of Public Facility

Total gross acreage = 369.60

Zoning Designation

The Project site, including both the Specific Plan Area and Conservation Easement, has not previously been given a zoning designation; therefore, the Project proposes zoning consistent with the requested Specific Plan designations of Mixed Use (MU), Business Park (BP), Industrial (IND), Parks/Recreation/Open Space (P/R/OS), and Public Facility (PF) for the Specific Plan Area, Parks/Recreation/Open Space (P/R/OS) for the Conservation Easement, and Public Facility for the existing EMWD water tank.

Tentative Parcel Map 38063

Concurrent with the General Plan and Zoning Amendments, the Specific Plan, and the Plot Plans, approval of a Tentative Parcel Map is required for the Specific Plan boundaries. Following the approval of Tentative Parcel Map, a Final Map would become the legal document that identifies developable parcels within the Specific Plan area. See Figure 3-8, Tentative Parcel Map, for more details.

Plot Plans 21-03 and 21-04

Concurrent with the General Plan and Zoning Amendments, the Specific Plan, and the Tentative Parcel Map, plot plan approvals are required to construct an approximately 1,250,000-square-foot industrial building on 59.55 acres at 20133 Cactus Avenue and a 587,000-square-foot industrial building on 27.49 acres at 20600 Cactus Avenue.

4 A total of 8.62 acres within the 453.7 gross acres consists of streets located within the Conservation Easement.
5 Included in this area are 8.62 acres of streets and roadways that are within the Conservation Easement.
~~4. Minor changes to the SP/Zoning, involving approximately one acre, have been incorporated since the time of the NOP.~~

Plot Plans for each of these proposed buildings are included as Figure 3-9, Plot Plan – Building B, and Figure 3-10, Plot Plan – Building C.

Development Agreement 21-01

~~Due to the scale and complexity of the proposed Project, a~~A Development Agreement is proposed to vest the Project entitlements and fees, ensure financing of public improvements required by the conditions of approval, and provide certain Community Benefits including compliance with the terms of the CBD Settlement Agreement (Appendix S), and provision of new public benefits, including, but not limited to, expansion of employment opportunities for area residents. The Community Benefits include the following:

- Park: Grading of a minimum of 60 acres of the Park site, funding and preparation of a Park Feasibility Study, and construction of Park improvements up to $3,500,000.
- Fire Station: Construction of the Meridian Fire Station at the northeast corner of Meridian Parkway and Opportunity Way as evaluated in the 2010 Final Subsequent EIR for the Meridian Specific Plan Amendment (SP-5) (March JPA 2010) and subject to the 2010 SP-5 Mitigation Monitoring and Reporting Program (Appendix T).

The Development Agreement is proposed between March JPA and Meridian Park West LLC with a 15-year term and two potential 5-year extensions.

Other Discretionary Approvals

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

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

3.6 Environmental Justice Element of the March JPA General Plan

Senate Bill 1000 (Government Code Section 65302[h]) requires jurisdictions to adopt an environmental justice element if the jurisdiction includes a disadvantaged community and two elements of the jurisdiction's General Plan are proposed for amendment. The March JPA planning area is within a disadvantaged community (Census Tract 6065046700) as identified by CalEnviroScreen 4.0. March JPA will need to adopt an Environmental Justice Element for its General Plan to address this requirement prior to considering approval of the Project.

In November 2023, March JPA released a Draft Environmental Justice Element. The Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a) (March JPA 2023). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the disadvantaged communities within unincorporated territory in the County of Riverside. March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement.

3.7 References Cited

March JPA (Joint Powers Authority). 1999. *General Plan of the March Joint Powers Authority.* https://marchjpa.com/wp-content/uploads/2023/03/General-Plan_03-07-2023.pdf

March JPA. 2010. Meridian Specific Plan Amendment (SP-5) Final Subsequent Environmental Impact Report. SCH#20009071069. July 2010.

March JPA. 2023. Draft Environmental Justice Element. November 2023. https://marchjpa.com/wp-content/uploads/2023/11/Draft-Environmental-Justice-Element.pdf

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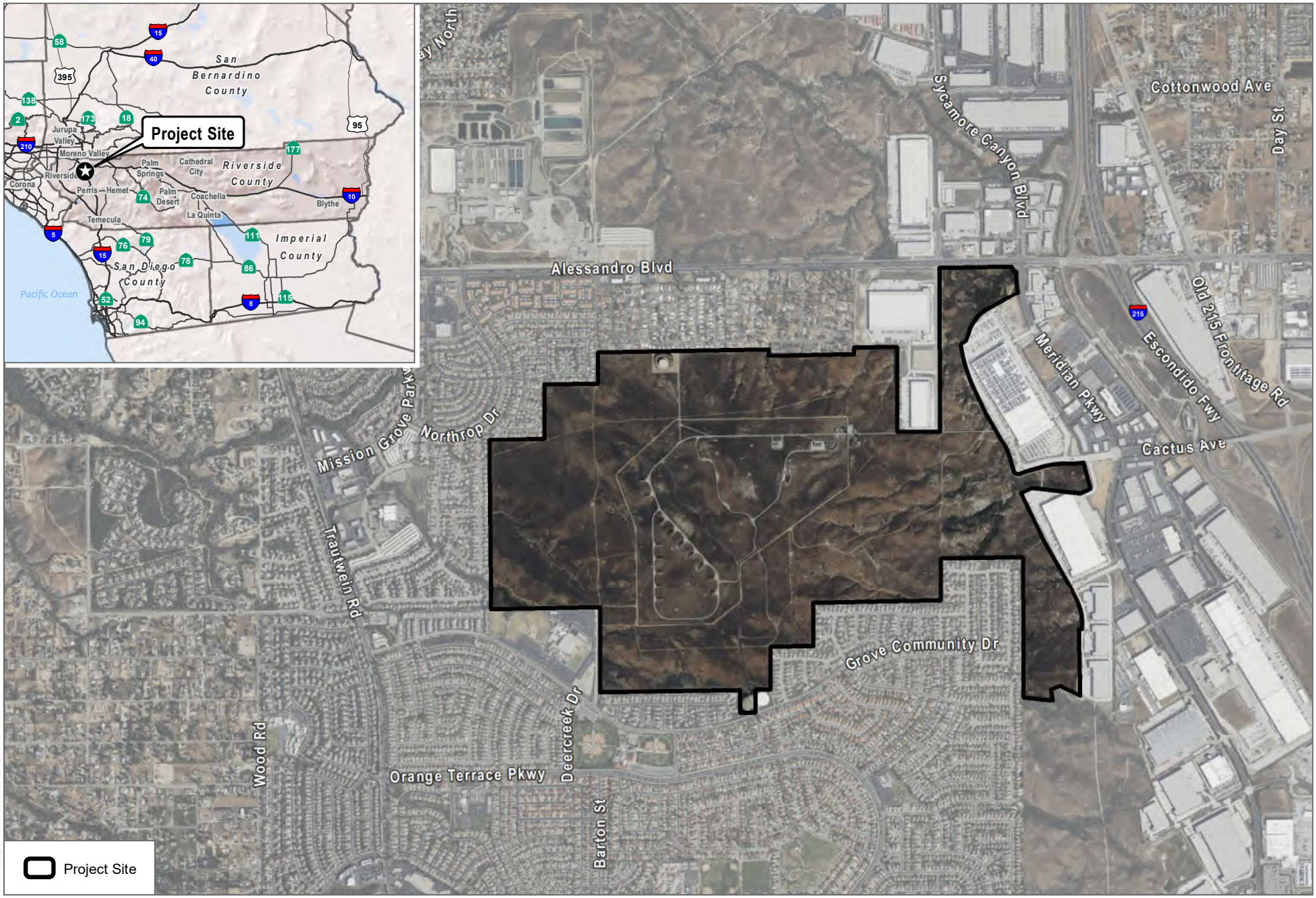

SOURCE: Bing Maps 2022

DUDEK

0 1000 2,000 Feet

FIGURE 3-1

Project Location

West Campus Upper Plateau EIR

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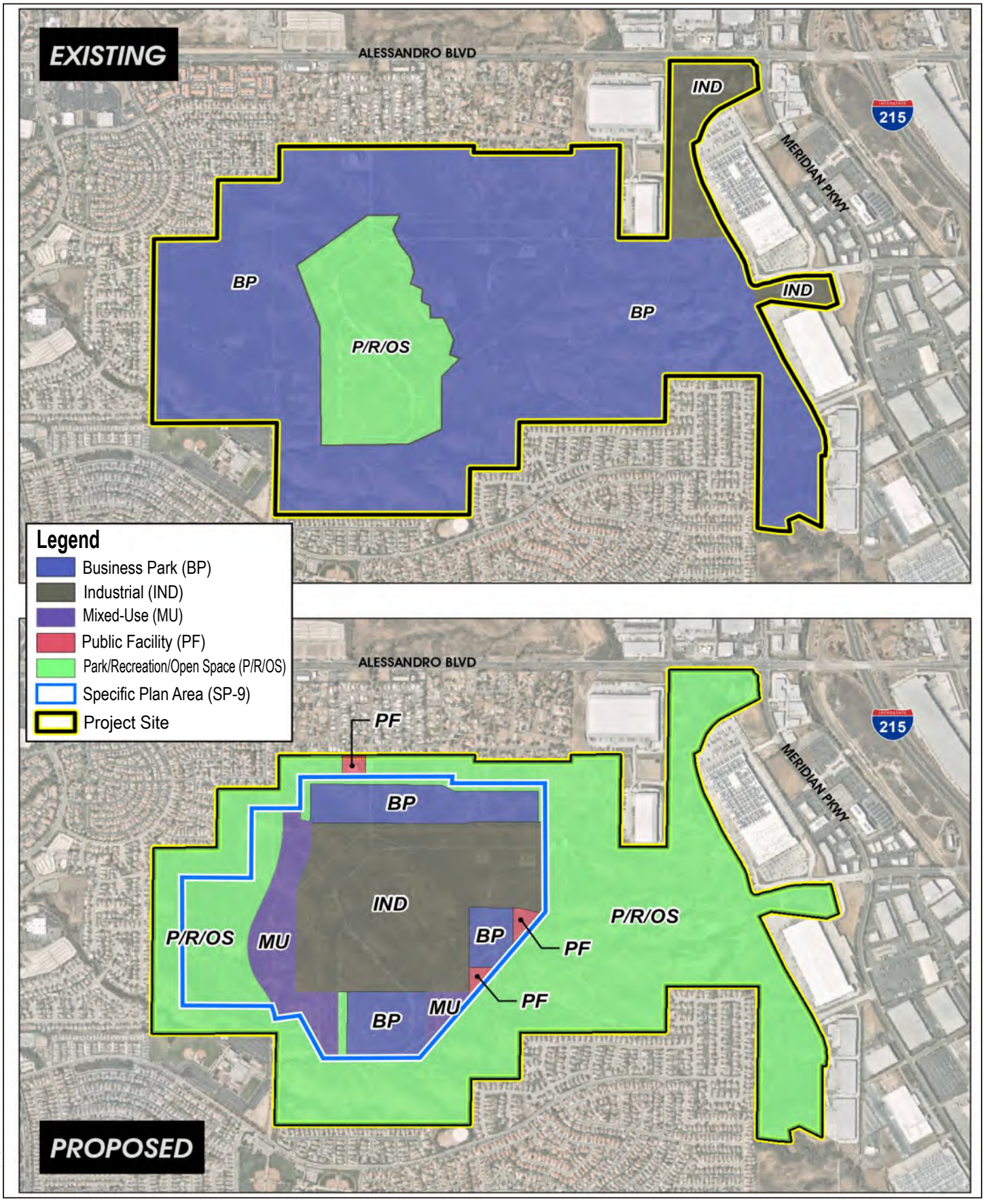

SOURCE: ESRI, March JPA General Plan (2017), Nearmap (2021)

FIGURE 3-2

March JPA General Plan Existing and Proposed Land Use Designations

West Campus Upper Plateau EIR

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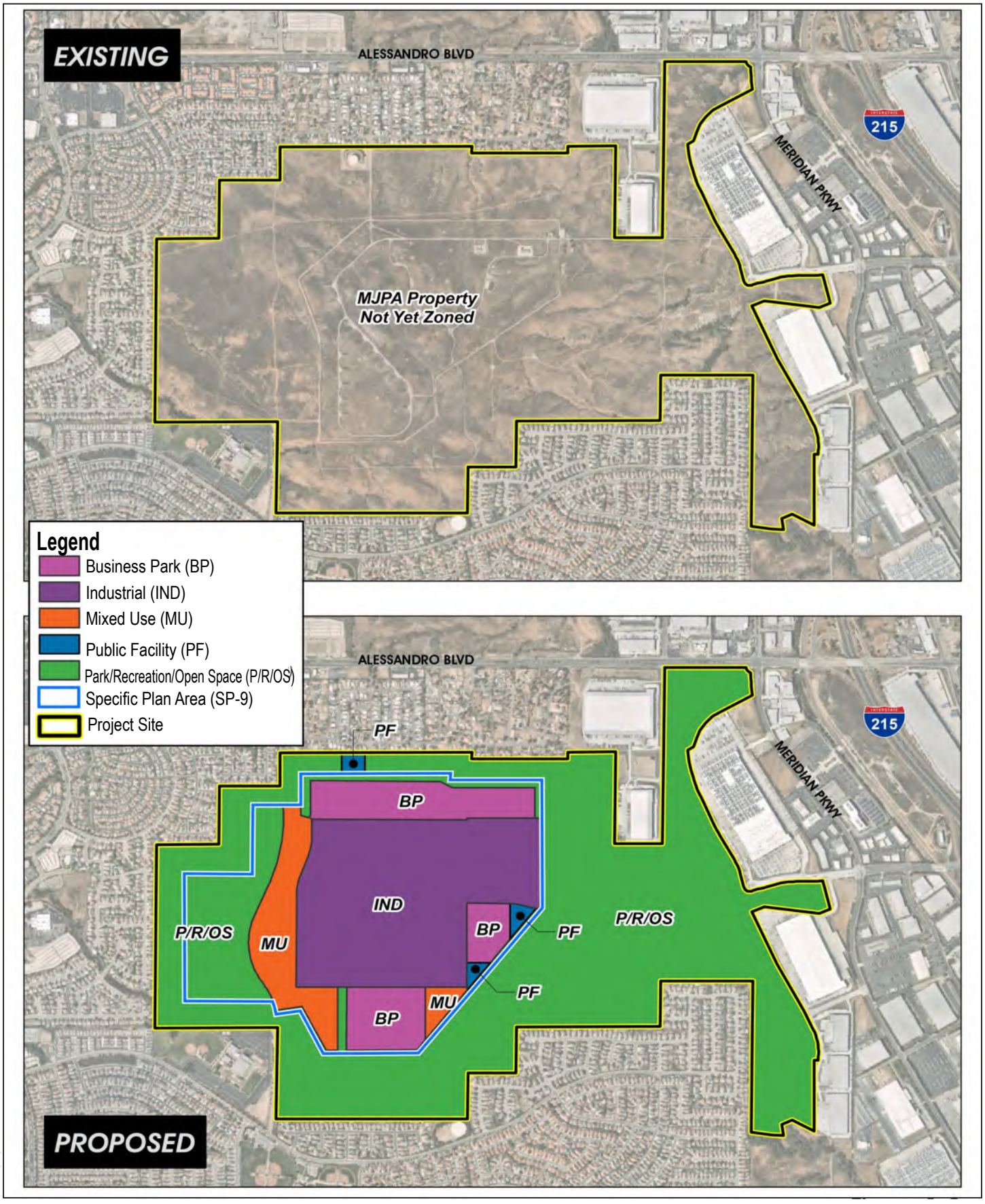

SOURCE: ESRI, March JPA General Plan (2017), Nearmap (2021)

FIGURE 3-3

March JPA Zoning Designations

West Campus Upper Plateau EIR

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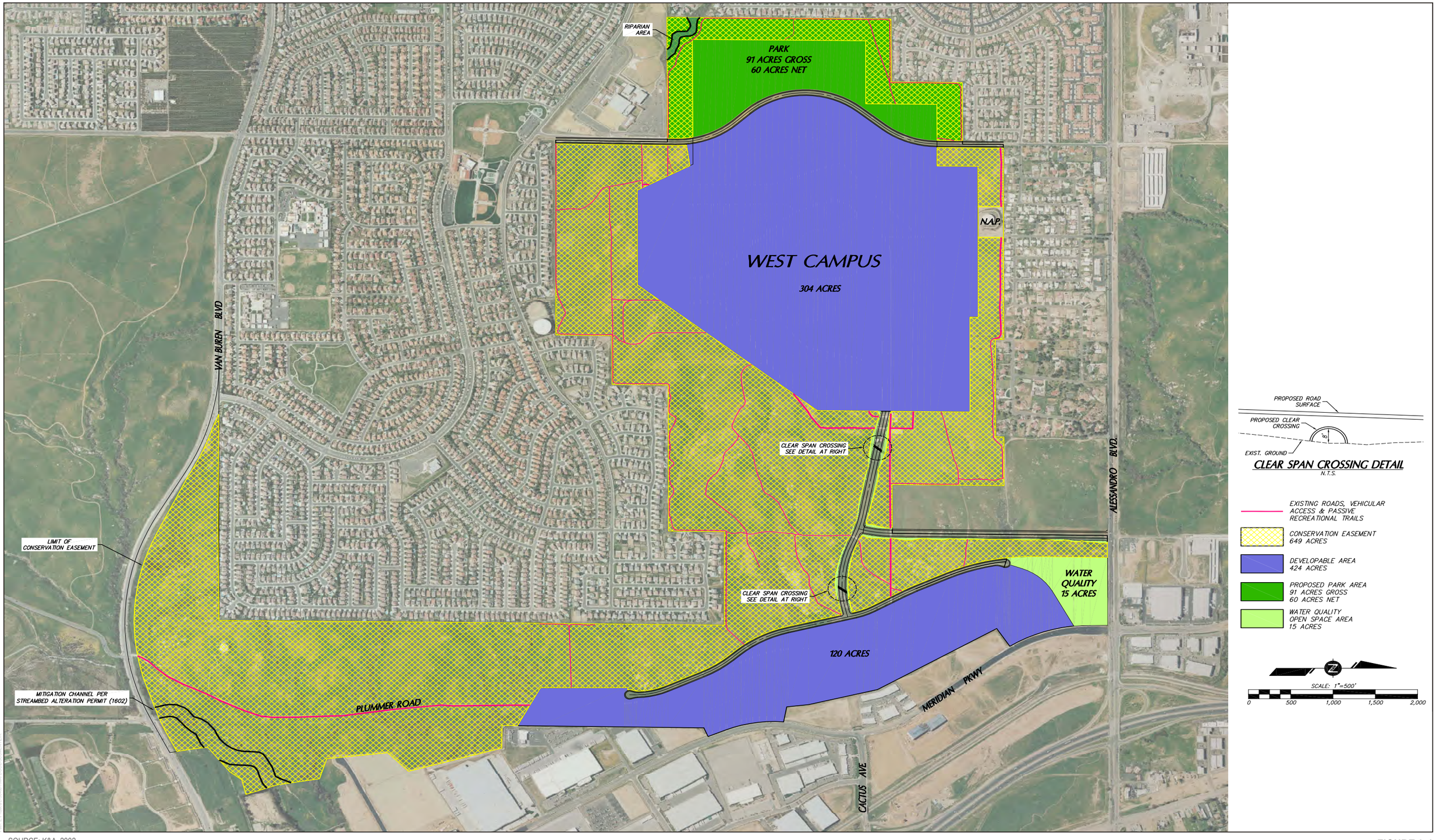

SOURCE: K&A, 2002

DUDEK 0 500 1,000 Feet

FIGURE 3-4

CBD Settlement Agreement

West Campus Upper Plateau EIR

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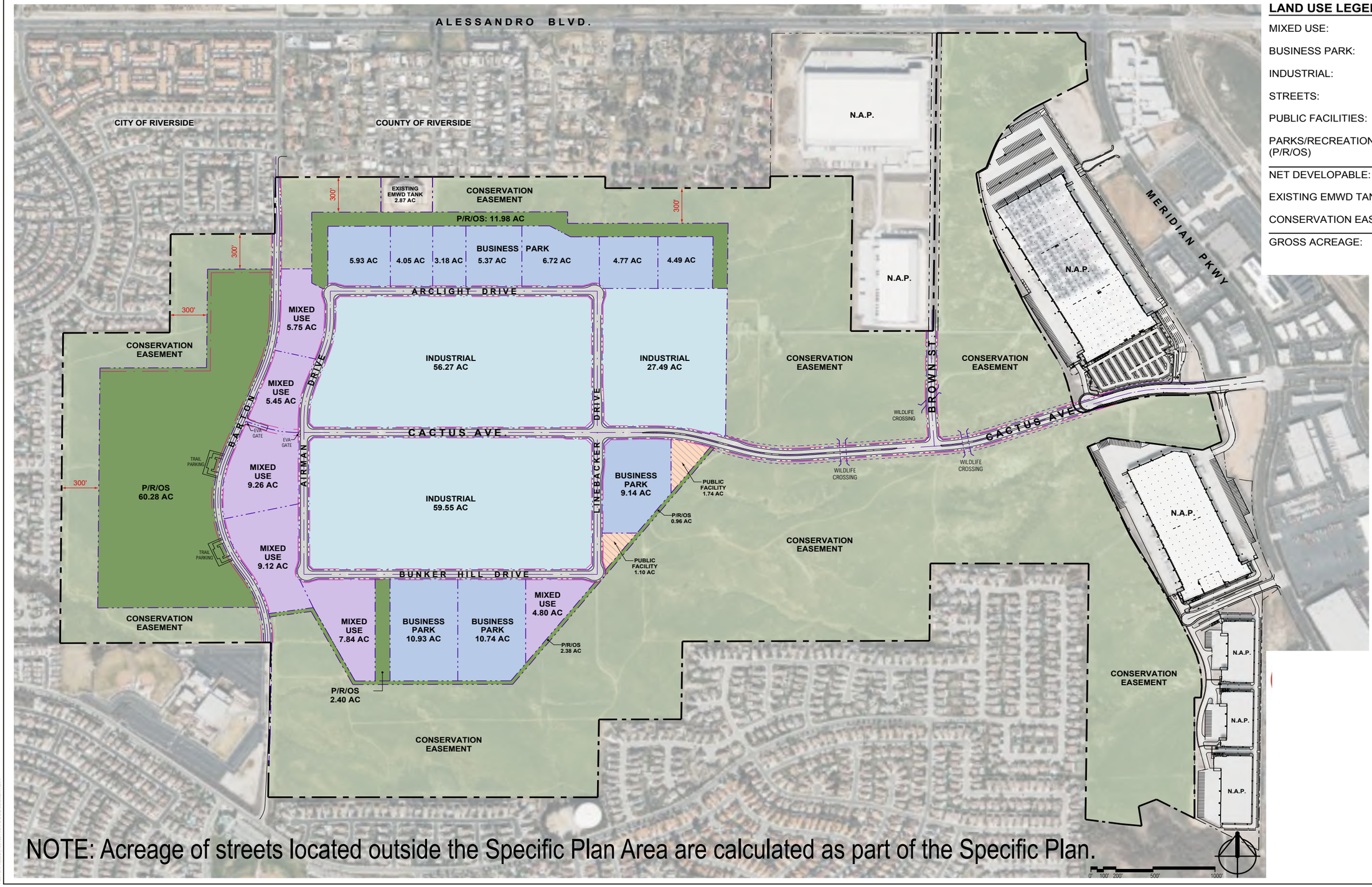

NOTE: Acreage of streets located outside the Specific Plan Area are calculated as part of the Specific Plan.

LAND USE LEGEND

MIXED USE:	42.22 AC
BUSINESS PARK:	65.32 AC
INDUSTRIAL:	143.31 AC
STREETS:	37.91 AC
PUBLIC FACILITIES:	2.84 AC
PARKS/RECREATION/OPEN SPACE: (P/R/OS)	78.00 AC
NET DEVELOPABLE:	369.60 AC
EXISTING EMWD TANK	2.87 AC
CONSERVATION EASEMENT:	445.43 AC
GROSS ACREAGE:	817.90 AC

SOURCE: RGA 2022

DUDEK 0 500 1,000 Feet

FIGURE 3-5

Site Plan

West Campus Upper Plateau EIR

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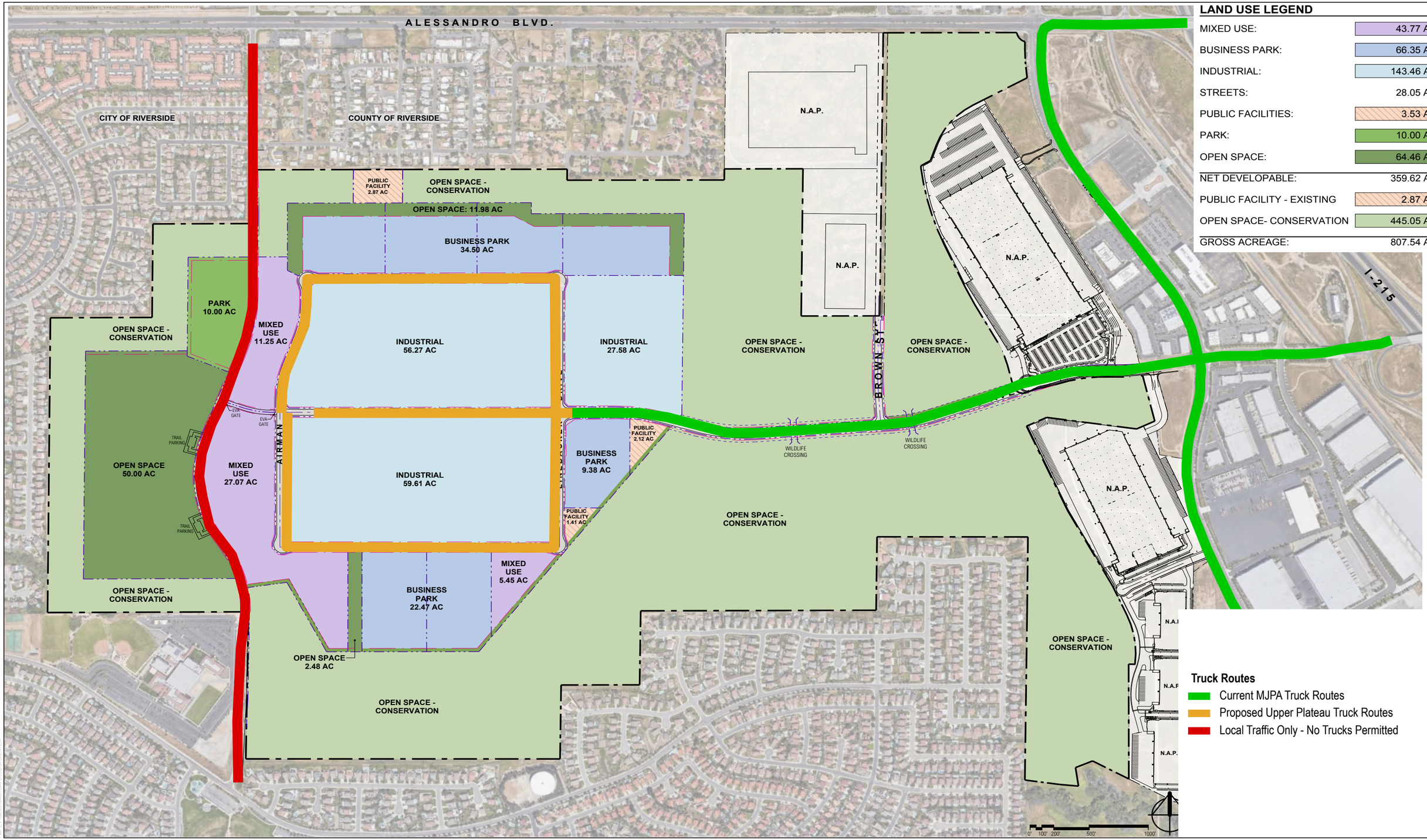

LAND USE LEGEND

MIXED USE:	43.77 AC
BUSINESS PARK:	66.35 AC
INDUSTRIAL:	143.46 AC
STREETS:	28.05 AC
PUBLIC FACILITIES:	3.53 AC
PARK:	10.00 AC
OPEN SPACE:	64.46 AC
NET DEVELOPABLE:	359.62 AC
PUBLIC FACILITY - EXISTING	2.87 AC
OPEN SPACE- CONSERVATION	445.05 AC
GROSS ACREAGE:	807.54 AC

Truck Routes

- Current MJPA Truck Routes
- Proposed Upper Plateau Truck Routes
- Local Traffic Only - No Trucks Permitted

SOURCE: RGA 2021

DUDEK 0 500 1,000 Feet

FIGURE 3-6

Proposed Truck Routes

West Campus Upper Plateau EIR

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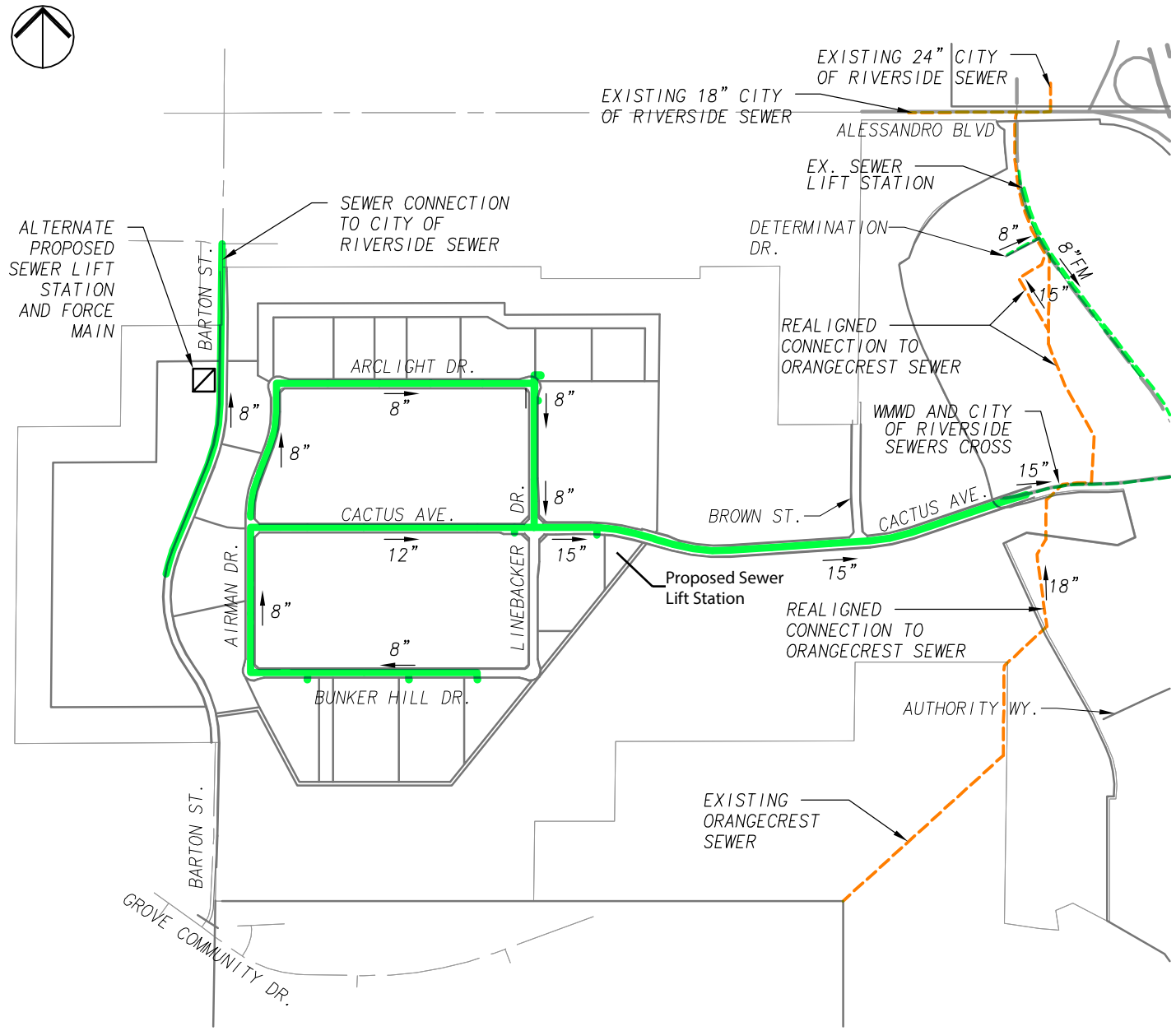

LEGEND

- SEWER SYSTEM
- XX" PROPOSED BUILDOUT SIZE
- EXISTING WMWD SEWER
- EXISTING CITY OF RIVERSIDE SEWER
- PROPOSED SEWER LIFT STATION

NOTE:

- CITY OF RIVERSIDE ORANGECREST SEWER FLOWS NORTH TO ALESSANDRO AND CONTINUES NORTH ALONG SYCAMORE CANYON BLVD.
- MERIDIAN WEST CAMPUS UPPER PLATEAU SEWER FLOWS FROM THE EASTERN PORTION OF THE SITE FLOWS EAST ALONG CACTUS AVE TO INNOVATION DRIVE AND FLOWS SOUTH TO THE WWRF TREATMENT FACILITY.

NOTE:

LOCATION AND CAPACITY OF FACILITIES ARE PRELIMINARY, SUBJECT TO CHANGE BASED ON MORE DETAILED STUDIES AND PROJECT DEVELOPMENT PHASING.

SOURCE: DRC Engineering, 2023

FIGURE 3-7A

Sewer System

West Campus Upper Plateau EIR

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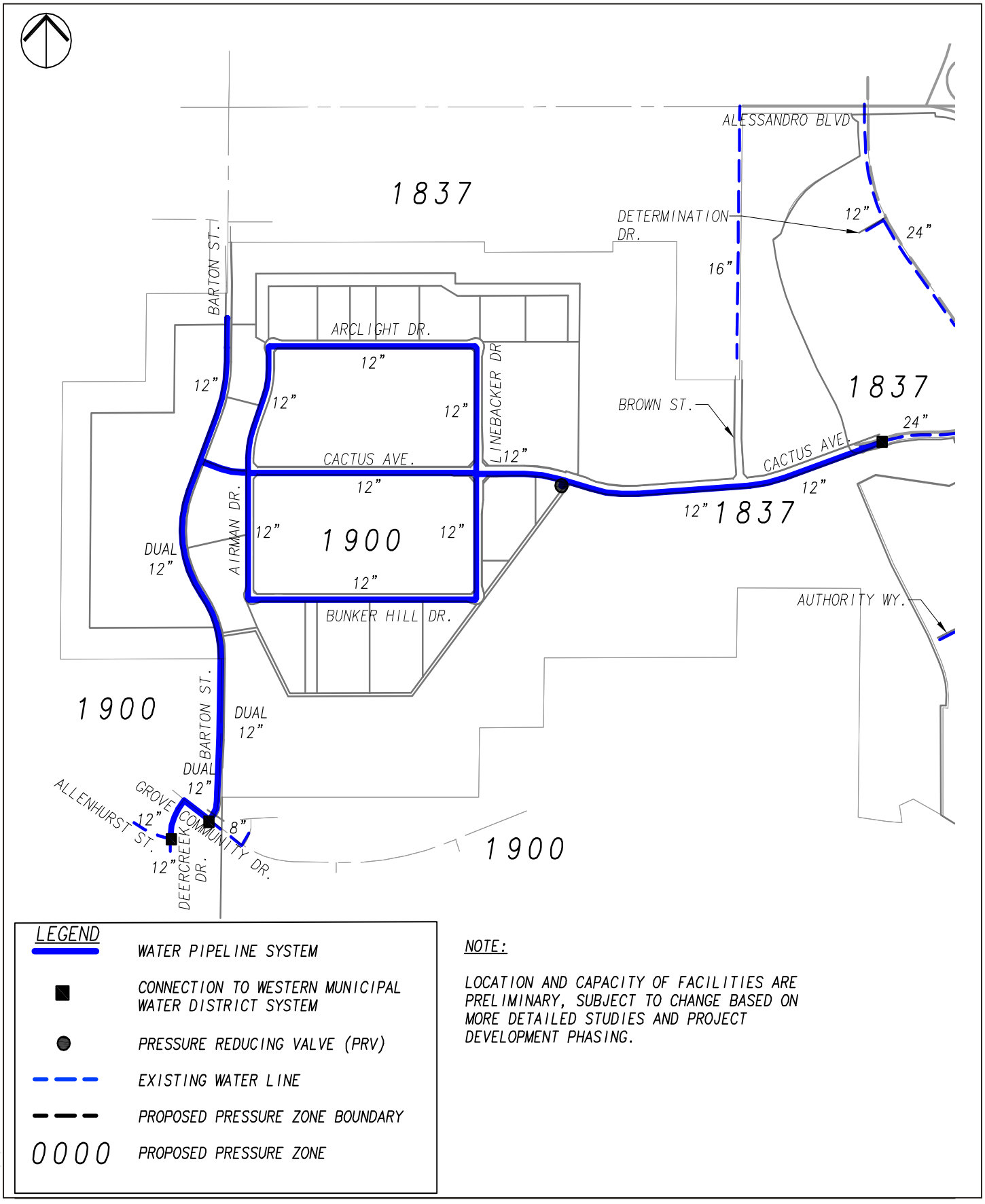

SOURCE:DRC Engineering, 2022

FIGURE 3-7B

Potable Water System

West Campus Upper Plateau EIR

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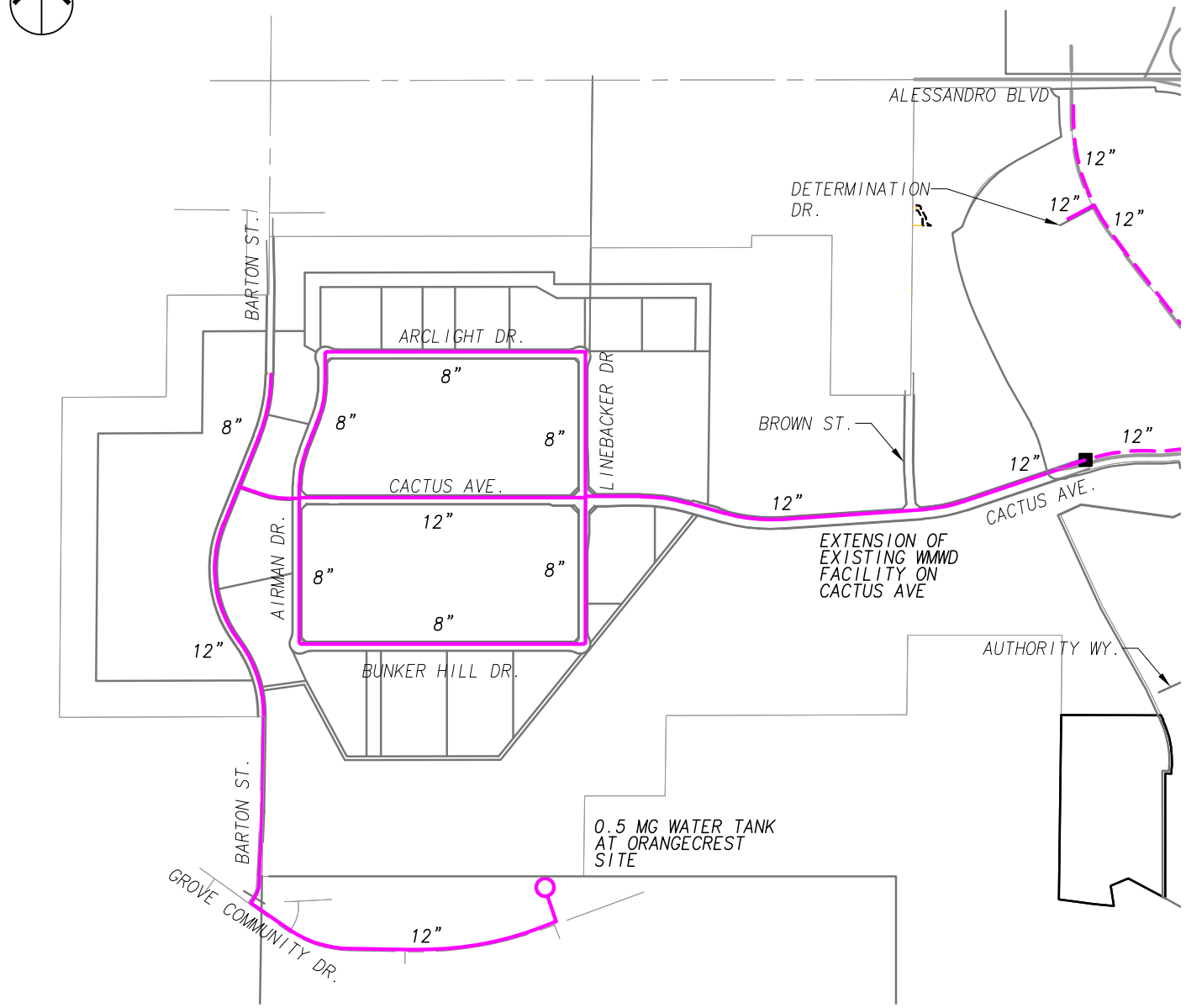

LEGEND

- PROPOSED MBC RECLAIMED WATER SYSTEM
- EXISTING PIPELINE
- CONNECTION TO WMWD NON-POTABLE SYSTEM

NOTE:

LOCATION AND CAPACITY OF FACILITIES ARE PRELIMINARY, SUBJECT TO CHANGE BASED ON MORE DETAILED STUDIES AND PROJECT DEVELOPMENT PHASING.

SOURCE: DRC Engineering, 2023

FIGURE 3-7C

Reclaimed Water System

West Campus Upper Plateau EIR

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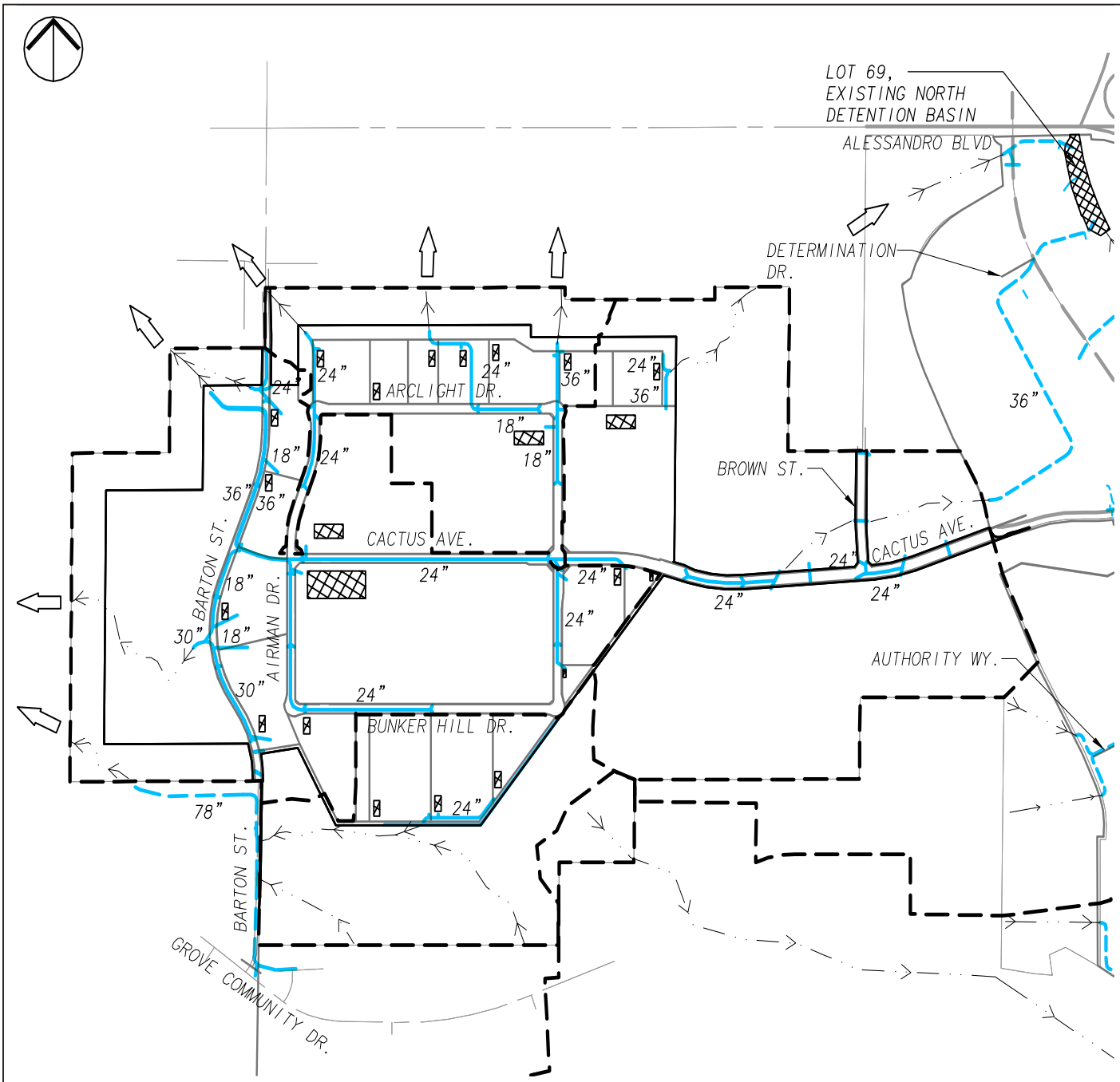

LEGEND

- PR. PUBLIC STORM DRAIN SYSTEM
- EX. PUBLIC STORM DRAIN SYSTEM
- PRIVATE DETENTION BASIN
- OPEN CHANNEL
- DRAINAGE DIVIDE

NOTE:
DETENTION SYSTEMS IN THE PUBLIC RIGHT OF WAY OR LLMD TO BE MAINTAINED BY THE LLMD. DETENTIONS SYSTEMS ON PRIVATE PROPERTY TO BE MAINTAINED BY THE LAND OWNER.

NOTE:
LOCATION AND CAPACITY OF FACILITIES ARE PRELIMINARY, SUBJECT TO CHANGE BASED ON MORE DETAILED STUDIES AND PROJECT DEVELOPMENT PHASING.

SOURCE: DRC Engineering, 2022

FIGURE 3-7D

Storm Drain System

West Campus Upper Plateau EIR

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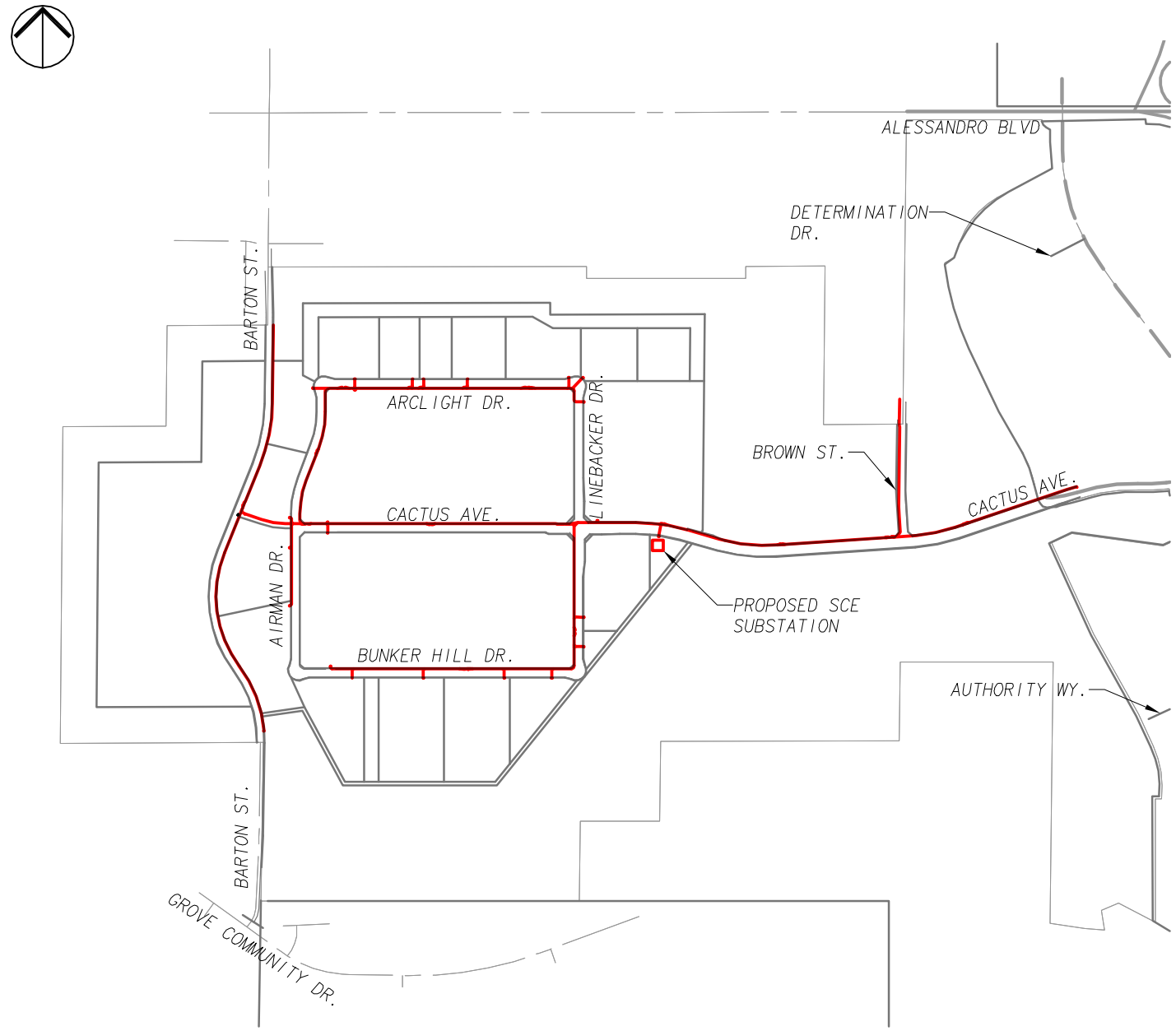

LEGEND

ELECTRICAL BACKBONE

NOTE:
LOCATION AND CAPACITY OF FACILITIES ARE PRELIMINARY, SUBJECT TO CHANGE BASED ON MORE DETAILED STUDIES AND PROJECT DEVELOPMENT PHASING.

SOURCE: DRC Engineering, 2023

FIGURE 3-7E

Electrical Backbone

West Campus Upper Plateau EIR

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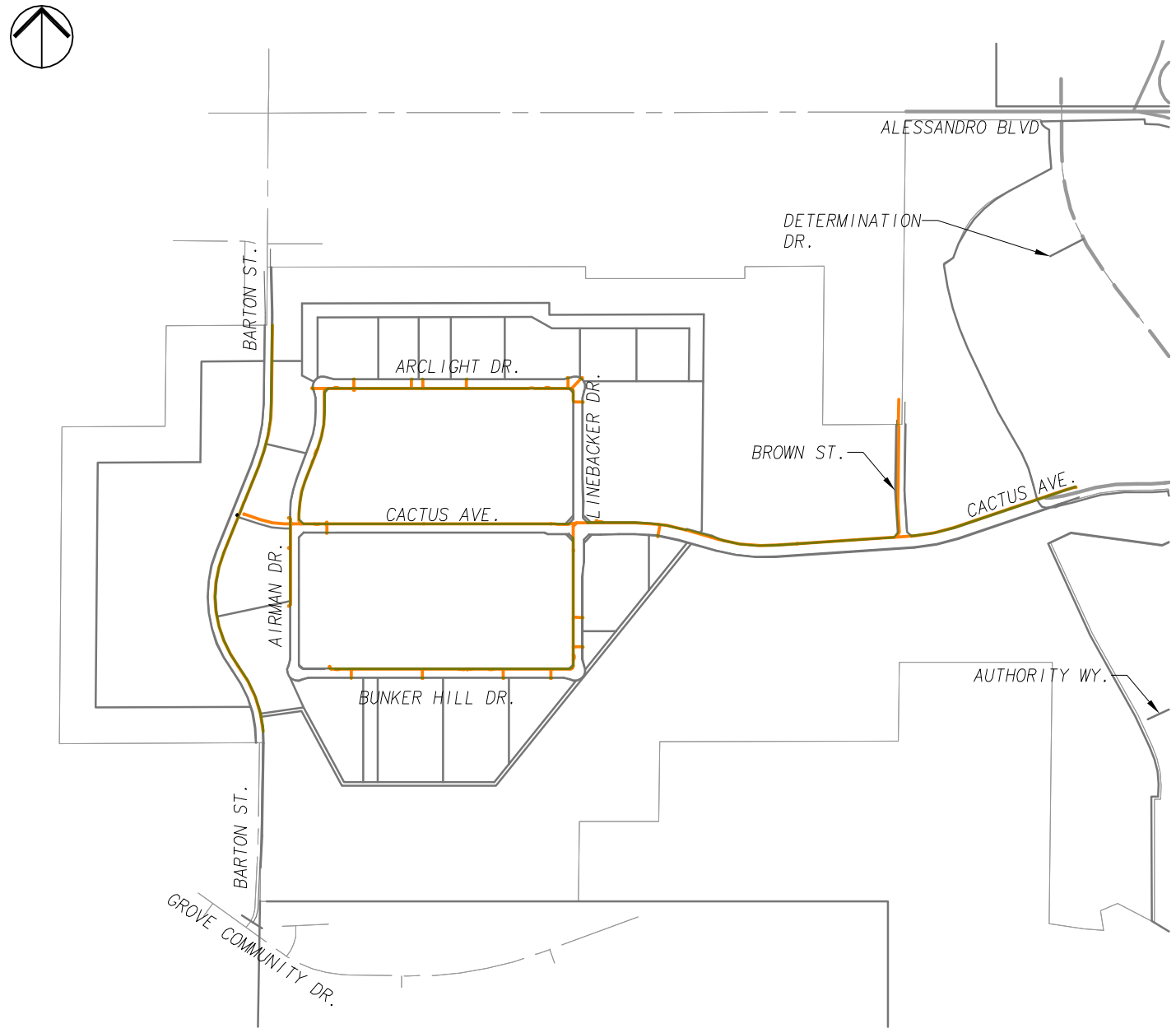

LEGEND

TELEPHONE BACKBONE (FRONTIER)

NOTE:
LOCATION AND CAPACITY OF FACILITIES ARE PRELIMINARY, SUBJECT TO CHANGE BASED ON MORE DETAILED STUDIES AND PROJECT DEVELOPMENT PHASING.

SOURCE: DRC Engineering, 2023

FIGURE 3-7F

Telephone Backbone

West Campus Upper Plateau EIR

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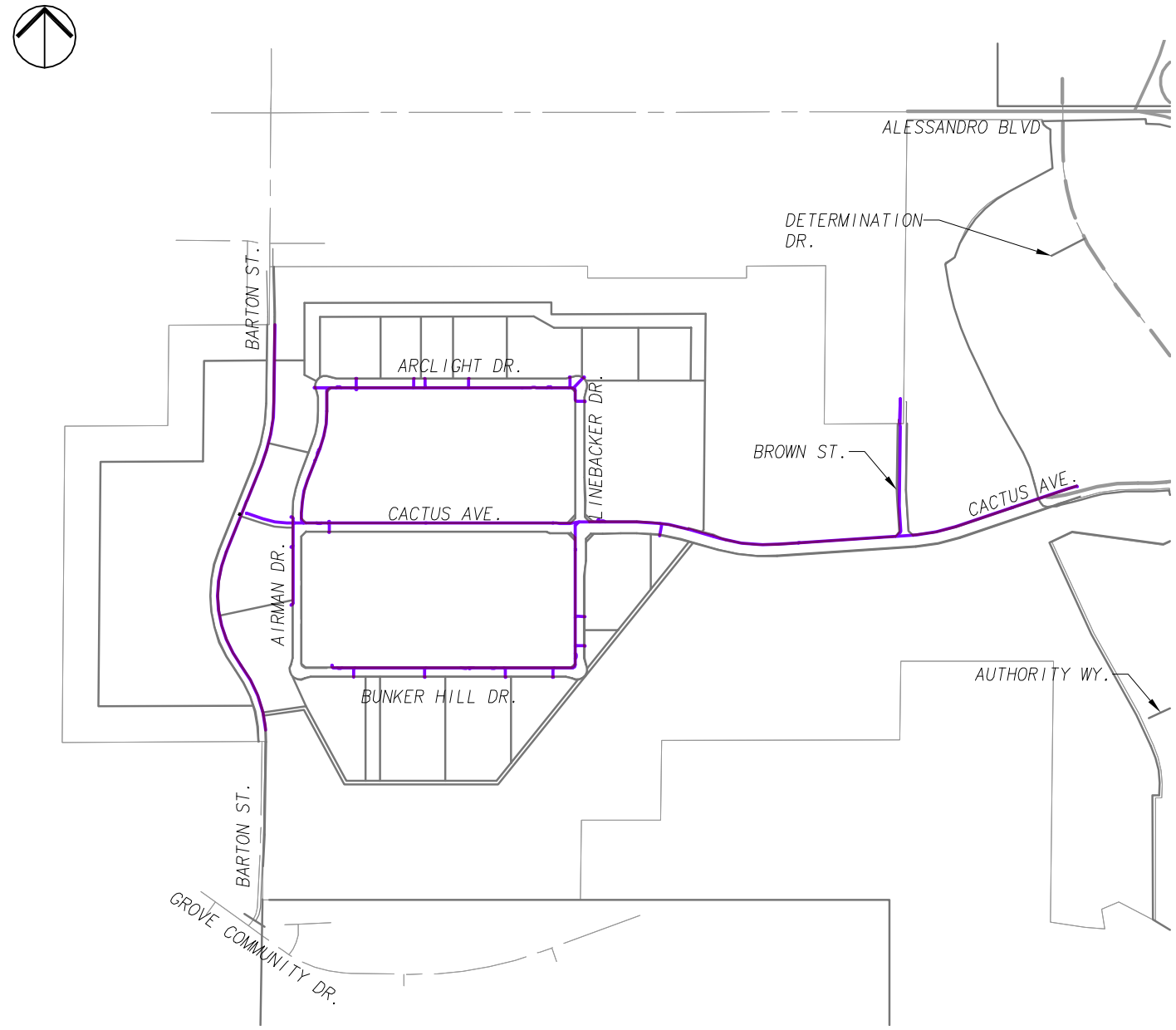

LEGEND

CABLE TV BACKBONE (CHARTER)

NOTE:
LOCATION AND CAPACITY OF FACILITIES ARE PRELIMINARY, SUBJECT TO CHANGE BASED ON MORE DETAILED STUDIES AND PROJECT DEVELOPMENT PHASING.

SOURCE: DRC Engineering, 2023

FIGURE 3-7G

Cable TV Backbone

West Campus Upper Plateau EIR

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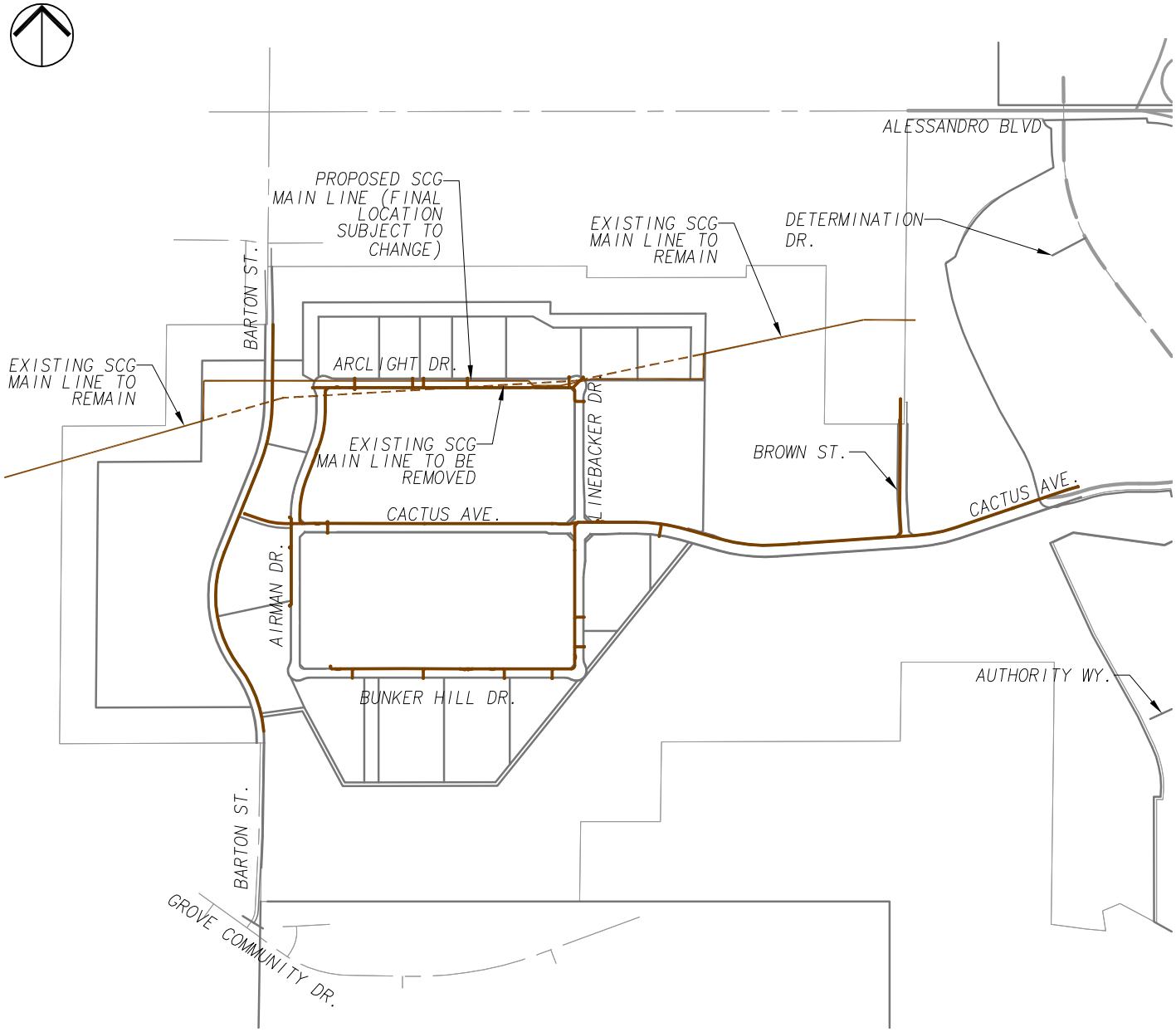

LEGEND

GAS BACKBONE

NOTE:
LOCATION AND CAPACITY OF FACILITIES ARE PRELIMINARY, SUBJECT TO CHANGE BASED ON MORE DETAILED STUDIES AND PROJECT DEVELOPMENT PHASING.

SOURCE: DRC Engineering, 2023

FIGURE 3-7H

Gas Bakbone

West Campus Upper Plateau EIR

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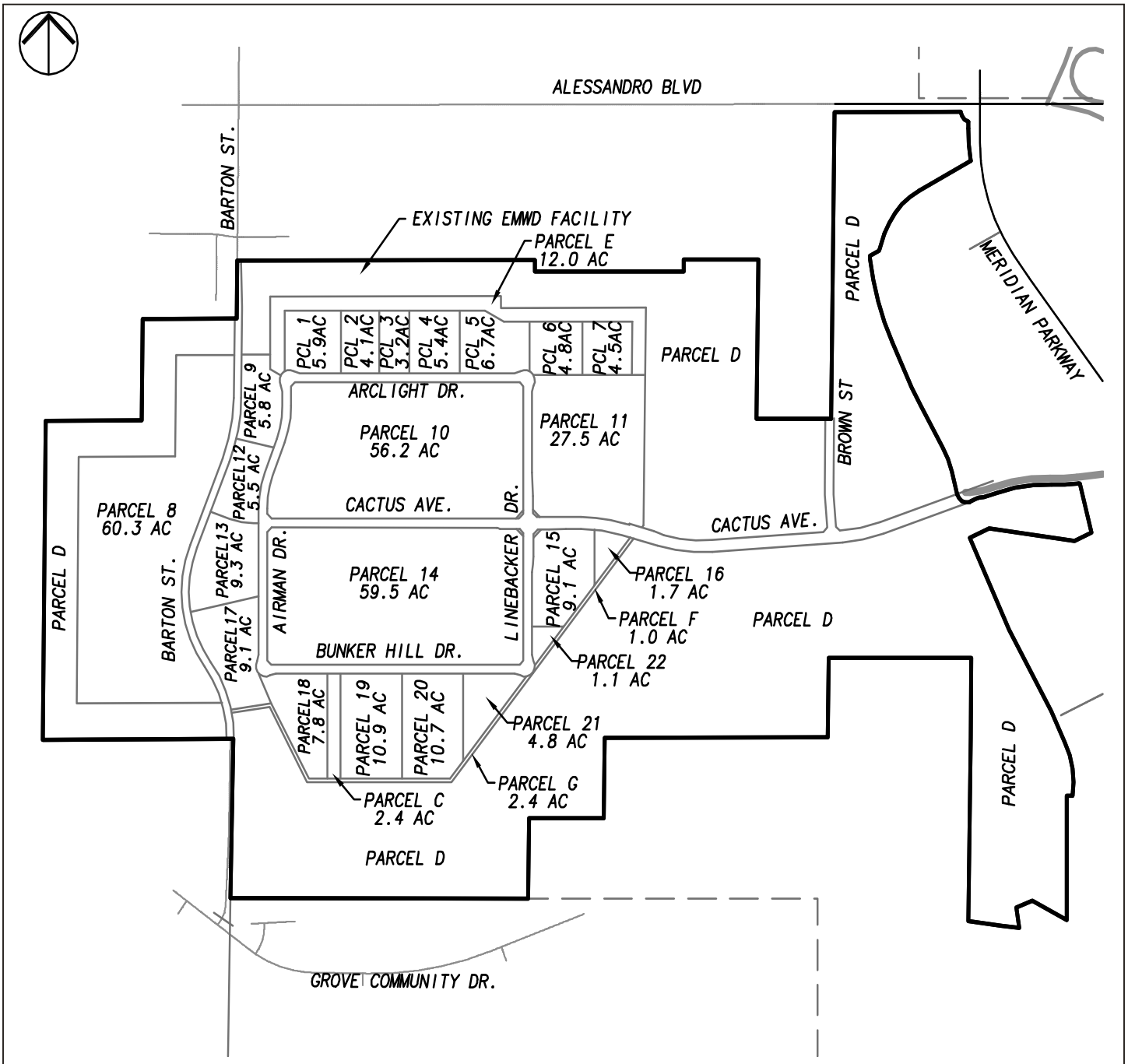

LEGEND

PARCEL LINES

NOTE:
LETTERED PARCELS FOR PROPOSED PUBLIC RIGHT OF WAY NOT SHOWN ON EXHIBIT FOR CLARITY
TENTATIVE PARCEL MAP 38063

SOURCE: DRC Enginerring, 2022

FIGURE 3-8

Tentative Parcel Map

West Campus Upper Plateau EIR

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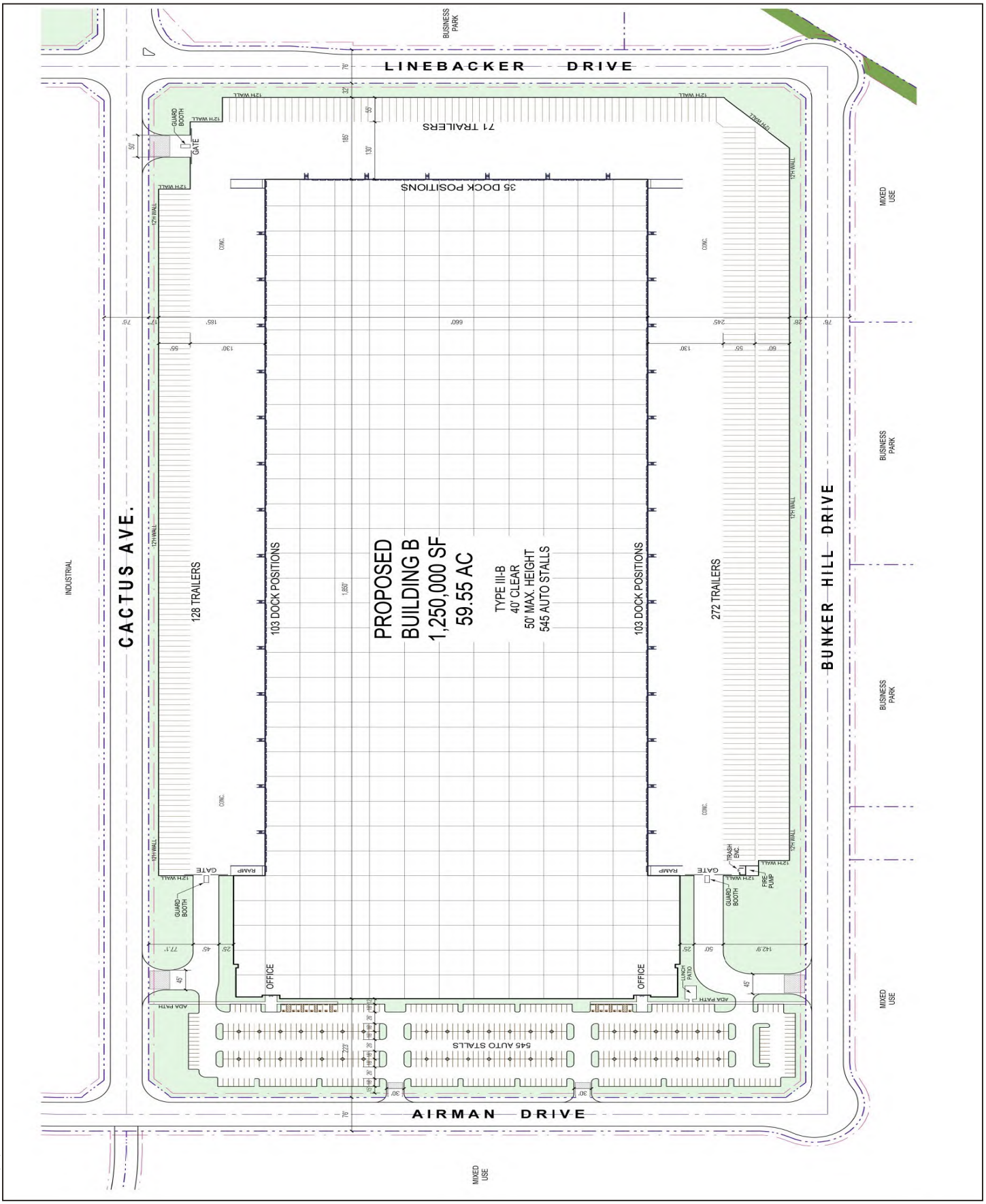

SOURCE: RGA

FIGURE 3-9

Plot Plan – Building B

West Campus Upper Plateau EIR

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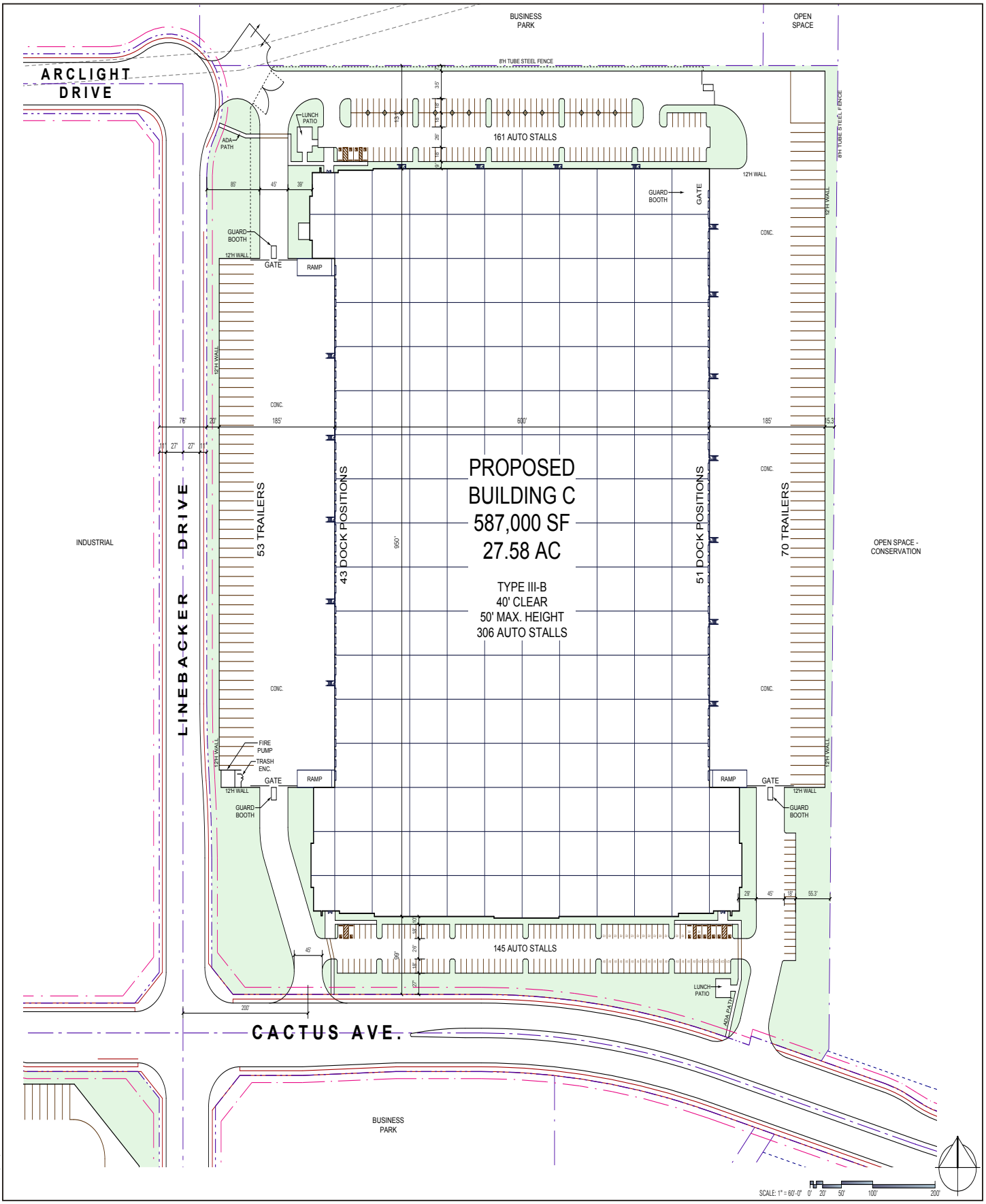

SOURCE: RGA

FIGURE 3-10

Plot Plan – Building C

West Campus Upper Plateau EIR

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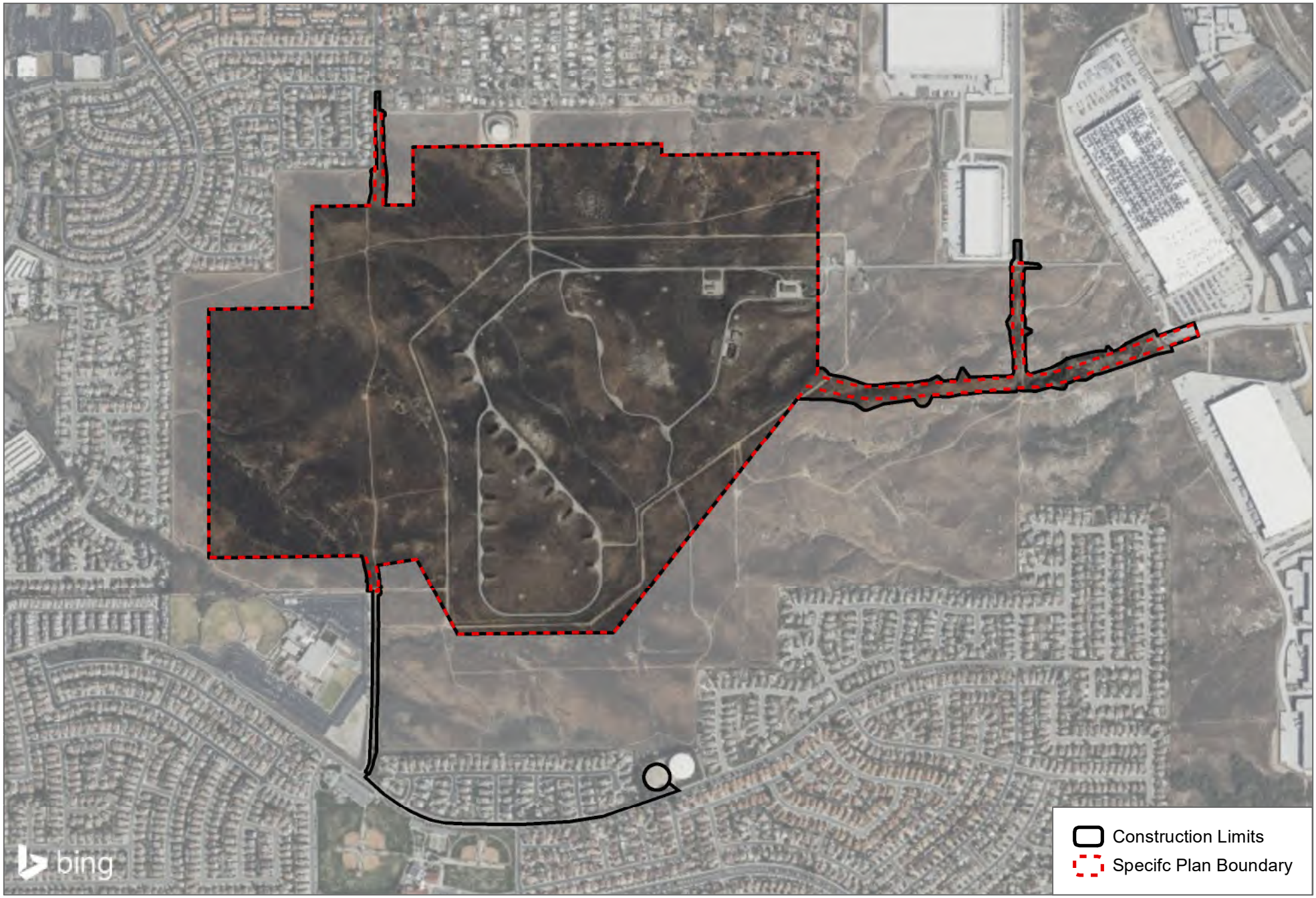

SOURCE: Bing Imagery 2023

DUDEK

0 650 1,300 Feet

FIGURE 3-11

Construction Limits

West Campus Upper Plateau EIR

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4.2 Air Quality

This recirculated section describes the existing air quality conditions of the proposed West Campus Upper Plateau Project (Project) site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the proposed Project.

This analysis is based on emission calculations and California Emissions Estimator Model (CalEEMod) outputs presented in the Revised Air Quality Impact Analysis ~~Technical Report~~ (Appendix C-1), ~~and~~ Revised Health Risk Assessment Technical Report (Appendix C-2), and the Amicus Curiae Briefs of the South Coast Air Quality Management District and the San Joaquin Valley Unified Air Pollution Control District in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (Friant Ranch) (Appendix C-3).

As discussed in detail in Chapter 3, Project Description of this EIR, the Specific Plan outlines the land uses planned for the Project area, and this Draft EIR assumes the following buildout of the Specific Plan Area for analysis:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facilities – 2.84 acres for future sewer lift station and electrical substation

The proposed Project also includes the establishment of a 445.43-acre Conservation Easement in compliance with the Center for Biological Diversity (CBD) Settlement Agreement (Appendix S).

4.2.1 Existing Conditions

The Project site is partially developed as a former military weapons storage/bunker facility and is presently used as a commercial storage facility for pyrotechnics. The site is located within the South Coast Air Basin (SCAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The SCAB is characterized as having a Mediterranean climate (typified as semiarid with mild winters, warm summers, and moderate rainfall). The SCAB is a 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. It includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties.

Climate and Meteorology

The SCAB generally lies in the semi-permanent, high-pressure zone of the eastern Pacific. As a result, the climate is mild and tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution

problem in the SCAB is a function of the area's natural physical characteristics (e.g., weather and topography) and human-made influences (e.g., development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and/or dispersion of pollutants throughout the SCAB.

Climate

Moderate temperatures, comfortable humidity, and limited precipitation characterize the climate in the SCAB. The average annual temperature varies little throughout the basin, averaging from the low to middle 60s°F. However, with a less pronounced oceanic influence, the eastern inland portions of the SCAB show greater variability in annual minimum and maximum temperatures. All portions of the SCAB have recorded temperatures of greater than 100°F in recent years. Although the SCAB has a semiarid climate, the air near the surface is moist because of the presence of a shallow marine layer. Except for infrequent periods when dry air is brought into the SCAB by offshore winds, the ocean effect is dominant. Periods with heavy fog are frequent, and low stratus clouds, occasionally referred to as "high fog," are a characteristic climate feature. Annual average relative humidity is 71% at the coast and 59% in the eastern part of the SCAB. Precipitation in the SCAB is typically 9 to 14 inches annually and is rarely in the form of snow or hail, due to typically warm weather. The frequency and amount of rainfall is greater in the coastal areas of the SCAB. March Air Reserve Base, located proximate to the Project site, is an area that is characterized by relatively low rainfall, with warm summers and mild winters. Average temperatures range from a high of 95°F in July to a low of 40°F in December (WRCC 2022).

Sunlight

The presence and intensity of sunlight are necessary prerequisites for the formation of photochemical smog. Under the influence of the ultraviolet radiation of sunlight, certain "primary" pollutants (mainly reactive hydrocarbons and oxides of nitrogen [NO_x]) react to form "secondary" pollutants (primarily oxidants). Since this process is time dependent, secondary pollutants can be formed many miles downwind of the emission sources. Due to the prevailing daytime winds and time-delayed nature of photochemical smog, oxidant concentrations are highest in the inland areas of Southern California.

Temperature Inversions

Under ideal meteorological conditions and irrespective of topography, pollutants emitted into the air mix and disperse into the upper atmosphere. However, the Southern California region frequently experiences temperature inversions in which pollutants are trapped and accumulate close to the ground. The inversion, a layer of warm, dry air overlaying cool, moist marine air, is a normal condition in coastal Southern California. The cool, damp, and hazy sea air capped by coastal clouds is heavier than the warm, clear air, which acts as a lid through which the cooler marine layer cannot rise. The height of the inversion is important in determining pollutant concentration. When the inversion is approximately 2,500 feet above mean sea level, the sea breezes carry the pollutants inland to escape over the mountain slopes or through the passes. At a height of 1,200 feet above mean sea level, the terrain prevents the pollutants from entering the upper atmosphere, resulting in the pollutants settling in the foothill communities. Below 1,200 feet above mean sea level, the inversion puts a tight lid on pollutants, concentrating them in a shallow layer over the entire coastal basin. Usually, inversions are lower before sunrise than during the daylight hours. Mixing heights for inversions are lower in the summer and inversions are more persistent, being partly responsible for the high levels of ozone (O_3) observed during summer months in the SCAB. Smog in Southern California is generally the result of these temperature inversions combining with coastal day winds and local mountains to contain the pollutants for long periods, allowing them to form secondary pollutants by reacting in the presence of

sunlight. The SCAB has a limited ability to disperse these pollutants due to typically low wind speeds and the surrounding mountain ranges.

The Project site is located in an area that is susceptible to air inversions. This traps a layer of stagnant air near the ground where pollutants are further concentrated. These inversions produce haziness, which is caused by moisture, suspended dust, and a variety of chemical aerosols emitted by trucks, automobiles, furnaces, and other sources.

4.2.1.1 Air Quality Characteristics

Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion for the pollutants. Reduced visibility, eye irritation, and adverse health impacts on people who are deemed sensitive receptors are the most serious hazards that can result from changes in existing air quality conditions in the area. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution include children, older adults, and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993).

The Project site is located within the Source Receptor Area (SRA) 23 – Metropolitan Riverside County. Within SRA 24, the SCAQMD Metropolitan Riverside County 1 monitoring station is located 8.4 miles northwest of the Project site and is the nearest long-term air quality monitoring site for O_3, carbon monoxide (CO), nitrogen dioxide (NO_2), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM_{10}), and particulate matter with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$).

The most recent 3 years of data available are shown in Table 4.2-1 and identify the number of days ambient air quality standards were exceeded for the study area, which is considered to be representative of the local air quality at the Project site. Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ for ~~2018 through 2020~~ 2019 through 2021 was obtained from the SCAQMD Air Quality Data Tables (SCAQMD ~~2021a~~ 2023a). Data for SO_2 has been omitted since attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations.

Table 4.2-1. Project Area Air Quality Monitoring Summary ~~2018–2020~~ 2019–2021

Pollutant	Standard	Year			
		~~2018~~	2019	2020	2021
O_3					
Maximum Federal 1-Hour Concentration (ppm)	N/A	~~0.123~~	0.123	0.143	0.117
Maximum Federal 8-Hour Concentration (ppm)	N/A	~~0.101~~	0.096	0.115	0.097
Number of Days Exceeding State 1-Hour Standard	>0.09 ppm	~~22~~	24	46	20
Number of Days Exceeding State/Federal 8-Hour Standard	>0.070 ppm	~~53~~	59	81	57
CO					
Maximum Federal 1-Hour Concentration	>35 ppm	~~2.2~~	1.5	1.9	2.1
Maximum Federal 8-Hour Concentration	>20 ppm	~~2.0~~	1.2	1.4	1.8

Table 4.2-1. Project Area Air Quality Monitoring Summary ~~2018–2020~~ 2019–2021

Pollutant	Standard	Year			
		~~*2018*~~	*2019*	*2020*	*2021*
NO_2					
Maximum Federal 1-Hour Concentration	>0.100 ppm	~~0.055~~	0.056	0.066	0.052
Annual Federal Standard Design Value	N/A	~~0.014~~	0.014	0.014	0.014
PM_{10}					
Maximum Federal 24-Hour Concentration (µg/m³)	>150 µg/m³	~~126~~	99	104	76
Annual Federal Arithmetic Mean (µg/m³)	N/A	~~44.0~~	34.4	30.0	34.2
Number of Days Exceeding Federal 24-Hour Standard	>150 µg/m³	~~0~~	0	0	0
Number of Days Exceeding State 24-Hour Standard	>50 µg/m³	~~132~~	21	110	16
$PM_{2.5}$					
Maximum Federal 24-Hour Concentration (µg/m³)	>35 µg/m³	~~50.70~~	46.70	41.00	82.1
Annual Federal Arithmetic Mean (µg/m³)	>12 µg/m³	~~12.41~~	11.13	12.63	12.58
Number of Days Exceeding Federal 24-Hour Standard	>35 µg/m³	~~2~~	4	4	10

Source: Data for O_3, CO, NO_2, PM_{10}, and $PM_{2.5}$ was obtained from SCAQMD Air Quality Data Tables (SCAQMD ~~2021a~~ 2023a).
NO_2 = nitrogen dioxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; µg/m³ = micrograms per cubic meter; ppm = parts per million by volume; N/A = not applicable.

Local Attainment Status

Pursuant to the 1990 federal Clean Air Act Amendments, the U.S. Environmental Protection Agency (EPA) classifies air basins (or portions thereof) as "attainment" or "nonattainment" for each criteria air pollutant based on whether the National Ambient Air Quality Standards (NAAQS) have been achieved. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified" or "unclassifiable." The designation of "unclassifiable/attainment" means that the area meets the standard or is expected to meet the standard despite a lack of monitoring data. Areas that achieve the standards after a nonattainment designation are redesignated as maintenance areas and must have approved Maintenance Plans to ensure continued attainment of the standards. The California Clean Air Act, like its federal counterpart, called for the designation of areas as "attainment" or "nonattainment," but based on the California Ambient Air Quality Standards (CAAQS) rather than the NAAQS.

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB, where the Project is located. The entire SCAB is designated as a nonattainment area for federal and state O_3 standards. EPA has classified the SCAB as an extreme nonattainment area and has mandated that it achieve attainment no later than June 15, 2024. The SCAB is designated as an attainment area for state and federal CO standards. The SCAB is designated as an attainment area under the state and federal standards for NO_2. The entire SCAB is in attainment with federal and state SO_2 standards. Only the Los Angeles County portion of the SCAB has been designated as nonattainment for the federal rolling 3-month average lead standard, and the SCAB is designated attainment for the state lead standard. The SCAB is designated as a nonattainment area for state PM_{10} standards; however, it is designated as an attainment area for federal standards. In regard to $PM_{2.5}$ attainment status, the SCAB is designated as a nonattainment area by the California

Air Resources Board (CARB) and EPA (CARB 2018; EPA 2018). The attainment classifications for these criteria pollutants are outlined in Table 4.2-2.

Table 4.2-2. South Coast Air Basin Attainment Classifications

Pollutant	Averaging Time	Designation/Classification
Federal Standards		
O_3	8 hours	Nonattainment/Extreme
NO_2	1 hour	Unclassifiable/attainment
	Annual arithmetic mean	Attainment (maintenance)
CO	1 hour; 8 hours	Attainment (maintenance)
SO_2	24 hours; annual arithmetic mean	Unclassifiable/attainment
PM_{10}	24 hours	Attainment (maintenance)
$PM_{2.5}$	24 hours; annual arithmetic mean	Nonattainment (serious)
Lead	Quarter	Unclassifiable/attainment
	3-month average	Nonattainment (partial)[a]
State Standards		
O_3	1 hour; 8 hours	Nonattainment
NO_2	1 hour; annual arithmetic mean	Attainment (partial)[c]
CO	1 hour; 8 hours	Attainment
SO_2	1 hour; 24 hours	Attainment
PM_{10}	24 hours; annual arithmetic mean	Nonattainment
$PM_{2.5}$	Annual arithmetic mean	Nonattainment
Lead[b]	30-day average	Attainment
Sulfates (SO_4)	24 hours	Attainment
Hydrogen sulfide (H_2S)	1 hour	Unclassified
Vinyl chloride[b]	24 hours	No designation
Visibility-reducing particles	8 hours (10:00 a.m.–6:00 p.m.)	Unclassified

Sources: EPA 2018 (federal); CARB 2018 (California)
Notes: O_3 = ozone; NO_2 = nitrogen dioxide; CO = carbon monoxide; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns.

[a] Partial nonattainment designation – Los Angeles County portion of air basin only for near-source monitors. Expected to remain in attainment based on current monitoring data.

[b] California Air Resources Board has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined.

[c] The area of route State Route 60 between San Bernardino and Riverside Counties is designated as a nonattainment area for NO_2. The Project site, however, is not located within this nonattainment area and is located in an attainment area for NO_2.

4.2.1.2 Pollutants and Effects

Criteria Air Pollutants

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. The federal and state standards have been set, with an adequate margin of safety, at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include O_3, NO_2, CO, SO_2, PM_{10}, $PM_{2.5}$, and lead. These pollutants, as well as toxic

air contaminants (TACs), are discussed in the following paragraphs.[1] In California, sulfates, vinyl chloride, hydrogen sulfide, and visibility-reducing particles are also regulated as criteria air pollutants.

Ozone. O_3 is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors. These precursors are mainly NO_x and volatile organic compounds (VOCs). The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric O_3) and at the Earth's surface in the troposphere (ground-level O_3).[2] The O_3 that EPA and CARB regulate as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed.

O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2016). These health problems are particularly acute in sensitive receptors such as the sick, older adults, and young children.

Nitrogen Dioxide. NO_2 is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_x plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_x is formed from fuel combustion under high temperature or pressure. In addition, NO_x is an important precursor to acid rain and may affect terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources, such as electric utility and industrial boilers.

NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2016).

Carbon Monoxide. CO is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels. CO is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November through February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent.

[1] The descriptions of each of the criteria air pollutants and associated health effects are based on EPA's Criteria Air Pollutants (EPA 2016) and CARB's Glossary of Air Pollutant Terms (CARB 2016).

[2] The troposphere is the layer of the Earth's atmosphere nearest to the surface of the Earth. The troposphere extends outward approximately 5 miles at the poles and 10 miles at the equator.

In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions.

Sulfur Dioxide. SO_2 is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary-source emissions of SO_2 and limits on the sulfur content of fuels.

SO_2 is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO_2 can injure lung tissue and reduce visibility and the level of sunlight. SO_2 can also yellow plant leaves and erode iron and steel.

Particulate Matter. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter. Coarse particulate matter (PM_{10}) consists of particulate matter that is 10 microns or less in diameter and is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Fine particulate matter ($PM_{2.5}$) consists of particulate matter that is 2.5 microns or less in diameter and is roughly 1/28 the diameter of a human hair. $PM_{2.5}$ results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_x), NO_x, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates, can cause lung damage directly or be absorbed into the blood stream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases, such as chlorides or ammonium into the lungs, also causing injury. PM_{10} tends to collect in the upper portion of the respiratory system, and $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility.

People with influenza, people with chronic respiratory and cardiovascular diseases, and older adults may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate matter. Children may experience a decline in lung function due to breathing in PM_{10} and $PM_{2.5}$ (EPA 2016).

Lead. Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline,

secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern.

Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and, in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead.

Volatile Organic Compounds. Hydrocarbons are organic gases that are formed from hydrogen and carbon and sometimes other elements. Hydrocarbons that contribute to formation of O_3 are referred to and regulated as VOCs (also referred to as reactive organic gases). Combustion engine exhaust, oil refineries, and fossil-fueled power plants are the sources of hydrocarbons. Other sources of hydrocarbons include evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint.

The primary health effects of VOCs result from the formation of O_3 and its related health effects. High levels of VOCs in the atmosphere can interfere with oxygen intake by reducing the amount of available oxygen through displacement. Carcinogenic forms of hydrocarbons, such as benzene, are considered TACs. There are no separate health standards for VOCs as a group.

Non-Criteria Pollutants

Toxic Air Contaminants. A substance is considered toxic if it has the potential to cause adverse health effects in humans, including increasing the risk of cancer upon exposure, or acute and/or chronic noncancer health effects. A toxic substance released into the air is considered a TAC. TACs are identified by federal and state agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hot spots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

Examples include certain aromatic and chlorinated hydrocarbons, certain metals, and asbestos. TACs are generated by a number of sources, including stationary sources such as dry cleaners, gas stations, combustion sources, and laboratories; mobile sources such as ~~automobiles~~ diesel trucks;[3] and area sources such as landfills. Adverse health effects associated with exposure to TACs may include carcinogenic (i.e., cancer-causing) and noncarcinogenic effects. Noncarcinogenic effects typically affect one or more target organ systems and may be experienced on either short-term (acute) or long-term (chronic) exposure to a given TAC.

Diesel Particulate Matter. Diesel particulate matter (DPM) is part of a complex mixture that makes up diesel exhaust. Diesel exhaust is composed of two phases, gas and particle, both of which contribute to health risks. More

[3] Light duty passenger cars are not considered a significant source of mobile source TAC emissions and there is no evidence that exposure to gasoline causes cancer in humans (Appendix C-1).

than 90% of DPM is less than 1 micrometer in diameter (about 1/70th the diameter of a human hair), and thus is a subset of $PM_{2.5}$ (CARB 2016). DPM is typically composed of carbon particles ("soot," also called black carbon, or BC) and numerous organic compounds, including over 40 known cancer-causing organic substances. Examples of these chemicals include polycyclic aromatic hydrocarbons, benzene, formaldehyde, acetaldehyde, acrolein, and 1,3-butadiene (CARB 2016). CARB classified "particulate emissions from diesel-fueled engines" (i.e., DPM; 17 CCR 93000) as a TAC in August 1998. DPM is emitted from a broad range of diesel engines: on-road diesel engines of trucks, buses, and cars and off-road diesel engines, including locomotives, marine vessels, and heavy-duty construction equipment, among others. Approximately 70% of all airborne cancer risk in California is associated with DPM (CARB 2009). To reduce the cancer risk associated with DPM, CARB adopted a diesel risk reduction plan in 2000 (CARB 2009). Because it is part of $PM_{2.5}$, DPM also contributes to the same noncancer health effects as $PM_{2.5}$ exposure. These effects include premature death; hospitalizations and emergency department visits for exacerbated chronic heart and lung disease, including asthma; increased respiratory symptoms; and decreased lung function in children. Several studies suggest that exposure to DPM may also facilitate development of new allergies (CARB 2016). Those most vulnerable to noncancer health effects are children whose lungs are still developing and older adults, who often have chronic health problems.

Odorous Compounds. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. Known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

4.2.2 Relevant Plans, Policies, and Ordinances

Regulatory oversight for air quality in the SCAB is maintained by the EPA at the federal level, CARB at the state level, and the SCAQMD at the local level. Applicable laws, regulations, and standards of these three agencies are described in the following subsections.

Federal

The federal Clean Air Act, passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The EPA is responsible for implementing most aspects of the Clean Air Act, including the setting of the NAAQS (federal standards) for major air pollutants, hazardous air pollutant (HAP) standards, approval of state attainment plans, motor vehicle emission standards, stationary source emission standards and permits, acid rain control measures, stratospheric O_3 protection, and enforcement provisions. Federal standards are established for criteria pollutants under the Clean Air Act, which are O_3, CO, NO_2, SO_2, PM_{10}, $PM_{2.5}$, and lead.

The federal standards describe acceptable air quality conditions designed to protect the health and welfare of the citizens of the nation. The federal standards (other than for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$, and those based on annual averages or arithmetic mean) are not to be exceeded more than once per year. Federal standards for O_3, NO_2, SO_2, PM_{10}, and $PM_{2.5}$ are based on statistical calculations over 1- to 3-year periods, depending on the pollutant. The Clean Air Act requires the EPA to reassess the federal standards at least every 5 years to determine whether

adopted standards are adequate to protect public health based on current scientific evidence. States with areas that exceed the federal standards must prepare a state implementation plan that demonstrates how those areas will attain the standards within mandated time frames.

The federal Clean Air Act delegates the regulation of air pollution control and the enforcement of the federal standards to the states. In California, the task of air quality management and regulation has been legislatively granted to CARB, with subsidiary responsibilities assigned to air quality management districts and air pollution control districts at the regional and county levels.

The 1977 federal Clean Air Act Amendments required the EPA to identify national emissions standards for HAPs to protect public health and welfare. HAPs include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard based on scientific studies of exposure to humans and other mammals. Under the 1990 federal Clean Air Act Amendments, which expanded the control program for HAPs, 189 substances and chemical families were identified as HAPs.

State

CARB, which became part of the California EPA in 1991, is responsible for ensuring implementation of the California Clean Air Act of 1988, responding to the federal Clean Air Act, and regulating emissions from motor vehicles and consumer products. CARB established the CAAQS (state standards), which are generally more restrictive than the federal standards. The state standards describe adverse conditions; that is, pollution levels must be below these standards before a basin can attain the standard. The state standards for O_3, CO, SO_2 (1 hour and 24 hours), NO_2, PM_{10}, $PM_{2.5}$, and visibility-reducing particles are values that are not to be exceeded. All others are not to be equaled or exceeded. The federal and state standards are presented in Table 4.2-3.

Table 4.2-3. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary[c,d]*	*Secondary[c,e]*
O_3	1 hour	0.09 ppm (180 μg/m³)	—	Same as Primary Standard[f]
	8 hours	0.070 ppm (137 μg/m³)	0.070 ppm (137 μg/m³)[f]	
NO_2[g]	1 hour	0.18 ppm (339 μg/m³)	0.100 ppm (188 μg/m³)	Same as Primary Standard
	Annual Arithmetic Mean	0.030 ppm (57 μg/m³)	0.053 ppm (100 μg/m³)	
CO	1 hour	20 ppm (23 mg/m³)	35 ppm (40 mg/m³)	None
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	
SO_2[h]	1 hour	0.25 ppm (655 μg/m³)	0.075 ppm (196 μg/m³)	—
	3 hours	—	—	0.5 ppm (1,300 μg/m³)
	24 hours	0.04 ppm (105 μg/m³)	0.14 ppm (for certain areas)[g]	—
	Annual	—	0.030 ppm (for certain areas)[g]	—

Table 4.2-3. Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary[c,d]*	*Secondary[c,e]*
PM_{10}[i]	24 hours	50 µg/m³	150 µg/m³	Same as Primary Standard
	Annual Arithmetic Mean	20 µg/m³	—	
$PM_{2.5}$[i]	24 hours	—	35 µg/m³	Same as Primary Standard
	Annual Arithmetic Mean	12 µg/m³	12.0 µg/m³	15.0 µg/m³
Lead[j,k]	30-day Average	1.5 µg/m³	—	—
	Calendar Quarter	—	1.5 µg/m³ (for certain areas)[k]	Same as Primary Standard
	Rolling 3-Month Average	—	0.15 µg/m³	
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m³)	—	—
Vinyl chloride[j]	24 hours	0.01 ppm (26 µg/m³)	—	—
Sulfates	24- hours	25 µg/m³	—	—
Visibility reducing particles	8 hour (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70%	—	—

Source: CARB 2019a.

Notes: O_3 = ozone; µg/m³ = micrograms per cubic meter; ppm = parts per million by volume; NO_2 = nitrogen dioxide; CO = carbon monoxide; mg/m³= milligrams per cubic meter; SO_2 = sulfur dioxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; PST = Pacific Standard Time.

a California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter—PM_{10}, $PM_{2.5}$, and visibility-reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

b National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

c Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

d National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

e National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

f On October 1, 2015, the primary and secondary NAAQS for O_3 were lowered from 0.075 ppm to 0.070 ppm

g To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 parts per billion (ppb). Note that the national 1-hour standard is in units of ppb. California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

h On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

[i] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 μg/m³ to 12.0 μg/m³. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 μg/m³, as was the annual secondary standard of 15 μg/m³. The existing 24-hour PM_{10} standards (primary and secondary) of 150 μg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[j] CARB has identified lead and vinyl chloride as toxic air contaminant (TACs) with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[k] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 μg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

The state Air Toxics Program was established in 1983 under AB 1807. The California TAC list identifies more than 700 pollutants, of which carcinogenic and noncarcinogenic toxicity criteria have been established for a subset of these pollutants pursuant to the California Health and Safety Code. In accordance with AB 2728, the state list includes the (federal) HAPs. The Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588) was enacted by the legislature to address public concern over the release of TACs into the atmosphere. AB 2588 law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hot spots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years. TAC emissions from individual facilities are quantified and prioritized. "High-priority" facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public in the form of notices and public meetings.

In 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce diesel emissions from both new and existing diesel-fueled vehicles and engines. Additional regulations apply to new trucks and diesel fuel, including the On-Road Heavy Duty Diesel Vehicle (In-Use) Regulation, the On-Road Heavy Duty (New) Vehicle Program, the In-Use Off-Road Diesel Vehicle Regulation, and the New Off-Road Compression-Ignition (Diesel) Engines and Equipment program. All of these regulations and programs have timetables by which manufacturers must comply and existing operators must upgrade their diesel-powered equipment. Several Airborne Toxic Control Measures would reduce diesel emissions, including In-Use Off-Road Diesel-Fueled Fleets (13 CCR 2449 et seq.) and In-Use On-Road Diesel-Fueled Vehicles (13 CCR 2025).

Local

South Coast Air Quality Management District

The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, state, and local air pollution control regulations in the SCAB, where the Project is located. The SCAQMD operates monitoring stations in the SCAB, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain state and federal ambient air quality standards in the SCAB. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

The ~~most recent adopted AQMP is the~~ 2016 AQMP (SCAQMD 2017a)~~, which~~ was adopted by the SCAQMD governing board on March 3, 2017. The 2016 AQMP is a regional blueprint for achieving air quality standards and healthful air. The 2016 AQMP represents a new approach, focusing on available, proven, and cost-effective alternatives to traditional strategies while seeking to achieve multiple goals in partnership with other entities promoting reductions in greenhouse gases and toxic risk, as well as efficiencies in energy use, transportation, and goods movement

(SCAQMD 2017a). Because mobile sources are the principal contributor to the SCAB's air quality challenges, the SCAQMD has been and will continue to be closely engaged with CARB and the EPA, who have primary responsibility for these sources. The 2016 AQMP recognizes the importance of working with other agencies to develop funding and other incentives that encourage the accelerated transition of vehicles, buildings, and industrial facilities to cleaner technologies in a manner that benefits not only air quality but also local businesses and the regional economy. These "win/win" scenarios are key to implementation of the 2016 AQMP with broad support from a wide range of stakeholders. The SCAQMD 2016 AQMP (SCAQMD 2017a) applies the Southern California Association of Governments' (SCAG) growth forecasts assumed in the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (SCAG 2016).

The 2022 AQMP was adopted by the SCAQMD Hearing Board on December 2, 2022 (SCAQMD 2022a) ~~and will subsequently be reviewed and approved by CARB and the EPA in Late 2022 or early 2023~~. CARB approved the 2022 AQMP on January 26, 2023, and EPA approved the 2022 AQMP on August 15, 2023 (effective September 14, 2023). The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NO_x technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), and incentives and addresses EPA's strengthened O_3 standard.

Potentially Applicable Rules

Emissions that would result from stationary and area sources during construction and operation under the Project may be subject to SCAQMD rules and regulations. The SCAQMD rules applicable to the Project may include the following:

Rule 201: **Permit to Construct.** This rule establishes an orderly procedure for the review of new and modified sources of air pollution through the issuance of permits. Rule 201 specifies that any facility installing nonexempt equipment that causes or controls the emissions of air pollutants must first obtain a permit to construct from SCAQMD (SCAQMD 2004a).

Rule 203: **Permit to Operate.** This rule requires any equipment that may cause the issuance of air contaminants, or the use of which may reduce or control the issuance of air contaminants, to obtain a written permit to operate, and shall be operated to the conditions specified in the permit to operate (SCAQMD 2004b).

Rule 401: **Visible Emissions.** This rule establishes the limit for visible emissions from stationary sources (SCAQMD 2001).

Rule 40: **Nuisance.** This rule prohibits the discharge of air pollutants from a facility that cause injury, detriment, nuisance, or annoyance to the public or damage to business or property (SCAQMD 1976).

Rule 40: **Fugitive Dust.** This rule requires fugitive dust sources to implement best available control measures for all sources to ensure all forms of visible particulate matter are prohibited from crossing any property line. SCAQMD Rule 403 is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (SCAQMD 2005).

Rule 431: **Sulfur Content of Liquid Fuel.** The purpose of this rule is to limit the sulfur content in diesel and other liquid fuels for the purpose of both reducing the formation of SO_x and particulates during combustion and enabling the use of add-on control devices for diesel-fueled internal combustion

engines. The rule applies to all refiners, importers, and other fuel suppliers, such as distributors, marketers, and retailers, as well as to users of diesel, low-sulfur diesel, and other liquid fuels for stationary-source applications in the district. The rule also affects diesel fuel supplied for mobile-source applications (SCAQMD 2000).

Rule 1113: **Architectural Coatings.** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories (SCAQMD 2016).

Rule 2202: **On-Road Motor Vehicle Mitigation Options.** Provides employers with a menu of options to reduce mobile source emissions generated from employee commutes, to comply with federal and state Clean Air Act requirements, Health & Safety Code Section 40458, and Section 182(d)(1)(B) of the federal Clean Air Act. This rule applies to any employer who employs 250 or more employees on a full or part-time basis (SCAQMD 2023b).

Rule 2305: **Warehouse Indirect Source Rule.** Owners and operators of warehouses greater than or equal to 100,000 square feet of indoor floor space in a single building are required to reduce emissions of NOx and PM (SCAQMD 2021a).

Regulation XIV: **Toxics and Other Non-Criteria Pollutants.** This regulation includes rules that regulate toxics and other non-criteria pollutants. It provides specifications for maximum individual cancer risk, cancer burden, and noncancer acute and chronic hazard index (HI) from new permit units, relocations, or modifications to existing permit units that emit TACs. The rules establish allowable risks for permit units requiring new permits pursuant to Rules 201 or 203 (SCAQMD 2017b).

March Joint Powers Authority General Plan

The Noise/Air Quality Element of the adopted March JPA General Plan includes goals and policies related to air quality (March JPA 1999) that would be applied to the Project. Consistency with these goals and policies is discussed in Section 4.10, Land Use and Planning. The following goals and policies from the March JPA General Plan would apply to the Project (March JPA 1999):

Goal 6: Reduce emissions associated with vehicle/engine use.

Policy 6.1: Reduce idling emissions by increasing traffic flow through synchronized traffic signals.

Policy 6.2: Work with Riverside Transit Authority to develop a local transit system and facilitate connections of the local transit system with regional transit systems.

Policy 6.3: Encourage diversion of peak hour truck traffic, whenever feasible, to off-peak periods to reduce roadway congestion and associated emissions.

Policy 6.4: Work with Caltrans and traffic engineers to insure that roadways and freeway on-ramps that are heavily utilized by trucks are designed to safely accommodate trucks.

Policy 6.5: Encourage trucks operating within March JPA Planning Area to maintain safety equipment and operate at safe speeds so as to reduce the potential for accidents which create congestion and related emissions.

Policy 6.6: Reduce vehicle emissions through improved parking design and management that provide for safe pedestrian access to and from various facilities.

Policy 6.8: Encourage the use of compressed natural gas, clean diesel and/or alternative fuels in engines.

Goal 8: Reduce air pollution emissions and impacts through siting and building design.

Policy 8.1: Support the use of low polluting construction materials and coatings.

Policy 8.3: Encourage the separation of sensitive receptors from potential carbon monoxide hotspots.

Goal 9: Reduce fugitive dust and particulate matter emissions.

Policy 9.1: Require all feasible fugitive dust reduction techniques to be utilized during construction activities.

Policy 9.3: Support land division design which minimizes grading and maintains the natural topography to the maximum extent feasible.

In November 2023, March JPA released a Draft Environmental Justice Element (March JPA 2023). The draft March JPA Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the unincorporated territory within the County of Riverside. March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. The following goals and policies related to air quality from the March JPA Draft Environmental Justice Element would apply to the Project (March JPA 2023) and are discussed in Section 4.10, Land Use and Planning:

HC 16.5 Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety.

HC 16.6 When developing and siting large scale logistics, warehouse and distribution projects, address the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.

HC 16.10 Plan for compact development projects in appropriate locations, including in existing communities and the clustering of affordable and mixed income housing therein, that make the most efficient use of land and concentrate complementary uses in close proximity to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.

HC 16.14 Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.

HC 16.15 Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

HC 16.16 Apply pollution control measures such as landscaping, vegetation, and green zones (in cooperation with the SCAQMD) and other materials, which trap particulate matter or control air pollution.

HC 16.18 Promote new development that emphasizes job creation and reduction in vehicle miles traveled in job-poor areas and does not otherwise contribute to onsite emissions in order to improve air quality.

HC 16.23 Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

HC 18.7 Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.

HC 18.9 Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.

a. Using design standards of the appropriate Specific Plan land use category.

b. Construction of structures in accordance with the requirements of March JPA's zoning, building, and other pertinent codes and regulations.

c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.

d. Use of drought tolerant landscaping that incorporates adequate drought-conscious irrigation systems.

e. Application of energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy.

f. Application of water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.

g. Encourage innovative and creative design concepts.

h. Encourage the provision of public art that enhances the community's identity, which may include elements of historical significance and creative use of children's art.

i. Include consistent and well-designed signage that is integrated with the building's architectural character.

j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.

k. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.

l. Mitigate noise, odor, lighting, pollution exposure and other impacts on surrounding properties.

m. Provide and maintain landscaping in open spaces and parking lots.

n. As feasible, maximize landscape coverage with emphasis on drought-tolerant landscaping.

o. Preserve, as feasible, natural features, such as unique natural terrain, arroyos, canyons, and other drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems.

p. Require, as feasible, that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements.

q. Design parking lots and structures to be functionally and visually integrated and connected.

r. As feasible, site building access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity where such pass-through areas include wayfinding signage, street trees, grade and lateral separation from roads, all with consideration given to adequate safety lighting, and landscape screening.

s. Encourage safe and frequent pedestrian crossings and ensure that sidewalks and other pedestrian walkways provide continuity between land uses essential to a functional lifestyle, and as needed such sidewalks and pedestrian walkways should provide sufficient lighting and signage to ensure public safety.

t. Encourage creation of a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.

u. Recognize open space, including hillsides, arroyos, riparian areas, and other natural features as amenities that add community identity, beauty, recreational opportunities, and monetary value to adjacent developed areas.

v. Manage wild land fire hazards in the design of development proposals located adjacent to natural open space.

Riverside County Good Neighbor Policy for Logistics and Warehouse/Distribution Uses:

In 2019, the Riverside County Board of Supervisors approved a Good Neighbor Policy to provide a framework for large scale e-commerce and warehouse facilities larger than 250,000 square feet (County of Riverside 2019). Although Riverside County does not have direct land use control within the March JPA jurisdiction, it is anticipated that in approximately 2025, Riverside County will assume full land use control over the March JPA planning area, due to the planned sunsetting/dissolution of the March Joint Powers Authority. The March JPA Draft Environmental Justice Element directs projects to address ~~Accordingly,~~ consistency with the County's Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. This provides an additional metric to determine if the Project's impacts

are significant and provides an appropriate set of policies that are intended to guide development within unincorporated Riverside County. The County's Policy is generally consistent with WRCOG's 2005 "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities", both of which are cited favorably by the Attorney General's "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act" dated September 2022 (AG 2022).

City of Riverside Good Neighbor Guidelines for Siting New and/or Modified Industrial Facilities:

On November 10, 2020, the Riverside City Council adopted Ordinance 7541, which added Chapter 19.435 to the City of Riverside Municipal Code (City of Riverside 2020a) implementing the City's Good Neighbor Guidelines for Siting New and/or Modified Industrial Facilities (City of Riverside 2020b). As the Project site is adjacent to the City of Riverside, the Project was designed to generally comply with the City's Good Neighbor Guidelines.

4.2.3 Project Design Features

The following Project Design Features (PDFs) havehas been incorporated into the Project and the impact analysis in Section 4.2.6 below. Although the PDF is already part of the Project, it will also be included as a separate condition of approval and included in the Mitigation Monitoring and Reporting Program (MMRP). March JPA will monitor compliance through the MMRP.

PDF-AQ-1 Offroad equipment used during construction shall meet CARB Tier 4 Final emission standards or better.

PDF-AQ-2 **Construction Budget.** To ensure construction activities occur within the assumptions utilized in the Air Quality Impact Analysis (AQIA) (Appendix C-1) and disclosed in the EIR, the following shall be implemented:

- During each Phase of Project construction, the operating hours of construction equipment on site shall not exceed the assumptions set forth in Table 5-2 of the AQIA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation. The construction contractor shall submit a construction equipment hours log to the March JPA every 2 weeks to ensure compliance.
- During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance. "Active disturbance" does not include moving of equipment from staging area(s) to grading areas.

PDF-AQ-3 **Future Site Plans.** All Specific Plan Area site plans shall include documentation confirming the site plan's environmental impacts do not exceed the impacts identified and disclosed in this EIR. Absent such documentation, additional environmental review shall be required.

PDF-AQ-14 **No Natural Gas Use.** Specific Plan Area development shall not utilize natural gas. In the event a future structure requires access to any available natural gas infrastructure, additional environmental review shall be required.

4.2.4 Thresholds of Significance

According to the March JPA 2022 California Environmental Quality Act (CEQA) Guidelines, a significant impact related to air quality would occur if the Project would (March JPA 2022):

AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.

AQ-2 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

A project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O_3 (see Table 4.2-4), which is a nonattainment pollutant, if that project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 4.2-4. These emission-based thresholds for O_3 precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly (see the previous discussion of O_3 and its sources), and the effects of an individual project's emissions of O_3 precursors (VOC and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

Table 4.2-4. South Coast Air Quality Management District Air Quality Significance Thresholds

Pollutant	Construction Regional Thresholds	Operation Regional Thresholds
Criteria Pollutants Mass Daily Thresholds (pounds per day)		
VOCs	75	55
NO_x	100	55
CO	550	550
SO_x	150	150
PM_{10}	150	150
$PM_{2.5}$	55	55
Lead[a]	3	3
TACs and Odor Thresholds		
TACs[b]	Maximum incremental cancer risk ≥10 in 1 million Chronic and acute hazard index ≥1.0 (project increment) Cancer burden >0.5 excess cancer cases (in areas ≥ 1 in 1 million)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality Standards for Criteria Pollutants[c]		
	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
NO_2 1-hour average	0.18 ppm (state)	
NO_2 annual arithmetic mean	0.030 ppm (state) and 0.0534 ppm (federal)	

Table 4.2-4. South Coast Air Quality Management District Air Quality Significance Thresholds

Pollutant	Construction Regional Thresholds	Operation Regional Thresholds
	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards:	
CO 1-hour average	20 ppm (state) and 35 ppm (federal)	
CO 8-hour average	9.0 ppm (state/federal)	
PM_{10} 24-hour average	10.4 μg/m³ (construction)[d]	
PM_{10} annual average	2.5 μg/m³ (operation)	
	1.0 μg/m³	
$PM_{2.5}$ 24-hour average	10.4 μg/m³ (construction)[d]	
	2.5 μg/m³ (operation)	

Source: SCAQMD 2019.
Notes: VOC = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; TAC = toxic air contaminant; SCAQMD = South Coast Air Quality Management District; NO_2 = nitrogen dioxide; ppm = parts per million; μg/m³ = micrograms per cubic meter.
[a] The phase-out of leaded gasoline started in 1976. Since gasoline no longer contains lead, the proposed Project is not anticipated to result in impacts related to lead; therefore, it is not discussed in this analysis.
[b] TACs include carcinogens and non-carcinogens.
[c] Ambient air quality standards for criteria pollutants based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.
[d] Ambient air quality threshold based on SCAQMD Rule 403.

Construction Localized Significance Threshold

In addition to the emission-based thresholds in Table 4.2-4, the SCAQMD also recommends evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of a project as a result of construction and operation activities. Such an evaluation is referred to as a localized significance threshold (LST) analysis.

Some people are especially sensitive to air pollution and are given special consideration when evaluating air quality impacts from projects. These groups of people include children, older adults, individuals with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. Structures that house these persons or places where they gather to exercise are defined as "sensitive receptors." These structures typically include residences, hotels, hospitals, and other facilities known to be locations where an individual can remain for 24 hours. Consistent with the LST methodology (SCAQMD 2008), the nearest land use where an individual could remain for 24 hours to the Project site (in this case, the nearest residential land use) was used to determine construction and operational air quality impacts for emissions of PM_{10} and $PM_{2.5}$, since PM_{10} and $PM_{2.5}$ thresholds are based on a 24-hour averaging time. Figure 4.2-1 illustrates the nearest modeled sensitive receptors.

For the proposed Project, the appropriate SRA for the LST analysis is the SCAQMD Metropolitan Riverside County (SRA 23). LSTs apply to CO, NO_x, PM_{10}, and $PM_{2.5}$. The SCAQMD produced look-up tables for projects less than or equal to 5 acres in size, but the look-up tables can be applied as a screening criterion for larger projects. Since total acreage disturbed for the Project is likely greater than 5 acres per day throughout the construction process, then the SCAQMD recommends dispersion modeling to be conducted to determine the actual pollutant concentrations for applicable LSTs in the air. In other words, the maximum daily on-site emissions as calculated in CalEEMod are modeled via air dispersion modeling to calculate the actual concentration in the air (e.g., parts per million or micrograms per cubic meter) in order to determine if any applicable thresholds are exceeded. In order to estimate localized pollutant concentrations resulting from Project construction, the SCAQMD-approved AERMOD dispersion model was utilized. The modeling approach utilized is discussed as follows:

Sources

It should be noted that in order to model worst-case conditions, the highest daily peak on-site emissions resulting from overlapping construction activity were modeled.

A ground level release height and a 1 meter (~3.28 feet) initial vertical dimension (sigma z) were utilized for fugitive emissions of PM_{10} and $PM_{2.5}$ consistent with SCAQMD's LST guidance.

In order to account for equipment exhaust emissions from NO_2, ~~and~~ CO, PM_{10}, and $PM_{2.5}$, a release height of 5.0 meters (approximately 16.40 feet) was utilized consistent with SCAQMD's LST guidance.

Meteorological Data and Model Options

In order to account for meteorological conditions at the Project site, meteorological data from the SCAQMD's Riverside Airport (KRAL) monitoring station was utilized, as this is the nearest station to the Project site for which meteorological data is available. Additionally, a receptor height of 2 meters and regulatory default options were utilized consistent with SCAQMD's LST guidance. The analysis conservatively assumed full conversion of NO_x emissions to NO_2.

Operational Localized Significance Threshold

Similar to construction, dispersion modeling was performed to evaluate potential impacts to sensitive receptors during operation. The LST analysis generally includes on-site sources (area, energy, mobile – are previously discussed in Section 5.4 of Appendix C-1). However, it should be noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. It should be noted that the longest on-site distance is approximately 2.0 miles. As such, a separate CalEEMod run for operational LSTs has been prepared which accounts for the 2.0-mile on-site travel distance. Outputs from the model run for operational LSTs are provided in ~~Section~~ Appendix 5.4 of Appendix C-1.

4.2.5 Approach and Methodology

Construction Emissions

In May 2022, the SCAQMD, in conjunction with the California Air Pollution Control Officers Association and other California air districts, released the latest version of CalEEMod (Version 2022.1). The 2022 Air Quality Impact Analysis included within the January 2023 Draft EIR utilized CalEEMod Version 2022.1.0.11. Since this time there have been 24 updates to the model. ~~Accordingly, the latest version of~~ For purposes of this recirculated section, CalEEMod Version 2022.1.1.20 was used ~~for the proposed Project~~ to determine construction and operational air quality emissions for the proposed Project.

For the purposes of this analysis, ~~C~~construction ~~is expected to~~ was assumed to commence in June 2023 and would last through October 2027. The construction schedule used in the analysis, shown in Table 4.2-5, represents a "worst-case" analysis scenario because emissions factors for construction decrease as time passes and the analysis year increases due to emissions regulations becoming more stringent.[4] The duration of construction activity and associated

[4] As shown in the CalEEMod User's Guide Version 2022.1, Section 4.3, OFFROAD Equipment, as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer, less-polluting equipment and new regulatory requirements (CAPCOA 2021).

equipment represents a reasonable approximation of the expected construction fleet, as required per the CEQA Guidelines. The duration of construction activity was based on the Project's anticipated 2028 opening year.

Table 4.2-5. Construction Schedule

Phase	Construction Activity	Start Date	End Date	Days
Phase 1	Mass Grading	6/1/2023	3/5/2024	199
	Blasting and Rock Handling	6/1/2023	3/5/2024	199
Phase 2	Remedial Grading	3/6/2024	6/6/2024	67
	Building Construction (including off site)	6/7/2024	10/15/2026	615
	Architectural Coating	8/1/2026	10/5/2027	307
	Paving	8/9/2027	10/5/2027	42

Source: Appendix C-1.

Based on information provided by the Project applicant, earthwork activities are expected to balance on site, and no import or export of soils would be required; however, approximately 7,608,500 cubic yards of dirt and 1,501,055 cubic yards of rock would be moved around the site. Construction emissions for construction worker vehicles traveling to and from the Project site, as well as vendor trips (construction materials delivered to the Project site), were estimated based on information from CalEEMod defaults. Site-specific construction fleet may vary due to specific Project needs at the time of construction. The associated construction equipment was provided by the Project applicant. Construction generates on-road vehicle emissions from vehicle usage for workers, hauling trucks, vendor trucks, and water trucks commuting to and from the site. A detailed summary of construction equipment assumptions by phase is provided at Table 4.2-6.

Table 4.2-6. Construction Equipment Assumptions

Phase	Construction Activity	Equipment	Amount	Hours Per Day	Horsepower	Load Factor
Phase 1	Mass Grading	Rubber Tired Dozers	8	8	670	0.40
		Scrapers	16	8	570	0.48
		Rubber Tired Dozers	1	8	425	0.40
		Off-Highway Trucks	3	8	500	0.38
		Tractors/Loaders/Backhoes	1	8	425	0.37
		Excavators	4	8	400	0.38
	Blasting and Rock Handling	Rubber Tired Dozers	2	8	670	0.40
		Tractors/Loaders/Backhoes	2	8	400	0.37
		Off-Highway Trucks	3	8	425	0.38
		Rubber Tired Dozers	1	8	600	0.40
		Bore/Drill Rigs	3	8	360	0.50
Phase 2	Remedial Grading	Rubber Tired Dozers	4	8	670	0.40
		Scrapers	8	8	570	0.48
		Rubber Tired Dozers	1	8	425	0.40
		Off-Highway Trucks	3	8	500	0.38
		Tractors/Loaders/Backhoes	1	8	425	0.37
		Excavators	2	8	400	0.38
	Building Construction	Cranes	2	8	231	0.29
		Crawler Tractors	3	8	212	0.43

Table 4.2-6. Construction Equipment Assumptions

Phase	Construction Activity	Equipment	Amount	Hours Per Day	Horsepower	Load Factor
		Forklifts	6	8	89	0.20
		Generator Sets	2	8	84	0.74
		Welders	2	8	46	0.45
	Architectural Coating	Air Compressors	2	8	78	0.48
	Paving	Pavers	4	8	130	0.42
		Paving Equipment	4	8	132	0.36
		Rollers	4	8	80	0.38

Source: Appendix C-1.

March JPA has established limits to the hours of construction. Section 9.10.030 of March JPA's Development Code provides that noise-generating construction activities can only occur between 7:00 a.m. and 7:00 p.m. As such, construction activities are permitted to occur up to 12 hours per day pursuant to the March JPA's Development Code. Under Section 9.10.140 of the March JPA Development Code, outdoor construction and grading activities, including the operation of any tools or equipment associated with construction, drilling, repair, alteration, grading/grubbing, or demolition work, within 500 feet of the property line of a residential use is further prohibited between 5:00 p.m. and 8:00 a.m. on Saturdays and at any time on Sunday or a federal holiday (March JPA 2016). However, the identified construction equipment for the proposed Project would not be used during every hour of the day. Consistent with industry standards and typical construction practices, each piece of equipment listed in Table 4.2-6 would operate up to a total of 8 hours per day, or approximately two-thirds of the period during which construction activities are allowed pursuant to the Development Code; most pieces of equipment would likely operate for fewer hours per day. ~~**PDF-AQ-1** ensures consistency with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Uses (see Section 4.2.3 for full text of all PDFs). **PDF-AQ-2** ensures that construction activities remain within the construction budget assumed within the air analysis included in Appendix C-1.~~

CO "Hot Spot" Analysis

An adverse CO concentration, known as a hot spot, would occur if an exceedance of the state 1-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm were to occur. At the time of the 1993 Handbook, the SCAB was designated nonattainment under the CAAQS and NAAQS for CO (SCAQMD 2003a).

CO hot spots are caused by vehicular emissions, primarily when vehicles are idling at congested intersections. In response, vehicle emissions standards have become increasingly stringent in the last 20 years. Currently, the allowable CO emissions standard in California is a maximum of 3.4 grams per mile for passenger cars (there are requirements for certain vehicles that are more stringent). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of increasingly sophisticated and efficient emissions control technologies, CO concentration in the SCAB is now designated as attainment (CARB 2019b).

Localized Significance Threshold Analysis

The SCAQMD also recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of a project as a result of construction and operation activities. Such an evaluation is referred to as an LST analysis. LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$. AERMOD was used to estimate concentrations of LST pollutants at the closest receptors to the project in accordance with SCAQMD Modeling Guidance for AERMOD. Both the

construction and operational LST analyses are based on the combination of maximum emissions that may occur with the worst-case meteorological conditions, which equates to conservatively high estimates that may never occur.

Construction Health Risk Assessment

For the purposes of analyzing health risks, a revised health risk assessment was prepared to evaluate the potential construction health-risk impacts to sensitive receptors associated with exposure of DPM emissions from construction of the proposed Project (Appendix C-2). The analysis was conducted in accordance with the guidelines in the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD 2003b). The EPA-approved dispersion model, American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD), was used to model the impacts of DPM emissions from construction activities. For purposes of this analysis, the Lakes AERMOD View (Version ~~10.2.1~~11.2.0) was used to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View incorporates EPA's ~~latest~~ AERMOD Version 21112.

For the construction health risk assessment, on-site construction activity was modeled as volume sources encompassing the construction area, and the vendor truck routes were modeled as adjacent volume sources. Vendor trucks were modeled using EPA's haul-route methodology for modeling of off-site truck movement. More specifically, the Haul Road Volume Source Calculator in Lakes AERMOD View was used to determine the release height parameters. Based on the EPA methodology, the Project's modeled sources would result in a release height of 3.49 meters, an initial lateral dimension of 4.0 meters, and an initial vertical dimension of 3.25 meters. The construction activity was modeled to represent typical weekday construction activity (Monday through Friday, 8 hours per day, 7:00 a.m. to 3:00 p.m.).

Meteorological data from the SCAQMD's Riverside Airport monitoring station was used to represent local weather conditions and prevailing winds (SCAQMD 2022b). The construction health risk assessment relied on the EPA Supplemental Guidance for Assessing Susceptibility from Early-Life Exposure to Carcinogens, EPA/630/R-003F. Discrete variants for daily breathing rates, exposure frequency, and exposure duration were obtained from relevant distribution profiles presented in the 2015 Office of Environmental Health Hazard Assessment's Guidelines (OEHHA 2015).

Construction related DPM emissions are expected to occur primarily as a function of heavy-duty construction equipment that would be operating on site within the Specific Plan Area.

Project construction includes construction of the extensions of Cactus Avenue, Brown Street, and Barton Street to connect the Specific Plan Area with the surrounding roadway network. Directly south of the Project site, the Project will install an aboveground 0.5-million-gallon prefabricated, bolted steel reclaimed water tank on a poured concrete slab next to an existing water tank on an already disturbed and graded site, along with trenching and paving to install a new reclaimed water line along Grove Community Drive to connect with Barton Street (see Figure 3-11, Construction Limits). DPM emissions related to the roadway extensions and tank/water line installation are included in the overall Project DPM emissions. Because this construction would be limited in scope, short-term and intermittent in nature, and cease upon completion, any resulting health impacts to nearby sensitive receptors would be negligible related to construction of the proposed Project and would not materially affect the determination of the maximum exposed individuals for purposes of this health risk assessment.

Operational Health Risk Assessment

A health risk assessment was prepared to evaluate the potential stationary- and mobile-source health-risk impacts to sensitive receptors associated with exposure to DPM as a result of diesel-powered on-site cargo handling equipment, emergency generators, and ~~diesel~~ trucks serving the Project (Appendix C-2~~1~~). The EPA-approved dispersion model, AERMOD, was used to model the impacts of DPM emissions from trucks traveling on study area roadways. The analysis also included on-site emissions from cargo handling equipment, emergency generators, and trucks, including ~~as well as~~ transport refrigeration units (TRUs). The analysis was conducted in accordance with the guidelines in the Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis (SCAQMD 2003b).[5] SCAQMD recommends using the EPA's AERMOD model. For purposes of this analysis, the Lakes AERMOD View (Version 11.2.0~~11.0.0~~) was used to calculate annual average particulate concentrations associated with site operations. Lakes AERMOD View incorporates EPA's ~~latest~~ AERMOD Version 21112. Meteorological data from the SCAQMD's Riverside Airport monitoring station was used to represent local weather conditions and prevailing winds (SCAQMD 2022b). The health risk assessment (Appendix C-2) included DPM emissions from operation of on-site cargo handling equipment, testing and maintenance of emergency generators, on-site truck idling, on-site truck traveling, and off-site truck traveling. Annual average PM_{10} emission factors were generated by running Emission Factors (EMFAC) 2021 in EMFAC Mode for vehicles in the Riverside County jurisdiction. Each roadway was modeled as a line source (made up of multiple adjacent volume sources). Discrete variants for daily breathing rates and exposure frequency were obtained from relevant distribution profiles presented in the 2015 Office of Environmental Health Hazard Assessment's Guidelines (OEHHA 2015) and the SCAQMD's Rule 1401 risk assessment procedures (SCAQMD 2017c).

The SCAQMD CEQA Air Quality Handbook states that emissions of TACs are considered significant if a health risk assessment shows an increased risk of greater than 10 in 1 million (SCAQMD 1993). Based on guidance from the SCAQMD in Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, for purposes of this analysis, 10 in 1 million was used as the cancer risk threshold for the proposed Project (SCAQMD 2003b). An evaluation of the potential noncarcinogenic effects of chronic exposures was also conducted.

Operational Emissions

Operation of the Project would result in criteria air pollutant emissions through area sources, energy use, ~~and~~ mobile sources, TRU sources, on-site equipment sources, and stationary sources.

Area Sources

CalEEMod estimates area source emissions for the following sources: architectural coating, consumer products, and landscape maintenance equipment. Detailed operational model outputs are presented in Appendix 5.3~~5.2~~ of Appendix C-1.

[5] SCAQMD/CARB does not publish guidance specific to emergency generators, but the same exposure quantification assumptions are used as for mobile sources. As noted in Appendix C-2, release parameters from CAPCOA were used.

Architectural Coating

Over a period of time, the buildings that are part of this Project will be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of Project maintenance. The emissions associated with architectural coatings were calculated using CalEEMod.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form O_3 and other photochemically reactive pollutants. The emissions associated with use of consumer products were calculated based on defaults provided within CalEEMod.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shedders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the Project. ~~It should be noted that as~~ On October 9, 2021, Governor Gavin Newsom signed AB 1346. The bill aims to ban the sale of new gasoline-powered equipment under 25 gross horsepower (known as small off-road engines [SOREs]) by 2024. For purposes of analysis, the emissions associated with landscape maintenance equipment were calculated based on assumptions provided in CalEEMod. It should be noted that the version of CalEEMod that was employed for this analysis does not account for AB 1346. As such, emissions associated with landscape maintenance equipment are conservative.

Energy Sources

The Project will not use natural gas (**PDF-AQ-1**). Criteria pollutant emissions are emitted through the generation of electricity. However, because electrical generating facilities for the Project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from off-site generation of electricity are generally excluded from the evaluation of significance.

This analysis assumes that no natural gas will be used as part of the Project. Electricity would be supplied to the Project by Southern California Edison. Electricity usage associated with the Project was calculated by CalEEMod using default parameters. ~~California's Energy Efficiency Standards for Residential and Nonresidential Buildings was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficient technologies and methods. Energy efficient buildings require less electricity. The 2019 version of Title 24 was adopted by the California Energy Commission and became effective on January 1, 2020. As such, the analysis herein assumed compliance with the newest Title 24 Standards, because the Project would be constructed after January 1, 2020. The 2022 version of Title 24 was adopted by the California Energy Commission and will become effective on January 1, 2023. As such, the 2022 version will apply at the time the Project is constructed but 2019 version was assumed. As such, this analysis is conservative. Pursuant to **PDF-AQ-4**, the Project is assumed to be all electric. As such, no natural gas is assumed to be used.~~

Mobile Sources

The Project related operational emissions derive primarily from vehicle trips generated by the Project. Trip characteristics available from the *West Campus Upper Plateau Traffic Analysis* (Appendix N) were utilized in this

analysis. The mobile-source emissions were calculated based on trip rates and trip lengths. Detailed operational model outputs are presented in Appendix C-1. Per the *West Campus Upper Plateau Traffic Analysis*, the Project is expected to generate a total of approximately of 35,314 trip-ends per day.

To determine emissions associated with the retail and open space land uses from all vehicle types (Light-Duty-Auto vehicles [LDA], Light-Duty Trucks [LDT1],[6] Light-Duty Trucks [LDT2],[7] Medium-Duty Trucks [MDV], Other Buses [OBUS],[8] Urban Buses [UBUS],[9] Motorcycle [MCY], School Buses [SBUS], and Motor Homes [MH], heavy duty trucks (2-axle/Light-Heavy-Duty Trucks [LHDT1[10] and LHDT2[11]], 3-axle/Medium-Heavy-Duty Trucks [MHDT], and 4+-axle/Heavy-Heavy-Duty Trucks [HHDT]), the CalEEMod default for vehicle type, trip purpose and one-way trip length of 16.6 miles was employed. To determine emissions from passenger car vehicles associated with the high-cube fulfillment center and business park uses, the CalEEMod defaults for trip purpose and a trip length of 20.27 miles was used.

The Project-specific passenger car fleet mix used in this analysis is based on a proportional split using the default CalEEMod percentages assigned to LDA, LDT1, LDT2, MDV, and MCY vehicle types. The truck types (LHDT1, LHDT2, MHDT, and HHDT) were broken down consistent with the Project's Traffic Analysis (Appendix N). To determine emissions from trucks for the proposed industrial uses, the analysis incorporated the SCAQMD recommended truck trip length of 14.2 miles for 2-axle and 3-axle (LHDT1, LHDT2, and MHDT) trucks and 40 miles for 4+-axle (HHDT) trucks and weighting the average trip lengths using traffic trip percentages taken from the West Campus Upper Plateau Traffic Study (SCAQMD 2021b). The trip length function for the high-cube fulfillment center and the business park uses has been conservatively calculated to 32.03 miles, with an assumption of 100% primary trips for the proposed industrial land uses. This trip length assumption is conservative because it is higher than the CalEEMod default trip length of 20.04 miles.

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust, inclusive of brake and tire wear particulates. The emissions estimate for travel on paved roads were calculated using CalEEMod.

TRUs

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. Therefore, for modeling purposes 188 trucks (376 two-way truck trips per day) have the potential to include TRUs. Since the ultimate location of the Cold Storage Warehousing is unknown at this time, it was estimated that Cold Storage usage could be allocated between Buildings B and C and the remaining Industrial parcel (proportional to square footage of each building relative to the total amount of cold storage allowed), as well as the total number of truck trips associated with cold storage usage. The analysis evaluates up to 500,000 square feet of cold storage; however, as a conservative measure, the analysis assumes that the cold storage use could be located in Building B, Building C, or the remaining Industrial parcel.

TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on CARB's OFFROAD Model version 2021 (OFFROAD2021). ~~EMFAC2021, developed by the CARB. EMFAC2021~~ OFFROAD2021 does not

6 Vehicles under the LDT1 category have a gross vehicle weight rating (GVWR) of less than 6,000 lbs. and equivalent test weight (ETW) of less than or equal to 3,750 lbs.

7 Vehicles under the LDT2 category have a GVWR of less than 6,000 lbs. and ETW between 3,751 lbs. and 5,750 lbs.

8 OBUS vehicle classes refers to all other buses except school buses and urban buses.

9 UBUS vehicle classes consist of natural gas buses, gasoline buses, and diesel buses.

10 Vehicles under the LHDT1 category have a GVWR of less than 8,501-10,000 lbs.

11 Vehicles under the LHDT2 category have a GVWR of less than 10,001-14,000 lbs.

provide emission rates per hour or mile as with the on-road emission model and only provides emission inventories. Emission results are produced in tons per day while all activity, fuel consumption and horsepower hours were reported at annual levels. The emission inventory is based on specific assumptions including the average horsepower rating of specific types of equipment and the hours of operation annually. These assumptions are not always consistent with assumptions used in the modeling of project level emissions. Therefore, the emissions inventory was converted into emission rates to accurately calculate emissions from TRU operation associated with project level details. This was accomplished by converting the annual horsepower hours to daily operational characteristics and converting the daily emission levels into hourly emission rates based on the total emission of each criteria pollutant by equipment type and the average daily hours of operation. Consistent with the methodology presented in Appendix F of CARB's *Proposed Amendments to the Airborne Toxic Control Measure for In-Use Diesel-Fueled TRU and TRU Generator Sets, and Facilities Where TRUs Operate* (CARB 2022), it was estimated that each TRU would spend approximately 3.3 hours per load at the facility and that the TRU engine would operate 62.5% of the time. Thus, it was estimated that for each two-way truck trip servicing the refrigerated warehouse portion of the Project, the TRU engine would operate for approximately 2.1 hours while on site and parked at the loading docks.

Cargo Handling Equipment

It is common for industrial buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. ~~PDF AQ-2 has been included in accordance with the County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Uses.~~ For this Project, it was conservatively assumed that a total of 18 diesel-powered tractors/loaders/backhoes[12] rated at 84 horsepower would operate 4 hours per day,[13] 365 days per year. On-site cargo handling equipment emissions were modeled in CalEEMod assuming average tier equipment (i.e., the fleet average engine tier for the Project's opening year).

Stationary Sources

The proposed Project was conservatively assumed to include installation of a 300-horsepower diesel-powered generator at each industrial building, for a total of 19 emergency generators. Each generator was estimated to operate for up to 1 hour per day, 1 day per week, for up to 50 hours per year for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency generators were calculated using CalEEMod assuming average tier generators.

4.2.6 Impacts Analysis

Threshold AQ-1. Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Specific Plan Area (Campus Development, Park, and Infrastructure Improvements)

The Specific Plan area is located within the SCAB under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. Construction and operation

[12] Based on SCAQMD's April 2021 Second Draft Report for Rule 2305, it is estimated that warehouses operate an average of 3.6 yard trucks per million square feet of warehouse space (SCAQMD 2021).

[13] Based on Table II-3, Port and Rail Cargo Handling Equipment Demographics by Type, from CARB's Technology Assessment: Mobile Cargo Handling Equipment document, a single piece of equipment could operate up to 2 hours per day (Total Average Annual Activity divided by Total Number Pieces of Equipment) (CARB 2015). As such, the analysis conservatively assumes that the tractor/loader/backhoe would operate up to 4 hours per day.

of the Specific Plan Area may result in emissions of short- and long-term criteria air pollutants in conflict with the SCAQMD AQMPs.

The SCAQMD has established criteria for determining consistency with an AQMP in Chapter 12, Sections 12.2 and 12.3 of the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993):

- **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.
- **Consistency Criterion No. 2**: The proposed project will not exceed the assumptions in the AQMP or increments based on the year of project build-out phase.

Consistency Criterion No. 1

The violations that Consistency Criterion No. 1 refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations would occur if regional or localized significance thresholds were exceeded.

Construction Impacts – Consistency Criterion 1

As evaluated in Thresholds AQ-2 and AQ-3, the Project's regional and localized construction-source emissions would not exceed applicable regional significance threshold and LST thresholds after implementation of **Mitigation Measure (MM) AQ-1** through **MM-AQ-4**. As such, a less than significant impact is expected.

Operational Impacts – Consistency Criterion 1

The Specific Plan buildout would not exceed the applicable LSTs for operational activity as evaluated under Threshold AQ-3. However, the Specific Plan's operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NO_x, CO, and PM_{10}, and $PM_{2.5}$ emissions. **MM-AQ-2** **MM-AQ-5** through **MM-AQ-27** **MM-AQ-15** are designed to reduce Project operational-source VOCs, NO_x, CO, and PM_{10}, and $PM_{2.5}$ emissions. However, even with the quantifiable emissions reductions associated with application of MM-AQ-5 through MM-AQ-27, Project operational-source emissions impacts would be significant and unavoidable. As explained in Threshold AQ-3, reductions were only quantified for **MM-AQ-8, MM-AQ-14, MM-AQ-18,** and **MM-AQ-24**. The remaining mitigation measures would further reduce emissions but could not be quantified. Therefore, actual operational emissions will be lower than those presented in this analysis. as there is no way to meaningfully quantify these reductions in CalEEMod, no numeric emissions credit has been taken in the analysis. As such, even with application of **MM-AQ-2** **MM-AQ-5** through **MM-AQ-27**MM-AQ-15, Project operational-source emissions impacts would be significant and unavoidable. As such Therefore, the Project has the potential to result in a significant impact with respect to this criterion and the Project would have the potential to conflict with the AQMP according to this criterion.

Conclusion – Consistency Criterion 1

On the basis of the preceding discussion, the Specific Plan is determined to be inconsistent with the first criterion.

Consistency Criterion No. 2

SCAQMD's 2016 AQMP notes 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law (SCAQMD 2022a2017a). Growth projections from local

general plans adopted by ~~cities~~ jurisdictions in the SCAQMD are provided to SCAG, which develops regional growth forecasts that are then used to develop future air quality forecasts for the AQMP. Development consistent with the SCAG RTP/SCS growth projections for the March JPA General Plan is considered to be consistent with the AQMP.

Construction Impacts – Consistency Criterion 2

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. Construction emissions are not relevant to the AQMP assumptions under this criterion.

Operational Impacts – Consistency Criterion 2

Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space (Figure 3-2). The March JPA General Plan includes warehousing in the definition of Business Park uses (March JPA 1999). Moreover, wholesale, storage, and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code (March JPA 2016). Thus, the Project designates more land for non-development uses, does not introduce new designated uses, and would not exceed the growth projections for the March JPA General Plan utilized in the 2022 AQMP. Therefore, the Project would be consistent with the second criterion.

~~The March JPA General Plan land use designations were established to identify the land use, describe the type of development expected, and identify the allowable development intensity. The March JPA General Plan land use designation for the Specific Plan area is Business Park, Industrial, and Park/Recreation/Open Space. The Business Park designation includes administrative, financial, commercial service, governmental, and community support services; research and development centers; light manufacturing; vocational education and training facilities; business and trades schools; and emergency services. Business Park areas are generally served by arterial roadways, providing automobile and transit access. These areas are characterized as major employment concentrations. Development in this category, except for warehousing, is generally within a campus like setting or cluster development pattern. Outdoor storage as a primary use is prohibited. The Industrial land use designation allows bio medical waste treatment facilities, light and medium manufacturing, newspaper publishing plants, research and development, public storage, and warehouses. The Park/Recreation/Open Space designation includes all passive and active park or recreation areas whether private or public in the Planning Area. Active recreation activities include outdoor athletic fields and public parklands. Passive activities include natural preserves with trails, along with designated arid natural open space areas. The Park/Recreation/Open Space uses, as defined in the Specific Plan, may also include civic uses such as police and fire substations.~~

~~The proposed Project (as shown on Figure 3-5, Site Plan) was analyzed in Appendix C-1 as consisting of the following uses:~~

- ~~Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use~~
- ~~Building C – 587,000 SF of high-cube fulfillment center warehouse use~~
- ~~Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use~~
- ~~Industrial Area – 500,000 SF of high-cube cold storage warehouse use~~
- ~~Business Park Area – 1,280,403 SF of business park use~~

- ~~Mixed Use Area – 160,921 SF of retail use (25%)~~
- ~~Mixed Use Area – 482,765 SF of business park use (75%)~~
- ~~60.28 acre park (with Active and Passive uses)~~
- ~~17.72 acres of Open Space use~~
- ~~The proposed Project also includes approximately 445.43 acre Conservation Easement~~

~~Portions of the proposed land use plan are not consistent with the current General Plan land use designation. As such, the Project proposes a General Plan amendment and the Specific Plan which will modify the land use designations and zoning. At the General Pan level, the application includes: 1) a significant increase in acreage of the overall Parks/Recreation/Open Space land use designation; 2) elimination of the Business Park and Industrial General land use designations; and 3) replacement of a portion of the Business Park land use designation with a lesser amount of Specific Plan land use designation.~~

Conclusion – Consistency Criterion 2

Since the Project would not exceed the growth projections for the March JPA General Plan utilized in the 2022 AQMP, the Project would be consistent with the second criterion. ~~Portions of the Specific Plan area are not consistent with the current land use designation. As such, the Project proposes General Plan amendments and the Specific Plan which will modify the land use designations and zoning. As the Specific Plan buildout would result in VOC, NOX, CO, and PM_{10} emission exceedances, the Specific Plan would result in significant and unavoidable impacts and is therefore determined to be inconsistent with the second criterion.~~

Threshold AQ-1 Conclusion

Even with application of ~~MM-AQ-2~~MM-AQ-5 through MM-AQ-27~~MM-AQ-15~~, Specific Plan operational-source emissions would exceed SCAQMD standards for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, and Project impacts would be significant and unavoidable. As such, the Specific Plan has the potential to result in a significant impact with respect to Consistency Criterion 1 and the Specific Plan would have the potential to conflict with the AQMP according to this criterion. Since the Project would not exceed the growth projections for the March JPA General Plan utilized in the 2022 AQMP, the Project would be consistent with Consistency Criterion 2. ~~As the Specific Plan operations would result in VOC, NOX, CO, and PM_{10} emission exceedances, the Specific Plan would result in significant and unavoidable impacts and is therefore determined to be inconsistent with the Consistency Criterion 2. As such,~~ Overall, the Specific Plan would have a **significant and unavoidable** impact regarding conflicting with or obstructing implementation of the applicable air quality plan.

Conservation Easement

Under the Project, a Conservation Easement would be established consistent with the terms of the CBD Settlement Agreement (Appendix S). No construction activities would occur within the Conservation Easement, and no change to existing conditions would occur. As such, **no impacts** with respect to air quality would occur with the establishment of the Conservation Easement.

Threshold AQ-2. Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?

Specific Plan Area (Campus Development, Park, and Infrastructure Improvements)

Construction Impacts

The estimated maximum daily construction emissions without mitigation are summarized in Table 4.2-7.

Table 4.2-7. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - Unmitigated

Year	VOC	NOx	CO	SOx	PM_{10}	$PM_{2.5}$
	pounds per day					
2023	38.64	413.38	268.42	0.95	71.41	30.91
2024	38.09	394.09	259.93	0.92	41.65	24.20
2025	12.39	57.39	180.95	0.14	29.44	8.11
2026	97.09	66.01	205.46	0.19	35.97	9.75
2027	99.25	27.93	64.77	0.10	7.99	2.58
Maximum	*99.25*	*413.38*	*268.42*	*0.95*	*71.41*	*30.91*
SCAQMD Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Threshold Exceeded?	Yes	Yes	No	No	No	No

Source: Appendix C-1.
Notes: VOC = volatile organic compound; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District.

~~Table 4.2-7 Estimated Maximum Daily Construction Criteria Air Pollutant Emissions~~

~~Year~~	~~VOC~~	~~NOx~~	~~CO~~	~~SOx~~	~~PM_{10}~~	~~$PM_{2.5}$~~
	~~*pounds per day*~~					
~~2023~~	~~9.74~~	~~56.06~~	~~477.51~~	~~0.96~~	~~56.33~~	~~19.16~~
~~2024~~	~~14.90~~	~~55.65~~	~~474.45~~	~~0.96~~	~~56.33~~	~~19.16~~
~~2025~~	~~9.37~~	~~26.52~~	~~187.48~~	~~0.13~~	~~2.46~~	~~0.52~~
~~2026~~	~~168.70~~	~~32.96~~	~~211.25~~	~~0.17~~	~~3.18~~	~~0.73~~
~~2027~~	~~172.51~~	~~10.84~~	~~68.72~~	~~0.10~~	~~0.88~~	~~0.33~~
~~*Maximum*~~	~~*172.51*~~	~~*56.06*~~	~~*477.51*~~	~~*0.96*~~	~~*56.33*~~	~~*19.16*~~
~~*SCAQMD Threshold*~~	~~*75*~~	~~*100*~~	~~*550*~~	~~*150*~~	~~*150*~~	~~*55*~~
~~Threshold Exceeded?~~	~~Yes~~	~~No~~	~~No~~	~~No~~	~~No~~	~~No~~

~~Source:~~ Appendix C-1.
~~Notes:~~ VOC = volatile organic compound; NOx = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM10 = particulate matter with an aerodynamic diameter equal to or less than 10 microns; PM2.5 = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District.
Emissions include application of ~~PDF-AQ-1~~, Tier 4 Final off-road equipment.

The Specific Plan Area's construction emissions would exceed the VOC and NO_x SCAQMD significance thresholds; thus, the Specific Plan's unmitigated impacts would be potentially significant and would therefore, per SCAQMD criteria, be cumulatively potentially significant and mitigation is required. Implementation of ~~mitigation measure~~

MM-AQ-1 (Tier 4 Final Construction Equipment) and **MM-AQ-4** ("Super-Compliant" Architectural Coatings) would reduce emissions of VOC and NO_x below levels of significance. **MM-AQ-2** (Construction Budget) requires the Project to ensure construction activities occur within the assumptions utilized in Appendix C-1. While **MM-AQ-3** (Construction Best Practices) would reduce construction-source emissions, the resulting emission reductions are not quantifiable in CalEEMod, and as such, reductions were not quantified and are therefore not reflected in the analysis. As such, impacts would be **less than significant with mitigation incorporated** as shown in Section 4.2.8.

Operational Impacts

CalEEMod uses summer and winter EMFAC2021 emission factors to derive vehicle emissions associated with operational activities, which vary by season. As such, peak operational activities for summer and winter scenarios are presented in Table 4.2-8. Detailed operational model outputs are presented in Appendix C-1.

Table 4.2-8. Summary of Project Operational Emissions - Unmitigated

Source	Emissions (pounds per day)					
	VOC	*NO_X*	*CO*	*SO_X*	*PM_{10}*	*$PM_{2.5}$*
Summer						
Mobile Source	174.00	308.00	2,148.00	6.90	577.00	151.00
Area Source	158.00	1.82	217.00	0.01	0.39	0.29
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment	0.85	8.63	17.20	0.02	0.24	0.22
Stationary Source	18.70	52.30	47.70	0.09	2.75	2.75
TRU Source	55.30	58.03	6.68	0.00	1.89	1.74
Total Maximum Daily Emissions	**406.85**	**428.78**	**2,436.58**	**7.02**	**582.27**	**156.00**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Winter						
Mobile Source	166.00	328.00	1,762.00	6.52	577.00	151.00
Area Source	122.00	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment	0.85	8.63	17.20	0.02	0.24	0.22
Stationary Source	18.70	52.30	47.70	0.09	2.75	2.75
TRU Source	55.30	58.03	6.68	0.00	1.89	1.74
Total Maximum Daily Emissions	**362.85**	**446.96**	**1,833.58**	**6.63**	**581.88**	**155.71**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Source: Appendix C-1.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District.

Table 4.2-8. Summary of Project Operational Emissions

Source	Emissions (pounds per day)					
	VOC	*NO_x*	*CO*	*SO_x*	*PM_{10}*	*$PM_{2.5}$*
Summer						
Mobile Source	174.00	308.00	2,148.00	6.90	233.00	46.30
Area Source	158.00	1.82	217.00	0.01	0.29	0.39
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
TRU Source	13.62	14.91	1.62	0.00	0.64	0.58
Total Maximum Daily Emissions	**345.62**	**324.73**	**2,366.62**	**6.91**	**233.93**	**47.27**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**
Winter						
Mobile Source	332.00	310.00	2,364.00	6.91	233.00	46.70
Area Source	122.00	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
TRU Source	13.62	14.91	1.62	0.00	0.64	0.58
Total Maximum Daily Emissions	**467.62**	**324.91**	**2,365.62**	**6.91**	**233.64**	**47.28**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**No**

Source: Appendix C 1.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District. Emissions include application of **PDF-AQ-4**, all electric cargo handling equipment, and no natural gas would be used on site.

As shown in Table 4.2-8, the Specific Plan Area's daily regional emissions from operations would exceed the thresholds of significance for emissions of VOCs, NO_X, CO, and PM_{10}, and $PM_{2.5}$. Therefore, a potentially significant impact would occur and would, therefore, per SCAQMD criteria, be cumulatively potentially significant and mitigation is required. **MM-AQ-5** through **MM-AQ-27** would reduce Project operational-source emissions. CalEEMod can quantify **MM-AQ-8** (TRU Electrical Hookups), **MM-AQ-14** (Electric/Battery-Operated Landscaping Equipment), **MM-AQ-18** (Electric On-Site Cargo Handling Equipment),[14] and **MM-AQ-24** (Emergency Generators).[15] While the remaining operational mitigation measures would reduce Project operational-source emissions, the resulting emission reductions are not quantifiable in CalEEMod, and as such, reductions were not quantified and are therefore not reflected in the analysis. **MM-AQ-2** through **MM-AQ-15** (on-site idling restriction; clean truck funding education; passive heating and cooling; electrical outlets for landscaping equipment; electric landscape equipment; electric cargo-handling equipment; clean trucks; employee commuting; SmartWay Trucks; employee training; on-site circulation signage; and truck charging) are designed to reduce Specific Plan operational source VOCs, NO_X, CO, and PM_{10} emissions. There is no way to meaningfully quantify these reductions in CalEEMod, and therefore no numeric emissions credit has been taken in the analysis.

[14] **MM-AQ-18** requires the Project building occupants to utilize either electric, hydrogen-fuel cell, or compressed natural gas equipment. Tier 4 diesel-powered yard hostlers can only be used if electric equipment is technically infeasible. Modeling Tier 4 equipment for the mitigated scenario conservatively understates the emissions reductions under **MM-AQ-18** to provide the "worst case scenario."

[15] **MM-AQ-24** prohibits the use of diesel-powered back-up generators, unless absolutely necessary, and then only Tier 4 Final or better. Modeling Tier 4 generators for the mitigated scenario conservatively understates the emissions reductions under **MM-AQ-24** to provide the "worst case scenario."

As shown in Section 4.2.8, after accounting for ~~MM-AQ-8, MM-AQ-14, MM-AQ-18~~, and ~~MM-AQ-24~~, Project operational emissions would still exceed SCAQMD thresholds for emissions of VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$. As noted above, these calculations do not account for the emission reductions that would result from all of the remaining mitigation measures as they are not quantifiable in CalEEMod. Thus, these figures represent a very conservative estimate. As such, even with application of ~~MM-AQ-2~~ MM-AQ-5 through ~~MM-AQ-27~~~~MM-AQ-15~~, Specific Plan operational-source emissions impacts would be **significant and unavoidable**.

Conservation Easement

Under the Project, a Conservation Easement would be established consistent with the terms of the CBD Settlement Agreement (Appendix S). No construction activities would occur within the Conservation Easement, and no change to existing conditions would occur. As such, **no impacts** with respect to air quality would occur with the establishment of the Conservation Easement.

Threshold AQ-3. Would the Project expose sensitive receptors to substantial pollutant concentrations?

Specific Plan Area (Campus Development, Park, Infrastructure Improvements)

The potential impact of Specific Plan Area-generated air pollutant emissions on sensitive receptors has also been considered. Sensitive receptors can include uses such as long-term healthcare facilities, rehabilitation centers, and retirement homes. Residences, schools, playgrounds, childcare centers, and athletic facilities can also be considered sensitive receptors. Figure 4.2-1 illustrates the nearest modeled sensitive receptors.

Localized Significance Thresholds Analysis

The SCAQMD also recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of a project as a result of construction and operation activities. Such an evaluation is referred to as an LST analysis. LSTs apply to CO, NO_2, PM_{10}, and $PM_{2.5}$.

Construction Localized Significance Threshold Impacts

As shown in Table 4.2-9, the on-site construction emissions for NO_2, CO, PM_{10}, and $PM_{2.5}$ were compared to the respective LSTs. Outputs from the model runs for construction LSTs are provided in Appendix C-1.

Table 4.2-9. Localized Significance Summary – Construction - Unmitigated

	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
Peak Construction	*1-Hour*	*8-Hour*	*1-Hour*	*24-Hours*	*24-Hours*
Peak Day Localized Emissions	0.04	0.01	3.38E-02	1.39	0.60
Background Concentration[a]	2.1	1.8	0.066	—	—
Total Concentration	**2.14**	**1.81**	**0.10**	**1.39**	**0.60**
SCAQMD Localized Significance Threshold	*20*	*9*	*0.18*	*10.4*	*10.4*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

Source: Appendix C-1.
Notes: NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; SCAQMD = South Coast Air Quality Management District.

PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m3. All others are expressed in ppm.
[a] Highest concentration from the last three years of available data.

~~Table 4.2-9. Localized Significance Summary – Construction~~

~~Peak Construction~~	~~CO~~		~~NO_2~~	~~PM_{10}~~	~~$PM_{2.5}$~~
	~~*Averaging Time*~~				
	~~*1 Hour*~~	~~*8 Hour*~~	~~*1 Hour*~~	~~*24 Hours*~~	~~*24 Hours*~~
~~Peak Day Localized Emissions~~	~~0.06~~	~~0.02~~	~~0.004~~	~~1.68~~	~~0.39~~
~~Background Concentration[a]~~	~~0.143~~	~~0.115~~	~~0.066~~	~~—~~	~~—~~
~~Total Concentration~~	~~0.21~~	~~0.14~~	~~0.07~~	~~1.68~~	~~0.39~~
~~*SCAQMD Localized Significance Threshold*~~	~~*20*~~	~~*9*~~	~~*0.18*~~	~~*10.4*~~	~~*10.4*~~
~~Threshold Exceeded?~~	~~No~~	~~No~~	~~No~~	~~No~~	~~No~~

~~Source: Appendix C-1.~~
~~Notes: NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; SCAQMD = South Coast Air Quality Management District.~~
~~PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m3. All others are expressed in ppm.~~
~~Includes application of **PDF-AQ-1**, Tier 4 Final off-road equipment.~~
~~[a] Highest concentration from the last three years of available data.~~

Results of the LST analysis indicate that the Specific Plan buildout would not exceed the SCAQMD localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during Specific Plan construction, and impacts would be **less than significant,** and no mitigation is required. For informational purposes, Section 4.2.8 provides the mitigated construction localized impacts with implementation of **MM-AQ-1** (Tier 4 Final Construction Equipment). The use of Tier 4 construction equipment under the mitigated scenario would reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions but result in a potential increase in CO emissions. This is attributable to some emission control technologies, such as exhaust gas recirculation, that reduce NO_X emissions while increasing CO emissions. However, CO emissions under the mitigated scenario would remain below the applicable SCAQMD significance threshold. Detailed mitigated construction model outputs are presented in Appendix C-1.

Operational LST Impacts

The LST analysis generally includes on-site sources (area, energy, operational equipment, stationary, TRU, and mobile – are previously discussed in Appendix C-1). However, it should be noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. As such, in an effort to establish a maximum potential impact scenario for analytic purposes, the emissions shown in Table 4.2-10 represent all on-site Specific Plan-related stationary (area) sources and 5% of the Specific Plan-related mobile sources. Considering that the minimum trip length used in CalEEMod for the Specific Plan is approximately 16.6 miles for passenger cars and a maximum of 32.03 miles for all trucks, 5% of this total would represent an on-site travel distance of approximately 0.8 mile/4,382 feet for passenger cars and 1.7 miles/8,976 feet for trucks. It should be noted that the longest on-site distance is roughly 2.0 miles for both trucks and passenger cars. As such, the 2-mile assumption is conservative and would tend to overstate the actual impact because it is not likely that a passenger car would drive 0.8 mile on the site or that a truck would drive 1.7 miles on the site.

Table 4.2-10. Localized Significance Summary – Operation - Unmitigated

Peak Construction	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	*8-Hour*	*1-Hour*	*24-Hours*	*24-Hours*
Peak Day Localized Emissions	4.56E-02	3.74E-02	7.34E-03	2.40	0.76
Background Concentration[a]	2.1	1.8	0.066	—	—
Total Concentration	**2.15**	**1.84**	**0.07**	**2.40**	**0.76**
SCAQMD Localized Significance Threshold	*20*	*9*	*0.18*	*2.5*	*2.5*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

Source: Appendix C-1.
Notes: NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; SCAQMD = South Coast Air Quality Management District.
PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m3. All others are expressed in ppm.
[a] Highest concentration from the last three years of available data.

~~Table 4.2-10. Localized Significance Summary – Operation~~

~~Peak Construction~~	~~CO~~		~~NO_2~~	~~PM_{10}~~	~~$PM_{2.5}$~~
	~~*Averaging Time*~~				
	~~*1 Hour*~~	~~*8 Hour*~~	~~*1 Hour*~~	~~*24 Hours*~~	~~*24 Hours*~~
~~Peak Day Localized Emissions~~	~~0.04~~	~~0.03~~	~~0.003~~	~~0.91~~	~~0.21~~
~~Background Concentration[a]~~	~~0.143~~	~~0.115~~	~~0.066~~	~~—~~	~~—~~
~~**Total Concentration**~~	~~**0.18**~~	~~**0.15**~~	~~**0.07**~~	~~**0.91**~~	~~**0.21**~~
~~*SCAQMD Localized Significance Threshold*~~	~~*20*~~	~~*9*~~	~~*0.18*~~	~~*2.5*~~	~~*2.5*~~
~~**Threshold Exceeded?**~~	~~**No**~~	~~**No**~~	~~**No**~~	~~**No**~~	~~**No**~~

~~**Source**: Appendix C-1.~~
~~**Notes:** NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; SCAQMD = South Coast Air Quality Management District.~~
~~PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m3. All others are expressed in ppm.~~
~~Includes application of **PDF-AQ-2**, all-electric cargo handling equipment.~~
~~[a] Highest concentration from the last three years of available data.~~

Results of the LST analysis indicate that the Specific Plan Area would not exceed the SCAQMD localized significance thresholds during operational activities; impacts would be **less than significant**, and no mitigation is required. For informational purposes, Section 4.2.8 provides the mitigated operational localized impacts with implementation of **MM-AQ-8** (TRU Electrical Hookups), **MM-AQ-14** (Electric/Battery-Operated Landscaping Equipment), **MM-AQ-18** (Electric On-Site Cargo Handling Equipment), and **MM-AQ-24** (Emergency Generators).

CO Hot Spot Analysis

The Specific Plan Area would not result in potentially adverse CO concentrations, or "hot spots." Further, detailed modeling of Specific Plan CO hot spots is not needed to reach this conclusion. An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the state 1-hour standard of 20 ppm or the 8-hour standard of 9 ppm were to occur. At the time of the SCAQMD's CEQA Air Quality Handbook (1993), the SCAB was designated nonattainment under the CAAQS and NAAQS for CO (SCAQMD 1993). The determination of a potential CO hot spot is focused on the mobile-source vehicular activity that would occur at intersections in the Specific Plan Area.

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO hot spot analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods (SCAQMD 2003a). This hot spot analysis did not predict any violation of CO standards, as shown in Table 4.2-11.

Table 4.2-11. Carbon Monoxide Model Results

Intersection Location	Carbon Monoxide Concentrations (parts per million)		
	Morning 1-Hour	*Afternoon 1-Hour*	*8-Hour*
Wilshire Boulevard/Veteran Avenue	4.6	3.5	3.7
Sunset Boulevard/Highland Avenue	4	4.5	3.5
La Cienega Boulevard/Century Boulevard	3.7	3.1	5.2
Long Beach Boulevard/Imperial Highway	3	3.1	8.4

Source: SCAQMD 2003a, Appendix V: Modeling and Attainment Demonstrations
Note: Federal 1-hour standard is 35 parts per million and the deferral 8-hour standard is 9 parts per million.

Based on the SCAQMD's 2003 AQMP (SCAQMD 2003a) and the 1992 Federal Attainment Plan for Carbon Monoxide, peak CO concentrations in the SCAB were a result of unusual meteorological and topographical conditions, and not a result of traffic volumes or congestion at a particular intersection. As evidence of this, for example, 8.4 ppm 8-hour CO concentration measured at the Long Beach Boulevard and Imperial Highway intersection (highest CO-generating intersection within the hot spot analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.4 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a hot spot, would occur if an exceedance of the state 1-hour standard of 20 ppm or the 8-hour standard of 9 ppm were to occur.

The ambient 1-hour and 8-hour CO concentration within the Project study area were estimated to be 1.9 ppm and 1.4 ppm, respectively (data from Metropolitan Riverside County station for 2020) (SCAQMD 2020). Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard and Imperial Highway intersection, coupled with the ongoing improvements in ambient air quality, the Specific Plan would not be capable of resulting in a CO hot spot at any study area intersections.

The 2003 AQMP estimated that the 1-hour concentration for the Wilshire Boulevard and Veteran Avenue intersection was 4.6 ppm (SCAQMD 2003a); this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4 = 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm). The highest trips on a segment of road that the Specific Plan would generate is 87,515 vehicles per day on Meridian Parkway and Van Buren Boulevard.

The busiest intersection evaluated for traffic volumes was at La Cienega Boulevard and Century Boulevard, which has a traffic volume of approximately 8,674 vehicles per hour (SCAQMD 2003a). The highest trips on a segment of road for the proposed Project during the non-peak season is 8,669 vehicles per hour on Alessandro Boulevard/Arlington Avenue and Chicago Avenue. As such, Specific Plan-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP. The Specific Plan buildout considered herein would not produce the volume of traffic required to generate a CO hot spot either in the context of the 2003 Los Angeles hot spot study or based on representative Bay Area Air Quality Management District CO threshold considerations (BAAQMD 2017). Therefore, CO hot spots are not an environmental impact of concern for the Specific Plan.

Specific Plan traffic would not create or result in a CO hot spot. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Specific Plan operations, and impacts would be **less than significant,** and no mitigation is required.

Health Risk Assessment

Proximity to sources of toxics is critical to determining the impact of the Project. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop-off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80% drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center.

The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources.

A 0.25-mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than, the 1,000-foot impact radius identified above. Figure 4.2-1 illustrates the nearest modeled sensitive receptors.

Construction Health Risk Assessment

Without mitigation, Specific Plan Area construction was modeled with standard tier emission construction equipment; with **MM-AQ-1**, Specific Plan Area construction was modeled with Tier 4 Final construction equipment.

The land use with the greatest potential exposure to Specific Plan Area construction-source DPM emissions is Location R11 which is located approximately 304 feet north of the mixed-use portion of the Specific Plan Area at an existing residence located at 971 Saltcoats Drive. R11 is placed in the private outdoor living areas (backyard) facing the Specific Plan Area. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project construction-source DPM emissions is estimated at 4.57 in one million without mitigation and 0.56 in one million with mitigation, both of which are less than the SCAQMD significance threshold of 10 in one million. ~~The health risk assessment included application of **PDF-AQ-1**, Tier 4 Final off-road equipment. Additionally, as required by **PDF-AQ-2**, throughout construction the applicant will demonstrate compliance with all construction equipment assumptions included in Appendix C-1 of this EIR. At the maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Specific Plan construction source DPM emissions is estimated at 0.59 in one million, which is less than the SCAQMD's significance threshold of 10 in one million.~~ At this same location, non-cancer risks were estimated to be <0.01 with and without mitigation, which would not exceed the applicable threshold of 1.0. As such, the Specific Plan Area would not cause a significant human health or cancer risk to adjacent land uses as a result of construction activity. All other receptors during construction activity would experience less risk than what is identified for this location (Appendix C-2).

The results of the health risk assessment indicate that the Specific Plan would not result in any significant health risk impacts from exposure to TACs from construction (Appendix C-2). Thus, impacts to sensitive receptors would be **less than significant**, and no mitigation is required**.** **MM-AQ-1** further reduces construction-related impacts to sensitive receptors.

Operational Health Risk Assessment

Without mitigation, Project operations were modeled as follows:

- TRU engines would operate for approximately 2.1 hours while on site and parked at loading docks.
- Trucks would idle for a total of 15 minutes while on site and parked at loading docks.[16]
- On-site cargo handling equipment would be average tier equipment.
- Emergency generators would be average tier generators.

With mitigation, Project operations were modeled as follows:

- **MM-AQ-8 (Electric TRU Hookups)** – TRU engines would operate for 30 minutes while on site, but not at a loading dock.
- **MM-AQ-17 (Truck Idling Restrictions)** – Trucks would idle for a maximum of 3 minutes while on site and parked at loading docks.
- **MM-AQ-18 (Electric On-Site Cargo Handling Equipment)** – Tier 4 Final equipment. The Project building occupants would utilize either electric, hydrogen-fuel cell, or compressed natural gas equipment. Tier 4 diesel-powered yard hostlers can only be used if electric equipment is technically infeasible. Modeling Tier 4 equipment for the mitigated scenario conservatively understates the emissions reductions under **MM-AQ-18** to provide the "worst case scenario."
- **MM-AQ-24 (Emergency Generators)** – Tier 4 Final generators. The use of diesel-powered back-up generators would be prohibited unless absolutely necessary, and then only Tier 4 Final or better. Modeling Tier 4 diesel-powered generators for the mitigated scenario conservatively understates the emissions reductions under **MM-AQ-24** to provide the "worst case scenario."

Residential Exposure Scenario

Without mitigation, the residential land use with the greatest potential exposure to Project operational-source DPM emissions is Location R3, which is located approximately 299 feet north of the business park portion of the Project site at an existing residence located at 20635 Camino Del Sol. R3 is placed in the private outdoor living areas (backyard) facing the Project site. At the MEIR, without mitigation, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at 5.26 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0.

With mitigation, ~~T~~the residential land use with the greatest potential exposure to Specific Plan Area operational-source DPM emissions is Location R12 which is located approximately 859 feet south of the business park portion of the Specific Plan Area at an existing residence located at 20620 Iris Canyon Road. R12 is placed in the private outdoor living areas (backyard) facing the Specific Plan Area. ~~The operational health risk assessment included application of **PDF-AQ-2**, all-electric cargo-handling equipment.~~ At the MEIR, the maximum incremental cancer risk attributable to Project operational-source DPM emissions is estimated at ~~1.47~~ 2.23 in one million, which is less than the SCAQMD's significance threshold of 10 in one million. At this same location, non-cancer risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.

[16] 15 minutes is used for the total idling time for an individual truck (i.e., multiple locations on the site), but a truck would be idling no more than 5 minutes (SCAQMD requirement) at any single location.

Because all other modeled residential receptors are exposed to lesser concentrations and are located at a greater distance from the Specific Plan Area than the MEIR analyzed herein, and TACs generally dissipates with distance from the source, all other residential receptors in the vicinity of the Specific Plan Area would be exposed to less emissions and therefore less risk than the MEIR identified herein. As such, the Specific Plan would not cause a significant human health or cancer risk to nearby residences. ~~The nearest modeled receptors are illustrated on Exhibit 2-D in Appendix C-2.~~

Worker Exposure Scenario[17]

The worker receptor land use with the greatest potential exposure to Specific Plan Area operational-source DPM emissions is Location R13, which represents the potential worker receptor located approximately 4,113 feet east of an industrial portion of the Specific Plan Area. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact without mitigation is 0.89 in one million and with mitigation it is 0.79 in one million, both of which are less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be ≤0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. ~~At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.60 in one million which is less than the SCAQMD's threshold of 10 in one million. Maximum non-cancer risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0.~~

Because all other modeled worker receptors are located at a greater distance than the MEIW analyzed herein, and DPM dissipates with distance from the source, all other worker receptors in the vicinity of the Specific Plan Area would be exposed to less emissions and therefore less risk than the MEIW identified herein. As such, the Specific Plan would not cause a significant human health or cancer risk to adjacent workers. ~~The nearest modeled receptors are illustrated on Exhibit 2-D in Appendix C-2.~~

School Child Exposure Scenario

~~Proximity to sources of toxics is critical to determining the impact. In traffic related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80% drop off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center.~~

~~The 1,000 foot evaluation distance is supported by research based findings concerning Toxic Air Contaminant (TAC) emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources.~~

A one-quarter mile radius, or 1,320 feet, is commonly utilized for identifying sensitive receptors, such as schools, that may be impacted by a proposed project. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above.

[17] SCAQMD guidance does not require assessment of the potential health risk to on-site workers. Excerpts from the document OEHHA Air Toxics Hot Spots Program Risk Assessment Guidelines—The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2003), also indicate that it is not necessary to examine the health effects to on-site workers unless required by RCRA (Resource Conservation and Recovery Act)/CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act) or the worker resides on site.

The nearest school is the preschool located at Grove Community Church (Location R8), located approximately 794 feet southwest of the Specific Plan Area. At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact attributable to the Project without mitigation is calculated to be 0.74 in one million and with mitigation is calculated to be 0.32 in one million, both of which are less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Project were calculated to be ≤0.01 with and without mitigation, which would not exceed the applicable significance threshold of 1.0. ~~At the maximally exposed individual school child (MEISC), the maximum incremental cancer risk impact attributable to the Specific Plan is calculated to be 0.21 in one million, which is less than the significance threshold of 10 in one million. At this same location, non-cancer risks attributable to the Specific Plan were calculated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, the Specific Plan would not cause a significant human health or cancer risk to nearby school children.~~

The next nearest elementary school is Benjamin Franklin Elementary School, which is located approximately 2,320 feet southwest of the Specific Plan Area. Because there is no reasonable potential that TAC emissions would cause significant health impacts at distances of more than one-quarter mile from the air pollution source, there would be no significant impacts that would occur to any other schools in the vicinity of the Specific Plan (Appendix C-2).

As such, the Specific Plan would not cause a significant human health or cancer risk to nearby school children.

The results of the health risk assessment indicate that Specific Plan buildout would not result in any significant health risk impacts from exposure to TACs from operation (Appendix C-2). Thus, impacts to sensitive receptors would be **less than significant**, and no mitigation is required**.** **MM-AQ-8, MM-AQ-17, MM-AQ-18,** and **MM-AQ-24** further reduce operations-related impacts to sensitive receptors.

Proposed Park Exposure Scenario

Although not required under CEQA, for informational purposes, the analysis also considered the potential risk that may occur at the proposed Park that is a part of the Specific Plan Area and would be located to the west of the mixed-use parcels of the Campus Development. The analysis assumed a conservative scenario in which exposure occurs at the Park daily over a period of 9 years for 12 hours per day (equivalent to a school exposure scenario). The maximum potential cancer risk attributed to operation of the proposed Project was estimated to be 1.48 without mitigation and 0.62 with mitigation, both of which are less than the SCAQMD's threshold of 10 in one million. Non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable significance threshold of 1.0. As such, operation of the Project would not result in a significant impact for users of the proposed Park.

Construction and Operational Impacts

The land use with the greatest potential increased cancer risk due to exposure to Specific Plan Area construction-source and operational-source DPM emissions is Location R11 without mitigation and Location R12 with mitigation. At Location R11, without mitigation, the maximum incremental cancer risk attributable to Project construction and operational DPM source emissions is estimated at 4.36 in one million, while at Location R12, with mitigation, the maximum incremental cancer risk is estimated at 1.33 in one million, both of which are less than the threshold of 10 in one million. At both locations, with and without mitigation, non-cancer risks were estimated to be ≤0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during construction and operational activity would experience less risk than what is identified for this location.

Health Effects of Criteria Air Pollutants

NO_X and ROG are precursor emissions that form O_3 in the atmosphere in the presence of sunlight where the pollutants undergo complex chemical reactions. It takes time and the influence of meteorological conditions for these reactions to occur, so O_3 may be formed at a distance downwind from the sources. Breathing ground-level O_3 can result health effects that include reduced lung function, inflammation of airways, throat irritation, pain, burning, or discomfort in the chest when taking a deep breath, chest tightness, wheezing, or shortness of breath. In addition to these effects, evidence from observational studies strongly indicates that higher daily O_3 concentrations are associated with increased asthma attacks, increased hospital admissions, increased daily mortality, and other markers of morbidity. The consistency and coherence of the evidence for effects upon asthmatics suggests that O_3 can make asthma symptoms worse and can increase sensitivity to asthma triggers.

As explained in the Brief of Amicus Curiae by the SCAQMD (Brief, April 6, 2015) in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (*Friant Ranch*) (Appendix C-3), the SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the state, and thus it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes. The Brief discusses that it may be infeasible to quantify health risks caused by individual projects, due to various factors. It is necessary to have data regarding the sources and types of air toxic contaminants, location of emission points, velocity of emissions, the meteorology and topography of the area, and the location of receptors (worker and residence). The Brief also cites the author of the CARB methodology, which reported that a $PM_{2.5}$ methodology is not suited for small projects and may yield unreliable results. Similarly, SCAQMD staff does not currently know of a way to accurately quantify O_3-related health impacts caused by NO_X or ROG (VOC) emissions from relatively small projects, due to photochemistry and regional model limitations. The Brief concludes, with respect to the Friant Ranch EIR, that although it may have been technically possible to plug the data into a methodology, the results would not have been reliable or meaningful.

As noted in the Brief, it would be extremely difficult, if not impossible to quantify health impacts of criteria pollutants for various reasons, including modeling limitations, as well as where in the atmosphere air pollutants interact and form for a development as small as the proposed Project. Furthermore, as noted in the Brief of Amicus Curiae by the San Joaquin Valley Air Pollution Control District (April 13, 2015), San Joaquin Valley Air Pollution Control District has acknowledged that currently available modeling tools are not equipped to provide a meaningful analysis of the correlation between an individual development project's air emissions and specific human health impacts. The San Joaquin Valley Air Pollution Control District notes, "…the Air District is simply not equipped to analyze and to what extent the criteria pollutant emissions of an individual CEQA project directly impact human health in a particular area…even for projects with relatively high levels of emissions of criteria pollutant precursor emissions."

The briefs make it clear that two expert agencies do not believe that there must be a quantification of a project's health risks in all CEQA documents prepared for individual projects. To date, the SCAQMD has not released any additional guidance on *Friant Ranch* analysis. Any attempt to quantify the Project's health risks would be considered unreliable and misleading.

Conclusion

Emissions from construction and operation of Specific Plan buildout would not exceed applicable LST, CO hotspot, or HRA thresholds. As such, impacts would be **less than significant**, and no mitigation is required.

Conservation Easement

Under the Project, a Conservation Easement would be established consistent with the terms of the CBD Settlement Agreement (Appendix S). No construction activities would occur within the Conservation Easement, and no change to existing conditions would occur. As such, **no impacts** with respect to air quality would occur with the establishment of the Conservation Easement.

Threshold AQ-4. Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Specific Plan Area (Campus Development, Park, and Infrastructure Improvements)

The potential for Specific Plan buildout to generate objectionable odors has also been considered. Land uses generally associated with odor complaints include the following:

- Agricultural uses (livestock and farming)
- Wastewater treatment plants
- Food processing plants
- Chemical plants
- Composting operations
- Refineries
- Landfills
- Dairies
- Fiberglass molding facilities

Potential odor sources associated with the proposed Specific Plan may result from construction equipment exhaust, the application of asphalt and architectural coatings during construction activities, and the temporary storage of typical solid waste (refuse) associated with the proposed Specific Plan's long-term operational uses. Standard construction requirements would minimize odor impacts from construction. Construction odor emissions would be temporary, short-term, and intermittent, and would cease upon completion of the respective phase of construction; thus, the impact would be less than significant. Under the proposed Specific Plan, no land uses identified as sources of odor above would be permitted. The proposed Specific Plan land uses would be required to comply with SCAQMD Rule 402, Nuisance, to prevent occurrences of public nuisances. Therefore, odors associated with implementation of the Specific Plan during construction and operations would be **less than significant**.

Conservation Easement

Under the Project, a Conservation Easement would be established consistent with the terms of the CBD Settlement Agreement (Appendix S). No construction activities would occur within the Conservation Easement, and no change to existing conditions would occur. As such, **no impacts** with respect to air quality would occur with the establishment of the Conservation Easement.

4.2.7 Mitigation Measures

CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measures have been evaluated for feasibility and would be incorporated into the Project to further reduce potentially significant construction VOC and NO_x emission impacts, and operational VOC, NO_x, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emission impacts ~~and potential odor impacts~~.

~~PDF~~MM-AQ-1 Prior to issuance of each grading permit and building permit, the applicant shall provide evidence that all o~~O~~ffroad equipment used during construction shall meet CARB Tier 4 Final emission standards or better.

~~PDF~~MM-AQ-2 Construction Budget. To ensure construction activities occur within the assumptions utilized in the Revised Air Quality Impact Analysis (AQIA) (Appendix C-1) and disclosed in the EIR, the following shall be implemented during each phase of Project construction as shown on Table 3-3, Construction Schedule:

- ~~During each Phase of Project construction, t~~The operating hours of construction equipment on site shall not exceed 8 hours and the additional assumptions set forth in Table 5-2 of the Revised AQIA. In the event alternate equipment is required, the applicant shall provide documentation demonstrating equivalent or reduced emissions based on horsepower and hours of operation. The construction contractor shall submit a construction equipment hours log to the March JPA every 2 weeks to ensure compliance.
- During Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for Mass Grading and 20 acres per day for Blasting & Rock Handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for Remedial Grading. The construction contractor shall submit a grading log to the March JPA every two weeks documenting acreage graded or equivalent cubic yardage to ensure compliance. "Active disturbance" does not include moving of equipment from staging area(s) to grading areas or haul routes between grading areas if the active disturbance areas are not contiguous.

MM-AQ-3 Prior to issuance of each grading permit and building permit, the applicant shall provide evidence that the subject plans contain the following requirements and restrictions:

- No grading shall occur on days with an Air Quality Index forecast greater than 150 for particulates or ozone as forecasted for the project area (Source Receptor Area 23).
- Contractor shall require all heavy-duty trucks hauling onto the project site to be model year 2014 or later. This measure shall not apply to trucks that are not owned or operated by the contractor 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.
- No construction equipment idling longer than 3 minutes at any one location shall be permitted.
- All construction equipment shall be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records onsite and available to regulatory authorities upon request.
- No diesel-powered portable generators shall be used, unless necessary due to emergency situations or constrained supply.

- Contractor required to provide transit and ridesharing information to onsite construction workers.
- Contractor required to establish one or more locations for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service.
- Use of electric-powered hand tools, forklifts and pressure washers, to the extent feasible.
- Designation of an area in the construction site where electric-powered construction vehicles and equipment can charge.

MM-AQ-~~4~~1 Prior to issuance of building permits, the developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints which have been reformulated to exceed the regulatory VOC limits put forth by SCAQMD's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.

~~PDF~~MM-AQ-~~5~~3 **Future Site Plans**. All Specific Plan Area site plans shall include documentation confirming the site plan's environmental impacts do not exceed the impacts identified and disclosed in this EIR. Absent such documentation, additional environmental review shall be required.

MM-AQ-6 All buildings constructed shall achieve the 2023 LEED Silver certification standards or equivalent, at a minimum. Prior to issuance of certificate of occupancy, applicant shall provide March JPA with evidence of compliance with the LEED standards.

MM-AQ-~~7~~4 Prior to the issuing of each building permit, the Project applicant and its contractors 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~~10 Prior to the issuance of a building permit, the Project applicant shall provide evidence to the March Joint Powers Authority that all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks.

MM-AQ-9 Prior to issuance of a building permit for any industrial facility with a building or buildings larger than 400,000 total square feet, the approved construction plans for the facility shall include a truck operator lounge equipped with clean and accessible amenities such as restrooms, vending machines, television, and air conditioning.

MM-AQ-10 Prior to issuance of a building permit, the approved construction plans shall include cool surface treatments to all drive aisles and parking areas or such areas shall be constructed with a solar-reflective cool pavement such as concrete.

MM-AQ-~~11~~15 Prior to issuance of a building permit, the Project applicant 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 'clean fleet' ~~heavy truck~~ charging facilities, including heavy-duty and delivery trucks 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.

MM-AQ-12 Prior to issuance of a building permit, the Project applicant shall provide the March Joint Powers Authority with an on-site signage program that clearly identifies the required on-site circulation system. This shall be accomplished through posted signs and painting on driveways and internal roadways.

MM-AQ-135 Prior to the issuing of each building permit, the Project applicant and its contractors 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. Said electrical outlets shall be located no more than every 200 feet apart. This measure may also be satisfied by locating charging stations around the building to accommodate battery-operated equipment.

MM-AQ-146 Once constructed, the Project applicant or successor in interest shall ensure that all building occupants shall utilize electric or battery-operated equipment for landscape maintenance through requirements in the lease agreements or purchase and salesell agreement.

MM-AQ-1513 Prior to issuance of an occupancy permit, the March Joint Powers Authority shall confirm that signs clearly identifying the approved truck routes have been installed along the truck routes to and from the project site and within the project site.

MM-AQ-1614 Prior to issuance of an occupancy permit, the Project applicant 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 or Riverside County, as determined by the permitting authority, and the South Coast Air Quality Management District 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-172 Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable 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 ~~five (5)~~ three (3) 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, South Coast Air Quality Management District, and the California Air Resources Board to report violations. Prior to the issuance of an occupancy permit, the March Joint Powers Authority shall conduct a site inspection to ensure that the signs are in place. One six square foot sign providing this information shall be located on the building between every two dock-high doors and the sign shall be posted in highly visible locations at the entrance gates, semi parking areas, and trailer parking locations.

MM-AQ-187 Once constructed, through requirements in the lease agreements or purchase and salesell agreement, the Project applicant or successor in interest shall ensure that all building occupants shall utilize only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. Yard hostlers may be diesel fueled in lieu of electrically powered, provided that the occupant submits a letter identifying that electric hostlers are technically infeasible and provided such yard hostlers are compliant with California Air Resources Board (CARB) ~~2010 standards for on-road vehicles or CARB~~ Tier 4 Final compliant for

off-road vehicles. As an alternative, hydrogen fuel-cell or compressed natural gas (CNG) powered equipment shall also be acceptable.

MM-AQ-193 Prior to tenant occupancy, the Project applicant or successor in interest shall provide documentation to the 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-208 Trucks: Upon occupancy, through requirements in the lease agreements or purchase and salesell agreement, the facility operator shall require all heavy-duty trucks (Class 7 and 8) domiciled at the Project site to be model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030, or when commercially available for the intended application, whichever date is later. 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.

"Commercially available" means if the vehicle is capable of serving the intended application (including sufficient off-site charging infrastructure) and is included in California's Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project, https://californiahvip.org/vehiclecatelog/. The March JPA shall be responsible for the final determination of commercial availability and may (but is not required to) consult with the California Air Resources Board before making such final determination. In order for the March JPA to make a determination that such vehicles are commercially unavailable, the operator must submit either (1) documentation from a minimum of three EV dealers identified on the californiahvip.org website demonstrating the inability to obtain the required EVs or equipment needed within 6 months and/or (2) documentation that sufficient off-site charging infrastructure is not available between the site and destinations, taking into account a minimum of 15% route mileage deviation for access.

"Domiciled at the Project site" shall mean the vehicle is either (1) parked or kept overnight at the Project site more than 70% of the calendar year or (2) dedicated to the Project site (defined as more than 70% of the truck routes [during the calendar year] start at the Project site even if parked or kept elsewhere).

Zero-emission heavy-duty trucks that require service can be temporarily replaced with model year 2014 or later trucks. Replacement trucks shall be used for only the minimum time required for servicing fleet trucks.

Occupants shall be encouraged to consider the use of alternative fueled trucks as well as new or retrofitted diesel trucks. Occupants 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.

Vehicles/Delivery Vans: Upon occupancy, through requirements in the lease agreements or purchase and sale agreement, the facility operator shall require tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any

vehicle (Class 2 through 6) domiciled at the Project site, the following "clean fleet" requirements apply: (1) 33% of the fleet will be zero emission vehicles at start of operations, (2) 65% of the fleet will be zero emission vehicles by December 31, 2026, (3) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (4) 100% of the fleet will be zero emission vehicles by December 31, 2030.

"Domiciled at the Project site" shall mean the vehicle is either (1) parked or kept overnight at the Project site more than 70% of the calendar year or (2) dedicated to the Project site (defined as more than 70% of the truck routes [during the calendar year] start at the Project site even if parked or kept elsewhere).

Zero-emission vehicles that require service can be temporarily replaced with alternate vehicles. Replacement vehicles shall be used for only the minimum time required for servicing fleet vehicles.

This measure shall not apply to vehicles 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 vehicle that is otherwise legal to operate on California roads and highways.

MM-AQ-219 Through requirements in the lease agreements or purchase and salesell agreement, 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. 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 the March JPA. 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. Alternatively, establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees.
- Designate areas for employee pickup and drop-off.
- Coordinate with the Riverside Transit Agency and employers in the surrounding area to maximize the benefits of the TDM program.

MM-AQ-2211 Through requirements in the lease agreements or purchase and salesell agreement, upon occupancy and annually thereafter, the facility operator 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 GHG emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting.
- Participation in the Voluntary Interindustry 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.
- Efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

MM-AQ-23 Through requirements in the lease agreements or purchase and sale agreement, upon occupancy and once a month thereafter, the facility operator shall sweep the property, including parking lots and truck courts, to remove road dust, tire wear, brake dust, and other contaminants.

MM-AQ-24 Through requirements in the lease agreements or purchase and sale agreement, upon occupancy, tenants shall not use diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to March JPA's satisfaction, that no other back-up energy source(s) are available and sufficient for the building's needs. If absolutely necessary, at the time of initial operation, generators shall have Best Available Control Technology that meets CARB's Tier 4 emission standards or meets the most stringent in-use standard, whichever has the least emissions. In the event rental back-up generators are required during an emergency, the units shall be located at the Project site for only the minimum time required. Tenants shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.

MM-AQ-25 Through requirements in the lease agreements or purchase and sale agreement, upon occupancy, the facility operator shall monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable, by maintaining records on-site demonstrating compliance and making records available for inspection by the local jurisdiction, air district, and state upon request.

MM-AQ-26 Through requirements in the lease agreements or purchase and sale agreement, upon occupancy, the facility operator shall ensure that any outdoor areas allowing smoking are at least 25 feet from the nearest property line.

MM-AQ-27 Through requirements in the lease agreements or purchase and sale agreement, tenants shall comply with all applicable requirements of the MMRP, a copy of which shall be attached to each agreement.

4.2.8 Level of Significance After Mitigation

Construction Impacts

As discussed under Thresholds AQ-1 and AQ-2, the Specific Plan would conflict with Consistency Criterion No. 1, and the Specific Plan's construction emissions would exceed the VOC and NO_X SCAQMD significance thresholds. The Specific Plan would implement **MM-AQ-1** through **MM-AQ-4,** which would reduce emissions of VOCs and NO_X. As shown in Table 4.2-12, after implementation of **MM-AQ-1** through **MM-AQ-4**, Specific Plan construction-source emissions of VOC and NO_X would not exceed the applicable SCAQMD thresholds. Thus, impacts would be **less than significant with mitigation incorporated**.

Table 4.2-12. Estimated Maximum Daily Construction Criteria Air Pollutant Emissions - Mitigated

Year	VOC (pounds per day)		NO_X (pounds per day)
2023	~~9.74~~	9.73	56.07
2024	~~14.90~~	10.70	55.44
2025	~~9.37~~	9.38	26.50
2026	~~29.60~~	29.60	32.97
2027	~~33.41~~	33.36	10.84
Maximum	~~*33.41*~~	*33.36*	*56.07*
SCAQMD Threshold	*75*		*100*
Threshold Exceeded?	No		No

Source: Appendix C-1
Notes: VOC = volatile organic compound; NOx = oxides of nitrogen; ~~CO = carbon monoxide; SOx = sulfur oxides; PM10 = particulate matter with an aerodynamic diameter equal to or less than 10 microns; PM2.5 = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; <0.01 = reported emissions are less than 0.01;~~ SCAQMD = South Coast Air Quality Management District.
Includes application of ~~PDF-AQ-1~~MM-AQ-1, Tier 4 Final off-road equipment, and ~~MM-AQ-1~~MM-AQ-4, low-VOC architectural coatings.

As discussed under Threshold AQ-3, the Project would have a less than significant localized impact during construction activity and no mitigation would be required. As shown in Table 4.2-13, implementation of **MM-AQ-1** (Tier 4 Construction Equipment) would further reduce the localized impact. The use of Tier 4 construction equipment under the mitigated scenario would reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions but result in a potential increase in CO emissions. This is attributable to some emission control technologies, such as exhaust gas recirculation, that reduce NO_X emissions while increasing CO emissions. However, CO emissions under the mitigated scenario would remain below the applicable SCAQMD significance threshold. Detailed mitigated construction model outputs are presented in Appendix C-1.

Table 4.2-13. Localized Significance Summary – Construction - Mitigated

	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
Peak Construction	*1-Hour*	*8-Hour*	*1-Hour*	*24-Hours*	*24-Hours*
Peak Day Localized Emissions	0.06	0.02	3.91E-03	1.17	0.39
Background Concentration[a]	2.1	1.8	0.066	—	—
Total Concentration	**2.16**	**1.82**	**0.07**	**1.17**	**0.39**
SCAQMD Localized Significance Threshold	*20*	*9*	*0.18*	*10.4*	*10.4*

Table 4.2-13. Localized Significance Summary – Construction - Mitigated

	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
Peak Construction	*1-Hour*	*8-Hour*	*1-Hour*	*24-Hours*	*24-Hours*
Threshold Exceeded?	No	No	No	No	No

Source: Appendix C-1.
Notes: NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; SCAQMD = South Coast Air Quality Management District.
PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m³. All others are expressed in ppm.
Includes application of MM-AQ-1, Tier 4 Final off-road equipment.
[a] Highest concentration from the last three years of available data.

Operational Impacts

As discussed under Thresholds AQ-1 and AQ-2, the Specific Plan would exceed regional thresholds of significance established by the SCAQMD for VOC, NO_x, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions; thus, the Specific Plan's unmitigated impacts would be potentially significant. ~~The majority of the Specific Plan's operational VOC, NO_x, CO, and PM_{10} emissions would be derived from the mobile sources. The Specific Plan would implement MM-AQ-2 through MM-AQ-15 to reduce the Specific Plan's operational VOC, NO_x, CO, and PM_{10} emissions; however, there is no meaningful way to quantify these reductions in CalEEMod and therefore no numeric emissions credit was taken in the analysis.~~ As previously stated, the Project will implement operational MM-AQ-5 through MM-AQ-27, which would reduce Project operational-source emissions. The following operational mitigation measures are quantifiable in CalEEMod:

- MM-AQ-8: Assumed the use of electrical hookups for all TRU loading docks.
- MM-AQ-14: Assumed the use of all electric or battery-operated landscaping equipment.
- MM-AQ-18: Assumed the use of operational on-site cargo handling equipment that meets or exceeds Tier 4 Final emissions standards.
- MM-AQ-24: Assumed the use of emergency generators that meet or exceed Tier 4 Final emissions standards.

While the remaining operational mitigation measures would reduce Project operational-source emissions, the resulting emission reductions are not quantifiable in CalEEMod, and as such, reductions were not quantified and are therefore not reflected in the analysis. As shown in Table 4.2-14, after accounting for MM-AQ-8, MM-AQ-14, MM-AQ-18 and MM-AQ-24, Project operational emissions would exceed SCAQMD thresholds for emissions of VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$.

Table 4.2-14. Summary of Project Operational Emissions - Mitigated

	Emissions (pounds per day)					
Source	*VOC*	*NO_X*	*CO*	*SO_X*	*PM_{10}*	*$PM_{2.5}$*
Summer						
Mobile Source	174.00	308.00	2,148.00	6.90	577.00	151.00
Area Source	122.00	0	0	0	0	0
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment	0.25	1.28	18.30	0.02	0.05	0.05

Table 4.2-14. Summary of Project Operational Emissions - Mitigated

Source	Emissions (pounds per day)					
	VOC	*NO_X*	*CO*	*SO_X*	*PM_{10}*	*$PM_{2.5}$*
Stationary Source	18.70	5.50	47.70	0.09	0.28	0.28
TRU Source	34.56	36.27	4.17	0.00	1.18	1.09
Total Maximum Daily Emissions	**349.51**	**351.05**	**2,218.17**	**7.01**	**578.51**	**152.42**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**
Winter						
Mobile Source	166.00	328.00	1,762.00	6.52	577.00	151.00
Area Source	122.00	0.00	0.00	0.00	0.00	0.00
Energy Source	0.00	0.00	0.00	0.00	0.00	0.00
Operational Equipment	0.25	1.28	18.30	0.02	0.05	0.05
Stationary Source	18.70	5.50	47.70	0.09	0.28	0.28
TRU Source	34.56	36.27	4.17	0.00	1.18	1.09
Total Maximum Daily Emissions	**341.51**	**371.05**	**1,832.17**	**6.63**	**578.51**	**152.42**
SCAQMD Regional Threshold	*55*	*55*	*550*	*150*	*150*	*55*
Threshold Exceeded?	**Yes**	**Yes**	**Yes**	**No**	**Yes**	**Yes**

Source: Appendix C-1.
Notes: VOC = volatile organic compound; NO_x = oxides of nitrogen; CO = carbon monoxide; SOx = sulfur oxides; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District. Emissions include application of **MM-AQ-8** (TRU Electrical Hookups), **MM-AQ-14** (Electric/Battery-Operated Landscaping Equipment), **MM-AQ-18** (Electric On-Site Cargo Handling Equipment), and **MM-AQ-24** (Emergency Generators).

As noted above, these calculations do not account for the emission reductions that would result from all of the remaining mitigation measures as they are not quantifiable in CalEEMod. Thus, these figures represent a very conservative estimate. Therefore, the Specific Plan's operational VOC, NO_x, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions would be **significant and unavoidable**, and would, therefore, per SCAQMD criteria, be cumulatively significant and unavoidable.

As discussed under Threshold AQ-3, the Project would have a less than significant localized impact during operations and no mitigation would be required. As shown in Table 4.2-15, implementation of **MM-AQ-8** (TRU Electrical Hookups), **MM-AQ-14** (Electric/Battery-Operated Landscaping Equipment), **MM-AQ-18** (Electric On-Site Cargo Handling Equipment), and **MM-AQ-24** (Emergency Generators) would further reduce the localized impact.

Table 4.2-15. Localized Significance Summary – Operation - Mitigated

Peak Construction	CO		NO_2	PM_{10}	$PM_{2.5}$
	Averaging Time				
	1-Hour	*8-Hour*	*1-Hour*	*24-Hours*	*24-Hours*
Peak Day Localized Emissions	3.19E-02	2.62E-02	4.46E-03	2.26	0.63
Background Concentration[a]	2.1	1.8	0.066	—	—
Total Concentration	**2.13**	**1.83**	**0.07**	**2.26**	**0.63**
SCAQMD Localized Significance Threshold	*20*	*9*	*0.18*	*10.4*	*10.4*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

Source: Appendix C-1.

Notes: NO_x = oxides of nitrogen; CO = carbon monoxide; PM_{10} = particulate matter with an aerodynamic diameter equal to or less than 10 microns; $PM_{2.5}$ = particulate matter with an aerodynamic diameter equal to or less than 2.5 microns; SCAQMD = South Coast Air Quality Management District.
PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m3. All others are expressed in ppm.
Includes application of **MM-AQ-8 (TRU Electrical Hookups), MM-AQ-14 (Electric/Battery-Operated Landscaping Equipment), MM-AQ-18 (Electric On-Site Cargo Handling Equipment), and MM-AQ-24 (Emergency Generators).**
[a] Highest concentration from the last three years of available data.

4.2.9 Cumulative Effects

Air pollution by nature is largely a cumulative impact. The cumulative geographic context for air quality impacts is the SCAB. 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. Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the significance determinations. SCAQMD has developed regional significance thresholds for some regulated pollutants. March JPA has relied on these significance thresholds to make significance determinations for the Project's air quality impacts.

SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicates that any projects in the SCAB with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact. As stated in Appendix C-1, "SCAQMD has published a report on how to address cumulative impacts from air pollution: White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (55). In this report the SCAQMD clearly states (Page D-3) '…the AQMD uses the same significance thresholds for project specific and cumulative impacts for all environmental topics analyzed in an Environmental Assessment or EIR.'" Therefore, the air quality analysis for this Project assumed that individual projects that do not generate operational or construction emissions that exceed SCAQMD's recommended daily thresholds for project specific impacts would also not cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would not be considered to have a significant, adverse cumulative air quality impact. Conversely, projects exceeding SCAQMD's recommended daily thresholds for project specific impacts would also cause a cumulatively considerable increase in emissions for those pollutants for which the SCAB is in nonattainment, and, therefore, would be considered to have a significant, adverse cumulative air quality impact.

Air dispersion modeling was performed to analyze pollutant concentrations at nearby sensitive receptors, and the analysis indicates that pollutant concentrations would remain well below the applicable SCAQMD localized significance thresholds during Project construction and operation. Additionally, the Revised HRA (Appendix C-2) indicated that cancer and non-cancer risk to nearby sensitive receptors would be well below the applicable SCAQMD significance thresholds during construction and operation.

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. The potential for the Project to result in a cumulatively considerable impact, specifically a cumulatively considerable new increase of any criteria pollutant for which the Project region is nonattainment under an applicable NAAQS and/or CAAQS, is addressed in Section 4.2.5, Impacts Analysis. As set forth therein, because the Project would exceed the project-level thresholds for regional VOC, NO_x, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions during operation, the Project's cumulative impacts with respect to such emissions would be **considerable and significant.**

Health Risk from Cumulative Criteria Pollutants

As discussed under Threshold AQ-3, above, SCAQMD and the San Joaquin Valley Unified Air Pollution Control District (SJVAPCD) filed Amicus Curiae Briefs (amicus briefs) in *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502 (Friant Ranch) (Appendix C-3). In both amicus briefs, SCAQMD and SJVAPCD provided technical explanations as to why it may not be feasible or reliable for a project to relate the expected adverse air quality impacts to likely health consequences.

As summarized below, for the reasons set forth in the SCAQMD and SJVAPCD amicus briefs, the proposed Project's significant cumulative air quality impacts currently cannot feasibly be related to likely health consequences in an accurate or reliable manner. Although methods are being developed to determine health effects from large regional scale projects, the technical demands to feasibly and accurately relate the adverse air quality impacts to likely health consequences are too high for this Project at this time. The technical challenges are listed below, with the SCAQMD and SJVAPCD amicus briefs providing support on the findings for the Project:

- Ozone is not formed at the location of sources/emissions, which necessitates the use of complex and more sophisticated modeling that is not reasonably feasible for the proposed Project at this time. "For the so-called criteria pollutants, such as ozone, it may be more difficult to quantify health impacts. Ozone is formed in the atmosphere from the chemical reaction of the nitrogen oxides (NOx) and volatile organic compounds (VOC) in the presence of sunlight… It takes time and the influence of meteorological conditions for these reactions to occur, so ozone may be formed at a distance downwind from the sources." [SCAQMD brief, p.11]
- The quantity of precursor emissions is not proportional to local ozone and secondary PM concentration, which necessitates the use of complex and more sophisticated modeling that is not reasonably feasible for the proposed Project at this time. "Ground level ozone (smog) is not directly emitted into the air, but is formed when precursor pollutants such as oxides of nitrogen (NO_x) and volatile organic compounds (VOCs) are emitted into the atmosphere and undergo complex chemical reactions in the process of sunlight. Once formed, ozone can be transported long distances by wind. Because of the complexity of ozone formation, a specific tonnage amount of NO_x or VOCs emitted in a particular area does not equate to a particular concentration of ozone in that area." [SJVAPCD brief, p.4]
- "Secondary PM, like ozone, is formed via complex chemical reactions in the atmosphere between precursor chemicals such as sulfur dioxides (SOx) and NOx. Because of the complexity of secondary PM formation, the tonnage of PM-forming precursor emissions in an area does not necessarily result in an equivalent concentration of secondary PM in that area." [SJVAPCD brief, p.5]
- Emissions do not cause health effects—they are caused by the resulting concentration of criteria pollutants, which is influenced by sunlight, complex reactions, and transport, which necessitates the use of complex and more sophisticated modeling that is not reasonably feasible for this Project at this time. "The disconnect between the tonnage of precursor pollutants (NO_x, SO_x and VOCs) and the concentration of ozone or PM formed is important because it is not necessarily the tonnage of precursor pollutants that causes human health effects, but the concentration of resulting ozone or PM." [SJVAPCD brief, p.5]
- Currently available modeling tools are appropriate for regional evaluations, but not individual projects like the proposed Project. "For instance, the computer models used to simulate and predict an attainment date for the ozone or particulate matter NAAQS in the San Joaquin Valley are based on regional inputs, such as regional inventories of precursor pollutants (NOx, SOx and VOCs) and the atmospheric chemistry and meteorology of the Valley… the models simulate future ozone or PM levels based on predicted changes in precursor emissions Valley wide… The goal of these modeling exercises is not to determine whether the emissions generated by a particular factory or development project will affect the date that the Valley attains the NAAQS. Rather, the Air District's modeling and planning strategy is regional in nature and based

on the extent to which all of the emission-generating sources in the Valley (current and future) must be controlled in order to reach attainment." [SJVAPCD brief, p.6-7]. "Thus, the CEQA air quality analysis for criteria pollutants is not really a localized, project level impact analysis but one of regional, 'cumulative impacts.'" [SJVAPCD brief, p.8] "The currently available modeling tools are equipped to model the impact of all emission sources in the Valley on attainment… Running the photochemical grid model used for predicting ozone attainment with the emissions solely from the Friant Ranch project (which equate to less than one-tenth of one percent of the total NOx and VOC in the Valley) is not likely to yield valid information given the relative scale involved." [SJVAPCD brief, p.9-10]

- SJVAPCD indicates that it is currently impossible to accurately correlate project level emissions to specific health impacts. "Finally, even once a model is developed to accurately ascertain local increases in concentrations of photochemical pollutants like ozone and some particulates, it remains impossible, using today's models, to correlate that increase in concentration to a specific health impact. The reason is the same: such models are designed to determine regional, population-wide health impacts, and simply are not accurate when applied at the local level." [SJVAPCD brief, p.10]
- SCAQMD highlights that CARB indicated that a CARB methodology of analysis for $PM_{2.5}$ health impacts is not suited for a project such as this one. "Also, the California Air Resources Board (CARB) has developed a methodology that can predict expected mortality (premature deaths) from large amounts of $PM_{2.5}$,… SCAQMD used the CARB methodology to predict impacts from three very large power plants (e.g., 731-1837 lbs/day). Again, this project involved large amounts of additional $PM_{2.5}$ in the District, up to 2.82 tons/day (5,650 lbs/day of $PM_{2.5}$, or 1029 tons/year… However, the primary author of the CARB methodology has reported that this $PM_{2.5}$ health impact methodology is not suited for small projects and may yield unreliable results due to various uncertainties." "Among these uncertainties are the representativeness of the population used in the methodology, and the specific source of PM and the corresponding health impacts." [SCAQMD brief, p.14]. Here, the maximum operational emissions of $PM_{2.5}$ are 47.28 lbs/day. This is 0.8% of the emissions that were used in the CARB methodology.
- The development of new technical approaches in the future may change the feasibility determination. To date, SCAQMD has not developed or approved a method to predict health impacts from criteria pollutants. "Moreover, what is reasonably feasible may change over time as scientists and regulatory agencies continually seek to improve their ability to predict health impacts. For example, CARB staff has been directed by its Governing Board to reassess and improve the methodology for estimating premature deaths." [SCAQMD brief, p.16]

SCAG addressed the potential health implications of significant emissions that would result from implementation of the Connect SoCal RTP/SCS in the Connect SoCal RTP/SCS EIR (SCAG 2020).

For the reasons set forth above, it is not currently feasible to relate the Project's air quality impacts to likely health consequences. Both SCAQMD and SJVACPD are responsible for assessing ozone and PM impacts and the potential health consequences from those on a regional basis. The current evaluation on the limitations and uncertainties of existing tools is consistent with SCAQMD and SJVAPCD findings. Currently available regional modeling tools are not designed to capture changes in pollutant concentrations for this Project that would be meaningful. This is due in part to a relatively coarse spatial resolution (e.g., greater than 4 kilometers × 4 kilometers), which makes it speculative to discern local project impacts on air quality.

Cumulative Health Risk from Toxic Air Contaminants

SCAQMD does not have an approved methodology for evaluating cumulative TAC health impacts. Per SCAQMD's White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, projects that exceed the project-specific significance thresholds are considered to be cumulatively considerable (Appendix C-2). Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Because the proposed Project does not exceed the applicable cancer and non-cancer significance thresholds, TAC emissions generated by the proposed Project would not be considered cumulatively considerable.

EPA's guidance for air toxic analyses at the community scale considers a cancer risk of 100 in a million or less to be within the "acceptable" range of cancer risk (BAAQMD 2009, 2017). Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop-off in particulate pollution levels at 500 feet. Based on CARB and SCAQMD emissions and modeling analyses, an 80% drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources.

Lastly, the Waters Bill (AB 3205) (California Health and Safety Code Sections 42301.6 through 42301.9) addresses sources of hazardous air pollutants near schools, and, although not directly applicable to this Project, this bill further evidences the propriety of considering hazardous emissions sources within a defined 1,000-foot radius. That is, pursuant to the Waters Bill, prior to approving an application for a permit to construct or modify a source that emits hazardous air emissions (i.e., DPM) and is located within 1,000 feet from the outer boundary of a school site, the air pollution control officer shall prepare a public notice in which the proposed project or modification for which the application for a permit is made is fully described.

For assessing the cumulative impacts of a new source of TAC emissions associated with a project in combination with existing sources and probable future sources, a project radius is necessary. Assessment of impacts from existing sources within 1,000 feet (zone of influence) of the new source in combination with risks and hazards from the new source is recommended. Then, once the location of the maximally impacted receptor is identified for the project, cumulative impacts from other sources within the radius of the project (i.e., not the receptor) are assessed at that location. Assessments should sum individual hazards or risks to find the cumulative impact at the location of the maximally impacted receptor from the new source.

More recent studies suggest that in light of emission reductions due to tightening emission standards over the past twenty years, this 1,000-foot siting distance is overly conservative. Modeling performed for the 2021 report *Evaluating Siting Distances for New Sensitive Receptors Near Warehouses*, prepared by the Ramboll Group, demonstrates a significant reduction in DPM emissions and risk between year 2000 emissions (which were utilized by CARB in establishing its recommended siting guidance of 1,000 feet) and 2021 (City of Fontana 2021). This reduction is attributed to a significant reduction in DPM emission rates from trucks and TRUs resulting from the adoption of increasingly stringent emission standards. This reduction in DPM emission rates has resulted in a corresponding significant reduction in risk as well, despite increasingly conservative regulatory guidance in the preparation of HRAs, particularly the Office of Environmental Health Hazard Assessment's adoption of age sensitivity factors in its revised RA guidance released in 2015.

Figure 4.2-2 illustrates the cumulative projects located within 1,000 feet of the proposed Project site or Project truck routes. As shown in Table 4.2-16, there are 11 cumulative development projects but only 9 industrial/warehouse projects located within 1,000 feet of the Project site or Project truck routes.

Table 4.2-16. Cumulative Development Land Use Summary

ID	Project Name	Land Use	Quantity Units
March Joint Powers Authority			
MJPA1	Meridian Business Park (West Campus)	Industrial Park	2,278.852 TSF
MJPA2	K4 Parcel	Warehouse	718.000 TSF
MJPA4	Freeway Business Center	Warehouse	709 TSF
MJPA5	Veteran's Industrial Plaza/VIP 215	Warehouse	2,000.000 TSF
MJPA6	Veteran's Plaza	Commercial Retail	198.000 TSF
MJPA7	MS Van Buren I	Warehouse	176.396 TSF
City of Riverside			
R16	P12-0507 through P12-0510	Warehouse/Industrial	235.741 TSF
R18	P13-0553, P13-0554, P13-0583, P14-0065	Multi-Family Residential	275 DU
R19	P13-0607, P130608, P13-0609, P13-0854	Industrial	171.616 TSF
R22	P14-0600, P14-0601, P14-0602, P15-044	Industrial	121.390 TSF
City of Moreno Valley			
MV2	Moreno Valley Cactus Center (PEN16-0131)	Warehouse	36.950 TSF
		Fast Food w/Drive Thru	7.900 TSF
		Gas Station w/Car Wash	28 VFP

Source: Appendix C-2.
Notes: TSF = thousand square feet; DU = dwelling units; VFP = Vehicle Fueling Positions.

Of these projects, MJPA7, R16, R19, R22, and MV2 represent a total of approximately 742,093 square feet, composed of buildings ranging from 36,950 square feet to 235,741 square feet of warehouse/industrial space. Based on the Institute of Transportation Engineers (ITE) Trip Generation Manual, 11th Edition (2021) (ITE 150 rate for uses ranging from 6,950 square feet to 235,741 square feet), 742,093 square feet of warehouse could generate approximately 296 daily truck trips. As such, MJPA7, R16, R19, R22, and MV2 could generate approximately 296 additional daily truck trips that could comingle with the Project and other cumulative development. These 296 additional truck trips represent approximately 14% of the Project's total truck trip estimate of 2,054 truck trips. Therefore, it is estimated that MJPA7, R16, R19, R22, and MV2 could result in approximately 14% of the risk calculated for the proposed Project, which would result in an additional cancer risk of 0.31 per million. Of the remaining projects, the HRAs prepared for MJPA1 (Meridian Business Park West Campus), MJPA2 (K4 Parcel), MJPA4 (Freeway Business Center), and MJPA5 (Veterans Industrial Park 215) were reviewed. The cancer risk from these projects and the proposed Project is presented below in Table 4.2-17.

Table 4.2-17. Cumulative Cancer Risk

Project	Maximum Incremental Cancer Risk (risk per million)
Proposed Project	2.23
MJPA1	4.79
MJPA2	0.50
MJPA4	1.60

Table 4.2-17. Cumulative Cancer Risk

Project	Maximum Incremental Cancer Risk (risk per million)
MJPA5	0.02
MJPA7, R16, R19, R22, and MV2	0.31
Total Cancer Risk	**9.45**
EPA Threshold	*100*
Threshold Exceeded?	**No**

Source: Appendix C-2

The maximum incremental cancer risk shown above for each project represents the risk at the maximally exposed individual receptor for each project; each of these receptors are in a different location. As such, the total cumulative cancer risk of 9.45 in one million shown above is highly conservative, and the actual risk contributions from each project would be less than this combined value. Despite this conservative approach, the total cumulative cancer risk is well below EPA's standard cumulative cancer risk threshold of 100 in one million. Therefore, the Project's contribution to the cumulative health risk from TACs would not be cumulatively considerable.

4.2.10 References Cited

AG (California Attorney General). 2022. Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. Updated September 2022. https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf

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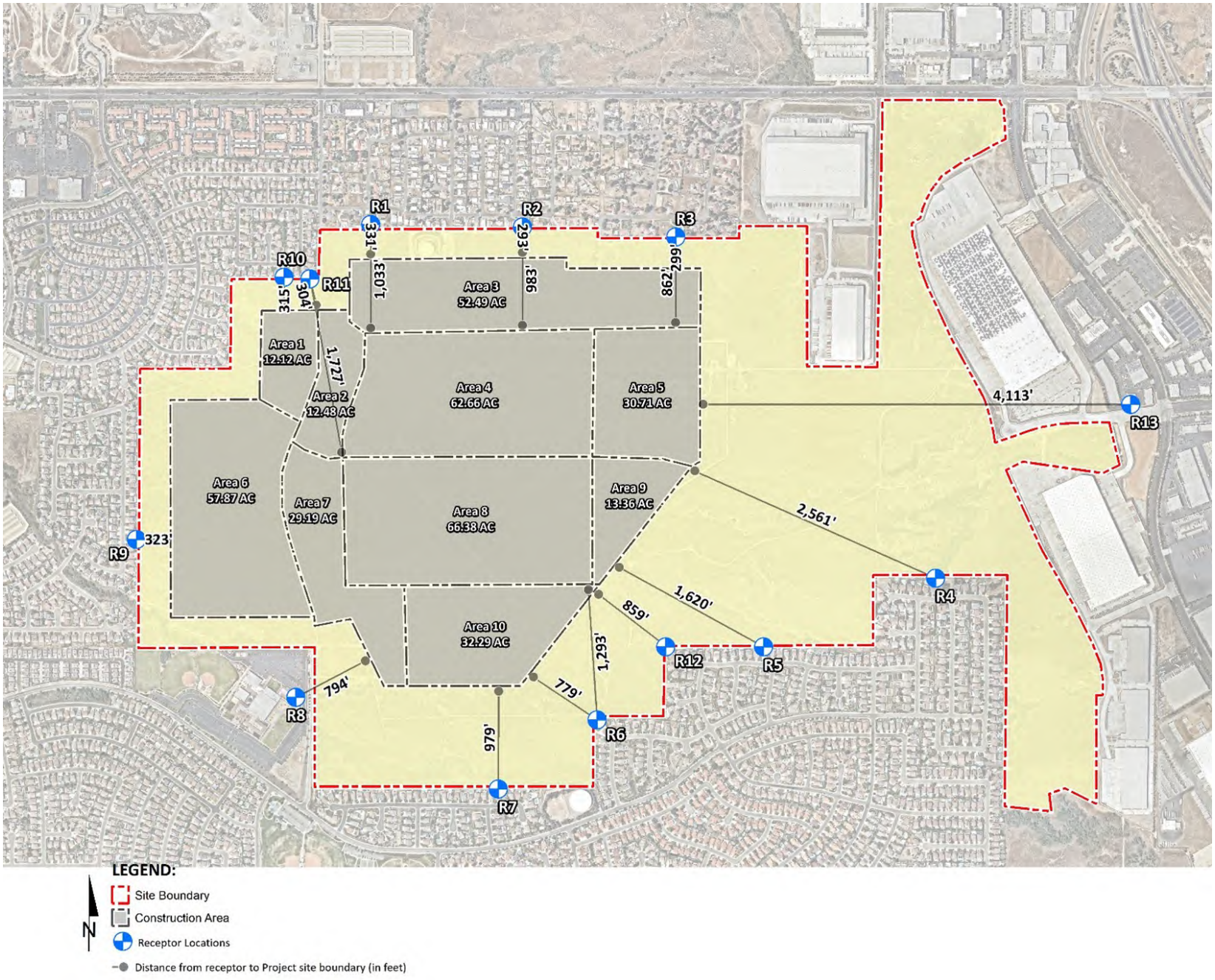

SOURCE: Urban Crossroads, 2023

FIGURE 4.2-1

Sensitive Receptor Locations

West Campus Upper Plateau EIR

DUDEK

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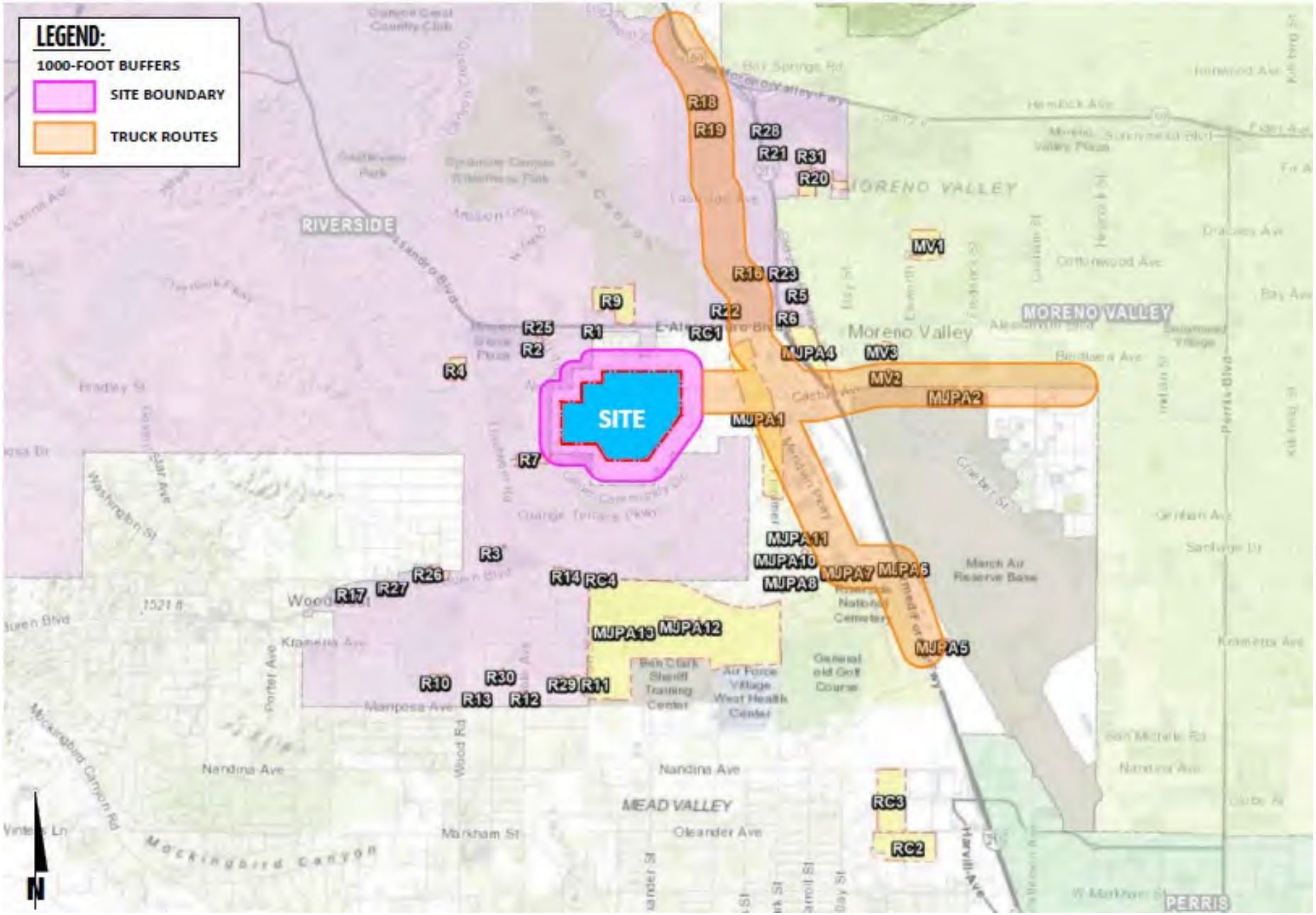

SOURCE: Urban Crossroads, 2023

FIGURE 4.2-2

Projects Related to Cumulative TAC Impacts

West Campus Upper Plateau EIR

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4.8 Hazards and Hazardous Materials

This recirculated section describes the existing hazardous materials within the vicinity of the proposed West Campus Upper Plateau Project (Project), identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures for implementation of the Project.

In addition to the documents listed in Section 4.8.9, References Cited, the following reports were used in the preparation of this section of the EIR:

- Phase I Environmental Site Assessment Meridian – West Campus Upper Plateau, prepared by Leighton Consulting Inc., October 28, 2021 (Phase I, Appendix J-1)
- Phase II Environmental Site Assessment Meridian – West Campus Upper Plateau, prepared by Leighton Consulting Inc., January 17, 2022 (Phase II, Appendix J-2)
- Finding of Suitability to Transfer, Parcels F and K-1, March Air Force Base, September 20, 2000, and Quitclaim Deed for Parcel F and K-1 between the U.S. Air Force and March Joint Powers of Authority, February 28, 2001 (Appendix J-3)
- Wildlife Hazard Review, prepared by Mead & Hunt, July 28, 2022 (Appendix J-4)
- Hazardous Material (PCB/Treated Wood Waste) Investigation Report – Meridian West Campus Upper Plateau, prepared by Leighton Consulting Inc., May 5, 2022 (Appendix J-5)
- Supplemental Environmental Assessment Report – Meridian West Campus Upper Plateau, prepared by Leighton Consulting Inc., November 3, 2023 (2023 Leighton Report, Appendix J-6)
- Fire Protection Plan – West Campus Upper Plateau, prepared by Dudek (Appendix Q)
- Federal Aviation Administration - Determinations of No Hazard to Air Navigation for Buildings B and C, April 29, 2022 (FAA 2022a–h).

As discussed in detail in Chapter 3, Project Description, of this EIR, the Specific Plan outlines the land uses planned for the Project area, and this Draft EIR assumes the following buildout of the Development Area for analysis:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1, 280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facilities – 2.84 acres for future sewer lift station and electrical substation

The proposed Project also includes the establishment of a 445.43-acre Conservation Easement in compliance with the Center for Biological Diversity (CBD) Settlement Agreement (Appendix S).

4.8.1 Existing Conditions

Definitions and Background

Hazardous Materials

A hazardous material is defined as any material that, because of quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment (California Health and Safety Code section 25501[n]). The term "hazardous materials" refers to both hazardous substances and hazardous wastes. Under federal and state laws, any material, including wastes, may be considered hazardous if it is specifically listed by statute as such or if it is toxic (causes adverse human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), or reactive (causes explosions or generates toxic gases).

Hazardous wastes are hazardous substances that no longer have practical use, such as materials that have been spent, discarded, discharged, spilled, contaminated, or are being stored until they can be disposed of properly (22 CCR 66261.10). Soil that is excavated from a site containing hazardous materials is a hazardous waste if it exceeds specific criteria established in sections 66261.20 through 66261.24 of the CCR Title 22. Hazardous substances are regulated by multiple agencies, as described in the Regulatory Setting below, and cleanup requirements of hazardous releases are determined on a case-by-case basis according to the agency (e.g., Department of Toxic Substances Control [DTSC] or State Water Resources Control Board) with lead jurisdiction over a contaminated site.

Potential Receptors/Exposure

The sensitivity of potential receptors in the areas of known or potential hazardous materials contamination is dependent on several factors, the primary factor being the potential pathway for human exposure. Exposure pathways include external exposure, inhalation, and ingestion of contaminated soil, air, water, or food. The magnitude, frequency, and duration of human exposure can cause a variety of health effects, from short-term acute symptoms to long-term chronic effects. Potential health effects from exposure can be evaluated in a health risk assessment. The principal elements of health risk assessments typically include:

- Evaluation of the fate and transport processes for hazardous materials at a given site;
- Identification of potential exposure pathways;
- Identification of potential exposure scenarios;
- Calculation of representative chemical concentrations; and
- Estimation of potential chemical uptake.

Hazardous Building Materials Associated with Demolition

Older buildings and structures can contain building materials that include hazardous components such as lead-based paint (LBP) and asbestos-containing materials (ACMs). The existing structures and bunkers on the Project Site are relatively old, approximately 60 years, therefore the potential exists for the structures to contain hazardous building materials (Appendix J-1).

Among its numerous uses and sources, lead can be found in paint, water pipes, solder in plumbing systems, and in soils around buildings and structures painted with LBP. Old peeling paint can contaminate near surface soil, and exposure to residual lead can have adverse health effects, especially in children. LBP was phased out in the United States beginning with the passage of the Lead-Based Paint Poisoning Prevention Act in 1971. Prior to the U.S. Environmental Protection Agency (EPA) ban in 1978, LBP was commonly used on interior and exterior surfaces of buildings. Structures built prior to 1978 may have LBP and some paints manufactured after 1978 for industrial or marine uses legally contain more than 0.06% lead. Pathways of exposure to lead can occur through inhalation, ingestion, dermal absorption, or absorption from retained/embedded leaded foreign body. Exposure to lead can adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems, and the cardiovascular system, and affects the oxygen carrying capacity of blood. Children are particularly susceptible to potential lead-related health problems because it is easily absorbed into developing systems and organs.

Asbestos, a naturally occurring fibrous material, was used as a fireproofing and insulating agent in building construction before such uses were terminated due to liability concerns in the late 1970s. From 1973 through 1990, several laws were passed banning the manufacture and use of ACM (EPA 2021a). Some materials are still allowed to contain asbestos. The demolition of structures with ACM can result in airborne fibers. Inhalation of the tiny asbestos fibers can lead to lung disease. Structures that predate 1981 and structural materials installed before 1981 are presumed to potentially contain asbestos. Because it was widely used prior to the discovery of its health effects, asbestos can be found in a variety of building materials and components such as insulation, walls and ceilings, floor tiles, and pipe insulation. Friable (easily crumbled) materials are particularly hazardous because inhalation of airborne fibers is the primary mode of asbestos entry into the body. Non-friable asbestos is generally bound to other materials such that it does not become airborne under normal conditions. Non-friable asbestos and encapsulated friable asbestos do not pose substantial health risks. Asbestos exposure is a human respiratory hazard. Asbestos-related health problems include lung cancer and asbestosis. Any activity that involves cutting, grinding, or drilling during building renovation or demolition or relocation of underground utilities could release friable asbestos fibers unless proper precautions are taken. Inhalation of airborne fibers is the primary mode of asbestos entry into the body, making friable materials the greatest potential health risk.

Spent fluorescent light tubes commonly contain mercury vapors, the exposure to which can have both long-term (e.g., anxiety, loss of appetite, fatigue, changes in vision or hearing) and/or short-term (e.g., sore throat, shortness of breath, chest pain, headache, vision problems) health effects. In February 2004, regulations took effect in California that classified all fluorescent lamps and tubes as hazardous waste. When these lamps or tubes are broken, mercury is released to the environment and can become airborne. When inhaled, mercury vapors can be absorbed through the lungs and into the bloodstream. Released mercury that is not vaporized can also be washed by rainwater and into waterways. Mercury switches may also be present in some buildings. A mercury switch (also known as a mercury tilt switch) is a switch which opens and closes an electrical circuit through a small amount of liquid mercury.

Polychlorinated biphenyls (PCBs) are organic oils that were formerly used primarily as insulators in many types of electrical equipment such as transformers and capacitors. After PCBs were determined to be carcinogenic in the mid-to-late 1970s, the EPA banned PCB use in most new equipment and began a program to phase out certain existing PCB-containing equipment (EPA 2021b). Fluorescent lighting ballasts manufactured after January 1, 1978, do not contain PCBs and are required to have a label clearly stating that PCBs are not present in the unit. PCBs are highly persistent in the environment, and exposure to PCBs has been demonstrated to cause cancer, as well as a variety of other adverse health effects on the immune system, reproductive system, nervous system, and endocrine system. The primary route of exposure to PCBs in the general population is the consumption of contaminated foods, particularly meat, fish, and poultry. Occupational exposure to PCBs occurs mainly through inhalation and dermal

contact routes. According to the Phase I site assessment, the Project site includes pole-mounted electrical transformer banks east of Buildings 2 and 4 (Appendix J-1).

Soil and Groundwater Contamination

The findings of the Phase I Environmental Site Assessment (Phase I) that was conducted for the ~~Project site~~ Specific Plan Area[1] determined that there were recognized environmental conditions (RECs) at the ~~site~~ Specific Plan Area (Appendix J-1). REC is a term used within the context of a Phase I and is defined as "(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment." (Appendix J-1). The numerous RECs identified ~~at~~ in the ~~Project site~~ Specific Plan Area triggered recommendations for further investigation at the site including a hazardous building material survey; collection of shallow soil samples at the "U-shaped feature," historical storage/cleared areas, water cooling tower, Building 2, beneath electrical transformers/equipment, and the undocumented granite stockpile; and a geophysical survey in the vicinity of a suspected underground storage tank (UST) and subsurface piping associated with the water cooling tower. The purpose behind these recommendations and conducting a Phase II Environmental Site Assessment was to determine whether the RECs and associated contaminants of concern related to these materials/suspected activities resulted in a past release of hazardous materials or wastes to the subsurface.

USTs are a common source of contamination for a number of reasons. Until the mid-1980s, most USTs were made of single-walled bare steel, which can corrode over time and result in leakage. Faulty installation or maintenance procedures can also lead to UST leakage, as well as to potential releases associated with spills. Recently revised UST regulations have significantly reduced the incidents of leakage and consequential soil and groundwater contamination from newer UST systems. Similarly, spills resulting from poor maintenance or improper installation associated with aboveground storage tanks (ASTs) can result in localized, shallow soil contamination. USTs installed prior to the mid-1980s that have leaked, as well as improperly installed USTs and ASTs that have resulted in fuel spills, can present contamination issues.

In addition, hazardous materials and waste associated with munitions storage and disposal could also be present in subsurface materials, especially within areas that have been used for disposal activities. Military munitions may potentially cause soil, groundwater and surface water contamination from munitions residues (including explosives and heavy metals) and may also present safety concerns around unexploded ordnance. Munitions residues can derive from partially detonated and decomposing ordnance and explosives from training activities, flares, smoke grenades, open burning and open detonation disposal activities, munitions burial sites, weapons testing or other military activities. The Project site includes areas that were used as part of the March Air Force Base operations for disposal of hazardous substances in undetermined quantities in areas that were then known as Installation Restoration Program (IRP) Sites, 3, 25, and 40. All of these IRP sites were located within the proposed Conservation Easement and outside of the ~~Development~~ Specific Plan Area. Remediation activities were completed at all three of these IRP Sites. Following completion of the remediation, the Air Force determined that all remedial actions to protect human health and the environment were taken and regulatory concurrence was provided by DTSC, Santa Ana Regional Water

[1] The Project Site boundary, as delineated in Figure 1 of the Phase I ESA (Appendix J-1) encompasses the Specific Plan Area in which the majority of development will occur including the Campus Development and Park. As confirmed by the 2023 Leighton Report (Appendix J-6), the Barton Street extension is included in the boundary of the Phase I and II investigations as well. The only infrastructure improvements that extend past the Site Boundary as defined in the Phase I ESA are the extensions of Cactus Avenue and Brown Street, which are addressed separately below.

Quality Control Board (RWQCB), and the EPA as documented in the Finding of Suitability for Transfer (Appendix J-3). As described below, the proposed extension of Cactus Avenue crosses over a small area of former IRP site 3 (Former Landfill No. 5). Further information regarding historical uses of the Project site and subsequent sampling, remediation, and characterization activities is included below.

Phase II Findings Project Site

Based on the results of the Phase I discussed above, a Phase II investigation was conducted on the ~~Project site~~ Specific Plan Area in order to further assess the potential presence of the RECs in subsurface materials and building materials that includes the ~~Development~~ Specific Plan Area and isolated areas of the Conservation Easement. The Phase II included the following sampling activities to address each REC noted in the Phase I.

- **Phase I Reported REC:**

  Building Hazardous Materials – A hazardous materials survey was recommended for all existing buildings, including the ordnance bunkers, a water tower, and a water cooling tower.

  Completed Phase II Sampling: A hazardous materials survey was completed at 7 buildings, 14 ordnance bunkers, 1 water tower, 1 water cooling tower, and other miscellaneous features. Where applicable, the surveys were for asbestos, lead-based paint, and Universal Waste Rule items. An inventory of treated wood poles was also completed.

- **Phase I Reported RECs:**

  U-Shaped Feature – From at least 1962 to 1989, a U-shaped feature (likely concrete pad) of an unknown use and associated access road existed near the northern edge of the Specific Plan Area. Limited shallow soil sampling (0–5 feet below ground surface [bgs]) focused around its southern, western, and northern edges was recommended.

  Historical Storage/Cleared Areas– During the late 1940s and 1950s there were various historical areas that were cleared, used for storage, or had former small buildings at several locations in the central portions of the Specific Plan Area. These areas are a concern, and limited shallow soil sampling (0–5-feet bgs) was recommended.

  Completed Phase II Sampling: A total of 17 exploratory trenches were completed in the area of the U-shaped feature and other historical areas of concern. The exploratory trenches were generally completed to approximately 5 feet bgs, and soil samples were collected at several depth intervals (typically 0.5, 2.5 and 5 feet bgs) in each trench.

- **Phase I Reported RECs:**

  Potential UST Vent Line – A potential UST vent line was observed on the exterior northern wall of Building 1. Further investigation of this feature was recommended via a geophysical survey.

  Water Cooling Tower – A water cooling tower was observed between Buildings 1 and 2 with evidence of subsurface piping. Limited shallow soil sampling around the base of this tower was recommended. Assessment of the subsurface piping run was also recommended (geophysical survey). The cooling tower itself may contain asbestos containing materials, and its material should be sampled in this regard.

  Building 2 – The interior of Building 2 contained three tanks of what appeared to be petroleum liquids and a large amount of process piping (both above the floor and in subgrade concrete-lined trenches) indicating

manufacturing processes involving liquids. The manufacturing piping and equipment, and evidence of liquid processes, was a concern, and assessment of the soils beneath this building was recommended.

Completed Phase II Sampling: In the area between Buildings 1 and 2, a geophysical survey was completed, as well as five exploratory trenches around the water cooling tower. In the area of Building 2, three slant soil borings were completed adjoining/beneath the building. The exploratory trenches were completed to approximately 3.5 feet bgs, and soil samples were collected at approximately 0.5, 2, and 3.5 feet bgs. The slant soil borings were drilled to depths of 15 to 30 feet, with soil sampling conducted at 5-foot depth intervals.

- **Phase I REC:**

  Electrical Transformers/Equipment – Pole-mounted electrical transformer banks were observed east of Buildings 2 and Building 4, with the empty transformer cans on the ground, indicating they may have been scavenged for metals. Also, west of Building 5 are two large pad-mounted electrical transformers, with evidence of leakage onto the soil adjoining one of them. The interior of Building 5 also contains large scale electrical distribution equipment that appears many decades old. Shallow soil sampling for PCBs was recommended near all of the above-mentioned features. At the interior of Building 5, this soil sampling may be substituted with wipe samples of the concrete flooring near the electrical switching equipment. Selected soil samples analyzed for PCBs should also analyzed for total petroleum hydrocarbons (TPH) and Title 22 Metals.

  Completed Phase II Sampling: Five exploratory trenches were completed at two electrical substation areas that had multiple former elevated electrical transformers (adjoining Building 2 and Building 4). Two exploratory trenches were also completed near pad-mounted transformers (adjoining Building 5 and at northeast edge of the Ordnance Storage Bunkers Area).

- **Phase I REC:**

  Undocumented Stockpile – A decomposed granite stockpile was located on the western portion of the Specific Plan Area. No staining or odors were observed (Appendix B of the Phase I ESA – Photo no. 33). The source of this stockpile was unknown. Limited sampling of this stockpile was recommended before the materials are disturbed or used.

  Completed Phase II Sampling: Three soil samples were collected from the decomposed granite stockpile of unknown source.

- **Phase I REC:**

  Wood Poles – Numerous treated wood utility poles exist at the Specific Plan Area. A specific count was not completed; however, it was likely more than 200. Some of the poles appear to be used for communications (antenna), while most are for facility lighting and electrical distribution. Some of the electrical distribution poles contain small pole-mounted transformers. It was recommended first that an inventory be completed of the approximate number and types of poles. A plan then should be developed for the representative sampling of treated wood from these poles, as well as the soil beneath those with electrical transformers (for PCBs). This can then provide the basis for a plan for the proper disposal of the poles themselves, as well as any potential PCB impacted soils beneath them.

  Completed Phase II Sampling: An inventory of wooden poles was completed, and a recommended plan provided for representative sampling of the wood and underlying soil/hardscape beneath those poles with electrical transformers.

As detailed above, t~~T~~he Phase II included a hazardous materials survey completed at 7 buildings, ~~16~~ 14 ordnance bunkers, the non-operational water tower, one water cooling tower, and other on-site features; 17 exploratory trenches in the U-shaped feature and other historical areas of concern; a geophysical survey and 5 trenches around the water cooling tower; 5 exploratory trenches at two electrical substation areas that had multiple former elevated electrical transformers and two trenches near pad-mounted transformers; 3 soil samples collected for analysis from the decomposed granite stockpile; and an inventory of wooden poles and preparation of a sampling plan.

Soil samples were collected from the trenches that extended approximately 5 feet below ground surface and some soil samples were also collected with hollow stem auger borings. The samples were analyzed for ~~total petroleum hydrocarbons (~~TPH~~)~~, semi-volatile organic compounds (SVOCs), organochlorine pesticides (OCPs), chlorinated herbicides (CHs) polychlorinated biphenyls (PCBs), and Title 22 metals. The hazardous building survey evaluated building materials for the presence of asbestos and lead-based paint. The results were as follows:

- **TPH** – No TPH was reported in 40 of 49 soil samples and the 9 remaining samples showing hydrocarbons in the diesel range of petroleum with detections below regulatory commercial/industrial screening levels. A total of 4 samples also reported oil range TPH that were also below screening levels. As confirmed by the 2023 Leighton Report (Appendix J-6), all samples were below the conservative residential and construction worker screening levels as well.
- **SVOCs** – 26 of 29 soil samples reported no detections of SVOCs. Minor concentrations of 10 SVOCs (acenaphthylene, benzo(a)anthracene, benzo (b) fluoranthene, benzo (g,h,i) perylene, butylbenzylphthalate, chrysene, fluoranthene, fluorine, phenanthrene and pyrene) were reported in the three remaining samples, all at concentrations below existing regulatory screening levels for soil in a commercial/industrial use scenario. As confirmed by the 2023 Leighton Report (Appendix J-6), all samples were below residential and construction worker screening levels as well.
- **OCPs** (pesticides) – No detections in 17 of 20 samples analyzed and the detections in the three remaining samples were relatively minor at levels below regulatory screening levels. As confirmed by the 2023 Leighton Report (Appendix J-6), all samples were below residential and construction worker screening levels as well.
- **PCBs –** No detections in 38 of 39 samples with the one detection well below the commercial/industrial regulatory screening level. As confirmed by the 2023 Leighton Report (Appendix J-6), this detection was also below residential and construction worker screening levels.
- **CHs** (herbicides) – No detections in the 3 samples analyzed.
- **Asbestos –** No detections in the 4 soil samples analyzed (see below for results of asbestos in building materials).
- **Title 22 Metals –** Of the 48 samples analyzed, all detected metals were below regulatory screening levels except for arsenic. Although arsenic was above the regulatory screening levels, it was below what DTSC considers to be a background level for the region. As confirmed by the 2023 Leighton Report (Appendix J-6), all samples were below residential and construction worker screening levels as well.

~~In addition, t~~The geophysical survey noted ~~an anomaly~~ a square-shaped anomaly (approximately 15 × 15 feet) near the northern wall of Building 1, in relatively close proximity to a vertical pipe (i.e., suspected UST vent line) noted previously during the Phase I ESA. This anomaly was later investigated by excavating the area with a backhoe, and no evidence of a UST was found. The anomaly appears to have been caused by 3 to 5 feet thick of soil containing large cobbles and boulders in this area~~, but subsequent excavation did not find any evidence of an underground storage tank, only an area of large cobbles~~ (Appendix J-2).

The hazardous materials survey ~~which~~ included visual inspections, testing for lead-based paint, bulk sampling for asbestos, and PCBs and found the following:

- ACMs are present in numerous structures on the Project site.
- Testing of various painted, coated or glazed finishes indicates that there are lead-based paints at numerous locations on the Project site.
- Wipe samples collected within Buildings 2, 3, 4 and 5 indicate no identified PCBs.
- Metals were detected in all wipe samples collected and analyzed from Buildings 2, 3 and 5. Samples from Buildings 2 and 5 specifically indicated lead concentrations in excess of 40 micrograms per square foot, presenting a lead hazard, as defined in 8 CCR 1532.1 and 22 CCR 35000-36100.
- There are 42 pole-mounted transformers and a black electrical wrap present on power feeds coming down off of pole-mounted transformers and high power lines, which may be wrapped with a PCB-containing product called Askerals. There are also 29 small capacitors on the ground inside and outside Building 5, also a PCB concern.
- Universal Waste Rule items such as batteries, pesticides, mercury-containing equipment, lamps and aerosol cans were identified throughout the Site.
- Potential treated wood wastes were identified at the site including: 1) wood power poles, 2) wood perimeter fence lighting poles, 3) wood security lighting and camera poles, 4) large wood communication poles, and 5) treated wood utilized at power substations. Approximately 376 total wooden poles are present at the Project site.

A subsequent Hazardous Materials Survey was conducted at the site to provide an evaluation of the potential presence of PCBs and treated wood waste (Appendix J-5). This report determined that no PCBs were identified within the bulk samples collected of black electrical feed wire wrap, and only one of three samples collected of dielectric fluid in pole-mounted transformers had a detection of PCBs of 1.5 milligrams per kilogram (mg/kg), which is well below the regulatory standard of 50 mg/kg. The findings of the investigation for treated wood waste determined that the wood poles located throughout the facility contain chemical indications of being treated wood waste, which requires appropriate handling and disposal measures, as further outlined and discussed below.

Other Environmental Studies of the Project Site

The developed portion of the Specific Plan Area previously housed the March Air Force Base (AFB) Weapons Storage Area (WSA). Various environmental studies have been completed to ensure that the WSA is suitable for reuse. In addition to the Phase I and II activities summarized above, the 2023 Leighton Report (Appendix J-6) explains that the Air Force and March JPA thoroughly investigated the potential for radiological contamination in the former WSA.

In 1992, the EPA performed an aerial photographic analysis of March AFB, including the WSA. This analysis indicated that no burial sites within the WSA were identified (Cabrera 2006).

In 2000, Earth Tech Inc. completed a Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) Final Status Survey of the WSA. The MARSSIM indicated that "[b]ased on a review of the available records and documentation related to the WSA, the United States Air Force only stored weapons, and possibly non-conventional weapons, at the WSA while no non-conventional weapons maintenance activities or maintenance on unsealed sources of radioactive material were performed at the WSA. In addition, existing anecdotal information indicated that non-conventional weapons were stored at the WSA on a temporary or transient basis only, and not as a permanent presence" (EarthTech 2000). EarthTech's investigation included measurements of alpha and gamma

radiation inside 16 structures at the WSA that may have stored non-conventional weapons and confirmed the absence of radioactive contamination at the WSA. A confirmation survey completed by health physicists from the State of California Department of Health Services on June 14, 2000, confirmed the absence of radioactive contamination at the WSA. In a letter dated August 24, 2000, the Department of Health Services stated that it "is in concurrence that the buildings investigated in [the MARSSIM] meet the State's release criteria for unrestricted release" (DHS 2000).

In September 2006, Cabrera Services Inc. completed a Preliminary Assessment and Site Inspection (PA/SI) of the WSA. The stated objectives of the PA/SI were to (Cabrera 2006):

- Identify subsurface anomalies that could represent potential burial or disposal locations for weapons maintenance waste materials using non-invasive techniques
- Prioritize identified subsurface anomalies and make recommendations for additional investigations to confirm the presence of potential burial and disposal locations
- Identify surface areas with elevated levels of residual radioactivity that could represent buried wastes

Cabrera did not identify any radiologically impacted materials or burial pits and concluded that no further action for surface soils or subsurface investigation of burial sites in the WSA is recommended based on historical information and the results of geophysical, radiological, and subsurface investigations (Cabrera 2006).

The RWQCB reviewed Cabrera's PA/SI (2006) and responded as follows via a November 27, 2006, letter (RWQCB 2006):

> The investigation reviewed existing information and attempted to confirm any potential buried or disposal locations primarily using noninvasive techniques. Radiological surveys were also conducted to scan for surface contamination. One anomalous area was investigated utilizing test pits. No further action for subsurface investigation of burial sites was recommended, based on historical information and the results of the investigation.
>
> We concur with your finding of no release at the site, and the recommendation for no further action for the Weapons Storage Area.

This finding is consistent with the U.S. Air Force (USAF) Final Comprehensive Site Evaluation Phase I Report for its Military Munitions Response Program dated March 2013 (USAF MMRP). That evaluation noted that the WSA was used for "nuclear weapon storage only" and concluded that further munitions response was not required. Munition response is defined as "Response actions, including investigation, removal actions, and remedial actions to address the explosives safety, human health, or environmental risks presented by unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC), or to support a determination that no removal or remedial action is required" (USAF 2013). No other areas of the March Air Reserve Base (ARB) were identified as storage, maintenance, or disposal areas for radioactive materials.

As further detailed in the 2023 Leighton Report (Appendix J-6), there is no evidence of the storage or disposal of biological or chemical weapons in the WSA.

IRP Site 30 is also identified on the Project site in Appendix J-3. Site 30 was previously a construction rubble burial site (AFCEC 2004). While there is no evidence that Site 30 ever operated as a landfill controlled by March AFB, it was noted that illegal dumping of domestic waste from the surrounding community had occurred there, including construction debris (AFCEC 2004). As noted in the Appendix J-3, "[n]o hazardous substances were identified at

Site 30 and no Comprehensive Environmental Response, compensation, and Liability Act (CERCLA) corrective actions were taken there."

Unexploded Ordnance (UXO)

A Final Comprehensive Site Evaluation Phase I Report was prepared for the USAF MMRP in March 2013. As identified therein, "[t]he goal of the USAF MMRP is to make munitions response areas (MRAs) safe for reuse and to protect human health and the environment. The USAF MMRP addresses issues related to munitions and explosives of concern (MEC) and munitions constituents (MC) associated with MRAs, as well as evaluates actual or potential hazardous substances, pollutants, or contaminants on defense sites other than operational ranges" (USAF 2013).

- Munitions and explosives of concern are defined as "military munitions that possess unique explosive risks including: 1) unexploded ordnance (UXO), 2) discarded military munitions (DMM), or 3) MC present in high enough concentrations to pose an explosive hazard" (USAF 2013). MC is further defined as "any materials originating from UXO, DMM, or other military munitions, including explosive and non-explosive materials, and emission, degradation, or breakdown elements of such ordnance or munitions. The primary concerns with MC are human health and ecological hazards" (USAF 2013).
- Munition Response is defined as "Response actions, including investigation, removal actions, and remedial actions to address the explosives safety, human health, or environmental risks presented by unexploded ordnance (UXO), discarded military munitions (DMM), or munitions constituents (MC), or to support a determination that no removal or remedial action is required" (USAF 2013).
- USAF conducted a conceptual site evaluation based on a review of historical information, site visits, and interviews. The purpose of the conceptual site evaluation was "to identify areas where past military munitions activities or potential [munitions response areas] MRAs associated with March ARB may pose a risk to human health or to the environment" (USAF 2013). USAF considered an inventory of range-related activities that included all activities associated with the potential use, storage, and disposal of military munition. On the Project site, USAF identified the following areas as having known or suspected range-related activities, as shown in Figure 4.8-1, USAF Investigation Sites:
    - Area 22: the former ordnance storage area (WSA)
    - Area 20: Installation Restoration Programs Site 25
    - Area 23: suspected TNT rinsate ponds
    - Portion of Area 21: Demolition Area (ammunition disposal)

Areas 22 and 23 were identified as a munitions storage area (the former WSA), while Areas 20 (also referred to as Site 25) and 21 were identified for possible munitions disposal. Note that Area 21 only overlaps very slightly onto the Project site, but primarily consists of the area containing Grove Community Church and Preschool and nearby residential uses.

These sites were further evaluated to determine whether they required a further munitions response (i.e., qualified as an MRA). Sites were qualified as having potential for further munition response (potential MRA) for several reasons, including if the site location can be identified, if the site is owned by the U.S. Department of Defense, if the site's existence is supported by data, or if records of munitions use on the site are identified.

Potential MRAs were identified to be ineligible for USAF MMRP for several reasons, including if the site is an active or operational munitions area or range; is previously identified as a formerly used defense site; contained a small arms

range that was completely indoors; is more appropriately managed under another program, such as Formerly Used Defense Sites or Environmental Restoration Program; or is more appropriately managed under another service MMRP.

USAF determined further munitions responses were not required for Areas 20 and 22 because they had been addressed by earlier clean up actions, referred to as "Installation Restoration Programs" or "IRPs" in the report. Further munition response was not required for Area 23 because "[b]ased on review of the historical data, the existence of the Suspected TNT Rinsate Ponds could not be confirmed." These rinsate ponds were suspected to exist in the same areas as Landfill No. 5 (Area 3), which has been extensively remediated and investigated by the USAF, with oversight from numerous regulatory agencies. Finally, further munition response was not required in Area 21 (Grove Community Preschool) because it was addressed under the Formally Used Defense Sites Program, Project No. J09CA00110, "and is used by children as a play area with a residential area across the street" (USAF 2013).

Based on this report, the USAF has not identified any areas within the Specific Plan Area that require further munitions responses.

Prior to the release of the Draft EIR, Robert Estrada, the Base Realignment And Closure environmental coordinator, former March AFB, California, researched the need for a UXO survey of the Project site, including all areas that would potentially be disturbed by Project construction activities. In an email dated May 4, 2022, he concluded that "there is no basis to conduct any response action, including UXO survey at Parcels K-1 and F" (Estrada, pers. comm., 2022). These parcels encompass the entire Project site, including the conservation easement areas, and are identified in Exhibit B to the Quitclaim Deed included in Appendix J-3 to the Draft EIR.

Infrastructure Improvements

As noted in the Phase I ESA, the Phase I ESA covers the primary area of the Project site that will be developed (the Campus Development and Park). As confirmed by the 2023 Leighton Report (Appendix J-6), the Barton Street extension is included in the boundary of the Phase I and II investigations as well. The only infrastructure improvements that extend past the site boundary as defined in the Phase I ESA are the extensions of Cactus Avenue and Brown Street. Figure 4.8-1 shows the approximate extent of former Landfill No. 5, over which a small portion of the proposed extension of Cactus Avenue crosses slightly.

These street extensions are addressed in the 2023 Leighton Report. As provided in that report (Appendix J-6),

> a small portion of the proposed Cactus Ave. extension may extend over Area 3 -former Landfill No. 5. Landfill 5 is not a current landfill, but a former landfill that was remediated in 1995 and 1996 by the removal of 223,200 cubic yards of landfilled materials and soil. Reports on confirmation sampling, conducted after the removal action, indicate it was cleaned up to levels protective of human health and the environment. This area was then reported to have been restored by backfilling with clean soil and revegetating the site. No restrictions on land use were required following these remediation efforts (Air Force Civil Engineering Center (AFCEC), 2004). In summary, because former Landfill 5 was removed, it cannot be disturbed by the proposed roadway extension activities.

In May 2022, the USAF prepared a Final Quality Program Plan (QPP) for the Remedial Investigation of PFAS at the Former March AFB and March ARB (the PFAS QPP). The PFAS QPP was conducted to "[d]etermine the nature and extent of PFAS (perfluorooctane sulfonate [PFOS], perfluorooctanoic acid [PFOA], and perfluorobutane sulfonic acid [PFBS]) in soil and groundwater" (AFCEC 2022) at the March AFB. The PFAS QPP was reviewed and approved by

the EPA, the RWQCB, and the California Department of Toxic Substances Control. In connection with the PFAS QPP, a preliminary assessment was conducted to determine the potential release locations of PFAS at the March ARB as a result of USAF operations. The preliminary assessment determined that the only potential release location within the Project site was the West March Aqueous Film-Forming Foams (AFFF) Area Landfill No. 5, which is also known as and referred to as Area 3.

The USAF collected groundwater, sediment, and surface water samples at Landfill No. 5 to screen for potential residual PFAS compounds. The sediment and surface water samples of Landfill No. 5 were reported to contain no PFAS compounds exceeding their reported screening levels (AFCEC 2022). Soil samples were collected from three locations within the former Landfill No. 5 and there were "[n]o detections of PFOA, PFOS, or PFBS above screening criteria" and, as such, "[n]o additional soil sampling is recommended" (AFCEC 2023). Sample location MARPSB010 is the closest sample location to the Cactus Avenue extension, and no PFAS was detected above the screening levels. As detailed in the Leighton 2023 Report (Appendix J-6), there is no evidence to indicate the proposed Cactus Avenue extension construction activities would create an unacceptable health risk to surrounding developments or future roadway users. Based on this information, there is no evidence that the proposed future roadway extensions (Cactus Avenue, Brown Street, or Barton Street) will create an unacceptable health risk to surrounding developments or future users of these roadway alignments.

Airports

The nearest airport to the Project site is the March Air Reserve Base/Inland Port Airport which is located just east of Interstate (I) 215 from the Project site. The primary runway for the airport (Runway 14-32) is located approximately 4,500 feet (0.85 miles) from the easternmost boundary of the Project site (Mead & Hunt 2014). According to the Land Use Compatibility Plan (ALUCP) for the Airport, the Project site is located within the C1 Primary Approach/Departure Zone and C2 Flight Corridor Zone. The ALUCP is primarily based upon the U.S. Air Force's Air Installation Compatibility Use Zones Study for March ~~Air Reserve Base (~~ARB~~)~~, dated August 2005. The ALUCP provides noise and safety policies governing development of compatible future land uses in areas within the airport influence area.

Wildfire

While wildfire risk is predominantly associated with wildland urban interface (WUI) areas, significant wildfires can also occur in heavily populated areas. The WUI is a general term that applies to development adjacent to landscapes that support wildland fire. The WUI, however, generally defines development areas that are located in the foothills and mountainous areas of California which does not characterize the Project site. Regardless, as presented in Figures 2a and 2b in Appendix Q, Riverside County Fire Hazard Severity Zones Map and CAL FIRE Fire Hazard Severity Zones Map, the Project Site was previously, however is no longer currently, located in an area designated by the Riverside County's General Plan Safety Element and CAL FIRE as a High Fire Hazard Severity Zone (HFHSZ) (CAL FIRE 2021). For more details about this change in designation, see Section 4.18, Wildfire.

4.8.2 Relevant Plans, Policies, and Ordinances

Federal

Department of Defense

The Department of Defense has developed the Air Installations Compatibility Use Zones (AICUZ) program to ensure that development is compatible with aviation operations in areas on and adjacent to military airfields. The AICUZ land use recommendations are based on land use compatibility with exposure to aircraft noise, and safety considerations. Recommended compatible land uses are derived from data on noise contours (noise zones) and safety zones (clear zones and accident potential zones).

The 2018 March ARB AICUZ Study is an update of the AICUZ study dated 2005. The update is a reevaluation of aircraft noise and accident potential related to Air Force flying operations and is designed to aid in the development of local planning mechanisms which will protect the public safety and health, as well as preserve the operational capabilities of March ARB. The update also provides noise contours based upon the Community Noise Equivalent Level (CNEL) metric and utilizes a planning noise contour. ~~The~~ A portion of the Project site is located within the 60 decibel (dB) and ~~70~~ 65 dB Noise Contour Level, and the remainder of the Project site is outside the 60 dB CNEL contour (Figure 4.10.1~~4 2 of March ARB 2018~~). Industrial, commercial, public/quasi-public, and open space land uses are considered compatible for noise contours less than 80 dB CNEL (parks are considered appropriate within 60-70 dB) (March ARB 2018).

Federal Toxic Substances Control Act and Resource Conservation and Recovery Act

The federal Toxic Substances Control Act of 1976 (15 USC 2601 et seq.) and the Resource Conservation and Recovery Act (RCRA) of 1976 (42 USC 6901 et seq.) established a program administered by the EPA for regulation of the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act (PL 98-616), which affirmed and extended the "cradle-to-grave" system of regulating hazardous wastes. The use of certain techniques for the disposal of some hazardous wastes was specifically prohibited by the Hazardous and Solid Waste Act Amendments of 1984. Under the authority of RCRA, the regulatory framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste, is found in Title 40 CFR, Parts 260–299.

Hazardous Materials Transportation Act

The U.S. Department of Transportation regulates hazardous materials transportation under Title 49 of the United States Code. State agencies with primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol and the California Department of Transportation. These agencies also administer permitting for hazardous materials transportation.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 USC 9601 et seq.), commonly known as "Superfund," was enacted by Congress on December 11, 1980. CERCLA provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party could be identified. CERCLA also enables

the revision of the National Contingency Plan, which provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants.

Oil Pollution Prevention

Oil Pollution Prevention regulations (40 CFR 112) require the preparation of a spill prevention, control, and countermeasure plan if oil is stored in excess of 1,320 gallons in aboveground storage (or if there is a buried capacity of 42,000 gallons). Spill prevention, control, and countermeasure (SPCC) regulations place restrictions on the management of petroleum materials and, therefore, have some bearing on hazardous materials management.

National Emission Standard for Asbestos

The National Emission Standards for Hazardous Air Pollutants (40 CFR 63) names ACM as a hazardous air pollutant. ACM use, removal, and disposal are regulated by the EPA under this law. In addition, this regulation requires notification of friable ACM removal prior to a proposed demolition project.

Superfund, Emergency Planning, and Community Right-to-Know Act

The Emergency Planning and Community Right to Know Act (40 CFR 350–372), establish four types of reporting obligations for facilities storing or managing specified chemicals: emergency planning, emergency release notification, hazardous chemical storage reporting requirements, and toxic chemical release inventory. The EPA maintains a database, termed the Toxic Release Inventory, which includes information on reportable releases to the environment.

Regional Screening Levels

The EPA provides regional screening levels (RSLs) for chemical contaminants to provide comparison values for residential and commercial/industrial exposures to soil, air, and tap water (drinking water). RSLs are a recommended, but not mandatory, approach to risk assessment for response actions at CERCLA sites. RSLs are available on the EPA's website and provide a screening level calculation tool to assist risk assessors, remediation project managers, and others involved with risk assessment and decision making. RSLs are also used when a site is initially investigated to determine if potentially significant levels of contamination are present to warrant further investigation. In California, the DTSC Human and Ecological Response Office (HERO) incorporated the EPA RSLs into the HERO human health risk assessment. HERO created Human Health Risk Assessment Note 3, which incorporates HERO recommendations and DTSC-modified screening levels based on the EPA RSLs. The DTSC-modified screening level should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

U.S. Department of Labor, Occupational Safety and Health Administration

Title 29 CFR, Part 1926 et seq. – Safety and Health Regulations for Construction

These standards require employee training; personal protective equipment; safety equipment; and written procedures, programs, and plans for ensuring worker safety when working with hazardous materials or in hazardous work environments during construction activities, including renovations and demolition projects and the handling, storage, and use of explosives. These standards also provide rules for the removal and disposal of asbestos, lead, LBP, and other lead materials. Although intended primarily to protect worker health and safety, these requirements also guide general facility safety. These regulations also require the preparation of an engineering survey prior to demolition.

Title 29 CFR, Part 1910 et seq. – Occupational Safety and Health Standards

Under these regulations, facilities that use, store, manufacture, handle, process, or move hazardous materials are required to conduct employee safety training, inventory safety equipment relevant to potential hazards, have knowledge on safety equipment use, prepare an illness prevention program, provide hazardous substance exposure warnings, prepare an emergency response plan, and prepare a fire prevention plan.

U.S. Department of Transportation

Title 49 CFR, Part 172, Subpart C – Shipping Papers

The U.S. Department of Transportation established standards for the transport of hazardous materials and hazardous wastes. The standards include requirements for labeling, packaging, and shipping hazardous materials and hazardous wastes, as well as training requirements for personnel completing shipping papers and manifests.

State

California Health and Safety Code

In California, the handling and storage of hazardous materials is regulated by Division 20, Chapter 6.95, of the California Health and Safety Code (Section 25500 et seq.). Under Sections 25500–25543.3, facilities handling hazardous materials are required to prepare a hazardous materials business plan. Hazardous materials business plans contain basic information about the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state.

Chapter 6.95 of the California Health and Safety Code establishes minimum statewide standards for Hazardous Materials Business Plans. Each business shall prepare a Hazardous Materials Business Plan (HMBP) if that business uses, handles, or stores a hazardous material (including hazardous waste) or an extremely hazardous material in disclosable quantities greater than or equal to the following:

- 500 pounds of a solid substance
- 55 gallons of a liquid
- 200 cubic feet of compressed gas
- A hazardous compressed gas in any amount (highly toxic with a Threshold Limit Value of 10 parts per million or less)
- Extremely hazardous substances in threshold planning quantities (19 CCR 2651)

In addition, in the event that a facility stores quantities of specific acutely hazardous materials above the thresholds set forth by California code, facilities are also required to prepare a risk management plan consistent with the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.). The risk management plan provides information about the potential impact zone of a worst-case release, and require plans and programs designed to minimize the probability of a release and to mitigate potential impacts.

California Office of Emergency Services

To protect the public health and safety and the environment, the California Office of Emergency Services is responsible for establishing and managing statewide standards for business and area plans relating to the handling

and release or threatened release of hazardous materials. Basic information on hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and the health risks) needs to be available to firefighters and public safety officers. Regulatory agencies are included in business plans to prevent or mitigate damage to the health and safety of persons and the environment from the release or threatened release of these materials into the workplace and environment. These regulations are covered under Chapter 6.95 of Division 20 of the California Health and Safety Code Article 1–Business and Area Plans (Sections 25500 to 25519) and Article 2–Hazardous Materials Management (Sections 25531 to 25543.3).

California Occupational Safety and Health Administration Under the California Occupational Safety and Health Act of 1973 (CCR Title 8), the California Occupational Safety and Health Administration (CalOSHA) is responsible for ensuring safe and healthful working conditions for California workers. CalOSHA assumes primary responsibility for developing and enforcing workplace safety regulations in Title 8 of the California Code of Regulations. CalOSHA hazardous substances regulations include requirements for safety training, availability of safety equipment, hazardous substance exposure warnings, and emergency action and fire prevention plan preparation. CalOSHA also enforces hazard communication program regulations, which contain training and information requirements, including procedures for identifying and labeling hazardous substances. The hazard communication program also requires that material safety data sheets be available to employees and that employee information and training programs be documented.

In CCR, Title 8, Division 1, Chapter 4, Subchapter 4, Construction Safety Orders, construction safety orders are listed and include rules for demolition, excavation, explosives work, working around fumes and vapors, pile driving, vehicle and traffic control, crane operation, scaffolding, fall protection, and fire protection and prevention, among others.

Asbestos

CalOSHA Asbestos and Carcinogen Unit enforces asbestos standards in construction, shipyards, and general industry. This includes identification and removal requirements of asbestos in buildings, as well as health and safety requirements of employees performing work under the Asbestos-In-Construction regulations (8 CCR 1529). Only a CalOSHA-Certified Asbestos Consultant can provide asbestos consulting (as defined by Business and Professions Code Sections 7180–7189.7 and triggered by the same size and concentration triggers as for registered contractors). These services include building inspection, abatement project design, contract administration, supervision of site surveillance technicians, sample collection, preparation of asbestos management plans, and clearance air monitoring.

Lead-Based Paint

The California Department of Public Health enforces lead laws and regulations related to the prevention of lead poisoning in children, prevention of lead poisoning in occupational workers, accreditation and training for construction-related activities, lead exposure screening and reporting, disclosures, and limitations on the amount of lead found in products. Accredited lead specialists are required to find and abate lead hazards in construction projects and to perform lead-related construction work in an effective and safe manner. Lead protections in construction activities are described in 8 CCR Section 1532.1.

Hearing Conservation and Personal Protective Equipment

A hearing conservation program is required to be administered by employers for employees that are exposed to noise above an 8-hour time-weighted average (TWA) of 85 decibels (dB) (8 CCR Section 5097). Additionally,

employers will make hearing protectors available to all employees exposed to the 8-hour TWA of 85 dB or greater at no cost to the employee.

California Hazardous Waste Control Act

The California DTSC is responsible for the enforcement of the Hazardous Waste Control Act (California Health and Safety Code, Section 25100 et seq.), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a state hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent than federal requirements. Although the Hazardous Waste Control Act is generally more stringent than RCRA, until the EPA approves the California hazardous waste control program (which is charged with regulating the generation, treatment, storage, and disposal of hazardous waste), both the state and federal laws apply in California, and hazardous waste reporting and regulation are enforced through California DTSC. The Hazardous Waste Control Act lists 791 chemicals and approximately 300 common materials that may be hazardous; establishes criteria for identifying, packaging, and labeling hazardous wastes; prescribes management controls; establishes permit requirements for treatment, storage, disposal, and transportation; and identifies some wastes that cannot be disposed of in landfills.

According to 22 CCR 66261.1 et seq., substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered hazardous waste. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, or contaminated, or that is being stored prior to proper disposal.

Toxic substances may cause short-term or long-lasting health effects ranging from temporary effects to permanent disability or death. For example, toxic substances can cause eye or skin irritation, disorientation, headache, nausea, allergic reactions, acute poisoning, chronic illness, or other adverse health effects if human exposure exceeds certain levels (the level depends on the substance involved). Carcinogens (substances known to cause cancer) are a special class of toxic substances. Examples of toxic substances include most heavy metals, pesticides, and benzene (a carcinogenic component of gasoline). Ignitable substances (e.g., gasoline, hexane, and natural gas) are hazardous because of their flammable properties. Corrosive substances (e.g., strong acids and bases such as sulfuric [battery] acid or lye) are chemically active and can damage other materials or cause severe burns upon contact. Reactive substances (e.g., explosives, pressurized canisters, and pure sodium metal, which react violently with water) may cause explosions or generate gases or fumes.

California State Aeronautics Act

The purpose of the California State Aeronautics Act, Public Utilities Code (PUC) Section 21001 et seq., administered by the California Department of Transportation, Division of Aeronautics, is "to protect the public interest in aeronautics and aeronautical progress." Under State Aeronautics Act, Airport Land Use Commissions are required, per PUC Sections 21670-21679.5, and must create Airport Land Use Compatibility Plans, pursuant to PUC Sections 21674.5 and 21674.7. Consistent with these provisions, the Riverside County Airport Land Use Commission has created an Airport Land Use Compatibility Plan for each airport under its jurisdiction. The March ARB/Inland Port ALUCP is discussed in greater detail under applicable local regulations.

California Accidental Release Prevention Program

Similar to the Community Right to Know Act, the California Accidental Release Prevention (CalARP) Program (19 CCR 2735.1 et seq.) regulates facilities that use or store regulated substances, such as toxic or flammable chemicals, in quantities that exceed established thresholds. The overall purpose of the CalARP Program is to prevent accidental releases of regulated substances and reduce the severity of releases that may occur. The CalARP Program meets the requirements of the EPA Risk Management Program, which was established pursuant to the Clean Air Act Amendments.

California Unified Program for Management of Hazardous Waste and Materials

Under the California Environmental Protection Agency (CalEPA), DTSC and Enforcement and Emergency Response Program administer the technical implementation of California's Unified Program, which consolidates the administration, permit, inspection, and enforcement activities of several environmental and emergency management programs at the local level. Certified Unified Program Agencies (CUPAs) implement the hazardous waste and materials standards. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The programs that make up the Unified Program are:

- Aboveground Petroleum Storage Act (APSA) Program
- Area Plans for Hazardous Materials Emergencies
- California Accidental Release Prevention (CalARP) Program
- Hazardous Materials Release Response Plans and Inventories (Hazardous Materials Business Plans, or HMBPs)
- Hazardous Material Management Plan (HMMP) and Hazardous Material Inventory Statements (HMIS)
- Hazardous Waste Generator and On-site Hazardous Waste Treatment (Tiered Permitting) Program
- Underground Storage Tank Program

The CUPA for the Project site is the Riverside County Department of Environmental Health.

Human Health Risk Assessment Note 3 – DTSC-Modified Screening Levels

Human Health Risk Assessment Note 3 presents recommended screening levels (derived from the EPA RSLs using DTSC-modified exposure and toxicity factors) for constituents in soil, tap water, and ambient air. The DTSC-modified screening level should be used in conjunction with the EPA RSLs to evaluate chemical concentrations in environmental media at California sites and facilities.

Environmental Screening Levels

ESLs provide conservative screening levels for over 100 chemicals found at sites with contaminated soil and groundwater. They are intended to help expedite the identification and evaluation of potential environmental concerns at contaminated sites. The ESLs are prepared by the staff of the San Francisco Bay RWQCB; the Santa Ana RWQCB (a regulatory agency with jurisdiction over environmental conditions on the March AFB) has not established any ESLs. While the San Francisco Bay RWQCB ESLs are not intended to establish policy or regulation, they can be used as a conservative screening level for sites with contamination. Other agencies in California may elect to use the ESLs; in general, the ESLs could be used at any site in the State of California, provided all stakeholders agree (SFBRWQCB 2019). In Dudek's recent experience, regulatory agencies throughout the state are using the San Francisco Bay RWQCB ESLs more frequently as regulatory cleanup levels. The San Francisco Bay RWQCB ESLs

are not generally used at sites where the contamination is solely related to a Leaking Underground Storage Tank (LUST); those sites are instead subject to the Low-Threat Underground Storage Tank Closure Policy.

California Department of Transportation/California Highway Patrol

Under Title 13, California Code of Regulations, Division 2, Chapter 6, California regulates the transportation of hazardous waste originating or passing through the state. The California Highway Patrol (CHP) and the California Department of Transportation have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies. CHP enforces materials and hazardous waste labeling and packing regulations that prevent leakages and spills of material in transit and provides detailed information to cleanup crews in the event of an incident. Vehicle and equipment inspection, shipment preparation, container identification, and shipping documentation are all part of CHP's responsibility. CHP conducts regular inspections of licensed transporters to ensure regulatory compliance. The California Department of Transportation has emergency chemical spill identification teams at locations throughout the state. Hazardous waste must be regularly removed from generating sites by licensed hazardous waste transporters. Transported materials must be accompanied by hazardous waste manifests.

California Code of Regulations

Most state and federal regulations and requirements that apply to generators of hazardous waste are identified in California Code of Regulations (CCR), Title 22, Division 4.5. Title 22 contains the detailed compliance requirements for hazardous waste generators, transporters, treatment, storage, and disposal facilities. As California is a fully authorized state pursuant to RCRA, most RCRA regulations, such as those contained in 40 CFR Part 260, et seq., have been duplicated and integrated into Title 22. However, since the California DTSC regulates hazardous waste more stringently than U.S. EPA, the integration of state and federal hazardous waste regulations that make up Title 22 do not contain as many exemptions or exclusions as RCRA. As with the California Health and Safety Code, Title 22 also regulates a wider range of waste types and waste management activities than do RCRA regulations in 40 CFR Part 260. To aid the regulated community, California compiled the hazardous materials, waste, and toxics-related regulations contained in CCR Titles 3, 8, 13, 17, 19, 22, 23, 24, and 27, into one consolidated CCR Title 26 "Toxics." However, the California hazardous waste regulations are still commonly referred to as Title 22.

Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under CEQA

In October 2022, the California Office of the Attorney General issued guidance (AG Guidance) outlining best practices for analyzing and mitigating wildfire impacts of development projects under the California Environmental Quality Act (CEQA).(California Office of the Attorney General 2022) The AG Guidance is intended to help local governments' evaluation and approval considerations for development projects in fire-prone areas, and to help project design in a way that minimizes wildfire ignition and incorporates emergency access and evacuation measures. The AG Guidance does not impose additional legal requirements on local governments, nor does it alter any applicable laws or regulations.

Local

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) regulates air quality in Riverside County. SCAQMD Rule 1403 governs work practice requirements for asbestos in all renovation and demolition activities, including

subsurface piping (transite pipe). The rule includes requirements for asbestos surveying, notifications, ACM removal procedures, schedules, handling and clean-up procedures, and storage, disposal, and landfill requirements for waste materials. All operators are also required to maintain records and use appropriate labels, signs, and markings. Rule 1403 incorporates the federal asbestos requirements found in the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 61, Subpart M. The EPA has delegated SCAQMD the authority to enforce the federal asbestos NESHAP.

SCAQMD Rule 1166 sets requirements to control the emission of VOCs from excavating, grading, handling, and treating VOC-contaminated soils. Under this rule, soil with has a VOC concentration equal to or greater than 50 parts per million (ppm) is considered "VOC Contaminated Soil" and must be handled in accordance with Rule 1166. Requirements under this rule include a VOC Contaminated Soil Management Plan, notifications, recordkeeping, monitoring, and handling procedures.

SCAQMD Rule 1466 sets requirements for control of particulate emissions from soils with toxic air contaminants. The provisions in Rule 1466 include ambient PM_{10} monitoring, dust control measures, notification, signage, and recordkeeping requirements.

Riverside County Department of Environmental Health

Riverside County Department of Environmental Health (DEH) is responsible for oversight of seven hazardous materials programs in the County: Aboveground Petroleum Storage Tanks, Accidental Release Prevention Program, HMBPs, Emergency Response, Underground Storage Tanks (USTs), Waste Generator, and Waste Treatment Programs. Riverside County DEH is duly authorized to conduct permitting, inspections, and enforcement actions associated with these state programs.

Riverside County DEH is also responsible for plan review prior to construction of certain projects. While Riverside County DEH only requires plan review for UST installation at new facilities, some cities and local jurisdictions require permit clearance from Riverside County DEH, meaning proof that plans are not required, prior to issuing permits and licenses. March Joint Powers Authority (JPA) permit applications require Riverside County review for new construction; however, all construction plans and permit applications are handled by March JPA's contract building department. Additionally, Riverside County DEH works with local planning departments during commercial property development to evaluate items such as on-site wastewater treatment, USTs, APSA, environmental assessment reviews, and hazardous materials disclosure.

March ARB AICUZ

In February 2018, March ARB released an update of the March ARB AICUZ Study dated 2005. This update was initiated because of the beddown[2] of new aircraft, operational changes and the introduction of new flight tracks. It is a reevaluation of aircraft noise and accident potential related to Air Force flying operations and is designed to aid in the development of local planning mechanisms which will protect the public safety and health, as well as preserve the operational capabilities of March ARB. The AICUZ program is a means to protect public health, safety, and general welfare in areas surrounding the base while seeking development compatible with the defense flying mission. The AICUZ for March ARB outlines the location of runway clear zones, aircraft accident potential zones, and noise contours and provides recommendations for development compatible with military flight operations.

[2] Beddown refers to the location of equipment or personnel at a certain location for more than one year.

March Air Reserve Base/Inland Port ALUCP

The March ARB/IP ALUCP was prepared for and adopted by the Riverside County ALUC on November 13, 2014. The purpose of the March ARB/Inland Port ALUCP is to promote compatibility between the March ARB/Inland Port and the land uses that surround the joint-use airport, to the extent such areas are not already devoted to incompatible uses. The March ARB/Inland Port ALUCP regulates future development of new residential dwellings, commercial structures, and other noise- or risk-sensitive uses within the Airport Influence Area based on factors enumerated in the ALUCP, including but not limited to noise, overflight, safety, and airspace protection. The Riverside County ALUCP Policy Document, which covers countywide policies, includes the policies for determining the land use compatibility of the Project since it is located within 2 miles of an airport runway. Policy 4.1.5, Noise Exposure for Other Land Uses of the Riverside County ALUCP requires that land uses demonstrate compatibility with the acceptable noise levels as shown on Figure 4.8-2~~1~~ (also depicted in Figure 4.11-8~~1~~ of Section 4.11, Noise, of this document).

March JPA General Plan

The Land Use Element and Safety/Risk Management Element of the March JPA General Plan (March JPA 1999) include policies related to safety risks for people residing or working in the Project area that will be applied to the Project. The following policies from the March JPA General Plan apply to the Project. Consistency with these policies is discussed in Section 4.10, Land Use and Planning.

Land Use Element

Policy 1.9: Plan for compatible land uses within the aircraft noise impact contours depicted in the Air Installation AICUZ Report for the airfield use.

Policy 6.2: Plan for compatible land uses within the Clear Zone, Accident Potential Zones I and II, as depicted in the AICUZ Report for the airfield use.

Policy 6.4: Ensure that plans and development do not conflict with the long-term needs of the Air Force Reserve in terms of encroachment, noise, accident zone, constraints, etc.

~~**Policy 7.2:** Ensure development and use of property within the vicinity of the airfield complies with appropriate building standards and codes, including height restrictions, restrictions on use, setbacks, population densities, insulation and materials, as contained within an approved Comprehensive Land Use Plan and appropriate AICUZ.~~

Safety and Risk Management Element

Goal 5: Reduce the potential for hazardous material exposure or contamination in the Planning Area

Policy 5.1: Comply with the enforcement of disclosure laws that require all users, producers, and transporters of hazardous materials and wastes to clearly identify such materials at the site, and to notify the appropriate County, State and/or Federal agencies in the event of a violation.

Policy 5.3: Ensure the storage, use and transportation of any hazardous material complies with the standards set forth within the errata sheets published for each substance.

Goal 7: Reduce the possible risk of upset, injury and loss of life, property damage, and other impacts associated with an aviation facility.

Policy 7.2: Ensure development and use of property within the vicinity of the airfield complies with appropriate building standards and codes, including height restrictions, restrictions on use, setbacks, population densities, insulation and materials, as contained within an approved Comprehensive Land use Plan and appropriate AICUZ.

In November 2023, March JPA released a Draft Environmental Justice Element (March JPA 2023). The March JPA Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the unincorporated territory within the County of Riverside. March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. The following goals and policies related to hazards and hazardous materials from the March JPA Draft Environmental Justice Element would apply to the Project (March JPA 2023) and are discussed in Section 4.10, Land Use and Planning:

HC 16.5 Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from uses that pose potential hazards to human health and safety.

HC 16.6 When developing and siting large scale logistics, warehouse and distribution projects, address the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019 and as may be subsequently amended.

HC 16.14 Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.

HC 16.15 Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.

HC 16.16 Apply pollution control measures such as landscaping, vegetation, and green zones (in cooperation with the SCAQMD) and other materials, which trap particulate matter or control air pollution.

HC 16.22 Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the Salton Sea and other standing bodies of water.

HC 16.23 Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.

HC 18.7 Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.

HC 18.9 Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.

a. Using design standards of the appropriate Specific Plan land use category.
b. Construction of structures in accordance with the requirements of March JPA's zoning, building, and other pertinent codes and regulations.
c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.
d. Use of drought tolerant landscaping that incorporates adequate drought-conscious irrigation systems.
e. Application of energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy.
f. Application of water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.
g. Encourage innovative and creative design concepts.
h. Encourage the provision of public art that enhances the community's identity, which may include elements of historical significance and creative use of children's art.
i. Include consistent and well-designed signage that is integrated with the building's architectural character.
j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.
k. Locate site entries and storage bays to minimize conflicts with adjacent residential neighborhoods.
l. Mitigate noise, odor, lighting, pollution exposure and other impacts on surrounding properties.
m. Provide and maintain landscaping in open spaces and parking lots.
n. As feasible, maximize landscape coverage with emphasis on drought-tolerant landscaping.
o. Preserve, as feasible, natural features, such as unique natural terrain, arroyos, canyons, and other drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems.
p. Require, as feasible, that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements.
q. Design parking lots and structures to be functionally and visually integrated and connected.
r. As feasible, site building access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity where such pass-through areas include wayfinding signage, street trees, grade and lateral separation from roads, all with consideration given to adequate safety lighting, and landscape screening.
s. Encourage safe and frequent pedestrian crossings and ensure that sidewalks and other pedestrian walkways provide continuity between land uses essential to a functional

lifestyle, and as needed such sidewalks and pedestrian walkways should provide sufficient lighting and signage to ensure public safety.

t. Encourage creation of a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety.

u. Recognize open space, including hillsides, arroyos, riparian areas, and other natural features as amenities that add community identity, beauty, recreational opportunities, and monetary value to adjacent developed areas.

v. Manage wild land fire hazards in the design of development proposals located adjacent to natural open space.

4.8.3 Project Design Features

Pursuant to the wildlife hazard review prepared for the Project, also known as a Bird/Wildlife Aircraft Strike Hazard (BASH) study, the following Project Design Features (PDFs) are incorporated into the Specific Plan to be consistent with Federal Aviation Administration guidance, the 2018 Air Installation Compatible Use Zone for March ARB (AICUZ), and the Riverside County ALUCP with regard to wildlife attractants and hazards to flight operations. Although the PDFs are already part of the Project, they will also be included as separate conditions of approval and included in the Mitigation Monitoring and Reporting Program. March JPA will monitor compliance through the Mitigation Monitoring and Reporting Program.

PDF-HAZ-1 As required by the Riverside County Airport Land Use Compatibility Plan (ALUCP), as detailed plans become available, they will be reviewed for consistency with the Riverside County ALUCP. In addition, the following conditions as a result of ALUC Development Review (File No. ZAP1515MA22, Appendix L) shall apply:

- Any new outdoor lighting that is installed shall be hooded or shielded so as to prevent either the spillage of lumens or reflection into the sky. Outdoor lighting shall be downward facing.
- A "Notice of Airport in Vicinity" shall be provided to all prospective purchasers and occupants of the property and be recorded as a deed notice. A copy of this notice is attached to the conditions for ALUC Development Review (File No. ZAP1515MA22).
- The Project has been conditioned to utilized underground detention systems, which shall not contain surface water or attract wildlife. Any proposed stormwater basins or facilities shall be designed and maintained to provide for a maximum 48-hour detention period following the design storm and remain totally dry between rainfalls. Vegetation in and around the basins that would provide food or cover for birds would be incompatible with airport operations and shall not be utilized in Project landscaping. Trees shall be spaced so as to prevent large expanses of contiguous canopy, when mature. Landscaping in and around the basin(s) shall not include trees or shrubs that produce seeds, fruits, or berries.

  Landscaping in the detention basin, if not rip-rap, should be in accordance with the guidance provided in ALUC "LANDSCAPING NEAR AIRPORTS" brochure, and the "AIRPORTS, WILDLIFE AND STORMWATER MANAGEMENT" brochure available at RCALUC.ORG which list acceptable plants from Riverside County Landscaping Guide or other alternative landscaping as may be recommended by a qualified wildlife hazard biologist.

A notice sign shall be permanently affixed to the stormwater basin with the following language: "There is an airport nearby. This stormwater basin is designed to hold stormwater for only 48 hours and not attract birds. Proper maintenance is necessary to avoid bird strikes". The sign will also include the name, telephone number or other contact information of the person or entity responsible to monitor the stormwater basin.

- Temporary construction equipment used during actual construction of the structure(s) shall not exceed the prescribed heights as identified in the aeronautical studies, unless separate notice is provided to the Federal Aviation Administration through the Form 7460-1 process.

PDF-HAZ-2 Stormwater management facilities will be designed such that any modifications to open channels or native flow lines do not support potentially hazardous wildlife through the incorporation of vegetation that could provide food, shelter, or nesting habitat for wildlife. Stormwater management facilities will also be consistent with Riverside County ALUCP Condition 4 related to stormwater management facilities and detention basins (see also PDF-HAZ-1).

PDF-HAZ-3 Solid waste that is stored on site for recycling and disposal will be contained in covered receptacles that remain closed at all times.

PDF-HAZ-4 Grading plan standards related to potential ditches, terrace drains, or other minor swales will require that seed mixes used for soil stabilizations are reviewed by a QAWB and revised as necessary to exclude the use of grains or other constituents that may attract potentially hazardous wildlife.

4.8.4 Thresholds of Significance

The significance criteria used to evaluate the Project impacts related to hazards and hazardous materials are based on March JPA's 2022 CEQA Guidelines. According to March JPA's 2022 CEQA Guidelines, a significant impact related to hazards and hazardous materials would occur if the Project would:

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

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

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

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

h) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

According to the Initial Study prepared for the Project (Appendix A), the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 miles of an existing or proposed school given that no schools are located within a 0.25-mile radius of the Development Area, resulting in no impact. However, it has been determined that the Grove Community Church, which is located near the southwest corner of the Project site, includes a preschool which is located within a quarter mile of the Project site. As such, the analysis below includes an evaluation of whether or not the proposed Project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Otherwise, the Project would not be located on a site that is included on a list of hazardous material sites, resulting in no impact (note that a Phase II Environmental Site Assessment was conducted at the site and is discussed in the context of significance criterion a) – Impact HAZ-1). Furthermore, it was determined within the Initial Study that the Project would result in a less-than-significant impact related to impairing the implementation of, or physically interfering with, an adopted emergency response plan or emergency evacuation plan. Accordingly, these issues are not analyzed in this section of the EIR. For details regarding these thresholds, please refer to Chapter 5, Effects Found Not to be Significant and the Initial Study included as Appendix A. For the purposes of this analysis, a significant hazard and hazardous materials impact would occur if the Project would:

HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

HAZ-2: 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.

HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

HAZ-4: For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area.

HAZ-5: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

4.8.5 Impacts Analysis

Threshold HAZ-1. ***Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Specific Plan Area

Campus Development

Construction

Project-related construction activities would include demolition and removal of existing buildings and structures within the Campus Development Area and use of hazardous materials during construction of new buildings, structures, and other features of the proposed Upper Plateau Campus. The potential for exposure of the public or the environment to hazardous materials during these construction activities is addressed below.

Exposure to Hazards in Existing Buildings

The proposed Project would include demolition of the existing buildings, ~~14~~ 12 of the former ordnance bunkers, the non-operational water tower, cooling tower, and appurtenances. Some of these structures are considered to be at least 60 years old and, as a result, could contain hazardous building materials. Exposure to hazardous building materials during demolition, including ACMs, LBP, or PCBs, mercury and other hazardous materials in structures would only occur during demolition activities, but could result in adverse health effects if not managed appropriately as required by existing laws and regulations. Once the structures have been removed, there would be no further exposure during operation of the proposed Project.

As described under Section 4.8.2, Relevant Plans, Policies, and Ordinances, existing federal, state, and local regulations require demolition or renovation activities that may disturb or require the removal of materials that consist of, contain, or are coated with ACM, LBP, PCBs, mercury, and other hazardous materials to be inspected and/or tested for the presence of hazardous materials. Further, all hazardous materials must be managed and disposed of in accordance with laws and regulations described in Section 4.8.2 and further described below.

The identification, removal, and disposal of ACM is regulated under 8 CCR 1529 and 5208. The identification, removal and disposal of LBP is regulated under 8 CCR 1532.1. For both ACM and LBP, all work must be conducted by a state-certified professional. A site-specific hazard control plan must be prepared and submitted to the appropriate agency detailing removal methods and specific instructions for providing protective clothing and equipment for abatement personnel (SCAQMD for asbestos and Cal/OSHA for lead). A state-certified LBP and an asbestos removal contractor would be retained to conduct the appropriate abatement measures as required by the plan. Wastes from abatement and demolition activities would be disposed of at a landfill(s) licensed to accept such waste. Once all abatement measures have been implemented, the contractor would conduct a clearance examination and provide written documentation to the March JPA that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of PCBs, the identification, removal, and disposal are regulated by the EPA under the Toxic Substances Control Act (TSCA) (15 USC 2601 et seq.) and California regulations (22 CCR 66263.44). Electrical transformers and older fluorescent light ballasts not previously tested and verified to not contain PCBs must be tested. PCBs were not detected above action levels, however the Phase II investigation noted that there are 42 pole-mounted

transformers and a black electrical wrap present on power feeds coming down off of pole-mounted transformers and high power lines, which may be wrapped with a PCB-containing product called Askerals (Appendix J-2). There are also 29 small capacitors on the ground inside and outside Building 5, that were considered to be a PCB concern (Appendix J-2). In accordance with TSCA and 22 CCR 66263.44, the materials, if confirmed to contain PCBs, must be disposed of at a licensed facility permitted to accept the materials. Phase II report findings could not make conclusive determinations on the presence of PCBs related to the 42 pole-mounted transformers and the black electrical wrap that may include a PCB-containing product called Askerals. However, a subsequent Hazardous Materials Survey was conducted at the site to provide a limited evaluation of the potential presence of PCBs and treated wood waste (Leighton Consulting Inc. 2022; Appendix J-5). This report determined that no PCBs were identified within the bulk samples collected of black electrical feed wire wrap and only one of three samples collected of dielectric fluid in pole-mounted transformers had a detection of PCBs which at 1.5 milligrams per kilogram was well below the regulatory standard of 50 mg/kg. The findings of the investigation for treated wood waste determined that the wood poles located throughout the facility were found to contain chemical indications of being treated wood waste which requires appropriate handling and disposal measures. Therefore, because of the potential for discovery of PCBs during construction and the presence of treated wood waste on site, this impact is considered potentially significant. **Mitigation Measure (MM) HAZ-1,** as outlined in Section 4.8.6, would require a contingency for further sampling and evaluation to confirm the presence or absence of PCBs, if suspected on site, and implementation of appropriate handling and disposal of treated wood waste. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the March JPA that any testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

In the case of mercury in fluorescent light tubes and switches, the identification, removal, and disposal are regulated under 22 CCR 67426.1 – 67428.1 and 66261.50. Under these regulations, the light tubes must be removed without breakage and disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor would provide written documentation to the March JPA that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations as would be required by implementation of **MM-HAZ-1**.

Existing abatement laws and regulations, combined with enforcement mechanisms by agencies including SCAQMD and Cal/OSHA require compliance with applicable federal, state, and local laws and regulations that would prevent the exposure of individuals and the environment to the hazards during demolition of structures built before newer regulatory requirements were enacted (1978 for lead-based paint and PCBs, 1981 for ACMs, and 2004 for mercury in fluorescent lighting), The proposed Project would involve demolition and removal of structures that could potentially contain hazardous building materials, however pursuant to federal, state, and local regulations, including HBMP programs overseen and enforced by the DEH, the demolition permit process would require appropriate surveying, identification and disposal of any identified hazardous building materials. Considering the limited scope of the hazardous building materials investigation and potential to discover suspect materials or releases of hazardous materials, this impact is considered potentially significant. **MM-HAZ-1,** as detailed in Section 4.8.6, is required to ensure that all suspect transformers and materials are evaluated for the presence of PCBs. Therefore, exposure to ACMs, LBP and/or other hazardous building materials that would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during Project construction would be **less than significant with mitigation incorporated**.

Exposure to Contaminated Soil or Groundwater

The Specific Plan would include ground disturbing activities during construction that could encounter soils and/or groundwater that has been contaminated from historical activities at the site. The Phase I Environmental Site

Assessment conducted for the Specific Plan Area determined that there were a number of Recognized Environmental Conditions (RECs), observations or documentation that points to the potential of a past release of hazardous materials or wastes to the subsurface, at the Specific Plan Area. If not understood and managed appropriately, future visitors or workers at the Project site could be exposed to ~~legacy~~ contaminants of concern (COCs) through contact with contaminated soils during excavation or other ground disturbing activities. The results of the Phase II investigation concluded that COCs ~~legacy contaminants~~ were ~~generally~~ not found above regulatory screening levels with the exception of arsenic, which, while above its regulatory screening level, was ~~. However, the concentration of arsenic was considered to be~~ below the background level for the region according to DTSC. In addition, as confirmed by the 2023 Leighton Report (Appendix J-6), all COCs were below residential and construction worker screening levels. No further soil sampling was recommended for the Specific Plan Area. As concluded in the 2023 Leighton Report (Appendix J-6), "[g]iven that all concentrations of analyzed compounds in the soil samples are well below the screening levels for hypothetical onsite construction workers or hypothetical on-site residential occupants, there is no indication of a likely unacceptable health risks to occupants of neighboring properties, related to these compounds and construction activities which are proposed." As also outlined in the 2023 Leighton Report and summarized above, based on the studies and characterization completed by the USAF, no part of the Specific Plan Area was a probable release location for PFAS, with the exception of Landfill No. 5, at which sampling revealed no detections of PFOA, PFOS, or PFBS above screening criteria. ~~h~~However, it was noted that construction activities could still encounter isolated areas with legacy contaminants or underground facilities, buried debris, waste drums, or tanks based on the past uses of the site. If not handled appropriately, this could represent a potentially significant impact. Implementation of **MM-HAZ-1,** as outlined in Section 4.8.6, would ensure that construction activities are observed by a qualified professional that would be able to identify any suspect subsurface materials that may require further evaluation and provide appropriate measures to ensure the safety of workers and the public. As a result, with implementation of **MM-HAZ-1**, exposure to contaminated soil or groundwater during construction would be **less than significant with mitigation incorporated.**

Use of Hazardous Materials During Construction

Construction activities would also likely require the use of limited quantities of hazardous materials such as fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These hazardous materials are typically packaged in consumer quantities and used in accordance with manufacturer recommendations and would be transported to and from the Project site. The improper handling and transport of hazardous materials could result in adverse health effects to workers or the public.

As discussed in Section 4.8.2, the transport of hazardous materials is regulated by the DOT and Caltrans. Together, federal and state agencies determine driver-training requirements, load labeling procedures, and container specifications designed to minimize the exposure of hazardous materials. In addition, businesses that use hazardous materials, including construction companies, are required to prepare and implement Hazardous Materials Business Plans (HMBPs) describing procedures for the handling, transportation, generation, and disposal of hazardous materials. As the Certified Unified Program Agency (CUPA), Riverside County DEH would be responsible for ensuring compliance with these regulations including, but not limited to, the Hazardous Waste Control Act, the Hazardous Waste Generator Program, the Hazardous Materials Release Response Plans and Inventory Program, the California Accidental Release Prevention Program, and the Aboveground Storage Tank Program.

This comprehensive set of federal, state, and local laws and regulations regulate the transportation, management, and disposal of hazardous materials and wastes so as to reduce the potential risks of human exposure. For these reasons, the potential for construction to result in a significant hazard due to exposure of the public or the

environment to hazardous materials or wastes through the routine transport, use, or disposal of hazardous materials would be **less than significant**, and no mitigation is required.

Operation

Under the Specific Plan buildout scenario analyzed in this Draft EIR, the Upper Plateau Campus would be developed with ten Business Park parcels, six Mixed Use parcels, three Industrial parcels, two Public Facilities parcels, and three open space parcels. These parcels would be created, designated, and graded. Buildings B and C would be constructed on two of the Industrial parcels. The remaining parcels would be developed with square footages as allowed under the Specific Plan. The use of hazardous materials would occur as part of the operation of the proposed Upper Plateau Campus. Land uses would include mixed use (retail and business park; no residential), business park, and industrial uses that have varying needs for the use, storage, and disposal of hazardous materials and wastes. Hazardous chemicals common in business park, retail and support settings include paints, lubricants, solvents, cleaning supplies and relatively small quantities of fuels, oils, and other petroleum-based products. Activities such as landscaping, can also become sources of releases of hazardous materials with pesticides and/or herbicides. Industrial land uses can have a wider range of hazardous materials and wastes that could be used as part of operations.

The industrial land uses would be required to prepare and submit a Hazardous Materials Management Plan and HMBP to the Riverside County DEH, as well as comply with any applicable fire code requirements as enforced by the County fire department. Facilities that generate waste would be regulated under the hazardous waste program and classified according to the volume of hazardous waste generated on site. The classification levels have accumulation time limits as well as other requirements for the safe storage, use, and disposal that can be found in CCR Title 22. A HMBP would include safety protocols for all hazardous materials that could be included in operations including storage requirements, employee safety training, and handling requirements. In addition, all hazardous materials handlers are subject to inspection every three years. The Riverside County DEH, as the CUPA, requires all industrial users to follow applicable regulations and guidelines regarding storage and handling of hazardous waste. All hazardous materials are required to be stored and handled according to manufacturer's directions and local, state and federal regulations including the Hazardous Waste Control Act (California Health and Safety Code Section 25100 et seq.), which is implemented by regulations described in CCR Title 22.

Business park and retail hazardous materials use are typically handled and transported in relatively small quantities, and because the health effects associated with them are generally not as serious as industrial uses, operation of these uses at the site would not cause an adverse effect on the environment with respect to the routine transport, use, or disposal of general office or retail hazardous materials. Any business that would store hazardous materials and/or waste at its site would also be required to submit business information and hazardous materials inventory forms contained in a Hazardous Materials Management Plan and HMBP.

The existing regulatory framework requires implementation of an HMBP that provides protocols for workers and includes appropriate storage and handling requirements. With adherence to existing regulatory requirements, the impact of the routine transport, use or disposal of hazardous materials associated with future uses at the Upper Plateau Campus would be a **less-than-significant impact**, and no mitigation is required.

Park

The proposed Project includes a 60.28-acre park west of the Barton Street extension under the Specific Plan buildout scenario. Park construction would involve more limited hazardous materials use and hazardous waste generation compared to the Upper Plateau Campus, however the same hazardous materials construction BMPs

and adherence to existing regulatory requirements would also apply to the Park construction. However, as above with the Specific Plan Area, construction activities could encounter previously unidentified contamination in isolated areas. For these reasons, the potential for the Park construction to result in a significant hazard due to exposure of the public or the environment to hazardous materials or wastes through the routine transport, use, or disposal of hazardous materials would be potentially significant and reduced to a **less-than-significant impact with implementation of MM-HAZ-1**.

During operation, very limited use of hazardous materials such as pesticides and herbicides could be part of maintenance activities. These uses would also be subject to existing regulatory requirements that would limit the potential for routine transport, use or disposal of hazardous materials associated with Park operation to a **less-than-significant impact,** and no mitigation is required.

Infrastructure Improvements

Infrastructure improvements associated within the proposed Specific Plan include installation of utility and roadway networks throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5 million gallon (MG) reclaimed water tank. The installation of utility and roadway networks, electrical substation, sewer lift station, and the majority of the reclaimed water lines are within the project site boundary of the Phase I and Phase II ESAs, which, as confirmed by the 2023 Leighton Report (Appendix J-6), indicated that no COCs on the Specific Plan Area exceed commercial industrial, residential, or construction worker screening levels. In addition, as further outlined in the 2023 Leighton Report (Appendix J-6), based on all environmental studies conducted at the Project site, there is no evidence that either the proposed future roadway extensions that extend beyond the Specific Plan Area (Cactus Avenue, Brown Street, or Barton Street) or construction of the reclaimed water tank and lines will create an unacceptable health risk to surrounding developments or future users of these roadway alignments. The new reclaimed water tank would consist of installation of an aboveground 0.5-million-gallon prefabricated, bolted steel tank on a poured concrete slab next to an existing water tank on an already disturbed and graded site. As discussed above for the Campus Development and Park, construction activities associated with the infrastructure improvements could encounter previously unidentified contamination but would otherwise be subject to the same regulatory requirements such that the potential for routine transport, use or disposal of hazardous materials associated with construction of these improvements would result in potentially significant impacts that would be reduced to a **less-than-significant impact with implementation of MM-HAZ-1.**

During operation, very limited use of hazardous materials such as cleaning supplies and solvents could be part of maintenance activities. These uses would also be subject to existing regulatory requirements that would limit the potential for routine transport, use or disposal of hazardous materials associated with operation of the infrastructure improvements to a **less-than-significant impact,** and no mitigation is required.

Conservation Easement

As described in Chapter 3 of this Draft EIR, Project Description, ~~The~~ March JPA and the developer propose to establish a Conservation Easement in compliance with the CBD Settlement Agreement (Appendix S). As noted in Section 4.8.1 above, the Conservation Easement was the location of former IRP Sites, 3, 25, and 40, and the subject of remediation for identified contamination. Following completion of the remediation, the Air Force determined that all remedial actions to protect human health and the environment were taken and regulatory concurrence was provided by DTSC, Santa Ana Regional Water Quality Control Board (RWQCB), and the EPA as documented in the Finding of Suitability for Transfer (Appendix J-3). Therefore, considering that previously identified contamination has

been sufficiently remediated and there would be no physical alteration to the Conservation Easement, there would be **no impact** with respect to the routine transport, use, or disposal of hazardous materials.

Threshold HAZ-2. ***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?***

Specific Plan Area

Campus Development

Construction

As noted above in Threshold HAZ-1, construction activities would require the use of limited quantities of hazardous materials that are part of normal requirements of the construction process, including fuels, oils, and lubricants for construction equipment; paints and thinners; and solvents and cleaners. These materials would be transported to and from the Specific Plan Area for use during construction activities. The improper handling and transport of hazardous materials could result in accidental release of hazardous materials, thereby exposing workers, the public or the environment to hazardous materials.

The transport of hazardous materials is regulated by the DOT and Caltrans. The transport regulations ensure safe transport of the regulated materials by addressing how hazardous materials are labeled, identifying approved transport routes, and include provisions that restrict containment during highway transportation of hazardous materials and wastes. Trucks would connect with the existing and established truck routes via Cactus Avenue and would thus comply with transport regulations.

Construction activities would disturb more than one acre and, thus, would be required to implement requirements of the NPDES General Construction Permit. This permit requires implementation of best management practices (BMPs) that would include measures to address the safe handling of hazardous materials, and in the unlikely event of an inadvertent release, also requires spill response measures to contain any release of hazardous materials. The use of construction BMPs implemented as part of a Storm Water Pollution Prevention Plan (discussed further in Section 4.9, Hydrology and Water Quality) as required by the NPDES General Construction Permit would minimize the potential adverse effects from accidental release of hazardous materials or wastes. These BMPs could include, but are not necessarily limited to, the following:

- Establishment of a dedicated area for fuel storage and refueling activities that includes secondary containment protection measures and spill control supplies;
- Requirements to follow manufacturer's recommendations on use, storage and disposal of chemical products used in construction;
- Avoidance of overtopping construction equipment fuel gas tanks;
- Proper containment and removal of grease and oils during routine maintenance of construction equipment; or
- Proper disposal of discarded containers of fuels and other chemicals.

In general, aside from refueling needs for heavy equipment, the hazardous materials typically used on a construction site would be brought onto the site by the construction contractor, packaged in consumer quantities, and used in accordance with manufacturer recommendations. The overall quantities of these materials on the site at any one time would likely not result in large bulk amounts that, if spilled, could cause significant soil or

groundwater contamination. If a spill of hazardous materials on the construction sites were to occur, the spilled materials would tend to be localized because of the relatively small quantities involved and would be cleaned up in a timely manner in accordance with identified BMPs.

Refueling activities of heavy equipment would be conducted in a dedicated and controlled area with secondary containment and protective barriers to minimize any potential hazards that might occur with an inadvertent release. Given the required protective measures (i.e., BMPs) and the quantities of hazardous materials typically needed for construction projects, including for the Specific Plan Area, the threat of exposure to the public or contamination to soil and/or groundwater from construction-related hazardous materials is considered a **less-than-significant impact**, and no mitigation is required.

Unexploded Ordnance

The Specific Plan Area is part of the former March Air Force Base and was used mostly for ordnance storage within the ~~16~~ 14 concrete bunkers built sometime in the 1950s or 1960s. According to the Phase I report, which focused on the proposed Specific Plan Area, the site was only used for the purpose of ordnance and munitions storage and not their disposal (Appendix J-1). However, to the south of the Specific Plan Area, an area known as Site 25, was the designated area for disposal and historically used for open air detonations, burning, and burial of munitions and munitions residue. Site 25 was the subject of a remediation effort in 1997 and was determined by the Air Force that all remedial actions taken were sufficient to protect human health and the environment (Appendix J-3). The determination that all remedial actions to protect human health and the environment was also supported by the March Air Force Base Operable Unit No. 2 Proposed Plan (September 1997), with concurrence letters from the DTSC, RWQCB, and the EPA.

In addition, as described in Section 4.8.1 above, the USAF MMRP, which addressed issues related to munitions and explosives of concern (including unexploded ordnance) and MCs associated with MRAs, evaluated actual or potential hazardous substances, pollutants, or contaminants on defense sites other than operational ranges. Based on the USAF MMRP, USAF concluded that there were no areas within the Specific Plan Area that require further munitions responses (USAF 2013). As also noted above, prior to the release of the Draft EIR, Robert Estrada, the Base Realignment and Closure environmental coordinator, Former March AFB, CA researched the need for a UXO survey of the Project site, including all areas that would potentially be disturbed by Project construction activities, and concluded that there was no basis to conduct any response action on the Project site (Estrada, pers. comm., 2022). As such, considering that the only earthwork activities would occur within the Specific Plan Area where munitions were primarily stored in concrete bunkers and the area where munitions were disposed, detonated, and buried has been remediated to the satisfaction of all overseeing regulatory agencies, the potential for adverse effects related to unidentified unexploded ordnance would be **less than significant,** and no mitigation is required**.**

Operation

Operation of the proposed Upper Plateau Campus facilities would involve the use of varying quantities of hazardous materials. The mixed use/commercial and business park land uses would likely involve relatively small quantities of common hazardous materials, including paints and thinners, cleaning solvents, and fuels, oils, and lubricants. These materials would be typically packaged in consumer quantities, as compared to bulk deliveries for industrial land uses, and used in accordance with manufacturer recommendations. Bulk hazardous materials could be associated with the proposed industrial land uses but these would also be subject to applicable federal and state regulations. All hazardous materials and waste storage, transport, usage, and disposal would be done pursuant to the provisions of programs administered by the Riverside County DEH. Storage of all hazardous materials on site,

including fuels, would be required to adhere to facility-specific HMBPs. Chapter 6.95 of Division 20 of the California Health and Safety Code requires the preparation and implementation of facility-specific HMBPs for any business including the proposed industrial land uses, and the HMBPs would identify safe measures to store, handle, and dispose of hazardous materials such that accident and upset conditions are minimized. The HMBPs would also include spill response measures to ensure that in the unlikely event that a release does occur, protocols would be implemented to contain and control any accidental release in a manner that is protective of human health and the environment. Such protocols could include employee training, the location of absorbent materials to contain a release, and notification requirements to ensure that human health and the environment is protected from any exposure. The adequacy of and compliance with the HMBPs would be overseen and enforced by the Riverside County DEH. Because a comprehensive set of enforced laws and regulations govern the transportation and management of hazardous materials to reduce the potential hazards to the public and environment, this impact for the operation of the Upper Plateau Campus would be **less than significant**, and no mitigation is required.

Park

Construction

Construction of the proposed Park would involve more limited hazardous materials use and hazardous waste generation compared to the Campus Development, however there would still likely be limited quantities of fuels, oils, and other hazardous materials used for the operation of machinery that if not managed appropriately could result in an unauthorized release. However, the same hazardous materials construction BMPs and adherence to existing regulatory requirements, as described above, would also apply to construction of the Park. For these reasons, the potential for upset and accident conditions related to hazardous materials use during Park construction would be **less than significant**, and no mitigation is required.

Operation

During operation, very limited use of hazardous materials such as pesticides and herbicides could be part of maintenance activities. These uses would also be subject to existing regulatory requirements as described above for the Campus Development that would limit the potential for upset and accident conditions of hazardous materials resulting in a **less-than-significant impact,** and no mitigation is required.

Infrastructure Improvements

Construction

As described above for the Campus Development and Park, construction activities associated with the infrastructure improvements would be subject to the same regulatory requirements such that the potential for upset and accident conditions of hazardous materials associated with construction of these improvements would result in a **less-than-significant impact,** and no mitigation is required.

Operation

Once constructed, the infrastructure improvements would not be associated with any substantive quantities of hazardous materials. The substation would require the use of transformer oil but all transformers would be equipped with spill containment areas and spill response supplies in accordance with OSHA requirements. All components would have a comprehensive spill response plan, in accordance with all applicable federal, state, and local regulations. Each enclosed transformer at the substation would include mineral oil, but secondary

containment would be provided in accordance with applicable federal, state, and local laws and regulations. The mineral oil contained in each transformer does not normally require replacement, and mineral oil disposal would be in accordance with all applicable federal, state, and local laws and regulations. Therefore, with adherence to all applicable federal, state, and local regulations, the potential for upset and accident conditions of hazardous materials associated with operation of the infrastructure improvements would be **less than significant,** and no mitigation is required.

Conservation Easement

The March JPA and the developer propose to establish a Conservation Easement in compliance with the CBD Settlement Agreement (Appendix S). No physical alteration to the Conservation Easement is anticipated and, as such there would be **no impact** with respect to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Threshold HAZ-3. ***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?***

Specific Plan Area

Campus Development

The existing Grove Community Church, located at 19900 Grove Community Drive and adjacent to the proposed extension of Barton Street, operates a preschool at its location which is housed in the southernmost portion of the Grove Community facility and south of the sanctuary. The preschool building, which is self-contained and accessed from the south side, is just over a quarter mile from the nearest proposed industrial use, but approximately 1100 feet southwest of the proposed mixed use land uses of the Campus Development. As discussed in Threshold HAZ-1 above, the proposed mixed-use developments would be required to prepare and submit a Hazardous Materials Management Plan and HMBP to the Riverside County DEH, as well as comply with any applicable fire code requirements as enforced by the County fire department to minimize the potential for any emissions or releases of hazardous materials. A HMBP would include safety protocols for all hazardous materials that could be included in operations including storage requirements, employee safety training, and handling requirements. The Riverside County DEH, as the CUPA, requires all entities that handle hazardous materials to follow applicable regulations and guidelines regarding storage and handling of hazardous waste as well as response to any inadvertent releases. Additionally, no traffic, including trucks, from the Campus Development will have access to Barton Street. All truck routes lead east and north from the Campus Development, in the opposite direction of the Grove Community Church. Nonetheless, even with adherence to these existing regulatory requirements, potential hazardous materials handled at these proposed mixed use developments could result in potentially significant impacts to the preschool at the Grove Community Church. As such, **MM-HAZ-2** prohibits facilities located within one-quarter miles of the existing school from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code 25532. Therefore, impacts would be reduced to a **less-than-significant impact with implementation of MM-HAZ-2.**

Park

For the proposed Park land uses, there would be very limited use of hazardous materials but could include limited use of pesticides and herbicides as part of maintenance activities. These hazardous materials uses would also be subject to existing regulatory requirements that would limit the potential for exposure to those in the immediate

vicinity and more limited for the community outside of the Park operation. Therefore, emissions of hazardous materials to schools within a quarter mile of the proposed Park area would be considered **less-than-significant impact,** and no mitigation is required.

Infrastructure Improvements

The proposed infrastructure improvements would not be associated with use of hazardous materials or waste and thus would have negligible emissions associated with them. Therefore, the potential impact to schools within a quarter mile would be considered a **less-than-significant impact**, and no additional mitigation is required.

Conservation Easement

The proposed Conservation Easement would include no physical construction and would have negligible emissions of hazardous materials or wastes associated with it. As such, ~~The potential~~ **no impacts** to schools from hazardous emissions would occur ~~be **less than significant**~~, and no mitigation is required.

Threshold HAZ-4. ***For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the Project area?***

Specific Plan Area

Campus Development

The Project site is located within the March ARB Land Use Compatibility Plan (ALUCP) and is in the C1 Primary Approach/Departure Zone and C2 ~~Compatibility~~ Flight Corridor Zones, which requires approval from the Airport Land Use Commission due to the Project site's proximity to the March ARB/Inland Port Airport. The C1 Zone is subject to high to moderate noise and moderate accident potential risk. Both C1 and C2 Compatibility Zones include safety requirements and restrictions within the policies of the ALUCP. While there are no residential components of the proposed Project, workers and visitors to the Project site could be exposed to excessive noise or safety hazards if not designed appropriately.

The C1 Zone is subject to moderate to high noise and moderate accident potential risk. The C2 Zone is subject to moderate noise and a moderate to low accident potential risk. As stated in Section 4.11, based on the ALUCP noise level contours for the March ARB/Inland Port Airport, the Upper Plateau Campus is located mostly between the 60 to 65 dBA CNEL noise level contour boundaries with only a limited portion at the northeast extreme of the Project site proposed for Open Space that falls within the 65 – 70 dBA CNEL contour and does not affect Campus Development. As stated in Section 4.11, Noise, the Project's mixed use, business park and industrial land uses are considered normally acceptable land uses since the Specific Plan Area is located either in an area encompassed by the 60 to 65 dBA CNEL contour, or outside of this contour (where airport noise levels would be less than 60 dBA CNEL). The very limited portion at the northeast extreme of the Project site that falls within the 65 – 70 dBA CNEL contour is proposed for Open Space designation, where no development would occur. As a result, the Project impacts were determined to be less than significant, and no further noise analysis was deemed necessary. Additionally, at its May 12, 2022 hearing, the Riverside County Airport Land Use Commission found the proposed Project to be conditionally consistent with the March ARB/IP ALUCP.

The ALUCP for the March ARB/Inland Port Airport also includes policies and safety requirements for proposed improvements located within Zones C1 and C2, which are summarized in Table 4.8-1 (Mead & Hunt 2014).

Table 4.8-1. ALUCP Policies and Safety Requirements for C1 and C2 Zones

Zone	Prohibited Uses	Other Development Conditions
C1	• Children's schools, day care centers, libraries • Hospitals, congregate care facilities, places of assembly • Noise-sensitive outdoor non-residential uses • Hazards to flight.	• Critical community infrastructure facilities discouraged • Aboveground bulk storage of hazardous materials discouraged • Sound attenuation as necessary to meet interior noise level criteria • Airspace review required for objects >70 ft. tall • Electromagnetic radiation notification • Deed notice and disclosure
C2	• Highly noise-sensitive outdoor non-residential uses • Hazards to flight	• Children's schools discouraged • Airspace review required for objects >70 ft. tall • Electromagnetic radiation notification • Deed notice and disclosure

Source: Table MA-2 from Mead & Hunt 2014.

All development associated with the proposed Project must adhere to the March ARB/Inland Port ALUCP and proposed plans that exceed airspace protection surfaces pursuant to the ALUCP would require review and approval from the Riverside County Airport Land Use Commission (ALUC) prior to approval of a building permit (RCALUC 2022). Conformity with the ALUCP policies is required to obtain a consistency determination from the ALUC and building permits from local jurisdictions. The Riverside County ALUC has reviewed the Project and found it to be consistent with the ALUCP provided that certain conditions as stipulated in their May 16, 2022 letter are met (RCALUC 2022).

In addition, in accordance with the wildlife hazard review that was prepared for the Project (Appendix J-4), **PDF-HAZ1** is incorporated to ensure that Project design plans and Project operations do not create wildlife attractants (e.g., food sources and habitat or nesting opportunities) that could create potential wildlife hazards to the aircraft operations of the March ARB. The incorporation of the recommended modifications identified in those PDFs would make the Specific Plan consistent with agency guidance, the 2018 March ARB AICUZ, and the Riverside County ALUCP with regard to potentially hazardous wildlife. See also Section 4.3, Biological Resources, for further analysis of aviation hazards related to wildlife and wildlife attractants and Section 4.10 for further discussion of compatibility with land use policies. The correspondence is also included within Appendix L of this EIR.

The proposed two industrial warehouse buildings (Buildings B and C) have also undergone FAA review for determination of potential hazard into air navigation space and were found to have no substantial adverse effects on the safe and efficient utilization of the navigable airspace by aircraft or on the operation of air navigation facilities (FAA 2022a–h). However, these two structures would still be required to adhere to the March ARB/Inland Port ALUCP and the conditional approval from the May 16, 2022, ALUC review and approval of plans consistent with **MM-HAZ-3**.

Therefore, with adherence to the March ARB/Inland Port ALUCP and the conditions identified from the required ALUC review and approval of proposed plans in accordance with the requirements of **MM-HAZ-3**, as outlined in Section 4.8.6, as well as incorporation of **PDF-HAZ-1** through **PDF-HAZ-4**, the potential safety hazards associated with the Upper Plateau Campus would have a **less-than-significant impact with mitigation incorporated** to people visiting or working in the Specific Plan Area.

Park

The proposed Park would also be located within the March ARB/Inland Port ALUCP within the C2 Zone. The improvements would be relatively minor compared to that of the Specific Plan Area but would still bring visitors to these areas where they could potentially be subject to noise and safety hazards from the March ARB/Inland Port Airport operations. The Park use is not prohibited or discouraged in the C2 Zone. The Park would be located outside the 60 CNEL contour, but regularly overflown in mostly daytime flight training. For safety hazards, as above, adherence to the March ARB/Inland Port ALUCP and the conditions identified from the ALUC review and approval process in accordance with the requirements of **MM-HAZ-3,** as well as incorporation of **PDF-HAZ-1** through **PDF-HAZ-4** as they pertain to the parks, the potential impacts related to safety and noise hazards would be reduced to a **less-than-significant impact with mitigation incorporated.**

Infrastructure Improvements

The proposed infrastructure improvements would similarly be located within the March ARB/Inland Port ALUCP and subject to the requirements and review process in accordance with **MM-HAZ-3** and applicable **PDF-HAZ-1** through **PDF-HAZ-4**. As a result, the potential impacts related to safety and noise hazards would be reduced to a **less-than-significant impact with mitigation incorporated.**

Conservation Easement

The developer and March JPA propose to establish a Conservation Easement in compliance with the CBD Settlement Agreement (Appendix S). As depicted in Figure 4.11-1, MARB/IPA Future Airport Noise Contours, portions of the Conservation Easement are outside of the 60 dBA CNEL and the rest is within the 60 to 65 dBA CNEL contour which is considered normally acceptable for the land uses of the Conservation Easement. The Conservation Easement is already accessed by the public for passive recreational purposes and no physical alteration to the Conservation Easement is anticipated. In addition, **PDF-HAZ-1** would ensure that no conflicts or hazards that could threaten the safety of ongoing aircraft operations. As such, there would be **no impact** with respect to resulting in a safety hazard or excessive noise for people accessing the Conservation Easement.

Threshold HAZ-5. ***Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?***

Specific Plan Area

Campus Development

As presented in Figures 2a and 2b in Appendix Q of this Draft EIR, Riverside County Fire Hazard Severity Zones Map and CAL FIRE Fire Hazard Severity Zones Map, the Project site was located in an area designated by the Riverside County's General Plan Safety Element and CAL FIRE as a High Fire Hazard Severity Zone (HFHSZ) in a Federal Responsibility Area (CAL FIRE 2021). However, since publication of the Notice of Preparation for this Project, as discussed in Section 4.18, the land on which the Project would be constructed is no longer classified as a HFHSZ. Wildfires can occur in developed areas as has been experienced throughout California in more recent years. The proposed Campus Development would be required to adhere to the most recent version of the California Fire Code which includes fire safety and fire suppression design requirements.

In addition, the Campus Development would adhere to the Fire Protection Plan (FPP) developed for the Project site (Appendix Q). The FPP provides an evaluation of the Project area's fire environment, modeled fire behavior, and fire

hazards and how identified risk can be reduced to levels below significance. The FPP provides results of an assessment of the fire authorities ability to provide service within acceptable timeframes, and documents the Project's fire protection features, compliance with applicable fire and building codes, alternative materials and methods for compliance, if required, and recommendations for features above and beyond code requirements, if necessary. The FPP also include measures to ensure fire protection safety through landscaping restrictions, maintaining fuel modification zone buffers site wide and on the Project's perimeter. All the recommendations of the FPP would be incorporated into the proposed plans. Furthermore, as evaluated in Threshold FIRE-1 in Section 4.18, Wildfire, of this EIR, the Campus Development would be consistent with the 2022 AG Guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA.

The Campus Development would also comply with applicable portions of Riverside County Fire Department, Fire Prevention Standards and County Ordinances No. 460 and No. 787-8 as further discussed in Section 4.18. Additionally, as outlined in **MM-FIRE-1**, vegetation management requirements would be implemented at the start of and throughout all phases of construction, and combustible materials would not be brought on site until site improvements (e.g., utilities, access roads, fire hydrants, fuel modification zones) have been implemented and approved by RCFD. Out of an abundance of caution, the Campus Development would be required to comply with all provisions in the Riverside County Code regulating development in a HFHSZ. These include requirements such as ignition-resistant building materials and systems, implementation and ongoing maintenance of fuel modification zones, fire flow and fire hydrant requirements, emergency evacuation plan requirements, egress requirements, and road width and length restrictions. With conversion of the undeveloped landscape to ignition-resistant development and landscaping, wildfires may still encroach upon and drop embers on the Campus Development but would not be expected to burn through the site due to the lack of available fuels and the typical ember decay rate. Further, the proposed fuel modification on perimeter edges adjacent to the open space areas would provide a buffer between fuels in the open space and structures within the Specific Plan Area. As described in Section 4.18, the Specific Plan Area would not be anticipated to facilitate wildfire spread or exacerbate wildfire risk, as demonstrated by the fire behavior modeling analysis presented in Section 4.18 and in Appendix Q. Therefore, considering adherence to the California Fire Code, Riverside County Fire Department requirements, and the FPP itself, the Campus Development's potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires is considered **less than significant**, and no additional mitigation is required.

Park

Similar to the Campus Development discussed above, the Park would be located on land that was formerly, but is not currently, classified as a HFHSZ. However, the proposed Park would be required to adhere to applicable Fire Code regulations and the FPP developed for the Project (Appendix Q). Furthermore, as evaluated in Threshold FIRE-1 in Section 4.18, Wildfire, of this EIR, the Park would be consistent with the 2022 AG Guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA. Therefore, with adherence to the California Fire Code, Riverside County Fire Department requirements, **MM-FIRE-1** and the FPP itself, the Park's potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires is considered **less than significant**, and no additional mitigation is required.

Infrastructure Improvements

The proposed infrastructure improvements would include utility and roadway networks throughout the Specific Plan Area, a new sewer lift station, electrical substation, and reclaimed water tank. The buried utilities and roadway networks would have negligible risk of loss or injury from wildfires because they would be underground and, once constructed, do not generally have anybody attending them. The other improvements would be subject to applicable

requirements of the California Fire Code, Riverside County Fire Department, **MM-FIRE-1**, and the FPP itself (Appendix Q). The purpose of the FPP is to eliminate causes of fire, prevent loss of life and property by fire, and comply with all applicable standards for these types of facilities. Furthermore, as evaluated in Threshold FIRE-1 in Section 4.18, Wildfire, of this EIR, the Infrastructure Improvements would be consistent with the 2022 AG Guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA. Therefore, adherence to these fire prevention and fire safety measures would ensure that the proposed infrastructure has a **less-than-significant impact**, and no additional mitigation is required.

Conservation Easement

The March JPA and the developer propose to establish a Conservation Easement in compliance with the CBD Settlement Agreement (Appendix S). No physical construction would occur within the Conservation Easement, and fuel modifications on perimeter edges adjacent to the Conservation Easement, consistent with the recommendations identified in the FPP (Appendix Q), would be required to minimize the potential for wildfire hazards. With implementation of the recommendations in the FPP, impacts would be **less than significant**, and no mitigation is required.

4.8.6 Mitigation Measures

The following mitigation measures have been evaluated for feasibility and are incorporated in order to reduce potentially significant impacts related to hazards and hazardous materials for people visiting or working within the Specific Plan Area.

MM-HAZ-1 **Abatement of Hazardous Building Materials.** Prior to issuance of demolition or grading permits, the Project applicant shall submit documentation to the satisfaction of the March Joint Powers Authority (JPA) that all recommendations from the January 17, 2022, Leighton Consulting Inc. Phase II Environmental Site Assessment for Meridian – West Campus Upper Plateau and the May 5, 2022, Leighton Consulting Inc. Hazardous Material (PCB/Treated Wood Waste) Investigation Report have been implemented at the Project site including but not limited to the following:

- The 42 pole-mounted transformers on site shall be disposed of or recycled in accordance with 40 CFR 761 and accompanied by the findings of the April 26, 2022 sampling results including the one sample that showed the presence of Aroclor 1260 at a concentration of 1.5 milligrams per kilogram. In the event that during removal activities, transformer oil is identified or suspected in underlying soils, an assessment of nearby soils and/or hardscapes for PCBs shall be performed in accordance with the requirements set forth in 40 CFR 761.
- Applicable laws and regulations regarding the abatement and removal of asbestos containing materials, metals (cadmium, chromium and/or lead), mercury in light switches and fluorescent tubes, and lead-based paint shall be adhered to and implemented prior to demolition activities.
- Universal Waste Rule items shall be managed in accordance with applicable regulatory requirements.
- All wood poles found throughout the site shall be managed in accordance with California's Alternative Management Standards for treated wood waste consistent with California Health and Safety Code Sections 25230 through 25230.18.

- Evaluate various wastes identified at the site for hazardous waste characterization under California and Resource Conservation and Recovery Act standards for appropriate disposal to a licensed disposal facility.
- All ground disturbing activities shall be conducted by workers trained to look for any suspect contamination which can include odorous soils, soil staining, pipelines, underground storage tanks, or other waste debris. If encountered, earthwork activities shall cease until laboratory analysis of soil samples have been conducted and direction given from the Air Force and/or overseeing agency.

MM-HAZ-2 **Materials Storage Near School.** Facilities located within one-quarter mile of an existing school, including public or private schools as well as preschools, shall not store, handle, or use toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code Section 25532.

MM-HAZ-3 **Airport Compatibility.** Prior to issuance of building permits, the Project applicant shall ensure the following:

- All development shall be designed in a manner which does not encroach into civilian and military airspace, as determined through a Federal Aviation Administration 7460-1 airspace analysis, that shall be completed prior to review by the Riverside County Airport Land Use Commission and the March Joint Powers Authority (JPA) granting individual plot plan approval.
- The Project engineer for any development shall submit information confirming that open detention basins, when incorporated into the Project, shall completely drain within 48 hours of a rain event.
- Within Airport Compatibility Zone C1, aboveground storage of more than 6,000 gallons of flammable or hazardous materials shall be reviewed by the Riverside County Airport Land Use Commission, prior to consideration of these facilities by the March JPA.
- Irrespective of above bullet, use/storage of acutely hazardous materials within Airport Compatibility Zone C1, in excess of threshold levels as identified in Title 8 of the Code of Regulations Appendix A to Section 5189 - List of Acutely Hazardous Chemicals, Toxics and Reactive, shall file for approval by the Riverside County Airport Land Use Commission prior to review and approval of the use by the March JPA.
- All development shall be consistent with the conditional approvals by the Riverside County Airport Land Use Commission made in their May 16, 2022, Development Review File No. ZAP1515MA22 as well as the 2014 March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan.

MM-FIRE-1, of Section 4.18, Wildfire, shall also be implemented.

4.8.7 Level of Significance After Mitigation

With implementation of **MM-HAZ-1**, **MM-HAZ-2**, **MM-HAZ-3**, and **MM-FIRE-1**, as outlined in Section 4.8.6, above, all hazards and hazardous materials impacts associated with the proposed Project would be **less than significant**.

4.8.8 Cumulative Effects

Hazards and hazardous materials impacts are generally localized to specific sites and do not combine with one another in a way to create a greater or more severe hazard. Impacts relative to hazardous materials usually depends on the nature and extent of the hazardous materials release, and existing and future soil and groundwater conditions. However, hazardous materials incidents tend to be limited to a smaller more localized area surrounding the immediate location and extent of a release and could only be cumulative if two or more hazardous materials releases overlapped spatially and contemporaneously, which is not common.

Related projects, as shown in Table 4-2, Cumulative Projects, would also be subject to federal, state, and local regulations regarding hazards and hazardous materials as that described above for the proposed Project. Although each site from the cumulative projects list (Table 4-2) has unique hazardous materials considerations, it is expected that future development within the region 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 as well as wildfires, as detailed within Section 4.18, would not be anticipated.

The proposed Project and related projects, as shown in Table 4-2, 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. Therefore, implementation of the proposed Project, in addition to the related projects identified in Table 4-2, would not result in cumulatively considerable impacts related to hazards and hazardous materials. 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**.

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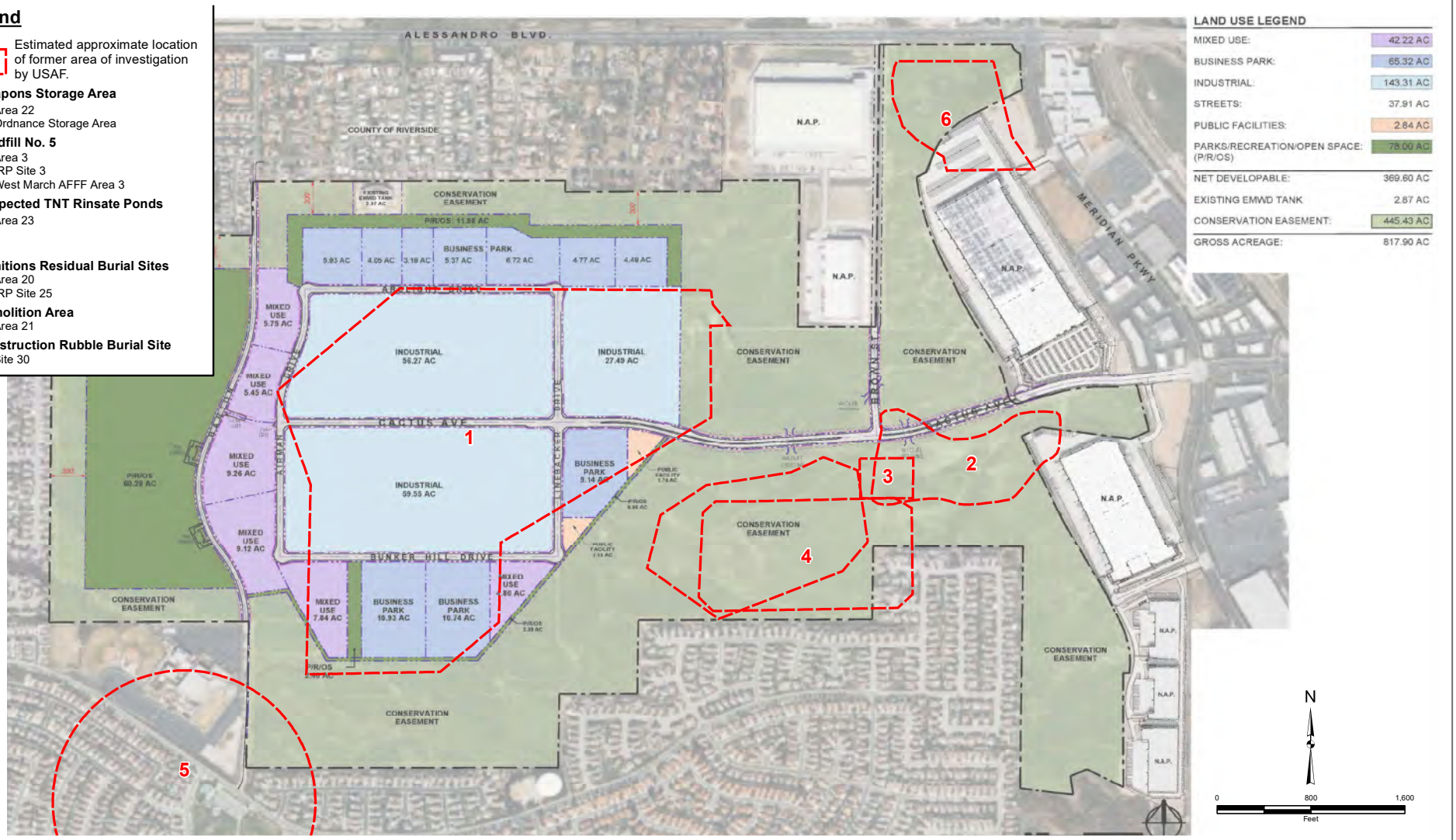

SOURCE: Dudek, 2023

FIGURE 4.8-1

US Air Force Investigation Sites

West Campus Upper Plateau EIR

DUDEK

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Land Use Category	CNEL (dB) 50–55	55–60	60–65	65–70	70–75
Residential *					
single-family, nursing homes, mobile homes	++	o	–	– –	– –
multi-family, apartments, condominiums	++	+	o	– –	– –
Public					
schools, libraries, hospitals	+	o	–	– –	– –
churches, auditoriums, concert halls	+	o	o	–	– –
transportation, parking, cemeteries	++	++	++	+	o
Commercial and Industrial					
offices, retail trade	++	+	o	o	–
service commercial, wholesale trade, warehousing, light industrial	++	++	+	o	o
general manufacturing, utilities, extractive industry	++	++	++	+	+
Agricultural and Recreational					
cropland	++	++	++	++	+
livestock breeding	++	+	o	o	–
parks, playgrounds, zoos	++	+	+	o	–
golf courses, riding stables, water recreation	++	++	+	o	o
outdoor spectator sports	++	+	+	o	–
amphitheaters	+	o	–	– –	– –

Land Use Acceptability		Interpretation/Comments
++	*Clearly Acceptable*	The activities associated with the specified land use can be carried out with essentially no interference from the noise exposure.
+	*Normally Acceptable*	Noise is a factor to be considered in that slight interference with outdoor activities may occur. Conventional construction methods will eliminate most noise intrusions upon indoor activities.
o	*Marginally Acceptable*	The indicated noise exposure will cause moderate interference with outdoor activities and with indoor activities when windows are open. The land use is acceptable on the conditions that outdoor activities are minimal and construction features which provide sufficient noise attenuation are used (e.g., installation of air conditioning so that windows can be kept closed). Under other circumstances, the land use should be discouraged.
–	*Normally Unacceptable*	Noise will create substantial interference with both outdoor and indoor activities. Noise intrusion upon indoor activities can be mitigated by requiring special noise insulation construction. Land uses which have conventionally constructed structures and/or involve outdoor activities which would be disrupted by noise should generally be avoided.
– –	*Clearly Unacceptable*	Unacceptable noise intrusion upon land use activities will occur. Adequate structural noise insulation is not practical under most circumstances. The indicated land use should be avoided unless strong overriding factors prevail and it should be prohibited if outdoor activities are involved.

* Subtract 5 dB for low-activity outlying airports (Chiriaco Summit and Desert Center)

FIGURE 4.8-2

Riverside County Airport Land Use Compatibility Criteria: Noise

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4.10 Land Use and Planning

This recirculated section of the Environmental Impact Report (EIR) describes the existing land use and planning conditions of the West Campus Upper Plateau Project (Project) site, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the Project, as applicable. In addition to other documents, the following references were used in the preparation of this section of the Draft EIR:

- Draft West Campus Upper Plateau Specific Plan No. SP-9 (Meridian 2023)
- General Plan of the March Joint Powers Authority (JPA) (March JPA 1999a)
- Master Environmental Impact Report for the General Plan of the March Joint Powers Authority (March JPA 1999b)
- Draft Environmental Justice Element of the March JPA General Plan (March JPA 2023)

As discussed in detail in Chapter 3, Project Description of this EIR, the Specific Plan outlines the land uses planned for the Project area, and this Draft EIR assumes the following buildout of the Specific Plan Area for analysis:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facilities – 2.84 acres for future sewer lift station and electrical substation

The proposed Project also includes the establishment of a 445.43-acre Conservation Easement in compliance with the Center for Biological Diversity (CBD) Settlement Agreement (Appendix S).

4.10.1 Existing Conditions

General Plan and Zoning

As shown in Figure 3-2, March JPA's General Plan currently designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS). The Project site has not previously been given a zoning designation per the March JPA Zoning Map, as shown in Figure 3-3, March JPA Zoning Designations.

Current On-Site Land Uses

Existing development within the Project site consists of a non-operational water tower, an existing public facility, paved and dirt access roads, and 14~~6~~ bunkers that were previously used for munitions storage by the Air Force prior to March AFB's realignment in 1993. All of the bunkers are currently used by Pyro Spectaculars, Inc. for the

storage of fireworks. While the Specific Plan Area encompasses existing development and previously disturbed land, the Conservation Easement primarily consists of open space and undeveloped land.

Surrounding Land Uses

The Project site is surrounded by residential uses to the north, west, and south; the Meridian West Lower Plateau development area, located within the March JPA planning area, to the east; and two new industrial buildings built by Exeter, located in Riverside County, to the northeast. The residential uses to the northwest and west are part of the Mission Grove neighborhood in the City of Riverside. A County unincorporated neighborhood is located to the north as well. The residential uses to the south are part of the Orangecrest neighborhood in the City of Riverside. Grove Community Church Preschool is located on the Grove Community Church campus, which is approximately 0.25 miles south of the Specific Plan Area. The next closest schools to the Project site, Benjamin Franklin Elementary School and Amelia Earhart Middle School, are located south of the Project site in the Orangecrest neighborhood. The Benjamin Franklin Elementary School is located approximately 0.8 miles south of the Specific Plan Area, and the Amelia Earhart Middle School is located approximately 1 mile south of the Specific Plan Area.

The parcels immediately to the east of the Project site are designated as Business Park (BP) and Industrial (IND). The parcels immediately to the north, west, and south of the Project site are not part of the March JPA planning area. The nearest residential area is located adjacent to the planned Conservation Easement and approximately 300 feet north of the proposed Business Park parcels in the Campus Development at its closest point (see Figure 3-5, Site Plan~~Appendix C-1 for more detail~~).

4.10.2 Relevant Plans, Policies, and Ordinances

Federal

Federal Aviation Administration

The Federal Aviation Administration (FAA) mandates that any structure that is located within proximity to an airport or other criteria per Code of Federal Regulations Title 14, Part 77.9, requires filing with the FAA. The Project site is wholly located within the March Air Reserve Base Military Outer Horizontal Surface, which may impact the assurance of navigation signal reception. As such, future implementation of the Project would require Project applicants to file Form FAA 7460-1, Notice of Proposed Construction or Alteration, with the FAA.

FAA Advisory Circular 150/5200-33C

In 2020, the FAA issued an Advisory Circular No. 150/5200-33C providing guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. The Advisory Circular also discusses airport development projects, including airport construction, expansion, and renovation, affecting aircraft movement near hazardous wildlife attractants. Hazardous wildlife is defined as any species of wildlife (birds, mammals, reptiles), including feral animals and domesticated animals not under control, that are associated with aircraft strike problems, are capable of causing structural damage to airport facilities, or act as attractants to other wildlife that pose a strike hazard. Included within the Advisory Circular are minimum separation criteria for land-use practices that attract hazardous wildlife to the vicinity of airports. Separation distances are based on flight patterns, altitude at which most strikes happen, and National Transportation Safety Board recommendations.

FAA Form 7460-2, Notice of Actual Construction or Alteration

The FAA must make a determination as to whether construction in a navigable airspace creates an impact on existing or proposed arrival, departure, and en-route procedures for aircraft operating under both visual flight rules and instrument flight rules, where there is an impact to existing and public-use airports, military airports and aeronautical facilities, such as the March Air Reserve Base, and the cumulative impact resulting from the structure when combined with the impact of other existing or proposed structures. At least 48 hours in advance of actual construction or alteration, Form 7460-2 must be filed with the FAA.

State

Government Code Sections 65450 through 65457

Pursuant to Government Code Section 65451, a Specific Plan must include text and a diagram or diagrams, which specify all of the following in detail:

- The distribution, location, and extent of the uses of land, including open space within the area covered by the plan.
- The proposed distribution, location, extent, and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy and other essential facilities proposed to be located within the land area covered by the plan and needed to support the land uses described in the plan.
- Standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable.
- A program of implementation measures including regulations, programs, public works projects and financing measures necessary to carry out the above items.
- A discussion of the relationship of the Specific Plan to the General Plan.

Senate Bill 375

Senate Bill 375 was signed in September 2008 (Chapter 728, Statutes of 2008), and coordinates regional transportation planning efforts, regional greenhouse gas (GHG) reduction targets, and land use and housing allocation to contain urban sprawl and reduce GHG emissions across the state. Senate Bill 375 requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or alternative planning strategy that will prescribe land use allocation. The California Air Resources Board (CARB), in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light duty trucks in the region for the years 2020 and 2035. These reduction targets will be updated every 8 years but can be updated every 4 years if advancements in emissions technologies improve the ability to achieve the targets. CARB is also responsible for reviewing each MPO's SCS or alternative planning strategy for consistency with its assigned targets. This law also extends the minimum time period for the regional housing needs allocation cycle from 5 years to 8 years for local governments located within an MPO that meets certain requirements. City or county land use policies (including general plans) are not required to be consistent with the regional transportation plan (and associated SCS or alternative planning strategy), although their housing elements must meet Regional Housing Needs Assessment targets (which will in part be influenced by the regional transportation plan). Ultimately, Senate Bill 375 is intended to prevent urban sprawl and encourage the co-location of housing and jobs to reduce commute times, limit traffic congestion, reduce transportation-related GHG emissions, and promote orderly growth.

Regional

Southern California Association of Governments

The Project site is located within the Southern California Association of Governments (SCAG) region and is part of Western Riverside Council of Governments. While March JPA is not a direct member of SCAG, the JPA's member agencies (County of Riverside, City of Riverside, City of Moreno Valley, and City of Perris) are members of SCAG. Senate Bill 375 requires MPOs to prepare an SCS in their Regional Transportation Plan (RTP). On September 3, 2020, SCAG formally adopted the Final 2020–2045 RTP/SCS (also referred to as Connect SoCal) and the addendum to the Connect SoCal Program EIR (SCAG 2020). Connect SoCal presents the land use and transportation vision for the SCAG region through 2045. The following are the Connect SoCal goals: (1) encourage regional economic prosperity and global competitiveness; (2) improve mobility, accessibility, reliability, and travel safety for people and goods; (3) enhance the preservation, security, and resilience of the regional transportation system; (4) increase person and goods movement and travel choices within the transportation system; (5) reduce greenhouse gas emissions and improve air quality; (6) support healthy and equitable communities; (7) adapt to a changing climate and support an integrated regional development pattern and transportation network; (8) leverage new transportation technologies and data-driven solutions that result in more efficient travel; (9) encourage development of diverse housing types in areas that are supported by multiple transportation options; (10) promote conservation of natural and agricultural lands and restoration of habitats (SCAG 2020).

Western ~~Regional~~ Riverside Council of Governments

The Western Riverside Council of Governments represents 18 cities, the Riverside County Board of Supervisors, the Eastern and Western Municipal Water Districts, and the Morongo Band of Mission Indians, and sets policy for the organization. The Western Riverside Council of Governments focuses on a number of regional matters including transportation, environment, energy, economy, and health (WRCOG 2020). While March JPA is not a direct member of the Western Riverside Council of Governments, the JPA's member agencies (County of Riverside, City of Riverside, City of Moreno Valley, and City of Perris) are members of the regional organization.

Stephens' Kangaroo Rat Habitat Conservation Plan

The Stephens' Kangaroo Rat Habitat Conservation Plan (SKR HCP) was completed in 1996 by the Riverside County Habitat Conservation Agency (RCHCA), CDFW, and USFWS. The SKR HCP was created as a regional plan for species permitting and conservation so that individual projects could receive FESA take authority for the species through Riverside County, rather than individually. The SKR HCP established seven "core reserves," totaling more than 41,000 acres, within a planning area of 533,000 acres. The RCHCA is responsible for "completing" the reserves through the addition of land in fee simple or through the acquisition of easements (RCHCA 1996).

A portion of the Core Reserve (the March Air Force Base SKR Management Area) was previously identified within the March Air Reserve Base. In 2003, the USFWS agreed to a land exchange in which the portion of the Core Reserve within the March JPA was released in exchange for land in Potrero (USFWS 2003). The Center for Biological Diversity and Audubon Society challenged the USFWS decision, and a settlement agreement was executed in 2012 (Cent*er for Biological Diversity v. Jim Bartel, et. al.* S.D. Cal. No. 09-cv-1854-JAH-POR; 'CBD Settlement Agreement') (Appendix S). Under the CBD Settlement Agreement, 649 acres of the former management area lands were identified as conservation lands to support Stephens' kangaroo rat. The Project's proposed 445.43-acre Conservation Easement will provide the remaining acreage required by the CBD Settlement Agreement (Appendix S). Under the SKR HCP, development within the Plan boundaries, but outside the Core Reserves, is

deemed to have been fully mitigated for any impacts to Stephen's kangaroo rat through compliance with the SKR HCP and the payment of a fee (RCHCA 2020). March JPA is not a Permittee to the SKR HCP; however, if a project under March JPA's oversight (CEQA lead agency) is anticipated to impact (would have a take of) Stephens' kangaroo rat, the March JPA may contact the RCHCA regarding obtaining a special agreement to participate in the Stephens' Kangaroo Rat HCP, which would include payment of mitigation fees.

Western Riverside County Multiple Species Habitat Conservation Plan

The Project is located within an area covered by the Western Riverside MSHCP. The Western Riverside MSHCP serves as a habitat conservation plan pursuant to Section 10(a)(1)(B) of the federal Endangered Species Act (16 USC 1531 et seq.), as well as a Natural Communities Conservation Plan under the Natural Community Conservation Planning Act of 2001 (Fish and Game Code, Section 2800 et seq.). The Western Riverside MSHCP allows the participating jurisdictions to authorize "take" of plant and wildlife species identified within the Plan Area. The U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) have authority to regulate the take of threatened, endangered, and rare species. Under the Western Riverside MSHCP, the wildlife agencies have granted "take authorization" for otherwise lawful actions, such as public and private development that may incidentally take or harm individual species or their habitat outside of the WRMSHCP conservation area, in exchange for the assembly and management of a coordinated Western Riverside MSHCP conservation area. The March JPA is not a permittee under the MSHCP and therefore is not eligible for its take coverage. However, if needed, March JPA could seek "take" coverage through the MSHCP Participating Special Entity process and convey that take to ~~the Project~~ a project applicant. The activities of the Participating Special Entity must comply with the terms and requirements of the MSHCP permits, the MSHCP, and the Agreement with the participating special entity. Participating Special Entities also contribute to the MSHCP through payment of a fee based upon the type of proposed activity, which shall be applicable to all activities in the Plan Area.

Local

March Air Reserve Base/Inland Port Airport Air Installations Compatible Use Zones

The 2018 March ARB/Inland Port Air Installation Compatible Use Zone Study provided an extensive analysis of the effects of aircraft noise, accident potential, and compatible land use and development upon present and future neighbors of the March ARB/Inland Port (March ARB 2018). The Air Installation Compatible Use Zone (AICUZ) program is a means to protect public safety and health, while also protecting the Air Force's national defense mission, which includes training pilots. Based on the 2018 AICUZ noise level contours for the March ARB/IPA, the Specific Plan Area is located mostly between the 60 to 65 dBA CNEL noise level contour boundaries that is considered normally acceptable for the proposed Project land uses, as shown in Figure 4.10-1, AICUZ Noise Contours. For more discussion, see Section 4.11, Noise, of this EIR.

Riverside County Airport Land Use Compatibility Plan ~~Commission~~

The Riverside County Airport Land Use Commission (ALUC) has been assigned lead responsibility for airport land use compatibility planning around each of the public-use and military airports in Riverside County. The Project site is located within the March ARB/Inland Port airport influence area within unincorporated Riverside County and therefore is subject to review and approval by the Riverside County ALUC.

The March ARB/Inland Port Airport Land Use Compatibility Plan (ALUCP) was prepared for and adopted by the Riverside County ALUC on November 13, 2014 (~~Riverside County ALUC~~ Mead & Hunt 2014). The purpose of the

March ARB/Inland Port ALUCP is to promote compatibility between the March ARB/Inland Port Airport and the land uses that surround the joint-use airport, to the extent such areas are not already devoted to incompatible uses. The March ARB/Inland Port ALUCP regulates future development of new residential dwellings, commercial structures, and other noise- or risk-sensitive uses within the Airport Influence Area based on factors enumerated in the ALUCP, including, but not limited to, noise, overflight, safety, and airspace protection. According to the ALUCP (Figure 4.10-2), the Project site is located in Zones B1, B2, C1, and C2 (Mead & Hunt 2014). The Specific Plan Area is within Zones C1 and C2, while the Conservation Easement is within Zones B1, B2, C1 and C2. Zone B1 is designated as the Inner Approach/Departure Zone, which encompasses areas of high noise impact and high-risk level for safety and airspace protection factors. Zone B2 is described as a High Noise Zone, encompassing high noise impact and moderate risk level for safety and airspace protection factors. Zone C1 is designated as a Primary Approach/ Departure Zone, which encompasses areas of moderate to high noise impact and moderate risk level for safety and airspace protection factors. Zone C2 is described as a Flight Corridor Zone, which encompasses areas of moderate noise impact and moderate to low risk level for safety and airspace protection. The following restrictions apply for each zone, as shown in Table MA-2, Basic Compatibility Criteria for the March Air Reserve Base / Inland Port Authority (Mead & Hunt 2014):

Zone B1 (Inner Approach/ Departure Zone):

- Residential Density: No new dwellings allowed
- Other Uses: An average of 25 people per acre in Accident Potential Zone (APZ) I, and 50 people per acre in APZ II and outside APZs; or 100 people per one acre
- Required Open Land: Maximum of 50% lot coverage within APZs
- Prohibited Uses: Children's schools, day care centers, libraries; hospitals, congregate care facilities, hotels/ motels, restaurants, places of assembly; buildings with greater than 1 aboveground habitable floor in APZ I or greater than 2 floors in APZ II and outside of APZs; hazardous materials manufacture/ storage; noise sensitive outdoor nonresidential uses; critical community infrastructure facilities; hazards to flight; uses listed in the AICUZ as not compatible in APZ I or APZ II
- Other Development Conditions: Locate structures maximum distance from extended runway centerline; sound attenuation as necessary to meet interior noise level criteria; zoned fire sprinkler systems required; airspace review required for objects greater than 35 feet tall; electromagnetic radiation notification; avigation easement dedication and disclosure

Zone B2 (High Noise Zone):

- Residential Density: No new dwellings allowed
- Other Uses: An average of 100 people per acre or 250 people per one acre
- Required Open Land: No requirement
- Prohibited Uses: Children's schools, day care center, libraries; hospitals, congregate care facilities, hotels/motels, places of assembly; buildings with greater than 3 aboveground habitable floors; noise-sensitive outdoor nonresidential uses; critical community infrastructure facilities; hazards to flight
- Other Development Conditions: Locate structures maximum distance from runway; sound attenuation as necessary to meet interior noise level criteria; aboveground bulk storage of hazardous materials discouraged; airspace review required for objects greater than 35 feet tall; electromagnetic radiation notification; avigation easement dedication and disclosure

Zone C1 (Primary Approach/ Departure Zone):

- Residential Density: Less than or equal 3.0 dwelling units per acre (du/ac)
- Other Uses: An average of 100 people per acre or 500 people for one acre
- Required Open Land: No requirement for open land
- Prohibited Uses: Children's schools, day care centers, libraries; hospitals, congregate care facilities, places of assembly; noise-sensitive outdoor nonresidential uses; and hazards to flight
- Other Development Conditions: Critical community infrastructure facilities discouraged; aboveground bulk storage of hazardous materials discouraged; sound attenuation as necessary to meet interior noise level criteria; airspace review requirements for objects greater than 70 feet tall; electromagnetic radiation notification; deed notice and disclosure

Zone C2 (Flight Corridor Zone):

- Residential Density: Less than or equal to 6.0 du/ac
- Other Uses: An average of 200 people per acre or 500 people for one acre
- Required Open Land: No requirement for open land
- Prohibited Uses: Highly noise-sensitive outdoor nonresidential uses; hazards to flights
- Other Development Conditions: Children's schools discouraged; airspace review requirement for objects greater than 70 feet tall; electromagnetic radiation notification; and deed notice and disclosure

March Air Force Base Final Reuse Plan

After March Air Force Base (AFB) was slated for realignment, March JPA was established to plan for the economic revitalization of the area and recognized by the Department of Defense and the State of California as the official local redevelopment agency for March AFB. The base reuse planning process involved three primary phases: base-wide reuse planning, disposal decision making, and parcel-by-parcel decision implementation.

In the first phase—base-wide reuse planning—March JPA developed the March AFB Final Reuse Plan in accordance with federal requirements for the Air Force to identify means of revitalizing or redeveloping the realigned military installation in a beneficial manner (March JPA 1996). The primary function of the Reuse Plan was to facilitate economic recovery after base realignment. The principal task in the first phase was the development of alternative land use patterns for the reuse lands that were logical and reasonably feasible based on available information, reflected the consensus of representatives from the four jurisdictions around the base, and included a "Community Preferred" pattern, which reflected the ultimate reuse goals of neighboring communities. Through the planning process described in Section II of the Reuse Plan, March JPA developed the Preferred Land Use Pattern, along with three alternatives: Alternative Pattern, Partially Constrained SKR Pattern, and Fully Constrained SKR Pattern (March JPA 1996).

In the second phase—disposal decision making—the Air Force completed an environmental impact statement pursuant to the National Environmental Policy Act, reviewing the Reuse Plan's Preferred Land Use Pattern, along with the three alternatives. The Air Force issued a Record of Decision selecting the Preferred Land Use Pattern as set forth in the Reuse Plan. The Reuse Plan and its environmental impact statement were the final documents for property reuse and disposal.

The third phase—parcel-by-parcel decision implementation—started with the development of the March JPA General Plan. The Preferred Land Use Pattern of the Reuse Plan served as the basis for the March JPA General Plan. The Reuse Plan remains an important document for historical purposes but does not control land use development decisions within the March JPA Planning Area.

March JPA General Plan

The March JPA General Plan is a long-range comprehensive plan designed to outline and delineate use and development of an area known formerly as March Air Force Base (AFB), prior to the base realignment in April 1996 to the March ARB. The March AFB was first established as a military installation in 1918 and has operated almost continually since that time. In July 1993, March AFB was selected to be realigned, and subsequently converted from an active-duty base to a Reserve Base, effective April 1, 1996. With the announcement of base realignment at March AFB, the adjacent jurisdictions immediately formed a Joint Powers Authority, known as March JPA. March JPA is a public entity, created for the purpose of addressing the use, reuse, and joint use of the realigned March AFB. The four individual public entities that cooperatively formed the JPA are the cities of Perris, Moreno Valley, and Riverside, and the County of Riverside. The JPA was created by separate resolutions of the four jurisdictions in September 1993. The March JPA defines reuse and development opportunities of the area, while preserving the environmental quality. The March JPA General Plan is designed to implement the March AFB ~~Master~~ Reuse Plan, which includes the disposal and redevelopment of approximately 4,400 acres of the 6,500-acre former March ARB. As described in the Final Master EIR for the March JPA General Plan (March JPA 1999b), the March JPA General Plan and the Master EIR are the establishing documents to guide the planning process within the March JPA Planning Area and "can be termed as functioning or 'living' documents through their implementation." Since the development of the March JPA General Plan in 1999, the Project site has been slated for development. Exhibit 5-1 of the March JPA General Plan identifies the former Weapons Storage Area as SKR Open Space and the remainder of the Project site as SKR Management Area. However, the March JPA General Plan Land Use Profile Report (p. 1-39) (March JPA 1999a) states:

> Subsequent to the decision to realign March [AFB], a strategy was developed to trade SKR habitat on March in-exchange for-purchasing SKR habitat elsewhere in Western Riverside County in order to take full advantage of the economic redevelopment potentials afforded by surplus lands at March.
>
> The SKR habitat at March is surrounded by urban and urbanizing uses that will diminish the biological value of those lands as viable SKR habitat over the long-term. Under these conditions, and given the value of March properties for development to replace jobs lost by the realignment, it was determined that more and better quality SKR habitat could be purchased elsewhere. The reopening of the 1991 agreement [between March AFB and USFWS] to pursue this land use/management strategy is currently underway. The general plan work program assumes that this strategy will be successful, and that **the lands currently designated for SKR management and open space purposes will be available for development** [emphasis added].

As shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, in this EIR, the March JPA General Plan generally designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park.

The March JPA General Plan establishes goals and policies to reach long-term objectives, and establishes long-term policies for day-to-day decisions, based upon those objectives (March JPA 1999a). The March JPA adopted ~~certified~~

the General Plan ~~In~~ in 1999. The goals and policies relevant to the Project are contained within the March JPA General Plan Land Use Element, Transportation Element, Noise/Air Quality Element, Resource Management Element, ~~and~~ Safety/Risk Management Element, and Draft Environmental Justice Element, as described below.

Land Use Element

The Land Use Element of the March JPA General Plan is based upon the March AFB ~~Master~~ Reuse Plan preferred land use pattern. This element delineates the general location and distribution of land uses, extent of existing and proposed land uses for the March JPA planning area, and development criteria for development intensity. The goals and policies contained within the Land Use Element address the capitalization of the opportunities within the planning area, and the reuse and revitalization of existing facilities. The goals and policies contained in the Land Use Element focus on maintaining a balance between commerce, industry, and aviation uses, while promoting high quality development and minimizing land use conflicts. As shown in Figure 3-2, the Land Use Element currently designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS).

Transportation Element

The Transportation Element of the March JPA General Plan determines the way in which land use is ultimately distributed throughout the March JPA planning area and the subsequent resulting physical environment. The location, classification, capacity, and mode type play an important role in shaping air quality, noise impacts, natural habitat, development types, and general appearance of the planning area. The Transportation Element includes Exhibit 2-3, Transportation Plan Systems, as amended by Resolution JPA #21-02, which identifies Cactus Avenue, Alessandro Boulevard, Van Buren Boulevard, and Meridian Parkway as truck routes. All truck routes are oriented to and from Interstate 215. The extent of necessary facilities, adequacy of service levels, and transportation demand management measures, along with general location and infrastructure facilities, are described within this element of the General Plan.

Noise/Air Quality Element

The Noise/Air Quality Element of the March JPA General Plan addresses noise and air quality due to the nexus of generators and significance to the General Plan and region. The Noise/Air Quality Element examines the existing and future noise environment and noise generators of the planning area. The Noise/Air Quality Element contains a discussion of local and regional air quality, stationary and mobile emission sources, and programs to reduce pollutant emissions generated.

Resource Management Element

The Resource Management Element of the March JPA General Plan provides for the conservation, development, and use of natural, historical, and cultural resources. The Resource Management Element also details plans and measures for the preservation of open space designed to promote the management of natural resources, outdoor recreation and public health and safety.

Safety/Risk Management Element

The Safety/Risk Management Element of the March JPA General Plan identifies and establishes standards and plans for the protection of the planning area from a variety of hazards including earthquakes, flooding, fire, geological, and airport compatibility conditions.

Draft Environmental Justice Element

In November 2023, March JPA released a Draft Environmental Justice Element (March JPA 2023). The March JPA Draft Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to Government Code Section 65301(a). The County of Riverside Board of Supervisors adopted environmental justice policies by Resolution 2021-182 on September 21, 2021. The County's environmental justice policies apply to the unincorporated territory within the County of Riverside. March JPA's land use authority will revert back to the County of Riverside on July 1, 2025, in accordance with the 14th Amendment to the March JPA Joint Powers Agreement. The goal of the Draft Environmental Justice Element is to ensure the consideration of environmental justice policies, in order to improve public health and the environment within the March JPA Planning Area. Policies and new land use development proposed within the March JPA Planning Area will be evaluated for promoting all environmental justice policies. The land use entitlement process provides a key opportunity to address environmental justice policies through the creation of safe, healthy, and environmentally sustainable communities.

March JPA Development Code

The primary implementation mechanism for the Land Use Element is the March JPA Title 9, Development Code, which provides zoning, development and subdivision regulations for all land within its jurisdiction (March JPA 2016).

County of Riverside Good Neighbor Policy for Logistics and Warehouse/Distribution Uses

In 2019, the County of Riverside Board of Supervisors approved a Good Neighbor Policy to provide a framework for large scale e-commerce and warehouse facilities larger than 250,000 square feet (County of Riverside 2019). Although the County of Riverside does not have direct land use control within the March JPA jurisdiction, it is anticipated that in approximately 2025, the County of Riverside will assume full land use control over the March JPA Planning Area, due to the planned sunsetting/dissolution of the March JPA. The March JPA Draft Environmental Justice Element directs projects to address consistency with the County's Good Neighbor Policy for Logistics and Warehouse/Distribution uses. This provides an additional metric to determine if the Project's impacts are significant and provides an appropriate set of policies that are intended to guide development within unincorporated Riverside County.

4.10.3 Thresholds of Significance

The significance criteria used to evaluate the Project impacts to land use and planning are based on the March JPA 2022 California Environmental Quality Act (CEQA) Guidelines. According to the March JPA CEQA Guidelines, a significant impact related to land use and planning would occur if the Project would:

LU1: Physically divide an established community.

LU2: Conflict with any applicable 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.

As discussed in the Initial Study (Appendix A) prepared for the Project, the Project would not physically divide an established community, and no impact would occur. Accordingly, this issue is not analyzed within this section of the

EIR. For details regarding this threshold, please refer to Section 5.2, Effects Found Not to be Significant, as well as Appendix A. For the purposes of this analysis, a significant land use impact would occur if the Project would:

LU-1: Conflict with any applicable 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.

4.10.4 Impacts Analysis

Threshold LU-1. ***Would the Project cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?***

To evaluate the Project's impacts related to land use and planning, this analysis examines the Project's consistency with both regional and local plans, policies, and regulations that regulate land uses within the Project site. These plans are as follows:

- March JPA General Plan (including the Draft Environmental Justice Element)
- March JPA Development Code
- Riverside County Airport Land Use Compatibility Plan
- Good Neighbor Policy for the County of Riverside
- Habitat Conservation Plans – Consistency with the Stephens' Kangaroo Rat Habitat Conservation Plan and Western Riverside County Multiple Species Habitat Conservation Plan are discussed in Threshold BIO-6 of Section 4.3, Biological Resources, which concludes the Project would result in beneficial impacts with the incorporation of mitigation measures **Mitigation Measure (MM)-BIO-1**, **MM-BIO-2**, **MM-BIO-5A**, **MM-BIO-5B**, and **MM-BIO-8**.
- SCAG's Connect SoCal (2020–2045 RTP/SCS) – Consistency with Connect SoCal is discussed in Table 4.15-2 of Section 4.15, Transportation, of this EIR, which concludes the Project's consistency impacts would be **less than significant.**

In summary and further discussed below, the March JPA General Plan designates the Project site as Business Park (BP), Industrial (IND), and Park/Recreation/Open Space (P/R/OS) land uses.

The Project site has not previously been given a zoning designation by March JPA. The Project proposes a General Plan Amendment that would substantially increase the planned Park/Recreation/Open Space from the current 122 acres to 523.43 acres, eliminate approximately 622.5 gross acres of planned Business Park and 63 acres of planned Industrial, apply Specific Plan (SP-9) to 369.60 gross acres, and apply Public Facility (PF) to 2.87 acres to accommodate an existing EMWD water storage tank. The proposed Specific Plan includes a mix of Industrial, Business Park, Mixed Use, Parks/Recreation/Open Space, and Public Facility land uses. The Project also includes the establishment of a 445.43-acre Conservation Easement, which would be zoned as Open Space–- Conservation, in compliance with the CBD Settlement Agreement (Appendix S). The Project proposes adoption of Specific Plan SP-9 consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13 containing development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop the Specific Plan Area. As discussed in detail in Chapter 3, Project Description of this EIR, the Specific Plan outlines the

land uses planned for the Project area, and this Draft EIR assumes the following buildout of the Specific Plan Area for analysis:

- Building B – 1,250,000 square feet (SF) of high-cube fulfillment center warehouse use
- Building C – 587,000 SF of high-cube fulfillment center warehouse use
- Industrial Area – 725,561 SF of high-cube fulfillment center warehouse use
- Industrial Area – 500,000 SF of high-cube cold storage warehouse use
- Business Park Area – 1,280,403 SF of business park use
- Mixed Use Area – 160,921 SF of retail use (25%)
- Mixed Use Area – 482,765 SF of business park use (75%)
- 60.28-acre park (with Active and Passive uses)
- 17.72 acres of Open Space use
- Public Facilities – 2.84 acres for future sewer lift station and electrical substation

March JPA General Plan

Specific Plan Area and Conservation Easement

For purposes of evaluating the consistency of the Project with the March JPA General Plan, the entirety of the Project (the Specific Plan Area and the establishment of the Conservation Easement) are evaluated together. The Project proposes a General Plan Amendment, Specific Plan, Zoning Amendment, Tentative Parcel Map, two Plot Plans, ~~an amendment to the Disposition and Development Agreement~~ and a Development Agreement to redevelop the former munitions bunkers of the March AFB. The current General Plan land use designations for the Project site are Business Park (BP), Industrial (I), and Park/Recreation/Open Space (P/R/OS). Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space (Figure 3-2). The March JPA General Plan includes warehousing in the definition of Business Park uses (March JPA 1999a). Moreover, wholesale, storage, and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code (March JPA 2016). Thus, the Project designates more land for non-development uses and does not introduce new designated uses.

With the adoption of the proposed General Plan Amendment, the Project would increase planned Park/Recreation/Open Space land uses from the current 122 acres to 445.43 acres and convert approximately 622.5 gross acres of planned Business Park and 63 acres of planned Industrial to Specific Plan (SP-9). The Project's Specific Plan would consist of a total of 369.6 acres, including a mix of Industrial, Business Park, Mixed Use, and Parks/Recreation/Open Space, and Public Facility land uses. The Project also includes the establishment of a 445.43-acre Conservation Easement, which would be designated as Open Space–- Conservation, in compliance with the CBD Settlement Agreement (Appendix S). Furthermore, the Project would facilitate a buildout assumed for the Project site (see above). As such, a consistency analysis is provided within Table 4.10-1 to demonstrate compatibility of both the Project's proposed Specific Plan Area and Conservation Easement with each applicable goal of the March JPA General Plan.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Land Use Element	
Goal 1: Land Use Plan provides for a balanced mix of land uses that contribute to the regional setting, and capitalize on the assets of the planning area, while insuring compatibility throughout the planning area and with regional plans.	***Consistent:*** Development of the Project would occur in a logical pattern of growth through the guidance of a Specific Plan, compatible with adjacent land uses to the east and northeast. Consistent with the vision of the March JPA General Plan, the Project would develop employment-generating land uses for the Project site's vicinity that is largely residential, such as those to the north, south, and west. As further detailed in Section 4.12, Population and Housing, the Project would maintain the balanced jobs-housing ratio under existing and future conditions of Riverside County, thus, providing an opportunity for residents to work locally, rather than commute to surrounding areas throughout the region. The proposed Project includes a 60.28-acre park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The currently existing service roads within the Conservation Easement would continue to be utilized by the public for passive recreation as authorized by the March JPA. The Project's proposed land uses would further provide a balanced mix of uses for the local and regional vicinity.
Policy 1.9: Plan for compatible land uses within the aircraft noise impact contours depicted in the Air Installation Compatible Use Zones (AICUZ) Report for the airfield use.	***Consistent.*** A portion of the Project site is located within the 60 dB to 65 dB CNEL noise contour level, and the remainder of the Project site is outside the 60 dB CNEL contour (Figure 4.10-1, AICUZ Noise Contours). Industrial, commercial, public/quasi-public, and open space land uses are considered compatible for noise contours less than 80 dB CNEL. Parks are considered appropriate within 60 dB–70 dB.
Goal 2: Locate land uses to minimize land use conflict or creating competing land uses, and achieve maximum land use compatibility while improving or maintaining the desired integrity of the planning area and subregion.	***Consistent.*** The March JPA General Plan identified the need to develop commercial, industrial, and business park land uses within the March JPA planning area to recapture economic loss attributed to March AFB realignment and improve the jobs/housing balance within the Western Riverside County subregion. Existing development within the Project site consists of a water tower, dirt access roads, and 14~~6~~ bunkers that were previously used for munitions storage by the Air Force. The March JPA General Plan includes warehousing in the definition of Business Park uses. Moreover, wholesale, storage, and distribution is expressly identified as an allowed use within the Business Park Zoning District, as identified in the March JPA Development Code. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. The proposed Specific Plan Area would provide a mixture of compatible land uses. The land proposed for the Conservation Easement primarily consists of open space and undeveloped land. In compliance with the

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	CBD Settlement Agreement (Appendix S), the Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. This would minimize potential conflicts with residential uses to the north, south, and west. Moreover, the Project would be developed in compliance with the proposed Specific Plan, which would facilitate a proposed buildout of industrial, mixed-use, and business park land uses within the Specific Plan Area. Public facilities, parks and open space, and proposed infrastructure improvements would improve the Project site's area. Incompatible or competing land uses would not be permitted within the Project site with the approval of the proposed Specific Plan.
Goal 3: Manage growth and development to avoid adverse environmental and fiscal effects.	***Partially Consistent.*** The Project would be developed in accordance with the development standards and design guidelines of the proposed Specific Plan. Development of the Specific Plan Area will be phased to ensure the required infrastructure and services are in place. As discussed in Section 4.12, Population and Housing, the Project would not conflict with the existing and future growth projections anticipated under SCAG's Connect SoCal. As demonstrated throughout this EIR, the Project's potential environmental impacts are analyzed. When potentially significant impacts are anticipated, this EIR incorporates applicable and feasible mitigation measures in order to reduce impacts~~ to a less than significant level~~. However, some environmental impacts would be significant and unavoidable (see Chapter 5, Other CEQA Considerations). As such, the development of the proposed Project would not avoid all potentially adverse environmental effects. Regarding fiscal effects, the March JPA General Plan identified the need to develop commercial, industrial, and business park land uses within the March JPA planning area to recapture economic loss attributed to March AFB realignment and improve the jobs/housing balance within the Western Riverside County subregion. The Project would, therefore, result in beneficial fiscal effects with the buildout of the Specific Plan.
Policy 3.1: Manage growth so that its rate does not exceed the ability of March JPA or service districts to provide for an acceptable level of public facilities and services.	***Consistent.*** As discussed in Section 4.13, Public Services, the increase in demand for fire protection services due to the Project's infrastructure improvements would result in a less than significant impact. Incorporation of **MM-FIRE-1**, which would ensure adequate firebreaks and vegetation management are implemented prior to the issuance of grading and building permits (see Section 4.18, Wildfire for more details), would further reduce impacts related to fire protection services. The Project would also construct the Meridian Fire Station. In addition, the Project would be subject to the County's Structural Fire Tax, which would be used to offset the costs of increased operations and maintenance costs. As discussed in Section 4.15, Transportation, **PDF-TRA-3** directs the Project applicant to provide the March JPA with compensation of $100,000 to fund truck route enforcement for a period of 2 years, which allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	The proposed Project includes a 60.28-acre Park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground; multi-use sports fields that could be used for soccer, football, and field hockey; and trails with cardio stops for recreational users. The currently existing service roads within the Conservation Easement would continue to be utilized by the public for passive recreation as authorized by the March JPA.
Policy 3.2: Manage the development and reuse of the Planning Area to maintain continuity with existing facilities and the operations of the Air Force Reserves (AFRES); provide for orderly expansion of infrastructure and public services; and minimize impacts on natural environmental resources.	***Consistent.*** Industrial uses are currently east and northeast of the Project site. The Project would extend Brown Street south and Cactus Avenue west to provide access and utility infrastructure to the Campus Development. Only the Park and open space amenities would be accessible off of the Barton Street extension. With the implementation of the mitigation measures presented in this EIR, impacts on natural environmental resources would be minimized.
Policy 3.3: Use finance mechanisms such as benefit assessment districts, development fees, and maintenance districts to ensure new development within the Planning Area constructs the public facilities and fiscally supports the public services necessitated by the development.	***Consistent.*** The Project includes the installation of utility and roadway networks connecting to and throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, the construction of a new 0.5-million-gallon reclaimed water tank, and the 60-acre Park. Table 7-1 of the proposed Specific Plan outlines the maintenance responsibilities for the public facilities and infrastructure, which will be managed through either a Landscape and Lighting Maintenance District or a Community Facilities District, at March JPA's discretion.
Policy 3.4: Assess the fiscal impacts (service costs and revenues) of proposed major development projects to determine the actual cost of providing services.	***Consistent.*** The Project would pay all the applicable TUMF, DIF, connection/capacity charges, and fair-share fees associated with development. The Project would further pay all service-related fees as set by each individual service provider.
Policy 3.5: Permit the development of service facilities ancillary to primary development (i.e., child care, food service, etc.).	***Consistent.*** Table 3-1 of the proposed Specific Plan identifies ancillary uses allowed in each land use designation. For example, Food and Beverage Sales may be an ancillary use in the Industrial zone. Child Care is not identified as an ancillary use due to the general location within or adjacent to the Primary Approach/Departure Zone, as reviewed and conditioned by the Riverside County Airport Land Use Commission.
Goal 4: Develop an identity and foster quality development within the planning area.	***Consistent.*** The Project proposes the adoption of a Specific Plan with development standards and guidelines necessary to develop the Project site consistent with the proposed General Plan Amendment. With approval of the Specific Plan, design guidelines would establish architectural styles, signage, parking, and landscaping standards that would develop a Project identity and foster quality development through the Project's buildout scenario.
Policy 4.4: Develop a distinctive community identity for commercial, business park and industrial developments that reflect the character and atmosphere of March JPA Planning Area through the use of	***Consistent.*** See response to Land Use Element Goal 4, above. The proposed Specific Plan includes Design Guidelines that identify a color palette, building materials, and design philosophy to reflect a consistent and distinct character for the Specific Plan Area.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
good planning and design principles, and sound development practices which serve as guidelines for building materials, colors, site design and orientation, and landscaping.	
Goal 5: Maximize and enhance the tax base and generation of jobs through new, reuse and joint use opportunities.	***Consistent***. The proposed land uses for the Project site would permit various employment-generating land uses within the proposed Industrial, Mixed Use, and Business Park designations. The Project's buildout would provide tax base enhancements and recapture economic loss attributed to March AFB realignment.
Goal 6: Support the continued Military Mission of March Air Reserve Base, and preservation of the airfield from incompatible land use encroachment.	***Consistent***. The Project site is within the boundaries of the March ARB/Inland Port ALUCP and March ARB AICUZ study area, as shown in Figures 4.10-1 and 4.10-2. The land uses proposed under the Project are allowed and compatible under the ALUCP. Given this, the Project would not conflict with the continued operations of the March ARB. For more discussion, see the consistency analysis under Riverside County Airport Land Use Compatibility Plan, below, in this section.
Policy 6.2: Plan for compatible land uses within the Clear Zone, Accident . Potential Zones I & II, as depicted in the Air Installation Compatible Use Zones (AICUZ) Report for the airfield use.	***Consistent.*** As shown in Figure 5-2 of the 2018 AICUZ Study (March ARB 2018), the Project site is located outside the Clear Zone, Accident Potential Zones I & II.
Policy 6.4: Ensure that plans and development do not conflict with the long-term needs of the Air Force Reserve in terms of encroachment, noise, accident zone, constraints, etc.	***Consistent.*** See response to Land Use Element Goal 6, above.
Goal 8: Preserve the natural beauty, minimize degradation of the March JPA planning area, and provide enhancement of environmental resources and scenic vistas.	***Consistent:*** As part of the CBD Settlement Agreement (Appendix S), the Project would establish 445.43 acres of undisturbed land surrounding the Specific Plan Area for conservation. The existing land use designation for the Conservation Easement is Business Park (BP) and Industrial (IND). Under the proposed Project, the Conservation Easement would be redesignated as Open Space – Conservation. The Conservation Easement would provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Thus, the Project designates more land for non-development uses. Moreover, this EIR analyzes the Project's potential impacts to aesthetics, such as impacts to scenic vistas. As further discussed in Section 4.1, Aesthetics, impacts to scenic vistas are anticipated to be less than significant with no mitigation required. For more discussion, see Section 4.1 of this EIR.
Policy 8.2: Sensitive biological resources and habitats, cultural resources, view shed areas shall be protected where practical.	***Consistent.*** As analyzed in Section 4.3, Biological Resources, impacts to biological resources were determined to either result in no impacts, less than significant impacts, or less than significant impacts with **MM-BIO-1** through **MM-BIO-9** incorporated. See Section 4.3 of this EIR for

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	more discussion. As detailed further in Section 4.4, Cultural Resources, even with the application of **MM-CUL-1** through **MM-CUL-9**, the Project would result in significant and unavoidable impacts to historical and archaeological resources. The Project proposes to preserve two of the bunkers of the Weapons Storage Area within open space. As further discussed in Section 4.1, Aesthetics, impacts to scenic vistas are anticipated to be less than significant with no mitigation required. For more discussion, see Section 4.1 of this EIR.
Policy 8.5: Pursue the release of lands designated as suitable endangered species habitat through a process of land trades for more and better habitat.	***Consistent.*** As discussed in Section 4.10.2, the Project site was originally identified as SKR Open Space/Management Area but planned for development through the March JPA General Plan. The Project site was released in exchange for additional lands in the Potrero Preserve (Appendix S).
Goal 9: Preserve the integrity of the historic and cultural resources of the planning area and provide for their enhancement.	***Partially Consistent:*** As part of the proposed Conservation Easement, no development or ground-distributing activities would occur. Thus, the Project would not have the potential to result in impacts to historic cultural resources within the Conservation Easement. However, development of the Specific Plan Area would result in impacts to historic and cultural resources. As detailed further in Section 4.4, Cultural Resources, even with the application of **MM-CUL-1** through **MM-CUL-9**, the Project would result in significant and unavoidable impacts to historical and archaeological resources. The Project proposes to preserve two of the bunkers of the Weapons Storage Area within open space. Given this, the Project would be partially consistent with this goal. For more discussion, see Section 4.4, Cultural Resources, of this EIR.
Goal 10: Avoid undue burdening of infrastructure, public facilities, and services by requiring new development to contribute to the improvement and development of the March JPA planning area.	***Consistent:*** Development of the proposed Project would contribute to the improvement and development of the March JPA planning area by completing all necessary on-site and off-site infrastructure (i.e., construction of the new 0.5-million-gallon ~~(MG)~~ reclaimed water storage tank on an existing pad adjacent to an existing WMWD water tank), by constructing the Meridian Fire Station, and by providing the required Development Impact Fees, which would contribute to required facilities and services. For more discussion on impacts associated with infrastructure, public services, and transportation, see Section 4.17, Utilities and Service Systems; Section 4.13, Public Services; and Section 4.15, Transportation, of this EIR.
Policy 10.1: Require new construction to pay its "fair share" of the cost of providing adequate public services, infrastructure, and facilities for the development.	***Consistent.*** The proposed Project would pay all the necessary DIF and fair-share fees associated with development. **PDF-TRA-4** requires the Project to pay its fair share towards the improvement measures provided in the Table 1-4, Summary of Improvements and Rough Order of Magnitude Costs, of the Traffic Analysis (Appendix N-2). While payment of fees would be conditioned as part of Project approval, the use of these fees to implement programs and street system improvements cannot be guaranteed by the Project itself.
Policy 10.2: Require new construction to provide adequate infrastructure to serve the development (i.e., curbs and gutters, sidewalks, street lights, water	***Consistent:*** The Project includes the installation of utility and roadway networks connecting to and throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5-million-gallon reclaimed water tank.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
service, sewer service, or septic systems, etc.) prior to initiation of use.	
Policy 10.3: Locate commercial and industrial development in areas where street rights-of-way and capacity are available, as well as sufficient infrastructure and public services.	***Consistent***. The Project will funnel business traffic east along Cactus Avenue towards I-215. As discussed in Section 4.13, Public Services, and Section 4.17, Utilities and Service Systems, there would be sufficient infrastructure and public services to serve the Project.
Policy 10.4: Facilitate the provision of public services, (i.e., sewer, water, streets, and public safety) to be provided in an efficient and cost-effective manner.	***Consistent.*** Development of the Project would occur in a logical pattern of growth through the guidance of a Specific Plan, compatible with adjacent land uses to the east and northeast. As discussed in Section 4.13, Public Services, and Section 4.17, Utilities and Service Systems, there would be sufficient infrastructure and public services to serve the Project.
Goal 11: Plan for the location of convenient and adequate public services to serve the existing and future development of March JPA planning area.	***Consistent***: As described in Section 4.13, Public Services, existing and planned public services can serve the Project without significant impacts and no mitigation is required. Incorporation of **MM-FIRE-1**, which would ensure adequate firebreaks and vegetation management is implemented prior to the issuance of grading and building permits (see Section 4.18, Wildfire for more details), would further reduce impacts related to fire protection services. Additionally, the Project would construct the Meridian Fire Station. ~~be subject to the payment of a DIF for applicable fire facilities. Pursuant to Ordinance No. JPA 15-01, the Project's DIF amount for fire facility fees would be determined and paid at the time building permits are issued. Payment of development fees by the Project Applicant would be used to offset the costs of capital improvements that could be required to maintain acceptable service ratios, response times, and other performance objectives.~~ In addition, the Project would be subject to the County's Structural Fire Tax, which would be used to offset the costs of increased operations and maintenance costs. ~~The payment of development fees, along with a payment dedicated in the amount of $1.25 million, made during the recently authorized Disposition and Development Agreement, would further reduce impacts.~~ ~~Similarly, as further discussed in Section 4.13, Public Services, the Project Applicant would pay DIF in the amount of $100,000 during the year the first mass grading permit is pulled as well as during the second year. The fees paid would account for any additional service patrols needed by the Sheriff's Department for the proposed Project.~~ ~~Furthermore, the Project would not interfere with the planned provision of adequate public services, including a new fire station at the northeast corner of Meridian Parkway and Opportunity Way.~~ As discussed in Section 4.15, Transportation, **PDF-TRA-3** directs the Project applicant to provide the March JPA with compensation of $100,000 to fund truck route enforcement for a period of 2 years, which allows more targeted enforcement of truck routes during the

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	initial phases of the Project as drivers become accustomed to the approved truck routes. The proposed Project includes a 60.28-acre park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. The currently existing service roads within the Conservation Easement would continue to be utilized by the public for passive recreation as authorized by the March JPA. For more discussion public services, see Section 4.13, Public Services, of this EIR.
Goal 12: Ensure, plan, and provide adequate infrastructure for all facility reuse and new development, including but not limited to, integrated infrastructure planning, financing, and implementation.	***Consistent:*** Utility infrastructure will be installed and expanded within the Specific Plan Area consistent with required facilities identified in the Specific Plan. These facilities are proposed to serve the Specific Plan Area and proposed infrastructure improvements would provide adequate infrastructure for proposed land uses through the Project's buildout. Such infrastructure improvements include the installation of utility and roadway networks throughout the Specific Plan Area, the construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5-million-gallon ~~MG~~ reclaimed water tank. Implementation of the Specific Plan would include compliance with proposed design guidelines as well as development standards, and procedures necessary to develop the Specific Plan Area consistent with the March JPA Development Code.
Policy 12.1: Coordinate the provision of all public utilities and services to ensure a consistent, complete and efficient system of service to development.	***Consistent.*** Development of the Project would occur in a logical pattern of growth through the guidance of a Specific Plan. As discussed in Section 4.13, Public Services, and Section 4.17, Utilities and Service Systems, there would be sufficient infrastructure and public services to serve the Project.
Policy 12.2: Require new construction to pay its "fair share" for the regional infrastructure system by providing appropriate dedications, improvements, and/or fee assessment districts or other financing mechanisms.	***Consistent.*** The Project would pay all the applicable TUMF, DIF and fair-share fees associated with development (see **PDF-TRA-4**). While payment of fees would be conditioned as part of Project approval, the use of these fees to implement programs and street system improvements cannot be guaranteed by the Project itself.
Policy 12.3: Require new development projects to provide for the extension of infrastructure to serve the development, including over-sizing facilities for future needs.	***Consistent.*** See response to Land Use Element Goal 12, above.
Policy 12.4: Preserve options and facilities to accommodate new and advanced technologies, inclusive of communication systems.	***Consistent.*** Figures 3-7F and 3-7G in Chapter 3, Project Description, of this EIR identify the telephone and cable TV backbones proposed for the Project.
Goal 13: Secure adequate water supply system capable of meeting normal and emergency demands for existing and future land uses.	***Consistent.*** The proposed Project would be served by an existing water supply system that would provide sufficient capacity to accommodate projected normal and emergency needs. As described in Chapter 3, the Project includes infrastructure improvements such as the

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	installation of utility and roadway networks throughout the Specific Plan Area and the construction of a new 0.5-million-gallon ~~MG~~ reclaimed water tank. As described further in Section 4.17, Utilities and Service Systems, of this EIR, Project impacts to utilities and service systems would be less than significant and no mitigation would be required. See Section 4.17, Utilities and Service Systems, for more discussion on water supplies and Project consistency with the Western Municipal Water District (WMWD) projections.
Policy 13.1: Only approve development which can demonstrate an adequate and secure water supply for the proposed use.	***Consistent.*** As discussed in Section 4.17, Utilities and Service Systems, WMWD has determined that adequate water supplies exist to serve the proposed Project.
Policy 13.2: Enhance local groundwater supplies through development designs which promote an on-site recharge and minimize impermeable ground coverage with landscaped areas, open space, or recreation areas.	***Consistent.*** As explained in Section 4.9, Hydrology and Water Quality, the Project site is not conducive to substantial groundwater recharge. The underlying soils of the Project site preclude the use of shallow infiltration-based design components. Geotechnically, infiltration is not ideal on hilltops because introducing groundwater into a sloped condition can have adverse effects on soil stability.
Policy 13.3: Design and operate March JPA facilities in compliance with established water conservation practices and programs.	***Consistent.*** See response to Land Use Element Goal 13, above.
Goal 14: Establish, extend, maintain, and finance a safe and efficient wastewater collection, treatment, and disposal system, which maximizes treatment and water recharges, minimizes water use, and prevents groundwater contamination.	***Consistent.*** The proposed Project would provide the necessary facilities to establish a wastewater collection, treatment, and disposal system. As described in Chapter 3, the Project includes infrastructure improvements such as the installation of utility and roadway networks throughout the Specific Plan Area and the construction of a new sewer lift station. Project impacts to utilities and service systems would be less than significant, and no mitigation is required. See Section 4.17, Utilities and Service Systems, of this EIR for more discussion on the Project's impact to existing sewer infrastructure and WMWD's treatment capacity.
Policy 14.1: Require all development to adequately collect, treat, and dispose of wastewater in accordance with the Santa Ana Regional Water Quality Control Board requirements.	***Consistent.*** The Project would treat and dispose of wastewater in conformance with the requirements of the Santa Ana RWQCB.
Policy 14.2: Require connection to the sewer system for any development occurring on land formerly part of March AFB.	***Consistent.*** As shown in Figure 3-7A, Sewer System, in this EIR, the Project's sewer system will connect with existing sewer systems.
Policy 14.3: Encourage the reuse of reclaimed and treated non-potable water for irrigation and maintenance of recreation areas, landscaping and open space preservation.	***Consistent.*** The Project includes the construction of 0.5-million-gallon reclaimed water tank. Figure 3-7C in this EIR details the Project's reclaimed water system, which would provide reclaimed water to the Campus Development for irrigation purposes so as to reduce the dependence and reliance upon potable water for landscaping and irrigation.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Goal 15: In compliance with state law, ensure solid waste collection, siting, and construction of transfer and/or disposal facilities, operation of waste reduction and recycling programs, and household hazardous waste disposal programs and education are consistent with the County Solid Waste Management Plan.	***Consistent.*** The proposed Project would comply with the Countywide Integrated Waste Management Plan, in accordance with Assembly Bill 939. Project impacts to solid waste/hazardous waste collection and disposal would be less than significant, and no mitigation is required. See Section 4.17, Utilities and Service Systems, of this EIR for more discussion.
Policy 15.1: Ensure all hazardous materials are stored, treated, and disposed in accordance with state and federal law.	***Consistent.*** Implementation of **MM-HAZ-1** (Abatement of Hazardous Building Materials) would ensure the demolition and disposal of the Weapons Storage Area and ancillary materials is conducted in a safe manner in accordance with all applicable laws and regulations. As discussed in Section 4.8, Hazards and Hazardous Materials, on-site storage of all hazardous materials, including fuels, would be required to adhere to facility-specific hazardous materials business plans. See Section 4.8 for further discussion.
Policy 15.2: Support programs to promote greater awareness and involvement in waste reduction and recycling.	***Consistent.*** **MM-AQ-22** requires all industrial tenants provide to employees and truck drivers, as appropriate, information regarding building energy efficiency, solid waste reduction, recycling, and water conservation.
Goal 16: Adequate supplies of natural gas and electricity from utility purveyors and the availability of communications services shall be provided within the March JPA planning area.	***Consistent.*** As described in Chapter 3, the Project includes infrastructure improvements such as the installation of utility and roadway networks throughout the Specific Plan Area and the construction of a new electrical substation. The Project will not use natural gas. Although the Specific Plan would not use natural gas, conceptual utility plans (Figure 3-7H of this EIR) indicate that Campus Development would result in the buildout of on-site natural gas infrastructure. A natural gas line would be connected to existing facilities stubbed out at the western terminus of Cactus Avenue. Upgrades would be confined to the Specific Plan Area and not to any centralized facilities. See Section 4.17, Utilities and Service Systems, of this EIR for more discussion on supplies and service.
Policy 16.1: Where feasible, require new development to underground on-site telecommunications connections.	***Consistent.*** The Project will underground on-site telecommunications connections.
Policy 16.2: Encourage and support the under grounding of existing overhead utilities.	***Consistent.*** The Project will underground on-site utilities.
Policy 16.3: Accommodate advancing technologies with communication systems, inclusive of fiber-optics and high speed transmission lines.	***Consistent.*** Figures 3-7F and 3-7G of this EIR identify the telephone and cable TV backbones proposed for the Project.
Policy 16.4: Prepare a capital improvement program (CIP) which provides for the maintenance and upgrading of existing infrastructure to adequate levels of service and the installation of new facilities, as needed.	***Consistent.*** Table 7-1 of the proposed Specific Plan outlines the maintenance responsibilities for the public facilities and infrastructure, which will be managed through either a Landscape and Lighting Maintenance District or a Community Facilities District, at March JPA's discretion.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Policy 16.5: Encourage the preparation and adoption of CIPs for other agencies and districts responsible for the provision of infrastructure systems in the March JPA Planning Area.	***Consistent.*** The Project will not impede the preparation and adoption of any other jurisdiction's CIPs.
Goal 17: Adequate flood control facilities shall be provided prior to, and concurrent with, development in order to protect the lives and property within the March JPA planning area.	***Consistent.*** The Project would provide drainage facilities on site necessary for adequate flood control. Potentially significant impacts are anticipated to occur related to surface runoff and potential flooding, as further described in Section 4.9, Hydrology and Water Quality, of this EIR. However, the incorporation of **MM-HYD-3** would reduce impacts to a less than significant level. See Section 4.9, Hydrology and Water Quality, of this EIR for more discussion.
Policy 17.1: Provide for the adequate drainage of storm runoff to protect the lives and property within the Planning Area.	***Consistent.*** See response to Land Use Element Goal 17, above.
Policy 17.2: Monitor and maintain drainage and flood control facilities to ensure adequate capacity to support the land use plan.	***Consistent.*** See response to Land Use Element Goal 17, above.
Policy 17.3: Require new development to construct new or upgrade existing drainage facilities to accommodate the additional storm runoff caused by the development.	***Consistent.*** See response to Land Use Element Goal 17, above.
Policy 17.4: Require all storm drain and flood control facilities to be approved and operational prior to the issuance of certificates of occupancy for the associated development.	***Consistent.*** See response to Land Use Element Goal 17, above.
Policy 17.5: Designate and preserve land for necessary flood control facilities, in accordance with a certified hydrology study and master plan for March JPA Planning Area.	***Consistent.*** See response to Land Use Element Goal 17, above.
Policy 17.6: Ensure development within the 100-year flood plain, as designated by the Federal Emergency Management Agency (FEMA), shall be consistent with the requirements established by FEMA.	***Consistent.*** See response to Land Use Element Goal 17, above.
Policy 17.7: Seek to preserve drainage courses in their natural condition, while providing adequate safety and protection of property.	***Consistent.*** Appropriate permit(s) from the federal, state, regional, and local permitting agencies would be obtained to address the on-site drainage and protect persons and property.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Transportation Element	
Goal 1: Establish and provide for a comprehensive transportation system that captures the assets and opportunities of the planning area, existing transportation facilities, and planned transportation facilities for the future growth and development of the planning area and sub-region.	***Consistent.*** The proposed Project would not inhibit March JPA from complying with this goal. As demonstrated in this EIR, the Project includes transportation improvements consistent with the March JPA General Plan. Proposed improvements within the Specific Plan Area and proposed off-site improvements (included as **PDF-TRA-1** and **PDF-TRA-2**) would result in access to multi-modal transportation facilities within the Project site. Implementation of the Project through the buildout of the Specific Plan would ensure development would not impact operations or safety on roadways in the Project site's vicinity. As further discussed in Section 4.15, Transportation, the Project would result in a less than significant transportation impacts with the incorporation of **MM-TRA-1** and **MM-TRA-2**. Moreover, with the implementation of proposed improvements (e.g., **PDF-TRA-1** and **PDF-TRA-2**) such as constructing adequate on-site roadways and by the way of paying fair share towards operational improvements warranted, identified in the Appendix N, the Project would not inhibit this goal. See Section 4.15, Transportation, and Appendix ~~K WCUP~~ N, West Campus Upper Plateau Traffic Analysis, of this EIR for more discussion.
Goal 2: Build and maintain a transportation system which capitalizes on the multifaceted elements of transportation planning and systems, designed to meet the needs of the planning area, while minimizing negative effects on air quality, the environment and adjacent land uses and jurisdictions.	***Partially Consistent.*** The Specific Plan Area would be served by the existing transportation system within March JPA and surrounding jurisdictions. The Project would not inhibit the buildout and maintenance of the transportation system. The Specific Plan Area would be served by both local transit service and inter-city passenger rail service. The closest bus stop is located on Alessandro Boulevard to the north and the closest Metrolink passenger rail transit station is located approximately 1.5 miles from the Campus Development. **MM-GHG-11** provides funding for a bus shelter on Alessandro Blvd. In addition, ~~4- to-~~6-foot bike lanes are proposed on all Specific Plan Area roadways and ~~4- to-~~6-foot sidewalks within the Specific Plan Area would enhance connectivity. The Project would accommodate existing and future local transit service, bicycle lanes, and pedestrian facilities. As discussed in Section 4.15, Transportation, **MM-TRA-1** and **MM-TRA-2** would be incorporated to reduce impacts related to construction and operation of the Specific Plan Area to a less than significant level. See Section 4.15, Transportation, of this EIR for more discussion. However, as demonstrated in Section 4.2, Air Quality, the Project would exceed regional thresholds of significance for operational emissions. **MM-AQ-52** ~~2~~ through **MM-AQ-27**~~15~~ are designed to reduce Specific Plan operational-source VOCs, NO_x, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions. However, because the effects of these mitigation measures cannot be meaningfully quantified, impacts would be significant and unavoidable.
Policy 2.1: March JPA shall balance the need for free traffic flow with economic realities and environmental and aesthetic consideration, such that transportation facilities are capable of normal patterns and volume, with tolerance of peak and	***Consistent.*** The construction of proposed infrastructure improvements (**PDF-TRA-1**) would provide transportation capacity to existing and future demand. As described further in Section 4.15, Transportation, the Project would result in a less than significant vehicle miles traveled (VMT) impact. Although consistency with General Plan level of service (LOS) standards is not a CEQA requirement, to meet the minimum acceptable LOS and deficiency criteria of each jurisdiction,

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
high level usage with minimal disruption, delays or impacts.	improvements, along with the Project's fair share contribution, have been included in Table 1-4 of the Traffic Analysis (Appendix N-2).
Policy 2.6: March JPA shall balance the need for free traffic flow with economic realities and environmental and aesthetic consideration, such that transportation facilities are capable of normal patterns and volume, with tolerance of peak and high level usage with minimal disruption, delays or impacts.	***Consistent.*** See response to Transportation Element Policy 2.1, above
Policy 2.7: On-street parking shall be de-emphasized throughout the planning area to permit maximum capacity of roadways to be actuated by vehicular and bicycle transportation modes.	***Consistent.*** The proposed Specific Plan provides parking ratios that will limit the potential for parking spillover. Furthermore, on-street parking will be prohibited due to striped bike lanes and no parking signs.
Goal 3: Develop a transportation system that is safe, convenient, efficient and provides adequate capacity to meet local and regional demands.	***Consistent.*** As described in Chapter 3, Project Description, and **PDF-TRA-1**, the Specific Plan Area would be accessed through the extension of existing streets that have been planned in the March JPA General Plan and the City of Riverside General Plan. Access to the Specific Plan Area from the east would be provided via Cactus Avenue, which would be extended to the west from its current western terminus through the Specific Plan Area to Airman Drive. Cactus Avenue will not extend west of Airman Drive to Barton Street; however, a gated emergency vehicle access (EVA) only connection will be maintained and not be accessible by any vehicular traffic. Access to the Specific Plan Area from the north would be via Brown Street, which would be extended to the south to connect from Alessandro Boulevard to the new extension of Cactus Avenue. ~~The~~ Only the Park and open space amenities would be accessible from the north and south by extending Barton Street to connect from Alessandro Boulevard in the north to Grove Community Drive in the south. The construction of proposed infrastructure improvements would provide transportation capacity to existing and future demand. As described further in Section 4.15, Transportation, the Project would result in a less than significant VMT impact. Although consistency with General Plan ~~level of service (~~LOS~~)~~ standards is not a CEQA requirement, to meet the minimum acceptable LOS and deficiency criteria of each jurisdiction, improvements, along with the Project's fair share contribution have been included in Table 1-4 of the Traffic Analysis (Appendix N-2). With the implementation of these proposed improvements such as constructing adequate on-site roadways (**PDF-TRA-1**) and by paying fair share towards operational improvements warranted, identified in the Table 1-4 of the Traffic Analysis, the Project would maintain and develop a transportation system that is safe, convenient, efficient and provides adequate capacity to meet local and regional demands.
Policy 3.5: Driveway entrances onto surrounding arterial highways, major and minor arterial streets should be	***Consistent.*** Pursuant to Section 3.5.3, Driveway Widths and Locations, of the proposed Specific Plan, driveway spacing shall either be in conformance with the Riverside County Road Standards and

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
restricted when practical, and through traffic on interior streets should be minimized.	Specifications (Ord. 461, as amended) or as approved by the March JPA Civil Engineer.
Goal 4: Provide a balanced transportation system that ensures the safe and efficient movement of people and goods throughout the planning area, while minimizing the use of land for transportation facilities.	***Consistent:*** Specific Plan Area internal streets would accommodate projected future traffic in an efficient manner. Roadway improvements for roadways would be consistent with the March JPA's Road Improvement Standards and Specifications. Policy 4.3 requires that arterial roadways should be planned and improved to maintain a ~~level of service (~~LOS~~)~~ "D" or better with limiting circumstances of LOS "E" to occur and Policy 4.5 requires the dedication and improvement of arterial roadways prior to the issuance of certificates of occupancy. **PDF-TRA-1** identifies the on-site and off-site adjacent roadway improvements incorporated into the Project to accommodate site access. Although consistency with General Plan ~~level of service (~~LOS~~)~~ standards is not a CEQA requirement, to meet the minimum acceptable LOS and deficiency criteria of each jurisdiction, improvements, along with the Project's fair share contribution have been included in Table 1-4 of the Traffic Analysis (Appendix N-2). The fair share contribution will be imposed as Conditions of Approval as part of the Project approval. See Section 4.15, Transportation, and Appendix N-2 Traffic Analysis of this EIR for more discussion.
Policy 4.3: Arterial roads should carry both local and through traffic and be planned and improved to maintain a Level of Service "D" or better with limiting circumstances of Level of Service "E" to occur.	***Consistent.*** As described further in Section 4.15, Transportation, the Project would result in a less than significant VMT impact. Although consistency with General Plan LOS standards is not a CEQA requirement, to meet the minimum acceptable LOS and deficiency criteria of each jurisdiction, improvements, along with the Project's fair share contribution, have been included in Table 1-4 of the Traffic Analysis (Appendix N-2).
Policy 4.4: Through traffic planning, measures should be implemented to alleviate direct impacts to adjoining jurisdictions which decrease roadway function Level of Service below the jurisdiction's adopted accepted Level of Service, as appropriate.	***Consistent.*** See response to Transportation Element Policy 4.3, above.
Policy 4.5: Require the dedication and improvement of arterial roadways prior to the issuance of certificates of occupancy.	***Consistent.*** Curb-to-curb roadway improvements will be dedicated to March JPA and will be in place prior to the issuance of any Certificate of Occupancy.
Goal 5: Plan and encourage land use patterns and designs, which enhance opportunities for non-vehicular circulation and improve trip reduction strategies.	***Consistent.*** Site plans for individual buildings would be reviewed during the plan check process to ensure that pedestrian, bicycle, and transit access is facilitated. The Specific Plan Area includes a bicycle and pedestrian circulation network to connect to existing facilities and provide internal access. At Project buildout, sidewalks would be constructed on all internal roadways along the individual parcel's frontage. In addition, ~~4- to-~~6-foot bike lanes and ~~4- to-~~6-foot sidewalks would be included on internal streets such as Linebacker Drive, Airman Drive, Bunker Hill Drive, and Arclight Drive. As demonstrated in Section 4.15, Transportation, **MM-TRA-1** and **MM-TRA-2** would be incorporated to reduce impacts related to construction and

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	development of the Specific Plan to a less than significant level. The Project would result in a less than significant VMT impact. See Section 4.15, Transportation, for more discussion.
Goal 6: Establish vehicular access control policies in order to maintain and insure the effectiveness and capacity of arterial roadways.	***Consistent.*** Access to the Project site would be via Cactus Avenue, Brown Street, and Barton Street, which are classified as major Arterial and Industrial Collector Streets according to the General Plan. Project internal roadways would be designed in accordance with the March JPA Road Improvement Standards and Specifications and would be built per ultimate cross-section requirements. With the implementation of the improvements identified in **PDF-TRA-1** and by the way of paying fair share towards operational improvements warranted, identified in the Appendix N, the Project would be consistent with this goal. See Section 4.15, Transportation, and Appendix N of this EIR for more discussion.
Policy 6.1: To the extent possible, access shall be provided on local or collector streets where the frontage is available on both local and arterials streets.	***Consistent.*** Access to Project uses shall be available from the proposed local and collector streets throughout the Specific Plan Area.
Policy 6.2: Access to an arterial road shall be limited to one point for every 300 feet of frontage or one point for parcels with less than 300 feet of frontage.	***Consistent.*** Pursuant to Section 3.5.3, Driveway Widths and Locations, of the proposed Specific Plan, driveway spacing shall either be in conformance with the Riverside County Road Standards and Specifications (Ord. 461, as amended) or as approved by the March JPA Civil Engineer.
Policy 6.4: For corner lots, whenever possible, vehicular access points on arterial roadways shall be located a minimum of 300 feet from the centerline of the intersection.	***Consistent.*** See response to Transportation Element Policy 6.2, above.
Goal 7: Facilitate and develop transportation demand management and transportation systems management programs, and use of alternate transportation modes.	***Consistent.*** The proposed Project's impacts related to transportation demand management and alternative transportation modes are further discussed in Section 4.15, Transportation, of EIR. As demonstrated in Section 4.15, Transportation, **MM-TRA-1** and **MM-TRA-2** would be incorporated to reduce impacts related to construction and development of the Specific Plan to a less than significant level. On-site roadways such Linebacker Drive, Airman Drive, Bunker Hill Drive, and Arclight Drive would be constructed with bike and pedestrian facilities, which would provide direct access to the proposed Specific Plan Area uses. The Project would construct a 10-foot-wide multi-purpose trail along the western side of Barton Street fronting the Park. RTA routes 20 and 27 and the Perris Valley Metrolink Station provide transit service in proximity to the Specific Plan Area. **MM-GHG-11** provides funding for a bus shelter on Alessandro Blvd. See Section 4.15, Transportation, for more discussion.
Goal 8: Adequate, affordable, equitably distributed and energy efficient public and mass transit services which promote the mobility	***Consistent.*** The Project site would be served by both local transit service and inter-city passenger rail service. The local transit system of bus stops and bus shelters would be approved by the Riverside Transit Agency. The closest bus stop is located on Alessandro Boulevard to the north of the Project site. **MM-GHG-11** provides funding for a bus

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Goal/Policy	Consistency Analysis
to, from, and within the planning area shall be provided.	shelter on Alessandro Blvd. The Metrolink passenger rail transit facility is located approximately 1.5 miles from the Campus Development. The ~~4- to~~ 6-foot bike lanes on all Project roadways and ~~4- to~~ 6-foot sidewalks within the Project would enhance connectivity to the existing Metrolink Station. No impact would occur to public and mass transit services. During construction, the Project would be required to implement **MM-TRA-1** to reduce the impact of construction activities to the circulation system to a less than significant level. See Section 4.15, Transportation, of this EIR for more discussion.
Policy 8.8: Require the installation of bus improvements such as bus turnouts, bus stops, and terminals as part of the conditions of development for employment centers and land uses that attract large numbers of persons, where appropriate.	***Consistent.*** RTA routes 20 and 27 and the Perris Valley Metrolink Station provide transit service in proximity to the Specific Plan Area. **MM-GHG-11** provides funding for a bus shelter on Alessandro Boulevard.
Goal 9: Develop measures which will reduce the number of vehicle-miles traveled during peak travel periods.	***Consistent.*** Buildout of the Specific Plan would provide new job opportunities to residents in the region and maintain the jobs/housing balance. The proposed Project would reduce commutes to surrounding areas and reduce vehicle miles traveled associated with longer commutes. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-2~~1~~9** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. See Section 4.15, Transportation, of this EIR for more discussion.
Goal 10: Regulate the travel of trucks on March JPA planning area streets.	***Consistent.*** The Project is designed to accommodate truck traffic. As described in Chapter 3, Project Description, and **PDF-TRA-2**, truck routes are proposed along Cactus Avenue to I-215, as well as along Linebacker Drive, Arclight Drive, Airman Drive, and Bunker Hill Drive (Figure 3-4, Proposed Truck Routes). Truck access would not be permitted along Barton Street. Cactus Avenue will not extend west of Airman Drive to Barton Street; however, a gated emergency vehicle access (EVA) only connection will be maintained and not be accessible by any vehicular traffic. To enforce the utilization of the approved truck routes, March JPA contracts with the Sheriff's Department for 40 hours of patrol service per week and truck route enforcement paid through an existing truck route mitigation fund. As discussed in Section 4.15, Transportation, **PDF-TRA-3** directs the Project applicant to provide the March JPA with compensation of $100,000 to fund truck route enforcement for a period of 2 years, which allows more targeted enforcement of truck routes during the initial phases of the Project as drivers become accustomed to the approved truck routes. See Section 4.15, Transportation, of this EIR for discussion.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Policy 10.1: Establish a truck route system which designates truck and commercial vehicle routes and provides adequately sized and designed roadways to meet the needs of trucks and commercial vehicles. This will eliminate truck and commercial vehicle traffic through inappropriate areas of the March JPA Planning Area.	***Consistent.*** Internal Project roadways of Linebacker Drive, Arclight Drive, Bunker Hill Drive, and Airman Drive will also be truck routes. No truck access will be permitted along Barton Street. The Project will be designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development will only be accessed via Cactus Avenue. Under **PDF-TRA-1**, Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately 0.25 miles and 0.5 miles, respectively, directly past the next cross-street, Meridian Parkway.
Goal 11: Adequate off-street parking for all land uses shall be provided which requires adequate on-site parking to prevent spill over on the adjacent street system.	***Consistent.*** Proposed parking lots associated with the Specific Plan's buildout would be reviewed and approved by March JPA's planning and engineering staff during the plan check and permitting process in accordance with the development standards outlined in the Specific Plan. See the West Campus Upper Plateau Specific Plan for more details on off-street parking standards.
Goal 12: Plan for and seek to establish and areawide system of bicycling trails, with linkages within the planning area and with adjacent jurisdictions, and in compliance with sub-regional plans.	***Consistent.*** The Specific Plan Area would include a roadway network that would provide for bicycle lanes on all streets. See Section 4.15, Transportation, of this EIR for more discussion on the Project's compatibility with the circulation system.
Policy 12.5: Provide adequate right-of-way and improvements for bike lanes in accordance with the Transportation Plan.	***Consistent.*** Figure 5-3, Non-Motorized Circulation Plan, of the proposed Specific Plan identifies the bike lanes throughout the Specific Plan Area. As shown on Figure 5-1, Circulation Plan, all roadways within the Specific Plan Area will have dual 6-foot-wide bike lanes.
Policy 12.7: Require sidewalks on both sides of all streets. The March JPA encourages alternate designs including parkways and meandering and enhanced paving.	***Consistent.*** Figure 5-3, Non-Motorized Circulation Plan, of the proposed Specific Plan identifies the sidewalks throughout the Specific Plan Area. It also shows the 10-foot-wide multi-use trail along the Barton Street extension.
Goal 13: Promote, preserve, and protect the joint use of the aviation field by the Air Force Reserves and civilian aviation.	***Consistent.*** The Specific Plan Area is located within Compatibility Zones C1 and C2 of the March ARB/Inland Port Airport. The uses proposed within the Specific Plan Area are all consistent with allowable uses in Compatibility Zones C1 and C2 and would therefore not have any negative effects on the operation of the joint use of the aviation field. See discussion within this Section under Riverside County Airport Land Use Compatibility Plan for consistency analysis with the ALUCP. As further discussed below, the FAA determined the proposed structures do not exceed obstruction standards and would not be a hazard to air navigation, subject to conditions which have been included as **PDF-HAZ-1**, discussion below and in Section 4.8, Hazards and Hazardous Materials, of this EIR (Appendix L). No substantial adverse effect on the safe and efficient utilization of navigable airspace by aircraft or on the operation of air navigation facilities. Furthermore, see Section 4.8, Hazards and Hazardous Materials, and Section 4.11, Noise, of this EIR for more discussion.

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Goal/Policy	Consistency Analysis
Goal 14: Goods movement through the San Jacinto Rail Branchline shall be capitalized.	***Consistent.*** Implementation of the Specific Plan would not inhibit this goal as the Project site is not located near the San Jacinto Rail Branchline. Therefore, the Project would not affect the goods movement.
Goal 15: In accordance with state and federal law, promote and provide mobility for the disabled.	***Consistent:*** Development plans and public improvement plans would comply with the accessibility requirements of the Americans with Disabilities Act. This goal would not be inhibited by the implementation of the Specific Plan.
Policy 15.1: Require that all development comply with the requirements of the state and federal law for the disabled. Requirements may include ramps at street corners, access to public buildings, traffic signal timing and the like.	***Consistent.*** The proposed Project would comply with all applicable Americans with Disabilities Act (ADA) requirements as required by federal and state law.
Noise Element	
Goal 1: Ensure that land uses are protected from excessive and unwanted noise.	***Consistent.*** Specific Plan Area development would be consistent with the land use limitations established in the Riverside County ALUCP (as demonstrated below). See Section 4.11, Noise, of this EIR for more discussion.
Policy 1.1: Establish acceptable limits of noise for various land uses throughout the March JPA Planning Area. Future development that could increase ambient noise levels shall be required to mitigate the anticipated noise increase, to the extent possible.	***Consistent.*** As demonstrated in the Section 4.11, Noise, the Project would result in less than significant impacts related to construction and operational activities associated with the Specific Plan Area buildout. However, the Project would result in significant and unavoidable impacts related to traffic noise increases along Cactus Avenue east of Meridian Parkway (Segment #13 – non-sensitive land use). No feasible mitigation measures are available to reduce this impact to a less than significant level.
Policy 1.2: Noise sensitive uses (such as schools, libraries, hospitals, medical facilities, residential uses, etc.) shall be discouraged in areas where noise levels exceed acceptable limits.	***Consistent.*** Table 3-1 of the proposed Specific Plan identifies permitted, conditional, and ancillary uses allowed in each land use designation. The Riverside County Airport Land Use Commission conditions of approval restrict/prohibit children's schools, libraries, hospitals, skilled nursing facilities, and public assembly. These noise sensitive uses are not proposed.
Policy 1.3: Encourage good acoustical design in new construction.	***Consistent.*** Section 4.4.2, Truck Courts and Loading Docks, of the proposed Specific Plan requires truck courts and loading docks to be oriented away or screened to reduce visibility public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses. Section 4.4.1 Walls and Fences, requires 14-foot-tall screen walls around all truck courts and loading docks, which will further reduce Project on-site noise. Figure 4-1 of the Specific Plan details the landscape fence and wall plan.
Policy 1.4: Provide buffer areas between noise sources and other developments, where practical.	***Consistent.*** The Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. In addition to Conservation Easement, there is an additional 120-foot landscaped buffer interface on the north side of the Specific Plan Area (see

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	Figure 4-17 of the proposed Specific Plan). The Conservation Easement would remain as permanent open space.
Goal 2: Minimize incompatible noise level exposures throughout the planning area, and where possible, mitigate the effect of noise incompatibilities to provide a safe and healthy environment.	***Partially Consistent.*** As demonstrated in the Section 4.11, Noise, the Project would result in less than significant impacts related to construction and operational activities associated with the Specific Plan Area buildout. However, the Project would result in significant and unavoidable impacts related to traffic noise increases along Cactus Avenue east of Meridian Parkway (Segment #13 – non-sensitive land use). No feasible mitigation measures are available to reduce this impact to a less than significant level. However, the Project would be consistent with the land use limitations established in the ALUCP. See discussion within this Section under Riverside County Airport Land Use Compatibility Plan for consistency analysis with the ALUCP as well as Appendix L. See Section 4.11, Noise, of this EIR for more discussion.
Policy 2.1: Avoid placing noise sensitive land uses in proximity to areas devoted to noise generating facilities such as areas of aviation related activities, industrial parks, transportation facilities, and other noise generating land uses.	***Consistent.*** Table 3-1 of the proposed Specific Plan identifies permitted, conditional, and ancillary uses allowed in each land use designation. Noise sensitive uses are not proposed.
Policy 2.2: Noise generating facilities shall be located in areas with compatible noise generating land uses (i.e., airport noise contour areas) to minimize land use incompatibilities, noise abatement and mitigation measures needed.	***Consistent.*** As demonstrated in the Section 4.11, Noise, the Project would result in less than significant impacts related to construction and operational activities associated with the Specific Plan Area buildout. Table 3-2, Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 SF to be set back a minimum of 800 feet from residential and buildings 100,000 SF or less to be set back a minimum of 300 feet from residential. Industrial buildings greater than 200,000 SF must be set back a minimum of 1,000 feet from residential. In addition, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 4.4.1, Walls and Fences, of the Specific Plan requires 14-foot-tall screen walls around all truck courts and loading docks, which will further reduce Project on-site noise. Figure 4-1 of the Specific Plan details the landscape fence and wall plan.
Policy 2.3: Noise sensitive land uses shall not be located in areas influenced by noise generating land uses, in particular the noise contours associated with the joint use airfield, unless appropriate mitigation is utilized.	***Consistent.*** See response to Noise Element Policy 2.1, above.
Policy 2.4: March JPA shall evaluate noise sensitivity and noise generation when considering land use projects and transportation improvement projects and where appropriate mitigation measures shall be employed.	***Consistent.*** See response to Noise Element Goal 2, above.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Policy 2.5: March JPA shall utilize and comply with the CALTRANS standards for noise compatibility for aviation generated noise to proposed land use development.	***Consistent.*** The Specific Plan Area is located within Compatibility Zones C1 and C2 of the March ARB/Inland Port Airport. The uses proposed within the Specific Plan Area are all consistent with allowable uses in Compatibility Zones C1 and C2 and would therefore not have any negative effects on the operation of the joint use of the aviation field. See discussion within this section under Riverside County Airport Land Use Compatibility Plan for consistency analysis with the ALUCP.
Goal 3: Work toward the reduction of noise impacts from vehicular traffic, and aviation and rail operations.	***Partially Consistent***. As further described in Section 4.11, Noise, of this EIR, the Project would result in significant and unavoidable impacts related to traffic noise level increases along Cactus Avenue east of Meridian Parkway (Segment #13 – non-sensitive land use). No feasible mitigation measures exist to reduce this impact. However, all other noise impacts associated with the construction and operation of the Specific Plan Area would be less than significant. Therefore, the Project would conflict with this goal specifically related to vehicular traffic. No aviation or rail operations are proposed for the Project's use. As such, the Project would be partially consistent with this goal for reducing noise impacts.
Policy 3.1: Include mitigating measures such as landscaping, berming and site orientation, in the design of Projects located near noise generating sources such as arterial roadways.	***Consistent.*** The Project does not propose any noise sensitive land uses. As required by the proposed Specific Plan, roadways would include trees and landscaping along sidewalks. The Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. In addition to Conservation Easement, there is an additional 120-foot landscaped buffer interface on the north side of the Specific Plan Area (see Figure 4-17 of the proposed Specific Plan). The Conservation Easement would remain as permanent open space.
Policy 3.2: Coordinate with adjacent cities and county agencies for noise abatement.	***Consistent.*** As discussed in Section 4.11, Noise, the Project will result in less than significant noise impacts to sensitive receptors during construction and operation.
Policy 3.3: Adhere to the adopted AICUZ and Comprehensive Land Use Plan standards and promote the use of newer and quieter aircraft and support equipment.	***Consistent.*** The Project complies with the AICUZ and ALUCP.
Policy 3.4: Where appropriate, noise mitigation measures shall be incorporated in the design and approval of development on property located adjacent to aviation and rail facilities.	***Consistent.*** The Project site is not adjacent to aviation and rail facilities.
Policy 3.5: Where appropriate, development in areas adjacent to freeways, arterial streets, and other noise source shall be designed to reduce the potential for noise impacts.	***Consistent.*** See response to Noise Element Policy 3.1, above.
Policy 3.6: Regulate the use of local streets by trucks, trailers, and	***Consistent.*** The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
construction vehicles, to the extent possible.	parcels within the Campus Development can only be accessed via Cactus Avenue. Leaving the Campus Development, Brown Street would be the first cross-street. Cactus Avenue will be channelized or otherwise signed to prevent trucks from turning left onto Brown Street. Further, the intersection of Alessandro Boulevard and Brown Street is channelized and signed to prevent trucks from turn left and traveling west on Alessandro Boulevard. The Cactus Avenue ramps onto southbound I-215 and northbound I-215 are approximately 0.25 miles and 0.5 miles, respectively, directly past the next cross-street, Meridian Parkway.
Policy 3.7: Limit trucking operations to appropriate routes, times and speeds.	***Consistent.*** See response to Noise Element Policy 3.6, above. Noise times were not restricted because significant noise impacts would not occur at sensitive receptors, due to distances and the use of 14-foot walls.
Policy 3.8: Appropriate muffling systems for construction equipment and operations shall be required, as necessary.	***Consistent.*** **MM-AQ-3** requires all construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records on site and available to regulatory authorities upon request.
Policy 3.9: March JPA shall encourage and facilitate the use of mass transit services and alternative transportation systems to minimize dependence of the automobile within the Planning Area, thereby minimizing the level of noise generated by surface transportation.	***Consistent.*** Figure 5-3, Non-Motorized Circulation Plan, of the Specific Plan identifies the bike lanes and sidewalks throughout the Specific Plan Area. **MM-AQ-21** requires all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes; shuttle service to/from public transit and commercial/food establishments, if warranted; a guaranteed ride home; and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard.
Air Quality Element	
Goal 2: Reduce emissions associated with vehicle miles traveled by enhancing the jobs/housing balance of the subregion of Western Riverside County.	***Partially Consistent.*** The Specific Plan Area provides employment opportunities to continue to address the jobs/housing balance in western Riverside County. Residents could work locally, rather than commute to surrounding areas. Reduced commutes would result in reductions in total vehicle miles traveled, thus reducing air emissions. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-219** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. However, as demonstrated in Section 4.2, Air Quality, the Project would exceed regional thresholds of significance for operational emissions. The majority of the Project's operational emissions would be derived from the mobile sources, thus resulting in significant and unavoidable impacts even

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	with the incorporation of **MM-AQ-5~~2~~** through **MM-AQ-27~~15~~**. See Section 4.2, Air Quality, and Section 4.15, Transportation, of this EIR for more discussion.
Goal 3: Reduce air pollution through proper land use, transportation, and energy use planning.	***Partially Consistent.*** As detailed in Section 4.7, Greenhouse Gas Emissions, of this EIR, the Specific Plan is anticipated to result in less than significant GHG impacts with **MM-GHG-1** through **MM-GHG-11** incorporated. As discussed in Section 4.2, Air Quality, the Project's operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOx, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions. **MM-AQ-5~~2~~** through **MM-AQ-27~~15~~** are designed to reduce Project operational-source VOCs, NOx, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions. However, because the effects of these mitigation measures cannot be meaningfully quantified, impacts would be significant and unavoidable. Therefore, the Project would have the potential to conflict with the AQMP, and the Project would conflict with this goal to reduce air pollution through land use, transportation, and energy use planning. However, the proposed Project would provide employment opportunities to western Riverside County, and as detailed in Section 4.12, Population and Housing, the Project would maintain the County's balanced jobs-to-housing ratio. As such, residents could work locally, rather than commute to surrounding areas. Reduced commutes would result in reductions in total vehicle miles traveled, thus reducing air emissions. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-2~~1~~9** further reduces VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes, shuttle service to/from public transit and commercial/food establishments, if warranted, guarantee a ride home, and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. All impacts transportation-related and energy-related impacts would be less than significant or reduced to a level below significance, as further described in Section 4.5, Energy, and 4.15, Transportation, of this EIR.
Goal 4: Pursue reduced emissions for stationary and mobile sources through the use and implementation of new and advancing technologies.	***Consistent:*** As detailed in Section 4.2, Air Quality, **MM-AQ-1~~9~~3** requires tenants receive documentation on funding opportunities, such as the Carl Moyer Program, which provide incentives for using cleaner-than-required engines and equipment. **MM-AQ-2~~0~~8** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site be model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030, or when commercially available for the intended application, whichever date is later. **MM-AQ-20** further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (1) 33% of the fleet will be zero emission vehicles at start of operations, (2) 65% of the fleet will be zero emission vehicles by December 31, 2026, (3) 80% of the fleet will be zero emission vehicles

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	by December 31, 2028, and (4) 100% of the fleet will be zero emission vehicles by December 31, 2030.~~requires tenants to use alternative fueled trucks and/or apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, or other similar funds.~~ **MM-AQ-~~8~~10** requires all TRU loading docks provide electrical hookups and all loading docks be designed to be compatible with SmartWay trucks. **MM-AQ-11~~15~~** requires installation of main electrical supply lines and panels have been sized to support heavy truck charging facilities when these trucks become available. As detailed in Section 4.7, GHG Emissions, **MM-GHG-1** through **MM-GHG-10** will ensure building efficiencies and compliance with the County Climate Action Plan. See Section 4.2, Air Quality, and Section 4.7, GHG Emissions of this EIR for more discussion.
Goal 5: Maximize the effectiveness of air quality control programs through coordination with other governmental entities.	***Consistent:*** As discussed in Section 4.2, Air Quality, the Project's operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOx, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions. **MM-AQ-~~5~~2** through **MM-AQ-27~~15~~** are designed to reduce Project operational-source VOCs, NOx, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions. However, because the effects of these mitigation measures cannot be meaningfully quantified, impacts would be significant and unavoidable. Therefore, the Project would have the potential to conflict with the AQMP, and the Project would conflict with this goal. However, the proposed Project would provide employment opportunities to western Riverside County, and as detailed in Section 4.12, Population and Housing, the Project would maintain the County's balanced jobs-to-housing ratio. As such, residents could work locally, rather than commute to surrounding areas. Reduced commutes would result in reductions in total vehicle miles traveled, thus reducing air emissions. See Section 4.2, Air Quality, of this EIR for more discussion.
Goal 6: Reduce emissions associated with vehicle/engine use.	***Partially Consistent:*** The Project's operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOx, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions, as detailed in Section 4.2, Air Quality. **MM-AQ-~~5~~2** through **MM-AQ-27~~15~~** are designed to reduce Project operational-source emissions; however, because the effects of these mitigation measures cannot be meaningfully quantified, impacts would be significant and unavoidable. However, the Project would maintain a balanced job/housing ratio for Riverside County. Increasing jobs in the Project site's vicinity would provide an opportunity for residents to work locally, rather than commute to other surrounding areas. A balanced jobs/housing ratio would help reduce vehicle miles traveled, and ultimately help reduce emissions associated with vehicle use. See Section 4.2, Air Quality, of this EIR for more discussion.
Policy 6.1: Reduce idling emissions by increasing traffic flow through synchronized traffic signals.	***Consistent.*** The traffic signals installed by the Project will be synchronized with signals at adjacent intersections.
Policy 6.2: Work with Riverside Transit Authority to develop a local transit system and facilitate connections of the local transit system with regional transit systems.	***Consistent.*** **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Policy 6.3: Encourage diversion of peak hour truck traffic, whenever feasible, to off-peak periods to reduce roadway congestion and associated emissions.	***Consistent.*** **MM-AQ-22** requires tenants provide information to employees and truck drivers on participation in the Voluntary Interindustry 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; and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
Policy 6.4: Work with Caltrans and traffic engineers to ensure that roadways and freeway on-ramps that are heavily utilized by trucks are designed to safely accommodate trucks.	***Consistent***. As detailed in Chapter 5, Transportation, of the proposed Specific Plan, the Project's circulation plan and roadway design will safely accommodate trucks. Additionally, queuing was analyzed at the I-215 on-ramp intersections and found that no significant impact would occur.
Policy 6.5: Encourage trucks operating within March JPA Planning Area to maintain safety equipment and operate at safe speeds so as to reduce the potential for accidents which create congestion and related emissions.	***Consistent.*** See response to Air Quality Element Policy 6.3, above.
Policy 6.6: Reduce vehicle emissions through improved parking design and management that provide for safe pedestrian access to and from various facilities.	***Consistent.*** Section 3.5.4, Off-Street Loading Facilities, of the proposed Specific Plan requires loading or unloading facilities be sized and located so that they do not require trucks to be located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets.
Policy 6.8: Encourage the use of compressed natural gas, clean diesel and/or alternative fuels in engines.	***Consistent.*** **MM-AQ-14** requires the use of electric or battery-operated landscaping equipment. Unless technically infeasible, **MM-AQ-18** requires the use of electric, hydrogen fuel-cell, or compressed natural gas (CNG) powered on-site cargo handling equipment. **MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the project site be model year 2014 or later from start of operations, and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030, or when commercially available for the intended application, whichever date is later. **MM-AQ-20** further requires tenants utilize a "clean fleet" of vehicles/delivery vans/trucks (Class 2 through 6) as part of business operations as follows: For any vehicle (Class 2 through 6) domiciled at the project site, the following "clean fleet" requirements apply: (1) 33% of the fleet will be zero emission vehicles at start of operations, (2) 65% of the fleet will be zero emission vehicles by December 31, 2026, (3) 80% of the fleet will be zero emission vehicles by December 31, 2028, and (4) 100% of the fleet will be zero emission vehicles by December 31, 2030
Goal 7: Reduce emissions associated with energy consumption.	***Consistent:*** Development within the Project would comply with this goal by utilizing energy-efficient equipment and design. Additionally, implementation would include energy conservation features and recycling programs, such as drought-resistant vegetation. **MM-AQ-6** requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent. **MM-AQ-7** requires all buildings to be designed

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	for passive heating and cooling with the inclusion of natural light. MM-GHG-1 requires the installation of a solar photovoltaic system sufficient to generate at least 100% of the building's power requirements, or the maximum permitted by the Riverside County Airport Land Use Commission. ~~Project to install solar generation sufficient to produce 30% of the Project's energy usage and~~ MM-GHG-7 requires each Project site plan to provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code ~~the installation of at least 20 EV chargers~~. As demonstrated in Section 4.5, Energy, all energy-related impacts would be less than significant, and no mitigation is required. See Section 4.5, Energy, for more discussion on energy consumption.
Policy 7.1: Support the use of energy-efficient equipment and design in the March JPA Planning Area for facilities and infrastructure.	***Consistent.*** See response to Air Quality Element Goal 7, above.
Policy 7.2: Encourage incorporation of energy conservation features in development.	***Consistent.*** See response to Air Quality Element Goal 7, above.
Policy 7.3: Support passive solar design in new construction.	***Consistent.*** MM-AQ-6 requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent. MM-AQ-7 requires all buildings to be designed for passive heating and cooling with the inclusion of natural light.
Policy 7.4: Support recycling programs which reduce emissions associated with manufacturing and waste disposal.	***Consistent.*** The Project will comply with all applicable recycling and waste reduction regulatory programs. MM-AQ-22 requires tenants provide information to employees and truck drivers on solid waste reduction and recycling.
Policy 7.5: Support drought-resistant vegetation in landscaping areas to reduce energy needed to pump water.	***Consistent.*** Under the proposed Specific Plan, the landscaping plan serves the dual purpose of providing visual appeal and being sensitive to the environment and climate by using drought-tolerant materials that will be irrigated with reclaimed water that will comply with March JPA's low water use landscape efficiency ordinance.
Goal 8: Reduce air pollution emissions and impacts through siting and building design.	***Consistent:*** Development within the Project would comply with this goal. Implementation would include the use of low-polluting construction materials and coatings along with separation of sensitive receptors from pollutant emissions. MM-AQ-4 requires the use of "Super-Compliant" low VOC paint. MM-AQ-6 requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent. MM-AQ-7 requires all buildings to be designed for passive heating and cooling with the inclusion of natural light. MM-AQ-8 requires all TRU loading docks provide electrical hookups and all loading docks be designed to be compatible with SmartWay trucks. MM-AQ-9 requires industrial buildings larger than 400,000 SF to include a truck operator lounge, to reduce idling emissions. MM-AQ-11 requires installation of main electrical supply lines and panels that have been sized to support "clean fleet" charging facilities when these trucks and delivery vehicles become available. MM-AQ-13 requires electrical outlets or charging stations be provided near landscaped areas. MM-AQ-14 requires tenants utilize electric or battery-operated landscape maintenance equipment. ~~As demonstrated in Section 4.2, Air Quality, construction~~

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	~~related air quality impacts would be less than significant with MM AQ 1 incorporated.~~ The Project would be consistent with the County's Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. See Section 4.2, Air Quality, of this EIR for more discussion.
Policy 8.1: Support the use of low polluting construction materials and coatings.	***Consistent.*** MM-AQ-~~4~~ requires that, prior to issuance of building permits, the developer's construction plans shall ensure the Project will utilize "Super-Compliant" low VOC paints that have been reformulated to reduce VOC emissions so that the regulatory VOC limits put forth by SCAQMD's Rule 1113 are not exceeded. Super-Compliant low VOC paints shall include no more than 10 grams per liter of VOC. Alternatively, the Applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.
Policy 8.3: Encourage the separation of sensitive receptors from potential carbon monoxide hotspots.	***Consistent.*** As detailed in Section 4.2, Air Quality, the Project would not create a carbon monoxide hotspot.
Goal 9: Reduce fugitive dust and particulate matter emissions.	***Partially Consistent:*** The Project would be required to comply with existing regulations governing fugitive dust such as SCAQMD Rule 403, Fugitive Dust, which would help reduce impacts related to the Project. MM-AQ-1 requires the use of CARB Tier 4 Final offroad construction equipment. MM-AQ-2 limits active grading to 20 acres per day. MM-AQ-3 prohibits grading on days with an AQI forecast greater than 150, limits idling of construction equipment to 3 minutes, requires construction heavy-duty hauling trucks to be model year 2014 or later, and prohibits the use of diesel-powered portable generators. The Project operational emissions would exceed regional thresholds of significance established by the SCAQMD for VOC, NOx, CO, ~~and~~ PM_{10}, and $PM_{2.5}$ emissions. The majority of the Project's operational emissions would be derived from the mobile sources. The Project would implement MM-AQ-5~~2~~ through MM-AQ-27~~15~~ to reduce these impacts however, because the effects of these mitigation measures cannot be meaningfully quantified, impacts would be significant and unavoidable. See Section 4.2, Air Quality, of this EIR for more discussion.
Policy 9.1: Require all feasible fugitive dust reduction techniques to be utilized during construction activities.	***Consistent.*** The Project would be required to comply with existing regulations governing fugitive dust such as SCAQMD Rule 403, Fugitive Dust, which would help reduce impacts related to the Project.
Policy 9.3: Support land division design which minimizes grading and maintains the natural topography to the maximum extent feasible.	***Consistent.*** The Project will not import or export soils during grading but will balance materials on site.
Housing Element	
The March JPA General Plan limits residential land uses within the March JPA planning area because housing is incompatible with airfield uses adjacent to the planning area. The proposed Project does not include residential land uses. As such, the proposed Project is consistent with the objectives established in the March JPA General Plan and re-establishes jobs lost from the March AFB realignment. The proposed Project maintains consistency with the General Plan's absence of a residential land use designation within the northwest planning area.	

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Resource Management Element	
Goal 1: Conserve and protect surface water, groundwater, and imported water sources.	***Consistent***. Specific Plan Area development would be required to comply with the Construction General Permit, including implementation of a Storm Water Pollution Prevention Plan, to avoid impacts of stormwater discharges during construction. The Project would be constructed to minimize impacts to existing drainage channels. Impacts to water quality and hydrology would be potentially significant. However, with the incorporation of **MM-HYD-2** (Water Quality Management Plan) and **MM-HYD-3** (Hydrology/Drainage Study) would reduce impacts to a less than significant level. Incorporation of lot-specific, post-construction Low-Impact Development Best Management Practices, as outlined in **MM-HYD-2**, would ensure effective control of incidental releases to the environment of pollutants of concern associated with the Project's proposed land uses, such as sediment, oil and grease, nutrients, heavy metals, and certain pesticides. Similarly, the completion of lot-specific hydrology/drainage reports, as outlined in **MM-HYD-3**, would prevent flooding, and prevent adverse impacts to downstream drainage facilities by incorporating stormwater detention infrastructure, such as detention tanks and basins. For more discussion, see Section 4.9, Hydrology and Water Quality, of this EIR. For discussion on adequate water supplies, see Section 4.17, Utilities and Service Systems, of this EIR.
Policy 1.1: Where possible, retain local drainage courses, channels and creeks in their natural condition.	***Consistent.*** As explained in Section 4.3, Biological Resources, the proposed Project would permanently impact 0.28 acres (5,304 linear feet) of non-wetland waters of the United States under jurisdiction of the USACE; 0.28 acres (5,304 linear feet) of non-wetland waters of the state under jurisdiction of the RWQCB; and 1.68 acres (5,304 linear feet) of vegetated streambed and 0.63 acres of riparian habitat under jurisdiction of the CDFW. **MM-BIO-9** requires compensatory mitigation and that applicable resource agency permits are received prior to Project implementation, requires that equipment and spoil sites are not placed within or adjacent to aquatic resources, and requires that pollutants be contained to prevent contamination of soils and/or waterways. Furthermore, **MM-BIO-1** ensures that work limits are clearly marked, trash and debris are disposed of properly, removed vegetation will be kept out of waterways to limit the spread of non-native species, and construction materials and equipment will be kept away from aquatic resources. Additionally, the Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species.
Policy 1.2: Protect groundwater and surface water resources from depletion and sources of pollution.	***Consistent.*** See response to Resource Management Element Goal 1, above.
Policy 1.3: Cooperate with federal, state, and County governments and other agencies on the maintenance and improvement of the quality and quantity of local and regional groundwater resources.	***Consistent.*** See response to Resource Management Element Goal 1, above.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Policy 1.4: Require development to conserve water resources, including the use of water-efficient plumbing fixtures and irrigation systems.	***Consistent.*** **MM-GHG-8** requires water efficient toilets. **MM-GHG-9** requires waterless urinals. **MM-GHG-10** requires water efficient faucets. Additionally, the Project will use reclaimed water and will comply with March JPA's low water use landscape efficiency ordinance.
Policy 1.5: Conserve imported water by requiring water conservation techniques, water-conserving and recycling processes, drought-resistant landscaping, and reclaimed water for irrigation, when available and appropriate.	***Consistent.*** Under the proposed Specific Plan, the landscaping plan serves the dual purpose of providing visual appeal while also being sensitive to the environment and climate by using drought-tolerant materials that will comply with March JPA's low water use landscape efficiency ordinance. The Project includes the construction of a 0.5-million-gallon reclaimed water tank. Figure 3-7C of this EIR, details the Project's reclaimed water system, which would provide reclaimed water to the Campus Development for irrigation purposes so as to reduce the dependence and reliance upon potable water for landscaping and irrigation.
Policy 1.6: Promote the use of drought tolerant landscaping in development, and encourage the use of reclaimed water for irrigation, when available and appropriate.	***Consistent.*** See response to Resource Management Element Policy 1.5, above.
Policy 1.7: Assist responsible public agencies in eliminating the discharge of toxic materials and untreated sewage into the March JPA drainage and groundwater system.	***Consistent.*** See response to Resource Management Element Goal 1, above.
Policy 1.8: Assure that development projects comply with regulatory agency requirements, including federal, state and regional regulations.	***Consistent.*** The Project will comply with all applicable regulatory programs.
Goal 2: Control flooding to reduce major losses of life and property.	***Consistent***. Buildout of the Specific Plan would result in increased impervious surfaces within the Specific Plan Area as well as include future improvements that properly capture, control, and maintain stormwater as required by existing regulations. Impacts to water quality and hydrology are determined to be potentially significant. **MM-HYD-3** would require the preparation of a Hydrology/Drainage Study prior to issuance of a grading permit for individual development projects. Incorporation of this mitigation measure would reduce impacts to a less than significant level. See discussion within Section 4.9, Hydrology and Water Quality, of this EIR for potential impacts related to flooding.
Policy 2.1: Require development within identified flood hazard areas to comply with Floodplain Management Regulations and criteria for the Federal Flood Insurance Program.	***Consistent.*** As explained in Section 4.9, Hydrology and Water Quality, the Project site is not within a flood plain and the potential for flooding is considered very low. Additionally, the Project site is not located within a Dam Hazard Zone per the County of Riverside Safety Element Figure 5. The Project would not impede or redirect flood flows. Impacts would be less than significant, and no additional mitigation is required.
Policy 2.2: Ensure all proposed divisions of land divisions contain adequate building sites located	***Consistent.*** See response to Resource Management Element Goal 2, above.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
outside of any natural drainage course.	
Policy 2.3: Ensure that development does not divert storm water runoff onto adjacent properties, or cause alterations of natural drainage courses that cannot be adequately handled by flood control improvements coincident with the development.	***Consistent.*** As discussed in Section 4.9, Hydrology and Water Quality, **MM-HYD-3** requires lot-specific hydrology/drainage reports that include measured pre-development flows and demonstration that stormwater runoff flow rate associated with specific lot development would be less than or equal to existing stormwater runoff conditions, to prevent excessive on- and off-site runoff and associated erosive scour.
Policy 2.4: Cooperate with the Riverside County Flood Control and Water Conservation District and the Federal Emergency Management Agency (FEMA) to ensure that land uses and development proposed within major floodplain areas is consistent with planned improvements and the timing of their installation.	***Consistent.*** See response to Resource Management Element Goal 2, above.
Policy 2.5: To the greatest extent possible, require development to use master flood control facilities and limit use of interim drainage facilities or open channels.	***Consistent.*** As shown in Figure 3-7D, Storm Drain System, of this EIR, the Project will connect and use master flood control facilities.
Policy 2.6: Open channels shall be encouraged, as appropriate, to maintain or enhance riparian habitat areas.	***Consistent.*** The Project does not include open channels due to the Project site's proximity to the March ARB/Inland Port Airport.
Goal 3: Conserve and protect significant land forms, important watershed areas, mineral resources and soil conditions.	***Consistent.*** Impacts related to geology and soils are potentially significant. However, incorporation of **MM-GEO-1**, which requires compliance with the Project Geotechnical Report to ensure slope stability and erosion control during construction, would reduce impacts to a less than significant level. In addition, as discussed in Section 4.9, Hydrology and Water Quality, implementation of soil stabilization measures, as outlined in **MM-HYD-1**, would ensure effective control of potential soil erosion following grading and prior to construction on individual lots, such that impacts to surface water quality from the Project would be less than significant after mitigation incorporated. For discussion related to landforms and soil conditions, see Section 4.6, Geology and Soils. For discussion on important watershed areas, see Section 4.9, Hydrology and Water Quality, of this EIR. Finally, no impacts to mineral resources are anticipated to occur, as further discussed in Appendix A, Initial Study, of this EIR.
Policy 3.1: Conserve hillsides and rock outcroppings in the planning area through the use of master-planned developments which create a "campus-like" setting, and encourage the creative siting of	***Consistent.*** Figure 1-4, Land Use Plan, of the March JPA General Plan designates the former Weapons Storage Area as Park/Recreation/Open Space and the remainder of the Project site as Business Park. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
building areas as a means of retaining natural areas and open space.	in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of this EIR. Under the current General Plan land use designations, 85% of the Project site would be slated for development; under the Project, only 45% of the Project site is proposed for development.
Policy 3.2: Encourage the use of contour grading methods when grading of hillsides.	***Consistent.*** Section 6.8, Grading, of the proposed Specific Plan requires a conceptual grading design for each Tentative Map application consistent with the March JPA Development Code, and grading designs will implement the goals and policies of the March JPA General Plan. Figure 6-9, Conceptual Grading Exhibit, of the Specific Plan shows the proposed grading for each individual parcel in the West Campus Upper Plateau Specific Plan Area. Among other requirements, the Grading Plan Development Standards in the proposed Specific Plan require the overall shape, height, and gradient of any cut and fill slope to be designed to be consistent with the existing natural contours and scale of the natural terrain to the extent feasible. As set forth in Section 4.6, Geology and Soils, of this EIR, the Project would incorporate **MM-GEO-1**, which requires all grading to be performed in accordance with the grading guidelines outlined in the March JPA Development Code and the proposed Specific Plan, among other measures.
Policy 3.3: Conserve mineral resources, if any are identified by the State Mining and Geology Board, by limiting or phasing development in the areas of the most desirable mineral extraction sites.	***Consistent***. The Project site does not include mineral resources.
Policy 3.4: Reclaimed land impacted by mining shall be in accordance with the State Surface Mining and Reclamation Act.	***Consistent***. The Project site has not been impacted by mining.
Policy 3.5: Require and practice proper soil management techniques to reduce erosion, sedimentation and other soil-related problems.	***Consistent.*** **MM-GEO-1** requires compliance with the Project Geotechnical Report to ensure slope stability and erosion control during construction. As discussed in Section 4.9, Hydrology and Water Quality, implementation of soil stabilization measures, as outlined in **MM-HYD-1**, would ensure effective control of potential soil erosion following grading and prior to construction on individual lots, such that impacts to surface water quality from the Project would be less than significant after mitigation is incorporated.
Policy 3.6: Control erosion during and following construction through proper grading techniques, vegetation replanting, and the installation of proper drainage control improvements.	***Consistent.*** See response to Resource Management Element Policy 3.5, above.
Policy 3.7: Require erosion control measures such as binders, revegetation, slope covers, and other practices which reduce soil erosion due to wind and water.	***Consistent.*** **MM-GEO-1** requires compliance with the Project Geotechnical Report to ensure slope stability and erosion control during construction. Additionally, the Project would comply with SCAQMD Rule 403, Fugitive Dust.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Policy 3.8: Protect important mineral resources, prominent and geological features by maintaining their locations in open space or through a protected status.	***Consistent***. The Project site does not include mineral resources. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species.
Goal 4: Conserve energy resources through use of available energy technology and conservation practices.	***Consistent.*** As appropriate, the proposed Project would comply with applicable regulations relating to energy conservation. As detailed in Section 4.7, GHG Emissions, **MM-GHG-1** through **MM-GHG-10** will conserve energy resources by ensuring building efficiencies and compliance with the County Climate Action Plan. Specifically, **MM-GHG-1** requires installation of a solar photovoltaic system sufficient to generate at least 100% of the building's power requirements or the maximum permitted by the Riverside County Airport Land Use Commission. ~~the Project to install solar generation sufficient to produce 30% of the Project's energy usage and~~ **MM-GHG-7** requires each Project site plan to provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code ~~the installation of at least 20 EV chargers~~. **MM-AQ-6** requires all buildings to achieve the 2023 LEED Silver certification standards or equivalent. **MM-AQ-7** requires all buildings to be designed for passive heating and cooling with the inclusion of natural light. As demonstrated in Section 4.5, Energy, all energy-related impacts would be less than significant, and no additional mitigation is required. See Section 4.5, Energy, of this EIR for more discussion.
Goal 5: Conserve and protect significant stands of mature trees, native vegetation, and habitat within the planning area.	***Consistent.*** The Project includes the establishment of a 445.43-acre Conservation Easement in compliance with the CBD Settlement Agreement (Appendix S). Implementation of the Specific Plan Area could significantly impact mature trees, native vegetation, and habitat within the planning area. As demonstrated in Section 4.3, Biological Resources, impacts to biological resources were determined to either result in no impact, less than significant, or less than significant with **MM-BIO-1** through **MM-BIO-9** incorporated. See Section 4.3, Biological Resources, of this EIR for more discussion.
Policy 5.1: Where practical, conserve important plant communities and habitats such as riparian areas, wetlands, significant tree stands, and species by using buffers, creative site planning, revegetation and open space easements/dedications.	***Consistent.*** The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods.
Policy 5.2: Encourage the planting of native species of trees and other drought-tolerant vegetation.	***Consistent.*** Under the proposed Specific Plan, only native and non-invasive landscaping is allowed in areas adjacent to the Conservation Easement. Appendix C, Landscape Plant Palette, to the Specific Plan provides a list of plant materials approved for use in the Specific Plan Area. Many of the plant materials are water-efficient species native to the region or naturalized to the arid Southern California climate. Additionally, the Landscape Plant Palette will comply with the Multiple

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	Species Habitat Plan and will not include any listed invasive species. Under the proposed Specific Plan, the landscaping plan serves the dual purpose of providing visual appeal and being sensitive to the environment and climate by using drought-tolerant materials that will comply with March JPA's low water use landscape efficiency ordinance.
Policy 5.4: In areas that may contain important plant and animal communities, require development to prepare biological assessments identifying species types and locations and develop measures to preserve recognized sensitive species, as appropriate.	***Consistent.*** See response to Resource Management Element Goal 5, above.
Policy 5.5: Where practical, allow development to remove only the minimum natural vegetation and encourage the revegetation of graded areas with native plant species.	***Consistent.*** See response to Resource Management Element Policy 5.2, above.
Policy 5.6: Work with state, federal and local agencies in the preservation and/or mitigation of recognized sensitive vegetation and wildlife in March JPA Planning Area.	***Consistent.*** See response to Resource Management Element Goal 5, above.
Goal 6: Provide an effective and efficient waste management system for solid and hazardous wastes that is financially and environmentally responsible.	***Consistent.*** The proposed Project would comply with appropriate and applicable regulations and standards with respect to the management of solid and hazardous wastes, as discussed in Section 4.8, Hazards and Hazardous Materials. Impacts related to hazardous materials are potentially significant. However, incorporation of **MM-HAZ-1** through **MM-HAZ-3** would reduce impacts to a less than significant level. See Section 4.8, Hazards and Hazardous Materials, of this EIR for more discussion.
Goal 7: Promote cultural awareness through preservation of the planning area's historic, archaeological, and paleontological resources.	***Partially Consistent.*** Development within the Project would result in potentially significant impacts to historic, archaeological, and paleontological resources. As detailed further in Section 4.4, Cultural Resources, even with the application of **MM-CUL-1** through **MM-CUL-9**, the Project would result in significant and unavoidable impacts to historical and archaeological resources. Impacts to paleontological resources would be potentially significant. However, incorporation of **MM-GEO-2**, which requires monitoring for paleontological resources, as well as salvage if necessary, would reduce impacts to a less than significant level. For more discussion, see Section 4.4, Cultural Resources, and Section 4.6, Geology and Soils, of this EIR.
Policy 7.5: Require development proposals that are located on or near archaeological or paleontological resources to provide a cultural resources study that assesses potential impacts to the resource as a result of the proposed development.	***Consistent.*** See response to Resource Management Element Goal 7, above.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
The report will include measures to avoid destruction of any significant cultural resources.	
Policy 7.6: Require the preservation of identified cultural resources to the extent possible, prior to development, through dedication, removal, transfer, reuse, or other means.	***Consistent.*** See response to Resource Management Element Goal 7, above.
Goal 8: Develop and maintain recreational facilities as economically feasible, and to meet the needs of the community for recreational activities, relaxation, and social interaction.	***Consistent.*** The proposed Project includes a 60.28-acre park west of the Barton Street extension under the Specific Plan buildout scenario. The Project would result in less than significant impacts relative to recreation; as such, no mitigation measures are required. See Section 4.14, Recreation, of this EIR for more discussion.
Policy 8.1: Provide active and passive park and recreational facilities, based on reasonable service areas within the planning area, to serve the unmet needs of the community and sub-region.	***Consistent.*** The Project includes an approximately 60-acre Park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. The Project also includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use.
Policy 8.2: Encourage involvement of private investment in the development of recreational facilities, when appropriate, to increase the recreational opportunities of the area.	***Consistent.*** See response to Resource Management Element Policy 8.1, above.
Policy 8.3: Seek out and pursue all forms of federal, state, local, private foundation and endowment support to assist in the development and programming of park and recreation resources in March JPA Planning Area.	***Consistent.*** See response to Resource Management Element Policy 8.1, above.
Policy 8.4: Coordinate with the other recreational programs and agencies in providing regional recreational facilities in the area.	***Consistent.*** See response to Resource Management Element Policy 8.1, above.
Goal 9: Create a network of open space areas and linkages throughout the planning area that serves to preserve natural resources, protect health and safety, contributes to the character of the community, provide active and passive recreational use, as well as visual and physical relief from urban development.	***Consistent***. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Thus, the Project designates more land for non-development uses. The Project includes the establishment of a 445.43-acre Conservation Easement in compliance with the CBD Settlement Agreement (Appendix S), which would provide a buffer of at least 300 feet of open space on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. The currently existing service roads within the Conservation Easement, as depicted by the red lines on Figure 3-4, would continue to be utilized by the public for passive recreation as authorized by the March JPA. The Project also includes a 60.28-acre Park west of the Barton Street

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	extension. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users, which further buffers the existing residential uses to the west of the site.
Policy 9.1: Encourage a "link" system of open space land to intermix with development providing both visual buffers and relief, as well as preservation and connectivity of the natural environment.	***Consistent.*** The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. In sum, this will preserve and enhance the open space values of the Conservation Easement in perpetuity. The Project includes another 17.72 acres of open space surrounding the Campus Development to provide further buffer for the Conservation Easement and surrounding neighborhoods.
Policy 9.2: Seek funding sources for the preservation and maintenance of open space areas in the March JPA Planning Area.	***Consistent.*** See response to Resource Management Element Policy 9.1, above.
Policy 9.3: Allow recreational uses on designated open space lands.	***Consistent.*** The Project includes 17.72 acres of open space along with the establishment of a 445.43-acre Conservation Easement that will remain open land with existing trails for passive recreational use.
Policy 9.4: Manage passive recreational open spaces to optimize use while avoiding environmental disruption.	***Consistent.*** See response to Resource Management Element Policy 9.1, above.
Policy 9.5: Link open space areas and trails with adjacent regional and local open space and trails networks.	***Consistent.*** See response to Resource Management Element Policy 9.1, above.
Policy 9.6: Establish an open space conservation program that identifies areas of open space retention based upon capital costs, operation and maintenance costs, accessibility, needs, resource preservation, ability to complete or enhance the existing open space linkage system and natural environment.	***Consistent.*** See response to Resource Management Element Policy 9.1, above.
Policy 9.7: As appropriate, designate washes, channels, utility corridors and transportation rights-of-way as major linkages of the open space network.	***Consistent.*** See response to Resource Management Element Policy 9.1, above. Additionally, the Project will include two wildlife crossings under Cactus Avenue and one wildlife crossing under Brown Street.
Policy 9.8: Enforce the standards of the military and FAA relative to aviation hazard areas to protect the use of the aviation field, and use of property within its vicinity.	***Consistent.*** Both the Specific Plan Area and Conservation Easement will be managed to avoid creating wildlife hazards for March ARB.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
Goal 10: Establish standards for scenic corridors, trails and vistas that contribute to the quality of the planning area.	***Consistent.*** This Project would result in changes to the visual character of the Project site. As demonstrated in Section 4.1, Aesthetics, the Project would result in less than significant impacts related to scenic vistas and visual character. No mitigation is required. See Section 4.1, Aesthetics, of this EIR for more discussion.
Safety/Risk Management Element	
Goal 1: Minimize injury and loss of life, property damage, and other impacts caused by seismic shaking, fault rupture, ground failure, and landslides.	***Consistent***. All development within the Project would be designed and constructed in accordance with applicable standards of the California Building Code and, through incorporation of **MM-GEO-1,** consistent with recommendations contained in the Project Geotechnical Report. Impacts related to seismic shaking and associated geologic concerns would be less than significant mitigation incorporated. See Section 4.6, Geology and Soils, for more discussion.
Policy 1.1: Require geological and geotechnical investigations in areas of potential seismic or geologic hazards as part of the environmental and development review process. Require mitigation of seismic or geologic hazards to the satisfaction of the responsible agencies.	***Consistent.*** See response to Safety/Risk Management Element Goal 1, above.
Policy 1.2: Ensure all grading plans comply with the Uniform Building Code and California Building Code including, if necessary, requiring preliminary investigations of development sites by a State-registered geotechnical engineers and certified engineering geologists.	***Consistent.*** See response to Safety/Risk Management Element Goal 1, above.
Policy 1.3: If necessary, require liquefaction assessment studies in any area identified as having moderate to high liquefaction susceptibility.	***Consistent.*** As explained in Section 4.6, Geology and Soils, due to the general lack of shallow groundwater and relatively dense nature of the underlying materials, liquefaction, lateral spreading, and dynamic settlement are not considered potential geologic hazards.
Policy 1.4: Support earthquake strengthening and provisions for alternative or back-up essential services, such as water, sewer, electricity, and natural gas pipelines and connections, especially in areas of high seismic or geologic hazards.	***Consistent.*** See response to Safety/Risk Management Element Goal 1, above.
Goal 2: Minimize grading and otherwise changing the natural topography, while protecting the public safety and property from geologic hazards.	***Consistent.*** Project construction would include all rough grading, including removal of ~~14~~12 of the existing bunkers and infrastructure throughout the entire Specific Plan Area. Grading throughout the buildout of the Specific Plan Area would incorporate specific development standards and mitigation measures to reduce impacts to aesthetics and cultural resources. See Section 4.1, Aesthetics, and 4.4, Cultural Resources, for more discussion. All development within the Project would be designed and constructed in accordance with

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
	applicable standards of the California Building Code and, through incorporation of **MM-GEO-1,** consistent with recommendations contained in the Project Geotechnical Report. See also Section 4.6, Geology and Soils, for more discussion on grading recommendations and potential public safety/geologic hazards during construction activities.
Policy 2.1: Discourage any grading beyond that which is necessary to create adequate building pads area.	***Consistent.*** Section 6.8, Grading, of the proposed Specific Plan requires a conceptual grading design for each Tentative Map application consistent with the March JPA Development Code, and grading designs will implement the goals and policies of the March JPA General Plan. Figure 6-9, Conceptual Grading Exhibit, of the Specific Plan shows the proposed grading for each individual parcel in the West Campus Upper Plateau Specific Plan Area. Among other requirements, the Grading Plan Development Standards in the proposed Specific Plan require the overall shape, height, and gradient of any cut and fill slope to be designed to be consistent with the existing natural contours and scale of the natural terrain to the extent feasible. As set forth in Section 4.6, Geology and Soils, of this EIR, the Project would incorporate **MM-GEO-1**, which requires all grading to be performed in accordance with the grading guidelines outlined in the March JPA Development Code and the proposed Specific Plan, among other measures.
Policy 2.2: Discourage excessive grading of slopes greater than 3:1 (three horizontal to one vertical), but where allowed, encourage varied slope ratios on design slopes to reduce the visual impact of grading.	***Consistent.*** See response to Safety/Risk Management Element Policy 2.1, above.
Goal 3: Minimize injury, loss of life, property damage, and economic and social disruption caused by flood hazards.	***Consistent***. The proposed Project would provide a number of drainage facilities to ensure flood hazards associated with the Specific Plan Area are managed in accordance with applicable regulations. Impacts to water quality and hydrology are determined to be potentially significant. As such, **MM-HYD-2** would incorporate a Water Quality Management Plan during operational activities. Additionally, **MM-HYD-3** would require the preparation of a Hydrology/Drainage Study prior to issuance of a grading permit for individual development projects. Incorporation of these mitigation measures would reduce impacts to a less than significant level. See Section 4.9, Hydrology and Water Quality, of this EIR for discussion on the Project site's potential risk associated with flood hazards.
Goal 4: Reduce threats to public safety and protect property from wildland and urban fire hazards.	***Consistent.*** The Project site is not located within a Very High Fire Hazard Severity Zone identified by the California Department of Forestry and Fire Protection (see Section 4.18, Wildfire, of this EIR for more discussion). All potentially significant wildfire impacts would be reduced to less than significant levels with implementation of **PDF-FIRE-1** through **PDF-FIRE-4** and mitigation measures **MM-FIRE-1** and **MM-HYD-3**. As such, buildout of the Specific Plan would not result in people and structures at risk of wildland and urban fire hazards. Additionally, the Project would comply with all applicable regulations and guidelines relating to brush management and fire protection

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	services. The Project will also construct the Meridian Fire Station, which would maintain acceptable service ratios, response times, and other performance objectives.
Policy 4.1: Ensure that law enforcement and fire services, such as fire equipment and response time, are adequate and able to respond to a major disaster.	***Consistent.*** As discussed in Section 4.13, Public Services, the Project will not impede police or fire services or response times. Further, the Project will construct the Meridian Fire Station, which will improve regional fire services.
Policy 4.4: Support the mutual aid agreement with March ARB Fire Department.	***Consistent.*** The Project will not impede the March ARB mutual aid agreement. Further, the Project will construct the Meridian Fire Station.
Goal 5: Reduce the potential for hazardous material exposure or contamination in the planning area.	***Consistent.*** The proposed Project would comply with regulations and guidelines relating to hazardous material exposure/contamination, including the March JPA Development Code, California Occupational Safety and Health Administration, as detailed in Section 4.8, Hazards and Hazardous Materials, of this EIR. Impacts related to hazardous materials are potentially significant. However, incorporation of **MM-HAZ-1** through **MM-HAZ-3** would reduce impacts to a less than significant level.
Policy 5.1: Comply with the enforcement of disclosure laws that require all users, producers, and transporters of hazardous materials and wastes to clearly identify such materials at the site, and to notify the appropriate County, State and/or Federal agencies in the event of a violation.	***Consistent.*** As discussed in Section 4.8, Hazards and Hazardous Materials, on-site storage of all hazardous materials, including fuels, would be required to adhere to facility-specific hazardous materials business plans.
Policy 5.3: Require land uses involved in the production, storage, transportation, handling, or disposal of hazardous materials are located a safe distance from land uses that may be adversely impacted by such activities.	***Consistent.*** The Project is designed to funnel business traffic east towards I-215. **MM-HAZ-2** prohibits facilities located within 0.25 miles of an existing school, including public or private schools and preschools, from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code Section 25532.
Goal 6: Ensure to the fullest extent practical that, in the event of a major disaster critical structures and facilities remain safe and functional.	***Consistent.*** The proposed Project would comply with regulations and guidelines related to the functionality of critical structures in the event of a major disaster. It was determined within the Initial Study (Appendix A) that the Project would result in a less than significant impact related to impairing the implementation of, or physically interfering with, an adopted emergency response plan or emergency evacuation plan.
Goal 7: Reduce the possible risk of upset, injury and loss of life, property damage, and other impacts associated with an aviation facility.	***Consistent.*** Development within the Project would be consistent with the Riverside County ALUCP. See discussion within this Section under Riverside County Airport Land Use Compatibility Plan for consistency analysis with the ALUCP as well as Appendix L. As further discussed below, the FAA determined the proposed structures do not exceed obstruction standards and would not be a hazard to air navigation. No substantial adverse effect on the safe and efficient utilization of

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	navigable airspace by aircraft or on the operation of air navigation facilities.
Policy 7.2: Ensure development and use of property within the vicinity of the airfield complies with appropriate building standards and codes, including height restrictions, restrictions on use, setbacks, population densities, insulation and materials, as contained within an approved Comprehensive Land use Plan and appropriate AICUZ.	***Consistent.*** See response to Safety/Risk Management Element Goal 7, above.
Goal 8: Plan for emergency response and recovery from natural and urban disasters.	***Consistent.*** The proposed Project would not physically interfere with emergency routes. Implementation of the Specific Plan would be consistent with the March Area Emergency Resource Guide. It was determined within the Initial Study (Appendix A) that the Project would result in a less-than-significant impact related to impairing the implementation of, or physically interfering with, an adopted emergency response plan or emergency evacuation plan.
Policy 8.1: Update emergency plans, contacts, and liaisons with regional, State and Federal emergency response organizations at least every five years.	***Consistent.*** See response to Safety/Risk Management Element Goal 8, above.
Policy 8.2: Establish an emergency response organization consisting of representatives from County agencies (Public Social Services, Sheriff, Fire), and local representatives from March JPA, and utilities.	***Consistent.*** See response to Safety/Risk Management Element Goal 8, above.
Policy 8.5: Establish traffic control contingency plans for disaster routes.	***Consistent.*** See response to Safety/Risk Management Element Goal 8, above.
Policy 8.6: Coordinate with County Sheriff and Fire agencies to identify casualty collection points and sheriff/fire staging areas.	***Consistent.*** See response to Safety/Risk Management Element Goal 8, above.
Draft Environmental Justice Element[1]	
Health Risk Reduction	
Pollution Exposure Policies	
HC 16.5*: Evaluate the compatibility of unhealthy and polluting land uses being located near sensitive receptors including possible impacts on ingress, egress, and access routes. Similarly, encourage sensitive receptors, such as housing, schools, hospitals, clinics, and childcare facilities to be located away from	***Consistent.*** The EIR prepared for the Project includes an evaluation of all polluting land uses located near sensitive receptors, including, but not limited to, existing residences, schools (including preschools), and recreational uses. Section 4.2, Air Quality, includes an evaluation of potential construction and operational air quality impacts to surrounding land uses, including sensitive receptors, and also includes the results of a Health Risk Assessment prepared for the Project. **MM-AQ-1** through

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uses that pose potential hazards to human health and safety.	MM-AQ-27 are included to reduce identified air quality impacts. As detailed in the Project Health Risk Assessment (Appendix C-2), all impacts from diesel particulate matter would fall below established health standards. Section 4.8, Hazards and Hazardous Materials, evaluates potential hazards impacts to surrounding land uses related to the storage and handling of potential hazardous materials associated with industrial uses. Additionally, within Section 4.8 is an analysis of potential impacts to the existing preschool located at Grove Community Church. MM-HAZ-2 prohibits facilities located within 0.25 miles of an existing school from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code 25532. Section 4.11, Noise, includes an analysis of potential construction and operational noise impacts to surrounding sensitive uses. The Project would have less than significant impacts due to construction noise and no mitigation is required. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. Additionally, in each of these sections, the analysis in the EIR discusses the future Park, which will be a publicly available recreational amenity. Further, as shown in Table 3-2, Development Standards, of the proposed Specific Plan, Business Park and Mixed Use buildings greater than 100,000 SF are required to be set back a minimum of 800 feet from residential and buildings 100,000 SF or less are required to be set back a minimum of 300 feet from residential. Industrial buildings greater than 200,000 SF must be set back a minimum of 1,000 feet from residential. In addition, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 4.4.2, Truck Courts and Loading Docks, of the proposed Specific Plan requires truck courts and loading docks to be oriented away or screened to reduce visibility from public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses. The Conservation Easement will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area.
HC 16.6*: When developing and siting large scale logistics, warehouse and distribution projects, address the Good Neighbor Policy for Logistics and Warehouse/Distribution uses criteria adopted by the Board of Supervisors on November 19, 2019	***Consistent.*** Development within the Project site would comply with this goal. The Project would be consistent with the County's Good Neighbor Policy for Logistics and Warehouse/Distribution Uses. See Table 4.10-2, below, for the detailed consistency discussion.

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and as may be subsequently amended.	
HC 16.10*: Plan for compact development projects in appropriate locations, including in existing communities and the clustering of affordable and mixed income housing therein, that make the most efficient use of land and concentrate complementary uses in close proximity to transit or non-transit mobility options and advocate for expanded transit and non-transit mobility options to serve such areas.	***Consistent.*** The March JPA General Plan limits residential land uses within the March JPA planning area because housing is incompatible with airfield uses adjacent to the planning area. The proposed Project does not include residential land uses. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of this EIR. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. The Project site would be served by both local transit service and inter-city passenger rail service. The local transit system of bus stops and bus shelters would be approved by the Riverside Transit Agency. The closest bus stop is located on Alessandro Boulevard to the north of the Project site. **MM-GHG-11** provides funding for a bus shelter on Alessandro Boulevard. The Metrolink passenger rail transit facility is located approximately 1.5 miles from the Campus Development. The 6-foot bike lanes on all Project roadways and 6-foot sidewalks within the Project site would enhance connectivity to the existing Metrolink Station.
HC 16.14*: Assure that sensitive receptors are separated and protected from polluting point sources, as feasible, including agricultural businesses that produce or use pesticides and chemical fertilizers.	***Consistent***. The EIR evaluates impacts of potential Project uses to sensitive receptors, including, but not limited to, within Section 4.2, Air Quality, and Section 4.8, Hazards and Hazardous Materials. The Project includes **MM-AQ-1** through **MM-AQ-27** to reduce air emissions and **MM-HAZ-1** through **MM-HAZ-3** to reduce hazards impacts to the maximum extent feasible. See also response to Policy 16.13, above.
HC 16.15*: Assure that site plan design protects people and land, particularly sensitive land uses such as housing and schools, from air pollution and other externalities associated with industrial and warehouse development through the use of barriers, distance, or similar solutions or measures from emission sources when possible.	***Consistent***. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of this EIR. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Further, as shown in Table 3-2, Development Standards, of the proposed Specific Plan, Business Park and Mixed Use buildings greater than 100,000 SF are required to be set back a minimum of 800 feet from residential and buildings 100,000 SF or less are required to be set back a minimum of 300 feet from residential. Industrial buildings greater than 200,000 SF must be set back a

Table 4.10-1. Project Consistency with March JPA General Plan Goals

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	minimum of 1,000 feet from residential. In addition, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 4.4.2, Truck Courts and Loading Docks, of the proposed Specific Plan requires truck courts and loading docks to be oriented away or screened to reduce visibility from public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses. The Project includes **MM-AQ-1** through **MM-AQ-27** to reduce air emissions to the maximum extent feasible.
HC 16.16*: Apply pollution control measures such as landscaping, vegetation, and green zones (in cooperation with the SCAQMD) and other materials, which trap particulate matter or control air pollution.	***Consistent***. The Conservation Easement provides a minimum 300-foot buffer between surrounding development and the proposed Specific Plan Area (with a larger buffer to the south and east). In addition to Conservation Easement, there is an additional 120-foot landscaped buffer interface on the north side of the Specific Plan Area (see Figure 4-17 of the proposed Specific Plan). The Conservation Easement would remain as permanent open space. Additionally, as required by the Specific Plan, roadways would include trees and landscaping along sidewalks. Additionally, the Project includes **MM-AQ-1** through **MM-AQ-27** to reduce air emissions to the maximum extent feasible.
HC 16.18*: Promote new development that emphasizes job creation and reduction in vehicle miles traveled in job-poor areas and does not otherwise contribute to onsite emissions in order to improve air quality.	***Consistent.*** Buildout of the Specific Plan would provide new job opportunities to residents in the region and maintain the jobs/housing balance. The proposed Project would reduce commutes to surrounding areas and reduce VMT associated with longer commutes. Although the Specific Plan Area is not anticipated to have a significant VMT impact, **MM-AQ-21** would further reduce VMT by requiring all tenants to implement or otherwise participate in a Transportation Demand Management program, including on-site transit pass sales and discounted passes; shuttle service to/from public transit and commercial/food establishments, if warranted; a guaranteed ride home; and "commuter club" to manage subsidies or incentives for employees who carpool, vanpool, bicycle, walk, or take transit to work. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard.
HC 16.22*: Discourage industrial uses which use large quantities of water in manufacturing or cooling processes that result in subsequent effluent discharges and encourage agricultural businesses to limit and reduce the production and use of pesticides and chemical fertilizers to the maximum extent possible thereby minimizing contaminated infiltration and runoff, including runoff to the Salton Sea and other standing bodies of water.	***Consistent***. The proposed Project would provide the necessary facilities to support the existing wastewater collection, treatment, and disposal system. As described in Chapter 3, the Project includes infrastructure improvements such as the installation of utility and roadway networks throughout the Specific Plan Area and the construction of a new sewer lift station. Project impacts to utilities and service systems would be less than significant, and no mitigation is required. See Section 4.17, Utilities and Service Systems, of this EIR for more discussion on the Project's impact to existing sewer infrastructure and WMWD's treatment capacity. The Project does not propose any agricultural land use that would involve the production or significant use of pesticides and chemical fertilizers. As detailed in Section 4.8, Hazards and Hazardous Materials, the Project site has been thoroughly evaluated and analyzed

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	for potential health hazards and contamination. With the implementation of MM-HAZ-1, MM-HAZ-2, MM-HAZ-3, and MM-FIRE-1, all hazards and hazardous materials impacts associated with the proposed Project would be less than significant.
HC 16.23*: Discourage industrial and agricultural uses which produce significant quantities of toxic emissions into the air, soil, and groundwater to prevent the contamination of these physical environments.	*Consistent*. The Project does not propose any agricultural uses that would produce significant quantities of toxic emissions. With regard to industrial uses, MM-AQ-1 through MM-AQ-27 are included to reduce identified air quality impacts. MM-HAZ-2 prohibits facilities located within 0.25 miles of an existing school from storing, handling, or using toxic or highly toxic gases at quantities that exceed threshold levels established by California Health and Safety Code 25532. Incorporation of lot-specific, post-construction low-impact development best management practices, as outlined in MM-HYD-2, would ensure effective control of incidental releases to the environment of pollutants of concern associated with the Project's proposed land uses, such as sediment, oil and grease, nutrients, heavy metals, and certain pesticides. Furthermore, the Health Risk Assessment, included as Appendix C-2 and summarized in Section 4.2, Air Quality, prepared for the Project did not identify any significant health risk impacts associated with Project construction or operation.
HC 16.24*: Ensure compatibility between industrial development and agricultural uses and adjacent land uses. To achieve compatibility, industrial development and agricultural uses will be required to include criteria addressing noise, land, traffic and greenhouse gas emissions to avoid or minimize creating adverse conditions for adjacent communities.	*Consistent.* Section 4.11, Noise, includes an analysis of potential construction and operational noise impacts to surrounding sensitive uses. The Project would have less than significant impacts due to construction noise, and no mitigation is required. With regard to on-site operational noise, the Draft EIR determined the Project would have less than significant noise impacts to all noise-sensitive receiver locations. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of this EIR. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. Further, as shown in Table 3-2, Development Standards, of the proposed Specific Plan, Business Park and Mixed Use buildings greater than 100,000 SF are required to be set back a minimum of 800 feet from residential and buildings 100,000 SF or less are required to be set back a minimum of 300 feet from residential. Industrial buildings greater than 200,000 SF must be set back a minimum of 1,000 feet from residential. In addition, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 4.4.2, Truck Courts and Loading Docks, of the proposed Specific Plan

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	requires truck courts and loading docks to be oriented away or screened to reduce visibility from public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes towards I-215. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. As detailed in Section 4.7, Greenhouse Gas Emissions, the Project would be consistent with the County's Climate Action Plan.
HC 16.25*: Require the conversion of mining operations into uses that are compatible with surrounding areas in accordance with the Surface Mining and Reclamation Act.	***Not Applicable***. No mining activities are occurring on the Project site currently, and the Project would not introduce new mining activities.
Food Access Policies	
HC 17.2*: Orient buildings closer to streets or provide landscaped promenades that connect buildings to bus stops with routes that provide access to shopping centers, grocery stores, and areas where farmers markets are held.	***Consistent***. Buildings would be required to be constructed in a manner consistent with the proposed Specific Plan and to be accessible via landscaped walkways from parking areas and adjacent roadways. Additionally, **MM-GHG-11** requires the Project to provide funding for the installation of a bus shelter on Alessandro Boulevard. See Section 4.15, Transportation, of the EIR for more discussion.
HC 17.3*: Encourage site design for new development to accommodate interior spaces for recreational and other neighborhood uses, such as community gardens and farmer's markets in order to increase access to fresh and healthy foods; and to render such spaces convenient and available to neighboring streets, neighborhoods, and other nearby facilities to fill the void or lack of small grocery stores and increase access to fresh and healthy foods within EJ Communities.	***Consistent***. The proposed Project includes a 60.28-acre Park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground; multi-use sports fields that could be used for soccer, football, and field hockey; and trails with cardio stops for recreational users. The currently existing service roads within the Conservation Easement would continue to be utilized by the public for passive recreation as authorized by March JPA.
HC 17.5*: Encourage the development of diverse food establishments prioritizing mom and pop healthy food establishments and community kitchens for homemade foods to be sold in areas with a high concentration of fast food establishments, convenience stores and liquor stores.	***Applicable to March JPA***. The western portion of the Specific Plan Area would be zoned for Mixed Use. Included within this Mixed Use could be food establishments. While no food establishment plans are known at the time, the zoning and land use designation would allow for these uses and would not preclude the development of diverse food establishments.

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HC 17.6*: Work with local farmers and growers to develop a program to provide affordable access to fruits and vegetables grown in the area to the EJ communities. Identify and establish the location of grocery stores, healthy corner stores, farmers markets all which carry a complement of healthy foods to be located in close proximity to transit nodes and other active transportation system links.	***Applicable to March JPA***. This policy is specific to the larger March JPA jurisdiction and not to individual projects. The Project would not impede the provision of affordable access to fruits and vegetables.
HC 17.7*: Promote edible landscaping and community gardens for suitable public and private land as well as for residential and mixed use projects.	***Applicable to March JPA***. This policy is specific to the larger March JPA jurisdiction and not applicable to Industrial/Business Park developments. Due to concerns identified by the U.S. Air Force Reserve regarding bird/wildlife aircraft strike hazards, the proposed development site, which underlies the airport Primary Departure/Approach Zone, is especially ill-suited for edible vegetation that could otherwise attract prey for raptors. However, the Project would include the development of a Park to be designed through a future feasibility study, and, if supported by the Air Force Reserve, edible landscaping could be incorporated.
Safe and Sanitary Home Policies	
HC 18.7*: Discourage industrial, agricultural and other land uses that may pollute and cause health conflicts with residential land uses either directly or indirectly. Ensure that community members are properly notified and involved in the decision-making process for new land use proposals.	***Consistent.*** See responses to draft Environmental Justice Element Policies HC 16.5, 16.23 and 16.24, above. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, two Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 2,000 feet around the perimeter of the project site, resulting in 2,172 public notices.
HC 18.8*: Work with the development community including small property and mobile home park owners so new residential development, particularly for low income households, is designed to limit their exposure to high noise levels, pesticide and fertilizer exposure, dust pollution, and other potential impacts associated with adjacent industrial and agricultural uses.	***Not Applicable***. The Project does not include any residential components.
HC 18.9*: Encourage the location and design of new developments to visually enhance and not degrade the character of the surrounding area through consideration of the following concepts.	***Consistent***. As discussed in Section 4.1, Aesthetics, the Project would result in less than significant impacts related to scenic vistas and visual character with implementation of PDF-AES-1 through PDF-AES-16 and **MM-AES-1**.

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a. Using design standards of the appropriate Specific Plan land use category.	a. The Project would be developed in accordance with the development standards and design guidelines of the proposed Specific Plan.
b. Construction of structures in accordance with the requirements of March JPA's zoning, building, and other pertinent codes and regulations.	b. Implementation of the Specific Plan would include compliance with proposed design guidelines and development standards and procedures necessary to develop the Specific Plan Area consistent with the March JPA Development Code.
c. Require that an appropriate landscape plan be submitted and implemented for development projects subject to discretionary review.	c. The proposed Specific Plan requires submittal of a landscape plan consistent with Section 4.5, Landscape Design Guidelines, of the Specific Plan.
d. Use of drought tolerant landscaping that incorporates adequate drought-conscious irrigation systems.	d. Under the proposed Specific Plan, the landscaping plan serves the dual purpose of providing visual appeal and being sensitive to the environment and climate by using drought-tolerant materials that will comply with March JPA's low water use landscape efficiency ordinance.
e. Application of energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy.	e. Development within the Project would utilize energy-efficient equipment and design. Additionally, implementation would include energy conservation features and onsite solar generation. Regarding shading, Section 4.5.5, Landscape Design Guidelines, of the Specific Plan and March JPA Development Code Section 9.17.040(D) require 40 feet on center tree spacing, a minimum size of 24-inch box for trees in public rights-of-way, and on-site landscape trees to be a minimum of 60% 24-inch box trees and 40% 15-gallon trees. Finally, on-site trees shall be a minimum of 80% evergreen and no more than 20% deciduous.
f. Application of water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate.	f. The landscape design guidelines in the proposed Specific Plan require the use of drought-tolerant materials. The Project includes the construction of a 0.5-million-gallon reclaimed water tank. Figure 3-7C of this EIR, details the Project's reclaimed water system, which would provide reclaimed water to the Campus Development for irrigation purposes so as to reduce the dependence and reliance upon potable water for landscaping and irrigation.
g. Encourage innovative and creative design concepts.	g. The proposed Specific Plan allows for flexibility in design within defined parameters.
h. Encourage the provision of public art that enhances the community's identity, which may include elements of historical significance and creative use of children's art.	h. The two retained weapons storage bunkers will be within open space and accessible to the public. A plaque describing the Weapons Storage Area will also be erected adjacent to the retained bunkers.
i. Include consistent and well-designed signage that is integrated with the building's architectural character.	i. The signage requirements of the Project are subject to the Specific Plan and March JPA signage regulations.
j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses.	j. Pursuant to Section 3.5.3, Driveway Widths and Locations, of the proposed Specific Plan, driveway spacing shall either be in conformance with the Riverside County Road Standards and Specifications (Ord. 461, as amended) or as approved by the March JPA Civil Engineer.
k. Locate site entries and storage bays to minimize conflicts with	k. As shown in Table 3-2, Development Standards, of the proposed Specific Plan, industrial-use buildings of any size will require a

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adjacent residential neighborhoods. l. Mitigate noise, odor, lighting, pollution exposure and other impacts on surrounding properties. m. Provide and maintain landscaping in open spaces and parking lots. n. As feasible, maximize landscape coverage with emphasis on drought-tolerant landscaping. o. Preserve, as feasible, natural features, such as unique natural terrain, arroyos, canyons, and other drainage ways, and native vegetation, wherever possible, particularly where they provide continuity with more extensive regional systems. p. Require, as feasible, that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements. q. Design parking lots and structures to be functionally and visually integrated and connected. r. As feasible, site building access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity where such pass-through areas include wayfinding signage, street trees, grade and lateral separation from roads, all with consideration given to adequate safety lighting, and landscape screening. s. Encourage safe and frequent pedestrian crossings and ensure that sidewalks and other pedestrian walkways provide continuity between land uses	1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 4.4.2, Truck Courts and Loading Docks, of the proposed Specific Plan requires truck courts and loading docks to be oriented away or screened to reduce visibility from public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses. All site entrances will be located on internal streets. l. See responses to draft Environmental Justice Element Policies HC 16.23 and 16.24, above. m. The proposed Specific Plan requires landscaping in buffer areas and parking lots. Maintenance of buffer areas would be handled through a Community Facilities District/Lighting, Landscape and Maintenance District. Maintenance of parking lot landscape would be by the lot owner or their contractor. n. The landscape design guidelines in the proposed Specific Plan require the use of drought-tolerant materials. In addition to parkway landscaping within the public right-of-way and buffer tracts, on-site landscaping is required on 10% of the lot area for Industrial and Business Park development and 20% of site area for Mixed Use development. o. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. The Project includes an approximately 60-acre Park with active and passive recreational uses and access points for existing trails in the Conservation Easement for passive recreational use. p. Figure 5-1, Circulation Plan, of the proposed Specific Plan details the roadway network within the Project site. All Project roadways will include dual 6-foot bike lanes. Figure 5-3, Non-Motorized Circulation Plan, of the Specific Plan identifies the bike lanes and sidewalks within the Specific Plan Area. It also shows the trails within the Conservation Easement, new recreational trail connections, and the 10-foot-wide multi-use trail along the Barton Street extension. q. The proposed Specific Plan provides design guidelines and standards to ensure parking lots and structures are functionally and visually integrated and connected. r. The proposed Specific Plan includes guidelines for site design, including landscaping, driveways, parking lots, and connections to sidewalks and bicycle lanes. s. The proposed Specific Plan includes guidelines for streetscape design, including landscaping, sidewalks, and bicycle lanes.

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
essential to a functional lifestyle, and as needed such sidewalks and pedestrian walkways should provide sufficient lighting and signage to ensure public safety. t. Encourage creation of a human-scale ground floor environment that includes public open areas that separate pedestrian space from auto traffic or where mixed, it does so with special regard to pedestrian safety. u. Recognize open space, including hillsides, arroyos, riparian areas, and other natural features as amenities that add community identity, beauty, recreational opportunities, and monetary value to adjacent developed areas. v. Manage wild land fire hazards in the design of development proposals located adjacent to natural open space.	t. The proposed Specific Plan includes guidelines for streetscape design, which address location of sidewalks and pedestrian safety. u. The Project will place 445.43 acres of the Project site under a conservation easement to be managed for its wildlife habitat value for sensitive species. As part of the Conservation Easement, the developer will contribute $2 million toward a non-wasting endowment to be used for management and monitoring activities by the third-party land management entity. Under the current General Plan land use designations, business park development would be immediately adjacent to the surrounding residential uses, with open space in the center as shown in Figure 3-2, March JPA General Plan Existing and Proposed Land Use Designations, of this EIR. The proposed Project will provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. Under the current General Plan land use designations, 85% of the Project site is designated for development; under the Project, only 45% of the Project site is proposed for development, including 78 acres for the proposed Park and additional buffering open space. v. All potentially significant wildfire impacts would be reduced to less than significant levels with implementation of PDF-FIRE-1 through PDF-FIRE-4 and **MM-FIRE-1** and **MM-HYD-3**.
HC 18.12*: Prioritize the development of safe and affordable housing in EJ Communities while at the same time minimizing the displacement of existing residents consistent with the March JPA Housing Element, the County Housing Element, Goal 2, Action 2.1h and as may be amended by the 6th Cycle Housing Element. Affordable housing projects should include various housing types that respond to community priorities and input.	***Not Applicable***. The Project does not involve the construction of new housing or the displacement of any existing housing. March JPA's purpose is job generation through development, and March JPA does not have a Regional Housing Needs Assessment housing target.
Physical Activity Policies	
HC 19.2*: Develop high-quality parks, green space, hiking trails, recreational facilities and natural environments in areas where such facilities are lacking.	***Consistent***. The proposed Project includes a 60.28-acre Park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground; multi-use sports fields that could be used for soccer, football, and field hockey; and trails with cardio stops for recreational users. The currently existing service roads within the Conservation Easement would continue to be utilized by the public for passive recreation as authorized by the March JPA.
HC 19.6*: Plan for a system of local trails that enhances recreational	***Consistent***. The proposed Project includes a 60.28-acre Park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground; multi-use

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
opportunities and connects with regional trails.	sports fields that could be used for soccer, football, and field hockey; and trails with cardio stops for recreational users. The currently existing service roads within the Conservation Easement would continue to be utilized by the public for passive recreation as authorized by the March JPA. Additionally, all Project roadways would include dual 6-foot bike lanes. Figure 5-3, Non-Motorized Circulation Plan, in the Specific Plan, identifies the bike lanes and sidewalks within the Specific Plan Area. It also shows the trails within the Conservation Easement, new recreational trail connections, and the 10-foot-wide multi-use trail along the Barton Street extension.
HC 19.7*: Incorporate open space, community greenbelt separators, and recreational amenities into development areas in order to enhance recreational opportunities and community aesthetics to improve the quality of life.	***Consistent***. See response to draft Environmental Justice Element Policy HC 19.5, above.
Public Facilities	
HC 20.1*: New development should provide for public services including but not limited to solar street lighting, shading structures at bus stops, other supporting infrastructure, and extension of trash and recyclables pickup routes.	***Consistent***. The Project would incorporate the use of solar. **MM-GHG-1** requires installation of a solar photovoltaic system sufficient to generate at least 100% of the building's power requirements or the maximum permitted by the Riverside County Airport Land Use Commission and **MM-GHG-7** requires each Project site plan to provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code. The local transit system of bus stops and bus shelters would be approved by the Riverside Transit Agency. The closest bus stop is located on Alessandro Boulevard to the north of the Project site. **MM-GHG-11** provides funding for a bus shelter on Alessandro Boulevard. Additionally, the Project would include the extension of trash and recyclables pickup routes for service providers.
HC 20.2*: New development should promote convenient internal pedestrian circulation among land uses (existing and proposed) within each neighborhood and connecting with existing adjacent developed areas, and as applicable consistent with the Southern California Association of Governments Regional Transportation Plan/Sustainable Communities Strategy, and amendments thereto.	***Consistent***. All Project roadways would include dual 6-foot bike lanes. Figure 5-3, Non-Motorized Circulation Plan, in the Specific Plan, identifies the bike lanes and sidewalks within the Specific Plan Area. It also shows the trails within the Conservation Easement, new recreational trail connections, and the 10-foot-wide multi-use trail along the Barton Street extension.
HC 20.4*: New development and conservation land uses should not infringe upon existing essential public facilities and public utility corridors, which include county regional	***Consistent***. SoCal Gas does have a natural gas line that traverses beneath the Project site, and as part of the Project this line would be modified and buried beneath the Project site at a different elevation. The existing EMWD water tank will not be impacted by the Project. The

Table 4.10-1. Project Consistency with March JPA General Plan Goals

Goal/Policy	Consistency Analysis
landfills, fee owned rights-of-way and permanent easements, whose true land use is that of public facilities.	Project site does not have any additional essential public facilities on the site.

Sources: March JPA 1999a,2023; Meridian 2023.

1 The March JPA Draft Environmental Justice Element was modeled after the County of Riverside's policies. Similar to the County of Riverside, March JPA Environmental Justice policies with an asterisk next to them (*) are those that apply to development projects. As such, the consistency analysis focuses on those policies.

As shown in Table 4.10-1, the Project would be generally partially consistent with some of the goals and policies identified in the March JPA General Plan and the Draft Environmental Justice Element. Several of the policies in the draft Environmental Justice Element apply broadly to the entire March JPA Planning Area or apply to scenarios not found in the March JPA Planning Area (i.e., mobile home parks). However, wWhere appropriate, mitigation measures are included to reduce and/or avoid potential conflicts with applicable goals adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to consistency with the March JPA General Plan would be **less than significant with mitigation incorporated**.

March JPA Development Code

As mentioned previously, and as shown in Figure 3-3, the Project site is located within a portion of the March JPA Planning Area property that has not yet been zoned. Implementation of the Project would require the approval of zoning designations, which would be consistent with the proposed Specific Plan.

Specific Plan Area (Campus Development, Park, and Infrastructure Improvements)

The proposed Project includes a Specific Plan (SP-9) consistent with applicable requirements in California Government Code Sections 65450–65457 and March JPA Development Code Chapter 9.13 containing development standards, design guidelines, infrastructure master plans, maintenance responsibilities, phasing schedule, and implementation procedures necessary to develop the Specific Plan Area consistent with the requested General Plan Amendment designations. The proposed Specific Plan addresses land uses, zoning, and design guidelines. When a specific plan is adopted in accordance with the procedure outlined above, the specific plan may effectively supersede portions or all of the current zoning regulations for specified parcels or plan area and becomes an independent set of zoning regulations that provide specific direction to the type and intensity of uses permitted and may define other types of design and permitting criteria. As such, the proposed Specific Plan would be adopted by ordinance and serve as the primary zoning document for the Project site. Where the Specific Plan is silent, the relevant sections and requirements of the March JPA Development Code would apply.

Under the Specific Plan buildout scenario analyzed in this Draft EIR, the Campus Development would be developed with ten Business Park parcels, six Mixed Use parcels, three Industrial parcels, two Public Facility parcels, and three open space parcels. These parcels would be created, designated, and graded. Buildings B and C would be constructed on two of the Industrial Parcels. The remaining parcels would be developed with square footages as allowed under the Specific Plan. The Specific Plan Area also includes 60.28-acre Park west of the Barton Street extension. The recreational amenities analyzed include a playground, multiuse sports fields that could be used for soccer, football, and field hockey, and trails with cardio stops for recreational users. Infrastructure improvements include installation of utility and roadway networks connecting to and throughout the Specific Plan Area, the

construction of a new sewer lift station, the construction of a new electrical substation, and the construction of a new 0.5 million gallon ~~(MG)~~ reclaimed water tank.

Adoption of the proposed Specific Plan would help facilitate consistency with the March JPA Development Code. In addition, the Project requests the approval of a tentative parcel map, two plot plans, ~~an amendment to the disposition and development agreement,~~ a development agreement, and other discretionary entitlements that are required by the March JPA Development Code for implementation. Therefore, upon approval of the proposed Project, the Specific Plan would be consistent with the March JPA Development Code for the purposes of avoiding or mitigating environmental effects. As such, impacts would be **less than significant**.

Conservation Easement

The Conservation Easement would provide a buffer of at least 300 feet of open space on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. No new development would occur within this area, and the Conservation Easement would be established in compliance with the CBD Settlement Agreement (Appendix S). The Project would designate this area as Open Space – Conservation. Moreover, as no physical alteration to the Conservation Easement is anticipated, there would be **no impact** with respect to consistency with the March JPA Development Code.

Riverside County Airport Land Use Compatibility Plan

The Project site is located within Zones B1, B2, C1, and C2 of the ALUCP (see Figure 4.10-2, ALUC Compatibility Map), which encompasses areas of moderate to high noise factors and moderate to high risk level for safety and airspace protection factors (Mead & Hunt 2014). Zone B1 allows for 100 people per one acre and a maximum of 50% lot coverage within APZs. Zone B2 allows for 250 people per one acre, and an average land use intensity of 100 people per acre. Zone C1 allows single-acre land use intensities of up to 500 people, and an average land use intensity of 100 people per acre. Zone C2 allows for an average of 200 people per acre or 500 people for one acre.

Specific Plan Area (Campus Development, Park, and Infrastructure Improvements)

As detailed above in Section 4.10.2, Riverside County ALUC prohibits certain land uses within Zones C1 and C2 of the ALUCP, including, but not limited to: children's schools, day care centers, libraries; hospitals, congregate care facilities, places of assembly; noise-sensitive outdoor nonresidential uses; and hazards to flight. These regulations are established to ensure safety due to proximity with the airport. As outlined in Chapter 3 of this EIR and Table 3-1 of the Specific Plan, none of the prohibited land uses are proposed within the Campus Development.

The Campus Development encompasses 291.6 acres, with an additional 17.72 acres of open space. The Campus Development is within Zones C1 and C2 of the ALUCP. The Campus Development would result in approximately 2,600 employees during operation. This would average approximately 9 people per acre[1] within the Campus Development. As such, the proposed Project would introduce a persons-per-acre ratio well below the allowed land use intensities in all ALUCP zones overlapping with the Project site (see Figure 4.10-2). Additionally, the Project would incorporate **PDF-HAZ-1**, to ensure compliance with ALUC's conditions (see Section 4.8, Hazards and Hazardous Materials, for more details).

[1] 2600 employees divided by 291.60 acres = 8.92 (9 people)

The 60-acre Park is located in ALUCP Zone C2 and, based on the analyzed amenities, is unlikely to exceed an average of 200 people per acre or 500 people for one acre. The Infrastructure Improvements are not anticipated to have full-time employees and will comply with the ALUCP's person/acre ratio.

As detailed above, the Specific Plan identifies industrial, business park, and mixed-use land uses within the Campus Development. The Specific Plan also includes development standards limiting structures to a maximum building height of 4550 feet for Business Park and, Mixed Use parcels and 50 feet for Industrial parcels (buildings within 800 feet of residential uses are limited to a maximum height of 45 feet; for more discussion, see Section 4.1, Aesthetics, of this EIR). As such, the Project would not include uses such as children's schools, or highly noise-sensitive outdoor nonresidential uses, and would not include buildings greater than 70 feet tall or other structures that would be a hazard to flight. Moreover, the Project has been determined consistent with the ALUCP by the Riverside County Airport Land Use Commission, subject to conditions which have been included as **PDF-HAZ-1** (see Section 4.8, Hazards and Hazardous Materials, of this EIR for more details). Any changes to the Project would be subject to future review and consideration at the discretion of the ALUC director, per the conditions outlined in the Project's consistency determination (Appendix L).

Additionally, the Specific Plan demonstrates compliance with building height regulations within the vicinity of a runway, in compliance with Federal Aviation Regulations (FAR) Part 77. FAR Part 77 provides guidelines for proposed construction by issuing a determination of hazard to air navigation. Implementation of the Specific Plan would be required to comply with these regulations and determinations in order to be consistent with the ALUCP. Figure 4.10-2, ALUC Compatibility Map, illustrates the Project site's location within each zone and Section 4.10.2, above, outlines specified height conditions required for review. On May 16, 2022, the Riverside County Airport Land Use Commission determined the proposed Project would be consistent with the ALUCP and subjected future development to conditions to help achieve consistency and reduce potential impacts (Appendix L). In addition, the FAA issued a determination of no hazard to air navigation on April 29, 2022, based on aeronautical studies prepared by FAA under the provisions of 49 U.S.C., Section 44718 (FAA 2022a–h). The studies determined the proposed structures do not exceed obstruction standards and would not be a hazard to air navigation. No substantial adverse effect on the safe and efficient utilization of navigable airspace by aircraft or on the operation of air navigation facilities.

Given the above, the Riverside County Airport Land Use Commission has determined the Specific Plan would be consistent with the ALUCP. Therefore, the Specific Plan would not conflict with the Riverside County ALUCP, and impacts would be **less than significant**. No mitigation is required.

Conservation Easement

As shown in Figure 3-4, the Conservation Easement surrounds the proposed Specific Plan Area and includes a majority of the eastern portion of the Project site. Figure 4.10-2 illustrates the eastern portion of the Conservation Easement is located within land use compatibility zones with more restrictions and limitations (i.e., Zones B1 and B2). As no physical alteration to the Conservation Easement is proposed, there would be **no impact** with respect to consistency with the ALUCP.

Good Neighbor Policy for Logistics and Warehouse/Distribution Uses for the County of Riverside

Specific Plan Area and Conservation Easement

For purposes of evaluating the consistency of the Project with the Good Neighbor Policy for Logistics and Warehouse/Distribution Uses for the County of Riverside, the entirety of the Project (the Specific Plan Area and the establishment of the Conservation Easement) are evaluated together. A consistency analysis is provided within Table 4.10-2 to demonstrate compatibility of both the Project's proposed Specific Plan Area and Conservation Easement with each policy of the Good Neighbor Policy for the County of Riverside.

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
Studies/Analysis	
1.1 An "Air Quality" study shall be prepared in accordance with the Air Quality Management District (AQMD) guidelines which includes both project specific and cumulative impact analysis.	***Consistent.*** An Air Quality Impact Analysis has been prepared in accordance with SCAQMD standards. See Appendix C-1 of the EIR.
1.2 A "Health Risk Assessment" shall be prepared when a proposed warehouse/distribution facility is located within 1,000 feet of a sensitive receptor, in accordance with AQMD guidelines.	***Consistent.*** A Health Risk Assessment has been prepared in accordance with SCAQMD standards. See Appendix C-2 of the EIR.
1.3 A "Noise Impact Analysis" shall be prepared for use during the land use entitlement review process to evaluate potential impacts to the neighboring properties. The analysis shall include construction and operations-related noise impacts, including stationary and off-site increases to ambient noise levels.	***Consistent.*** A Noise Impact Analysis has been prepared in accordance with March JPA, County of Riverside, and City of Riverside standards. See Appendix M of the EIR.
1.4 A "Construction Traffic Control Plan" shall be prepared prior to grading, which details the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations. This is in addition to a Traffic Impact Study as may be required for the environmental review process.	***Consistent.*** **MM-TRA-1** (Construction Traffic Management Plan) requires implementation of a March JPA-approved Construction Traffic Management Plan addressing potential construction-related traffic detours and disruptions to ensure that to the extent practical, construction traffic would access the Project site during off-peak hours. The plan also includes measures to maintain existing access for land uses in proximity of the Project site throughout construction; schedule deliveries and pick-ups of construction materials to non-peak travel periods; minimize obstruction of through traffic lanes on Alessandro Boulevard and Meridian Parkway; identify designated transport routes for heavy trucks; and establish requirements for loading/unloading and storage of materials on the Project Site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, and sidewalk closings or pedestrian diversions, among others.

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
Construction Phase	
2.1 During construction of the warehouse/distribution facility, all heavy duty haul trucks accessing the site shall have CARB-Compliant 2010 engines or newer approved CARB engine standards.	***Consistent***. MM-AQ-3 requires the construction contractor to use heavy-duty hauling trucks that are model year 2014 or later.
2.2 All diesel fueled off-road construction equipment greater than 50 horsepower, including but not limited to excavators, graders, rubber-tired dozers, and similar "off-road" construction equipment shall be equipped with CARB Tier 4 Compliant engines. If the operator lacks Tier 4 equipment, and it is not available for lease or short-term rental within 50 miles of the project site, Tier 3 or cleaner off-road construction equipment may be utilized subject to County approval.	***Consistent***. MM-AQ-1 requires offroad equipment used during construction to meet CARB Tier 4 Final emission standards or better.
2.3 The maximum daily disturbance area (actively graded area) shall not exceed 10 acres per day. Non-Grading construction activity in areas greater than 10 acres is allowed.	***Partially Consistent***. As discussed in Section 4.2, Air Quality, with implementation of MM-AQ-1 through MM-AQ-4, the Project's air quality impacts during construction would be less than significant. MM-AQ-2 limits amount of daily grading as follows: during Phase 1, areas of active ground disturbance shall not exceed a maximum of 20 acres per day for mass grading and 20 acres per day for blasting and rock handling. During Phase 2, the area of active ground disturbance shall not exceed a maximum of 20 acres per day for remedial grading. The construction contractor shall submit a grading log to the March JPA every 2 weeks documenting acreage graded or equivalent cubic yardage to ensure compliance.
2.4 Construction contractors shall utilize construction equipment, with properly operating and maintained mufflers, consistent with manufacturers' standards.	***Consistent***. MM-AQ-3 requires all construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records on site and available to regulatory authorities upon request.
2.5 Construction contractors shall locate or park all stationary construction equipment so that the emitted noise is directed away from sensitive receptors nearest the project site, to the extent practicable.	***Consistent***. As discussed in Section 4.11, Noise, the Project will have less than significant noise impacts during construction. The Project includes construction measures that will further reduce construction noise impacts. MM-AES-1 (Construction Equipment Staging and Screening) requires all large construction equipment and vehicles, including large trucks, cranes, and bulldozers, to be staged outside of and/or screened from the public viewshed when not in use. MM-AQ-3 limits idling of construction equipment to 3 minutes.
2.6 The surrounding streets shall be swept on a regular basis to remove any construction related debris and dirt.	***Consistent***. Project will comply with SCAQMD Rule 403, Fugitive Dust, which requires all track-out from an active operation be removed at the conclusion of each workday or evening shift.

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
2.7 Appropriate dust control measures that meet the SCAQMD standards shall be implemented for grading and construction activity.	***Consistent***. Construction, including grading activities, within the West Campus Upper Plateau Specific Plan Area is subject to SCAQMD Rule 403, Fugitive Dust, and will implement the best available dust control measures as listed in Table 1 of Rule 403.
2.8 Construction equipment maintenance records and data sheets, which includes equipment design specifications and equipment emission control tier classifications, as well as any other records necessary to verify compliance with items 2.1-2.7 above, shall be kept onsite and furnished to the County upon request.	***Consistent***. **MM-AQ-3** requires all construction equipment to be tuned and maintained in accordance with the manufacturer's specifications, with maintenance records on site and available to regulatory authorities upon request. **MM-AQ-2** prohibits the operating hours of construction equipment to exceed 8 hours and requires the construction contractor to submit a biweekly log to March JPA to ensure compliance.
2.9 Construction Contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.	***Consistent***. **MM-AQ-3** prohibits construction equipment idling longer than 3 minutes.
2.10 During construction, the Transportation & Land Management Agency representative shall conduct an on-site inspection with a facility representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts.	***Consistent***. In addition to the biweekly construction equipment hours log and grading log required by **MM-AQ-2**, March JPA's general practice is to conduct regular on-site inspections during construction.
Siting and Design	
3.1 Warehouse/distribution facilities should be generally designed so that truck bays and loading docks are a minimum of 300 feet, measured from the property line of the sensitive receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design include berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design.	***Consistent***. Table 3-2 Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 SF to be set back a minimum of 800 feet from residential and buildings 100,000 SF or less to be set back a minimum of 300 feet from residential. Industrial buildings greater than 200,000 SF must be set back a minimum of 1,000 feet from residential. In addition, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan requires truck courts and loading docks to be oriented away or screened to reduce visibility from public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses.
3.2 Warehouse/distribution facilities shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be	***Consistent***. Table 3-3, Minimum Passenger Vehicle Parking Space Requirements, of the Specific Plan sets forth the parking spaces per SF required for Specific Plan uses. Section 3.5.4, Off-Street Loading Facilities, of the Specific Plan requires loading or unloading facilities to be sized and located so that they do not require trucks to be

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas.	located in required front or street side yards during loading and unloading activities, ensuring trucks do not spill onto surrounding public streets.
3.3 Truck driveways shall generally be placed, on streets that do not have fronting sensitive receptors.	***Consistent***. Figure 5-1, Circulation Plan, of the Specific Plan provides an internal roadway network that provides direct access for vehicles and trucks that do not face or front sensitive receptors surrounding the project site.
3.4 Sites shall clearly mark entry and exit points for trucks and service vehicles.	***Consistent***. MM-AQ-12 requires an on-site signage program that clearly identifies the required on-site circulation system through posted signs and painting on driveways and internal roadways.
3.5 Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced no further apart than 25 feet on center. Fifty percent of the landscape screening shall include a minimum of 36- inch box trees. Facility operators will be responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan.	***Consistent***. The Conservation Easement provides a minimum 300-foot buffer between surrounding development and the proposed Specific Plan Area (with a larger buffer to the south and east). In addition to Conservation Easement, there is an additional 120-foot landscaped buffer interface on the north side of the Specific Plan Area (see Figure 4-17 of the proposed Specific Plan). As required by the Specific Plan, roadways would include trees and landscaping along sidewalks. Section 4.5.5, Landscape Design Guidelines, of the Specific Plan and March JPA Development Code Section 9.17.040(D) require 40 feet on center tree spacing, a minimum size of 24-inch box for trees in public ROW, and on-site landscape trees to be a minimum of 60% 24-inch box trees and 40% 15-gallon trees. Finally, on-site trees shall be a minimum of 80% evergreen and no more than 20% deciduous. Table 7-1 of the proposed Specific Plan outlines the maintenance responsibilities for the common area landscaping, which will be managed through either a Landscape and Lighting Maintenance District or a Community Facilities District.
3.6 On-site speed bumps shall not be allowed except at security/entry gates. Truck loading bays and drive aisles shall be designed to minimize truck noise.	***Consistent***. Section 3.5.6 Off-Street Parking, of the Specific Plan prohibits on-site speed bumps unless required at the discretion of the Planning Director due to pedestrian safety concerns.
3.7 Dock doors shall be located where they are not readily visible from sensitive receptors or major roads. If it is necessary to site dock doors where they may be visible, a method to screen the dock doors shall be implemented. A combination of landscaping, berms, walls, and similar features shall be considered.	***Consistent***. Pursuant to Table 3-2, Development Standards, of the Specific Plan, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility from public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses.

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
3.8 An additional "wing-wall" shall be installed perpendicular to the loading dock areas to further attenuate noise related to truck activities and also address aesthetics by screening the loading area when adjacent to sensitive receptors.	***Consistent***. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require that loading doors, service docks, and equipment areas be oriented or screened to reduce visibility from public roads, publicly accessible locations, and surrounding residential areas. Table 3-2, Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 SF to be set back a minimum of 800 feet from residential and buildings 100,000 SF or less to be set back a minimum of 300 feet from residential. Industrial buildings greater than 200,000 SF must be set back a minimum of 1,000 feet from residential. In addition, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks.
3.10 All lighting used in conjunction with a warehouse/distribution facility operations, shall be directed down into the interior of the site and not spill over onto adjacent properties.	***Consistent***. Section 4.4.6, Outdoor Lighting, of the Specific Plan requires all exterior lighting to minimize glare and "spill over" light onto public streets, adjacent properties, and Conservation Easement by using downward-directed lights and/or cutoff devices on outdoor lighting fixtures; limit light spillover or trespass to one-quarter foot-candle or less, measured from within 5 feet of any adjacent property line for development adjacent to the Conservation Easement; and limit light spillover or trespass to one-half foot-candle or less, measured from within 5 feet of any adjacent property line for development adjacent to other development sites.
3.11 Warehouse/distribution facilities shall install electrical panels and conduit to facilitate future electrical connections, to eliminate idling of main and auxiliary engines during the loading and unloading process. At all cold storage facilities electrical connections shall be provided to each dock.	***Consistent***. Section 4.4.2 of the Specific Plan requires loading bays that are utilized by refrigerated trailers to have dock seals and be equipped with plug-in electrical outlets. In addition, **MM-AQ-8** requires that all TRU loading docks provide electrical hookups and all loading docks are designed to be compatible with SmartWay trucks. **MM-AQ-11** requires electrical supply lines and panels to be sized to support "clean-fleet" charging facilities, including heavy-duty and delivery trucks.
3.12 Facility construction shall comply with the hours of operation and exterior noise decibel levels as required by Riverside County Ordinance No. 847 ("Noise Ordinance")	***Consistent***. The Project's Noise Impact Analysis determined the Project's construction noise would not exceed March JPA, County of Riverside, or City of Riverside standards. See Appendix M of the EIR. During construction, the Project will be subject to the adopted March JPA noise and construction hours standards.
Operations	
4.1 Facility operators shall maintain records of their facility owned and operated fleet equipment and ensure that all diesel-fueled Medium-Heavy Duty Trucks ("MHDT") and Heavy-Heavy Duty ("HHD") trucks with a gross vehicle weight rating	***Consistent***. **MM-AQ-20** requires all heavy-duty trucks (Class 7 and 8) domiciled at the Project site be model year 2014 or later from start of operations and shall expedite a transition to zero-emission vehicles, with the fleet fully zero-emission by December 31, 2030, or when

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
greater than 19,500 pounds accessing the site use year CARB compliant 2010 or newer engines. The records should be maintained on-site and be made available for inspection by the County.	commercially available for the intended application, whichever date is later. **MM-AQ-25** requires the facility operator to maintain records on site demonstrating air quality regulation compliance and making records available for inspection by the local jurisdiction, air district, and state upon request.
4.2 Facility operators shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.	***Consistent***. **MM-AQ-17** limits truck idling to 3 minutes once the vehicle is stopped, the transmission is set to neutral or park, and the parking brake is engaged and requires truck drivers to shut off engines when not in use.
4.3 Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	***Consistent***. **MM-AQ-22** requires the facility operator to provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
4.4 Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.	***Consistent***. **MM-AQ-22** requires the facility operator to provide information to all tenants, with instructions that the information shall be provided to employees and truck drivers as appropriate, regarding health effects of diesel particulates, state regulations limiting truck idling time, the benefits of minimized idling, and the importance of minimizing traffic, noise, and air pollutant impacts to any residences in the Project vicinity. **MM-AQ-25** requires the facility operator to monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable.
4.5 On-site equipment, such as forklifts, shall be electric with the necessary electrical charging stations provided.	**Consistent**. **MM-AQ-14** requires use of electric or battery-operated equipment for landscape maintenance. **MM-AQ-18** requires the use of only electric service yard trucks (hostlers), pallet jacks and forklifts, and other on-site equipment, with necessary electrical charging stations provided. As an alternative, hydrogen fuel-cell or compressed natural gas powered equipment shall also be acceptable. Tier 4 Final diesel yard hostlers would only be allowed if electric hostlers are technically infeasible.
4.6 Facility operators shall establish specific truck routes between the facility and regular destinations, identifying the most direct routes to the nearest highway/freeway and avoid traveling near sensitive receptors.	***Consistent***. The Project is designed to funnel trucks away from neighborhoods and onto approved truck routes. Only the Park and open space amenities will be accessible off of Barton Street; the parcels within the Campus Development can only be accessed via Cactus Avenue. The Project will comply with the March JPA's approved truck route ordinance. **MM-AQ-15** requires signs clearly identifying the approved truck routes be installed along the truck routes to and from the Project site and within the Project site.

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
4.7 Facility operators shall require their drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.	***Consistent***. Section 3.5.4, Off-Street Loading Facilities, of the Specific Plan requires that signage be posted to restrict parking and maintenance of all trucks to designated areas on site.
4.8 Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.	***Consistent***. **MM-AQ-21** requires tenants who employ 250 or more employees on a full- or part-time basis to comply with 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.
4.9 A minimum of 5% or as required by the Cal Green Code, whichever is greater of employee parking spaces shall be designated for electric or other alternative fueled vehicles.	***Consistent***. **MM-GHG-7** requires each site plan to provide circuitry, capacity, and equipment for EV charging stations in accordance with Tier 2 of the 2022 CALGreen Code, which provides for charging stations in excess of 5% of employee parking spaces.
4.10 If a public address (PA) system is being used in conjunction with a warehouse/distribution facility operations, the PA system shall be oriented away from sensitive receptors and the volume set at a level not readily audible past the property line.	***Consistent***. Section 3.5.4, Off-Street Loading Facilities, of the Specific Plan includes this restriction: "any loudspeaker, bells, gongs, buzzers, or other noise attention or attracting devices shall not exceed 55 dBA at any one time beyond the boundaries of the property. Sounds emitting from any of the aforementioned devices, including or live or recorded music, shall cease between the hours of 10:00 p.m. and 7:00 a.m. if the sound therefrom creates a noise disturbance across the property line of a residential use."
4.11 Facility Operation shall comply with the exterior noise decibel levels as required by Ord. 847 (Noise Ordinance), which includes a maximum exterior decibel level of 55 dba (between 7:00 a.m. and 10:00 p.m.) and 45 dba (between 10:00 p.m. and 7:00 a.m.) as measured on adjacent occupied residences, or as modified by the most current version of Ordinance No. 847.	***Consistent***. The Project's Noise Impact Analysis determined the Project's on-site operational noise would not exceed March JPA, County of Riverside, or City of Riverside standards. See Appendix M of the EIR. Section 3.5.4, Off-Street Loading Facilities, of the Specific Plan includes this restriction: "any loudspeaker, bells, gongs, buzzers, or other noise attention or attracting devices shall not exceed 55 dBA at any one time beyond the boundaries of the property. Sounds emitting from any of the aforementioned devices, including or live or recorded music, shall cease between the hours of 10:00 p.m. and 7:00 a.m. if the sound therefrom creates a noise disturbance across the property line of a residential use."
Signage	
5.1 Signs should be posted in the appropriate locations that trucks should not idle for more than five (5) minutes and that truck drivers should turn off their engines when not in use.	***Consistent***. **MM-AQ-17** requires legible, durable, weather-proof signs be placed at truck access gates, loading docks, and truck parking areas that identify instructions for truck drivers to shut off engines when not in use and instructions for drivers of diesel trucks to restrict idling to no more than 3 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged.

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
5.2 Signs should be posted in the appropriate locations that clearly show the designated entry and exit points for trucks and service vehicles.	***Consistent***. MM-AQ-12 requires an on-site signage program that clearly identifies the required on-site circulation system through posted signs and painting on driveways and internal roadways.
5.3 Signs should be posted in the appropriate locations that state parking and maintenance of all trucks is to be conducted within designated areas and not within the surrounding community or on public streets.	***Consistent***. Section 3.5.4, Off-Street Loading Facilities, of the Specific Plan, requires that signage be posted to restrict parking and maintenance of all trucks to designated areas on site.
5.4 Signs should be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services, if these services are not available onsite.	***Consistent***. MM-AQ-21 requires each facility to implement or join a Transportation Demand Management program, which would include offering shuttle service to and from public transit and commercial areas/food establishments, if warranted. Alternatively, the applicant could establish locations for food or catering truck service and cooperate with food service providers to provide consistent food service to employees.
5.5 Each Facility shall designate a Compliance Officer responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information should be provided to the County and updated annually, and signs should be posted in visible locations providing the contact information for the Compliance Officer to the surrounding community. These signs shall also identify the website and contact information for the South Coast Air Quality Management District.	***Consistent***. MM-AQ-16 requires signage with contact information for the tenant representative, March JPA, County of Riverside, and SCAQMD for complaints about excessive noise, dust, fumes, odors, and perceived code violations. MM-AQ-27 requires each tenant receive a copy of and comply with the Project MMRP. MM-AQ-25 requires the facility operator to monitor and ensure compliance with all current air quality regulations for on-road trucks including CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and the Statewide Truck and Bus Regulation, as applicable, by maintaining records on site demonstrating compliance and making records available for inspection by the local jurisdiction, air district, and state upon request.
5.6 Signs shall be posted in accordance with Ordinance No. 348, which may be amended from time to time.	***Not Applicable***. The signage requirements of the Project are subject to the Specific Plan and March JPA Development Code signage regulations. County Ordinance 348 is the County Code. The West Campus Upper Plateau signage will comply with the March JPA Development Code, Ordinance No. 19-03.
Community Benefits	
6.1 Applicants for proposed warehouse/distribution facilities shall engage in a community outreach effort to engage the existing community in determining issues of concern that can be addressed through site design and other means during the project land use entitlement process. Suggested outreach efforts include but are not limited to, hosting community meetings, making presentations at Municipal Advisory	***Consistent***. March JPA and the applicant conducted multiple public outreach efforts including three community meetings, two Technical Advisory Committee workshops, and one virtual presentation with a public notification radius of 2,000 feet around the perimeter of the project site, resulting in 2,172 public notices.

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
Councils and Community Councils, and hosting job fairs.	
6.2 Additionally project applicants shall post on-site notice in accordance with Planning Department requirements during the Notice of Preparation stage of the EIR, in order to provide opportunity for early public comment. Said on-site notice shall include a link to a project website provided by the applicant and the Planning Department's Notice of Preparation link. Website should include information such as a complete and accurate project description, maps and drawings of the project design, and directions for how communities can provide input. The website should be in a format that is easy to navigate and understand.	***Consistent***. The applicant has complied with the March JPA's public noticing requirements. The March JPA has a website and easily accessible link to access and review all Project documents, including a complete and accurate Project description and maps and drawings of the Project design, as well a comment section directed to March JPA staff.
6.3 Applicants for proposed new facilities should look beyond their immediate development footprint and look for opportunities to enhance the surrounding community through upgrades such as street paving, walls, landscaping, or other types of infrastructure improvements. On-site and off-site upgrades and improvements which offset potential air quality impacts, based on a showing of substantial evidence by means of a technical report as determined by the County, shall reduce the supplemental funding contribution policy listed in Section 6.4. On-site and off-site upgrades and improvements which could offset potential air quality impacts, include, not are not limited to: • Project design features that directly offset NOx reductions above and beyond what is required by existing air quality regulations; • • Project design features that generally improve air quality such as paving of dirt roads, installation of additional trees, landscaping, and air filters for sensitive receptors; • • Provision of additional buffers between the new facility and sensitive receptors, in addition to those setbacks required pursuant to Section 3.1 herein; and • • Project design features that lead to reduced emissions by promoting alternate forms of transportation such as bicycle lanes, new sidewalks, bus turnouts, or other transit-related uses.	***Consistent***. Table 3-2, Development Standards, of the Specific Plan requires Business Park and Mixed Use buildings greater than 100,000 SF to be set back a minimum of 800 feet from residential and buildings 100,000 SF or less to be set back a minimum of 300 feet from residential. Industrial buildings greater than 200,000 SF must be set back a minimum of 1,000 feet from residential. In addition, industrial-use buildings of any size will require a 1,000-foot setback from existing residential to any proposed truck courts or loading docks. Section 3.5.4, Off-Street Loading Facilities, and Section 4.4.2, Truck Courts and Loading Docks, of the Specific Plan require truck courts and loading docks to be oriented away or screened to reduce visibility from public roads, publicly accessible locations within the West Campus Upper Plateau Specific Plan, and surrounding residential properties and prohibits loading and unloading activities within view of public streets or residential land uses. Section 4.4.1, Walls and Fences, of the Specific Plan requires 14-foot-tall screen walls around all truck courts and loading docks. The 445.43-acre Conservation Easement will remain permanent open space and provide a buffer of at least 300 feet on all sides of the Specific Plan Area, with a larger buffer to the south and east of the Specific Plan Area. The currently existing service roads within the Conservation Easement would continue to be utilized by the public for passive recreation as authorized by the March JPA. The proposed Project includes a 60.28-acre Park west of the Barton Street extension under the Specific Plan buildout scenario. The recreational amenities analyzed include a playground; multi-use sports fields that could be used for soccer, football, and field hockey; and trails with cardio stops for recreational

Table 4.10-2. Project Consistency with Good Neighbor Policy for the County of Riverside

County Good Neighbor Policy	Consistency Analysis
	users. Only the Park and open space amenities would be accessible off of the Barton Street extension. In addition to Conservation Easement, there is an additional 120-foot landscaped buffer interface on the north side of the Specific Plan Area (see Figure 4.17 of the proposed Specific Plan). Section 4.5, Landscape Design Guidelines, of the Specific Plan requires additional landscape buffering between roadways and the Specific Plan Area boundary. Figure 5-4, Non-Motorized Circulation Plan, of the Specific Plan indicates the variety of sidewalks, bicycle lanes, and multi-use trails throughout the Specific Plan Area. Finally, the Project would construct the Meridian Fire Station.
6.4 Given the potential for community impacts related to the construction and operation of logistics and warehouse facilities, the applicant for any new facility may be required to provide a supplemental funding contribution, which would be applied to further off-set potential air quality impacts to the community and provide a community benefit above and beyond any CEQA related mitigation measures. Said financial contribution would generally be determined by the Transportation and Land Management Agency based on the level of nitrogen oxides (NOx) emissions generated by the project that exceeds the regional NOx significance thresholds established by the appropriate AQMD. Said supplemental funding contribution will be collected on a one-time basis. Funds collected under said supplemental funding program will be subject to designation for use by the Board of Supervisors, and will generally be used for projects that directly benefit the impacted community wherein the project is located.	***Not Applicable***. The Project is under March JPA jurisdiction, and the March JPA has not established a policy for in lieu fees for environmental air quality impacts. Though no in lieu fee policy has been established, the public amenities listed in response to Policy 6.3 above are considerable.
6.5 The County recognizes that the South Coast Air Quality Management District is studying and considering the implementation of a mitigation fee program that would apply to logistics and warehouse uses. Should South Coast AQMD adopt a mitigation fee program that covers similar uses to achieve additional air quality benefits as intended by Section 6.3, the County recognizes that participation in said South Coast AQMD fee program would offset the supplemental fee requirement in Section 6.3.	***Consistent***. The Project will be required to comply with the SCAQMD fee as adopted.

As shown in Table 4.10-2, the Project would be generally consistent with the policies of the Good Neighbor Policy of the County of Riverside. Where appropriate, mitigation measures are included to reduce and/or avoid potential conflicts with applicable policies adopted for the purpose of avoiding or mitigating an environmental effect. As such, impacts related to consistency with the Good Neighbor Policy of the County of Riverside would be **less than significant with mitigation incorporated**.

4.10.5 Mitigation Measures

As demonstrated throughout this EIR, significant and unavoidable impacts would occur even with the incorporation of **MM-AQ-5~~2~~** through **MM-AQ-27~~15~~** and **MM-CUL-1** through **MM-CUL-9**. In addition, the Project would result in significant and unavoidable impacts related to traffic noise increases along Cactus Avenue east of Meridian Parkway (Segment #13 – non-sensitive land use). No feasible mitigation measures are available to reduce this impact to a less than significant level.

However, as demonstrated in the consistency analysis above, and with the incorporation of Project Design Features identified in Chapter 3, Project Description, as well as **MM-AQ-1** through **MM-AQ-27~~15~~**, **MM-BIO-1** through **MM-BIO-9**, **MM-GEO-1**, **MM-GEO-2**, **MM-GHG-1** through **MM-GHG-11**, **MM-HAZ-1** through **MM-HAZ-3**, **MM-HYD-1** through **MM-HYD-3**, **MM-TRA-1** and **MM-TRA-2**, and **MM-FIRE-1** through **MM-FIRE-3,** land use conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect would not occur, and as such, impacts would be **less than significant with mitigation incorporated.**

4.10.6 Level of Significance After Mitigation

With the incorporation of mitigation, as discussed above, the Project would not result in conflicts with existing applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect. As such, with mitigation, the Project would result in **less than significant** land use impacts.

4.10.7 Cumulative Effects

The proposed Project requests a General Plan Amendment, Specific Plan, Zoning Amendment, Vesting Tentative Tract Map, two Plot Plans, and a Development Agreement to redevelop the former munitions bunkers of the March AFB and establish a conservation easement. ~~As demonstrated above, the proposed Project would result in conflicts with existing applicable land use plans and policies adopted for the purpose of avoiding or mitigating an environmental effect, such as air quality, cultural resources, and noise.~~ The proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Draft Environmental Justice Element. Where appropriate, mitigation measures are included to reduce and/or avoid potential conflicts with applicable goals and policies adopted for the purpose of avoiding or mitigating an environmental effect.

Table 4-1, Related Projects, within Chapter 4, Environmental Analysis, of this EIR includes a list of cumulative development proposals within the vicinity of the Project site. Proposed future cumulative projects will undergo an evaluation for consistency with local land use policies, as the proposed Project has done above. Planned future development identified in Table 4-2~~1~~ has been anticipated in the General Plans prepared by the local jurisdictions surrounding the Project site or through the General Plan Amendment process. As demonstrated in the analysis above, with incorporation of mitigation, the Project would not result in significant and unavoidable land use impacts through conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the proposed Project, when viewed in context with the cumulative development proposals, is not expected to result

in adverse cumulative land use impacts. Therefore, the proposed Specific Plan is expected to result in **less than cumulatively considerable** land use impacts.

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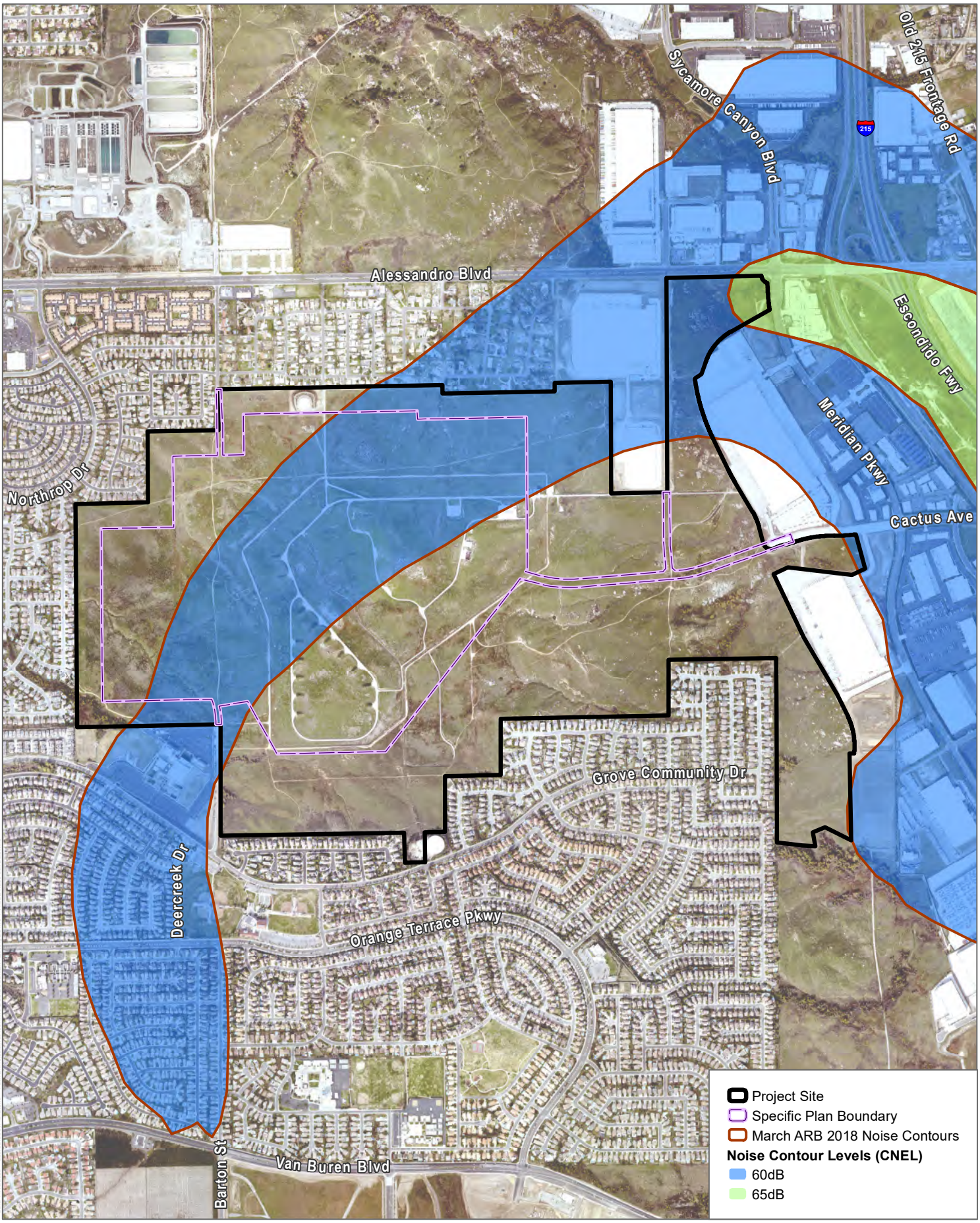

SOURCE: Riverside County 2019; March Air Reserve Base Final AICUZ Study 2018

DUDEK

0 750 1,500 Feet

FIGURE 4.10-1

AICUZ Noise Contours

West Campus Upper Plateau EIR

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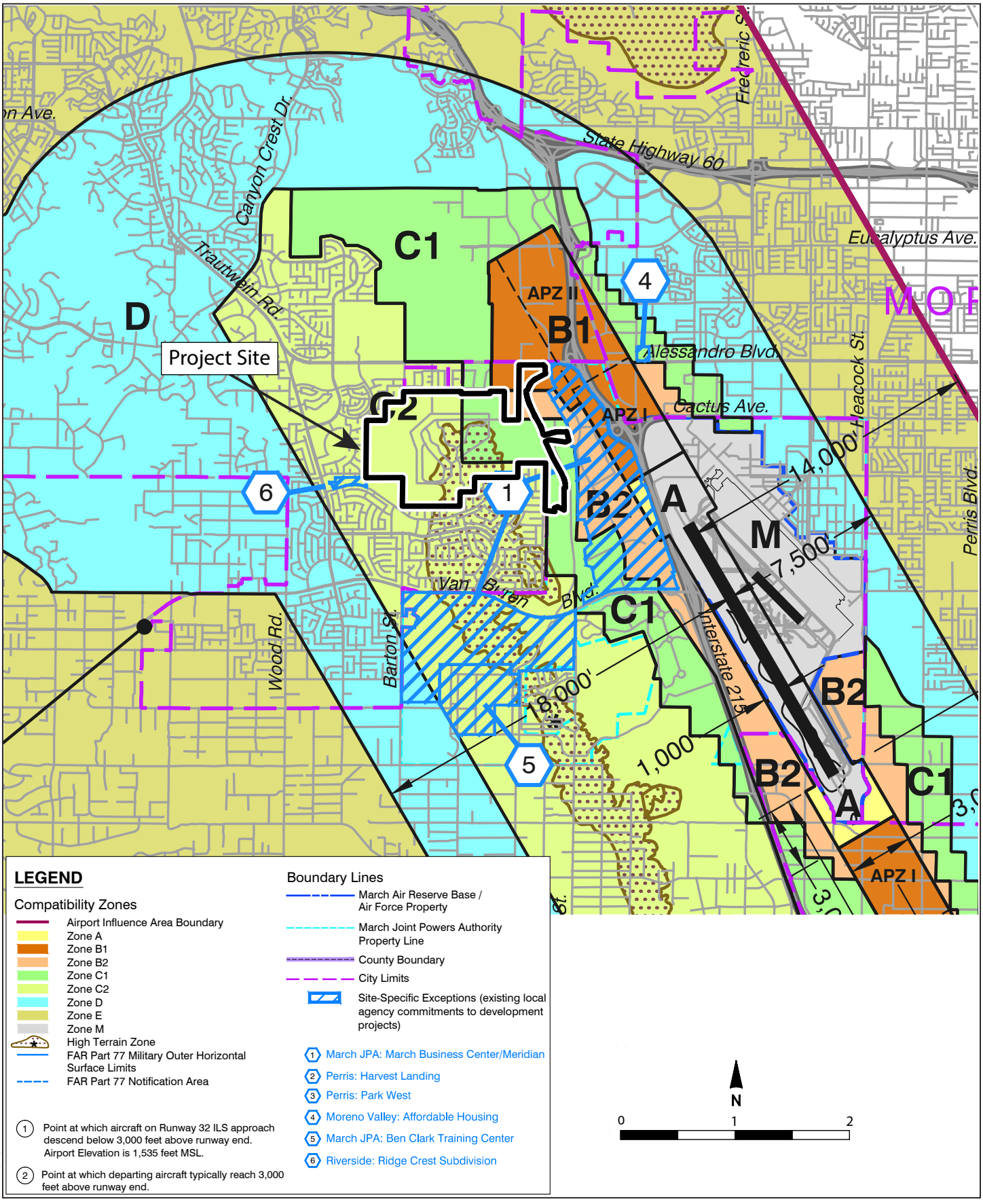

SOURCE: Mead & Hunt 2014

FIGURE 4.10-2

ALUC Compatibility Map

West Campus Upper Plateau EIR

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