Final Environmental Impact Report

Meridian D-1 Gateway Aviation Center Project

SCH NO. 20210400012

DECEMBER 2025

Prepared for:

MARCH INLAND PORT AIRPORT AUTHORITY

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AB	Assembly Bill
AC	Advisory Circular
ACE	Affordable Clean Energy
AEDT	Aviation Environmental Design Tool
AERMOD	American Meteorological Society/U.S. Environmental Protection Agency Regulatory Model
AFB	Air Force Base
AICUZ	Air Installations Compatibility Use Zones
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
APE	area of potential effects
APN	Assessor's Parcel Number
APZ	Accident Potential Zone
AQMP	air quality management plan
ARB	Air Reserve Base
ASA	Acoustical Society of America
BAU	business-as-usual
bgs	below ground surface
ВМР	best management practice
BSA	biological study area
BTR	Biological Technical Report
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CadnaA	Computer-Aided Noise Abatement
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEnviroScreen	California Communities Environmental Health Screening Tool
CALGreen	California Green Building Standards
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CESA	California Endangered Species Act
CFR	Code of Federal Regulations

Acronym/Abbreviation	Definition
cfs	cubic feet per second
CH ₄	methane
CHRIS	California Historical Resources Information System
CMP	Congestion Management Program
CNEL	community noise equivalent level
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Resources
CRMTP	Cultural Resource Monitoring and Treatment Plan
CRPR	California Rare Plant Rank
CTMP	Construction Traffic Management Plan
CWA	Clean Water Act
CY	cubic yard
CZ	Clear Zone
DAF	U.S. Department of the Air Force
dB	decibel
dBA	A-weighted decibel
DDT	dichlorodiphenyltrichloroethane
DEH	Department of Environmental Health
DIF	development impact fee
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EA	Environmental Assessment
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMFAC	EMission FACtor
EMWD	Eastern Municipal Water District
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	federal Endangered Species Act
ESL	Environmental Screening Level
EV	electric vehicle
FAA	Federal Aviation Administration
FAC	facultative
FACU	facultative upland
FACW	facultative wetland
FEMA	Federal Emergency Management Agency
FICON	Federal Interagency Committee on Noise
FHWA	Federal Highway Administration
FTA	Federal Transportation Administration
FW	federal waters
GCR	General Conformity Rule
GHG	greenhouse gas

Acronym/Abbreviation	Definition
gpm	gallons per minute
GVWR	gross vehicle weight rating
GWP	global warming potential
H&SC	California Health and Safety Code
HAP	hazardous air pollutant
HARP	Hotspots Analysis and Reporting Program
HBW	home-based work
HCOC	Hydrologic Conditions of Concern
HCP	Habitat Conservation Plan
HDPE	high-density polyethylene pipe
HERO	Human and Ecological Response Office
HFC	hydrofluorocarbon
HMBP	hazardous materials business plan
HMCP	hazardous materials contingency plan
hp	horsepower
HPI	Healthy Places Index
1	Interstate
IEPR	Integrated Energy Policy Report
in/sec	inches per second
IPCC	Intergovernmental Panel on Climate Change
ISO	International Standards Organization
ISTEA	Intermodal Surface Transportation Efficiency Act
JPA	Joint Powers Authority
kBTU	thousand British thermal units
kWh	kilowatt-hour
L ₂	noise levels equaled or exceeded during 2% of specified time
L ₈	noise levels equaled or exceeded during 8% of specified time
L ₂₅	noise levels equaled or exceeded during 25% of specified time
L ₅₀	noise levels equaled or exceeded during 50% of specified time
LCFS	Low-Carbon Fuel Standard
L _{dn}	day/night sound level
L _{eq}	energy equivalent sound level
LID	low-impact development
L _{max}	maximum noise level during a noise measurement period
L _{min}	minimum noise level during a noise measurement period
LOS	level of service
LST	localized significance threshold
MARB	March Air Reserve Base
mgd	million gallons per day
MIP	March Inland Port
MIPAA	March Inland Port Airport Authority
MLD	most likely descendant
MM	Mitigation Measure

Acronym/Abbreviation	Definition
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric ton
MOB 5	Main Operating Base 5
mpg	miles per gallon
MPO	metropolitan planning organization
MS4	Municipal Separate Storm Sewer System
MSHCP	Multiple Species Habitat Conservation Plan
MT	metric ton
MWELO	Model Water Efficient Landscape Ordinance
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NAVD 88	North American Vertical Datum of 1988
NCCP	Natural Community Conservation Planning
NDC	nationally determined contribution
NEPA	National Environmental Policy Act
NF ₃	nitrogen trifluoride
NHTSA	National Highway Traffic Safety Administration
NL	not listed
NO	nitric oxide
NOP	Notice of Preparation
NOx	oxides of nitrogen
NO ₂	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWW	non-wetland waters
OBL	obligate wetland
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OU	Operable Unit
OWHM	ordinary high water mark
PAH	polycyclic aromatic hydrocarbon
PAPI	precision approach path indicator
PCB	polychlorinated biphenyl
PDF	Project Design Feature
PFC	perfluorocarbon
PFOA	perfluorooctanoic acid
PFOS	perfluorooctane sulfonate
Phase I ESA	Phase I Environmental Site Assessment
PM _{2.5}	fine particulate matter
PM ₁₀	coarse particulate matter
PPA	Potential Ponding Area
ppb	parts per billion
	

Acronym/Abbreviation	Definition
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
psi	pounds per square inch
RCDWR	Riverside County Department of Waste Resources
RCFD	Riverside County Fire Department
RCNM	Roadway Construction Noise Model
RCRA	Resource Conservation and Recovery Act
RCSD	Riverside County Sheriff's Department
RIVCOM	Riverside County Transportation Demand Model
ROD	Record of Decision
RPS	Renewables Portfolio Standard
RSL	regional screening level
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
S	Swale
SARA	Superfund Amendments and Reauthorization Act
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
SF ₆	sulfur hexafluoride
SGMA	Sustainable Groundwater Management Act
SHP	Soil Handling Plan
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO ₂	sulfur dioxide
SO ₄	sulfates
SoCalGas	Southern California Gas Company
SRA	Source Receptor Area
SVE	soil vapor extraction
SW	state wetlands
SWPPP	stormwater pollution prevention plan
SWRCB	State Water Resources Control Board
TA	Traffic Analysis
TAC	toxic air contaminant
TCE	trichloroethylene
TCR	tribal cultural resource
TDM	Transportation Demand Management
TEA-21	Transportation Equity Act for the 21st Century
TMDL	total maximum daily load
TUMF	Transportation Uniform Mitigation Fee

Acronym/Abbreviation	Definition
TWA	time-weighted average
UPL	obligate upland
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compound
WDID	Waste Discharge Identification
WDR	Waste Discharge Requirement
WMWD	Western Municipal Water District
WRCOG	Western Riverside Council of Governments
WW	wetland waters

I Preface

I.1 Purpose

The March Joint Powers Authority ("March JPA") is a joint powers agency comprised of the County of Riverside, the City of Riverside, the City of Moreno Valley, and the City of Perris (collectively, the "Member Agencies") created by a Joint Powers Agreement dated September 7, 1993 to act as the federally recognized reuse authority, redevelopment agency, and airport authority for the former March Air Force Base. Pursuant to Government Code section 6502 and section 1 of the Joint Powers Agreement, as amended, the Member Entities delegated to March JPA the power and authority to operate and manage the March Inland Port Airport Authority and its civilian airport and having all the rights, powers, and duties related thereto including authority for airport master planning and authority to collect and retain, for airport purposes, any and all lease revenues from airport properties.

In April 2023, the Member Agencies entered into the 14th Amendment to the Joint Powers Agreement, which transferred land use authority of non-airport property to the County of Riverside ("14thAmendment"). Specifically, through operation of the 14th Amendment, post-July 1, 2025, the March Inland Port Airport Authority, a California airport authority, established by the March Joint Powers Commission of the March JPA ("MIPAA") now exercises land use authority over the MIPAA territory as shown in Exhibit B to the 14th Amendment, and retains control over the operations and development of the March Inland Port Airport, including the Meridian D-1 Gateway Aviation Center Project site.

On May 23, 2024, pursuant to the California Environmental Quality Act ("CEQA") the March JPA published a Draft Environmental Impact Report ("EIR") for the Project. The Draft EIR (SCH Number 2021040012) states that the March JPA is the "lead agency" for the Project, but, per the 14th Amendment, as of July 1, 2025, MIPAA (who prior to July 1, 2025 had land use authority and control over development of the March Inland Port Airport as a part of the March JPA) is now the more appropriate lead agency. As such, and consistent with case law, MIPAA is utilizing the environmental documents prepared by March JPA. *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1383 (court held it was proper for the city to utilize the CEQA documents prepared by the county prior to incorporation); see *also*, State CEQA Guidelines § 15052.

This Final EIR has been prepared by MIPAA for the Meridian D-1 Gateway Aviation Center Project (Proposed Project). This Final EIR has been prepared in conformance with the CEQA statute (California Public Resources Code, Section 21000 et seq., as amended) and implementing guidelines (14 CCR 15000 et. seq.).

Before approving a project, CEQA requires the lead agency to prepare and certify a Final EIR. MIPAA has the principal responsibility for approval of the Proposed Project and is therefore considered the lead agency under CEQA Section 21067. According to CEQA Guidelines Section 15132, the Final EIR shall consist of the following:

- The Draft EIR or a revision of the Draft EIR
- Comments and recommendations received on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the lead agency to significant environmental points raised in the review and consultation process
- Any other information added by the lead agency

I.2 Format of the Final EIR

This Final EIR consists of the May 2024 Draft EIR and the following four chapters:

I Preface. This chapter summarizes the contents of the Final EIR and the environmental review process.

Il Responses to Comments. During the public review period for the Draft EIR, 221 comment letters were received. This chapter contains these comment letters and MIPAA's responses to the comments.

III Errata. Comments that are addressed in Chapter II may have resulted in minor revisions to the information contained in the May 2024 Draft EIR. Where necessary, deletions to the text are shown in strikeout and additions to the Draft EIR text are shown in double underline in this chapter.

IV Mitigation Monitoring and Reporting Program. This section of the Final EIR provides the mitigation monitoring and reporting program (MMRP) for the Proposed Project. The MMRP is presented in table format and identifies mitigation measures for the Proposed Project, the implementation period for each measure, the implementing party, and the enforcing agency. The MMRP also provides a section for recordation of mitigation reporting.

Appendices are included to support the Responses to Comments and revisions in the Errata, as follows:

- Appendix N-5: EMWD Sewer Capacity Study
- Appendix N-6: Correspondence with WMWD
- Appendix N-7: WMWD Conditions of Approval for Proposed Project
- Appendix P: Meridian D-1 Project Aviation CNEL Scenarios
- Appendix Q: Regional Air Cargo Capacity Overview
- Appendix R: Riverside County ALUC Consistency Finding Letter, dated March 13, 2025
- Appendix S-1: Alternative 3 AQ/GHG/Energy/HRA Analysis
- Appendix S-2: Alternative 4 AQ/GHG/Energy/HRA Analysis
- Appendix S-3: Alternative 6 AQ/GHG/Energy Analysis

1.3 Environmental Review Process

I.3.1 Notice of Preparation

March JPA determined that an EIR would be required for the Proposed Project and issued an NOP, which was distributed to the State Clearinghouse, interested agencies, and groups on March 31, 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. The 30-day NOP public review period ended April 29, 2021. Comments received during the NOP public review period were considered during the preparation of this EIR. The NOP and NOP comments are included in Appendix A of the Draft EIR.

I.3.2 Noticing and Availability of the Draft EIR

The Draft EIR was made available for public review and comment pursuant to CEQA Guidelines Section 15087. The 45-day public review period for the Draft EIR occurred from May 23, 2024, through July 9, 2024, and was extended to July 22, 2024, for a total of 60 days. At the beginning of the public review period, an electronic copy of the Draft EIR and an electronic copy of the Notice of Completion were submitted to the State Clearinghouse. Relevant state agencies, including CARB, Caltrans, CDFW, California NAHC, State Office of Historic Preservation, California Department of Parks and Recreation, CEC, SWRCB and RWQCB, California Natural Resources Agency, CalRecycle, Department of General Services, Department of Housing and Community Development, DTSC, and California Department of Water Resources also received electronic copies of the documents. A Notice of Availability was distributed to all owners of property within a 300-foot radius of the project site and filed with the Riverside County Clerk. The Notice of Availability described where the document was available and how to submit comments on the Draft EIR. The Notice of Availability and Draft EIR were also made available for public review, by appointment, at the March JPA offices (14205 Meridian Parkway, Suite 140, Riverside, California 92518). Additionally, the document was available to be viewed on the March JPA website at:

https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

The 60-day public review period provided interested public agencies, groups, and individuals the opportunity to comment on the contents of the Draft EIR.

I.3.3 Final EIR

The Final EIR addresses the comments received during the public review period and includes minor changes to the text and figures of the Draft EIR. This Final EIR will be presented to the March Joint Powers Commission for potential certification as the environmental document for the Proposed Project. All agencies who commented on the Draft EIR will be provided with a copy of the Final EIR, pursuant to CEQA Guidelines Section 15088(b). The Final EIR will also be posted on the March JPA website at:

https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

Pursuant to CEQA Guidelines Section 15091, the March Joint Powers Commission shall make findings for each of the significant effects identified in this EIR and shall support the findings with substantial evidence in the record. After considering the Final EIR in conjunction with making findings under Section 15091, the lead agency may decide whether or how to approve or carry out the Proposed Project. When a lead agency approves a project that will result in the occurrence of significant effects that are identified in the Final EIR but are not avoided or substantially lessened, the agency is required by CEQA to state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. Because the Proposed Project would result in significant and unavoidable impacts, a statement of overriding considerations will be prepared pursuant to CEQA Guidelines Section 15093 and supported by substantial evidence in the record.

I.4 Revisions to the Draft EIR

The comments received during the public review period for the Draft EIR resulted in several clarifications and modifications in the text and figures of the May 2024 Draft EIR. In addition, minor editorial corrections have been

made in sections of the Draft EIR. These changes are included as part of the Final EIR, to be presented to the March Joint Powers Commission for certification prior to Proposed Project approval.

CEQA Guidelines Section 15088.5 identifies when a lead agency must recirculate an EIR. 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 but before certification of the Final EIR. Information includes changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not considered 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 (including a feasible project alternative) that the project's proponents have declined to implement. As defined in CEQA Guidelines Section 15088.5(a), significant new information requiring recirculation includes the following:

- 1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- 2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- 4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

As stated in CEQA Guidelines Section 15088.5(b), "recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR." The minor clarifications, modifications, and editorial corrections that were made to the Draft EIR are shown in Chapter III of this Final EIR. As demonstrated in this Final EIR, none of the clarifications, modifications, or editorial corrections presented in this Final EIR constitute significant new information warranting recirculation of the EIR as set forth in CEQA Guidelines Section 15088.5.

II Responses to Comments

The Draft EIR for the Meridian D-1 Gateway Aviation Center Project (Proposed Project) was circulated for a 45-day public review from May 23, 2024, to July 9, 2024, in accordance with Section 15105(a) of the CEQA Guidelines. It should be noted that, although not required by CEQA guidelines, the public review period was extended to July 22, 2024, as requested by the public.

A total of 211 written comment letters were received on the EIR from agencies, organizations, and individuals, as shown in Sections II.1 through II.5 of this Final EIR. Each of the written comment letters has been assigned an alphanumeric label, and the individual comments within each written comment letter are bracketed and numbered. For example, Comment Letter A-1 contains six comments that are numbered A-1.1 through A-1.6.

In response to various comments received on the EIR, the responses included in this chapter include responses to Form Letters, as well as responses to Frequently Asked Questions (FAQs). Responses to Form Letters address identical comment letters received from different individuals and responses to FAQs address commonly raised questions so as not to be repeated in each individual response, but rather cross-referenced in individual letter responses where applicable.

The responses to each comment on the EIR represent a good-faith, reasoned effort to address the environmental issues identified by the comments. Pursuant to Section 15088(a) of the CEQA Guidelines, MIPAA, as lead agency, is not required to respond to all comments on the EIR, only those comments that raise significant environmental issues. In accordance with CEQA Guidelines Sections 15088 and 15204, MIPAA has independently evaluated the comments and prepared, or caused to be prepared, the attached written responses to any significant environmental issues raised.

II.1 Responses to Form Letter A Comments

Comment Letter	Individual Commenter Name	Date
I-4	Karen Jakpor	7/1/2024
I-5	Patty Huddleston	7/1/2024
I-6	Peter Pettis	7/1/2024
I-8	Michele Muehls	7/1/2024
I-9	Kirk Wolf	7/1/2024
I-11	Ira Long	7/1/2024
I-12	Janice Oien	7/1/2024
I-13	Jonathan Peaslee	7/1/2024
I-14	Jennifer Guzman	7/1/2024
I-15	John W. Hagmann	7/1/2024
I-17	Gayle DiCarlantonio	7/1/2024
I-18	Fera S. Momtaz	7/1/2024
I-19	Eunhee Kim	7/1/2024
I-20	Deb Whitney	7/1/2024
I-21	Dennise Jimenez	7/1/2024
I-22	Richard Stalder	7/1/2024
I-23	Carolyn Rasmussen	7/1/2024

Comment Letter	Individual Commenter Name	Date
I-24	Christine Martin	7/1/2024
I-25	Candy Blokland	7/1/2024
I-26	Brian Wardle	7/1/2024
I-27	Betty Hao	7/1/2024
I-28	Beverly Arias	7/1/2024
I-29	Ann Marchand	7/1/2024
I-30	Amber Peaslee	7/1/2024
I-31	Jessica McDermott	7/1/2024
I-32	Abby Banning	7/1/2024
I-33	Aaron Bushong	7/1/2024
I-34	John Viafora	7/1/2024
I-35	Abdallah Karim	7/1/2024
I-36	Joe Aklufi	7/1/2024
I-37	Ajay Shah	7/1/2024
I-38	Lenora Mitchell	7/1/2024
I-39	K. Doty	7/1/2024
I-40	Josie Sosa	7/1/2024
I-41	Jade Sasser	7/1/2024
I-42	Matt Silveous	7/1/2024
I-43	Melissa Suarez	7/1/2024
I-44	Mary Viafora	7/1/2024
I-45	Nicole Bernas	7/1/2024
I-46	Molly Nazeck	7/1/2024
I-47	Milo J. Rivera	7/1/2024
I-48	Steve Huddleston	7/1/2024
I-49	Victoria Belova	7/1/2024
I-50	Shaan Saigol	7/1/2024
I-51	Sue Nipper	7/1/2024
I-52	Suzanne Page	7/2/2024
I-54	Maria Rodriguez	7/2/2024
I-55	Laura Sandidge	7/2/2024
I-57	Holly Wolf	7/2/2024
I-58	Linda Tingley Rivera	7/2/2024
I-59	Linlin Zhao	7/2/2024
I-60	David Drexler	7/2/2024
I-62	Ana Ramirez	7/2/2024
I-63	Anthony Scimia Jr.	7/2/2024
I-65	Corinne Perez	7/2/2024
I-66	Steven Balmer	7/2/2024
I-68	Steve and Patty Huddleston	7/3/2024
I-69	Julie Weatherford	7/4/2024
I-70	Candi Erwin	7/4/2024
I-72	Carlos Lliguin	7/6/2024

Comment Letter	Individual Commenter Name	Date
I-74	Frank and Michelle Erdodi	7/8/2024
I-77	Teresa Alcala	7/9/2024
I-92	Ying Shen	7/18/2024
I-100	Clinton Clark	7/21/2024
I-101	Clinton Clark	7/21/2024
I-102	Cynthia Jessen	7/21/2024
I-103	Deb Whitney	7/21/2024
I-104	Eunhee Kim	7/21/2024
I-106	Franco Pacheco	7/21/2024
I-107	Fernando Sosa Jr.	7/21/2024
I-108	Gary Barnes	7/21/2024
I-110	Gayle DiCarlantonio	7/21/2024
I-111	Jennifer A. Diaz	7/21/2024
I-112	Greg Morris	7/21/2024
I-113	Joseph Aklufi	7/21/2024
I-114	John Farnsworth	7/21/2024
I-115	Kerry Hanson	7/21/2024
I-116	Greg Renne	7/21/2024
I-117	John N. Chizo	7/21/2024
I-118	Jonathan Peaslee	7/21/2024
I-119	Mark Jessen	7/21/2024
I-120	Mark Lien	7/21/2024
I-122	Matt Silveous	7/21/2024
I-123	Sharon Barnes	7/21/2024
I-124	Sandi Cabrera	7/21/2024
I-125	Shirley Ng	7/21/2024
I-126	Josie Sosa	7/21/2024
I-127	Michael Hampton	7/21/2024
I-128	Maria Estabrooks	7/21/2024
I-129	Michele Muehls	7/21/2024
I-130	Veronica Juarez	7/21/2024
I-131	William Landa	7/21/2024
I-138	Chris Schulte	7/22/2024
I-139	Jeannine Sabel	7/22/2024
I-141	Gale Schulte	7/22/2024
I-146	Frank and Michelle Erdodi	7/22/2024
I-151	Corinne Perez	7/22/2024
I-156	Don Schulte	7/22/2024
I-163	Jillian Menez	7/22/2024
l-182	Ruth Ann Ryan	7/22/2024
l-188	Dawn Villavicencio	7/22/2024
I-192	Ajay Shah	7/23/2024
I-194	Carlos Lliguin	7/24/2024

Form Letter A

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Dear Mr. Smith,	
Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.	FL-A.1
Consider:	
1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.	FL-A.2
2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.	FL-A.3
3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.	FL-A.4
4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.	FL-A.5
Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.	FL-A.6

environmentally-harmful, community-focused alternatives.

Thank you.

I have been a longtime resident and we simply do not need this.

- **FL-A.1** This comment raises general concerns about the analysis in the EIR. Specific comments are addressed in the following responses.
- This comment raises concerns regarding health impacts of noise, specifically insomnia, substance abuse, and cardiovascular disease. Goal 2 of the March JPA General Plan Noise/Air Quality Element aims to "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." In 2008, the National Academies of Sciences, Engineering, and Medicine released "Effects of Aircraft Noise: Research Update on Select Topics," which stated "[t]rying to identify, measure, and quantify any potential effects of aviation noise on health is a complex and difficult field of study. Variations on how to identify and/or measure the noise exposure itself (single dose, long-term average, number of events above a certain level, etc.), and attempting to separate the effects from other life events are difficult at best. For example, lifestyles, life's stressors, hereditary factors, and genetic composition are just a few factors that may distort potential results of an aviation noise health effects study." The report reviewed:
 - Cardiovascular effects: "Some studies have identified a potential correlation between increased hypertension and aviation or road noise above certain noise thresholds; however, other studies contradict such findings. Occupational noise often becomes an intricate concern."
 - Effects on children: "Neither psychiatric disorders nor environmental factors showed any relationship to noise; however, psychophysiological parameters (e.g., heart rate and muscle tension) did demonstrate some relationship to noise."
 - Hospitals and care facilities: "Most airport noise and land-use compatibility guidelines list
 hospitals and care facilities as noise-sensitive uses, although there are no studies that have
 identified health effects associated with aviation noise."
 - Hearing impairment: "recent studies conclude aviation noise does not pose a risk factor for child or adolescent hearing loss, but perhaps other noise sources (personal music devices, concerts, motorcycles, or night clubs) are a main risk factor. Because aviation and typical community noise levels near airports are not comparable to the occupational or recreational noise exposures associated with hearing loss, hearing impairment resulting from community aviation noise has not been identified."

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

FL-A.3 This comment raises concerns about noise impacts to residential neighborhoods to the west of I-215 and northwest of March ARB/Inland Port Airport. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are

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National Academies of Sciences, Engineering, and Medicine. 2008. Effects of Aircraft Noise: Research Update on Select Topics. Washington, DC: The National Academies Press. https://doi.org/10.17226/14177.

modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS was obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and "Transient" (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based upon the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest.

The comment further raises concerns about March cargo operations in 2005–2008, apparently referring to DHL operations which are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.² As of 2024, there were fewer than 20 DC-9s still in service.³ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁴ This Project is not related to past cargo operations and is separate from the 2005-2008 DHL cargo flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- **FL-A.4** This comment generally claims the EIR contains "numerical errors and omissions" but does not identify any specific concerns.
- **FL-A.5** This comment raises general concerns regarding claims made by past developers and March JPA but does not identify any specific claims. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **FL-A.6** This comment raises general concerns about the EIR's analysis of the Proposed Project and suggests the consideration of alternatives but does not provide any specific concerns or recommendations.

 $^{^2 \}qquad \text{https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation} \\$

³ https://simpleflying.com/dc-9-operators-2024/

⁴ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

Chapter 5, Alternatives, of the EIR analyzes four alternatives for potential impacts. Additionally, the Proposed Project is separate from, and not related to, the 2005–2008 cargo flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

II.2 Responses to Form Letter B Comments

Comment Letter	Individual Commenter Name	Date
I-84	April Alvarado	7/17/2024
I-85	Cesar Collazo	7/17/2024
I-86	Edith Gingerich	7/17/2024
I-87	Frances Sladek, PhD	7/17/2024
I-88	Margarit Curras-Collazo	7/17/2024
I-91	Tara and Mark Byerly	7/18/2024
I-93	Marita Schleicher	7/19/2024
I-94	Bernd Schleicher	7/19/2024
I-97	Elaine Miller	7/20/2024
I-98	Michelle Calanchini	7/20/2024
I-99	Catherine Barrett-Fischer	7/21/2024
I-109	Mike and Kerrie Hudson	7/21/2024
I-121	Scott Rose	7/21/2024
I-189	Rural Association of Mead Valley, Debbie Walsh	7/22/2024
I-195	Jimmy Calanchini	7/24/2024
I-196	Kathleen Bocian	7/24/2024

Form Letter B

More Cargo Planes at March

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.	FL-B.1
Please Consider:	
1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.	FI-B 2
2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.	FL-B.3
3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to checits claims.	k I FL-B.4
4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.	TFL-B.5
5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitroger oxides (NOx), and particulate matter (PM)during flight.	I FL-B.6
6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.	I FL-B.7
7) Cargo plane noise can adversely affect the academic performance of our children.	I FL-B.8
The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermine as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.	
We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.	FL-B.10

- **FL-B.1** This comment raises general opposition to the Proposed Project. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- FL-B.2 This comment raises concerns regarding the impacts of noise on health, specifically insomnia, substance abuse, and cardiovascular disease. Goal 2 from the March JPA General Plan Noise/Air Quality Element aims to "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." In 2008, the National Academies of Sciences, Engineering, and Medicine released "Effects of Aircraft Noise: Research Update on Select Topics," which stated "[t]rying to identify, measure, and quantify any potential effects of aviation noise on health is a complex and difficult field of study. Variations on how to identify and/or measure the noise exposure itself (single dose, long-term average, number of events above a certain level, etc.), and attempting to separate the effects from other life events are difficult at best. For example, lifestyles, life's stressors, hereditary factors, and genetic composition are just a few factors that may distort potential results of an aviation noise health effects study." The report reviewed the following:
 - Cardiovascular effects: "Some studies have identified a potential correlation between increased hypertension and aviation or road noise above certain noise thresholds; however, other studies contradict such findings. Occupational noise often becomes an intricate concern."
 - Effects on children: "Neither psychiatric disorders nor environmental factors showed any relationship to noise; however, psychophysiological parameters (e.g., heart rate and muscle tension) did demonstrate some relationship to noise."
 - Hospitals and care facilities: "Most airport noise and land-use compatibility guidelines list
 hospitals and care facilities as noise-sensitive uses, although there are no studies that have
 identified health effects associated with aviation noise."
 - Hearing impairment: "recent studies conclude aviation noise does not pose a risk factor for child or adolescent hearing loss, but perhaps other noise sources (personal music devices, concerts, motorcycles, or night clubs) are a main risk factor. Because aviation and typical community noise levels near airports are not comparable to the occupational or recreational noise exposures associated with hearing loss, hearing impairment resulting from community aviation noise has not been identified."

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

FL-B.3 This comment raises concerns about noise impacts to residential neighborhoods to the west of I-215 and northwest of March ARB/Inland Port Airport. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are

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National Academies of Sciences, Engineering, and Medicine. 2008. Effects of Aircraft Noise: Research Update on Select Topics. Washington, DC: The National Academies Press. https://doi.org/10.17226/14177.

modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS was obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and "Transient" (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based upon the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest.

The comment further raises concerns about March cargo operations in 2005-2008, apparently referring to DHL operations which are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁶ As of 2024, there were fewer than 20 DC-9s still in service.⁷ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁸ The Proposed Project is not related to past cargo operations and is separate from the 2005–2008 DHL cargo flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- **FL-B.4** This comment generally claims the EIR contains "numerical errors and omissions" but does not identify any specific concerns.
- **FL-B.5** This comment raises general concerns regarding claims made by past developers and March JPA. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- FL-B.6 This comment generally states that cargo aircraft emit GHGs, CO₂, oxides of NO_x, and particulate matter. Section 3.2, Air Quality, and Section 3.7, Greenhouse Gas Emissions, of the EIR discussed the sources of emissions from the Proposed Project and disclosed that the Proposed Project would generate NO_x.

 $^{^{6} \}qquad \text{https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation} \\$

⁷ https://simpleflying.com/dc-9-operators-2024/

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

coarse particulate matter (PM_{10}), fine particulate matter ($PM_{2.5}$), and GHGs, including CO_2 . The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.

- FL-B.7 This comment generally states that GHG emissions contribute to climate change. Section 3.7, Greenhouse Gas Emissions, of the EIR discusses impacts of climate change. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- FL-B.7 This comment generally states that GHG emissions contribute to climate change. Section 3.7, Greenhouse Gas Emissions, of the EIR discusses impacts of climate change. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- FL-B.8 This comment raises concerns regarding aircraft noise impacts to children's academic performance. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR. Nevertheless, as shown in Table 3.11-23 of the Draft EIR, three elementary or middle schools (Rainbow Ridge Elementary, March Middle, and Serrano Elementary) east of the project site currently experience aviation noise less than 50 dBA CNEL and remain geographically well beyond the 60 dBA CNEL contour on Figures 3.11-11 and 3.11-12 that include contribution of Proposed Project cargo flight operations to future aviation noise levels. Similarly, Mead Valley Elementary, Manuel L. Real Elementary, Tomas Rivera Elementary, and Amelia Earhart Elementary, representing the closest schools to the west, are also well beyond the 60 dBA CNEL contour. To the north, Edgemont Elementary, Towngate Elementary, and Moreno Valley High School are the nearest schools to the project site that are also beyond the 60 dBA CNEL contour; and the same can be said for Val Verde High School to the south of the project site. Such exterior aviation noise levels are considered compatible ("normally acceptable") with schools per the California Governor's Office of Planning and Research's 2017 California General Plan Guidelines and Riverside County Airport Land Use Commission's compatibility criteria, as shown in Tables 3.11-5 and 3.11-6 of the EIR, respectively.
- FL-B.9 This comment raises concerns about the impact of the region's geographic shape in relation to adverse health conditions. The comment further states that regional warehousing is impacting the region's attempts to improve air quality. Section 3.2, Air Quality, of the EIR discusses the climate of the South Coast Air Basin and how it impacts the dispersion of pollutants and the existing air quality. Details on the improvement of air quality despite the continued growth of the region are provided in the Air Quality Technical Report (Appendix B-1). Specifically, Section 2.8 of the Air Quality Technical Report highlights the improvements of air quality with respect to ozone (O₃), PM₁₀ and PM_{2.5}, CO, and toxic air contaminants. Section 3.2, Air Quality, of the EIR discusses the 2022 SCAOMD Air Quality Management Plan and how it builds on measures already in place to control emissions and proposes new control strategies such as zero-emission technologies, low NO_x technologies, and other best management practices to reduce emissions and achieve federal O₃ standards. MM-AQ-4 through MM-AQ-6 include many of the strategies to help encourage cleaner vehicles and reduce stationary source emissions. The comment discusses the increase in warehouses in the Inland Empire and how they are impacting air quality and GHGs. SCAQMD has adopted Rule 2305, Warehouse Indirect Source Rule, to reduce NOx and diesel particulate matter emissions from warehouses greater than 100,000 square feet. See Section 3.2 for a full discussion of the Proposed Project's air quality impacts. The comment does not

raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.

FL-B.10 This comment raises concerns about DHL cargo operations in 2005–2008, which are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.9 As of 2024, there were fewer than 20 DC-9s still in service.10 Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.11 The Proposed Project is not related to past cargo operations and is separate from the 2005–2008 DHL cargo flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

 $^{^9 \}qquad \text{https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation} \\$

¹⁰ https://simpleflying.com/dc-9-operators-2024/

¹¹ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

II.3 Responses to Agency Comments

Comment Letter	Agency Name	Date	
A-1	Agua Caliente Band of Cahuilla Indians	May 30, 2024	
A-2 Riverside Transit Agency		May 31, 2024	
A-3	DTSC	June 26, 2024	
A-4	Riverside County Flood Control and Water Conservation District	July 3 and July 5, 2024	
A-5	CAL FIRE RCFD	July 9, 2024	
A-6	City of Moreno Valley	July 9, 2024	
A-7	Department of the Air Force Air Force Reserve Command	July 19, 2024	
A-8	City of Riverside	July 23, 2024	

Comment Letter A-1

Jeffrey Smith

From: THPO Consulting <ACBCI-THPO@aguacaliente.net>

Sent: Friday, June 21, 2024 4:54 PM

To: Jeffrey Smith

Subject: Meridian D1 Gateway Aviation Center Attachments: 05-009-2020-001ACBCI5_30_2024.pdf

Hello Jeffrey,

If you have any questions about the attached letter please feel free to contact me.

Thank you,

Claritsa Duarte
Cultural Resources Analyst
cduarte@aguacaliente.net
C: (760) 985-7538 | D: (760) 883-1134

5401 Dinah Shore Drive, Palm Springs, CA 92264

A-1.1

AGUA CALIENTE BAND OF CAHUILLA INDIANS

TRIBAL HISTORIC PRESERVATION



May 30, 2024

[VIA EMAIL TO:smith@marchjpa.com] March Joint Powers Authority (JPA) Jeffrey Smith 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

Re: Meridian Dl Gateway Aviation Center

Dear Jeffrey Smith,

The Agua Caliente Band of Cahuilla Indians (ACBCI) appreciates your efforts to include the Tribal Historic Preservation Office (THPO) in the Parcel D1-Gateway Aviation Center project. We have reviewed the documents and have the following comments:

*The presence of an approved Agua Caliente Native American Cultural Resource Monitor(s) during any ground disturbing activities (including archaeological testing and surveys). Should buried cultural deposits be encountered, the Monitor may request that destructive construction halt and the Monitor shall notify a Qualified Archaeologist (Secretary of the Interior's Standards and Guidelines) to investigate and, if necessary, prepare a mitigation plan for submission to the State Historic Preservation Officer and the Agua Caliente Tribal Historic Preservation Office.

- *Patricia Garcia made comments September 17, 2020 that were not included in the Draft EIR.
- * Ethnographic setting did not include Cahuilla background, the APE is within Cahuilla traditional use area and should be included in the ethnographic setting.

Again, the Agua Caliente appreciates your interest in our cultural heritage. If you have questions or require additional information, please call me at (760) 883-1134. You may also email me at ACBCI-THPO@aguacaliente.net.

Cordially,

When In Druck

Claritsa Duarte Cultural Resources Analyst Tribal Historic Preservation Office AGUA CALIENTE BAND OF CAHUILLA INDIANS

> 5401 DINAH SHORE DRIVE, PALM SPRINGS, CA 92264 760/699/6800 F 760/699/6824 WWW.AGUACALIENTE-NSN.GOV

ALIENTE-NSN.GOV

A-1.2 A-1.3 A-1.4 A-1.5 A-1.6

Response to Comment Letter A-1

Agua Caliente Band of Cahuilla Indians Claritsa Duarte May 30, 2024

- A-1.1 This comment is a transmittal email. Specific comments regarding the EIR are provided and responded to below.
- A-1.2 This comment is introductory in nature. Specific comments regarding the EIR are provided and responded to below.
- A-1.3 This comment requests the presence of an approved Agua Caliente Native American monitor with the authority to halt construction during any ground-disturbing activities. MM-CUL-1 (Archaeological Monitoring) requires the project applicant retain a qualified tribal monitor to monitor all initial ground-disturbing activities through an agreement with the tribe(s). The tribal monitor will have the authority to temporarily divert, redirect, or halt ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources. The Proposed Project will have a Cultural Resource Monitoring and Treatment Plan in place prior to the commencement of ground-disturbing activities.
- A-1.4 This comment questions the EIR's omission of comments made by Patricia Garcia on September 17, 2020. The referenced letter is part of the AB 52 consultation and is on file with MIPAA. Section 3.4, Cultural Resources, and Section 3.13, Tribal Cultural Resources, of the EIR reference the letter in relation to the AB 52 consultation process. The 2020 letter requested the following: a copy of the records search, a cultural resources inventory of the Project area by a qualified archaeologist, copies of any cultural resource documentation, and the presence of an approved Agua Caliente Native American Cultural Resource Monitor(s). As noted in Section 3.4.1, Existing Conditions, of the EIR, CRM TECH completed a CHRIS search at the Eastern Information Center for the APE and the surrounding area within a 1-mile radius on June 8, 2020 (Appendix E). This search included mapped prehistoric, historical, and built-environment resources and properties designated as California Historical Landmarks, Points of Historical Interest, or Riverside County Landmarks. Additional consulted sources included the NRHP, the CRHR, and the California Historical Resources Inventory. The results of the records search are described in detail in Section 3.4.1 of the EIR. Copies of the records search may be requested from MIPAA.

As discussed in Section 3.4 and Section 3.13 of the EIR, MIPAA has not identified any geographically defined TCRs as intersecting the project site, but TCRs have been defined in the broader region. In consideration of the broader landscape, MM-TCR-1 (Tribal Monitoring) is included as part of the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities. MM-CUL-1 provides for archaeological monitoring of all initial ground-disturbing activities. MM-TCR-3 (Discovery of Human Remains) provides protocol for dealing with inadvertent discovery of human remains, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training. Impacts would be less than significant with mitigation incorporated.

- A-1.5 This comment requests the inclusion of Cahuilla background in the ethnographic setting. As requested, the Final EIR includes the Cahuilla background in the ethnographic setting.
- A-1.6 This comment is conclusory in nature and does not raise any specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter A-2

Jeffrey Smith

From: Mauricio Alvarez <malvarez@riversidetransit.com>

Sent: Friday, May 31, 2024 7:50 AM

To: Jeffrey Smith

Subject: RE: Notice of Availability of a Draft EIR: Meridian D1 Gateway Aviation Center Project

Good Morning Jeffrey,

Thank you for including Riverside Transit Agency in the development review of the proposed Meridian DA Gateway Aviation Project. After reviewing the plans, there are no comments to submit for this particular project.

A-2.1

Thank you,

Mauricio Alvarez, MBA

Planning Analyst
Riverside Transit Agency
p. 951, 565, 5260 Lec malvare

p: 951.565.5260 | e: malvarez@riversidetransit.com Website | Facebook | Twitter | Instagram 1825 Third Street, Riverside, CA 92507

From: Jeffrey Smith <smith@marchjpa.com> Sent: Thursday, May 23, 2024 8:01 AM To: Jeffrey Smith <smith@marchjpa.com>

Subject: Notice of Availability of a Draft EIR: Meridian D1 Gateway Aviation Center Project

Good Morning:

Notice is Hereby Given that the March Joint Powers Authority has circulated a Draft Environmental Impact Report (EIR) for the Meridian D1 Gateway Aviation Center Project. This approximate 46-acre project site is generally located west of Heacock Street, adjacent to March Air Reserve Base, and southwest of the intersection of Heacock Street and Krameria Avenue, in unincorporated Riverside County, California. The Draft EIR and all the documents referenced in the Draft EIR are available for public review at the March Joint Powers Authority offices, located at 14205 Meridian Parkway, Suite 140, Riverside, CA 92518. Additionally, the Draft EIR can also be viewed on the March JPA website at:

https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

The Draft EIR is being circulated for review for a minimum 45-day review period, starting Thursday, May 23, 2024, and concluding on Tuesday, July 9, 2024. Comments on the Draft EIR must be received no later than Tuesday, July 9, 2024. A public hearing has not yet been scheduled for this item but will occur sometime after the close of the review period. For more information, please refer to the attached Notice of Availability.

Thank you.

1

Response to Comment Letter A-2

Riverside Transit Agency Mauricio Alvarez May 31, 2024

A-2.1 This comment states the Riverside Transit Agency has reviewed the EIR and has no comments. The comment does not raise any specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter A-3



Yana Garcia
Secretary for
Environmental Protection



Department of Toxic Substances Control

Meredith Williams, Ph.D., Director 8800 Cal Center Drive Sacramento, California 95826-3200



SENT VIA ELECTRONIC MAIL

June 26, 2024

Jeffrey M. Smith, AICP
Principal Planner
March Joint Powers Authority
14205 Meridian Parkway Suite 140
Riverside, CA 92518
smith@marchipa.com

RE: DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT DATED MAY 23, 2024 STATE CLEARINGHOUSE # 2021040012

Dear Jeffrey M. Smith,

The Department of Toxic Substances Control (DTSC) reviewed the Draft Environmental Impact Report (EIR) for the Meridian D-1 Gateway Aviation Center project (project). Meridian Park D-1, LLC is proposing to develop an Air Cargo Center Component and Off- Site Component located on approximately 46 acres. The Air Cargo Center Component would include the development of a gateway air freight cargo center, including taxi lane/taxiway and parking improvements, located in an approximately 34-acre site within March Inland Port Airport under the jurisdiction of March Joint Powers Authority. The gateway air freight cargo center includes the construction of an

A-3.1

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Jeffrey M. Smith, AICP June 26, 2024 Page 2

approximately 180,800-square-foot cargo building with 9 grade-level loading doors, 31 truck dock positions, and 37 trailer storage positions. The cargo building would contain approximately 9,000 square feet of office space.

The Off-Site Component would be constructed on approximately 12 acres and would include taxiway and taxi lane construction, widening, and realignment; storm-drain extensions; and a perimeter patrol road with security fencing within March Air Reserve Base.

As identified in the draft EIR, dated May 2024, the project is in proximity to <u>Site 7</u>, a former fire-training and burn site located within the <u>Former March Air Force Base</u>. Because future project activities may extend near or within these boundaries, DTSC has the following comments:

- 1. Further environmental investigation within the project boundaries may be warranted. The mediums of concern include soil and soil vapor, which are known to be impacted at Site 7. The contaminants of concern (COC's) include volatile organic compounds and perfluorooctane sulfonate. Due to these concerns, DTSC suggests further investigation of soil and soil vapor to ascertain there is no potential for vapor intrusion in future workspaces.
- Due to ongoing investigations and remedial activities at Site 7, future activities
 may extend near or within the project's boundaries. This could present
 various challenges requiring cooperation and coordination with DTSC and
 March Air Force Base.
- 3. DTSC recommends that all imported soil and fill material should be tested to assess any COC's meet screening levels as outlined in the <u>DTSC Preliminary Endangerment Assessment Guidance Manual</u>. Additionally, DTSC advises referencing the <u>DTSC Information Advisory Clean Imported Fill Material Fact Sheet</u> if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the

A-3.1 Cont.

A-3.2

A-3.3

A-3.4

Page 2 of 4 in Comment Letter A-3

Jeffrey M. Smith, AICP June 26, 2024 Page 3

origins of the soil or fill material or, if applicable, sampling be conducted to assess that imported soil and fill material are suitable for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting DTSC's Human and Ecological Risk Office (HERO) webpage.

4. DTSC recommends being aware of signs of contaminated soil, residual staining, or odors during the construction process and advises collecting appropriate samples for waste characterization and contacting DTSC if further assessment is necessary. DTSC recommends compliance with all applicable or relevant and appropriate environmental laws.

DTSC appreciates the opportunity to comment on the draft EIR for the Meridian D-1 Gateway Aviation Center project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via <a href="mailto:em

A-3.5 Cont.

A-3.6

A-3.7

A-3.8

Sincerely,

Dave Kereazis

Associate Environmental Planner

Dave Kereazis

HWMP - Permitting Division - CEQA Unit

Department of Toxic Substances Control

Dave.Kereazis@dtsc.ca.gov

Page 3 of 4 in Comment Letter A-3

Jeffrey M. Smith, AICP June 26, 2024 Page 4

cc: (via email)

Governor's Office of Planning and Research State Clearinghouse State.Clearinghouse@opr.ca.gov

Samantha Hout

Environmental Scientist

Site Mitigation and Restoration Program

Department of Toxic Substances Control

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Scott Wiley

Associate Governmental Program Analyst

HWMP - Permitting Division - CEQA Unit

Department of Toxic Substances Control

Scott.Wiley@dtsc.ca.gov

Page 4 of 4 in Comment Letter A-3

Response to Comment Letter A-3

DTSC Dave Kereazis June 26, 2024

- A-3.1 The comment is introductory in nature and provides a summary of the Proposed Project and its proximity to Site 7. The comment does not raise any specific issues, questions, or concerns related to the adequacy of the analysis in the EIR.
- A-3.2 This comment suggests further investigation of soil and soil vapor to ascertain there is no potential for vapor intrusion in future workspaces due to the presence of volatile organic compounds and perfluorooctane sulfonate. As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires the Proposed Project to have a Hazardous Materials Contingency Plan that addresses potential impacts to soil, soil vapor, and groundwater beneath the project site to ensure the health and safety of construction workers and future occupants of the industrial uses on the site. The plan will be submitted to DTSC for approval prior to ground-disturbing activities. Further, in response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project now includes a parcel map to subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11, Tentative Parcel Map, in the Final EIR). The western developable parcel will encompass the Air Cargo Component of the Proposed Project and exclude all of Site 7. The eastern constrained parcel, which fronts Heacock Street, will encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment. This revision does not constitute new information under CEOA and does not impact the environmental analysis in the EIR.
- A-3.3 This comment notes that future remedial activities at Site 7 may extend into the project site and cooperation and coordination with DTSC and March ARB will be required. Under the property's Environmental Restrictive Covenants, the Proposed Project operations cannot disrupt required remedial investigation, response actions, or oversight activities, should any be required on the property. As discussed in detail in Response A-3.2, above, the Proposed Project now includes a parcel map to subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11 in the Final EIR). The parcel map will have no physical effect on the environment. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR.
- A-3.4 This comment recommends all imported soil and fill material be tested to evaluate potential contamination per DTSC's Preliminary Endangerment Assessment Guidance Manual. The Proposed Project will follow all rules and regulations with regard to the importation of soil and fill material. As required by MM-HAZ-1, DTSC will review and approve the Proposed Project's Hazardous Materials Contingency Plan.
- A-3.5 This comment provides recommendations and advice regarding fill import. The Proposed Project will follow all rules and regulations with regard to the importation of soil and fill material. As required by MM-HAZ-1, DTSC will review and approve the Proposed Project's Hazardous Materials Contingency Plan.

- A-3.6 This comment recommends awareness of signs of contamination during construction, as well as waste characterization for disposal, as necessary. MM-HAZ-1 requires preparation of a Hazardous Materials Contingency Plan that addresses potential on-site contamination and must include procedures for assessment, characterization, handling, and transportation of potentially contaminated media.
- A-3.7 This comment recommends compliance with applicable or relevant and appropriate environmental laws. As discussed in Section 3.8 of the EIR, the Proposed Project will comply with all applicable environmental rules and regulations.
- A-3.8 This comment is conclusory in nature. The comment does not raise any specific issues, questions, or concerns related to the adequacy of the analysis in the EIR.

Comment Letter A-4

RCFC response - Meridian D1 Gateway Aviation Center Project-Due 7/9/2024

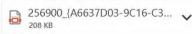
MA

McNeill, Amy < ammcneil@RIVCO.ORG >

To: Jeffrey Smith <smith@marchjpa.com>

Fri 7/5/2024 9:14 AM

Cc: Wheeler, Timothy <TWHEELER@RIVCO.ORG>; Hildebrand, John ·



Good afternoon, Jeffery,

Attached you will find a copy of Riverside County Flood Control's comments pertaining to the above-mentioned project.

Should you have any questions please feel free to contact us.

Thank you,





Amy McNeill, PE | Engineering Project Manager

Development Review

Riverside County Flood Control & Water Conservation District 1995 Market Street | Riverside, CA 92501 Direct: 951-955-1214 | Email: ammcneil@rivco.org

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County of Riverside California

JASON E. UHLEY General Manager-Chief Engineer



1995 MARKET STREET RIVERSIDE, CA 92501 951.955.1200 951.788.9965 FAX www.rcflood.org

RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

256900

July 3, 2024

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

Attention: Jeffrey Smith Re: Meridian D1 Gateway Aviation
Center Project, APN 294-170-010

The Riverside County Flood Control and Water Conservation District (District) does not normally recommend conditions for land divisions or other land use cases in incorporated cities. The District also does not plan check City land use cases, or provide State Division of Real Estate letters or other flood hazard reports for such cases. District comments/recommendations for such cases are normally limited to items of specific interest to the District including District Master Drainage Plan facilities, other regional flood control and drainage facilities which could be considered a logical component or extension of a master plan system, and District Area Drainage Plan fees (development mitigation fees). In addition, information of a general nature is provided.

The District's review is based on the above-referenced project transmittal, received May 24, 2024. The District has not reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

- This project would not be impacted by District Master Drainage Plan facilities, nor are other facilities of regional interest proposed.
- This project involves District proposed Master Drainage Plan facilities, namely, Perris Valley MDP Line C. The District will accept ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. All regulatory permits (and all documents pertaining thereto, e.g., Habitat Mitigation and Monitoring Plans, Conservation Plans/Easements) that are to be secured by the Applicant for both facility construction and maintenance shall be submitted to the District for review. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.
- This project proposes channels, storm drains larger than 36 inches in diameter, or other facilities that could be considered regional in nature and/or a logical extension a District's facility, the District would consider accepting ownership of such facilities on written request by the City. The Project Applicant shall enter into a cooperative agreement establishing the terms and conditions of inspection, operation, and maintenance with the District and any other maintenance partners. Facilities must be constructed to District standards, and District plan check and inspection will be required for District acceptance. Plan check, inspection, and administrative fees will be required. The regulatory permits' terms and conditions shall be approved by the District prior to improvement plan approval, map recordation, or finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

A-4.2

A-4.3

Page 2 of 3 in Comment Letter A-4

Marc Re:	h Joint Powers Authority Meridian D1 Gateway Aviation Center Project, APN 294-170-010	- 2 -	July 3, 2024 256900		
\boxtimes	This project is located within the limits of the District's Perris Valley Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.				
	right of way or facilities, namely,	. If a prop	ed activities occurring within District bosed storm drain connection exceeds gation will be required. For further 51.955.1266.		
	downstream property owners. Miti	gation will be required to offse	rates and could adversely impact the such impacts. Alternatively, if the ine C, increased runoff would not be	A-4.5	
	The District's previous comments ar	e still valid.			
This Wate	ERAL INFORMATION project may require a National Polluter Resources Control Board. Clearance March Joint Powers Authority has detent.	for grading, recordation, or other	er final approval should not be given	A-4.6	
Power appliand signadi	s project involves a Federal Emergency ers Authority on behalf of the Nationa cant to provide all studies, calculations, should further require that the applica- ng, recordation, or other final approv- pancy.	al Flood Insurance Program loc plans, and other information re to obtain a Conditional Letter of	cal administrator should require the quired to meet FEMA requirements, of Map Revision (CLOMR) prior to	A-4.7	
in the Declar docu	project proponent shall bear the response a California Environmental Quality Acaration, Environmental Impact Report) ment was prepared for the project. The all other federal, state, and local environments	t (CEQA) document (i.e., Negat and/or Mitigation Monitoring a e project proponent shall also b	ive Declaration, Mitigated Negative and Reporting Program, if a CEQA ear the responsibility for complying	A-4.8	
requi and a from Wate	natural watercourse or mapped floodpla re the applicant to obtain a Section 16 a Clean Water Act Section 404 Permit these agencies indicating the project is requality Certification may be required quance of the Corps 404 permit.	O2 Agreement from the Californ from the U.S. Army Corps of E s exempt from these requirement	nia Department of Fish and Wildlife Ingineers, or written correspondence Its. A Clean Water Act Section 401	A-4.9	
		Very truly yours,			
		amy Me Ne	ill		
		AMY MCNEILL Engineering Projec	t Manager		
ec:	Riverside County Planning Department Attn: Timothy Wheeler				

Page 3 of 3 in Comment Letter A-4

John Hildebrand Sarah Moore

EM:blj

Response to Comment Letter A-4

Riverside County Flood Control and Water Conservation District
Amy McNeill
July 3 and July 5, 2024

- **A-4.1** This comment is a transmittal email. Specific comments regarding the Proposed Project and EIR are addressed below.
- A-4.2 This comment provides an overview of Riverside County Flood Control's role in development entitlements. Specific comments regarding the Proposed Project and EIR are addressed below.
- A-4.3 This comment states that the Proposed Project involves District-proposed Master Drainage Plan facilities. However, as shown in the Proposed Project's Stormwater Infrastructure Plan, Figures 2-7a and 2-7b of the EIR, the Proposed Project does not propose any Master Drainage Plan facilities.
- A-4.4 This comment identifies that the project site is located within the limits of Riverside County Flood Control's Perris Valley Area Drainage Plan, for which drainage fees have been adopted. Per Riverside County Flood Control's request, applicable fees will be paid to Riverside County Flood Control prior to issuance of grading or building permits.
- A-4.5 This comment raises concerns that the Proposed Project could generate an increase in peak flows, impacting downstream property owners, but that if the Proposed Project were to discharge to Perris Valley Master Plan Line C, there would be no impact to downstream property owners. As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, the Proposed Project's underground detention systems are designed for a 100-year, 6-hour storm scenario and would result in a reduced 6-hour peak discharge rate. Therefore, downstream property owners would not be impacted. Further, project site stormwater runoff would discharge into Perris Valley Master Plan Line C (Appendix K-2). The comment does not raise any specific issues, questions, or concerns related to the adequacy of the analysis in the EIR.
- A-4.6 This comment states that the Proposed Project may require a NPDES permit from the SWRCB. As discussed in Section 3.9 in the EIR, the Proposed Project will comply with all applicable requirements related to the NPDES permits. Because the Proposed Project would involve ground disturbance in excess of 1.0 acre, a NPDES General Construction Permit would be obtained prior to development of the Proposed Project.
- A-4.7 The comment states that if a project is located within a FEMA mapped floodplain, then March JPA should require the project applicant to evaluate impacts to meet FEMA requirements, require that a Conditional Letter of Map Revision be obtained prior to issuance of a grading permit, and require that a Letter of Map Revision be obtained prior to occupancy. As discussed in Section 3.9 of the EIR, FEMA has determined that the project site is located within Zone D, per an updated Flood Insurance Rate Study that became effective August 28, 2008. Zone D areas are defined as having possible, but undetermined, flood hazards. A recent letter of map revision prepared by FEMA for areas along the Perris Valley Channel-Lateral A indicates that the areas located between the project site and the Perris Valley Channel-Lateral A are subject to a flood elevation of up to 1,486.4 feet NAVD 88 during a 100-year storm. The project site elevation ranges from approximately 1,490 to 1,495 feet NAVD 88.

Because the elevation of the site is greater than the flood elevation identified in the recent letter of map revision, the project site is located outside the 100-year flood zone for the Perris Valley Channel–Lateral A. There are no other areas of known flooding located near the project site.

- A-4.8 This comment states the project proponent must comply with all applicable mitigation measures defined in the EIR and/or MMRP, including but not limited to MM-HYD-1 (Water Quality BMPs), as well as all other federal, state, and local environmental rules and regulations. The EIR mitigation measures will be enforced through the MMRP—see Chapter IV of this Final EIR.
- A-4.9 The comment provides that in the event that a natural watercourse or mapped floodplain is impacted by the Proposed Project, March JPA should require the applicant to obtain a Section 1602 Agreement from CDFW, a Section 404 Permit from USACE, and Section 401 Water Quality Certification from RWQCB (prior to issuance of the Section 404 permit). Jurisdictional waters and wetlands are discussed in Section 3.3, Biological Resources, of the EIR. The Proposed Project anticipates permanent impacts to 0.35 acres (1,162 linear feet) of non-wetland waters of the United States and 0.10 acres of wetland waters of the United States under USACE jurisdiction, 0.34 acres of non-wetland waters of the state (1,130 linear feet) and 0.11 acres (22 linear feet) of wetland waters of the state under RWQCB jurisdiction, and 0.49 acres (1,162 linear feet) of vegetated streambed under CDFW jurisdiction, as shown in EIR Figure 3.3-6, Impacts to Aquatic Resources, USACE; Figure 3.3-7, Impacts to Aquatic Resources, RWQCB; and Figure 3.3-8, Impacts to Aquatic Resources, CDFW. MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting) requires mitigation through off-site reestablishment credits to ensure no net loss of habitat, reducing impacts to less than significant.

As discussed further in Section 3.9 of the EIR, erosion control measures would be implemented during construction as part of the SWPPP for the Proposed Project. Prior to the start of construction activities, the Contractor is required to file a Notice of Intent with the SWRCB to obtain coverage under the NPDES General Permit for Storm Water Discharges Associated with the Construction and Land Disturbance Activities (Order No 2009-009-DWQ, NPDES No. CASO00002) or the latest approved general permit. This permit is required for earthwork that would result in the disturbance of 1 acre or more of total land area, unless it is part of a larger plan of development. The required SWPPP will mandate the implementation of BMPs to reduce or eliminate construction-related pollutants in the runoff, including sediment. With the implementation of MM-BIO-5 and compliance with existing regulations, temporary indirect impacts to wetlands would be reduced to less than significant.

Comment Letter A-5

DRAFT EIR SCH No. 20210400012 - FPEIR240001

Owens, Olivia@CALFIRE<Olivia.Owens@fire.ca.gov>

To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/8/2024 3:26 PM

Cc: CALFIRE RVC Planning Submittals < RVCPlanningSubmittals@fire





Jeffrey,

Please see comments from Fire for The Meridian D1 Gateway Aviation Center Project. Let me know if you have any questions or concerns.

A-5.1

Respectfully,



Olivia Owens

Administrative Services Assistant

Office of the Fire Marshal/Fire Planning Division CAL FIRE/Riverside County Fire Department Desk: 951-955-0694 | Main: 951-955-4777 4080 Lemon St, 10th Floor, Riverside, CA 92501 olivia.owens@fire.ca.gov | www.rvcfire.org

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CAL FIRE - RIVERSIDE UNIT RIVERSIDE COUNTY FIRE DEPARTMENT

BILL WEISER - FIRE CHIEF Office of the County Fire Marshal 4080 Lemon Street. 10th Floor, Riverside, CA 92501 (951) 955-4777 www.rvcfire.org

PROUDLY SERVING THE UNINCORPORATED AREAS OF RIVERSIDE COUNTY AND THE CITIES OF:

BANNING

BEAUMONT

COACHELLA

DESERT HOT SPRINGS

EASTVALE

INDIAN WELLS

INDIO

JURUPA VALLEY

LAKE ELSINORE

LA QUINTA

MENIFEE

MORENO VALLEY

Norco

PALM DESERT

PERRIS

RANCHO MIRAGE

RUBIDOUX CSD

SAN JACINTO

TEMECULA

WILDOMAR

BOARD OF SUPERVISORS:

KEVIN JEFFRIES DISTRICT 1

KAREN SPIEGEL DISTRICT 2

CHARLES WASHINGTON

V. MANUEL PEREZ

DR. YXSTIAN GUTIERREZ DISTRICT 5 June 7, 2024

MJPA 14205 Meridian Parkway, Unit 140 March Air Reserve Base, CA. 92518 RECEIVED

JUL 0 8 2024 BY: ______

Re: Meridian D1 Gateway Aviation Center Draft EIR – 20210400012 - FPEIR2400011

The Fire Planning Division within the Riverside County Fire Department assesses proposed developments across the jurisdiction of the department's service areas. Our evaluation focuses on ensuring compliance with departmental standards, considering factors such as response times, existing fire station locations, equipment availability, and the anticipated impact on service requests resulting from these proposed developments.

The Riverside County Fire Department provides cooperated integrated regional fire protection services within the County of Riverside and partner cities. The three closest Riverside County Fire Department (and partner city) Fire Stations by response times are as follows:

- Fire Station 90 333 Placentia Ave. Perris, CA. it is approximately 4.14 minutes away.
- Fire Station 59 -21510 Pinewood St. Perris, CA. It is approximately 4.42 minutes away.
- Fire Station 91 16110 Lasselle St. Moreno Valley, CA. It is approximately 6.50 minutes away.

Below are the specific corrections imposed on this project submittal:

 Fire Services – The draft EIR reports (page 639 and any other referenced section) that there are no / less than significant impacts caused by this project to fire services. Please revise your report to reflect an impact to the calls for service for this project that affect the closest fire station. This project exceeds the response time and calls for service maximums. A-5.2

A-5.3

Page 2 of 3 in Comment Letter A-5

The closest Riverside County Fire Station exceeds the acceptable response travel time to all or a portion of the project. Specifically, it surpasses the 4-minute maximum response time required for this project. Although there is a mutual aid agreement with March AFB Fire, it is not used in determining primary fire services for new projects.

A-5.4

3. This project will increase the workload of the nearest fire station, which is currently operating at or above its optimal capacity. The fire station in question receives approximately 3,998 calls for service annually. Generally, a station can sustain a maximum of around 3000 calls for service per year.

A-5.5

The above-mentioned project impacts must be mitigated and approved by the fire department. Some additional requirements may be conditioned by Fire Planning to mitigate these impacts such as, allocating funds for a new station, remodeling or expanding existing fire stations, providing necessary fire response equipment, or additional funds through a Community Facilities District (CFD) or a similar funding mechanism (Prior to any map recordation). It is recommended these issues be further discussed with the fire department operations staff to ensure that all hazards are mitigated, and response needs are met.

A-5.6

Please reach out to rvcplanningsubmittals@fire.ca.gov to discuss these options.

If we can be of further assistance, please feel free to contact the Riverside County Fire Department, Office of the Fire Marshal, Fire Planning Division at (951) 955-4777 or revenuescape. revenuescape (951) 955-4777 or revenuescape.

Respectfully.

Kevin Shin

Deputy Fire Marshal Fire Planning Division

Page 3 of 3 in Comment Letter A-5

Response to Comment Letter A-5

CAL FIRE RCFD Kevin Shin July 9, 2024

- A-5.1 This is a transmittal email. Specific comments regarding the Proposed Project and EIR are addressed below.
- A-5.2 This comment describes RCFD's role in reviewing development projects and identifies the three closest RCFD (and partner city) fire stations by response time to the project site: Station 90, Station 59, and Station 91. The EIR and Initial Study (Appendix A-2) identified Station 65, Moreno Valley Station (15111 Indian Street), which is approximately 2 miles northeast of the project site, as the closest. RCFD's Fire Stations Map also identifies Station 65 as the closest fire station. The comment does not provide Station 65's response time. However, given that Station 65 is the closest station to the project site (refer to Table II.3-1 and Figure II.3-1), it would likely have a faster response time than Stations 91, 90, and 59. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Table II.3-1. RCFD Fire Stations

Station Name	Approximate Distance to Project Site
Station 65	2 miles
Station 91	3 miles
Station 90	5 miles
Station 59	6 miles

A-5.3 This comment raises concerns that the EIR does not accurately reflect the Proposed Project's impacts to response times from the closest fire station. As discussed in Response A-5.2, above, RCFD has identified different fire stations than the EIR and Initial Study as closest to the project site. The EIR presents the same information as was included in the Proposed Project's Initial Study (Appendix A-2), distributed for public review on March 31, 2021. RFCD provided a response on April 22, 2021 (Appendix A-3), stating that RFCD had no concerns with the information presented in the Initial Study and did not have further comment.

As discussed in Chapter 4, Other CEQA Considerations, and further supported in Appendix A-2 of the EIR, the Proposed Project would not result in substantial adverse impacts associated with the provision and/or need of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response ratios and response times.

As discussed in Chapter 4 of the EIR, operation of the Proposed Project would generate approximately 150 jobs, which it is assumed would be filled by the existing residential population from the greater Riverside County area. The associated land uses would be similar to those in the surrounding developments and would not be anticipated to require additional fire protection services beyond what

¹² RCFD (Riverside County Fire Department). 2021. "Fire Stations Map." https://www.rvcfire.org/resources/fire-stations-map.

is already provided. As such, the Proposed Project would not result in substantial population growth within RCFD's jurisdiction that would burden existing fire services, and impacts would be less than significant. Therefore, mitigation is not required.

The Proposed Project is subject to the payment of a DIF related to fire protection in accordance with Ordinance No. JPA 15-01. The payment of these fees would provide funding for capital improvements such as land and equipment purchases and fire station construction. The DIF amount is roughly proportional to the burdens and demands for fire services generated by the development of the Proposed Project.

Separate from RCFD's Mutual Aid Agreement with the March ARB Fire Department, pursuant to the Joint Use Agreement, March ARB will respond to fire and crash and rescue emergencies involving civil aircraft outside of hangars or other structures at the project site.

A-5.4 This comment states that the closest RCFD station exceeds the acceptable response time, which is identified as 4-minute maximum. As discussed in Response A-5.2, above, RCFD has identified different fire stations than the EIR and Initial Study (Appendix A-2) as closest to the project site. It is unclear what regulation RCFD could be referring to that would require a 4-minute maximum response time for the Proposed Project.

Policy 4.1 of the March JPA General Plan Safety/Risk Management Element states, "Ensure that law enforcement and fire services, such as fire equipment and response time, are adequate and able to response to a major disaster." NFPA Standard 1710 recommends "First Engine on Scene Time" of 4 minutes. However, under the 2009 RCFD Strategic Plan, NFPA Standard 1710 is to be considered a guideline, not a requirement. Further, as stated in the 2016 RCFD Operational, Standards of Cover, and Contract Fee Analysis Final Report: "With respect to the urban response time goal, it should be noted that very few fire departments in metropolitan areas meet the NFPA 1710 travel-time standard. In fact, most are several minutes above the standard, calling into question whether the standard is realistic for most departments. It may be helpful to think of NFPA 1710 as a desirable gold standard." The RCFD report recommends a 4.5-minute travel time for urban areas, even though such a goal is "still challenging." In recommending an alternative staffing model in 2017, RCFD identified a response time of 5 minutes or less for Heavy Urban land classifications. RCFD's identified closest fire station, Station 90, meets both of these response time goals.

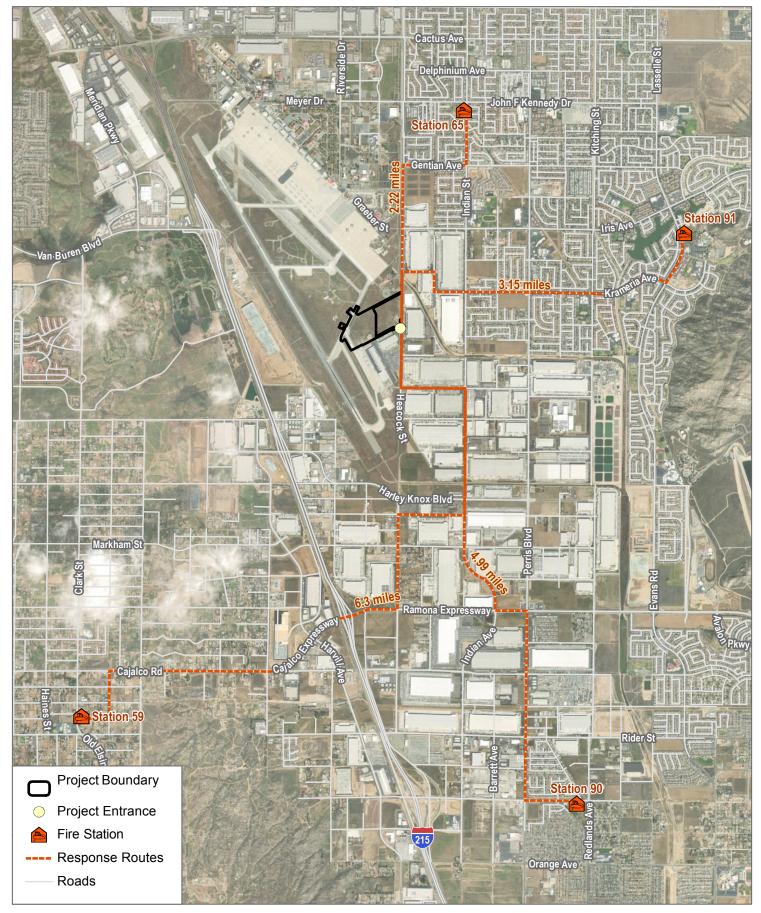
The comment further states that mutual aid stations, such as the March ARB fire station, are not included in determining primary fire services for new projects. As discussed in Response A-5.3, separate from RCFD's Mutual Aid Agreement with the March ARB Fire Department, pursuant to the Joint Use Agreement, March ARB will respond to fire and crash and rescue emergencies involving civil aircraft outside of hangars or other structures at the project site.

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.

RCFD. 2009. *Strategic Plan:* 2009–2019. November 2009. Accessed September 19, 2024. https://www.rvcfire.org/pdf/strategic-planning/StrategicPlan2009.pdf?v=2963.

RCFD. 2016. Operational, Standards of Cover, and Contract Fee Analysis. Final Report. March 2016. Accessed September 19, 2024. https://www.rvcfire.org/pdf/strategic-planning/Standards%20of%20Cover.pdf?v=420.

- A-5.5 This comment states the closest fire station is operating at or above its optimal capacity. As discussed in Response A-5.2, RCFD has identified different fire stations than the EIR and Initial Study as closest to the project site. The comment does not provide Station 65's operating capacity. As discussed in Chapter 4 of the EIR, the Proposed Project is subject to the payment of a DIF related to fire protection. The Proposed Project's DIF amount for fire protection facility fees is determined based on Ordinance No. JPA 15-01. The payment of these fees would provide funding for capital improvements such as land and equipment purchases and fire station construction. The DIF amount is roughly proportional to the burdens and demands for fire services generated by the development of the Proposed Project. Adhering to existing regulations is not considered mitigation under CEQA. As discussed in Chapter 4 and further supported in Appendix A-2 of the EIR, the Proposed Project's impacts to fire services would be less than significant and therefore do not require mitigation
- A-5.6 This comment requests that impacts regarding fire services be mitigated. As discussed in Chapter 4 of the EIR, the Proposed Project is subject to the payment of a DIF related to fire protection. The Proposed Project's DIF amount for fire protection facility fees is determined based on Ordinance No. JPA 15-01. The payment of these fees would provide funding for capital improvements such as land and equipment purchases and fire station construction. The DIF amount is roughly proportional to the burdens and demands for fire services generated by the development of the Proposed Project. Adhering to existing regulations is not considered mitigation under CEQA. As discussed in Chapter 4 and further supported in Appendix A-2 of the EIR, the Proposed Project's impacts to fire services would be less than significant and therefore do not require mitigation.

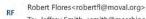


SOURCE: ESRI Imagery 2024; Riverside County 2024

DUDEK &

Figure II.3-1 Fire Station Response Routes

Comment Letter A-6



T.-- 7/0/2024 6:12 BM

To: Jeffrey Smith <smith@marchjpa.com>
Cc: Melissa Walker, P.E. <melissaw@moval.org>; Harold Zamora, P.E. <haroldz@moval.org>; seanke@moval.org

Tue 7/9/2024 6:13 PM

07.09.2024_Jeffrey M. Smith_... •

— 1 MB

Good afternoon Mr. Smith:

Please see the attached letter from the City of Moreno Valley for the Meridian D-1 Gateway Aviation Center Project Draft EIR.

If you have any questions, please feel free to contact me directly. Thank you.

A-6.1

Kind regards

Robert Flores
Planning Division Manager/Official
Community Development
City of Moreno Valley
p: 951.413.3214 | e: roberti@moval.org w: www.moval.org
14177 Frederick St., Moreno Valley, CA, 92553



From: Jeffrey Smith <smith@marchjpa.com>
Sent: Wednesday, July 3, 2024 1:45 PM
To: Jeffrey Smith <smith@marchjpa.com>

Subject: Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period

Warning: External Email - Watch for Email Red Flags!

Good Afternoon:

The March Joint Powers Authority (March JPA) has extended the comment period on the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012). The comment period will now end on Monday, July 22, 2024. As noted on the Notice of Availability, the Draft EIR is available for review at the March JPA's office or on the March JPA's webpage at:

• https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

For more information, please refer to the attached notice.

Thank you



Jeffrey M. Smith, AICP Principal Planner

March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
Phone: (951) 656-7000
Cell: (951) 807-7283
Fax: (951) 653-5558
Email: smith@marchipa.com
Web: www.marchipa.com

PLEASE VISIT <u>WWW.MARCHJPA.COM</u> OR CALL (951) 656-7000 FOR MORE INFORMATION. THANK YOU.



July 9, 2024

Community Development Department Planning Division

14177 Frederick Street P. O. Box 88005 Moreno Valley CA 92552-0805 Telephone: 951.413-3206

FAX: 951.413-3210

Jeffrey M. Smith, AICP Principal Planner March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

Subject: Public Review Comments for the Meridian D1 Gateway Aviation Center Project

Dear Mr. Smith:

The City of Moreno Valley (City) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Meridian D1 Gateway Aviation Center Project. The Proposed Project consists of an Air Cargo Center, located on approximately 46 acres, within the southeastern portion of the March Joint Powers Authority (March JPA) jurisdiction, within unincorporated Riverside County, California. The potential project is near the City of Moreno Valley; therefore, the City has a keen interest in the project to ensure it is successful without causing adverse impacts to the City of Moreno Valley.

In reviewing the DEIR and related studies and documents, we have the following comments for your consideration:

Aesthetics

- The Environmental Impact Report relies on the Initial Study prepared for the Project for the Aesthetics analysis to evaluate the aesthetic impacts. The aesthetics analysis considers a 14-foot-high decorative concrete tilt-up screen wall and enhanced landscaping, including Afghan pines, fronting Heacock Street, which is not a design feature incorporated within the project plans.
- A Line-of-Sight Plan must be prepared to assess the impacts to the quality of public views
 of the site and its surroundings, including visual impacts within the City of Moreno Valley's
 rights-of-way (Heacock Street), and should consider the City's General Plan Goals and
 Policies.
- 3. The owner shall submit to the City building, site wall, fencing, and landscape plans, and any proposed modifications, as the Proposed Project is highly visible along a major arterial (Heacock Street) within the City of Moreno Valley. It is important that the project is compatible with surrounding land uses and design along Heacock Street.

A-6.2

A-6.3

A-6.4

A-6.5

Page 1

Page 2 of 4 in Comment Letter A-6

Mr. Smith

May 17, 2022 4. Conceptual landscape plans must consist of a drought-tolerant planting pallet and use of the Moreno Valley specified street tree (Canary Island Pine - Pinus Canariensis) along the Heacock Street frontage. The City of Moreno Valley and the March Joint Powers Authority shall coordinate to ensure a unified streetscape on the landscape plan. 5. The Owner shall participate in any special district formed to pay exclusively for future installation and ongoing maintenance and installation of landscaping, bike paths, walking trails, or any other amenities along Heacock Street. **Hazardous Materials** 6. Construction of the southern access roadway and Heacock Street right-turn pocket requires excavation of Site 7 soils, which could release hazardous materials into the environment, according to the EIR analysis and assumptions. To ensure that impacts A-6.8 related to hazardous material releases or spills within the City of Moreno Valley are avoided or, at a minimum, minimized to less than significant, the City requests that the Hazardous Material Contingency Plan is reviewed in concurrency with the City of Moreno Valley. Transportation 7. Mitigation Measure TRA-2 (MM-TRA-2) requires all Proposed Project truck traffic utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. To further the effectiveness of the MM-TRA-2, the mitigation measure must require that Heacock Street punch through and connect with Harley Knox A-6.9 Boulevard, as part of the Proposed Project for this proposed route to function as planned. o Initial drive counts (to include vehicle classification) shall be provided to the City within one (1) year of occupancy and thereafter every three (3) years for up to ten (10) years from occupancy. 8. The owner shall be required to provide the following improvements for Heacock Street, since the main entrance and emergency access is taken from this road: o Full improvements along the project frontage of Heacock Street, including: A-6.10 Curb, side, and gutter; Landscaping and buffer (setback) areas; and Turn pockets into the Project site. 9. The owner shall pay a fair-share contribution for the pavement maintenance over a 30year cycle of the following roadway segments: Heacock Street, from project driveway to Cactus Avenue. Heacock Street, from project driveway to San Michele Road. o Cactus Ave, from Heacock Street to the westerly City-limits. A-6.11 Indian Street, from San Michele Road to the southerly City-limits. Perris Boulevard, from San Michele Road to the southerly City-limits. The Owner agrees to pay an aggregate amount for pavement maintenance up to a maximum of \$324,173.00.00, which shall be payable in annual installments equal to

Page 2

Page 3 of 4 in Comment Letter A-6

\$10,805.76.

Mr. Smith May 17, 2022

10. Prior to occupancy of the structures, a Traffic Management Plan shall be submitted to the March Joint Powers Authority (JPA) and the City of Moreno Valley to manage and identify potential hazards associated with the project within the City of Moreno Valley.

A-6.12

11. The owner shall provide the City with applicable plans as determined by the City Engineer for encroachments made within City right-of-way (including construction traffic access and controls) for review and approval.

A-6.13

A-6.14

- 12. The Owner shall agree to the following improvements:
 - Installation of a new traffic signal on Heacock Street, estimated at approximately \$600,000 to \$800,000;
 - Construct a northbound left turn lane with a minimum of 125-feet of storage, estimated at approximately \$200,000 to \$300,000 (design/right-of-way/construction);
 - Construct a southbound right turn lane with a minimum of 225-feet of storage, estimated at approximately \$200,000 to \$300,000 (design/right-of-way/construction);
 - Construct an eastbound left turn lane with a minimum of 100-feet of storage, a 2nd left turn lane, and a dedicated right turn lane, estimated at approximately \$200,000 to \$300,000 (design/right-of-way/construction); and
 - Other off-site improvements The project shall contribute approximately \$170,000 for these other improvements

In light of the potential significant and unavoidable impacts of the proposed project on the City of Moreno Valley and its residents, it is highly recommended that the Developer immediately engage in discussions with the City over incorporating a "community benefit" for the City of Moreno Valley, akin to an "overriding consideration" that the City could find outweighs the sum of the unavoidable adverse impacts of the proposed project on the City of Moreno Valley and its residents. This matter should be concluded with a written agreement approved and executed by the parties prior to any public hearings on the proposed project.

A-6.15

Thank you again for the opportunity to provide comments on the DEIR. We look forward to working with you as the document is being finalized and reviewing all environmental documents when complete. Should you have any questions or concerns, please contact me by phone at (951) 413-3206 or by email at RobertFL@MoVal.org.

Sincerely

Robert Flores

Planning Division Manager / Planning Official

Community Development City of Moreno Valley

CC.

Sean P. Kelleher, Assistant City Manager (Development) Melissa Walker, Public Works Director I City Engineer Michele Patterson, Economic Development Manager

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Page 4 of 4 in Comment Letter A-6

Response to Comment Letter A-6

City of Moreno Valley July 9, 2024

- A-6.1 This is a transmittal email. Specific comments, questions, or concerns about the Proposed Project and EIR are addressed below.
- A-6.2 This is a general introductory comment with a brief description of the Proposed Project and location.

 No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- A-6.3 This comment asserts the EIR's aesthetics analysis relied on the Initial Study, which included a 14-foot decorative concrete tilt-up screen wall and enhanced landscaping fronting Heacock Street as part of the Proposed Project. However, the development footprint of the Proposed Project was substantially reduced, eliminating Heacock Street frontage, after the release of the Initial Study (Appendix A-2 of the EIR). Primary access to the site would occur at a new signalized entrance onto Heacock Street (refer to Figure 2-5, Site Plan: Air Cargo Center Component, and Figure 2-10, Off-Site Development Plan, of the EIR). The EIR does not rely on the Initial Study's aesthetics analysis. Chapter 4, Other CEQA Considerations, of the EIR, analyzed scenic vistas and visual character/quality impacts of the current version of the Proposed Project and determined such impacts to be less than significant.
- A-6.4 This comment requests a Line-of-Sight Plan to assess the Proposed Project's visual impacts. As discussed in Chapter 2, Project Description, of the EIR, the project site is situated between existing logistics/warehouse to the northeast, east, and south so the Proposed Project would be visually compatible with the surrounding environment. As discussed in Chapter 4 of the EIR, based on the existing developed nature of the area, which supports numerous distribution and logistics warehouses that are comparable to or of greater bulk and scale than the proposed Air Cargo Center Component, as well as the prevalence of air navigation facilities associated with March ARB, implementation of the Proposed Project would not create substantial visual contrast in the context of the existing visual environment, and impacts to visual character and quality would be less than significant. As such, a Line-of-Sight Plan is not required to fully evaluate the Proposed Project's visual impacts.

This comment also requests that the analysis consider the City of Moreno Valley's General Plan Goals and Policies. However, the Proposed Project is located within the March JPA Planning Area and not the City. Evaluation of the Proposed Project's consistency with the applicable goals and policies of the March JPA General Plan is completed within Section 3.10, Land Use and Planning, of the EIR.

- A-6.5 This comment requests that the building, site wall, fencing, and landscaping plans be submitted to the City. The Proposed Project will be conditioned to ensure that it provides the requested plans to the City for the City's records; however, MIPAA has approval authority of the requested plans.
- A-6.6 This comment requests that the conceptual landscape plans identify drought-tolerant planting and use of the Moreno Valley specified street tree, the Canary Island Pine, along the Heacock Street frontage and that the City and MIPAA coordinate to ensure a unified streetscape on the landscape plan. As discussed in Response A-6.3, the development footprint of the Proposed Project was substantially reduced prior to publication of the EIR, eliminating the Heacock Street frontage. Figure 2-9, Landscape Plan, has been revised in the Final EIR to remove proposed vegetation. As shown in the revised figure,

landscaping will only include hardscape and soil binders. Hardscape along the Heacock Street extension will include decorative boulders, gravel, and decomposed granite. The eastern parcel of the Proposed Project, which fronts Heacock Street, is part of a superfund site known as Site FT007 or Site 7 and was a former fire training and disposal/burn pit area. Site 7 remediation efforts by March ARB are ongoing. As discussed in Chapter 2 of the EIR, one of the Proposed Project objectives is to avoid disturbance to Site 7. As such, Heacock Street cannot be widened further to accommodate the requested streetscape as it would disturb Site 7.

- A-6.7 This comment requests that the applicant participate in any special district formed to pay exclusively for future installation and ongoing maintenance and installation of landscaping, bike paths, walking trails, or any other amenities along Heacock Street. As discussed in Response A-6.3, the development footprint of the Proposed Project was substantially reduced prior to publication of the EIR, eliminating the Heacock Street frontage.
- A-6.8 This comment requests to review the Hazardous Material Contingency Plan. MM-HAZ-1 (Hazardous Materials Contingency Plan) requires the plan be reviewed and approved by MIPAA, EPA, DTSC, and the Santa Ana RWQCB. The Proposed Project will be conditioned to provide a copy of the plan to the City at the time of submittal to MIPAA.
- A-6.9 This comment requests the Proposed Project be conditioned to construct the Heacock Street extension to Harley Knox Boulevard. The proposed Heacock Street extension south of the existing terminus at Nandina Avenue to Harley Knox Boulevard is located within Clear Zone for March ARB Runway 14/32 (see Figure 5-2 of the March ARB 2018 AlCUZ Study). The Clear Zone "is required for all active runways and should remain undeveloped." This restriction is further implemented through Table MA-2 of the March ARB/MIP Airport ALUCP, which requires all existing open land to remain undeveloped. As requested by the City, the proposed Heacock Street extension south of the existing terminus at Nandina Avenue to Harley Knox Boulevard was included in the Joint Scoping Agreement (included as Appendix 1.1 in Appendix M-1, Traffic Analysis, of the EIR); however, it is not feasible to provide a new roadway extension along the Heacock Street alignment connecting to Harley Knox Boulevard within a potential crash zone. March ARB does not support the extension of Heacock Street to the south.

Project trucks would utilize existing designated truck routes to access Harley Knox Boulevard. As discussed in Section 3.12, Transportation, of the EIR, Heacock Street, San Michele Road, Indian Street, and Harley Knox Boulevard are designated truck routes (refer to EIR Appendix M-1.1, Traffic Analysis Report, Exhibits 3-14, 3-15, and 3-16). The March JPA truck routes are also provided in Figure 3.12-3, March JPA Truck Routes, in the EIR. The Traffic Analysis Report evaluated traffic conditions without and with the Heacock Street Extension. As such, there are analysis and findings that are made without the extension in place, and the extension was not required to support the Proposed Project.

The comment further requests drive counts to be provided to the City. In response to this comment, MM-TRA-2 (Project Truck Route on Heacock Street) has been revised in the Final EIR to incorporate the City's request for drive counts. Please see Chapter IV, MMRP, of this Final EIR for the revised language of MM-TRA-2.

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

March ARB. 2018. Air Installations Compatible Use Zones Study, March Air Reserve Base, Riverside, California. Final. February 2018. https://www.marchipa.com/documents/docs_forms/AICUZ_2018.pdf.

A-6.10 This comment requests full improvements along the Proposed Project frontage of Heacock Street, including curb, side, and gutter; landscaping and buffer (setback) areas; and turn pockets into the project site. Further, in response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project now includes a parcel map to split the D-1 property into two parcels subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11, Tentative Parcel Map, in the Final EIR). The western developable parcel will encompass the Air Cargo Component of the Proposed Project and exclude all of Site 7. The eastern constrained parcel, which fronts Heacock Street, will encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment and its addition does not change the analysis in the EIR.

As noted in Section 2.4.1.1, Air Cargo Center Improvement, of the EIR, the only improvement on the eastern parcel would be the access road in the south, which would widen an existing street that already connects to Heacock Street and avoids the environmentally sensitive burn pits. As discussed in Section 3.8, Hazards and Hazardous Materials, Section 3.8.1, Existing Conditions, of the EIR, in 2007, the property was transferred to March JPA using a quitclaim deed (provided in Appendix J-2, NETR Environmental Lien Report, of the EIR) with environmental restrictions in an associated Covenant to Restrict Use of Property, including prohibition of groundwater extraction and soil removal for non-remediation purposes. The Proposed Project includes construction of a 225-foot right-turn pocket into the existing access roadway along the southbound side of Heacock Street. Due to the deed restriction, Heacock Street (and the Proposed Project access) along the entire frontage of the eastern parcel boundary cannot be further widened.

- A-6.11 This comment requests the Proposed Project provide a fair-share contribution for pavement maintenance for specified roadways. PDF-TRA-1 has been revised in the Final EIR to reflect the City's request for the applicant to pay a fair-share contribution for the pavement maintenance over a 30-year cycle of the specified roadway segments. Although Project Design Features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the MMRP. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR for the revised language of PDF-TRA-1.
- A-6.12 This comment requests a traffic management plan be prepared and submitted to MIPAA and the City prior to occupancy. MM-TRA-2 has been revised in the Final EIR to indicate the preparation and submittal of a Traffic Management Plan. Please see Chapter IV of this Final EIR for the revised language of MM-TRA-2.
- A-6.13 This comment requests applicable plans be submitted to the City for City right-of-way encroachments. The Proposed Project will be conditioned to provide the engineering plans to the City Engineer for review and approval as it relates to improvements identifying encroachments within the City's right-of-way.
- A-6.14 This comment requested specified improvements and fair-share contribution for off-site improvements. The improvements described in this comment are already incorporated into the Proposed Project (see Appendix M-1.1, Exhibit 1-5, Site Adjacent Roadway and Site Access Recommendations, of the EIR). As provided in PDF-TRA-1, the Proposed Project's fair-share contribution for off-site improvements would be \$281,498, of which \$166,259 would be contributed to the City.

A-6.15 This comment requests that the applicant engage in discussions with the City over incorporating a community benefit for the City due to the identified significant and unavoidable noise/air quality impacts. As discussed in the EIR, the Proposed Project would result in significant and unavoidable operational air quality and aircraft noise impacts. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. This comment does not raise any comments, questions, or concerns about the adequacy of the environmental analysis of noise/air quality included in the EIR.

Comment Letter A-7

RE: Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period

MCDANIEL, JAMES R CIV USAF AFRC 452 MSG/CECP < james.mcdaniel.17@us.af.mil>

Fri 7/19/2024 5:04 PM

To:Jeffrey Smith <smith@marchjpa.com>;Dr. Grace Martin <martin@marchjpa.com> Cc:452 MSG/CC Workflow <452msg.ccworkflow@us.af.mil>;452 MSG/CC Workflow <452msg.ccworkflow@us.af.mil>

1 attachments (955 KB) 452d AMWCC DEIR Letter.pdf;

Mr. Smith,

On behalf of the 452d AMW March ARB, please find the attached (452d AMWCC Letter) comments for the Draft Environmental Impact Report (Draft EIR), Meridian D-1 Gateway Aviation Center Project.

The Base would like to remain up to date on EIR process and project developments and reserves the right to provide additional comment and/or concerns.

Please let us know if you have further questions.

I A-7.

V/r.

Rich McDaniel, Civ MSP/Community Planner/Instalation Planner/Programmer 452 MSG Base Civil Engineer Squadron 610 Meyer Dr. Bldg 2403 March ARB, CA 92518 DSN: 447-4862

Comm: 951-655-4862 Cell: 928-486-2485 MS Teams 452 MSG/CE

MS Teams March ARB KC-46A Pegasus

From: Jeffrey Smith <smith@marchjpa.com> Sent: Wednesday, July 3, 2024 1:45 PM To: Jeffrey Smith <smith@marchjpa.com>

Subject: [Non-DoD Source] Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment

Period

Good Afternoon:

The March Joint Powers Authority (March JPA) has extended the comment period on the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012). The comment period will now end on Monday, July 22, 2024. As noted on the Notice of Availability, the Draft EIR is available for review at the March JPA's office or on the March JPA's webpage at:

· https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

For more information, please refer to the attached notice.

Thank you.



Jeffrey M. Smith, AICP

Principal Planner

March Joint Powers Authority

14205 Meridian Parkway, Suite 140 Riverside, CA 92518

Phone: (951) 656-7000
Cell: (951) 807-7283
Fax: (951) 653-5558
Email: smith@marchipa.com
Web: www.marchipa.com

PLEASE VISIT <u>WWW.MARCHJPA.COM</u> OR CALL (951) 656-7000 FOR MORE INFORMATION. THANK YOU.

Page 2 of 9 in Comment Letter A-7



DEPARTMENT OF THE AIR FORCE AIR FORCE RESERVE COMMAND

19 July 2024

Colonel Bryan M. Bailey Commander 452 Air Mobility Wing 2145 Graeber Street March Air Reserve Base, CA 92518

Mr. Jeffrey Smith, Senior Planner, March Joint Powers Authority 1455 Meridian Parkway, Suite 140 Riverside, CA 92518

Dear Mr. Smith,

In response to the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012), March Air Reserve Base (MARB) wishes to express the following concerns regarding potential adverse impacts from the proposed project:

1. Requested Approvals and Entitlements: As per the DEIR, Section 2.6.1 (Requested Approvals and Entitlements), MARB is concerned with potential adverse impacts as related to the requested five work areas. Key concerns are listed as follows:

Encroachment of work areas on the Explosives Ordnance Disposal (EOD) range and
potential for life safety issues. Specifically, proposed Work Area 4 is heavily
encroached, and it is the Base's understanding that mitigation measures shall be vetted
with the project team during future project phases.

Expected periods of closure to Taxiway A. Requested Work Areas 2 – 5 shall result in
possibly significant periods whereupon proposed alterations to Taxiway A result in its
closure. How does the D-1 project team expect to overcome this such that Taxiway A,
a critical airfield infrastructure component for MARB mission sustainment, remain
operational?

Requested fence alterations in Work Area 1 could result in the temporary loss to portions
of the MARB installation perimeter/security fence. Does the D-1 project team have a
mitigation plan in place?

 Requested access easements for temporary construction and/or permanent maintenance in the proposed Work Areas could take up to 18 months to obtain from the Department of the Air Force (DAF).

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A-7.5

A-7.6

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2. Environmental and Utilities: MARB has conducted review of the D-1 DEIR document and maintains the following concerns with respect to potential adverse impacts on the Installation's environment and utility infrastructure: A-7.9 • As per the DEIR, Section 3.2 (Air Quality), key concerns are listed as follows: DEIR Item MM-AQ-2 - From airfield operations perspective, MARB has concern regarding grading limitations on days with a high air quality index prolonging construction impacts on airfield operations. DEIR Item MM-AQ-3 - MARB is concerned about the use of reclaimed water for landscape around the building and measures to minimize additional water to the A-7.10 area. Base supports no turf and smart irrigation controllers recommendation but would also like the EIR to address the need for no trees or vegetation that would increase Bird Air Strike Hazard (BASH) potential. • As per the DEIR, Section 3.3 (Biological Resources), key concerns are listed as follows: DEIR Item MM-BIO-1A - Removing known Burrowing Owl habitat in the proposed A-7.11 D-1 project area has direct impacts. What mitigation measures are in place to avoid when affected species are identified in the project site and support areas? DEIR Item MM-BIO-2, #9 - MARB shall review and approve vegetation as to avoid invasive and non-desirable vegetation from taking hold and moving onto out lands A-7.12 as per the latest MARB unsigned Vegetation Management Plan, Installation Natural Resources Management Plan (INRMP) and Invasive Species Management Plan (ISMP). As per the DEIR, Section 3.4 (Cultural Resources), key concerns are listed as follows: The Juan Bautista de Anza National Historic trail passes through portions of the proposed D-1 project site but is not mentioned, nor is the historic use by MARB A-7.13 mentioned in the DEIR document. Does the D-1 project team have measures in place to mitigate potential construction activity and/or development encroachment on this Historic asset? As per the DEIR, Section 3.7 (Greenhouse Gas Emissions), key concerns are listed as follows: This section does not state planned measures to mitigate certain increases to A-7.14 greenhouse gas emission levels resulting from the proposed increase in both air cargo aircraft and flight operations associated with the D-1 project. • As per the DEIR, Section 3.8 (Hazards and Hazardous Materials), key concerns are listed as follows: The D-1 DEIR document seems to only address mitigation plans for hazardous A-7.15 materials management. However, it is likely (if not certain) that existing groundwater and soils contain Per- and Polyfluoroalkyl Substances (PFAS) contamination. As such, what are the mitigation plans for hazardous PFAS, as well

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follows:

as other potentially hazardous waste disposal?

As per the DEIR, Section 3.13 (Tribal Cultural Resources), key concerns are listed as

Several tribes have claimed nearby Traditional Cultural Landscape, which therefore could be encroached by both the proposed on and off-site areas of the D-1 project site. As such, what mitigation measures are in place to manage this issue and assure collaboration with affected Tribal councils?

The following additional concerns were noted in a previous Air Force comment letter, submitted in September 2020 and on behalf of the 452 Air Mobility Wing (AMW) and MARB. Those concerns remain valid as they pertain to the D-1 DEIR document.

- Drainage from the proposed site will flow into the recently improved Heacock channel, which also functions as the primary eastbound outflow for MARB.
- Proposed on-site bio-retention facilities as well as increased daily civilian air cargo flight activity also elevates the Bird Air Strike Hazard (BASH) concern and potential adverse cumulative impacts for MARB operations.
- With the recent completion of a Master Plan for the March Inland Port Airport (MIPA), MARB also maintains a heightened level of concern with regard to the potential cumulative environmental impacts of additional planned development, such as the increased surrounding distribution warehouse facilities footprint.
- 3. Airfield Operations: MARB understands the latest amended Joint Use Agreement (JUA) permits March Joint Powers Authority (JPA) / March Inland Port Airport Authority (MIPAA) an annual maximum 21,000 aircraft movements (total arrivals and departures). However, as per the D-1 DEIR and proposed project scope, requested increases to 17 average daily flights (up to 22 daily flights during peak holiday periods) between 0500 2300 hours is considered just cause for the following operational concerns:
 - If the D-1 project is approved, tangible and enforceable mitigation measures would need to be in place during the construction phasing to ensure minimal/no impact to mission aircraft and their accessibility to critical airfield infrastructure (e.g; Taxiway A).
 - Quiet Hours, per the 2018 AICUZ, March ARB has experienced with its neighbors over the years. As a partner in the process, we have attempted to minimize noise disturbances through such actions as minimizing night flying, avoiding flights over heavily populated areas, reducing night maintenance activities and enforcing requested quiet hours between 11pm and 7am. March ARB request for mitigation measures adapt the same rules.
 - Potential workload and safety impacts could be magnified upon MARB Air Traffic Control (ATC) staffing resources commensurate with proposed air traffic increases.
 Further, how would this impede critical 452 AMW readiness, training, and ALERT mission requirements, given that MARB continues to function as a single-runway airfield?
 - As ultimately the D-1 DEIR does not recommend the proposed Gateway Aviation Air Cargo Terminal expansion as the preferred alternative, it instead selects Alternative 4 (expansion to private aircraft services and facilities) as the preferred path forward. As such, MARB is unclear as to next steps for the D-1 project. Could the scope of proposed development shift from air cargo facilities to private aircraft facilities expansion?

A-7.16 Cont

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- 4. Safety and Security: The 452 Security Forces Squadron (SFS), Civil Engineering Squadron (CES), and Fire Chief (CEF) have concerns regarding potential encroachment resulting from the proposed Gateway project as it concerns the following:
 - Concerns regarding line-of-sight obstructions, particularly in SFS' ability to see outside
 the fence in a southerly direction from MARB. The proposed Gateway Aviation Center
 facility would create further visual obstruction.
 - As mentioned above with regard to the requested five Work Areas, portions of the proposed site are also located within the 2,000-foot Explosives Ordnance Disposal (EOD) cordon and thus presents further safety concerns.
 - More detail is needed as to proposed removal and construction of MARB perimeter security fence adjoining the proposed Gateway Aviation Center site.

Thank you in advance for the opportunity to work with March JPA in providing the above comments and concerns as they pertain to the proposed D-1 Gateway Aviation Center Project and DEIR document. Accordingly, it is MARB's understanding that some of these concerns have already been discussed with March JPA and the D-1 developer team and shall be collaborated upon to arrive at suitable mitigation measures during future project phases. As such, we anticipate providing further response commensurate with forthcoming, more detailed phases of the project and look forward to participating in future correspondence.

A-7.24 A-7.25 A-7.26

BAILEY,BRYAN,MARK 1 Digitally signed by BAILEY,BRYAN,MARK 1153210299 Date: 2024.07.19 15:54:39 -07'00' BRYAN M. BAILEY, Colonel, USAF Commander, 452 Air Mobility Wing

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DEPARTMENT OF THE AIR FORCE AIR FORCE RESERVE COMMAND 452D AIR MOBILITY WING

17 January 2025

Colonel Bryan M. Bailey Commander 452d Air Mobility Wing 2145 Graeber Street March Air Reserve Base, CA 92518

Dr. Grace Martin Chief Executive Officer March Joint Powers Authority 1455 Meridian Parkway, Suite 140 Riverside, CA 92518

Dear Dr. Martin

This letter responds to the following documents concerning the proposed Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012):

- A. March Joint Powers Authority (JPA) and project developer Response to Comments (RTC) submittal (issued 29 August 2024) as it pertains to the Project's Draft Environmental Impact Report (DEIR).
- B. March JPA Apron Reconstruction Project for March Inland Port Airport (MIPA), Final Design Drawings Set (issued 2024 October).

Bottom Line Up Front (BLUF): In general, I am satisfied with the latest RTCs (item A above) and the updated Apron Reconstruction Project scope for the MIPA (item B above). As future issues arise, I expect prior notice from March JPA and the D-1 project developer.

The following issues were addressed in the latest RTCs and the updated Apron Reconstruction Project scope for the MIPA:

- 1. Requested Approvals and Entitlements (as per the DEIR, Section 2.6.1, Requested Approvals and Entitlements):
 - Potential adverse operational impacts on use of the MARB Explosives Ordnance
 Disposal (EOD) range and encroachment of the proposed five temporary Work Areas
 (refer to the DEIR, Section 2.4.1.2, Off-Site Component): MARB personnel will provide
 the project developer with scheduled future EOD operational periods and other relevant
 data, to which the developer will adhere and temporarily cease construction activity as
 required.
 - Further discussion between MARB and the project developer is needed to distinguish
 the need for temporary and/or permanent access easements vice temporary airfield

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waivers to accommodate D-1 project construction activity. If permanent easements are deemed necessary to access and / or maintain the proposed Work Areas, the project developer understands this could take up to 24 months to obtain from the Department of Air Force.

2. Environmental and Utilities: Although I am satisfied with the latest RTCs issued by the project developer in August 2024, future discussions are likely as they concern the six Air Force (AF) Form 813 (Request for Environmental Impact Analysis) submittals and corresponding requests for a Categorical Exclusion (CATEX) finding. Although a CATEX finding may ultimately be feasible for certain projects, MARB Environmental personnel will determine the level of environmental analysis required and mitigations, if any, for those projects to proceed. Please note if the project does not qualify for a CATEX, higher order environmental analysis will be required.

AF Form 813 – Project Title	Scope of Work Description	
Taxiway A Transition to New Taxi-lane	Proposes a dedicated Taxi-lane J, originating at intersection with existing Taxiway A, to access the proposed D-1 air cargo terminal expansion.	
Taxiway G Improvements	Proposes widening 70,000 SF of existing Taxiway G and other pavement improvements (taxiway lighting, grading) to the Taxiway A intersection.	
Storm Drain Connection to MARB Infield Area	New connection would alleviate existing inverted apron structure that is causing drainage to flow back into the existing Taxiway A culvert. Constructs a new storm drain inlet apron, headwall, and manhole junction structure to tie the existing Taxiway A culvert to proposed 36-inch storm drainpipes that will extend to the proposed D-1 project parcel.	
Storm Drain Connection to MARB Infield Area & Headwall Construction		
Perimeter Force Protection Fencing	Developer to install new security fencing adjacent to the Parcel D-1 property boundary. The new fence that adjoins MARB and D-1 property boundaries will be built on existing MARB property.	
Perimeter Patrol Road	Developer to install a new 12-foot wide single lane perimeter patrol road on MARB property. Proposed siting of the road is approximately five feet north of existing Parcel D-1 and MARB property boundary.	

- 3. Airfield Operations: Based on the August 2024 RTCs issued by March JPA and the project developer, I understand that implementation of the proposed D-1 Gateway Aviation Center project will not result in any adverse impacts to MARB airfield operations. Specifically, the following potential operational issues were addressed:
 - March JPA and project developer have assured that no construction activity associated with the proposed project will require or result in temporary closure of Taxiway A.

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- Based on ongoing correspondence between MARB and March JPA, the project developer has updated final design drawings for the proposed Apron Reconstruction Project at March Inland Port Airport (MIPA) to depict a revised location for the temporary contractor stockpile, batch plant, and Portland Cement Concrete (PCC) crusher facilities. Design drawings submitted in October 2024 proposed this location in an area roughly adjacent to the Taxiway A and G intersection, which was subsequently deemed an environmental / air quality issue by MARB Environmental and Base Civil Engineering (BCE) personnel. Please submit design drawings depicting the revised site location (understood to be closer to Heacock Street) to the MARB BCE before proceeding to the next phase of this project.
- 4. Safety and Security: I am presently satisfied with the proposed siting and scope of work as they concern the proposed perimeter force protection fencing and perimeter patrol road in support of the proposed D-1 Gateway Aviation Center project. Although AF Form 813 submittals are still under environmental review for those projects, I understand they represent future airfield infrastructure improvements for the Base that will not require AF and / or Department of Defense (DoD) funding.

It is my understanding that March JPA and the D-1 Gateway Aviation Center project developer team will continue to collaborate with MARB personnel (e.g., BCE, the 452d Operations Group, and the 452d Security Forces Squadron) to address the issues outlined above, as well as other concerns as they may arise.

Thank you in advance for the opportunity to work with March JPA and the project developer to provide comments on the proposed D-1 Gateway Aviation Center project.

BAILEY.BRYAN.M BAILEY.BRYAN.MARK.11532102 99 99 12:025.01.23 11:06:52 -0800

BRYAN M. BAILEY, Colonel, USAF Commander, 452d Air Mobility Wing

cc: Mr. Jeffrey Smith, Senior Planner, March Joint Powers Authority

Page 9 of 9 in Comment Letter A-7

II.3 - RESPONSES TO AGENCY COMMENTS

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Response to Comment Letter A-7

Department of the Air Force Air Force Reserve Command Colonel Bryan M. Bailey Commander, 452 Air Mobility Wing July 19, 2024

As noted in the DAF letter dated January 17, 2025, the DAF is satisfied with the following responses to comments to the DAF letter dated July 19, 2024.

- A-7.1 This comment is a transmittal email. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- A-7.2 This comment states the March ARB would like to remain up to date on the EIR process and reserves the right to provide additional comments. The comment does not raise any specific comments or questions about the EIR.
- A-7.3 This comment states that the Base can be contacted for further questions. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- A-7.4 This comment is introductory in nature. Specific comments are addressed below.
- A-7.5 This comment expressed concerns regarding encroachment of work areas on the Explosive Ordnance Disposal (EOD) range. The Proposed Project will be conditioned to follow the procedures and guidelines provided by March ARB. As noted in the March ARB letter dated January 17, 2025, specifically Item 1, Requested Approvals and Entitlements, first bullet point, "MARB personnel will provide the project developer with scheduled future EOD operational periods and other relevant data, to which the developer will adhere and temporarily cease construction activity as required."
- A-7.6 This comment requests further information regarding proposed closures of Taxiway A. No closures of Taxiway A are anticipated. Construction work will be done on either side and connecting to Taxiway A. Any drainage work will be conducted by jack and boring under Taxiway A. The Proposed Project will be conditioned to coordinate with Base operations when any work is to be performed adjacent to Taxiway A. As noted in the March ARB letter dated January 17, 2025, specifically Item 3, Airfield Operations, first bullet point, "March JPA and the developer have assured that no construction activity associated with the Proposed Project will require or result in temporary closure of Taxiway A."
- A-7.7 This comment questions if there is a mitigation plan in place for the temporary loss of the March ARB installation perimeter/security fence. The existing fence will remain in place while the new fencing is installed. The Proposed Project will be conditioned to adhere to any security measures provided by the Base. As noted in the March ARB letter dated January 17, 2025, specifically Item 4, Safety and Security, DAF is "satisfied with the proposed siting and scope of work as they concern the proposed perimeter force protection fencing."
- A-7.8 This comment discusses the timeframe for obtaining access easements for temporary construction and/or permanent maintenance in the proposed Work Areas. The Proposed Project will be conditioned to revise the 813s pursuant to March ARB input and resubmit to March ARB for review. As noted in the

March ARB letter dated January 17, 2025, specifically Item 1, Requested Approvals and Entitlements, second bullet point, "Further discussion between MARB and the project developer is needed to distinguish the need for temporary and/or permanent access easements vice temporary airfield waivers to accommodate D-1 project construction activity. If permanent easements are deemed necessary to access and/or maintain the proposed Work Areas, the project developer understands this could take up to 24 months to obtain from the Department of Air Force." Additionally, as noted in Item 2, Environmental and Utilities, "future discussions are likely as they concern the six AF Form 813 submittals."

- A-7.9 This comment raises concerns regarding the potential prolonging of construction impacts on airfield operations due to grading limitations on days with a high air quality index. MM-AQ-2 (Construction Requirements) prohibits grading on days forecasted to have an AQI of 150 or above (Red [Unhealthy] under EPA criteria). The region experiences AQI 150 or above on an average of 34 days per year. Grading operations are anticipated to take 32 days. It is not anticipated that MM-AQ-2 will prolong construction impacts on airfield operations.
- A-7.10 This comment expresses concern regarding the use of reclaimed water for landscaping. The project description included in Chapter 2, Project Description, in the Final EIR has been revised to clarify that the Proposed Project will not have any landscaping—hardscaping only. No reclaimed water use is anticipated.
- A-7.11 This comment questions the mitigation measures applicable to reduce impacts to burrowing owl. If burrowing owls are present on site, the Proposed Project will comply with MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures) and MM-BIO-1B (Burrowing Owl Relocation and Mitigation Plan), which are drafted to comply with CDFW guidance.
- A-7.12 This comment requests that March ARB review and approve proposed vegetation to avoid invasive and non-desirable vegetation from taking hold. As discussed in Response A-7.10, above, the project description included in Chapter 2 in the Final EIR has been revised to clarify that the Proposed Project will incorporate hardscape only with no vegetation.
- A-7.13 This comment identifies the Juan Bautista de Anza National Historic Trail as passing through portions of the project site. According to BLM maps, the Juan Bautista de Anza National Historic Trail does not traverse the project site (see also Map OSRC-1, Regional Open Space and Trails, in the MoVal 2040 General Plan). The comment further requests the EIR discuss the historic use of the project site as part of the March Air Force Base. This discussion has been expanded in Section 3.4, Cultural Resources, of the Final EIR.
- A-7.14 This comment requests mitigation measures to address increases in GHG emissions due to the Proposed Project's flight operations. MIPAA does not have regulatory authority over aircraft emissions; FAA and EPA are the regulatory authorities. Aircraft emissions account for the vast majority of GHG (72%), VOC (90%), NO_x (90%), and CO (82%) emissions; however, there is no feasible mitigation to reduce these emissions because aircraft technology to control emissions has not been developed. Research is ongoing for controlling GHG, VOC, NO_x, and CO emissions and improving fuel efficiencies.
- A-7.15 This comment asks what the mitigation plans are for hazardous Per- and Polyfuoroalkyl Substances and other hazardous waste disposal. The Proposed Project will be conditioned to follow Department of

Defense standards for removal or encapsulation of soils. MM-HAZ-1 (Hazardous Materials Contingency Plan) has been revised to clarify that the applicant shall provide the plan to the Base for review prior to start of grading. Although not expected to occur, MM-HAZ-2 (Stop Work, Groundwater Management) addresses contact with groundwater. Please see Chapter IV, MMRP, of this Final EIR for the revised language of MM-HAZ-1.

- A-7.16 This comment states several tribes have claimed nearby traditional cultural landscapes and requests mitigation measures to manage and assure collaboration with the affected tribes. The tribes participating in consultation have not raised this issue. Pursuant to MM-TCR-1 (Tribal Monitoring), tribal monitors will be present on site during grading operations.
- A-7.17 This comment questions the Proposed Project's drainage impacts to the Heacock channel. The Heacock channel is sized to accommodate drainage from the project site. As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, the Proposed Project drainage system will be designed to ensure stormwater discharge does not exceed the existing flow rate.
- A-7.18 This comment raises concerns that on-site bio retention facilities elevate the Bird Air Strike Hazard concern. All on-site retention will be underground so there will be no standing water on the project site.

 MM-HAZ-3 (Wildlife Protective Measures) requires incorporation of the recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) to reduce safety risks posed by wildlife to aircraft in flight.
- A-7.19 This comment expresses concern regarding cumulative environmental impacts. The Proposed Project is a stand-alone project and is not tied to any other development. The EIR analyzes cumulative impacts of this Proposed Project in conjunction with current, approved, and anticipated regional projects as required by CEQA. The Proposed Project does not propose expansion of the fix based operator-general aviation or commercial passenger operations. Any commercial passenger operations would require further environmental evaluation.
- A-7.20 This comment expresses that minimal/no impact from construction of the Proposed Project to mission aircraft would need to be ensured. As discussed in Response A-7.6, above, Proposed Project construction will not impact operations of Taxiway A. The applicant will coordinate with March ARB operations when any work is to be performed adjacent to Taxiway A. The Proposed Project will be conditioned to adhere to March ARB direction regarding construction in the vicinity of Taxiway A. As noted in the March ARB letter dated January 17, 2025, specifically Item 3, Airfield Operations, first bullet point, "March JPA and the developer have assured that no construction activity associated with the Proposed Project will require or result in temporary closure of Taxiway A."
- A-7.21 This comment discusses that March ARB has attempted to minimize noise disturbance during nighttime hours between 11:00 p.m. and 7:00 a.m. The Proposed Project does not propose any flights during quiet hours of between 11:00 p.m. and 7:00 a.m. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- A-7.22 This comment raises concerns regarding workload and safety impacts for March ARB air traffic control staffing resources. The Proposed Project will be conditioned to pay fair-share landing fees to fund additional Base air traffic control personnel in consultation with the Base.
- A-7.23 This comment questions the EIR's determination of Alternative 4 as the Environmentally Superior Alternative and questions if the proposed development would shift to a private aircraft facilities expansion. CEQA addresses project alternatives differently than NEPA does. In reviewing alternatives, CEQA requires the EIR to identify the Environmentally Superior Alternative but does not require the agency to approve that alternative. The applicant does not plan on shifting to private aircraft services.
- A-7.24 This comment expresses concern regarding line-of-sight obstruction, particularly SFS's ability to see southward outside the fence from March ARB. The Proposed Project will be conditioned to coordinate with SFS for the number and placements of cameras around the Proposed Project building and to provide SFS access to said camera feeds.
- A-7.25 This comment raises safety concerns related to the Work Areas and the EOD cordon. As discussed in Response A-7.5, above, the Proposed Project will be conditioned to follow the procedures and guidelines provided by the March ARB. As noted in the March ARB letter dated January 17, 2025, specifically Item 1, Requested Approvals and Entitlements, first bullet point, "MARB personnel will provide the project developer with scheduled future EOD operational periods and other relevant data, to which the developer will adhere and temporarily cease construction activity as required."
- A-7.26 This comment is in regard to the March ARB perimeter security fence. As discussed in Response A-7.7, above, the existing fence will remain in place while the new fencing is installed. The Proposed Project will be conditioned to adhere to any security measures provided by the March ARB. As noted in the March ARB letter dated January 17, 2025, specifically Item 4, Safety and Security, Colonel Bailey is "satisfied with the proposed siting and scope of work as they concern the proposed perimeter force protection fencing."
- A-7.27 This comment is conclusory in nature. Specific comments are addressed above.

Comment Letter A-8

RE: Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period

Taylor, Matthew <MTaylor@riversideca.gov>

Tue 7/23/2024 12:07 AM

To:Jeffrey Smith <smith@marchjpa.com>
Cc:Palafox, Daniel <DPalafox@riversideca.gov>;Tinio, Maribeth <MTinio@riversideca.gov>;Lilley, Jennifer
<JLilley@riversideca.gov>;Guzman, Rafael <RGuzman@riversideca.gov>

1 attachments (139 KB)

City of Riverside Comment Letter_NOA Meridian D1-Gateway.pdf;

Good evening Mr. Smith

Please find attached the City of Riverside's comments on the Draft EIR for the Meridian D-1 Gateway Aviation Center Project.

A-8.1

Please let us know if you have any questions or concerns. Thank you,

Matthew Taylor | Principal Planner

951.826.5944 | mtaylor@riversideca.gov

City of Riverside

Community & Economic Development Department Planning Division

3900 Main Street | 3rd Floor | Riverside 92522

From: Jeffrey Smith <smith@marchjpa.com>
Sent: Wednesday, July 3, 2024 1:45 PM
To: Jeffrey Smith <smith@marchjpa.com>

Subject: [EXTERNAL] Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period

CAUTION: This email originated from outside the City of Riverside. It was not sent by any City official or staff. Use caution when opening attachments or links.

Good Afternoon:

The March Joint Powers Authority (March JPA) has extended the comment period on the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012). The comment period will now end on Monday, July 22, 2024. As noted on the Notice of Availability, the Draft EIR is available for review at the March JPA's office or on the March JPA's webpage at:

https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

For more information, please refer to the attached notice.

Thank you.



Jeffrey M. Smith, AICP Principal Planner

March Joint Powers Authority
14205 Meridian Parkway, Suite 140
Riverside, CA 92518
Phone: (951) 656-7000
Cell: (951) 807-7283
Fax: (951) 653-5558
Email: smith@marchipa.com
Web: www.marchipa.com

PLEASE VISIT WWW.MARCHJPA.COM OR CALL (951) 656-7000 FOR MORE INFORMATION. THANK YOU.

Stay in-the-know with all things Riverside! Connect with us at RiversideCA.gov/Connect.

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City of Arts & Innovation

July 22, 2024

Jeffrey Smith, Principal Planner March Joint Powers Authority Planning Department 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

Subject:

City of Riverside's Review of a Notice of Availability and Draft Environmental Impact Report for the Meridian D1-Gateway Aviation Center Project

Dear Mr. Smith:

Thank you for the opportunity to comment on March Joint Powers Authority's Draft Environmental Impact Report (DEIR) for the Meridian D1-Gateway Aviation Center Project.

A-8.2

The City understands that the project consists of two development components: 1) An Air Cargo Center including the construction of an approximate 180,8000-square-foot cargo building with 9 grade-level loading doors, 31 truck dock positions, 37 trailer storage positions, and approximately 9,000 square feet of office space; and 2) An Off-Site Component including construction of features on land owned by March Airforce Reserve Base and work within the public right-of-way along Heacock Street. Operationally, the City understands that the Project would result in approximately 10,600 additional civilian flight operations annually, ranging from an average of 17 to 22 flights per day.

A-8.3

The City has reviewed the DEIR and wish to provide the following comments:

General Comment

The City of Riverside wishes to reiterate that it emphatically objects to any proposed flight operations for this or any other civilian aviation use between the hours of 10:00 PM and 7:00 AM. The City entreats the Authority to impose conditions of approval, ground lease terms or any other available mechanism upon the Project applicant to restrict any future operator from receiving or dispatching cargo flights during these nighttime hours. Doing so will have the added co-benefit of potentially reducing a host of environmental impacts identified in the Draft EIR to less-than significant levels. The City of Riverside sincerely appreciates the Joint Powers Authority's consideration of this significant concern.

A-8.4

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Community and Economic Development Department – Planning Division:

Chapter ES: Executive Summary

- Table ES-2 Comparison of Impacts from the Proposed Project and Alternatives.
 - Alternative 3 is a completely viable project alternative. See additional comments on Chapter 5 - Alternatives.

A-8.5

Chapter 2: Project Description

- Section 2.4.2 Project Operations
 - o Table 2.1 Proposed Aircraft Operations
 - How many annual civilian operations currently, what is the total anticipated number of civilian operations with fully operational project? In the interest of transparency and usability of the Draft EIR as a disclosure document, it should be plainly stated what the current number of aircraft operations are, and what the proposed number of aircraft operations will be with implementation of the Project plus reasonably foreseeable cumulative projects.

A-8.6

- o Page 2-6
 - Project plans depict an apron sized for larger aircraft. If larger aircraft could potentially be accommodated by the Project, the Draft EIR must evaluate potential impacts associated with those larger aircraft models, including but not limited to air quality, GHG emissions, and noise impacts.

A-8.7

A-8.8

- o Page 2-7
 - What are the proposed hours of operation of the cargo building?
- o Figure 2-5 Site Plan: Air Cargo Center Component
 - This figure and associated Project plans generate a major concern that the site plan depicts at least one aircraft loading apron sized for larger cargo aircraft than the EIR assumes will be used for the project. Based on scale dimensions and the number of engines depicted in the site plan, the footprint of this aircraft appears to be consistent with a Boeing 747-400/400ER Freighter or similar. Project description says the EIR assumes that the fleet would consist of smaller 767-300 models. Either the air quality, GHG emissions, health impact and noise modeling and air traffic pattern overflight simulations need to be re-run to reflect the potential use of larger, heavier aircraft or the project plans and descriptions should not depict any larger aircraft that could potentially have access to the facility at all.

A-8.9

- o Figure 2-6 Cargo Building Elevations
 - This elevation does not match the site plan. This elevation shows +/-42 dock doors, project description and site plans reflect 31.

A-8.10

Chapter 3: Environmental Analysis

- Page 3-3 Cumulative Projects
 - This could also have Land Use and Population & Housing impacts if the additional aviation operations create new or intensified hazards or increased or changed noise impacts that exceed those anticipated by the 2014 MARB LUCP, and thereby necessitate reassessment of land use compatibility zones that

A-8.11

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	0	impact more areas with additional development restrictions. The EIR must be revised to address this directly. Noise impacts will affect more than just the area immediately surrounding the	A-8.11 Cont.
		Project site as aircraft overflight noise impacts have the potential to affect a substantially larger area than just those immediately adjacent to runways and takeoff/landing zones. Cumulative analyses for noise, land use, population and housing need to address this, in particular air traffic patterns that involve aircraft overflights of residential areas and other sensitive receptors within the City of Riverside to the west.	A-8.12
•	Section	on 3.2 – Air Quality	-
	0	3.2.3 - Thresholds of Significance	
		Page 3.2-28 - See previous comments about aircraft model. Either the largest, most heavily emitting aircraft that the facility could reasonably be expected to accommodate should be used for model assumptions or the project should specifically be bound to use only the aircraft models evaluated or equivalent. In the latter case, only that type of aircraft should be shown in project plans.	A-8.13
		Page 3.2-29 – Operational Impacts – Why is limiting the number of flight operations to below the number that would generate significant emissions impacts infeasible as mitigation?	A-8.14
		Page 3.2-37 – "There is no feasible mitigation to reduce these emissions" - This is unsubstantiated. The project could limit the number of daily flight operations to the number of flights that would generate emissions within the thresholds of significance. If this is not feasible then the EIR needs to explain why.	A-8.15
	Section	on 3.5 – Energy	1
	0	Page 3.5-17 - Why or by what measure would the quantity of fuel usage	T
		estimated for project operations not be considered wasteful or unnecessary? How does this support the conclusion that there is a less than significant impact under this threshold?	A-8.16
•	Section	on 3.7 – Greenhouse Gas Emissions	
	0	aircraft, appearing to represent a Boeing 747-400 Freighter or equivalent; either the analysis must address the use of larger, higher-emitting aircraft or the project description must expressly exclude their use (to be enforced through Conditions	A-8.17
		of Approval or other adequate mechanism).	1
	0		_
		RTP-SCS Measure "Reduce greenhouse gas emissions and improve air quality" - The project will result in substantial new operational sources of greenhouse gas emissions (specifically, cargo planes) and, by its own admission through this Draft EIR, result in significant and unavoidable air quality impacts. The Project is therefore plainly inconsistent with this measure. The conclusion that the Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of green house gases is not supported by evidence	A-8.18
		and is unsubstantiated	

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and is unsubstantiated.

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The EIR needs to explain why the Project's inability to reduce GHG emissions from aircraft operations is not in and of itself a significant impact to GHG emissions under either threshold, particularly as it relates to inconsistency with GHG reduction measures within the 2020 RTP-SCS, and especially when this could be achieved by simply reducing the number of proposed annual flight operations.

• Section 3.8 – Hazards and Hazardous Materials

- Page 3.8-28 Threshold HAZ-2, Operation: The project involves the operation of cargo flights which, although rare, always carry the potential to release hazardous materials into the environment due to accidents. The EIR must be revised to address the potential for the project to create significant impacts under this threshold due to aviation accidents.
- Page 3.8-31 Threshold HAZ-4, Operation: The EIR analysis does not fully address the threshold of significance, which requires the analysis to evaluate whether the Project will "result in a safety hazard or excessive noise for people residing or working in the project area" (emphasis added). The analysis must address whether the addition of 10,600 annual flight operations will expose residents within the project area to excessive noise or safety hazards. This should reasonably include aircraft overflight of established residential neighborhoods within the City of Riverside based on typical arrival and departure flight tracks for the type and size of aircraft proposed to be used by future project users. Potential impacts must be fully assessed and available mitigation or avoidance measures must be identified and applied including, but not limited to, reduction of the number, frequency or timing of flight operations.

Section 3.10: Land Use & Planning

- Page 3.10-49 Aircraft Noise Compatibility: The EIR must evaluate whether operations associated with the project will have potential land use compatibility impacts that may result in inconsistency with the ALUCP and consistent local General Plans. Increased aircraft noise exposure throughout the Project area, including aircraft flight tracks that fly over portions of the City of Riverside to the West, could potentially exceed CNEL noise contours established by the 2018 AICUZ. A change in CNEL noise contours, particularly exposure to over 60 dBA CNEL, could alter compatibility considerations for overflight areas within the City of Riverside that may result in more stringent compatibility-based land use restrictions, particularly with respect to allowable residential density, which could also have potential impacts under thresholds of significance for Population & Housing. These potential impacts must be fully evaluated and mitigated by the EIR.
- Section 3.10.7 Cumulative Effects: Unintended land use impacts could also be realized if project operations (specifically increased aircraft overflight of established residential areas) cause the 60 dBA CNEL contours to change, which could affect ALUCP compatibility considerations for more land area within the City and County of Riverside, necessitating amendments to the LUCP that further restrict land uses and residential densities in surrounding jurisdictions. This could also potentially have impacts under thresholds of significance for Population & Housing by negatively affecting those jurisdictions' ability to plan for and

A-8.19 A-8.20 A-8.21 A-8.22 A-8.23

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accommodate their share of the Regional Housing Needs Assessment (RHNA) Allocation for the 6th RHNA Cycle and potential subsequent cycles by rendering a greater quantity of land unsuitable for housing development due to LUCP compatibility considerations. The EIR must fully evaluate and, where feasible, mitigate this potential cumulative land use impact.

Section 3.11 – Noise

- Page 3.11-7 Existing Noise Conditions: Despite portions of the City of Riverside being located within the 60 dBA CNEL contour for aircraft overflight associated with MARB, no noise measurements were taken within these areas, so it is not reasonable to conclude that the EIR has adequately evaluated potential increased noise impacts in these areas. New measurements must be taken and the analysis must be revised accordingly.
- Page 3.11-15 City of Moreno Valley General Plan: The Project would directly result in increased aircraft overflight and associated noise impacts within the City of Riverside. The EIR must therefore assess consistency with the City of Riverside General Plan 2025 Noise Element as well as Title 7 (Noise) of the Riverside Municipal Code. This includes time-of-day interior and exterior noise level limits for sensitive land uses.
- Page 3.11-30 Aircraft Noise Receivers: The receivers described here and in both Noise-related Appendices L-1 and L-2 that were used to model potential noise impacts do not adequately account for any flight track pattern other than "point-emission sources colinear with the March ARB runways," particularly the flight track that flies directly over established residential neighborhoods within the City of Riverside to the west as shown in the General Approach/Departure Traffic Pattern Envelope of Exhibit MA-5 (Compatibility Factors Map) of the 2014 MARB LUCP. The analysis must include an evaluation of potential noise impacts within Zone C2 of the MARB LUCP, which specifically identifies areas within the general flight track patterns of the MARB where "single-event noise may be disruptive to noise-sensitive land use activities" and where residential land use intensities are significantly restricted by the MARB LUCP. The Noise Study and Sleep Disturbance Memos are therefore incomplete and should be revised along with the corresponding EIR analysis to fully evaluate potential noise impacts within the City of Riverside, including the measurement of ambient baseline noise levels, and identification of potentially significant impacts and any appropriate mitigation or avoidance measures must be included. Until this necessary additional analysis has been completed, the impact conclusions throughout this section of the EIR are necessarily inadequate, insufficient and incomplete. The Draft EIR must be revised and recirculated to include this critical information.
- Page 3.11-58 Threshold NOI-3: Mitigation Measure NOI-2 is insufficient to address the identified impact and improperly defers mitigation to later analysis. As a matter of fact, March JPA is entertaining a ground lease with the project proponent and as such retains every right to condition such an agreement on specific performance of the project proponent and any potential future operator including but not limited to aircraft fleet mix, hours of operation, number of flight operations daily or annually, or any other such restrictions as it

A-8.23 Cont. A-8.24 A-8.25

A-8.27

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may see fit to place on a lessee regardless of whether this is specifically undertaken to mitigate an environmental impact or for any other reason the MJPA may see fit. It is incumbent on the Authority to impose any and all such mitigation measures and other conditions of a lease agreement in order to fully and adequately reduce potential environmental and community impacts of the proposed to development to an acceptable level.

A-8.27 Cont.

Chapter 5: Alternatives

• Section 5.4 - Alternatives under Consideration

- Alternative 2: Nighttime Flight Noise Reduction Alternative There is no legitimate reason what Alternatives 2 and 3 could not be considered as a single alternative (fewer flight operations with no nighttime flights). The EIR must address why this potential alternative that combines both a reduction in annual flight operations that would be sufficient to reduce Air Quality and GHG Emissions impacts to less-than-significant levels in addition to operational restrictions that would reduce Noise impacts to less-than-significant levels was not considered and evaluated as a viable project alternative that is consistent with all Project objectives.
- Alternative 3: Reduced Flight Operations Alternative What is the basis of this alternative evaluating a 10% reduction of annual flight operations? Again, it may be possible to reduce the proposed number of annual flight operations to a number that would not result in significant and unavoidable air quality and GHG emissions impacts, which may or may not equate to 10% of the number of operations proposed with the Project; the EIR must provide a sufficient rationale as to why another alternative was not considered.

A-8.29

A-8.28

The City of Riverside appreciates your consideration of the comments provided in this letter. Should you have any questions regarding this letter, please contact me at (951) 826-5944, or by e-mail at mtaylor@riversideca.gov.

A-8.30

We thank you again for the opportunity to provide comments on this proposal and look forward to working with you in the future.

Matthew Taylor Principal Planner

CC:

Patricia Lock Dawson Mayor
Riverside City Council Members
Mike Futrell, City Manager
Rafael Guzman, Assistant City Manager
Jennifer A. Lilley, Community & Economic Development Director
Maribeth Tinio, City Planner
Phaedra Norton, City Attorney

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Response to Comment Letter A-8

City of Riverside Matthew Taylor July 23, 2024

- **A-8.1** This comment is a transmittal email. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- A-8.2 This comment is introductory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- A-8.3 This comment provides a brief summary of the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- A-8.4 This comment objects to flight operations between the hours of 10:00 p.m. and 7:00 a.m. In consideration of public input and as further discussed in Response A-8.28, below, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- A-8.5 This comment states that Alternative 3 is a viable alternative. The EIR does not state that Alternative 3 is not viable. As discussed in Chapter 5, Alternatives, of the EIR, "Alternative 3 would meet all project objectives, but to a lesser extent than the Proposed Project." In consideration of public input and as further discussed in Response A-8.28, below, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- A-8.6 This comment requests the current number of annual civilian flight operations, proposed flight operations, and flight operations from any reasonably foreseeable cumulative projects. Table 3.11-3, Annual Airfield Operations at March ARB, of the EIR provides existing military and civilian flight operations from the Draft KC-46A EIS. As noted in the table, there are 4,972 annual civilian operations. This table has been added to Chapter 2, Project Description, of the Final EIR. The Proposed Project would result in 10,608 annual operations. The current capacity of annual civilian air cargo operations under the Joint Use Agreement is approximately 21,000 flight operations (see Section 1[c] of the agreement). The total annual operations for the Proposed Project and existing aircraft would be 15,580 flight operations or approximately 75% of the operations authorized under the Joint Use Agreement. In consideration of public input and as further discussed in Response A-8.28, below, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% to 7,488 flight operations. The total annual operations for the Proposed Project and existing aircraft would be 12,460 flight operations or approximately 59% of the operations authorized under the Joint Use Agreement. As discussed in Section 3.11, Noise, of the EIR,

"at this time, apart from the Proposed Project, there are no other planned or proposed air cargo projects that would have the potential to increase aviation operations and the associated aircraft noise levels."

- A-8.7 This comment alleges that, because the Proposed Project plans depict an apron sized for larger aircraft, the EIR should have evaluated impacts from larger aircraft. As discussed in Chapter 2 of the EIR, parking aprons were sized to accommodate commercial cargo airplanes. Because there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. As a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by MIPAA for conformance with this EIR; non-conformance may require additional CEQA review. Draft EIR figures showing a larger aircraft than the Boeing 767-300 (i.e., Figure 2-5) were incorrect and have been updated in the Final EIR. These revisions do not constitute new information under CEQA and do not change the environmental analysis in the EIR. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that, absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval.
- A-8.8 This comment questions the proposed hours of operations of the cargo building. Because there is no proposed tenant at this time, the EIR analysis assumed the cargo building would operate 24 hours per day, 7 days per week.
- A-8.9 This comment raises concerns regarding the aircraft depicted in Figure 2-5, Site Plan: Air Cargo Center Component, in the Draft EIR. Because there is no proposed tenant at this time, the proposed flight operations scenarios analyzed in the Draft EIR reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. Figure 2-5 incorrectly depicted a larger aircraft and has been corrected in the Final EIR. This revision does not constitute new information under CEQA and does not change the environmental analysis in the EIR.
- A-8.10 This comment raises concerns regarding the number of dock doors shown in Figure 2-6, Cargo Building Elevations, in the Draft EIR. This figure has been updated in the Final EIR to reflect the correct number of dock doors (31) and also maximum height (45 feet) of the proposed cargo building as analyzed in the EIR. This revision does not constitute new information under CEQA and does not change the environmental analysis in the Final EIR.
- A-8.11 This comment states the EIR should analyze land use impacts if the Proposed Project operations would necessitate reassessment of the land use compatibility zones in the March ARB/Inland Port Airport ALUCP. Figure 3.11-9, ALUCP Compatibility Map, in the EIR is primarily based on the 2005 March ARB AICUZ (ALUCP, Section MA.1.1).¹⁷ As shown in Figure 4-3 of the 2018 March ARB AICUZ, the 2005 noise contours covered a wider area than the 2018 noise contours. Both the 2005 and 2018 AICUZ noise contours were developed assuming the Inland Port Airport was operating at its maximum capacity allowed under the Joint Use Agreement or 21,000 annual flight operations. The 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement), as well as 31,172

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¹⁷ March ARB. 2018. Air Installations Compatible Use Zones Study, March Air Reserve Base, Riverside, California. Final. February 2018. https://www.marchjpa.com/documents/docs_forms/AICUZ_2018.pdf.

additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904).

The total annual operations for the Proposed Project and existing aircraft would be 15,580 flight operations or approximately 75% of the operations authorized under the Joint Use Agreement. EIR Figures 3.11-11 and 3.11-12 depict existing plus non-peak Project flight operations and existing plus peak Project flight operations, respectively, and are well within the boundaries of the 2018 AICUZ noise contours (Draft EIR Figure 3.11-4). Therefore, the Proposed Project is not expected to create new or intensify existing hazards or noise impacts with respect to the March ARB/Inland Port Airport ALUCP compatibility designations and corresponding development restrictions. In consideration of public input and as further discussed in Response A-8.28, below, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately% to 7,488 flight operations. The total annual operations for the Proposed Project and existing aircraft would be 12,460 flight operations or approximately 59% of the operations authorized under the Joint Use Agreement. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

A-8.12 This comment states that the EIR did not adequately consider noise effects on the larger surrounding area, specifically residential areas within the City of Riverside, and cumulative impacts. Communities to the west of the project site, which would include Mission Grove, Orangecrest, Canyon Crest, and Woodcrest, may see aircraft flights and/or experience aviation traffic noise levels. As discussed in Section 3.11 of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3, Baseline Aircraft Operational Noise Levels, of the EIR, the residential neighborhoods within the City of Riverside are outside the existing 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based upon the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods within the City of Riverside. With regard to cumulative aircraft noise impacts, Section 3.11 of the EIR acknowledges that DAF approval of the KC-46A aircraft would lessen overall aircraft noise impacts but the Proposed Project's impacts would still be cumulatively considerable.

- A-8.13 This comment reiterates concerns regarding aircraft depicted on the Proposed Project site plan with regard to the EIR's air quality analysis and states the largest, most heavily emitting aircraft the facility could accommodate should be analyzed or the Proposed Project should be restricted. As discussed above in Response A-8.7, because there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. A condition of approval will require conformation with the assumptions made in the EIR. The figures depicting a larger aircraft have been corrected in the Final EIR.
- A-8.14 This comment questions why it would not be feasible to limit flight operations such that air quality impacts would be less than significant. CEQA Guidelines Section 15364 defines "feasible" as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. Not accounting for other Proposed Project emissions sources (mobile, area, energy, on-site equipment), flight operations would need to be reduced 91%, which represents a reduction in flight operations to allow approximately 3 flight operations a day to reduce emissions to be under the SCAQMD operational thresholds. Such an alternative would not meet the majority of the Proposed Project objectives.
- A-8.15 This comment questions the EIR's conclusion that there is no feasible mitigation to reduce emissions. Please refer to Response A-8.14, above.
- A-8.16 This comment questions how the quantity of fuel usage was determined to not be wasteful or unnecessary. Threshold ENG-1 asks if the Proposed Project would result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. There is no quantity of fuel usage that would be used as a threshold. A project such as the Proposed Project would include fuel demand for mobile sources and aircraft; however, the standard conditions and mitigation measures provide that the Proposed Project's operations would not result in a more inefficient, wasteful, or unnecessary consumption of energy resources than other similar development projects of this nature. As discussed in Section 3.5, Energy, of the EIR, compliance with increasingly stringent electricity, natural gas, and fuel efficiency standards combined with compliance with the California Building Code and CALGreen Code would ensure that operation of the Proposed Project would demand only the energy necessary and not be inefficient or wasteful; thus, the impact would be less than significant.
- A-8.17 This comment reiterates concerns regarding aircraft depicted on the Proposed Project site plan with regard to the EIR's GHG analysis and states the largest, most heavily emitting aircraft the facility could accommodate should be analyzed or the Proposed Project should be restricted. As discussed above in Response A-8.7, because there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. A condition of approval will require confirmation of the assumptions made in the EIR. The figures depicting a larger aircraft have been corrected in the Final EIR.
- A-8.18 This comment questions the EIR's conclusion that the Proposed Project would not conflict with an applicable GHG plan. As discussed in Connect SoCal 2022, the RTP/SCS goal of reducing GHG emissions and improving air quality is based on creating a more compact development pattern, combined with identified transportation network improvements and strategies to improve pedestrian and bicycle access, lower average trip lengths, and reduce VMT. As discussed in Section 3.7, Greenhouse Gas Emissions, of the EIR, the Proposed Project would comply with the policies set forth

in Connect SoCal and the March JPA General Plan by reducing vehicle trips and VMT, increasing the use of alternative fuel vehicles, and improving energy efficiency. The goal of reducing GHG emissions and improving air quality does not mean there is no increase in GHG emissions or criteria air pollutants, but that the Proposed Project is consistent with the strategy for reducing GHG emissions, which in turn has the co-benefit of improving air quality.

As discussed in Section 3.7 in the EIR, the Proposed Project would involve development of an employment-generating land use, similar to existing permitted land uses in the vicinity. Development of the Proposed Project would provide new job opportunities to residents in the region, improving the jobs/housing balance. The Proposed Project would reduce commutes to large urban centers such as Los Angeles or Orange County and reduce VMT associated with longer commutes. Further, the Proposed Project will implement MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6 (Additional Air Quality Tenant Requirements) and MM-GHG-1 (Installation of EV Charging Stations), which are discrete mitigation measures aimed at reducing criteria air pollutant and GHG emissions.

The Proposed Project would result in significant and unavoidable impacts to air quality because it would exceed the SCAQMD regional thresholds of significance. However, as discussed in Section 3.2, Air Quality, of the EIR, the Proposed Project is consistent with the growth assumptions in the 2022 AQMP. The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the time frames required under federal law. Growth projections from local general plans adopted by 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. Additionally, as discussed in the Air Quality Technical Report (Appendix B-1 of the EIR), the Proposed Project would be consistent with the RTP/SCS because it does not exceed growth projections in the RTP/SCS or the AQMP; thus, employment growth would not substantially add to traffic congestion.

As discussed above, the Proposed Project can have a significant and unavoidable impact with respect to one threshold and still be consistent with the goals and policies in place to measure compliance with the RTP/SCS. As discussed in Section 3.7, the Proposed Project would be consistent with the RTP/SCS because it supports those goals and policies for improving jobs to housing balance, reducing VMT, and incorporating new vehicle technologies. Accordingly, the conclusion of less-than-significant impact is supported by evidence and substantiated.

A-8.19 This comment questions the EIR's less-than-significant GHG impact conclusion due to the Proposed Project's inability to reduce GHG emissions from aircraft operations. Section 3.7 of the EIR discussed the applicable thresholds of significance for the Proposed Project. For Threshold GHG-1, in the absence of any adopted quantitative threshold, MIPAA, as the lead agency, has determined that the Proposed Project's GHG emissions would not have a significant effect on the environment if the Proposed Project is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions as evaluated in Threshold GHG-2.

For Threshold GHG-2, the Proposed Project was evaluated for the following:

 Consistency with AB 32/SB 32 through evaluating the Proposed Project's consistency and compliance with applicable statewide and local regulatory programs designed to reduce GHG emissions.

- Consistency with SB 375 based on the growth assumptions of SCAG's Connect SoCal. With regard
 to individual developments, strategies, and policies set forth in Connect SoCal, the Proposed
 Project EIR discusses consistency with the following three categories:
 - Reduction of vehicle trips and VMT
 - Increased use of alternative fuel vehicles
 - Improved energy efficiency

There was no established numerical threshold that was used to evaluate the Proposed Project's significance; as such, the inability to reduce the aircraft's GHG emissions is not relevant to the significance determination. The RTP/SCS does not include specific goals, policies, or measures related to aircraft. The RTP/SCS does discuss the Contingency Measure Plan developed by the SCAQMD to meet federal Clean Air Act standards and notes the Contingency Measure Plan highlights the critical need for federal regulatory actions and/or funding to address emission sources under federal jurisdiction including aircraft, ships, trains and out-of-state trucks to meet the air quality standard.

As noted in Section 3.2 of the EIR, aircraft technology to control emissions has not been developed, although research is ongoing for controlling VOC, NO_x, and CO emissions and improving fuel efficiencies. Section 3.2 also notes MIPAA does not have regulatory authority over aircraft emissions.

- A-8.20 This comment alleges the EIR should have analyzed the potential to release hazardous materials through aviation accidents. Airplane crashes are anomalies and rarely occur. However, given the Proposed Project's proximity to the March Inland Port Airport, the risk of airplane crashes remains. The Riverside County ALUC reviews projects to maximize consistency with airport land use plans for projects within close proximity to an active airstrip. It is beyond the scope of this Proposed Project and EIR to guarantee that airplane crashes will never occur again; however, the analysis within the EIR and the consistency with the airport land use plan would minimize potential impacts to the project site and surrounding communities in the event of a catastrophic event. Section 3.8. Hazards and Hazardous Materials, of the EIR adequately analyzed the Proposed Project's potential impacts related to safety hazards within an airport land use plan, as required by CEQA. Generally, the potential for plane crashes onto the project site is too speculative to predict in the environmental analysis. However, existing regulations and land use planning (i.e., ALUCPs) assist in providing parameters for such events. The project site is not located within the Accident Potential Zone of the March ARB/Inland Port Airport ALUCP. As such, required consistency with the ALUCP and subsequent ALUC review prior to Proposed Project approval provide regulatory compliance for safety risks within the vicinity of an airport. Moreover, the EIR's analysis demonstrates the Proposed Project would not exacerbate existing safety risk.
- A-8.21 This comment states the EIR did not adequately analyze whether the Proposed Project's flight operations would expose residential neighborhoods, including those within the City of Riverside, to excessive noise or safety hazards. As discussed in Response A-8.11, above, the Proposed Project is not expected to create new or intensify existing hazards or noise impacts with respect to the March ARB/Inland Port Airport ALUCP compatibility designations. As discussed in Response A-8.12, above, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods within the City of Riverside (Figures 3.11-11 [non-peak operations] and 3.11-12 [peak operations] of the EIR). As shown in Table 3.11-56, Aircraft Operation Noise-Level Summary, of the EIR, the highest noise increase for a sensitive receptor is only 1.8 dB. An increase or

decrease of 1 dB cannot be perceived except in carefully controlled laboratory experiments, a change of 3 dB is considered barely perceptible, and changes of 5 dB are considered readily perceptible. Therefore, the Proposed Project would not expose residential neighborhoods to excessive noise hazards.

Additionally, Figure 5-2 from the 2018 AICUZ shows Runway Clear (CZ) and Accident Potential 1 and 2 Zones (AP1, AP2) that are aligned with the March ARB/Inland Port Airport runways and are thus far from the City of Riverside communities west of the Proposed Project. Furthermore, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- A-8.22 This comment alleges the EIR did not adequately address potential inconsistencies with the ALUCP and local general plans because the Proposed Project could potentially exceed the 2018 AICUZ noise contours. As discussed in Response A-8.11, above, the Proposed Project's aircraft noise impacts, when combined with existing military and civilian flight operations, would be less than that shown in the 2018 AICUZ noise contours, which analyzed full civilian flight operations (21,000 flight operations identified in the Joint Use Agreement) and a noisier fleet mix. The Proposed Project would not alter compatibility considerations for overflight areas.
- A-8.23 This comment reiterates the concern that the Proposed Project would cause the 60 dBA CNEL contours to change and affect ALUCP compatibility considerations and the City's ability to accommodate its Regional Housing Needs Assessment share. As discussed in Response A-8.11, above, the March ARB/Inland Port Airport ALUCP compatibility map was primarily based on the 2005 AICUZ, which showed noise contours covering a larger area than either the 2018 AICUZ or the Proposed Project's impacts (Figures 3.11-11 [non-peak operations] and 3.11-12 [peak operations] of the EIR). The Proposed Project would not affect ALUCP compatibility considerations or the City's ability to accommodate its Regional Housing Needs Assessment share.
- A-8.24 This comment questions the lack of noise measurements in portions of the City of Riverside within the 60 dBA CNEL contour. The 2018 March ARB AICUZ noise contours map (Figure 3.11-4 of the EIR) does show the 60 dBA contour line curving west over portions of the City of Riverside. However, the 2018 AICUZ noise contours were developed assuming full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement) and a noisier aircraft mix. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods in the City of Riverside.
- A-8-25 This comment states the EIR must evaluate consistency with the City of Riverside's General Plan and noise ordinance because of noise impacts to the City of Riverside. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the City of Riverside.

- A-8.26 This comment alleges the EIR is required to evaluate potential noise impacts within Zone C2 of the March ARB/Inland Port Airport ALCUP. As discussed in Response A-8.11, above, the March ARB/Inland Port Airport ALUCP compatibility map was primarily based on the 2005 AICUZ, which showed noise contours covering a larger area than either the 2018 AICUZ or the Proposed Project's impacts (Figures 3.11-11 [non-peak operations] and 3.11-12 [peak operations] of the EIR). With regard to sleep disturbance, and as further discussed in Response A-8.28, below, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- A-8.27 This comment alleges MM-NOI-2 is improper mitigation deferral. Because there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. As a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by MIPAA for conformance with this EIR; non-conformance may require additional CEQA review as part of a discretionary action to revise the conditions of approval. Under CEQA Guidelines Section 15126.4(a)(1)(B), MM-NOI-2 clearly sets forth parameters to determine when (prior to issuance of a certificate of occupancy) and under what standards (the noise impacts identified and disclosed in the EIR) MIPAA will determine compliance with MM-NOI-2. If MM-NOI-2 cannot be satisfied, additional environmental review would be required. The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. As further discussed in Response A-8.28, below, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- A-8.28 This comment requests consideration of an alternative combining Alternatives 2 and 3. In response to public comments, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative. Under Alternative 6, annual flight operations would be reduced by approximately 30%, resulting in total annual operations of 7,488 flight operations. Additionally, under Alternative 6, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Thus, flight operations under Alternative 6 would occur only from 7:00 a.m. to 10:00 p.m. Operation of the air cargo center would be similarly reduced.

Alternative 6 reduces air quality impacts compared to the Proposed Project, but impacts remain significant and unavoidable. As discussed in Response A-8.14, above, flight operations would have to be reduced by 91% to reduce air quality impacts to less than significant. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with

mitigation incorporated (Appendix P of this Final EIR). For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

A-8.29 This comment questions why Alternative 3 reduces operations by 10% and requests consideration of an alternative reducing air quality impacts to less than significant. Under CEQA, an EIR must describe a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. Alternative 3 meets the Proposed Project objectives, while reducing air quality and noise impacts. As discussed in Response A-8.14, above, flight operations would have to be reduced by 91% to reduce air quality impacts to less than significant.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

A-8.30 This comment is conclusory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

II.3 - RESPONSES TO AGENCY COMMENTS

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II.4 Responses to Organization Comments

Comment Letter	Organization Name	Date
0-1	Inland Valley Alliance for Environmental Justice/Perris Parents for Clean Air	July 1, 2024
0-2	Mission Grove Neighborhood Alliance	July 22, 2024
0-3	Rural Association of Mead Valley	July 22, 2024
	Channel Law Group, LLP	
	Jamie Hall	

II.4 - RESPONSES TO ORGANIZATION COMMENTS

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Comment Letter 0-1

Public comment for Meridian d1 gateway aviation center draft EIR

Franco<inlandvalleyalliance@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 3:34 PM

Dear, Mr. Smith

My name is Franco Pacheco with Inland Valley Alliance for Environmental Justice, formally known as Perris Parents for Clean air. We are providing comments regarding this proposed project and its massive negative effects it will have on the surrounding communities. In the draft it stated that the impacts will be significant to air quality, water quality, light pollution, noise pollution and many more issues. There are multiple issues with the inaccuracies and omissions in the report. We have seen March JPA and partnered developers make horrible decisions for these lands and keep residents and surrounding communities in the dark. The flight path and increased air traffic will harm surrounding communities and the negative effects cannot be ignored. We urge the JPA and developers to find a better alternative to this project. I am requesting a third party EIR report be made that is not affiliated with the developers or jpa and an oversight community element be introduced. We don't want to see a repeat of the upper plateau projects' belatant disregard for community input and benefit be ignored and pushed through as quickly as possible. Our members including myself are residents of Riverside, Mead valley, Good Hope, Meadowbrook and Perris will be directly affected by this project. There needs to be community outreach to include Perris, Moreno Valley, Riverside, and the rest of District 1 in informing the public about this project.

0-1.1 0-1.2 0-1.3 0-1.4 0-1.5 0-1.6 0-1.7 0-1.8 0-1.9 0-1.10

Regards, Inland Valley Alliance II.4 - RESPONSES TO ORGANIZATION COMMENTS

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Response to Comment Letter O-1

Inland Valley Alliance for Environmental Justice/Perris Parents for Clean Air Franco Pacheco
July 1, 2024

- **0-1.1** This comment is introductory in nature. Specific comments about the Proposed Project and/or environmental analysis of the EIR are provided below.
- 0-1.2 This comment claims that the EIR stated that the Proposed Project would have significant impacts related to "air quality, water quality, light pollution, noise pollution, and many more issues." As discussed in Section 3.2. Air Quality, of the EIR, impacts associated with air quality during construction would be less than significant with implementation of MM-AQ-1 (Construction Management Plan) and MM-AO-2 (Construction Requirements). The Proposed Project's operational air quality impacts, both at a project level and cumulatively, would be significant and unavoidable, even with the implementation of MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6 (Additional Air Quality Tenant Requirements). Furthermore, as discussed in Section 3.9, Hydrology and Water Quality, impacts to water quality were found to be less than significant with implementation of MM-HYD-1 (Water Quality BMPs), MM-HAZ-1 (Hazardous Materials Contingency Plan), MM-HAZ-2 (Stop Work, Groundwater Management), and MM-AQ-6. Additionally, as discussed in Section 3.1, Aesthetics, impacts from the Proposed Project (during both construction and operation) to daytime and nighttime views from light and glare would be less than significant and, as such, no mitigation is required. Lastly, as discussed in Section 3.11. Noise, impacts associated with operational flight noise were identified as being significant and unavoidable, even with the implementation of MM-NOI-2 (Future Tenant Aircraft Fleet). Noise impacts during construction would be less than significant with implementation of MM-NOI-1 (Construction Worker Hearing Protection).
- **0-1.3** This comment generally claims the EIR contains inaccuracies and omissions but does not identify any specific concerns.
- O-1.4 This comment raises general concerns regarding claims made by past developers and March JPA but does not identify any specific claims. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- O-1.5 This comment states that the flight path and increased air traffic would have negative effects on surrounding communities. The EIR discloses the impacts of the Proposed Project and imposes all feasible mitigation. A summary of the impacts of the Proposed Project is provided in Table ES-1, Summary of Project Impacts. Table ES-1 also lists the applicable mitigation measures related to identified significant impacts from the Proposed Project, as well as the level of significance after mitigation is identified. For a more detailed discussion of all impacts, please refer to Chapter 3, Environmental Analysis, of the EIR.
- O-1.6 This comment requests the consideration of alternatives but does not provide any specific concerns or recommendations. Chapter 5, Alternatives, of the EIR analyzes four alternatives for potential impacts. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce

the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- O-1.7 This comment requests that an additional EIR be prepared by a third party. As required by CEQA Guidelines Section 15084, the EIR represents MIPAA's independent judgment as MIPAA is responsible for its adequacy and objectivity.
- O-1.8 This comment references another project not associated with the Proposed Project in the March JPA Planning Area and raises concerns regarding consideration of public input. As discussed in Chapter 1, Introduction, of the EIR, there have been multiple opportunities for public comment on the Proposed Project over the last 3 years. The notice of preparation for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. During the 30-day public review period of the notice of preparation, March JPA held a scoping meeting on April 14, 2021. All issues and concerns raised in the comments have been fully addressed and analyzed in this Draft EIR. The Draft EIR was distributed for a 45-day public review period from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days, to provide time for additional public input (although not required by CEQA). The applicant held community meetings on June 18, 2024, July 1, 2024, and September 24, 2025. All comments received are responded to in this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **0-1.9** This comment generally describes the members of the Inland Valley Alliance. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **0-1.10** This comment requests additional community outreach to include Perris, Moreno Valley, Riverside, and the rest of District 1. Please see Response 0-1.8, above, regarding public outreach.

Comment Letter 0-2

Eden Vitakis

From: Mission Grove Neighborhood Alliance <missiongrovena@gmail.com> Sent: Monday, July 22, 2024 4:32 PM Jeffrey Smith; +CBFCentury@aol.com To: Subject: Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012) Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping 0-2.2 with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other 0-2.3 neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR: What measures will be taken to ensure the health and safety of workers and residents in the vicinity of the project site? How will the project address any potential risks of exposure to hazardous materials for vulnerable populations in the area? Are there any plans for regular health assessments and monitoring of individuals potentially affected by hazardous materials? What steps will be taken to ensure the proper disposal of hazardous materials to prevent long-term health impacts on the community? How will the project address any concerns raised by local residents regarding hazardous materials management?

	2	-
•	How will the project address any potential risks of exposure to hazardous materials for vulnerable populations in the area?	0-2.40
•	What measures will be taken to ensure the health and safety of workers and residents in the vicinity of the project site?	0-2.39
•	Are there any provisions for stakeholder engagement and consultation regarding hazardous materials management practices?	0-2.38
•	How will the project address any potential conflicts with neighboring land uses and communities regarding hazardous materials?	0-2.37
•	What steps will be taken to ensure the long-term sustainability of hazardous materials management practices at the project site?	0-2.36
	Are there any plans for remediation and cleanup of contaminated areas after the project is completed?	0-2.34
•	during the project? How will the project address any potential risks of contamination to nearby water sources from hazardous materials?	0-2.34
•	environment? What measures will be taken to ensure the safe and responsible disposal of hazardous wastes generated during the project?	0-2.32
•	materials? Are there any provisions for ongoing monitoring and reporting of hazardous materials impacts on the	0-2.32
	ecosystems and wildlife? How will the project address any potential risks to groundwater quality and availability posed by hazardous	0-2.30
	waste management? What steps will be taken to minimize the environmental impact of hazardous materials on surrounding	0-2.30
	and spills? Are there any plans for public education and awareness campaigns regarding hazardous materials and	0-2.29
	the project? How will the project ensure that hazardous materials are properly labeled and stored to prevent accidents	0-2.28
	incidents? What measures will be taken to prevent the unauthorized release or disposal of hazardous materials during	0-2.27
	are properly trained and equipped? Are there any provisions for emergency response and contingency planning in case of hazardous materials	0-2.26
	management plan? How will the project ensure that all workers and contractors involved in hazardous materials management	0-2.25
•	disposed of at the project site? What steps will be taken to address any gaps or deficiencies in the current hazardous materials	0-2.24
•	Are there any provisions for public access to information regarding hazardous materials used, stored, or	0-2.23
	materials throughout the project? How will the project address any potential conflicts with existing environmental regulations and guidelines?	0-2.22
	hazardous materials and waste management? What measures will be taken to ensure transparency and accountability in the handling of hazardous	0-2.21
	and waste management? Are there any plans in place to involve the local community in decision-making processes regarding	0-2.19
	construction and operation? How will the project address any potential environmental justice concerns related to hazardous materials	0-2.19
	management requirements? What measures will be taken to address any unforeseen hazards or risks that may arise during the project's	0-2.17
	hazardous materials? Are there any provisions for regular audits and inspections to verify compliance with hazardous materials	0-2.16
	management plan? How will the project ensure compliance with all relevant environmental laws and regulations related to	0-2.16
	materials management? What steps will be taken to address any gaps or inconsistencies in the current hazardous materials	0-2.15
	regarding hazardous materials? Are there any plans for ongoing collaboration with regulatory agencies and local authorities on hazardous	0-2.14
•	materials management? How will the project address any potential conflicts with existing land use regulations and zoning laws	0-2.13
•	What measures will be taken to ensure the equitable distribution of risks and benefits related to hazardous	0-2.12
•	Are there any provisions for community outreach and education programs on the risks associated with hazardous materials?	0-2.11

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•	Are there any plans for regular health assessments and monitoring of individuals potentially affected by hazardous materials?	0-2.41
•	What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid waste diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or after 2020 and annually thereafter?	0-2.42
٠	How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and emissions criteria?	0-2.43
•	What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	0-2.44
•	Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	0-2.45
•	How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	0-2.46
	What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment to minimize environmental impact?	0-2.47
•	How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft-related operational emissions, including the refueling of aircraft and the associated GHG emissions, as modeled using AEDT Version 3C in the report?	0-2.48
•	Can the report provide more information on the quantification of refrigerant emissions from air- conditioning equipment during regular operation and routine servicing over the equipment lifetime, as mentioned in the report?	0-2.49
•	How does the project ensure consistency with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard to meet the required standards and guidelines for sustainable development and energy efficiency?	0-2.50
•	What specific goals and policies from the Local March Joint Powers Authority General Plan are being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	0-2.51
•	How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	0-2.52
•	What measures are being taken to reduce emissions associated with the transportation of goods and vehicles related to the Proposed Project, as mentioned in the report?	0-2.53
•	How does the project plan to address emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment?	0-2.54
•	Can the report provide more details on the consistent evaluation of the Proposed Project with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard?	0-2.55
hank	you for your attention to these critical issues. I look forward to your response and further	T 0-2.56

Sincerely,

Brian Kerr Vice Chair - Mission Grove Neighborhood Alliance 214 Bathurst Road, Riverside, CA 92506 briank6021@gmail.com

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Response to Comment Letter O-2

Mission Grove Neighborhood Alliance Brian Kerr July 22, 2024

- **0-2.1** This comment is introductory in nature and raises general concerns about the analysis of the Proposed Project in the EIR. Specific comments are addressed in the following responses.
- This comment addresses general CEQA requirements, including formulation of project alternatives. The EIR and its technical reports analyzed the Proposed Project without bias. Chapter 5, Alternatives, of the EIR analyzed a reasonable range of alternatives in compliance with CEQA. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- 0-2.3 This comment raises concerns about noise impacts to residential neighborhoods to the west of Interstate 215 and northwest of March ARB/Inland Port Airport, As discussed in Section 3.11, Noise. of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and "Transient" (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based upon the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest.

The comment further raises concerns about March cargo operations in 2005–2008, apparently referring to DHL operations, which are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.¹⁸ As of 2024, there were fewer than 20 DC-9s still

¹⁸ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

in service.¹⁹ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.²⁰ This Project is not related to past cargo operations and is separate from the 2005–2008 DHL cargo flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- O-2.4 This comment generally claims the EIR contains "numerical errors and omissions" but does not identify any specific concerns. Additionally, the comment raises general concerns regarding statements made by past developers and March JPA, but does not identify any specific claims. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- O-2.5 The comment expresses general concerns regarding viability of the Proposed Project and its effect on quality of life. The EIR discloses the potential environmental impacts of the Proposed Project and imposes all feasible mitigation to address potentially significant impacts. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- **0-2.6** This comment is FAQ-HAZ-51 and FAQ-HYD-30. Please see the responses to FAQ-HAZ-51 and FAQ-HYD-30.
- **0-2.7** This comment is FAQ-HAZ-26. Please see the response to FAQ-HAZ-26.
- **0-2.8** This comment is FAO-HAZ-5. Please see the response to FAO-HAZ-5.
- **0-2.9** This comment is FAQ-HAZ-64. Please see the response to FAQ-HAZ-64.
- **0-2.10** This comment is FAQ-HAZ-22. Please see the response to FAQ-HAZ-22.
- **0-2.11** This comment is FAO-HAZ-11. Please see the response to FAO-HAZ-11.
- **0-2.12** This comment is FAQ-HAZ-50. Please see the response to FAQ-HAZ-50.
- **0-2.13** This comment is FAQ-LU-7. Please see the response to FAQ-LU-7.
- **0-2.14** This comment is FAQ-HAZ-2. Please see the response to FAQ-HAZ-2.
- **0-2.15** This comment is FAQ-HAZ-60. Please see the response to FAQ-HAZ-60.
- **0-2.16** This comment is FAQ-HAZ-30. Please see the response to FAQ-HAZ-30.

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

¹⁹ https://simpleflying.com/dc-9-operators-2024/

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

0-2.17	This comment is FAQ-HAZ-15. Please see the response to FAQ-HAZ-15.
0-2.18	This comment is FAQ-HAZ-49. Please see the response to FAQ-HAZ-49.
0-2.19	This comment is FAQ-HAZ-23. Please see the response to FAQ-HAZ-23.
0-2.20	This comment is FAQ-HAZ-8. Please see the response to FAQ-HAZ-8.
0-2.21	This comment is FAQ-HAZ-55. Please see the response to FAQ-HAZ-55.
0-2.22	This comment is FAQ-PROCESS-5. Please see the response to FAQ-PROCESS-5.
0-2.23	This comment is FAQ-HAZ-14. Please see the response to FAQ-HAZ-14.
0-2.24	This comment is FAQ-HAZ-59. Please see the response to FAQ-HAZ-59.
0-2.25	This comment is FAQ-HAZ-32. Please see the response to FAQ-HAZ-32.
0-2.26	This comment is FAQ-HAZ-12. Please see the response to FAQ-HAZ-12.
0-2.27	This comment is FAQ-HAZ-56. Please see the response to FAQ-HAZ-56.
0-2.28	This comment is FAQ-HAZ-33. Please see the response to FAQ-HAZ-33.
0-2.29	This comment is FAQ-HAZ-4. Please see the response to FAQ-HAZ-4.
0-2.30	This comment is FAQ-BIO-23 and FAQ-HAZ-65. Please see the responses to FAQ-BIO-23 and FAQ-HAZ-65.
0-2.31	This comment is FAQ-HAZ-27 and FAQ-HYD-28. Please see the responses to FAQ-HAZ-27 and FAQ-HYD-28.
0-2.32	This comment is FAQ-HAZ-13. Please see the response to FAQ-HAZ-13.
0-2.33	This comment is FAQ-HAZ-53. Please see the response to FAQ-HAZ-53.
0-2.34	This comment is FAQ-HAZ-25 and FAQ-HYD-27. Please see the responses to FAQ-HAZ-25 and FAQ-HYD-27.
0-2.35	This comment is FAQ-HAZ-6. Please see the response to FAQ-HAZ-6.
0-2.36	This comment is FAQ-HAZ-63. Please see the response to FAQ-HAZ-63.
0-2.37	This comment is FAQ-LU-2. Please see the response to FAQ-LU-2.
0-2.38	This comment is FAQ-HAZ-16. Please see the response to FAQ-HAZ-16.
0-2.39	This comment is FAQ-HAZ-51 and FAQ-HYD-30. Please see the responses to FAQ-HAZ-51 and FAQ-HYD-30.

0-2.40	This comment is FAQ-HAZ-26. Please see the response to FAQ-HAZ-26.
0-2.41	This comment is FAQ-HAZ-5. Please see the response to FAQ-HAZ-5.
0-2.42	This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6.
0-2.43	This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5.
0-2.44	This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3.
0-2.45	This comment is FAQ-LU-1. Please see the response to FAQ-LU-1.
0-2.46	This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
0-2.47	This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15.
0-2.48	This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10.
0-2.49	This comment is FAQ-GHG-4. Please see the response to FAQ-GHG-4.
0-2.50	This comment is FAQ-ENG-3. Please see the response to FAQ-ENG-3.
0-2.51	This comment is FAQ-LU-6. Please see the response to FAQ-LU-6.
0-2.52	This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
0-2.53	This comment is FAQ-AQ-12. Please see the response to FAQ-AQ-12.
0-2.54	This comment is FAQ-AQ-8. Please see the response to FAQ-AQ-8.
0-2.55	This comment is FAQ-ENG-2. Please see the response to FAQ-ENG-2.
0-2.56	This comment is conclusory in nature. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Comment Letter 0-3

Eden Vitakis

From: Veronica Lebron <paralegal@channellawgroup.com>

Sent: Monday, July 22, 2024 4:58 PM

To: Jeffrey Smith; Info; Cindy Camargo; Dan Fairbanks
Cc: Jamie Hall; Hannah Simon; Christopher Rodriguez

Subject: Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway

Aviation Center Project (SCH#: 2021040012)

Attachments: 2024-07-22 Comments on DEIR for Meridian D-1 Gateway Aviation Center Project (SCH

2021040012).pdf

Good afternoon:

Please see attached for inclusion in the record for the abovereferenced matter.

0-3.1

Please confirm receipt.

Thank you.

Veronica Lebron Practice Manager / Paralegal Channel Law Group, LLP 8383 Wilshire Blvd., Suite 750 Beverly Hills, CA 90211 Office Number: (310) 347-0050 Direct Number: (323) 886-2406

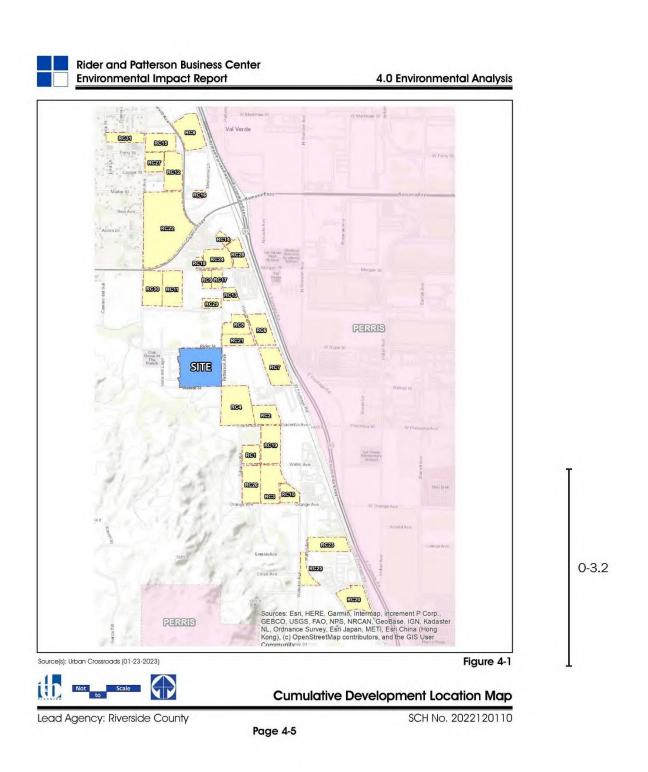
Fax: (323) 723-3960

paralegal@channellawgroup.com

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JULIAN K. QUATTLEBAUM, III JAMIE T. HALL * CHARLES J. McLURKIN GREGORY T. WITTMANN

*ALSO Admitted in Texas

July 22, 2024

Writer's Direct Line: (310) 982-1760 jamie.hall@channellawgroup.com

VIA ELECTRONIC MAIL

March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, CA 92518 ATTN: Jeffery M. Smith, AICP, Principal Planner smith@marchjpa.com

Re: Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH#: 2021040012)¹

Dear Mr. Smith:

This firm represents Rural Association of Mead Valley with regard to the Meridian D-1 Gateway Aviation Center Project ("Project"). I am writing to advise you that the Environmental Impact Report ("EIR") for the Project is deficient and that no action with regard to the Project should be taken until defects in the EIR and the March Joint Powers Authority's California Environmental Quality Act ("CEQA") compliance are cured. As detailed in this comment letter, the March Joint Power Authority ("JPA") has engaged in improper piecemealing of the analysis of development of the JPA Planning Area and proposed Project. This is a fatal flaw of the EIR. Even if impermissible piecemealing did not render the EIR fatally flawed, other defects in the EIR would necessitate correction and recirculation of the document. This is because the EIR fails to adequately address the indirect impacts of the proposed Project, and fails to accurately and adequately address the impacts of both Project and Cumulative development in the area. The EIR for the Project is thus fatally flawed and must therefore be revised and recirculated for public review and comment.

The EIR is available at: https://ceqanet.opr.ca.gov/2021040012/2

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0-3.3

I. INTRODUCTION

A. The Lead Agency

The Lead Agency for the EIR for the West March Upper Plateau Project is the March Joint Powers Authority ("JPA"). As noted on the JPA's website: ²

The March JPA, in addition to being designated as the federally recognized reuse authority for the former active duty base, has also assumed other responsibilities. These authorities include:

California Redevelopment Agency

The March Joint Powers Redevelopment Agency was established with the formation of the March AFB Redevelopment Project Area, which includes the entire 6,500-acre former active duty base area, and approximately 450 acres adjacent to the base in the industrial area of the City of Moreno Valley.

Land Use Authority

On March 11, 1997, land use authority was transferred to March JPA from the County of Riverside. The March JPA has adopted development and building codes and standards. The March JPA General Plan has been developed by the March JPA in accordance with state statutes, as well as the associated Master Environmental Impact Report. The March JPA General Plan is designed to implement the March Final Reuse Plan and related activities.

Airport Authority

March Inland Port Airport Authority (MIPAA), is a governing body under the governance umbrella of the March JPA. MIPAA is responsible for the development and operation of the March Inland Port (MIP), a joint-use aviation facility targeted for air cargo operations.

As further detailed on the Lead Agency's website:3

The March JPA is planning and implementing new uses for currently vacant lands, reuse of existing facilities, and joint use of the airfield

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0-3.3 Cont.

0-3.4

https://marchjpa.com/about/march-jpa-mission/

https://marchjpa.com/about/

facilities for the development of an air cargo facility. In short, long-term economic gains in the form of developing a civilian air cargo center, and the growth and development of an employment center to account for 38,000 jobs, are projected.

B. The Proposed Project

The proposed Project analyzed in the EIR includes:

A proposal by Meridian Park D-1, LLC to develop the Meridian D-1 Gateway Aviation Center Project (Proposed Project), including an Air Cargo Center Component and Off- Site Component located on approximately 46 acres. The Air Cargo Center Component would include the development of a gateway air freight cargo center, including taxilane/taxiway and parking improvements, within an approximately 34acre site within March Inland Port Airport under the jurisdiction of March Joint Powers Authority (JPA). The gateway air freight cargo center includes the construction of an approximately 180,800-square-foot cargo building with 9 grade-level loading doors, 31 truck dock positions, and 37 trailer storage positions. The cargo building would contain approximately 9,000 square feet of office space. The Air Cargo Center Component would also include work in the public right-of-way within Heacock Street on the eastern boundary of the project site. The Off-Site Component would be constructed on approximately 12 acres and would include taxiway and taxilane construction, widening, and realignment; storm-drain extensions; and a perimeter patrol road with security fencing within March Air Reserve Base (ARB). Vehicular access to the project site would occur at a new signalized entrance onto Heacock Street, expanding the existing access roadway currently serving the facilities south of the project site. The Off-Site Component would include construction on land owned by March ARB. Development occurring on March ARB would require easements with the Department of the Air Force within five work areas. The Proposed Project would also require a zoning designation and a plot plan approval.

Once constructed, the Proposed Project is anticipated to average 17 flights per day, 6 days per week (non-peak). During the peak season (i.e., late November through late December), the Proposed Project is anticipated to average 22 flights per day, 6 days per week. Aircraft operations would occur between 7:00 a.m. and 11:00 p.m. (approximately 5% of the proposed aircraft operations would occur between 10:00 p.m. and 11:00 p.m.).

0-3.5

0-3.6

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The proposed Project thus includes a large cargo building and expanded air cargo operations in a region that has been experiencing a substantial amount of past, present and reasonably foreseeable warehouse development.

The proposed Project is located within the March JPA Planning Area. According to the March Joint Powers Authority General Plan, the Planning Area includes the entire boundaries of the former March Air Force Base ("AFB"), prior to base realignment in April of 1996. One of the key objectives of the Project is to: "More fully utilize the operations capacity of the MIP Airport to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region." However, the EIR largely ignores the likely and intended the relationship of the proposed Project to growth in warehouse use and facilities with the JPA and the associated growth-inducing impacts. In fact a key goal of the 1999 March JPA General Plan includes capitalizing on the realignment of March AFB to create an employment and economic center that will add to the Western Riverside County region and to achieve an equitable balance between job availability and housing supply.⁵

C. Required Discretionary Approvals

The Proposed Project requires the following discretionary approvals from the JPA, as detailed on DEIR pages to 2-10 to 2-11, as well as other discretionary approvals from other agencies as shown in DEIR Table 2-4 reproduced below:

- Zoning Designation: The project site has not previously been assigned a zoning designation; therefore, to be consistent with the current March JPA General Plan land use designation of Aviation (AV), the Proposed Project is requesting a zoning designation of Aviation (A) for the approximately 34-acre Air Cargo Center Component.
- Plot Plan: Concurrent with the requested zoning designation, the Proposed Project is requesting approval of a Plot Plan Application to allow construction of the following within March JPA jurisdiction:
 - An approximately 180,800-square-foot cargo building with 9 grade-level loading doors and 31 dock positions, parking aprons sufficient to support commercial cargo airplanes, 37 trailer storage positions, and 122 stalls for employee parking.
 - An expansion of the existing taxiways/tarmac.

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0-3.6 Cont.

0 - 3.7

Draft EIR page ES-4.

⁵ General Plan, page 1-5.

- Construction of stormwater facilities, including an underground detention basin.
- Expansion of the existing access roadway and a signalized entrance onto Heacock Street.
- Utility connections within existing access roadway and Heacock Street, including water, sewer, electrical, and gas.

Table 2-4. Permits, Approvals, and Discretionary Actions of Other Federal, State, and Local Agencies

Agency	Permit
Federal	
Federal Aviation Administration	Approval of Environmental Assessment prepared per the National Environmental Policy Act; approval of the Airport Layout Plan update
Department of the Air Force	Approval of Environmental Assessment prepared per the National Environmental Policy Act
U.S. Army Corps of Engineers	Clean Water Act Section 404 Nationwide Permit

Table 2-4. Permits, Approvals, and Discretionary Actions of Other Federal, State, and Local Agencies

Agency	Permit
March Air Reserve Base	Approval of the tarmac expansion and necessary easements for Work Areas 1–5
State or Regional	
State Water Resources Control Board	National Pollutant Discharge Elimination System Construction General Permit, which would include a stormwater pollution prevention plan
California Department of Fish and Wildlife	California Fish and Game Code Section 1600 Streambed Alteration Agreement
California Department of Toxic Substances Control	Notification prior to construction for (1) approval of the project under the Environmental Restrictive Covenant and (2) approval of the hazardous materials contingency plan
Regional Water Quality Control Board, Santa Ana Region	401 Water Quality Certification or a Waste Discharge Requirement Permit (401 needed if a U.S. Army Corps of Engineers Section 404 Nationwide Permit is needed)
Local	
Riverside County Airport Land Use Commission	Consistency finding with the March Air Reserve Base/ Inland Port Airport Land Use Compatibility Plan
City of Moreno Valley	A traffic control plan if Project construction restricts traffic on Heacock Street and permits for road closures

D. The Project's Significant Unavoidable Impacts

The proposed Project would result in a number of significant environmental impacts requiring mitigation, including the following significant and unavoidable impacts:

Air Quality. As discussed in Section 3.2.5, the Proposed Project would exceed
operational regional thresholds of significance for volatile organic compounds,
oxides of nitrogen, and carbon monoxide emissions, resulting in a significant
impact. Mitigation Measure (MM) AQ-3 through MM-AQ-6 would reduce
emissions, but not to a less-than-significant level. As such, the Proposed Project

0-3.7 Cont.

0-3.8

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would have a significant and unavoidable impact related to Threshold AQ-2 and would result in a cumulatively considerable net increase of criteria pollutants for which the region is in nonattainment.

- Air Quality. Additionally, the Proposed Project would have a significant and unavoidable impact related to Threshold AQ-1 and would conflict with South Coast Air Quality Management District's 2022 Air Quality Management Plan.
- Noise. The Proposed Project would expose noise-sensitive residential receptors nearest the March ARB/Inland Port Airport flight path to excessive operational noise levels. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e., acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult. The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, March JPA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 would reduce impacts but not to a less-than-significant level. Therefore, Threshold NOI-3 in Section 3.11.5, would be significant and unavoidable even with the application of feasible mitigation.

E. CEQA Recirculation Requirements

CEQA Guidelines Section 15088.5 specifies when recirculation of an EIR is required prior to certification. CEQA Guidelines Section 15088.5 states in part:⁶

(a) 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. As used in this section, the term "information" can include changes in the project or environmental setting as well as additional data or other information. 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 (including a feasible project alternative) that the project's

0-3.8 Cont.

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⁶ CEQA Guidelines Section 15088.5(e) specifies: A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

proponents have declined to implement. "Significant new information" requiring recirculation include, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (Mountain Lion Coalition v. Fish and Game Com. (1989) 214 Cal.App.3d 1043)

II. THE EIR IS FATALLY FLAWED DUE TO FAILURE TO ANALYZE THE WHOLE OF THE ACTION

As explained in CEQA Guidelines § 15003. POLICIES: "(h) The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect. (Citizens Assoc. For Sensible Development of Bishop Area v. County of Inyo (1985) 172 Cal.App.3d 151)." In fact, CEQA Guidelines § 15378 PROJECT defines a "Project" as:

- (a) "Project" means the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:
 - (1) An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of

0-3.9 Cont.

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local General Plans or elements thereof pursuant to Government Code Sections 65100–65700.

- (2) An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- (3) An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

As explained by the Association of Environmental Professionals:7

Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less- than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies.

In general, if an activity or facility is necessary for the operation of a project, or necessary to achieve the project objectives, or a reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis. The project description should include all project components, including those that will have to be approved by responsible agencies. When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

March JPA has engaged in impermissible piecemealing both in terms of analysis of development of the Planning Area as a whole, and in conducting separate CEQA analysis for

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AEP CEQA Portal Topic Paper, Project Description, available at: https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf

connected projects. Specifically, at a minimum March JPA has engaged in impermissible project splitting/piecemealing of the following projects:⁸

- The Proposed Project The Meridian D-1 Gateway Aviation Center Project (SCH#2021040012) ("Aviation Center" or "Project")
- West March Upper Plateau Project (SCH#2021110304)
- South Campus Specific Plan and Village West Drive Extension Project (SCH#2020059028) ("South Campus Specific Plan")

A. Impermissible Piecemealing of Development of the March JPA Planning Area

Development of the JPA Planning Area has been treated as a single project in past EIRs including the EIRs for the March Air Force Base Master Reuse Plan, ⁹ the March Air Force Base Redevelopment Project, ¹⁰ and the General Plan of the March Joint Powers Authority. Unfortunately, these Plans and their associated EIRs are woefully outdated, and rather than update the plan for the Planning Areas as a whole and its associated EIR, the JPA has proceeded with piecemealed review of development projects within the Planning Area. It has done this despite the fact that the JPA has an overall goal and vision for development within the JPA area (see **Attachment A**). ¹¹

As part of implementing its vision for the Planning Area, the JPA essentially acquired ownership of the Planning Area on: 12

January 28, 2000, the Air Force and the Authority entered into the Economic Development Conveyance Agreement Between the Department of the Air Force and the March Joint Powers Authority (the "EDC"). The EDC provides for transfer of the Property from the Air Force to the Authority at no cost. Consistent with federal law governing No-Cost Economic Development Conveyances, Section 2.1.1 of the EDC restricts the Authority's use of proceeds from any sale, lease or other use of the Property to promotion of the economic redevelopment of the Property and

0-3.11 Cont.

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⁸ Additional components of Planning Area development may also represent impermissible project splitting, however, insufficient information is available on the CEQAnet website to document this, and a Public Information Act Requests is required.

https://www.marchjpa.com/documents/docs forms/final reuse plan.pdf

https://www.marchipa.com/documents/docs_forms/redevelopment_1996.pdf

Information in Attachment A is from the JPA's website.

Page 2 West March Disposition and Development Agreement, https://www.marchipa.com/documents/docs_forms/joint_use_agreement.pdf

generation of jobs. Pursuant to Section 2.1.3 of the EDC, allowable uses of such proceeds include construction of the Backbone Infrastructure.

Thus, with execution of the EDC, the JPA became not just the Lead Agency for development projects within the Planning Area, but also the owner of the property within the Planning Area no longer under Air Force control. This gave the JPA the ability to specify and control future land use in the Planning Area.

Also, as part of implementing its vision for the development of the JPA Planning Area, the JPA entered into a Joint Use Agreement for March Air Force Base with the Air Force, which acknowledges that the JPA "desires to use the Flying Facilities at MARB for commercial passenger and air cargo operations.¹³

B. Prior Environmental Review of March JPA

Prior environmental review documents for the Planning Area as a whole are significantly outdated. According to page 1-3 of the DEIR for the West March Upper Plateau Project plans for development of the JPA has been analyzed under both CEQA and the National Environmental Policy Act in the following documents: 14

- 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)¹⁵
- Final Air Installations Compatible Use Zone Study, March Air Reserve Base (2018)

Thus, environmental review of the whole of the action, reuse and redevelopment of the March JPA Planning Area, is 27 years old in the case of the Reuse Plan and Redevelopment

0-3.11 Cont.

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https://www.marchipa.com/documents/docs forms/joint use agreement.pdf

Environmental documents for the West March Upper Plateau Project are available at: https://ceqanet.opr.ca.gov/Project/2021110304

Public Resource Code Section 21157.6. Limitation Period on Use of Environmental Impact Report limits the use of a Master Environmental Impact Report to five years from the date of certification, except under limited conditions.

Project EIRs and 24 years old in the case of its guiding March JPA General Plan and associated Master Environmental Impact Report for the General Plan of the March Joint Powers Authority. Clearly there have been: ¹⁶

- (a) Substantial changes proposed in the planned reuse and redevelopment of the March JPA Planning Area since the issuance of the Master Environmental Impact Report for the General Plan of the March Joint Powers.
- (b) Substantial changes have occurred with respect to the circumstances in the area since the issuance of the Master Environmental Impact Report for the General Plan of the March Joint Powers.
- (c) New information, which was not known and could not have been known at the time since the Master Environmental Impact Report for the General Plan of the March Joint Powers was certified as complete, has become available.
- C. Development Projects in the Planning Area Since Certification of the Master

 Environmental Impact Report for the General Plan of the March Joint

 Powers Authority Was Certified

According to CEQAnet, the following past and present projects producing related or cumulative impacts are within the Planning Area (see **Attachment B** for links to State Clearinghouse documents which are incorporated herein by reference):

TABLE 1 List of Projects In the JPA Planning Area With State Clearinghouse Numbers Description Project SCH#2023060739: Meridian Storm Drain The project consists of a master planned Pipeline Extension Project (MND) storm drain improvement project including the construction of an underground 6-foot by https://ceganet.opr.ca.gov/2023060739 4-foot reinforced concrete box (RCB) from an existing 6-foot by 3-foot RCB, extending approximately 2,350 linear feet south and connecting to existing dual 48-inch RCP's at the Riverside County Transportation Commission (RCTC) railroad right-of-way. SCH#2023040073: *PROJECT WITHDRAWN PER LEAD* Demolition of

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Paraphrasing Public Resources Code ("PRC") Section 21166

TAE	BLE 1	
List of Projects In the JPA Planning Area With State Clearinghouse Numbers		
Project	Description	
Abandoned Security Police Kennel Support Facility (NOE) https://ceqanet.opr.ca.gov/2023040073		
mups.//cequiret.opr.ca.gov/2023040073		
SCH#2022100591: West March Disposition		
and Development Agreement, Amendment No. 2 (NOE)		
https://ceqanet.opr.ca.gov/2022100591		
SCH#2022100592: Amended lease between		
the March Joint Powers Authority and the County of Riverside (NOE)		
https://ceqanet.opr.ca.gov/2022100592		
SCH#2022090637: Memorandum of Understanding between the March Joint		
Powers Authority and Meridian Park LLC for the Perris Valley Flood Control and Drainage Project, Lateral B (NOE)		
https://ceqanet.opr.ca.gov/2022090637		
SCH#2022080226: Grant of Temporary Construction Easements and Permanent		
Access, Pipeline and Tunnel Easements to the Metropolitan Water District (MWD) (NOE)		
https://ceqanet.opr.ca.gov/2022080226		
SCH#2022060180: Grant of Easement to Southern California Edison - Installation of		
Infrastructure Improvements for the		

0-3.12 Cont.

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TABLE 1	
List of Projects In the JPA Planning A	rea With State Clearinghouse Numbers Description
Implementation of the AT&T Tower at March Field Air Museum (NOE) https://ceqanet.opr.ca.gov/2022060180	
SCH#2021110304: West Campus Upper Plateau Project (EIR) https://ceqanet.opr.ca.gov/Project/2021110304	This is the Proposed Project
SCH#2021120547: Cooperative Reimbursement Agreement between the March Joint Powers Authority, March Inland Port Airport Authority and Riverside County Flood Control District (NOE) https://ceqanet.opr.ca.gov/2021120547	
SCH#2021120453: PP 18-04 (NOE) https://ceqanet.opr.ca.gov/2021120453	On December 11, 2019, the March Joint Powers Commission approved multiple applications on the 35.4-acre K4 parcel, including the Final EIR, a General Plan Amendment to approve the Industrial land use designation, and a Plot Plan application to allow a 718,000 square foot warehouse distribution building. The supporting Zone Change was formally adopted on January 8, 2020. The building is near construction completion, and the developer requests that the required solar voltaic system be deferred for up to a five-year period, or until another tenant occupies the building.
SCH#2021060538: Lease Agreement between the March Joint Powers Authority and the County of Riverside Facilities Management Department (NOE)	

0-3.12 Cont.

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TABLE 1 List of Projects In the JPA Planning Area With State Clearinghouse Numbers	
Project	Description
https://ceqanet.opr.ca.gov/2021060538	
SCH#2021040702: Memorandum of Understanding between the March Joint Powers Authority, Riverside County Flood Control and Water Conservation District and March Air Reserve Base (NOE) https://ceqanet.opr.ca.gov/2021040702	
SCH#2021040012: Meridian D-1 Gateway Aviation Center Project (NOP) https://ceqanet.opr.ca.gov/2021040012	The proposed Project consists of two components, the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component would be constructed within approximately 64-acres under March Joint Powers Authority jurisdiction. The Off-Site Component would be constructed within approximately 24 acres, and would include taxiway construction, widening, and realignment, storm-drain extensions, and an access roadway construction within March Air Reserve Base (approx. 23 acres), as well as work within the public-right-of-way along Heacock Street adjacent to the eastern boundary of the Project site (approx. 1 acre). The following discretionary approvals would be required: (1) A plot plan approval to construct: an approximate 201,200-square-foot air cargo building with 9 grade level doors and 42 dock positions; a parking apron sufficient to support commercial cargo airplanes; 90 trailer storage positions; 214 stalls for employee parking; an approximate 69,620-square-foot maintenance building with grade level access and 42 stalls for employee parking; an expansion of the existing taxiway/tarmac within March Air Reserve Base; construction

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TABLE 1		
List of Projects In the JPA Planning As Project	rea With State Clearinghouse Numbers Description	
	of stormwater facilities, including an underground detention basin; removal of an existing security fence and construction of a new security fence; and a signalized entrance onto Heacock Street, aligned with the facility entrance across Heacock Street; (2) a zoning designation of Aviation (AV) for the approximate 64-acres of the Project site within March Joint Powers Authority jurisdiction.	
SCH#2021010211: The Westmont Village Industrial Warehouse Project (EIR)	The Project site consists of ±221.82 acres designated under MJPA's General Plan land	
https://ceqanet.opr.ca.gov/2021010211/2	use as Industrial Zoning and Institutional Residential Zoning under the Specific Plan Amendment proposal. Notice that the March Joint Powers Authority (MJPA) will be the lead agency and will prepare a Draft Environmental Impact Report (DEIR) for the Westmont Village Specific Plan Amendment (Project).	
SCH#2020059028: South Campus Specific Plan and Village West Drive Extension Project (Subsequent EIR)	The proposed Project involves an amendment to the March Business Center Specific Plan (SP-1), originally approved in 2003. The proposed Project includes Plot Plan approvals	
https://ceqanet.opr.ca.gov/Project/2020059028	for the following components of the South Campus buildout: development of a Commercial Parcel; construction of 800,000 square-foot Building D; construction of a 6.2-acre Dog Park and Paseo; construction of Gless Ranch Road and Caroline Way; and the extension of Village West drive south of Lemay Drive to Nandina Avenue. In addition the SEIR will analyze up to 700,000 square feet of high-cube cold storage warehousing, request a revision to the definition of "Business Enterprise" in the Specific Plan, and include a definition for "Grocery Store" in the Specific Plan. The following discretionary approvals would be required: 1) General Plan Amendment: GP 20-01; 2)	

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TABLE 1		
List of Projects In the JPA Planning Area With State Clearinghouse Numbers		
Project	Description	
	Specific Plan Amendment (SP-1, Amendment 8): SP 20-01; 3) Plot Plan: PP 20-03 for 45,000 square feet Grocery Store and two shop buildings and Village West Drive extension; 4) Plot Plan: PP 20-04 Building D within the South Campus and Caroline Way; 5) Plot Plan: PP 20-05 South Campus Dog Park and Paseo; 5) Conditional Use Permit: CUP 20-02 for Alcohol sales at 45,000 square foot Grocery Store; 6) Tentative Parcel Map: TPM 20-02 South Campus.	
SCH#2020090483: AT&T Tower at March Field Air Museum (NOE)		
https://ceqanet.opr.ca.gov/2020090483/2		
SCH#2020090415: Final Map 3790 I (Final Map 20-03) for condominium purposes for the MS Van Buren II Business Park (NOE) https://ceqanet.opr.ca.gov/2020090415/2	Final Map 37901 (Final Map 20-03) for condominium purposes was approved to create separate air space for each of the thirteen buildings previously approved as part of the MS Van Buren II Business Park. The condominium map would now allow individual sale and ownership of each building. This will facilitate small business owners to occupy and own their own facility. In addition to the condominium conversion described above, the parcel map will make minor adjustments to internal parcels lines to better align with existing parking lot improvements.	
SCH#2020080041: Tentative Parcel Map 20- 03 (TPM 20-03) for condominium purposes for the MS Van Buren II Business Park (NOE) https://ceqanet.opr.ca.gov/2020080041/2	Tentative Parcel Map 20-03 (TPM 20-03) for condominium purposes was approved to create separate air space for each of the thirteen buildings previously approved as part of the MS Van Buren II Business Park. The condominium map will allow individual sale and ownership of each building. This will facilitate small business owners to occupy	

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TABLE 1 List of Projects In the JPA Planning Area With State Clearinghouse Numbers Project Description	
SCH#2020040290: Design Plan 19-05: Eagle Business Park (NOE) https://ceqanet.opr.ca.gov/2020040290/2	On April 8, 2020, the March Business Center Design Implementation Committee ProJect: I approved Design Plan 19-05 for the development of a business park development ranging from 78,960 to 123,500 square feet (sf) with a combined total of 390,480 I sf consisting of four (4) buildings on I 9.84 acres. The business park is designed to accommodate a combination of both Business Enterprise (warehouse uses I under 50,000 sf) and Light Manufacturing uses consistent with the Permitted Uses Table 111-1 on page III- I and Table III-2 on page III-14 of the March Business Center Specific Plan (SP-I, A7). Site access would be provided I through five driveways all located off Krameria Avenue - 3 passenger car only driveways and 2 service driveways for trucks.
SCH#2020060596: Offer of Dedication: Brown Street, County of Riverside (NOE) https://ceqanet.opr.ca.gov/2020060596/2	A 28' wide, approximately 2,543.82 linear feet, portion of Brown Street, west of the intersection of Meridian Parkway and Alessandro Boulevard, south of Alessandro Boulevard, surrounded by March Joint Powers Authority (JPA) properties to the east, south and west. The project also includes the full construction of Brown Street along the easterly property line, adjacent to the MJPA jurisdictional boundary, Riverside County, California
SCH#2020060150: Determination of Substantial Conformance No. 2 for the approved Plot Plan 17-05 for the MS Van Buren II Business Park located at 21750 - 21880 Van Buren Blvd	

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TABLE 1	
List of Projects In the JPA Planning Ar Project	rea With State Clearinghouse Numbers Description
https://ceqanet.opr.ca.gov/2020060150/2	
SCH#2018121026: Heacock Street Truck Terminal Facility (MND)	The project would include landscaping encompassing approx 1.43 acres. Open space (1.57 acres) and a retention basin (0.61 acre)
https://ceqanet.opr.ca.gov/Project/2018121026	are proposed south of the proposed parking area. South of the open space and retention basin is an existing retention basin that is not proposed to be modified, and it encompasses approx 0.6 acres. The project also includes the installation of two 36-in pipelines to connect to the existing two 36-in pipelines that convey surface water into the onsite drainage channel. The two proposed 36-in pipelines would convey storm water received offsite to the proposed open space. The surface water from the proposed truck parking area would be collected in pipelines that would convey the storm water to a proposed underground infiltration basin under the parking lot. The infiltration basin would have a capacity of approx 0.53 acre-feet after which storm water would be conveyed by pipeline to the proposed retention basin. Finally, the project includes the installation of a 12-ft high screen wall along the eastern and
SCH#20160661020: Meridian West Campus – Lower Plateau Project (EIR)	southern property lines. The approximately 130 acre project site is located south of Alessandro Blvd, west of Meridian Parkway, north of Opportunity
https://ceqanet.opr.ca.gov/Project/2016061020	Way, and generally east of Plummer Street, in unincorporated Riverside County, CA. Note that a September 2012 Settlement Agreement for the development of the project site, identified 120 acres of development and 10 acres of new roadways. The roadways are no longer proposed and the area would formerly envisioned to be public roadways would be absorbed into the project site plan; the

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ea With State Clearinghouse Numbers Description
proposed footprint of development would remain unchanged from the Settlement Agreement. Specifically, the project site is located to the west of the intersection of Meridian Parkway and Cactus Ave. I-215 is located approximately 0.5 mile east of the project site.
The proposed project is seeking a plot plan, general plan amendment, specific plan, parcel map and development agreement in support of the development of industrial buildings that would allow for a mix of (non-aviation) logistics center uses that could support wholesale, storage, distribution, manufacturing and/or assembly center uses. A total of 2,219,852 sf of building space is proposed in two buildings with parking, landscaping, drainage facilities and off-site improvements. The proposed project site encompasses 142.5 acres
Meridian Specific Plan land uses including following: Business Park (BP): including administrative, financial, light manufacturing and commercial services Industrial (IND): including manufacturing, warehousing, and associated uses. Office (OF): commercial office building accommodating professional and/or administrative services Mixed Use (MU): complementary uses, including commercial retail, office, research and development, industrial, and others. Commercial (COM): retail and service oriented land uses Park/Recreation/Open Space (P/R/OS): primarily passive open space and recreational areas. The proposed project would be amendment to the Meridian (formerly March Business

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TAB	LE 1
List of Projects In the JPA Planning A	rea With State Clearinghouse Numbers Description
rroject	in the northwestern portion of Riverside
	County, California. Meridian is situated west
	of I-215 and south of Alessandro Boulevard,
	on land that was formerly a part of the March
	Air Force Base (MAFB). The environmental
	consequences of the Meridian Specific Plan
	were disclosed, together with approved
	mitigation measures, in the March Business
	Center Focused EIR (February 2003) (SCH#
	2002071089). The focused EIR provided a
	Project level environmental review.
	Following FEIR certification and permitting,
	development commenced on the 669-acre
	North Campus area of Meridian, which is
	located on the west side of I-215, to the south
	of Alessandro Boulevard and to the north of
	Van Buren Boulevard. Numerous parcels
	have been developed and occupied since
	2003, while others are in various stages of
	development. The previous focused EIR for
	the Meridian Specific plan was a Project leve
	review. The SEIR prepared for the proposed
	Amendment will also provide a project-level
	review of environmental impacts associated
	with the proposed Specific Plan Amendment.
	The proposed Amendment is limited to a
	subset of the lots contained in the Meridian
	North Campus area; no changes are proposed in the South Campus. The Amendment
	consists of the following changes, revisions,
	and new information.
SCH#2008071021: March Lifecare Campus	Development of a 3,555,000 square foot
Specific Plan (EIR)	medical campus, allowing the following land
	use designations: (1) General Medical Office
https://ceqanet.opr.ca.gov/Project/2008071021	(2) Medical Related Retail; (3) Research and
	Education; (4) Residential Care Facilities; (5)
	Wellness; and (6) Mixed Use.
SCH#2002071089: March Business Center	The project involves the development of
Specific Plan (EIR)	approximately 1,290 acres of mostly vacant
	land in the north western portion of Riverside

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TAB	BLE 1	
	rea With State Clearinghouse Numbers	
Project	Description	
https://ceqanet.opr.ca.gov/Project/2002071089	County, California. The type, intensity, and organization of project land uses are regulated by the March Business Center Specific Plan. The following general land use designations are proposed: Business	
	Park(BP): (539 acres) including administrative, financial and commercial	0-3 12
	services. Industrial(IND): (370 acres) including manufacturing, warehousing and associated uses. Office(OF): (44 acres) commercial office building accommodating professional and/or administrative services. Mixed Use(MU): (125 acres) complementary uses including commercial retail, office, research and development, industrial and others. Commercial(COM): (38 acres) providing retail and service oriented land uses. Park/Open Space Recreation: (174 acres)	Cont.
SCH#1997071095 - General Plan of the	The March JPA Planning Area encompasses	
March Joint Powers Authority	6,500 acres which was formerly March Air Force Base, March AFB realigned to March	1
(EIR)	ARB in 1996, & the site had no formal zoning or general plan land use designation	T
https://ceqanet.opr.ca.gov/1997071095/2	prior. Site has historically been classified as federal property, not subject to local land use zoning & GP regulations.	
	The March Joint Powers Authority General Plan is a long range comprehensive plan designed to outline and delineate use and development opportunities of the area, while preserving the environmental quality. The	0-3.13
	General Plan contains goals, policies, and programs to guide future development and change in the Planning Area. The goals and policies of the General Plan serve as the constitutional framework for March JPA; provide planning direction for JPA operations and programs, and function as guidelines for	V

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Project	Description				
	all decision-making concerning use and development of the area. The March JPA General Plan contains the state mandated seven elements, additional element components have been added as part of the General Plan. The elements comprise the March JPA General Plan in accordance with the State General Plan Guidelines.				
a number of which are processed with	ojects within the Planning Area include multiple actions an NOE. For the full list of actions for each State rovided summary link for each State Clearinghouse				

D. <u>Improper Piecemealing of Environmental Review of Projects Within the JPA Planning Area</u>

Both the General Plan and the Master EIR for the General Plan are outdated. The March JPA General Plan is 24 years old and has reached the end of its useful life. According to the State Office of Planning and Research ("OPR"): ¹⁷

By statute, the general plan is required to be updated "periodically." While there is no requirement for how often to update the general plan, the planning period has traditionally been 15-20 years. Some cities and counties update their general plans as often as every 5 years, while others update in portions over time."

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https://opr.ca.gov/docs/General Plan Guidelines FAQ.pdf

The most recent environmental document for development of the March JPA as a whole is the Master Environmental Impact Report for the General Plan of the March Joint Powers Authority (September 1999). ¹⁸ Pursuant to Public Resources Code ("PRC") § 21157.6:

§ 21157.6. LIMITATION PERIOD ON USE OF ENVIRONMENTAL IMPACT REPORT

- (a) The master environmental impact report shall not be used for the purposes of this chapter if either of the following has occurred:
 - (1) The certification of the master environmental impact report occurred more than five years prior to the filing of an application for the subsequent project.
 - (2) The filing of an application for the subsequent project occurs following the certification of the master environmental impact report, and the approval of a project that was not described in the master environmental impact report, may affect the adequacy of the environmental review in the master environmental impact report for any subsequent project.

There is therefore no Master EIR or other EIR which addresses the impacts of planned development of the Planning Area as a whole. For this reason, it is very important that March JPA as both the Lead Agency, and essentially the landowner, not engage in project-splitting/piecemealing when conducting environmental review of development projects within the March JPA designed to achieve the JPA's purposes in redeveloping the Planning Area. The effect of multiple large-scale projects, such as the proposed Project should be addressed in a single EIR, rather than in separate EIRs, as is currently happening with the multiple development projects within the Planning Area that are currently or recently under review. In the absence of a current Master EIR, the March JPA has engaged in improper piecemealing of review within the JPA Planning Area, and the EIR for the proposed Project is an example of this improper piecemealing. The EIR for the proposed Project is thus fundamentally and basically inadequate when it comes to a true understanding of the impacts of the proposed Project and development within the Planning Area.

E. <u>Impermissible Piecemealing of Environmental Review of Current Projects</u> By Essentially the Same Developer and the JPA

Not only has the JPA engaged in improper piecemealing of the environmental review of development projects within the Planning Area as a whole, it has also engaged in improper

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Public Resource Code Section 21157.6. Limitation Period on Use of Environmental Impact Report limits the use of a Master Environmental Impact Report to five years from the date of certification, except under limited conditions.

piecemealing of related and interdependent development projects by essentially the same developer within the Planning Area. As shown the **Table 2**, the JPA is currently processing two projects, which include significant warehouse and distribution facility square footage and is also currently processing the proposed Project, development of an air cargo facility. All three projects are essentially the same applicant, but are being processed via three separate EIRs. (See **Attachment C** for a copy of the NOCs for each project, the title page of each environmental document showing that Dudek is the environmental consultant for all three projects, as well as the Secretary of State's public records for each LLC demonstrating the three LLCs are related). This constitutes impermissible piecemealing. The three interdependent developments, essentially by the same applicant as the proposed Project are described in **Table 2**. The same environmental consultant, Dudek, has prepared the cited environmental documents for each development listed in **Table 2**, as shown in **Attachment C**.

TABLE 2 THREE RELATED PROJECTS CURRENTLY BEING PROCESSED BY THE JPA PROPOSED BY ESSENTIALLY THE SAME APPLICANT

	West Campus Upper Plateau Project	The Proposed Project – Meridian D-1 Gateway Aviation Center	South Campus Specific Plan and Village West Drive Extension Project
SCH#	2021110304	2021040012	2020059028
	https://ceqanet.opr.ca.	https://ceqanet.opr.ca.gov/20	https://ceqanet.opr.ca.gov
	gov/Project/20211103	<u>21040012</u>	/Project/2020059028
	04		
NOC:	https://files.ceganet.o	https://files.ceqanet.opr.ca.go	https://files.ceqanet.opr.c
	pr.ca.gov/274204-	<u>v/268734-</u>	a.gov/261879-
	1/attachment/jdU0-	1/attachment/i2Fc1ozLFVid	2/attachment/aSLfEReDb
	C1cRLxVjUK5fl5iv	K8ARHXvrsP4GVmMQzJB	TJZN4y17Q74AiDNN9
	GsEmedV afQ0mh	M3X8owMIw32gHdYm6ze	PPGKg-
	<u>qnmpvwdxBADTEG</u>	LD23YivN9y26bkRXMJyw	mTU973oSjwZ3ZRyQry
	nDXJQapt2LHyFNF	ma4L7REPgM0	AdTl QPvOghqvLGTG
	EXQZAeYrY7flLTk		COlizAPhde0
	0	1 / m m m = 1	
		Initial Study:	SBE:
	<u>DEIR</u> :	https://files.ceqanet.opr.ca.go	https://ceqanet.opr.ca.gov
	https://ceqanet.opr.ca.	<u>v/268734-</u>	/2020059028/3
	gov/2021110304/2	1/attachment/I51ZYXrrBpR	
		W6jzrmrucVTV3kAIb1NlZ5	
	10,200	Woyl 115yGgWCoRN6M58	
	FEIR		

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	West Campus Upper Plateau Project	The Proposed Project – Meridian D-1 Gateway Aviation Center	South Campus Specific Plan and Village West Drive Extension Projec
	https://ceqanet.opr.ca. gov/2021110304/4	jjjs6AWNj8- ekOjmNSp0k AAHwP0	
		DEIR: https://ceqanet.opr.ca.gov/20 21040012/2	
Applicant	Meridian Park West, LLC, Attn: Timothy Reeves	Meridian Park D-1, LLC	Meridian Park South, LLC
	1156 North Mountain Avenue, Upland, CA 91786	1156 North Mountain Avenue, Upland, CA 91786	1156 N. Mountain Avenue, Upland, CA 90785
NOP Issued:	11/19/2021	4/1/2021	5/18/2020
Includes:	The Project consists of: 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-	The Project consists of two components, the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component would be constructed within approximately 64-acres under March JPA jurisdiction. The Air Cargo Center Component of the Project would include development of an air cargo center, including the construction of an	The proposed Project includes Plot Plan approvals for the following components of the South Campus buildout: development of a Commercial Parcel; construction of 800,000 square-foot Building D; construction of a 6.2-acre Dog Park and Paseo; construction of Gless Ranch Road and Caroline Way; and the extension

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TABLE 2 THREE RELATED PROJECTS CURRENTLY BEING PROCESSED BY THE JPA PROPOSED BY ESSENTIALLY THE SAME APPLICANT

West Campus Upper Plateau Project	The Proposed Project – Meridian D-1 Gateway Aviation Center	South Campus Specific Plan and Village West Drive Extension Project
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		

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Plan Area)

TABLE 2 THREE RELATED PROJECTS CURRENTLY BEING PROCESSED BY THE JPA PROPOSED BY ESSENTIALLY THE SAME APPLICANT

West Campus Upper
Plateau Project
Meridian D-1 Gateway
Aviation Center

West Campus Upper
Plan and Village West
Drive Extension Project

Copies of the NOCs and Corporate filings from the California Secretary of State's website for these three LLCs are provided in **Attachment C** to this letter.

As shown in **Figure 1** below, the proposed Project, the proposed West March Upper Plateau project, and the proposed South Campus Specific Plan and Village West Drive Extension project are located in close proximity to each other and to the airfield.



Figure 1 – Proximity of the Proposed Project to the proposed West March Upper Plateau and South Campus Specific Plan Developments

Source: Google Earth, Figure 3-5 of the DEIR for the West March Upper Plateau, Figure 1 of the Meridian Park D-1 Gateway Aviation Project Initial Study, and Figure 3-4C of the South Campus Specific Plan and Village West Drive Extension DEIR. Figure prepared by Channel Law.

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The DEIR impact analysis clearly lacks the kind of detailed impact analysis of the combined effects of the three developments and the three developments in combination with other past, present and reasonably foreseeable future projects that would occur. A Master EIR for the JPA or a combined EIR for the three developments is clearly required.

March JPA clearly has a goal of promoting the JPA as a civilian air cargo center (see **Attachment A**). To that end, in addition to UPS operations, Amazon Air started operations at March Air Reserve Base in 2018. ¹⁹ Due to the efforts of the March JPA, civilian air cargo operations have increase from very few annual flights to approximately 1,592 flights in 2018 and 3,840 flights in 2019. ²⁰ According to page 16 of the Homestead Air Reserve Base Joint Use Study:

The increased annual civilian operations at March Air Reserve Base and March Inland Port, most recently recorded as 3,840 takeoffs and landings in 2019, will likely continue to boost the facility's economic impact. Its joint use agreement limits civilian airport operations to 21,500 takeoffs and landings, still allowing for significant growth of its civilian operations in the coming years.

Email correspondence with March Inland Port Airport Authority Airport Director, Gary W. Gosliga, dated August 24, 2020.

Communication with March Inland Port Airport Authority Airport Director, Gary W. Gosliga on September 11, 2020.

Clearly the Meridian D-1 Gateway Aviation Center is intended to provide cargo service and increased air cargo access for both the West Campus Upper Plateau Project and the South Campus Specific Plan and Village West Drive Extension Project. Warehouse rents near cargo airports are substantially higher than warehouses that don't have convenient air cargo access, nearly 20 percent higher, ²¹ and there is therefore a benefit to developing warehouse facilities in concert with air cargo facilities. As previously quoted:

Once constructed, the Proposed Project is anticipated to average 17 flights per day, 6 days per week (non-peak). During the peak season (i.e., late November through late December), the Proposed Project is anticipated to

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[&]quot;Amazon Air to start operations at March Air Reserve Base", ABC 7 Eyewitness News, October 10, 2018 https://abc7.com/amazon-air-planes-delivery-operation/4456840/

Homestead Air Reserve Base Joint Use Study, September 18, 2020, Miami-Dade Board of County Commissioners, Office of the Commission Auditor: https://www.miamidade.gov/auditor/library/homestead-air-reserve-base-study.pdf

FreightWaves, "Warehouse rents near cargo airports skyrocket, report says": https://www.freightwaves.com/news/warehouse-rents-near-cargo-airports-skyrocket-report-says

> average 22 flights per day, 6 days per week. Aircraft operations would occur between 7:00 a.m. and 11:00 p.m. (approximately 5% of the proposed aircraft operations would occur between 10:00 p.m. and 11:00 p.m.).

Seventeen flights a day, six days a week, for 11 months²² (4,996 new cargo flights) plus 22 flights per day for one month²³ (528 flights) equals 5,524 new flights a year resulting from the new Aviation Center. This represents more than a doubling of the number of flights in 2019. Each flight includes two operations: an arrival and a departure. This flight schedule thus represents 11,048 one-way air trips. However, Table 2-1: Proposed Aircraft Operations in the DEIR reproduced below, assumes only 10,608 total annual operations:

Table 2-1. Proposed Aircraft Operations

Average Daily Arrivals (Non- Peak)		Dep	Average Daily Departures (Non-Peak)		Daily Arrivals		Average Daily Departures (Peak)		Total Average Daily	Total Average Daily	Total			
D	E	N	D	E	N	D	E	N	D	E	N	Flights ^a (Non-Peak)	Flights ^a (Peak)	Annual Operations ^b
14	3	0	3	12	2°	15	7	0	7	13	2	17	22	10,608

Notes: D = day (7:00 a.m.-7:00 p.m.); E = evening (7:00 p.m.-10:00 p.m.); N = night (10:00 p.m.-11:00 p.m.).

Each flight includes two operations: an arrival and a departure.

The description of flight operations in the DEIR is not accurate, stable or finite. Moreover, it appears that the analysis has been conducted based on fewer annual operations than described elsewhere in the DEIR. Operational impacts have thus been underestimated.

According to UPS Air Cargo, the UPS fleet currently includes the following aircraft types: 757-200F, 767-300F, A300-600F, MD-11F, 747-400F, and 747-8F. UPS serves more than 220 countries using a combination of more than 500 UPS and chartered aircraft. 24 Amazon Air uses Boeing 737 and 767 aircraft, all of which are operated by contract partners. 25 While the

US/aircraft#:~:text=Our%20fleet%20currently%20includes%20the,500%20UPS%20and%20cha rtered%20aircraft.

https://en.wikipedia.org/wiki/Amazon Air#:~:text=Amazon%20Air%20uses%20Boeing%20737 consists%20of%20the%20following%20aircraft.&text=Deliveries%20begin%20late%202023.& text=6%20aircraft%20awaiting%20conversion%20or%20delivery%20to%20operator.

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Operations include counting arrivals and operature.

Operations include counting arrivals and departures eparately; there are two operations (arrival and a departure) for each flight. This represents an overstatement of the average daily nighttime aircraft operations during non-peak hours, which is approximately

²² Assuming 48 weeks January through November.

²³ Assuming 4 weeks in December.

²⁴ https://www.aircargo.ups.com/en-

specific cargo aircraft which will make use of the new Aviation Center is not known, the following table provides an idea of the payload ranges of the likely aircraft:²⁶

		Comparison of cargo air	craft capabilities		
Aircraft +	Volume (m³) ÷	Payload +	Cruise +	Range +	Usage +
Airbus A400M	270	37,000 kg (82,000 lb)	780 km/h (420 kn)	6,390 km (3,450 nmi)	Military
Airbus A300-600F	391.4	48,000 kg (106,000 lb)	-	7,400 km (4,000 nmi)	Commercial
Airbus A330-200F	475	70,000 kg (154,000 lb)	871 km/h (470 kn)	7,400 km (4,000 nmi)	Commercial
Airbus A380 ^[24]	342	68,000 kg (150,000 lb)	871 km/h (470 kn)	13,300 km (8,000 nmi)	Commercial
Airbus Beluga	1210	47,000 kg (104,000 lb)	-	4,632 km (2,500 nmi)	Commercial
Airbus BelugaXL	2615	53,000 kg (117,000 lb)	-	4,074 km (2,200 nmi)	Commercial
Antonov An-124	1028	150,000 kg (331,000 lb)	800 km/h (430 kn)	5,400 km (2,900 nmi)	Both
Antonov An-22	639	80,000 kg (176,000 lb)	740 km/h (400 kn)	10,950 km (5,910 nmi)	Both
Antonov An-225	1300	250,000 kg (551,000 lb)	800 km/h (430 kn)	15,400 km (8,316 nmi)	Commercial
Boeing C-17		77,519 kg (170,900 lb)	830 km/h (450 kn)	4,482 km (2,420 nmi)	Military
Boeing 737-700C	107.6	18,200 kg (40,000 lb)	931 km/h (503 kn)	5,330 km (2,880 nmi)	Commercial
Boeing 757-200F	239	39,780 kg (87,700 lb)	955 km/h (516 kn)	5,834 km (3,150 nmi)	Commercial
Boeing 747-8F	854.5	134,200 kg (295,900 lb)	908 km/h (490 kn)	8,288 km (4,475 nmi)	Commercial
Boeing 747 LCF	1840	83,325 kg (183,700 lb)	878 km/h (474 kn)	7,800 km (4,200 nmi)	Commercial
Boeing 767-300F	438.2	52,700 kg (116,200 lb)	850 km/h (461 kn)	6,025 km (3,225 nmi)	Commercial
Boeing 777F	653	103,000 kg (227,000 lb)	896 km/h (484 kn)	9,070 km (4,900 nmi)	Commercial
Bombardier Dash 8-100	39	4,700 kg (10,400 lb)	491 km/h (265 kn)	2,039 km (1,100 nmi)	Commercial
Lockheed C-5		122,470 kg (270,000 lb)	919 km/h	4,440 km (2,400 nmi)	Military
Lockheed C-130		20,400 kg (45,000 lb)	540 km/h (292 kn)	3,800 km (2,050 nmi)	Military
Douglas DC-10-30		77,000 kg (170,000 lb)	908 km/h (490 kn)	5,790 km (3,127 nmi)	Commercial
McDonnell Douglas MD-11	440	91,670 kg (202,100 lb)	945 km/h (520 kn)	7,320 km (3,950 nmi)	Commercial

According to DEIR page 2-6:

As a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by March JPA for conformance with this EIR; non-conformance may require additional CEQA review.

The DEIR thus concedes that the analysis of impacts such as noise may not be accurate, that impacts may be understated and that additional CEQA analysis may be required in the future. Given that that fleet mix may result in an increase in the significant unavoidable impacts, the EIR must contain a mitigation measure that requires that operations shall not be permitted if impacts are greater than described in the DEIR, unless they can be mitigated to DEIR levels and mandating the needed additional CEQA review in the event that the fleet mix is different than assumed in the DEIR.

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Table source: https://en.wikipedia.org/wiki/Cargo_aircraft

The three proposed projects are thus functionally connected, are by essentially the same developer on land controlled by the JPA, will result in the movement of a significant amount of air cargo, and are being processed concurrently, but separately, using environmental documents prepared by the same consultant. The West March Upper Plateau and South Campus Specific Plan warehouse projects are a reasonably foreseeable consequence of the expansion of air cargo capacity resulting from the Aviation Center Project, and Aviation Center Project is a reasonably foreseeable consequence of the massive proposed expansion in warehouse square footage within the JPA. This is a clear example of impermissible piecemealing and project splitting, and has resulted in an underestimate of impacts. The EIR must therefore be redone and recirculated.

Both the West March Upper Plateau and the South Campus Specific Plan projects are reasonably foreseeable consequences of the Aviation Center Project. Similarly, the Aviation Center Project with expanded air cargo processing capacity is a reasonably foreseeable consequence of the two developments which include substantial new warehousing capacity. The associated future expansion of warehouse development is significant, and changes the scope and nature of the proposed Project's environmental effects.

The Initial Study for the South Campus Specific Plan and Village West Drive Extension Project²⁷ indicates that it has the potential to result in significant impacts in the following issue areas:

- Aesthetics
- Air Quality
- Biological Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology/Water Quality
- Land Use / Planning
- Noise
- Recreation
- Transportation
- Utilities/Service Systems
- Wildfire

In fact, the Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR, page 1-10 indicates that it will result in the following significant unavoidable impacts:

2/attachment/aftIv_v9NPGzNVDbRECEOlTsyKqj2aXukVYQouwcZcVQhD9xTa1SAp0CwHS SdFuulMkyyAsB6pBWWS210

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https://files.ceqanet.opr.ca.gov/261879-

As discussed in Section 4.2, Air Quality, and Section 4.12, Transportation, impacts associated with operational air quality and transportation were identified as being significant and unavoidable. Cumulative impacts associated with operational air quality and transportation were also identified as being significant and unavoidable.

The FEIR for the West March Upper Plateau, which did not include the Proposed Project in its cumulative analysis, indicates that it will result in significant impacts in the following issue areas prior to mitigation: ²⁸

- Aesthetics (AES-1, AES-3 and cumulative)
- Air Quality (AQ-1 construction, AQ-2 construction)
- Biological Resources (BIO-1, BIO-2, BIO-3, BIO-5, cumulative)
- Cultural Resources (CUL-3)
- Geology and Soils (GEO-1, GEO-2, GEO-4)
- Greenhouse Gases (GHG-1, GHG-2, cumulative)
- Hazards and Hazardous Materials (HAZ-1, HAZ-2, HAZ-3, HAZ-4, HAZ-5)
- Hydrology and Water Quality (HYD-1, HYD-3, HYD-4, cumulative)
- Land Use and Planning (LU-1)
- Transportation (TRA-1)
- Public Services (FIRE-2, FIRE-3, FIRE-4, cumulative wildfire)

In addition, the West March Upper Plateau FEIR, which did not include the Proposed Project in its cumulative analysis, indicates that it will result in the following significant unavoidable impacts: ²⁹

As discussed in Section 4.2, Air Quality, impacts associated with operational air quality were identified as being significant and unavoidable. Cumulative impacts associated with operational air quality were also identified as being significant and unavoidable. As discussed in Section 4.4, Cultural Resources, impacts to historical and archaeological resources were identified as being significant and unavoidable. As discussed in Section 4.11, Noise, impacts associated with operational traffic noise were identified as being significant and unavoidable. Additionally, as discussed in Section 4.16, Tribal Cultural Resources, impacts associated with construction would result in significant and unavoidable impacts to tribal cultural resources (TCRs).

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Table 1-2, FEIR for the West March Upper Plateau Project.

West March Upper Plateau FEIR page 1-18.

The DEIR clearly underestimates the combined impacts of the three projects. For example, the Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR identified significant unavoidable cumulative surface traffic impacts as resulting from that development. Cargo from the proposed Project is likely transferred to other nearby warehouses including the South Campus Specific Plan warehouses to be stored, sorted for distribution, and then transported on to final destinations from that warehouse and distribution facility (as well as the West March Upper Plateau warehouse and distribution facilities). However, the DEIR for the proposed Project found that the cumulative surface traffic impacts of the proposed Project were less than significant. Given the existence of significant unavoidable cumulative traffic impacts from a nearby related project, the DEIR for the proposed Project clearly erred in finding that the proposed Project's surface traffic impacts were less than significant and contribution to cumulative traffic impacts was less than cumulatively considerable. The EIR has failed to identify a significant unavoidable project and cumulative impacts and thus must be revised and recirculated. Most of the other cumulative impact judgements are also likely underestimated.

F. <u>Defective Cumulative Impacts Analysis and the Dangers of Improper Piecemealing</u>

Clearly the Meridian D-1 Gateway Aviation Center is intended to provide cargo service and increased air cargo access for both the West March Upper Plateau and the South Campus Specific Plan and Village West Drive Extension Project. The three proposed projects are thus functionally connected, are by essentially the same developer on land largely controlled by the JPA, will result in the movement of a significant amount of air cargo, and are being processed concurrently, but separately, using environmental documents prepared by the same consultant.

As shown in the Attachments to this letter, despite the fact that the three projects are by essentially the same applicant, are functionally related, are largely on JPA land, and began their environmental review by the same consultant within a year of each other, they were analyzed using different cumulative project lists. **Attachment D** contains the cumulative projects list from Section 3.1 of the DEIR for the Meridan D-1 Gateway Aviation Center Project. **Attachment E** contains the cumulative projects list from Section 4.1 of the FEIR for the West March Upper Plateau Project and **Attachment F** contains the cumulative projects list from Section 4.1 of Meridan South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR. As can be seen from a comparison of these lists, there are inconsistencies in the descriptions of these three developments between the EIR narratives and the cumulative projects lists in the EIRs for the other two functionally related developments. In addition, the lists have been inappropriately constrained by distance assumptions.

In addition, the cumulative projects list for the proposed Project also fails to contain a number of cumulative projects included on the cumulative projects list for a nearby warehouse project, the Rider and Patterson Business Center project in the County of Riverside, as shown in **Attachment G**. The Rider and Patterson Business Center would include development of a 591,203 square foot building including 576,603 square feet of warehouse space and a total of 84

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truck docking doors. This development is also clearly intended to make use of proximity of aviation services at the JPA.³⁰

The EIR for the proposed Project clearly fails to include analysis of an appropriate list of cumulative projects in the area. The cumulative analysis must be redone and there needs to be consistency between the cumulative projects lists for functionally related projects within the JPA. More importunately, the JPA needs to prepare one EIR that addresses all of the proposed developments within the JPA and Foreign Trade Zone 244.

The cumulative projects list in the EIR thus fails to include a number of reasonably foreseeable developments which should have been considered in the analysis. In addition, the EIR fails to identify the Project's contribution to cumulative impacts identified as significant in the EIRs for related projects as significant, even when the related projects have identified significant unavoidable cumulative impacts. The cumulative impacts analysis in the DEIR for the proposed Project is thus clearly defective and fails to identify all of the Projects significant cumulative impacts. The DEIR must therefore be corrected and recirculated for public review and comment.

III. 3. DEFECTS IN THE EIR

Setting aside for the moment the fact that the JPA has engaged in impermissible piecemealing, the EIR as a stand-alone document, includes a number of defects sufficient to trigger the need for recirculation of the EIR.

A. Lack of an Accurate, Stable or Finite Project Description

As noted earlier in this comment letter, the EIR lacks an accurate and stable project description.

B. <u>The EIR Contains Mitigation Measures Which Have Not Been Demonstrated</u> <u>To Be Feasible and Inadequate Mitigation</u>

There are a number of mitigation measures which have either not been demonstrated to be feasible, or which are inadequate as written. For example, a number of the mitigation measures require that the Project plans include certain requirements, but there is no requirement that the Project as built contain these features or requirement for demonstration of compliance prior to issuance of the occupancy permit (see for example MM-AQ-2 through AQ-4). Several of the mitigation measures allow the tenant to violate the mitigation "if necessary" or unfeasible (see for example MM-AQ-6A). The potential for impacts thus remains.

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The DEIR for the Rider and Patterson Business Center is available at: https://ceqanet.opr.ca.gov/Project/2022120110

C. <u>Failure to Identify Indirect Impacts Resulting from Project-Induced Growth</u> in Cargo Operations

As previously noted, a "Project" as defined by CEQA is "an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment." The EIR is fatally flawed because it has failed to analyze the indirect impacts of the proposed Project resulting from its facilitation of the growth of warehousing in the area, including the two related projects by essentially the same applicant.

The proposed Project is located within the March JPA Planning Area and March Inland Port Airport ("MIP"), with a joint use military/civilian airfield, which is also within the March Joint Powers Authority General Plan Planning Area. Both the Planning Area and March Inland Port Airport are located within Foreign Trade Zone 244, 32 which "allows U.S.-based companies to defer, reduce, or even eliminate Customs duties on products admitted to the zone." In fact, March JPA with its airfield acts as the heart of the FTZ. 33 The proposed Project is intended to provide expanded cargo operations at MIP airport, and because of this and will clearly facilitate the growth of warehousing in the FTZ area.

March Inland Port Airport "contains a runway with a length of 13,300 feet, which can technically, as well as market wise serve civilian aviation operations, both passenger and air cargo." To facilitate joint use of the airfield, the March Inland Port Airport Authority ("MIPPA") was created by the March JPA in 1996 and formalized through the execution of a joint use agreement with the military ("AFRES") in 1997 to provide for civilian use of the airport facilities. The agreement includes approximately 360 acres for civilian aviation facilities at the southern end of the airfield. In touting the March Inland Port to potential civilian users, the JPA states: 36

The setting of March Inland Port is ideal for many reasons:

https://www.marchipa.com/documents/docs_forms/04292019_FTZ244_Service_Area_Map_w-FTZ_header.pdf

https://marchjpa.com/march-inland-port-airport/formation-of-mipaa/

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³¹ (PRC § 21065.)

For a map of the FTZ see:

https://marchipa.com/foreign-trade-zones/

³⁴ General Plan, page 1-6

See: https://marchipa.com/march-inland-port-airport/

https://marchjpa.com/march-inland-port-airport/formation-of-mipaa/

Airfield is located in one of the fastest growing regions of the United States.

MIP is accessible to four major freeways.

Access to MIP has been upgraded from Interstate 215, as a High Priority Project through TEA-21. This \$9 million ground access project was completed in mid-2000 and was further improved in 2015.

The regional location of March has been planned and developed to assure land use compatibility with the operation of March Airfield.

As a joint use facility, operational costs are highly competitive.

As noted on General Plan page 1-8: "The unique opportunity of a joint use airfield with the AFRES will shape the type of industry and commerce attracted to the March JPA Planning Area." In fact, Goal 7 of the General Plan Land Use Element is to: "Maximize the development potential as a regional Intermodal Transportation facility to support both passenger and freight-related air services." To that end, General Plan Land Use Element Policy 7.7 is to: "Encourage commerce and industry that are complementary to the joint use of the airfield." Furthermore, Policy 7.8 is to: "Plan for uses which support and contribute to the establishment and development of commercial aviation." The EIR is therefore required to analyze the proposed Project's indirect impacts resulting from its inducement of the growth of warehousing facilities within the JPA and is the FTZ.

As previously discussed, all of the prior environmental documents and studies for the JPA are 24 or more years old. ³⁷ The EIR for the proposed Project therefore needed to analyze not just impacts associated with the growth in air traffic associated with the proposed Project, but also the growth in surface traffic induced by the proposed Project. It also needed to analyze all of the indirect impacts resulting from air cargo expansion, such as two related projects which are designed to serve the demand for air cargo facilities created by the proposed Project. These are not only reasonably foreseeable, they are a known consequence of the proposed Project's increase in air cargo capacity.

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0-3.34

See also: https://marchjpa.com/documents-forms/

CEQA Guidelines, § 15064, subd. (d) requires:

15064. DETERMINING THE SIGNIFICANCE OF THE ENVIRONMENTAL EFFECTS CAUSED BY A PROJECT

(d) In evaluating the significance of the environmental effect of a project, the Lead Agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.

As explained by CEQA Guidelines Section 15358:

15358. EFFECTS

"Effects" and "impacts" as used in these Guidelines are synonymous.

- (a) Effects include:
 - (1) Direct or primary effects which are caused by the project and occur at the same time and place.
 - (2) Indirect or secondary effects which are caused by the project and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect or secondary effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems.
- (b) Effects analyzed under CEQA must be related to a physical change.

Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21068 and 21100, Public Resources Code.

The JPA was clearly required to analyzed the indirect impacts of the proposed Project, including the reasonably foreseeable indirect impacts resulting from the two related warehousing projects. This requirement is consistent with the principle set forth by the court in *Laurel Heights* that an EIR must include an analysis of a future project or expansion if "(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will be significant in that it will likely change the scope or nature of the initial project or its environmental effects." (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396).

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D. Inadequate Cumulative Impacts Analysis

As previously discussed, the cumulative impacts analysis in the EIR is inadequate. It would be helpful if Table 3-1- Cumulative Projects included the State Clearinghouse Numbers for the different developments as it is difficult to validate the list, based on the project names or numbers.

E. Inadequate Growth Inducting Impacts Analysis

CEQA Guidelines §15126.2(e) requires that an EIR include discussion of the growth-inducing impacts of a project:

(e) Growth-Inducing Impact of the Proposed Project. Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

However, DEIR page 4.5 – Growth-Inducing Impacts completely ignores the fact that the proposed Project is designed to expand air cargo infrastructure in the region, stating on DEIR page 4-13:

Indirect growth can also occur by a project installing infrastructure that can support further growth. The project site is served by existing public services and utilities, and no new off-site utility systems would be needed to serve the Proposed Project. As discussed in Chapter 2, Project Description, of this EIR, the Proposed Project would include construction of a 225-foot right-turn pocket into the existing access roadway along the southbound side of Heacock Street and installation of a traffic signal at the existing access roadway. These improvements would not represent the installation of new infrastructure, but the improvement of existing infrastructure. Therefore, indirect growth inducement as a result of the extension of these facilities into a new area would not occur.

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The DEIR thus completely ignores the fact that the proposed Project represents an expansion of air cargo air operations and facilities within the FTZ. The DEIR has failed to assess the growth-inducing impact of this expansion on the damand for additional warehouse and distribution center development within the FTZ. The DEIR is thus fatally flawed.

IV. CONCLUSION

As detailed in this comment letter, the EIR for the proposed Project contains significant defects. These must be corrected and the EIR recirculated pursuant to CEQA Guidelines Section 15088.5(a)(1), (2) and (4).

Please keep this office on the list of interested persons to receive timely advance notice of all hearings, votes and determinations related to the Project, its DEIR and requested entitlements. Pursuant to Public Resources Code Section 21167(f), please provide us with a copy of each and every Notice of Determination issued in connection with the Project.

We adopt and incorporate by reference all Project comments and objections raised by all others during the environmental review and land use entitlement processes for the Project. Pursuant to PRC Section 21167.6(e) and Consolidated brig. Dist. v. Superior Court, 205 Cal. App. 4th 697 (2012), please include all of the hyperlinked references cited in each of the comment letters submitted during the administrative process in the administrative record.

Sincerely

Jamie T. Hall

Encls

Attachment A: Cumulative Projects List for the Proposed Project (West Campus Upper Plateau Project)

Attachment B: Cumulative Projects List for the Meridian D-1 Gateway Aviation Center Project

Attachment B: Cumulative Projects List for the Meridian D-1 Gateway Aviation Center Project Draft EIR

Attachment C: Cumulative Projects List for the Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR

Attachment D: Cumulative Projects List For The Meridan D-1 Gateway Aviation Center Project

Attachment E: Cumulative Projects For The West March Upper Plateau Project

Attachment F: Cumulative Projects List For In The Meridan South Campus Specific Plan And Village West Drive Extension Draft Subsequent EIR

Attachment G: Cumulative Projects List from the Rider and Patterson Business Center DEIR

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Channel Law Group, LLP

Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH#: 2021040012)

July 22, 2024

ATTACHMENT A

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ATTACHMENT A MARCH JPA

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History of March Joint Powers Authority

March Air Force Base (AFB), California, a military installation in use almost continually since 1918, served as an active duty aerial refueling and deployment base, and encompassed approximately 6,500 acres. Recommended for realignment by BRAC in 1993, March AFB converted to March Air Reserve Base (ARB) on April 1, 1996, resulting in the surplusing of approximately 4,400 acres of property and a number of buildings. Base realignment resulted in a significant impact to the local economy. The impacts are measured in direct loss of military and civilian jobs, loss of contract spending by the base, and loss of indirect economic activity as a result of the changes. Prior to realignment, the base employed more than 9,000 military personnel and civilian employees. The existence of the base in its pre-realignment condition contributed an estimated \$500 million annually to the regional economy.

The March Joint Powers Authority (JPA), formed in 1993 and is charged with the responsibility of base reuse, planning, and development, including establishing a joint-use aviation facility. While base realignment and the associated loss to the region came at an inopportune time, the opportunities relative to the planning and implementation of new uses and providing for unmet needs of the region have arisen. The March JPA is planning and implementing new uses for currently vacant lands, reuse of existing facilities, and joint use of the airfield facilities for the development of an air cargo facility. Overall, long-term economic gains in the form of developing a civilian air cargo center and the growth and development of an employment center to account for 38,000 jobs are projected.

History of March Air Force Base

Located within the western Riverside County region of Southern California, March Air Force

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Located within the western Riverside County region of Southern California, March Air Force Base (AFB) encompassed approximately 6,500 acres straddling Interstate 215 (Highway 395) just south of Highway 60. March AFB was first established as a military installation in 1918, and has operated almost continually since. 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. The decision to realign March AFB resulted in approximately 4,400 acres of property and facilities being declared surplus and available for disposal actions, as well as joint use of the airfield.

Prior to base realignment, the base employed over 10,000 military personnel and civilian employees. The existence of the base in its pre-realignment condition contributed an estimated \$500 million annually to the regional economy. With the announcement of realignment, the regional economic loss with the change in military mission at March was immediately recognized. While base realignment and the associated loss to the region came at an inopportune time, the opportunities relative to the planning and implementation of new uses and providing for unmet needs of the region have arisen.

The March JPA is planning and implementing new uses for currently vacant lands, reuse of existing facilities, and joint use of the airfield facilities for the development of an air cargo facility. In short, long-term economic gains in the form of developing a civilian air cargo center, and the growth and development of an employment center to account for 38,000 jobs, are projected.

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DATE	MILESTONE
1917	As World War I dragged on, stalemated by trench warfare, the U.S. government determined to restore the initiative by gaining aerial supremacy. The establishment of nearly two dozen additional training fields during 1917 was capped by the activation of a field that was later to become March Field.
1918	On February 7, 1918, the War Department accepted the Alessandro Aviation Field site as an aviation training camp, consisting of 640 acres plus three nearby sites of 160 acres each. Original lease was for five months and thirteen days at a cost of \$1 with an option for renewal and purchase. The Riverside Chamber of Commerce carried a \$64,000 bond to guarantee the cost. This barley field alongside the railroad and the Alessandro station had been used since the fall of 1917 as a cross-country stop for aviators from Rockwell Field, San Diego, where they shared a station with the U.S. Navy on an island now called Coronado Naval Station. On February 16, Sergeant Garlick and three other enlisted men arrived by truck with tents, cookstove, provisions, and fuel. The first official landing was by Cadet Harold Compare on March 1. On March 11, Captain William Carruthers relieved Sgt. Garlick as commander of the 818th Aero Squadron.

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	On March 20, the field was renamed in honor of Lt. Peyton C. March, an aviator who died in Texas from injuries suffered in an aircraft crash.
	The first cadets arrived in April and their 96 planes, unassembled Curtiss JN-4D "Jennys," were put together by the cadets and housed in 12 wood and tarpaper hangars.
	In July, cadets in the first class to graduate were commissioned "2nd Lt." and sent to Kelly Field, Texas for advanced training.
	When the Armistice came in November, the cadets had recorded 35,468 flying hours, with 185 cadets earning their wings.
1919	In May, 1919, the Federal government purchased the field and it became a permanent base. A primary flight school was in operation until 1921 when training was discontinued. This was followed in 1922 when the base was reduced to caretaker status and was closed in 1926.
1927	1927 marked the reactivation of March as a primary training base, and permanent construction of "Spanish Mission" architecture was authorized.
1931	It became a tactical base in 1931 with the 7th Bombardment Group and the 17th Pursuit Group, both in the 1st Bombardment wing. Being near the aircraft industrial center of Los Angeles, many planes were test-flown from March by famous flyers, both civilian and military. Much of this activity was due to the inspired leadership of "Hap" Arnold, the base commander from 1931 to 1936.
1942	With the attack on Pearl Harbor, March entered its third training era, with the B-17 and later the B-24 heavy bombers. The base doubled in area and supported 75,000 troops.
1946	The Tactical Air Command took over control, and the 12th Air Force was assigned with P-80 jet-equipped fighter groups.
1947	When the U.S. Air Force was activated in 1947, March Field became March Air Force Base.
1949	The Strategic Air Command came in 1949 when the 15th Air Force and the 22nd Bomb Group with B-29s arrived.
1953	In 1953, the 22nd Bomb Group was converted to B-47s ,and the 22nd Air Refueling Squadron was activated with KC-97s.
1960	Air Force Reserve units were assigned in 1960 to carry out rescue and troop carrier missions.

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	MARCH JOINT POWERS AUTHORITY "BRINGING GOOD JOBS TO RIVERSIDE COUNTY"
	ABOUT V DEVELOPMENT SERVICES V MARCH INLAND PORT AIRPORT V
	COMMUNITY V
	f in @
1992	Communities generate support to keep MAFB open and make their position to the public and the BRAC Commission.
1993	Command was transferred from the Strategic Air Command to the Air Mobility Command, and the 15th
	AF moved to Travis AFB.In June, the Base Realignment and Closure (BRAC) Commission recommended that March AFB be included in the "third round" (BRAC 3) of military base closures or
	realignments. The recommendation was approved by the President in July. Air Force Reserve and Air
	National Guard units remained at March AFB and the base was redesignated "March Air Reserve Base
	The Base decreased to approximately 1/3 of its previous size.
	Resolutions from Riverside County and the cities of Perris, Moreno Valley, and Riverside formed the
	March Joint Powers Authority in September.
1994	In January the Joint Powers Commission set policies, hired initial staff, procured first grant from the
	Office of Economic Adjustment, and initiated the base reuse planning process.In May, the Air Force
	published a listing of properties that were excess to its needs in the Federal Register; other agencies have the opportunity to "claim" for their use.
	The first draft MAFB Master Reuse Plan was completed to include Land Use and Circulation sections;
	used as preferred alternative for EIS in September.
	Assembly Bill 3769 was passed by the California Legislature, granting special authority to permit the
	development of the base in September.
	In December, the JPA submitted a request to the Secretary of Defense to conduct homeless assistance
	screening and planning under new legislation.
1995	The JPA adopted the Homeless Assistance Plan in December. The JPA and the Air Force agreed to
	terms on a number of interim leases, and the JPA sub-leased the facilities to tenants.

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feasibility analyses to examine the potential of establishing a redevelopment agency. The Air Force issued the Final Environmental Impact Statement (FEIS) in March. In July, Certification of Final Environmental Impact Report (FEIR), and adoption of March JPA Redevelopment Agency Project Area & Plan. The National Park Service approved the JPA's application for a no-cost conveyance of the March AFB Golf Course in December. 1997 The JPA assumed land use control for all surplus property, and the JPA staff began the process of completing the California General Plan in January. In May, The Air Force and the JPA formally signed a "Joint Use Agreement" for the shared use of the airfield facilities. The Air Force signed the first Partial "Record of Decision" (ROD) designating the final cantonment area boundaries and the properties to be designated as "airport related" in a future conveyance. The Federal Aviation Administration approved the JPA's public benefit conveyance application for the "airport related" properties in June. TBD The Air Force conveyed property to new owners per the multiple ROD. March AFB is an Air Mobility Command facility, and the home of the 163rd Air Refueling Wing and the Today 452nd Air Mobility Wing. The KC-10 operates from March, as well as the reserve-flown C-141 and the KC-135 flown by the Guard. U.S. Customs maintains a fleet of smaller planes including two Blackhawk helicopters in their efforts against drug delivery.



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Fri: Closed

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The March JPA, in addition to being designated as the federally recognized reuse authority for the former active duty base, has also assumed other responsibilities. These authorities include:

California Redevelopment Agency

The March Joint Powers Redevelopment Agency was established with the formation of the March AFB Redevelopment Project Area, which includes the entire 6,500-acre former active duty base area, and approximately 450 acres adjacent to the base in the industrial area of the City of Moreno Valley.

Land Use Authority

On March 11, 1997, land use authority was transferred to March JPA from the County of Riverside. The March JPA has adopted development and building codes and standards. The March JPA General Plan has been developed by the March JPA in accordance with state statutes, as well as the associated Master Environmental Impact Report. The March JPA General Plan is designed to implement the March Final Reuse Plan and related activities.

Airport Authority

March Inland Port Airport Authority (MIPAA), is a governing body under the governance umbrella of the March JPA. MIPAA is responsible for the development and operation of the March Inland Port (MIP), a joint-use aviation facility targeted for air cargo operations.

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With realignment, the AFRES reduced the annual number of military operations at March ARB to 51,426. Projected civilian (air cargo) operations capacity, under the current State Implementation Plan (SIP), is denoted in the table below.

	1999	2000	2001	2005	2007	2008	2010	
TOTAL	6,788	9,053	12,774	17,156	18,581	19,808	21,001	

Currently, MIP realizes less than 4,000 operations per year. Airspace at MIP is unconstrained due to location of other airports, and orientation of Runway 14/32 with respect to flight tracks and patterns. Furthermore, MIP is in the Hemet Sector of the Southern California TRACON, which can handle 25-30 IFR flights per hour.

Southern California Air Cargo Demand

Compared to past years when air cargo was carried primarily in the belly holds of passenger aircraft, most regional air cargo is now transported by dedicated all- cargo freighters. Cargo carried by freighter is estimated to range from about 60% to 64%, depending on the season. MIP has the capability and facilities to accommodate cargo operations. The vast growth in warehouse/distribution facilities in Riverside County, primarily the Cities of Moreno Valley and Perris, proved to make MIP a viable goods movement facility for import/export businesses coming to the region, especially those within the March JPA Foreign Trade Zone.

International air cargo handling capacity in the region is a particular problem. Delays during peak periods are continuing to mount at LAX, mainly because of a shortage of ramp space, on-airport warehouse space, and peak-period lift capacity. Even with substantial improvements assumed to be made pursuant to the ongoing LAX Master Plan Study, it is highly doubtful that LAX and highways will handle the tremendous growth in international air cargo volume that is forecast over the next twenty years, most of which growth will come from the Inland Empire.

Many existing air carrier airports lack the space to accommodate the extensive warehousing, manufacturing, and intermodal facilities that are associated with state-of-the-art cargo-handling airports. MIP has the land and ability to construct high-tech manufacturing/distribution centers with intermodal capabilities, or "inland port."

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MIPAA was formed by the March JPA in 1996 for the purpose of creating a public use airport. This airport is being created as a joint use facility in cooperation with the U.S. Air Force Reserve Command at March Air Reserve Base in Riverside County, California. MIPAA is responsible for the development and operations of the "Public Use" airport.

Joint Use Airport

When March AFB was announced for realignment in 1993, one of the first actions of the DOD was to offer the formation of a public "joint use airport." The Air Force defines a "joint use airport" as one where the facilities which are owned and operated by the Air Force are made available for use by civil aviation. Approximately 360 acres east and west of the main runway are available for "airport related uses" as a result of the alignment of March Air Force Base in 1996.

MIP is a joint use aviation that shares essential aviation facilities with the Air Force Reserves. These facilities include the control towers, taxiways, navaids, and runways, as well as maintenance of facilities. At 13,300 feet, Runway 14-32 is one of the longest civilian runways on the west coast. Given the runway data for this facility, all freighter aircraft (including 747-400 and AN 124) can depart fully loaded under most conditions. The facility is ideal to serve commercial air cargo freighters that generally operate heavy loads for long stage lengths. The airfield is in compliance with FAA design standards as detailed in FAA Advisory Circular 150/5300-13 (Change 4 Airport Design) and Federal Aviation Regulations Part 77 Objects Affecting Navigable Airspace.

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On May 7, 1997, a joint use agreement was entered into by the DOD and March Joint Powers Authority (JPA). The JPA is the recognized local reuse agency charged with planning for the economic redevelopment of surplus properties at the base. Under the agreement, the civilian (JPA) and the military (AFRC) entities share essential aviation



March AFB Master Reuse Plan and EIS – The Base Reuse Plan designates approximately 360 acres of land for civilian aviation facilities at the southern end of the airfield at March. The EIS evaluated the environmental elements of the reuse plan and alternatives in accordance with NEPA.

Facilities - Setting - Description

March Inland Port consists of very desirable elements, as well as an ideal setting both in terms of aviation and physical location.

March Inland Port consists of the following key aviation elements:

The longest runway in California at 13,300 lineal feet.

Index E Fire Fighting Capacity Fire Station.

An operational airfield with a fully manned control tower.

Airspace is non-congested, as no arrival or departure routes are "shared" by other airports within the Southern California region. This also holds true for the NAVAIDs, which utilize the Homeland VOR.

Airfield is close to all airways.

New Jet-A and AVGAS fuel facility

Land side, MIP contains more than one million (1,000,000) square feet of ramp area that is stressed to accommodate aircraft up to 900,000 pounds.

Million Air FBO services from a brand new executive terminal (2015).

The setting of March Inland Port is ideal for many reasons:

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Airfield is located in one of the fastest growing regions of the United States. MIP is accessible to four major freeways.

Access to MIP has been upgraded from Interstate 215, as a High Priority Project through TEA-21. This \$9 million ground access project was completed in mid-2000 and was further improved in 2015.

The regional location of March has been planned and developed to assure land use compatibility with the operation of March Airfield.

As a joint use facility, operational costs are highly competitive

March JPA has streamlined the way to do business in California. March JPA has land use authority, and is responsible for all entitlements, building permits, and clearances. Furthermore, the March JPA formed a California Redevelopment Agency and project area to assist with development of MIP. This means that all business dealings at MIP are conducted with "one" cohesive legislative group. All aviation criteria and regulations have been satisfied, and MIP is open for public use.

More than \$28 million in federal funds have been granted to MIP. MIP is designated as a "Reliever Airport" in the FAA's National Plan of Integrated Airports System (NPIAS) which makes MIP eligible for such funds. The funds are necessary for airport infrastructure project that either rehabilitate existing infrastructure or construction of new infrastructure to support civil aviation.

MIP is adjacent to Interstate 215, which links with Interstate 15 approximately 22 miles to the south, to serve the San Diego market. The airport is 3 miles south of Highway 60, which links with Interstate 10 approximately 13 miles to the east. Access to MIP is via the Harley Knox Blvd. exit at I-215.



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The March JPA along with the U.S. Air Force pursued the establishment of March Air Field as a public joint use airport. The Air Force defines a "joint use airport" as one where the facilities which are owned and operated by the Air Force are made available for use by civil aviation. A joint use agreement between these parties was executed May 7, 1997, along with land leases for over 350 acres, as the civilian airport name March Inland Port.

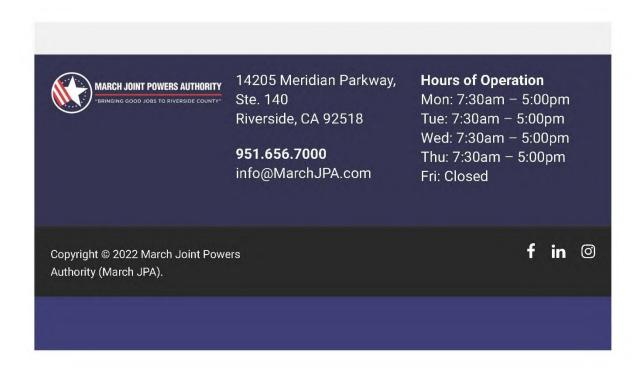
The MIP is the civilian facility that is managed and operated by the MIP Airport Authority (MIPAA). With premier aviation facilities, MIP can accommodate the largest of air cargo and passenger aircraft.

March Inland Port boasts an operational airfield, with a 13,300 lineal foot runway and fully manned control tower. With more than one million square feet of ramp area fully stressed to accommodate aircraft up to 900,000 pounds, the MIP has more than 350 acres of runway-accessible property available for development. Airport fees for aviation operations and service vendors are some of the lowest in Southern California. MIP is a public use airport accessible to commercial and general aviation. For recreational and corporate aircraft operators, MIP has a fully functioning world-class Fix Based Operator (FBO) – Million Air.

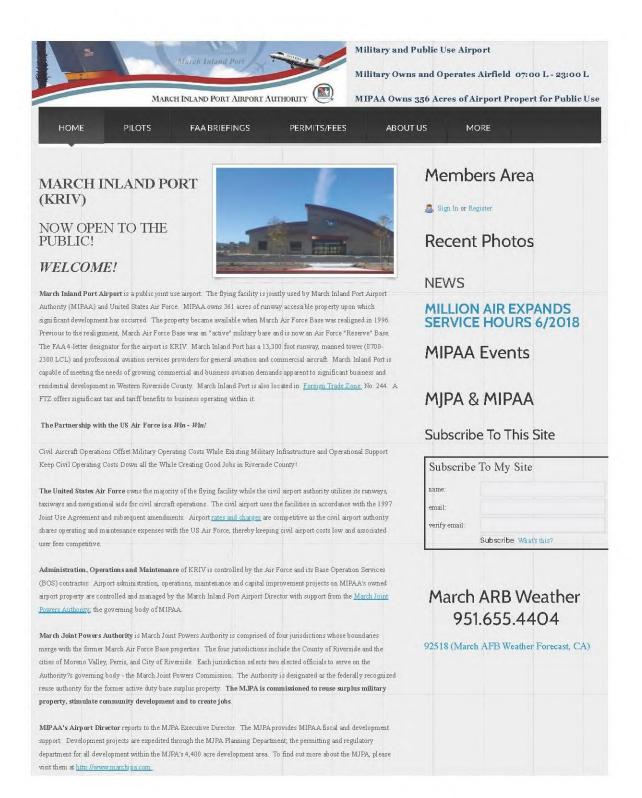
March Inland Port Airport Links

Formation of MIPAA
Operations
Foreign Trade Zones
Conducting Business at MIPAA
Noise Disturbance Form
Airport Documents and Forms

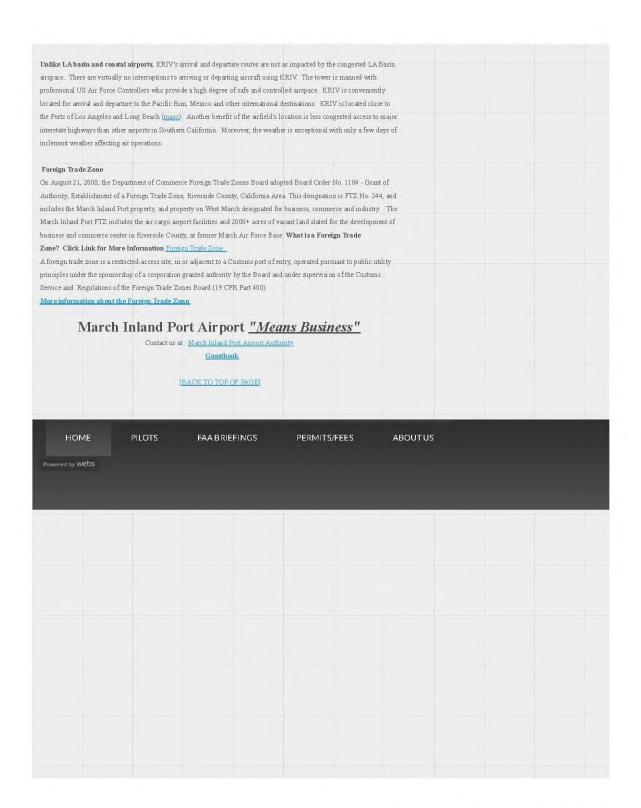
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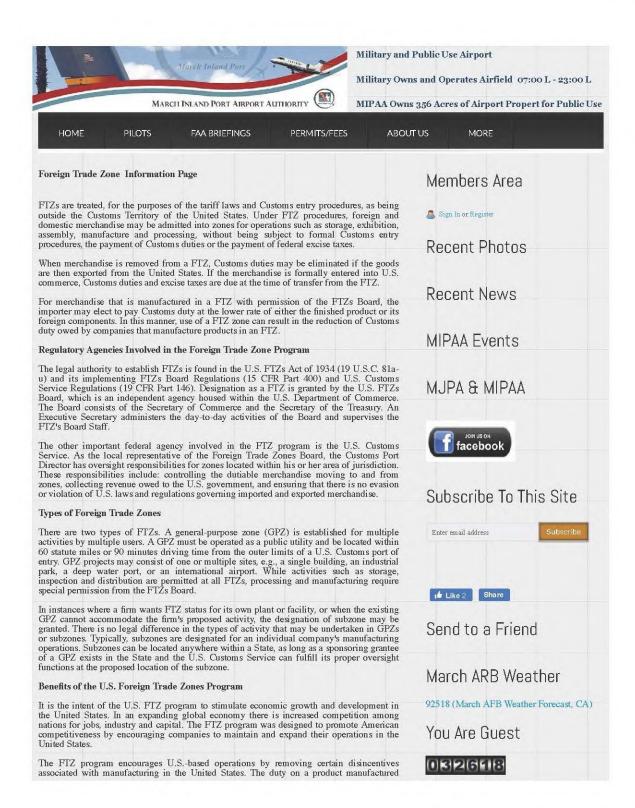
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abroad and imported into the U.S. is paid at the rate of the finished product rather than that of the individual parts, materials or components of the product. A U.S.-based company finds itself at a disadvantage vis-à-vis its foreign competitor when it must pay the higher rate on parts, materials or components imported for use in the manufacturing process. The FTZ program corrects this imbalance by treating a product made in a U.S. FTZ, for purposes of tariff assessment, as if it were produced abroad.

Benefits for the Community

When companies are persuaded that they can increase their cash flow, save taxes and improve their bottom line by locating their operations in U.S. FTZs, communities benefit in several important ways. Economic growth and development are stimulated because jobs are retained and created in the community. The FTZ program impacts indirect employment as well, because a business location not only creates jobs specific to itself, but also creates opportunities for suppliers and service providers in the community. An FTZ project can be a valuable asset when a community is trying to attract new business investment to its area. Finally, a community with a FTZ may experience an improved infrastructure and expanded tax-base as a result of higher employment and the influx of new businesses. For all of these reasons, more than 200 communities throughout the United States support and rely on the benefits that the FTZ program offers public as well as private entities.

Approved General-Purpose Zones and Subzones

For U.S.-based companies involved in international trade, the FTZ program provides a means of improving their competitive position vis-à-vis their counterparts abroad. The fundamental benefit offered by the FTZ program to U.S.-based companies is the ability to defer, reduce or even eliminate Customs duties on products admitted to the zone.

Customs duties are paid only when and if merchandise is transferred into U.S. Customs territory. This benefit equates to a cash flow savings that allows companies to keep critical funds accessible for their operating needs while the merchandise remains in the zone. There is no time limit on the length of time that merchandise can remain in a zone.

In a FTZ, with the permission of the FTZs Board, users are allowed to elect a zone status on merchandise admitted to the zone. This zone status determines the duty rate that will be applied to foreign merchandise if it is eventually entered into U.S. commerce from the FTZ. applied to folding metchands in it is eventually entered into 0.5. Commerce into the FTZ.

This process allows users to elect the lower duty rate of that applicable to either the foreign inputs or the finished product manufactured in the zone. If the rate on the foreign inputs admitted to the zone is higher that the rate applied to the finished product, the FTZ user may choose the finished product rate, thereby reducing the amount of Customs duty owed.

Elimination of Duties:

No Customs duties are paid on merchandise exported from a FTZ. Therefore, duty is eliminated on foreign merchandise admitted to the zone but eventually exported from the FTZ. Generally, Customs duties are also eliminated for merchandise that is scrapped, wasted, destroyed or consumed in a zone.

Miscellaneous Benefits

Elimination of Drawback:

In some instances, Customs duties previously paid on exported merchandise may be refunded through a process called drawback. The drawback law has become increasingly complex and expensive to administer. Through the use of a FTZ, the need for drawback may be eliminated allowing these funds to remain in the operating capital of the company.

Labor, Overhead and Profit:

In calculating the dutiable value on foreign merchandise removed from a zone, zone users are authorized to exclude zone costs of processing or fabrication, general expenses and profit. Therefore, Customs duties are not owed on labor, overhead and profit attributed to production in a FTZ.

By federal statute, tangible personal property imported from outside the U.S. and held in a zone, as well as that produced in the U.S. and held in a zone for exportation, are not subject to State and local ad valorem taxes.

Quotas:
U.S. quota restrictions do not apply to merchandise admitted to zones, although quotas will apply if and when the merchandise is subsequently entered into U.S. commerce. Merchandise subject to quota, with the permission of the FTZs Board, may be substantially transformed in a FTZ to a non-quota article that may then be entered into U.S. Customs territory, free of quota restrictions. Quota merchandise may be stored in a FTZ so that when the quota opens, the merchandise may be immediately shipped into U.S. Customs territory.

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Zone-to-Zone Transfer:

An increasing number of firms are making use of the ability to transfer merchandise from one zone to another. Because the merchandise is transported in-bond, Customs duty may be deferred until the product is removed from the final zone for entry into the U.S. Customs territory.

Other

Additional benefits, sometimes referred to as intangible benefits, have begun to play a greater role in a company's evaluation of the FTZ program. Many companies in FTZs find that their inventory control systems run more efficiently, increasing their competitiveness. FTZ users also find that in meeting their FTZ reporting responsibilities to the U.S. government, they are eligible to take advantage of special Customs procedures such as direct delivery and weekly entry. These procedures expedite the movement of cargo, thereby supporting just-in-time inventory methodologies.

March Receives Foreign Trade Zone Status - Article

Redevelopment efforts at March Air Reserve Base received a major boost Tuesday when the federal government agreed to establish a 2,480-acre foreign trade zone on the site of the downsized military base, as Foreign Trade Zone No. 244. The federal designation will allow businesses located within the trade zone to avoid or defer paying customs duties on products shipped to the base from overseas. Foreign trade zones are considered prime assets in the race to attract large manufacturing and distribution businesses.

Initially, the zone will be used by Philips Consumer Electronics, which recently moved into a new \$7 million warehouse at March. But officials say they are confident that the trade-zone designation will help attract even more companies that do business overseas. "It really heightens our ability to market March," said Riverside Mayor Ron Loveridge, a commissioner with the March Joint Powers Authority, a government agency that guides reuse efforts at the base. "It increases the hand we can play in attracting new businesses."

The foreign trade zone concept, created by Congress in 1934, is designed to help U.S. businesses compete with foreign companies. The trade zones allow manufacturing and warehousing operations to be set up in the United States without being subject to U.S. Customs laws. Companies benefit from this by avoiding tariffs on imported products or delaying such payments until the final product is shipped to a domestic buyer. Products that are sent out of the country pay no tariff at all.

Nationwide, there are now 244 federally-designated foreign trade zones and more than 400 smaller sub-zones. Their primary role is to keep businesses and jobs from fleeing to other countries. "The basic idea is to encourage domestic economic activity that, for tariff or logistical reasons, might otherwise be most cost effectively done overseas," said Greg Jones, an Alabama trade consultant and former president of the National Association of Foreign Trade Zones.

"It's a way to help U.S.-based operations adjust to a changing trade environment," Jones said.

In Southern California, full-scale trade zones are located at the ports of Los Angeles and Long Beach, as well as at Palm Springs International Airport and along the Mexican border in San Diego. Smaller sub-zones are located at Ontario International Airport and San Bernardino International Airport, among other sites. The U.S. Department of Commerce awards foreign trade zone designations, but many of them never get off the ground. In 1998, for instance, only 145 zones were actively importing products from overseas. Locally, the trade zones located in San Bernardino and Palm Springs have yet to attract any businesses capable benefiting from the designation. But officials from both airports say they are optimistic about their prospects.

In 1998, the most recent year that data is available, the nation's 145 active foreign trade zones imported \$157 billion worth of goods, most of which were later distributed within the United States. About \$17 billion of goods were re-exported to other nations, according to the Commerce Department.

HOME PILOTS FAA BRIEFINGS PERMITS/FEES ABOUT US

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Channel Law Group, LLP

Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH#: 2021040012)

July 22, 2024

ATTACHMENT B

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Search Results

Start Range 1999-01-01

Lead/Public Agency March Joint Powers Authority

Edit Search

Download CSV

177 document(s) found

SCH Number	Туре	Lead/Public Agency	Received	Title
2009071069	NOE	March Joint Powers Authority	7/18/2023	Substantial Conformance Determination for a Car Wash Use Within the Commercial Zoning District in the Meridian Specific Plan (SP-5 A5) Area
2023060739	MND	March Joint Powers Authority	6/28/2023	Meridian Storm Drain Pipeline Extension Project
2008071021	NOE	March Joint Powers Authority	6/19/2023	Authorize the Executive Director to take any and all action necessary to confirm the March JPA's ownership of the former Signature Healthcare Property
2008071021	NOD	March Joint Powers Authority	4/26/2023	Fourth Amendment to March LifeCare Campus Disposition and Development Agreement ("Fourth Amendment to the DDA")
2023040073	NOE	March Joint Powers Authority	4/4/2023	*PROJECT WITHDRAWN PER LEAD* Demolition of Abandoned Security Police Kennel Support Facility

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2021110304 EIR	March Joint Powers Authority	1/10/2023	West Campus Upper Plateau Project
2020059028 NOD	March Joint Powers Authority	12/20/2022	South Campus Buildings F and G Project
2002071089 NOD	March Joint Powers Authority	12/19/2022	Conditional Use Permit 22-02 (CUP 22-02) – Allow the Sale of Alcoholic Beverages for On-Site Consumption of Beer and Wine
2020059028 NOE	March Joint Powers Authority	11/9/2022	Design Plan 22-06: South Campus Buildings H and I Warehouse Project
2020059028 NOE	March Joint Powers Authority	10/27/2022	Meridian South Buildings 1-3
2022100592 NOE	March Joint Powers Authority	10/27/2022	Amended lease between the March Joint Powers Authority and the County of Riverside
2022100591 NOE	March Joint Powers Authority	10/27/2022	West March Disposition and Development Agreement, Amendment No. 2
2016061020 NOD	March Joint Powers Authority	10/26/2022	Meridian West – Building 4 Industrial Warehouse Building Project: Plot Plan 22-01 (PP 22-01)
2022090637 NOE	March Joint Powers Authority	9/30/2022	Memorandum of Understanding between the March Joint Powers Authority and Meridian Park LLC for the Perris Valley Flood Control and Drainage Project, Lateral B
2022080226 NOE	March Joint Powers Authority	8/10/2022	Grant of Temporary Construction Easements and Permanent Access, Pipeline and Tunnel Easements to the Metropolitan Water District (MWD)
2016081061 NOE	March Joint Powers Authority	8/10/2022	Veterans Industrial Park (VIP) 215 Project - Final Map 37220
2020059028 NOE	March Joint Powers Authority	8/8/2022	Design Plan 22-05: South Campus Building E

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2009071069	NOE	March Joint Powers Authority	7/14/2022	Determination of Substantial Conformance 4, for a Minor Modification to the Approved Greens Group / Veterans Plaza Commercial Center – Plot Plan PP16-02
2022060180	NOE	March Joint Powers Authority	6/8/2022	Grant of Easement to Southern California Edison - Installation of Infrastructure Improvements for the Implementation of the AT&T Tower at March Field Air Museum
2002071089	NOD	March Joint Powers Authority	6/3/2022	Meridian Conservation Easement NOV Restoration (Lake and Streambed Alteration Agreement EPIMS Notification No. RIV- 19057-R6)
2008071021	NOD	March Joint Powers Authority	2/2/2022	Third Amendment to March LifeCare Campus Disposition and Development Agreement ("Third Amendment to the DDA")
2021120547	NOE	March Joint Powers Authority	12/22/2021	Cooperative Reimbursement Agreement between the March Join Powers Authority, March Inland Port Airport Authority and Riverside County Flood Control District
2021120453	NOE	March Joint Powers Authority	12/20/2021	PP 18-04
2008071021	NOD	March Joint Powers Authority	12/16/2021	Eastern / Western Intertie Connection (PRV) Station/Facility: Administrative Plot Plan (PP 21-11)
2020059028	NOD	March Joint Powers Authority	11/29/2021	2021 March JPA Truck Route Ordinance (Ordinance #JPA 21-02)
2021110304	NOP	March Joint Powers Authority	11/19/2021	West March Upper Plateau
2020059028	NOD	March Joint Powers Authority	9/24/2021	2021 March JPA Truck Route Ordinance (Ordinance #JPA 21-02)
2002071089	NOD	March Joint Powers Authority	9/15/2021	Plot Plan 21-01 UPS Onsite Refueling Facility
2021060538	NOE	March Joint Powers	6/23/2021	Lease Agreement between the March Joint Powers Authority and the County of Riverside Facilities Management Department

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	Authority		
2016081061 NOD	March Joint Powers Authority	6/9/2021	Cooperative Agreement between the March Joint Powers Authority, Riverside County Flood Control and Water Conservation District and Riverside Inland Development,
2016081061 NOD	March Joint Powers Authority	5/27/2021	Veterans Industrial Park 215 (VIP 215) Project: Plot Plan Amendment #1 (PP 20-02, A1) and Tentative Parcel Map 37220
2020059028 NOE	March Joint Powers Authority	4/29/2021	Final Map 37878 (Final Map 20-02) for the South Campus of the March Business Center Specific Plan
2021040702 NOE	March Joint Powers Authority	4/29/2021	Memorandum of Understanding between the March Joint Powers Authority, Riverside County Flood Control and Water Conservation District and March Air Reserve Base
2021040012 NOP	March Joint Powers Authority	4/1/2021	Meridian D-1 Gateway Aviation Center Project
2020059028 NOD	March Joint Powers Authority	2/16/2021	Amendment No. 8 to the March Business Center Specific Plan (SP-1)
2009071069 NOE	March Joint Powers Authority	2/4/2021	Determination of Substantial Conformance 3, for a Minor Modification to the Approved Greens Group / Veterans Plaza Commercial Center – Plot Plan PP16-02
2020059028 NOD	March Joint Powers Authority	1/28/2021	South Campus Specific Plan and Village West Drive Extension Project
2009071069 NOE	March Joint Powers Authority	1/28/2021	Final Map 37744 (Final Map 19-01) For the MS Prime Six Business Park
2021010211 NOP	March Joint Powers Authority	1/20/2021	Notice Of Preparation / Notice Of Scoping Meeting For A Draft Environmental Impact Report For The Westmont Village Industrial Warehouse Project
2016081061 NOD	March Joint Powers Authority	1/19/2021	Veterans Industrial Park 215 (VIP 215)
2016081061 NOD	March Joint	1/19/2021	Veterans Industrial Park 215 (VIP 215)

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		Powers Authority		
2020090483	NOE	March Joint Powers Authority	9/24/2020	AT&T Tower at March Field Air Museum
2020090415	NOE	March Joint Powers Authority	9/21/2020	Final Map 3790 I (Final Map 20-03) for condominium purposes for the MS Van Buren II Business Park
2020059028	SBE	March Joint Powers Authority	9/3/2020	South Campus Specific Plan and Village West Drive Extension Project
2020080041	NOE	March Joint Powers Authority	8/5/2020	Tentative Parcel Map 20-03 (TPM 20-03) for condominium purposes for the MS Van Buren II Business Park
2020060596	NOE	March Joint Powers Authority	6/25/2020	Offer of Dedication: Brown Street, County of Riverside
2020060150	NOE	March Joint Powers Authority	6/8/2020	Determination of Substantial Conformance No. 2 for the approved Plot Plan 17-05 for the MS Van Buren II Business Park located at 21750-21880 Van Buren Blvd
2020059028	NOP	March Joint Powers Authority	5/18/2020	South Campus Specific Plan and Village West Drive Extension Project
2020040290	NOE	March Joint Powers Authority	4/23/2020	Design Plan 19-05: Eagle Business Park
2016081061	EIR	March Joint Powers Authority	3/11/2020	Veterans Industrial Park 215 (VIP 215) Project
2018121026	NOD	March Joint Powers Authority	2/13/2020	Grant of Easements to Southern California Edison and the Western Municipal Water District for the installation of utility systems and improvements for the imple
2009071069	NOD	March Joint Powers Authority	12/12/2019	MS Prime Six - Development C

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2009071069 NO	March Joint Powers Authority	11/14/2019	MS Prime Six- Development C
2019100499 NO	March Joint Powers Authority	10/24/2019	Easement for Right of Way and Pedestrian Access to the City of Moreno Valley
2019090138 NO	March Joint Powers Authority	9/4/2019	Substantial Conformance Determination for a Minor Modification to the Approved Greens Group I Veterans Plaza - Plot Plan PPI 6-02, located at 22400 Van Buren Bo
2019090029 NO	March Joint Powers Authority	8/29/2019	Final Map 30857-9, Amendment No. I
2019070518 NO	March Joint Powers Authority	6/27/2019	Declaration of Covenants, Servit~cies, Conditions, Restrictions and Easements (CC&R's) for Veterans Plaza (Greens Group/Greens rnv. 11, LLC),
2019070519 NO	March Joint Powers Authority	6/27/2019	Final Map 371 16-1
2018111036 EIR	March Joint Powers Authority	4/18/2019	K4 Warehouse and Cactus Channel Improvements Project
2019038712 NO	March Joint Powers Authority	3/29/2019	Offer of Dedication of Easement, Castle Street - CAL FIRE
2018121026 NO	March Joint Powers Authority	3/28/2019	Heacock Street Truck Terminal Facility
2019011068 NO	March Joint Powers Authority	3/28/2019	The Meridian Trunk Sewer Improvement Project
2018121026 NO	March Joint Powers Authority	3/14/2019	Heacock Street Truck Terminal Facility
2019028307 NO	March Joint Powers Authority	2/14/2019	Resolution #JPA 19-01. by which the March Joint Powers Commission ("Commission") of the March Joint Powers Authority approved minor tenant improvements

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2019011068 MND	March Joint Powers Authority	1/30/2019	Meridian Trunk Sewer Improvement Project
2019018513 NOE	March Joint Powers Authority	1/29/2019	Determination of Substantial Conformance No. 1 for the approved Plot Plan 16-07 and Plot Plan 16-07, Amendment 1 wihtin the March Business Cener Specific Plan
2018121026 MND	March Joint Powers Authority	12/12/2018	Heacock Street Truck Terminal Facility
2018118511 NOE	March Joint Powers Authority	11/29/2018	Substantial Conformance Determination for a Minor Modification to the Approved Greens Group/Veterans Plaza-Plot Plan PP16-02, located at 22400 Van Buren Bouleva
2018111036 NOP	March Joint Powers Authority	11/19/2018	K4 Warehouse and Cactus Channel Improvements Project
2002071089 NOD	March Joint Powers Authority	10/25/2018	March Business Center Specific Plan Amendment - Land Swap Addemdum
2009071069 NOD	March Joint Powers Authority	9/27/2018	MS Van Buren II - Development B
2009071069 NOD	March Joint Powers Authority	9/13/2018	Economic Business Center
2009071069 NOD	March Joint Powers Authority	9/13/2018	MS Van Buren II - Development B
2018098296 NOE	March Joint Powers Authority	9/13/2018	Ordinance #JPA 18-02 - March JPA Cannabis Ordinance
2002071089 NOD	March Joint Powers Authority	7/2/2018	Petition of March Joint Powers Authority to the Local Agency Formation Commission of Riverside County for Local Government Reorganization to Facilitate Developm
2018068676 NOE	March Joint	6/28/2018	Final Map 37107

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		Powers Authority		
2018058040	NOE	March Joint Powers Authority	5/2/2018	Determination of Substantial Conformance No. 1 for approved Plo Plan 17-03, within the Meridian North Campus Specific Plan (SP-5) area
2015031015	NOD	March Joint Powers Authority	3/9/2018	D-3 Parcel Freeway Business Center Project (Streambed Alteration Agreement No. 1600-2015-0097-R6)
2015031015	NOD	March Joint Powers Authority	2/28/2018	Freeway Business Center
2015031015	NOD	March Joint Powers Authority	2/15/2018	Freeway Business Center
2015031015	ОТН	March Joint Powers Authority	2/1/2018	Freeway Business Center
2002071089	NOD	March Joint Powers Authority	12/19/2017	March JPA Truck Route Update: 1) An Action to Adopt Resolution #JPA 17-33 Adopting CEQA Findings and Approving General Plan Amendment GP 17-03 to Modify Exhibit
2017128438	NOE	March Joint Powers Authority	12/19/2017	The March Inland Port Taxyway Golf Realignment
2017128402	NOE	March Joint Powers Authority	12/18/2017	Ordinance #JPA 17-05: Transportation Uniform Mitigation Fee Update
2016061020	NOD	March Joint Powers Authority	11/9/2017	Meridian West Campus-Lower Plateau Project
2016061020	NOD	March Joint Powers Authority	10/26/2017	Meridian West Campus-Lower Plateau Project
2016061020	отн	March Joint Powers Authority	10/13/2017	Meridian West Campus-Lower Plateau Project

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2016061020	EIR	March Joint Powers Authority	6/19/2017	Meridian West Campus-Lower Plateau Project
2009071069	NOD	March Joint Powers Authority	4/27/2017	Veterans Plaza - Specific Plan Amendment-SPA 16-03 A3
2009071069	NOD	March Joint Powers Authority	4/13/2017	Veterans Plaza - Master Conditional Use Permit-CUP 16-02, Plot Plan-PP 16-02, Specific Plan Amendment-SPA 16-03 A3, Tract Map- TM 16-01, Variance-V 16-01
2017048244	NOE	March Joint Powers Authority	4/13/2017	Offer of Dedication of Land, City of Moreno Valley
2008071021	NOD	March Joint Powers Authority	4/3/2017	Plot Plan 16-01 Riverside Behavioral Healthcare Hospital Project within the March LifeCare Campus Specific Plan Area to be located at 15245 6th Street, Riversid
2016128262	NOE	March Joint Powers Authority	12/16/2016	Third Amendment to Lease Agreement with Pyro Spectaculars, Inc. and March Joint Powers Authority for Fireworks Storage
2016128263	NOE	March Joint Powers Authority	12/16/2016	Determination of Substantial Conformance No. 1 of Plot Plan 06-04 for the Phase II Expansion, within the March Business Center Specific Plan Area
2016118112	NOE	March Joint Powers Authority	11/8/2016	Determination of Substantial Conformance No. 2 of Plot Plan 15- 01, within the Meridian Specific Plan (SP-5) Specific Plan Area
2016118110	NOE	March Joint Powers Authority	11/8/2016	Design Plan 16-05; Building A at 2-901 Krameria Avenue
2016118111	NOE	March Joint Powers Authority	11/8/2016	Design Plan 15-02'; Meridian Distribution Center III
2008071021	NOD	March Joint Powers Authority	10/4/2016	Grant of Easement for the Following Public Utility Company: southern California Edison
2002071089	NOD	March Joint Powers Authority	10/4/2016	Approval of Determination of Substantial Conformance between Tentative Map 30857, Amendment #3 and Final Map 30857-7 for the South Campus of the March Business

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2016081061 NOP	March Joint Powers Authority	8/24/2016	Veterans Industrial Park 215 (VIP 215)
2013111019 NOD	March Joint Powers Authority	8/11/2016	March Joint Powers Authority Heacock Channel, Sunnymead Line B Stages 3 and 4 Project (Streambed Alteration Agreement No.1600-2015-0066-R6)
2016078194 NOE	March Joint Powers Authority	7/15/2016	Ordinance #JPA 16-03 `Water Efficient Landscape Regulations
2016061020 NOP	March Joint Powers Authority	6/9/2016	Meridian West Campus-Lower Plateau Project
2015031015 EIR	March Joint Powers Authority	5/10/2016	Freeway Business Center
2002071089 NOD	March Joint Powers Authority	3/17/2016	March Business Center Specific Plan, Amendment #5 (SP-1, A5); General Plan Amendment 15-02, Tentative Map 30857 Amendmen #3, and Modifications of the March Bus
2002071089 NOD	March Joint Powers Authority	3/2/2016	March Business Center Specific Plan, Amendment #5 (SP-1, A5); General Plan Amendment 15-02, Tentative Map 30857 Amendmen #3, and Modifications of the March Bus
2015031015 NOP	March Joint Powers Authority	3/4/2015	Freeway Business Center
2014108373 NOE	March Joint Powers Authority	10/22/2014	Design Plan PP 14-01
2013111019 EIR	March Joint Powers Authority	9/4/2014	Heacock Channel Improvement Project
2013111019 NOP	March Joint Powers Authority	11/6/2013	Heacock Channel Improvement Project
2013068421 NOE	March Joint Powers	6/27/2013	SP-1 Amendment #4 and March JPA Resolution #JPA 13-14

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	Authority		
2010051046 NOD	March Joint Powers Authority	8/15/2012	March Inland Port Airport General Aviation Facilities Development
2010051046 EIR	March Joint Powers Authority	6/27/2012	March Inland Port Airport General Aviation Facilities Development
2010051046 EIR	March Joint Powers Authority	5/3/2012	March Inland Port Airport General Aviation Facilities Development
2010051046 NOP	March Joint Powers Authority	2/14/2012	March Inland Port Airport General Aviation Facilities Development
2011119010 NOD	March Joint Powers Authority	11/29/2011	Withdrawn Per Lead - AT&T Wireless Facility at Cactus Booster Station - Conditional Use Permit 11-01
2009071069 NOD	March Joint Powers Authority	11/16/2011	Addendum to the Meridian Specific Plan Amendment (SP-5) Subsequent EIR and Plot Plan Amendment 11-05 - Liquefied Gas Storage for the Sysco Facility
2008071021 NOD	March Joint Powers Authority	11/16/2011	U.S. Vets Transitional Housing Specific Plan (pass, approve, and adopt a second reading Ordinance #JPA 11-05, an Ordinance approving the US Vets Specific Plan (S
2008071021 NOD	March Joint Powers Authority	11/16/2011	U.S. Vets Transitional Housing Program
2008071021 NOD	March Joint Powers Authority	7/25/2011	March Lifecare Campus Specific Plan
2002071089 NOD	March Joint Powers Authority	7/25/2011	Approval and adoption of an Addendum prepared for Plot Plan Amendment 11-04 for the construction of a 102,200 square foot parking structure, including a redistr
2002071089 NOD	March Joint Powers Authority	6/2/2011	Approval and adoption of an Addendum prepared for a site plan in the Meridian Business center for a 600,000 square foot distribution center on 26.95 acres
	March Joint	6/2/2011	Approval and adoption of an Addendum prepared for a site plan in

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2009071069 NO	Powers Authority		the Meridian Business center for a 600,000 square foot distribution center on 26.95 acres
2010128139 NO	March Joint Powers Authority	12/16/2010	Resolution #JPA 10-27
2009071069 NO	March Joint Powers Authority	8/9/2010	Meridian Specific Plan Amendment Project Approvals
2009071069 NO	March Joint Powers Authority	7/22/2010	Meridian Specific Plan Amendment Project Approvals
2009071069 OT	March Joint Powers Authority	6/24/2010	Meridian North Campus Specific Plan Amendment
2010051054 NO	March Joint Powers Authority	5/19/2010	March JPA Vision 2030 General Plan Update
2010051046 NO	March Joint Powers Authority	5/17/2010	March Inland Port Airport General Aviation Facilities Development
2009071069 SB	March Joint Powers Authority	4/8/2010	Meridian North Campus Specific Plan Amendment
2008071021 NO	March Joint Powers Authority	12/7/2009	March Lifecare Campus Specific Plan
2008101136 NO	March Joint Powers Authority	12/2/2009	PP 09-02; Design and Plot Plan
2008101136 FIN	March Joint Powers Authority	11/19/2009	PP 09-02: Plot Plan and Design Plan for Expansion of Fresh and Easy Food Processing and Warehouse Facility
2008071021 NO	March Joint Powers Authority	11/19/2009	March Lifecare Campus Specific Plan

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2008071021	March Joint Powers Authority	11/9/2009	March Lifecare Campus Specific Plan
2008101136	March Joint Powers Authority	8/10/2009	PP 09-02: Plot Plan and Design Plan for Expansion of Fresh and Easy Food Processing and Warehouse Facility
2009071069	March Joint Powers Authority	7/20/2009	Meridian North Campus Specific Plan Amendment
2008071021	March Joint Powers Authority	7/13/2009	March Lifecare Campus Specific Plan
2009028180	March Joint Powers Authority	2/23/2009	Tenant Improvement Application by 2 Sisters Food Group ("2SFG" at 21842 Opportunity Way
2002071089	March Joint Powers Authority	1/22/2009	March Business Center Specific Plan
2008101136	March Joint Powers Authority	10/27/2008	Fresh & Easy Food Processing and Distribution Center
2008071021	March Joint Powers Authority	7/7/2008	March Lifecare Campus Specific Plan
2002071089	March Joint Powers Authority	6/18/2008	Amendment of the March Business Center Specific Plan for the Removal of the School Buffer Overlay Zone Surrounding the Closed Arnold Heights School Site
1997071095	March Joint Powers Authority	6/5/2008	General Plan of the March Joint Powers Authority
2008058174	March Joint Powers Authority	5/15/2008	Approval of the March Joint Powers Authority of the Amended Joint Use Agreement between the March Joint Powers Authority and the U.S. Air Force
2006111094	March Joint Powers Authority	4/16/2008	Adoption of a revised Mitigation Monitoring and Reporting Program for Project Sunfield

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1997071095 MND	March Joint Powers Authority	3/19/2008	Arnold Heights School Demolition
2007078312 NOE	March Joint Powers Authority	7/26/2007	Design Application PP 05-07, Design Approval for the LNR Industrial Development, located at 15001 Meridian Parkway
2002071089 NOD	March Joint Powers Authority	4/18/2007	March Business Center
2007048134 NOE	March Joint Powers Authority	4/18/2007	Tetntative Tract Map 30857-Amended
2006111094 NOD	March Joint Powers Authority	1/17/2007	Approval and Adoption of a MND, Mitigation Monitoring and Reporting Plan, and Plot Plan PP 06-04 for Project Sunfield
2006111093 NOD	March Joint Powers Authority	1/17/2007	Approval and Adoption of a MND, Mitigation Monitoring and Reporting Plan, and Plot Plan PP 06-05 for Project Garden
2006111093 MND	March Joint Powers Authority	11/17/2006	Plot Plan Application PP 06-05; Project Garden
2006111094 MND	March Joint Powers Authority	11/17/2006	Plot Plan Application PP 06-04; Project Sunfield
2006098074 NOE	March Joint Powers Authority	9/12/2006	Design Application PP 06-03 for the TESCO Development at 14900 Meridian Parkway
2004081027 NOD	March Joint Powers Authority	9/7/2006	Aviation Facility at March Inland Port
2002071689 NOD	March Joint Powers Authority	3/28/2006	March Business Center
2002071089 NOD	March Joint Powers	3/17/2006	March Business Center

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	Authority		
2005121065 NOC	March Joint Powers Authority	3/17/2006	Pyrospectaculars
2005121065 NEG	March Joint Powers Authority	1/25/2006	Pyrospectaculars
2005081074 NOC	March Joint Powers Authority	1/20/2006	Arnold Heights Demolition
2005121065 NEG	March Joint Powers Authority	12/13/2005	Pyrospectaculars
2005081074 EIR	March Joint Powers Authority	11/14/2005	Amold Heights Demolition
2005041076 FIN	March Joint Powers Authority	9/30/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2005041076 NOE	March Joint Powers Authority	9/30/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2005081074 NOF	March Joint Powers Authority	8/11/2005	Amold Heights Demolition
2005041076 EIR	March Joint Powers Authority	6/9/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2005041076 SIR	March Joint Powers Authority	6/9/2005	Z 04-04 Request for Aviation Zoning & Installation/Operation of the Proposed New Fuel Farm
2005041076 NOF	March Joint Powers Authority	4/14/2005	Z 04-04 Request for Aviation Zoning for Installation/Operation of New, Permanent, Central, Fuel Farm
2004081027 NOE	March Joint	12/17/2004	Aviation Facility at March Inland Port

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		Powers Authority		
2004081027	NOD	March Joint Powers Authority	10/6/2004	Aviation Facility at March Inland Port
2004081027	NOD	March Joint Powers Authority	10/6/2004	Aviation Facility at March Inland Port
2004081027	NEG	March Joint Powers Authority	8/4/2004	Aviation Facility at March Inland Port
2002071089	NOD	March Joint Powers Authority	3/12/2003	March Business Center
2002071089	EIR	March Joint Powers Authority	10/21/2002	March Business Center Specific Plan
2002071089	NOP	March Joint Powers Authority	7/18/2002	March Business Center Specific Plan
1997071095	EIR	March Joint Powers Authority	7/12/1999	General Plan of the March Joint Powers Authority

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Channel Law Group, LLP

Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH# 2021040012)

July 22, 2024

ATTACHMENT C

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ATTACHMENT C

NOCS FOR EACH PROJECT AS WELL AS THE SECRETARY OF STATE PUBLIC RECORDS FOR EACH LLC DEMONSTRATING THE THREE LLCS ARE RELATED

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THE PROPOSED PROJECT – WEST CAMPUS UPPER PLATEAU PROJECT

Meridian Park West, LLC

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DRAFT

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

Prepared for:

March Joint Powers Authority

14205 Meridian Parkway #140 Riverside, California 92518 Contact: Dan Fairbanks

Prepared by:



605 Third Street Encinitas, California 92024 Contact: Nicole Cobleigh

JANUARY 2023

Page 83 of 121 in Comment Letter 0-3

201525710460 Application to Register a Foreign LLC-5 Limited Liability Company (LLC) To register in California an LLC from another state, country or other FILED place, fill out this form, and submit for filing along with: - A \$70 filing fee, and Secretary of State A certificate of good standing, issued within the last six (6) months State of California by the agency where the LLC was formed. SEP 0 3 2015 Km - A separate, non-refundable \$15 service fee also must be included, if you drop off the completed form. Important! LLCs in California may have to pay a minimum \$800 yearly tax to the California Franchise Tax Board. For more information, go to Registered LLCs cannot provide in California "professional services," as defined by California Corporations Code sections 13401(a) and 13401.3. This Space For Office Use Only For questions about this form, go to www.sos.ca.gov/business/be/filing-tips.htm LLC Name to be used for this LLC in California Meridian Park West, LLC List the LLC name you use now (exactly as listed on your certificate of good standing) LLC Name Alternate Name If the LLC name in Item 1a does not comply with California Corporations Code section 17701.08; list an alternate name to be used in California exactly as it is to appear on the records of the California Secretary of State. The alternate name must include: LLC, L.L.C, Limited Liability Company, Limited Liability Co., Ltd. Liability Co. or Ltd. Liability Company, and may not include: bank, trust, trustee, incorporated, inc., corporation, or corp., insurer, or insurance company. For general entity name requirements and restrictions, go to www.sos.ca.gov/business/be/name-availability.htm. LLC History ② a. Date your LLC was formed (MM, DD, YYYY):___ 09/02/2015 Delaware b. State, country or other place where your LLC was formed: c. Your LLC currently has powers and privileges to conduct business in the state, country or other place listed above. Service of Process (List a California resident or a California registered corporate agent that agrees to be your initial agent to accept service of process in case your LLC is sued. You may list any adult who lives in California. You may not list an LLC as the agent. Do not list an address if the agent is a California registered corporate agent as the agent's address for service of process is already on file.) 3 a. Lewis Operating Corp. Agent's Name CA Agent's Street Address (if agent Is not a corporation) - Do not list a P.O. Box City (no abbreviations) State If the agent listed above has resigned or cannot be found or served after reasonable attempts, the California Secretary of State will be appointed the agent for service of process for your LLC. **LLC Addresses** (4) a. 1156 N. Mountain Avenue 91786 Upland CA Street Address of Principal Executive Office - Do not list a P.O. Box State City (no abbreviations) CA Street Address of Principal Office in California, if any - Do not list a P.O. Box City (no abbreviations) Zip State Mailing Address of Principal Executive Office, if different from 4a or 4b City (no abbreviations) State Zip Read and sign below: I am authorized to sign this document under the laws of the state, country or other place where this LLC was formed. John M. Goodman **Authorized Person** Your business title Sian here Print your name here Make check/money order payable to: Secretary of State By Mail Drop-Off Secretary of State Business Entities, P.O. Box 944228 Secretary of State 1500 11th Street., 3rd Floor

Sacramento, CA 94244-2280

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Sacramento, CA 95814

2014 California Secretary of State www.sos.ca.gov/business/be

Upon filing, we will return one (1) uncertified copy of your filed document for free, and will certify the copy upon request and

Corporations Code §§ 17701.04, 17701.08, 17708.02, Revenue and Taxation Code § 17941

payment of a \$5 certification fee.

11 C-5 (REV 01/2014)



The First State

1, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY "MERIDIAN PARK WEST, LLC" IS DULY FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS OF THE THIRD DAY OF SEPTEMBER, A.D. 2015.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "MERIDIAN PARK WEST, LLC"_WAS FORMED ON THE SECOND DAY OF SEPTEMBER, A.D. 2015. ...

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE NOT BEEN ASSESSED TO DATE.

5815019 8300

151254449

You may verify this certificate online at corp. delaware.gov/authver.shtml

AUTHENTY CATION: 2701752

DATE: 09-03-15

201525710460

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Secretary of State Statement of Information (Limited Liability Company)	For Office Use Only -FILED- File No.: BA20231265906 Date Filed: 8/9/2023					
This form is due within 90 days of initial registration and every two years thereafter. Filing Fee - \$20.00 Certification Fee (Optional) - \$5.00			Date Filet	a: 8/9/2023	Con	
Limited Liability Company Name (Enter the exact alternate name.) MERIDIAN PARK WEST, LLC	t name of the		s Space For G		1 1 1 1	n
2. Secretary of State Entity Number 2 0 1 5 2 5 7 1 0 4 6 0		oreign Count ormed outside o	20 - 20 - 10 Table 10 - 10 Table 10 Tab	of Orga	anizatio	on
4. Business Addresses	-	_				
a. Street Address of Principal Office - Do not list a P.O. Bo	×	City (no abbre	eviations)	State	Zip Co	ode
1156 N. Mountain Avenue		Upland		CA	91	786
b. Mailing Address of LLC, if different than item 4a	-	City (no abbre	eviations)	State	Zip Co	ode
PO BOX 670		Upland		CA	91	785
c. Street Address of California Office, if Item 4a is not in C Do not list a P.O. Box	California	City (no abbre	eviations)	State	Zip Co	ode
5. Manager(s) or Member(s) If no managers have each member. At lea manager/member is If the manager/mem and address(es) on	ast one nam an individua ber is an ad	e and address i al, complete Iter ditional manage	must be listed ms 5a and 5d	d. If the c (leave It	em 5b b	lank).
a. First Name, if an individual - Do not complete Item 5b	Midd	le Name	Last Nam	ie		Suffix
b. Entity Name - Do not complete Item 5a			_1			
MERIDIAN PARK HOLDINGS, LLC						
c. Address		City (no abbre	eviations)	State	Zip Co	ode
1156 N. Mountain Avenue		Upland		CA	91	786
LLC-12 (REV 12/2022) Pa	ge 1 of 2				rnia Secreta zfileOnline.	

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	Process (Must provide either Individual OR (L - Complete Items 6a and 6b only. Must inc		The second second	nd California	a street a	address	
a. California Age	nt's First Name (if agent is not a corporation)	Middl	e Name	Last Nam	е		Suff
b. Street Address P.O. Box	s (if agent is not a corporation) - Do not enter	a	City (no abbrev	ations)	State	Zip Ci	ode
CORPORA	TION - Complete Item 6c only. Only include t	the nam	e of the registere	d agent Co	rporation	1.	
	istered Corporate Agent's Name (if agont is a gement Corp,	corpora	tion) - Do not co	mplete Item	6a or 6l	•	
7. Type of Bus	siness		-11				
	e of business or services of the Limited Liabilit Investment and Development	y Comp	any				
8. Chief Execu	utive Officer, if elected or appointed						
a. First Name		Middl	e Name	Last Name	е		Suff
b. Address	. with	-	City (no abbrevi	ations)	State	Zip Co	ode
9. Labor Judg	ment (See instructions)						
section 17702.0 of Labor Stands	ar or Member, as further defined by Califor 09(a)(8), have an outstanding final judgme ards Enforcement or a court of law, for wh of any wage order of provision of the Lab	ent issu ich no	ed by the Divisi appeal is pendir	on	□ Y€	es [ΖNo
10. Email Notifications							
reminders, by e	ail address to opt-in to receive entity relate email rather than USPS mail. Note: If no en ninders by USPS mail.						
	receive entity notifications via email, Ema						
	r option after filing, you must submit a new rm under penalty of perjury that the inform				0000	l am	-
	alifornia law to sign.			1	K		
0731.23	David O. Team		Authorized Age	ent V	Do	_	_
Date	Type or Print Name		Title	Olava	nature		

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MERIDIAN D-1 GATEWAY AVIATION CENTER Meridian Park D-1, LLC

Page 88 of 121 in Comment Letter 0-3

INITIAL STUDY MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT

Prepared for:

March JPA

14205 Meridian Parkway, Suite 140 Riverside California 92518 Contact: Jeffrey M. Smith, AICP

Prepared by:

DUDEK

605 Third Street Encinitas, California 92024 Contact: Wendy Worthey

MARCH 2021

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Appendix C

Mail to: State Clearinghouse,	P.O. Box 3044, Sacramento, C dress: 1400 Tenth Street, Sacra	A 95812-3044	(916) 445-061	3 SCH#	
			+		
	ateway Aviation Center Project				
Lead Agency: March Joint Pov				son: Jeffrey M	. Smith
Mailing Address: 14205 Meridi		T' 00540		1) 656-7000	
City: N/A		Zip: 92518	County: Ri	verside	
Project Location: County: Riv	verside	City/Nearest Co	mmunity: No C	ity/March Air Res	serve Base and Moreno Valley
Cross Streets: Heacock Street,	between Cardinal Avenue and I				Zip Code: 92158
Longitude/Latitude (degrees, mir	nutes and seconds): 33 ° 52	40 "N/ 117	° 14 ′ 49	" W Total Acr	es: 80
Assessor's Parcel No.: 294-170-		Section: 25	Twp.: 3	Range: 4	Base: San Bernardino BM
		Waterways: Head		Perris Valley C	
Airports: Ma	arch Air Reserve Base	Railways: Metrolink	's 91/Perris Valley I	Line Schools:	Multiple
Document Type:					
CEQA: NOP Early Cons Neg Dec	Draft EIR Supplement/Subsequent EIR (Prior SCH No.) Other: Initial Study	NEPA: [NOI EA Draft EIS FONSI		Joint Document Final Document Other:
Local Action Type:					
General Plan Update General Plan Amendment General Plan Element Community Plan	☐ Specific Plan ☐ Master Plan ☐ Planned Unit Developmen ☐ Site Plan		nit vision (Subdivi	sion, etc.)	Annexation Redevelopment Coastal Permit Other: Zone
Commercial: Sq.ft.	Acres Employees Employees	Mining	g Min	eral	mac (15 acres)
Industrial: Sq.ft. 270,820 Educational:	Acres 64 Employees 20		Typ Treatment: Typ	e	MW MGD
Recreational:			lous Waste: Typ		MGD
Water Facilities: Type	MGD	Other:	<1 acre Heac	ock Street RO	N disturbance
Project Issues Discussed in	Document:				
■ Aesthetic/Visual ■ Agricultural Land ■ Air Quality ■ Archeological/Historical ■ Biological Resources □ Coastal Zone ■ Drainage/Absorption ■ Economic/Jobs	Fiscal Flood Plain/Flooding Forest Land/Fire Hazard Geologic/Seismic Minerals Noise Population/Housing Baland Public Services/Facilities	Recreation/I Schools/Uni Septic Syste Sewer Capa Soil Erosion Solid Waste Traffic/Circ	iversities ems city n/Compaction/G crdous	Grading C	Vegetation Water Quality Water Supply/Groundwater Wetland/Riparian Growth Inducement Jand Use Cumulative Effects Other: Tribal Cultural
	eneral Plan Designation: d Aviation Uses/No Zon e use a separate page if nece		ion/Aviatio	n (AV)	
The proposed Project consists of two crapproximately 64-acres under March Joconstruction, widening, and realignmen the public-right-of-way along Heacock Splot plan approval to construct, an approximation of the public registerial cargo airplanes, 90 trailers 42 stalls for employee parking, an expandetention basin; removal of an existing detention basin; removal of an existing	omponents, the Air Cargo Center Components the Air Cargo Center Component Powers Authority jurisdiction. The Off-t, storm-drain extensions, and an access is troet adjacent to the eastern boundary of oximate 201, 200-square-foot air cargo but torage positions; 214 stalls for employee insion of the existing taxiway/tarmac within security fence and construction of a new signation of Aivlation (AV) for the approxim	ent and the Off-Site Co Site Component would oadway construction w the Project site (approx- liding with 9 grade level parking, an approximate n March Air Reserve Ba security fence; and a sig	be constructed with ithin March Air Res k. 1 acre). The follo doors and 42 dock e 69,620-square-fo ise; construction of gnalized entrance o	hin approximately 2 serve Base (approx wing discretionary k positions; a parkr ot maintenance bui stomwater facilitie into Heacock Stree	44 acres, and would include taxiwa. 23 acres), as well as work within approvals would be required. (1) A ig apron sufficient to support iding with grade level access and s, including an underground t, aligned with the facility entrance t, aligned with the facility entrance
	ssign identification numbers for all ne	w projects. If a SCH.	number already e	xists for a project	(e.g. Notice of Preparation or
previous draft document) please fill i	n.				Revised 2010

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	Agencies may recommend State Clearinghouse distr u have already sent your document to the agency ple		
Х	Air Resources Board	Х	Office of Historic Preservation
	Boating & Waterways, Department of		Office of Public School Construction
	California Emergency Management Agency	X	Parks & Recreation, Department of
	California Highway Patrol	-	Pesticide Regulation, Department of
X	Caltrans District # 8	X	Public Utilities Commission
	Caltrans Division of Aeronautics	X	Regional WQCB # 8
X	— Caltrans Planning	X	
	Central Valley Flood Protection Board	x	Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Development Comm.
	Coastal Commission	-	San Gabriel & Lower L.A. Rivers & Mtns. Conservance
	Colorado River Board		San Joaquin River Conservancy
X	Conservation, Department of	-	Santa Monica Mtns. Conservancy
	Corrections, Department of	-	State Lands Commission
	Delta Protection Commission		SWRCB: Clean Water Grants
	Education, Department of	X	SWRCB: Water Quality
ζ	Energy Commission		SWRCB: Water Rights
K	Fish & Game Region # 6		Tahoe Regional Planning Agency
	Food & Agriculture, Department of	x	Toxic Substances Control, Department of
	Forestry and Fire Protection, Department of	X	Water Resources, Department of
(General Services, Department of	-	
	Health Services, Department of		Other:
	Housing & Community Development		Other:
X	Native American Heritage Commission		
_oca	al Public Review Period (to be filled in by lead age	ncy)	
Start	ing Date March 31, 2021	Endin	g Date April 29, 2021
eac	I Agency (Complete if applicable):		
Cons	sulting Firm: Dudek		cant: Meridian Park D-1, LLC
Add	ress: 605 Third Street		ess: 1156 North Mountain Avenue
	State/Zip: Encinitas, CA 92024		State/Zip: Upland, CA 91786
	act: Wendy Worthey, Senior Project Manager	Phone	: (909) 985-0971
Phor	ne: (760) 942-5147	_	

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

Revised 2010

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202012210545



Secretary of State

LLC-5

Application to Register a Foreign Limited Liability Company (LLC)

IMPORTANT - Read Instructions before completing this form.

Must be submitted with a current Certificate of Good Standing issued by the government agency where the LLC was formed. See Instructions.

Filing Fee - \$70.00

Copy Fees - First page \$1.00; each attachment page \$0.50; Certification Fee - \$5.00

Note: Registered LLCs in California may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to https://www.ftb.ca.gov.

Secretary of State State of California APR 2 8 2020

This Space For Office Use Only

1a. LLC Name (Enter the exact name of the LLC as listed on your attached Certificate of Good Standing.)

MERIDIAN P.	ARK D-1	. LLC
-------------	---------	-------

1b. California Alternate Name, If Required (See Instructions - Only enter an alternate name if the LLC name in 1a not available in California.)

2. LLC History (See Instructions - Ensure that the formation date and jurisdiction match the attached Certificate of Good Standing.)

a. Date LLC was formed in home jurisdiction (MM/DD/YYYY) b. Jurisdiction (State, foreign country or place where this LLC is formed.) Delaware 04/ 24 / 2020 c. Authority Statement (Do not alter Authority Statement)

This LLC currently has powers and privileges to conduct business in the state, foreign country or place entered in Item 2b.

Business Addresses (Enter the complete business addresses, Items 3a and 3b cannot be a P.O. Box or "in care of" an individual or entity.)

a. Street Address of Principal Executive Office - Do not enter a P.O. Box 1156 N. Mountain Avenue	City (no abbreviations) Upland	State CA	Zip Code 91786
b. Streef Address of Principal Office in California, if any - Do not enter a P.O. Box	City (no abbreviations)	State CA	Zip Code
c. Mailing Address of Principal Executive Office, If different than Item 3a	City (no abbreviations)	State	Zip Code

4. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDITAL - Complete Items 4a and 4b only. Must include agent's full na

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name		Su
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)		State	Zip Code
			CA	

CORPORATION - Complete Item 4c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) - Do not complete item 4a or 4b Lewis Management Corp.

5. Read and Sign Below (See Instructions. Title not required.)

By signing, I affirm under penalty of perjury that the information herein is true and correct and that I am authorized to sign on behalf of the foreign LLC.

Signature LLC-5 (REV 08/2019) John M. Goodman, Authorized Person Type or Print Name

2019 California Secretary of State

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Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY "MERIDIAN PARK D-1, LLC" IS DULY FORMED
UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD STANDING AND
HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS OFFICE SHOW, AS
OF THE TWENTY-EIGHTH DAY OF APRIL, A.D. 2020.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "MERIDIAN PARK D-1, LLC" WAS FORMED ON THE TWENTY-FOURTH DAY OF APRIL, A.D. 2020.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.

7946277 8300
SR# 20203212939
You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 202839029 Date: 04-28-20

202012210545

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Secretary of State Statement of Information	LLC-12		page 1		e Use Or _ED-	-
(Limited Liability Company)			(2022-024	lo.: BA2022 Filed: 5/6/2		
IMPORTANT — This form can be filed online at bizfile.sos.ca.gov.						
Read instructions before completing this form.						
Filing Fee - \$20.00 Copy Fees - First page \$1.00; each attachment page	ne \$0 50.					
Copy Fees - First page \$1.00; each attachment page Certification Fee - \$5.00 plus copy fee		This	s Space For (Office Use	e Only	
Limited Liability Company Name (Enter the exa alternate name, see instructions.)	ict name of th	e LLC. If you n	egistered in (California	using a	n
MERIDIAN PARK D-1, LLC						
2. 12-Digit Secretary of State Entity Number		Foreign Count		of Orga	anizatio	on
2 0 2 0 1 2 2 1 0 5 4 5	COMY IT I		Delaware			
4. Business Addresses						
a. Street Address of Principal Office - Do not list a P.O. I	Вох	City (no abbro	eviations)	State	Zip Co	ode
1156 N. Mountain Avenue		Upland		CA	91	786
b. Mailing Address of LLC, if different than item 4a	*	City (no abbre	eviations)	State	Zip Co	ode
PO BOX 670		Upland		CA	91	785
c. Street Address of California Office, if Item 4a is not in Do not list a P.O. Box	n California	City (no abbre	eviations)	State	Zip Co	ode
5. Manager(s) or Member(s) If no managers ha each member. At I manager/member if the manager/me and address(es) o	least one nam is an individua ember is an ad	ne and address al, complete ite iditional manag	must be liste ems 5a and 5c	ed. If the c (leave it	tem 5b b	blank).
a. First Name, if an individual - Do not complete Item 5b		dle Name	Last Nam	ne		Suffix
b. Entity Name - Do not complete Item 5a			_L		-	<u> </u>
Lewis Management Corp.						
c. Address		City (no abbr	eviations)	State	Zip Co	ode
1156 N. Mountain Avenue		Upland		CA	91	786
LC-12 (REV 11/2021)				2024 Calif	fornia Secret	hans of Otato

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	rporation) M	iddle Name	Last Nan	ne	Suffix
Street Address (if agent is not a corporation) - Do P.O. Box	not enter a	City (no abb	reviations)	State	Zip Code
CORPORATION - Complete Item 6c only. On	ly include the r	name of the regis:	ered agent C		
c. California Registered Corporate Agent's Name (if Lewis Management Corp.					
7. Type of Business					
Describe the type of business or services of the Lim Real Estate Investment and Developr	nent	жирану			
Chief Executive Officer, if elected or apportunity A. First Name		iddle Name	Last Nan		Suffix
a. First Name	M	iddie Name	Last Nan	ner	Sumx
b. Address		City (no abb	reviations)	State	Zip Code
9. Labor Judgment			774	1	
Does any Manager or Member have an outstar Division of Labor Standards Enforcement or a of therefrom is pending, for the violation of any wa	court of law, fe	or which no app	eal	□×·	es 🗸 No
 By signing, I affirm under penalty of perjury authorized by California law to sign. 	that the info	mation herein i	s true and co	orrect and	that I am
3 15 22 David O. Team		Produced Virginia of the Managing Species of the	pery dang, i.i.E. I mander from u.C.	M	1
Date Type or Print Name		Title	5	ignature	

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SOUTH CAMPUS SPECIFIC PLAN AND VILLAGE WEST DRIVE EXTENSION PROJECT

Meridian Park South, LLC

Page 96 of 121 in Comment Letter 0-3

DRAFT

Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR

State Clearinghouse No. 2020059028

Prepared for:

March Joint Powers Authority

14205 Meridian Parkway, Suite 140 Riverside, California 92518 Contact: Lauren Sotelo, Senior Planner

Prepared by:

38 North Marengo Avenue Pasadena, California 91101 Contact: Nicole Cobleigh

SEPTEMBER 2020

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Appendix C

Contact Person: Lauren Sotelo
Contact Person: Lauren Sotelo
Phone: (951) 656-7000 2518
County: Riverside
/Nearest Community: Riverside Zip Code: 92508
Zip Code: 92508
"N / 117 ° 18 ' 09 " W Total Acres: 568.2
Kunge. Buse.
vays: Heacock Channel, Perris Valley Storm Drain Channel
VS: Metrolink's 91/Perris Valley Line Schools: Tomas Rivera Elem., Amelia Earhart Middle
, s
EPA: NOI Other: Joint Document Goton FA Office of Planning & Goton Document Draft EIS Other: FONSI 18 2020
Rezone Annexation Annexation Prezone Redevelopment Use Permit Coastal Permit Land Division (Subdivision, etc.) Other:
☐ Transportation: Type ☐ Mining: Mineral ☐ Power: Type ☐ Waste Treatment: Type MGD ☐ Hazardous Waste: Type
Other: 0.9 acres of Public Facilities
Recreation/Parks
Schools/Universities
Sewer Capacity
Soil Erosion/Compaction/Grading Growth Inducement
Solid Waste Land Use
Γoxic/Hazardous
Fraffic/Circulation ■ Other: Tribal Cultural

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f you	have already sent your document to the agency please	denote t	
(nat with all S.
	Air Resources Board	S	Office of Historic Preservation
	Boating & Waterways, Department of		Office of Public School Construction
	California Emergency Management Agency	X	Parks & Recreation, Department of
	California Highway Patrol		Pesticide Regulation, Department of
(Caltrans District # 8	X	Public Utilities Commission
	Caltrans Division of Aeronautics	S	Regional WQCB # 8
(Caltrans Planning	x	Resources Agency
	Central Valley Flood Protection Board	×	Resources Recycling and Recovery, Department of
	Coachella Valley Mtns. Conservancy		S.F. Bay Conservation & Development Comm.
	Coastal Commission	-	San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
	Colorado River Board		San Joaquin River Conservancy
(Conservation, Department of		Santa Monica Mtns. Conservancy
	Corrections, Department of		State Lands Commission
	Delta Protection Commission	-	SWRCB: Clean Water Grants
	Education, Department of	S	SWRCB: Water Quality
(Energy Commission		SWRCB: Water Rights
3	Fish & Game Region # 6		Tahoe Regional Planning Agency
	Food & Agriculture, Department of	S	Toxic Substances Control, Department of
	Forestry and Fire Protection, Department of	s	Water Resources, Department of
(General Services, Department of		
	Health Services, Department of		Other:
	Housing & Community Development	-	Other:
3	Native American Heritage Commission		
 ocal	Public Review Period (to be filled in by lead agency)	
Startii	ng Date Monday, May 18, 2020	Endin	g Date Friday, June 19, 2020
 Lead	Agency (Complete if applicable):		
Once	alting Firm: Dudek	Applic	eant: Meridian Park South, LLC
	SS: 38 North Marengo Avenue	Addre	ss: 1156 N. Mountain Avenue
	State/Zip: Pasadena, CA 91101		tate/Zip: Upland, CA 91785
	ct: Nicole Cobleigh, Senior Project Manager		: (909) 579-1294
hone	: (626) 204-9829		
	ture of Lead Agency Representative: Lauren Sotelo		Optimity signed by Lauren Schelo Date: 05/08/2020

Revised 2010

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Secretary of State

LLC-5

Application to Register a Foreign Limited Liability Company (LLC)

IMPORTANT — Read Instructions before completing this form.

Must be submitted with a current Certificate of Good Standing issued by the government agency where the LLC was formed. See Instructions.

Filing Fee - \$70.00

Copy Fees - First page \$1.00; each attachment page \$0.50;

Certification Fee - \$5.00

Note: Registered LLCs in California may have to pay minimum \$800 tax to the California Franchise Tax Board each year. For more information, go to https://www.ftb.ca.gov.

201914910075

FILED (**)
Secretary of State
State of California

MAY 2 1 2019

W

This Space For Office Use Only

1a. LLC Name (Enter the exact name of the LLC as listed on your attached Certificate of Good Standing.)

MERIDIAN PARK SOUTH, LLC

1b. California Alternate Name, If Required (See Instructions – Only enter an alternate name if the LLC name in 1a not available in California.)

2. LLC History (See Instructions - Ensure that the formation date and jurisdiction match the attached Certificate of Good Standing.)

a. Date LLC was formed in home jurisdiction (MM/DD/YYYY) b. Juri

b. Jurisdiction (State, foreign country or place where this LLC is formed.)

Delaware

c. Authority Statement (Do not alter Authority Statement)

This LLC currently has powers and privileges to conduct business in the state, foreign country or place entered in Item 2b.

3. Business Addresses (Enter the complete business addresses, Items 3a and 3b cannot be a P.O. Box or "in care of" an individual or entity.)

a. Street Address of Principal Executive Office - Do not enter a P.O. Box 1156 N. Mountain Avenue	City (no abbreviations) Upland	State CA	2lp Code 91786
b. Street Address of Principal Office in California, if any - Do not enter a P.O. Box	City (no abbreviations)	State CA	Zip Code
c. Mailing Address of Principal Executive Office, if different than item 3a	City (no abbreviations)	State	Zip Code

4. Service of Process (Must provide either Individual OR Corporation.)

INDIVIDUAL - Complete Items 4a and 4b only. Must include agent's full name and California street address

a. California Agent's First Name (if agent is not a corporation)	Middle Name	Last Name			Suffix
b. Street Address (if agent is not a corporation) - Do not enter a P.O. Box	City (no abbreviations)		State	Zip Cod	е

CORPORATION - Complete Item 4c only. Only include the name of the registered agent Corporation.

c. California Registered Corporate Agent's Name (if agent is a corporation) - Do not complete Item 4a or 4b

Lewis Management Corp.

5. Read and Sign Below (See Instructions. Title not required.)

I am authorized to sign on behalf of the foreign LLC.

Signature

LLC-5 (REV 01/2017)

John M. Goodman, Authorized Person

Type or Print Name

2017 California Secretary of State www.sos.ca.gov/business/be

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Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF
DELAWARE, DO HEREBY CERTIFY "MERIDIAN PARK SOUTH, LLC" IS DULY
FORMED UNDER THE LAWS OF THE STATE OF DELAWARE AND IS IN GOOD
STANDING AND HAS A LEGAL EXISTENCE SO FAR AS THE RECORDS OF THIS
OFFICE SHOW, AS OF THE TWENTY-FIRST DAY OF MAY, A.D. 2019.

AND I DO HEREBY FURTHER CERTIFY THAT THE SAID "MERIDIAN PARK SOUTH, LLC" WAS FORMED ON THE SEVENTEENTH DAY OF MAY, A.D. 2019.

AND I DO HEREBY FURTHER CERTIFY THAT THE ANNUAL TAXES HAVE BEEN ASSESSED TO DATE.

7424657 8300
SR# 20194236014
You may verify this certificate online at corp.delaware.gov/authver.shtml

Authentication: 202863952

Date: 05-21-19

201914910075

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		-		For Of	fice Use Only
Secretary of State	LLC-12				LED-
Statement of Information (Limited Liability Company)			File	No.: BA20	230653717
(Limbs Liability Company)		1	Date	e Filed: 4/1	1/2023
This form is due within 90 days of initial registration and <u>every two years</u> thereafter.					
Filing Fee - \$20.00					
Certification Fee (Optional) - \$5.00		TH	is Space For	Office Us	e Only
Limited Liability Company Name (Enter the ex-	act name of th	1	and the state of t	100000000000000000000000000000000000000	9000000
alternate name.)					oranja 🕶 dos
MEDIDIAN DADE COUTH II C					
MERIDIAN PARK SOUTH, LLC					
2. Secretary of State Entity Number		oreign Cour			anization
2 0 1 9 1 4 9 1 0 0 7 5			Delaware		
4. Business Addresses			30.30		* * X
a. Street Address of Principal Office - Do not list a P.O.	Вох	City (no abb	reviations)	State	Zip Code
1156 N. Mountain Avenue		Upland		CA	91786
b. Mailing Address of LLC, if different than item 4a		City (no abb	reviations)	State	Zip Code
PO BOX 670		Upland		CA	91785
c. Street Address of California Office, if Item 4a is not in Do not list a P.O. Box	in California	City (no abb	reviations)	State	Zip Code
DO NOT HIST & T O. BOX				CA	
5. Manager(s) or Member(s) If no managers ha				1	<u> </u>
If no managers he each member. At manager/member if the manager/me and address(es) of the manager in the manage	least one nam r is an individua ember is an ad	e and address al, complete Ite ditional manag	must be liste ems 5a and 5	d. If the c (leave it	em 5b blank).
a. First Name, if an individual - Do not complete Item 5t		le Name	Last Nan	10	Suffix
b. Entity Name - Do not complete Item 5a		-			
Meridian Park Holdings, LLC				State	Zip Code
Meridian Park Holdings, LLC		City (no abb	reviations)	State	Lip Codo
Meridian Park Holdings, LLC c. Address 1156 N. Mountain Avenue		City (no abbi	reviations)	CA	91786

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	Process (Must provide either Individual OR C L – Complete Items 6a and 6b only. Must incl		e and Califorr	nia street a	address.
a. California Agei	nt's First Name (if agent is not a corporation)	Middle Name	Last Nar	ne	Suffi
o. Street Address P.O. Box	s (if agent is not a corporation) - Do not enter	a City (no abb	reviations)	State	Zip Code
CORPORAT	FION – Complete Item 6c only. Only include the	he name of the regist	tered agent C	orporation	1.
2 22	stered Corporate Agent's Name (if agent is a d gement Corp.	corporation) – Do not	t complete Ite	m 6a or 6	b
7. Type of Bus	siness				
	of business or services of the Limited Liability Investment and Development	/ Company			
8. Chief Execu	itive Officer, if elected or appointed	-		- 1	
a. First Name		Middle Name	Last Nar	ne	Suffix
o. Address	4 1	City (no abbi	reviations)	State	Zip Code
9. Labor Judg	ment (See <u>instructions)</u>	t			
	er or Member, as further defined by Califon 09(a)(8), have an outstanding final judgmen	nt issued by the Di	vision	Ŭ Ye	es 🚺 No
section 17702.0 of Labor Standa	ards Enforcement or a court of law, for white of any wage order of provision of the Labo	or Code?			
section 17702.0 of Labor Standa	of any wage order of provision of the Labo	or Code?	y 10	1	
section 17702.0 of Labor Standa for the violation 10. Email Notif Provide an ema reminders, by e notices and rem Yes, I opt-in to	of any wage order of provision of the Laborications all address to opt-in to receive entity related mail rather than USPS mail. Note: If no en inders by USPS mail. receive entity notifications via email. Email	d notifications, inclinal address is prov	vided, you w	ill continu	
section 17702.0 of Labor Standa for the violation 10. Email Notif Provide an ema reminders, by e notices and rem Yes, I opt-in to to To change your 3y signing, I affir	of any wage order of provision of the Laborications all address to opt-in to receive entity related mail rather than USPS mail. Note: If no enhinders by USPS mail. receive entity notifications via email. Email option after filing, you must submit a new rm under penalty of perjury that the informations.	d notifications, incl nail address is prov I Address: complete Stateme	vided, you w	ill continu	ue to receive
section 17702.0 of Labor Standa for the violation 10. Email Notif Provide an ema reminders, by e notices and rem Yes, I opt-in to to To change your 3y signing, I affir	of any wage order of provision of the Labo lications all address to opt-in to receive entity related mail rather than USPS mail. Note: If no en hinders by USPS mail. receive entity notifications via email. Email	d notifications, incl nail address is prov I Address: complete Stateme	ent of Information	ill continu	ue to receive

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Channel Law Group, LLP

Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH#: 2021040012)

July 22, 2024

ATTACHMENT D

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Table 3-1. Cumulative Projects

ID	Project Name	Land Use	Quantity	Unit
March Jo	oint Powers Authority			
MJPA1	Meridian Business Park (West Campus)	Industrial Park	2,279	ksf
MJPA2	K4 Parcel	Warehouse	718	ksf
МЈРАЗ	Economic Business Center	Warehouse	125	ksf
MJPA4	Freeway Business Center	Warehouse	709	ksf
MJPA5	Veteran's Industrial Park/VIP 215	Warehouse	1,867	ksf
MJPA6	Veteran's Plaza Phase I and Phase II	Commercial	202,000	ksf
MJPA7	MS Van Buren I	Warehouse	176	ksf
MJPA8	MS Van Buren II	Warehouse	162	ksf
МЈРА9	MS Prime Six	General Office	75	ksf
MJPA10	Meridian Distribution Center IV	Warehouse	90	ksf
MJPA11	Meridian Distribution Center III	Warehouse	262	ksf
MJPA12	Eagle Business Park	Business Park	390	ksf
MJPA13	Meridian South Campus	Office	388	ksf
		Commercial Retail	298	ksf
		Business Park	1,764	ksf
		Warehousing	774	ksf
		High-Cube Cold Storage	700	ksf
		High-Cube Transload	800	ksf
	1	LGB6 (Building A)	1,000	ksf
		Parcel Delivery	1,000	ksf
		Dog Park	6	Acres
MJPA14	Meridian U1 L2 Industrial Warehouse	Warehouse	49	ksf
MJPA15	March Veterans Village - Building 1	Transitional Housing	16	DU
MJPA16	West Campus Upper Plateau	High-Cube Fulfillment	2,563	ksf
		High-Cube Cold Storage	500	ksf
		Business Park - Office	529	ksf
		Business Park - Warehouse	1,234	ksf
		Commercial	161	ksf
		Active Park	42	Acres
		Public Park	18	Acres
City of R	iverside			
R1	P17-0419/20/21	Fast Food w/Drive Through	2	ksf
R2	P16-0578	Warehouse	82	ksf
R3	P19-0151/P19-0152/P19-0153	Health and Fitness Club	22	ksf
R4	P13-0665	Single-Family Detached	8	DU
R5	P15-1035/P16-0556/P16-0567	Warehouse	176	ksf
R6	P14-0841 to P14-0848/	Warehouse	73	ksf
	P16-0472/P16-0474	Commercial Retail	15	ksf

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT DRAFT EIR MAY 2024

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Table 3-1. Cumulative Projects

ID	Project Name	Land Use	Quantity ^a	Unit
R7	P14-0472/P14-0473/P15-0321/ P15-0322	Single-Family Detached	85	DU
R8	P19-0022/P19-0024/P19-0026/ P19-0027/P19-0028	Fast Food w/Drive Through	4	ksf
R9	Sycamore Hills Distribution Center	Warehouse	603	ksf
County	of Riverside			
RC1	PP 25422	Warehouse	814	ksf
RC2	Knox Business Park	Warehouse	1,259	ksf
RC3	Oleander Business Park	Warehouse	711	ksf
RC4	Majestic Freeway Business Center Specific Plan	General Light Industrial	6,200	ksf
RC5	PPT210130	Warehouse	239	ksf
RC6	PPT190031	High-Cube Warehouse	418	ksf
City of I	Moreno Valley			
MV1	Kearney	High-Cube Warehouse	1,100	ksf
MV2	IDS	High-Cube Warehouse	701	ksf
MV3	First Industrial	High-Cube Warehouse	1,380	ksf
MV4	Prologis 1	High-Cube Warehouse	1,000	ksf
MV5	Moreno Valley Industrial Park	High-Cube Warehouse	208	ksf
MV6	Tract 31442	Single-Family Detached	63	DU
MV7	Moreno Valley Utility Substation	High-Cube Warehouse	N/D	ksf
MV8	Phelan Development	High-Cube Warehouse	98	ksf
MV9	Nandina Industrial Center	High-Cube Warehouse	336	ksf
MV10	Indian Street Commerce Center	High-Cube Warehouse	434	ksf
MV11	Tract 32716	Single-Family Detached	57	DU
MV12	Tract 36760	Single-Family Detached	221	DU
MV13	PEN18-0042	Single-Family Detached	2	DU
MV14	Tract 33024	Single-Family Detached	8	DU
MV15	Scottish Village	Multifamily	194	DU
MV16	Moreno Valley Cactus Center	Warehouse	37	ksf
	(PEN16-0131)	Fast Food w/Drive Through	8	ksf
		Gas Station w/Car Wash	28	VFP
MV17	PA 08-0047-0052 (Komar Cactus	Hotel	110	Rooms
	Plaza)	Fast Food w/Drive Through	8	ksf
		Commercial	42	ksf
City of I	Perris			
P1	Bargemann/DPR 07-09-0018	Warehousing	173	ksf
P2	Duke 2/DPR 16-00008	High-Cube Warehouse	669	ksf
P3	Perris Circle 3	Warehousing	211	ksf

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT DRAFT EIR MAY 2024

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Table 3-1. Cumulative Projects

ID	Project Name	Land Use	Quantity	Unit
P4	Gateway/DPR 16-00003	High-Cube Warehouse	400	ksf
P5	Harley Knox Commerce Park/ DPR 16-004	High-Cube Warehouse	386	ksf
P6	OLC 1/DPR 12-10-0005	High-Cube Warehouse	1,455	ksf
P7	OLC2/DPR 14-01-0015	High-Cube Warehouse	1,037	ksf
P8	Duke at Patterson/DPR 17-00001	High-Cube Warehouse	811	ksf
P9	Markham Industrial/DPR 16-00015	Warehousing	170	ksf
P10	Westcoast Textile/DPR 16-00001	Warehousing	180	ksf
P11	Indian/Ramona Warehouse	High-Cube Warehouse	429	ksf
P12	IPT Perris DC II	High-Cube Warehouse	273	ksf
P13	Western Way/Nandina Warehouse	Cold Storage Warehouse	252	ksf
P14	March Plaza/CUP 16-05165	Commercial Retail	47	ksf
P15	Cali Express Carwash/CUP 16-05258	Canwash	6	ksf
P16	Integra Expansion/MMOD 17-05075	High-Cube Warehouse	273	ksf

Notes: ksf = thousand square feet; DU = dwelling units; N/D = no data; VFP = vehicle fueling positions.

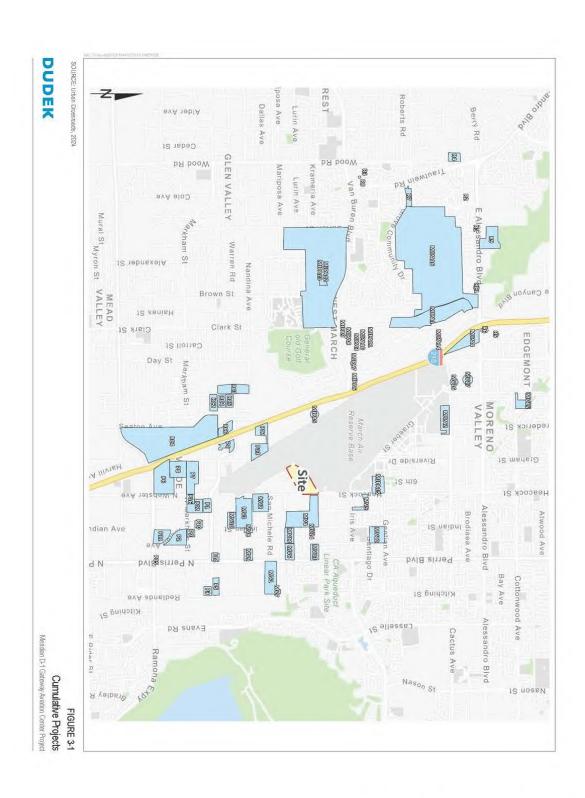
MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT DRAFT EIR MAY 2024

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Quantities rounded to the nearest whole number.



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Channel Law Group, LLP

Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH#: 2021040012)

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Table 4-1. Geographic Scope and Method of Evaluation for Cumulative Impacts

Environmental Resource	Geographic Area	Method of Evaluation
Aesthetics	Immediate Vicinity	List of Projects
Air Quality (Toxic Air Contaminants; Odors)	Immediate Vicinity	List of Projects
Air Quality (Construction/Mobile Sources)	South Coast Air Basin	List of Projects
Biological Resources	Immediate Vicinity	List of Projects
Cultural Resources	Regional and Local	List of Projects
Energy	State	List of Projects
Geology and Soils	Regional	List of Projects
Greenhouse Gas Emissions	South Coast Air Basin	List of Projects
Hazards and Hazardous Materials	Immediate Vicinity	List of Projects
Hydrology and Water Quality	Sub-Watershed	List of Projects
	Groundwater Basin	
Land Use and Planning	Regional and Local	List of Projects
Noise (On-Site Construction Noise)	Immediate Vicinity	List of Projects
Noise (Off-Site Truck Noise)	Immediate Vicinity	List of Projects
Population and Housing	Regional	List of Projects
Public Services	Immediate Vicinity	List of Projects
Recreation	Immediate Vicinity	List of Projects
Transportation	Regional	List of Projects
Tribal Cultural Resources	Regional	List of Projects
Utilities and Service Systems	Immediate Vicinity	List of Projects
Wildfire	Immediate Vicinity	List of Projects

The following list of projects is based on the information provided in the Traffic Analysis Report (Appendix N $\underline{-2}$). The cumulative project list was developed for the purposes of this EIR analysis through consultation with planning and engineering staff from March JPA to include key projects in on the March Air Reserve Base and in the City of Riverside, County of Riverside, and City of Moreno Valley. Table 4-2 presents the cumulative projects surrounding the Project site. The projects listed in Table 4-2 serve as the foundation on which the cumulative analysis approach has been based. Figure 4-1, Cumulative Development Location Map, shows geographically where the projects listed in Table 4-2 are located.

Table 4-2. Cumulative Projects

ID	Project Name	Land Use ¹	Quantity	Units ²	
March Joint Powers Authority					
MJPA1	Meridian Business Park (West Campus)	Industrial Park	2,278.852	TSF	
MJPA2	K4 Parcel	Warehouse	718.000	TSF	
MJPA3	Economic Business Center	Warehouse	124.523	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	
MJPA8	MS Van Buren II	Warehouse	162.041	TSF	
MJPA9	MS Prime Six	General Office	74.922	TSF	

West Campus Upper Plateau Project Draft <u>Final EIR</u>

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Table 4-2. Cumulative Projects

ID	Project Name	Land Use1	Quantity	Units ²
MJPA10	Meridian Distribution Center IV	Warehouse	90.000	TSF
MJPA11	Meridian Distribution Center III	Warehouse	262.269	TSF
MJPA12	Eagle Business Park	Business Park	390.480	TSF
MJPA13	South Campus	Office	388.011	TSF
		Commercial Retail	282.730	TSF
		Business Park	1,764.180	TSF
		Industrial Park	1,774.437	TSF
City of Riv	verside			
R1	P17-0419/20/21	Fast Food w/ Drive Thru	1.857	TSF
R2	P16-0578	Warehouse	82.200	TSF
R3	P19-0151/P19-0152/P19-0153	Health and Fitness Club	21.706	TSF
R4	P13-0665	SFDR	8	DU
R5	P15-1035/P16-0556/P16-0567	Warehouse	176.149	TSF
R6	P14-0841 to P14-0848/	Warehouse	73.200	TSF
NO	P16-0472/P16-0474	Commercial Retail	15.000	TSF
R7	P14-0472/P14-0473/P15-0321/ P15-0322	SFDR	85	DU
R8	P19-0022/P19-0024/P19-0026/ P19-0027/P19-0028	Fast Food w/ Drive Thru	4.319	TSF
R9	Sycamore Hills Distribution Center	Warehouse	603.100	TSF
R10	P06-0900, P08-0269, P08-0270	Single Family Detached Housing	20	DU
R11	P06-1355	Single Family Detached Housing	20	DU
R12	P06-1396	Single Family Detached Housing	20	DU
R13	P03-1404	Single Family Detached Housing	20	DU
R14	P10-0113. P10-0118. P10-0449	Free-Standing Discount Superstore	138.516	TSF
UT4	110-0113,110-0118,110-0443	Home Improvement Superstore	155.433	TSF
		Shopping Plaza	125.608	TSF
R15	P12-0360	Vocational School	11.505	TSF
R16	P12-0500 P12-0507 through P12-0510	Warehouse/Industrial 235.74		TSF
R17	P13-0263, P13-0264, P13-0769	Retail	10.700	TSF
KTI	P13-0263, P13-0264, P13-0769	Day Care	10.000	TSF
		Drive-Thru Restaurant	2.500	TSF
		Office	10.000	TSF
R18	P13-0553, P13-0554, P13-0583,	Medical Office Multi-Family Residential	8.000 275	TSF DU
R19	P14-0065 P13-0607, P13-0608, P13-0609, P13-0854	Industrial	171.616	TSF
R20	P14-0294, P14-0295, P14-0297, P16-0297 (JN:8890)	-		-
R21	P14-0536, P14-0537	Fast Food w/ Drive Thru	3.750	TSF
R22	P14-0600, P14-0601, P14-0602, P15-044	Industrial	121.390	TSF
R23	P14-1070	Warehousing	240.080	TSF
R24	P15-0075, P15-0076, P15-0819	Auto Repair	11.738	TSF
1147	A CONTRACTOR OF THE SECRETARY SECRETARY.	Fast Food w/ Drive Thru	2.200	TSF

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Table 4-2. Cumulative Projects

ID	Project Name	Land Use1	Quantity	Units ²
R25	P15-0983, P15-0984	Child Care	15.000	TSF
R26	P17-0688, P17-0689	Car Wash	5.440	TSF
R27	P19-0042	Restaurant	4.300	TSF
		Office	9.920	TSF
R28	P19-0332, P19-0333	Car Wash	4.340	TSF
R29	P20-0013, P20-0014, P20-0015, P20-0016	Residential	81	DU
R30	P20-0018, P20-0019, P20-0020, P20-0021	Residential	138	DU
R31	P20-0203, P20-0281	Canyon Springs Healthcare Campus	280.800	TSF
County	of Riverside			
RC1	PP 25422	Warehouse	814.000	TSF
RC2	Knox Business Park	Warehouse	1,259.050	TSF
RC3	Oleander Business Park	Warehouse	710.736	TSF
RC4	PP25382	Commercial Office Building	10.275	TSF
City of I	Moreno Valley			
MV1	Scottish Village	Multifamily	194	DU
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
MV3	PA 08-0047-0052	Hotel	110	Rooms
	(Komar Cactus Plaza)	Fast Food w/ Drive Thru	8.000	TSF
		Commercial	42.400	TSF

Source: Appendix N=2.

West Campus Upper Plateau Project Draft Final EIR January 2023 June 2024

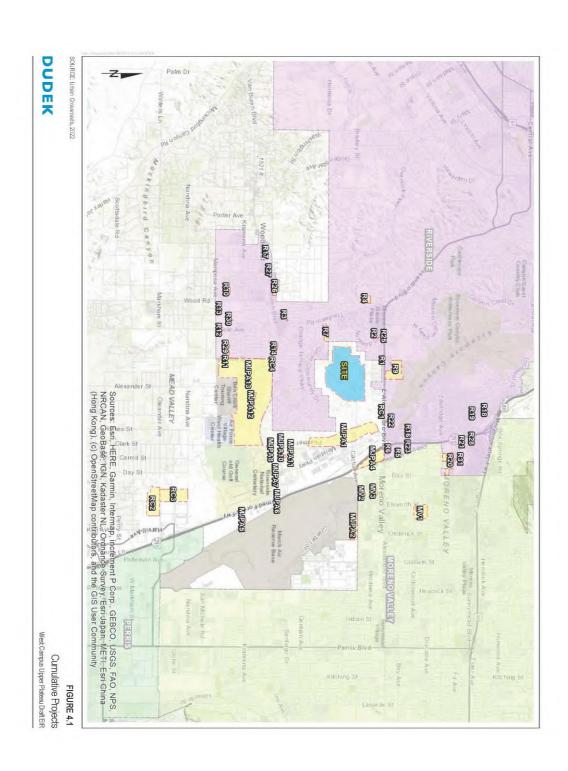
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Notes:

SFDR = Single Family Detached Residential

DU = Dwelling Units; TSF = Thousand Square Feet; SP = Spaces; VFP = Vehicle Fueling Positions



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Channel Law Group, LLP

Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH#: 2021040012)

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ATTACHMENT F

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The following list of projects is based on the information provided in the traffic impact analysis prepared for the proposed Project (Appendix K). The cumulative project list was developed for the purposes of this SEIR analysis through consultation with planning and engineering staff from the City of Riverside, City of Moreno Valley, and County of Riverside to include key projects in their respective jurisdictions. Table 4-1 presents the cumulative projects surrounding the Project site. The projects listed in Table 4-1 serve as the foundation on which the cumulative analysis approach has been based. Figure 4-1, Cumulative Projects, shows geographically where the projects listed in Table 4-1 are located.

Table 4-1. Related Projects

ID	Project Name	Land Use	Quantity	Units1
March JPA				
MJPA1	Meridian Business Park (West Campus)	Industrial	2,278.852	TSF
MJPA2	K4 Parcel	Industrial	718.000	TSF
МЈРА3	Economic Business Center	Business Park	124.523	TSF
MJPA4	Freeway Business Center	Industrial	709	TSF
MJPA6	Veteran's Plaza	Commercial	198.000	TSF
MJPA7	MS Van Buren I	Mixed Use	176.396	TSF
MJPA8	MS Van Buren II	Mixed Use	162.041	TSF
МЈРА9	MS Prime Six	Mixed Use	74.922	TSF
MJPA10	Meridian Distribution Center IV	Industrial	90.000	TSF
MJPA11	Meridian Distribution Center III	Industrial	262.269	TSF
MJPA12	Eagle Business Park	Business Park	360.480	TSF
City of Rive	rside			
R1	P17-0419/20/21	Fast Food w/ Drive Through	1.857	TSF
R2	P16-0578	Warehouse	82.200	TSF
R3	P19-0151/P19-0556/P16-0474	Health and Fitness Club	21.706	TSF
R4	P13-0665	Single-Family Detached Residential	8	DU
R5	P15-1035/P16-0556/P16-0567	Warehouse	176.149	TSF
R6	P14-0841 to P14-0848/P16-	Warehouse	73.200	TSF
	0472/P16-0474	Commercial Retail	15.000	TSF
R7	P14-0472/P14-0473/P15- 0321/P15-032	Single-Family Detached Residential	85	DU
R8	P19-0022/P19-0024/P19- 0026/P19-0027/P19-0028	Fast-Food w/ Drive Through	4.319	TSF
R9	Sycamore Hills Distribution Center	Warehouse	603.100	TSF
County of F	Riverside			
RC1	PP 25422	Warehouse	814.000	TSF
RC2	Knox Business Park	Warehouse	1,259.050	TSF
RC3	Oleander Business Park	Warehouse	710.736	TSF
City of Mon	eno Valley			
MV1	Scottish Village	Multifamily	194	DU
MV2	Moreno Valley Cactus Center (PEN16-0131)	Warehouse	36.950	TSF
		Fast Food w/ Drive Through	7.900	TSF
		Gas Station w/ Car Wash	28	VFP

Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR

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September 2020

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Table 4-1. Related Projects

ID	Project Name	Land Use	Quantity	Units1
MV3	PA 08-0047-0052 (Komar Cactus Plaza)	Hotel	110	Rooms
		Fast Food w/ Drive Through	8.000	TSF
		Commercial	42.400	TSF

Source: Appendix K.

Notes:

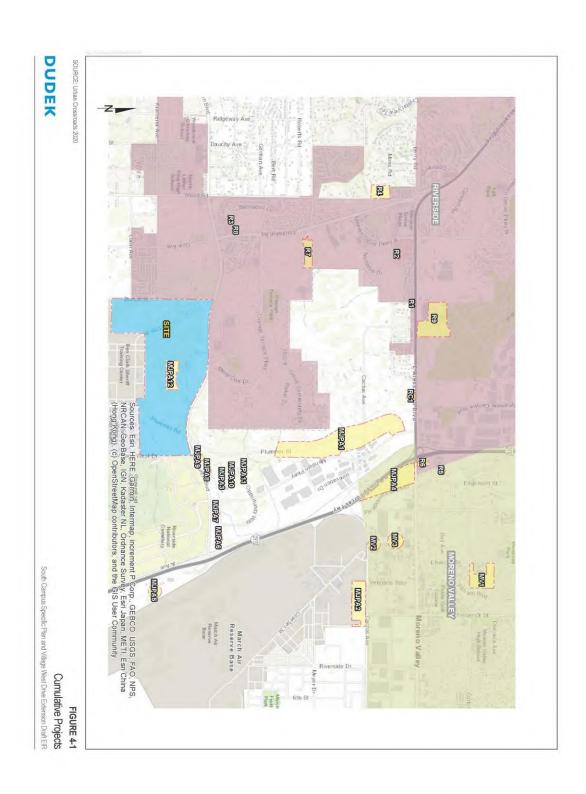
Meridian South Campus Specific Plan and Village West Drive Extension Draft Subsequent EIR September 2020

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DU = Dwelling Units; TSF = Thousand Square Feet; VFP = Vehicle Fueling Positions.



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Channel Law Group, LLP

Comments on Draft Environmental Impact Report for the Meridian D-1 Gateway Aviation Center Project (SCH#: 2021040012)

July 22, 2024

ATTACHMENT G

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Table 4-1 Cumulative Projects List

No.	Project Name/Case No.	Land Use ¹	Quantity Units
RC1	Thrifty Oil Warehouse	Warehousing	194,479 TSF
RC2	Placentia Truck Drop Lot	Truck Trailer Storage	8,06 AC
RC3	Harvill & Water Logistics	High-Cube Fulfillment Center Warehouse	304.376 TSF
la badarra		High-Cube Cold Storage Warehouse	130.447 TSF
RC4	Barker Logistics	High-Cube Fulfillment Center Warehouse	699,630 TSF
RC5	Dedeaux Harvill Truck Terminal	Truck Terminal	55.700 TSF
RC6	Harvill & Rider Warehouse	General Light Industrial	50.249 TSF
	Control of the Contro	High-Cube Transload Short-Term Warehouse	284.746 TSF
RC7	WPC Perris	High-Cube Fulfillment Center Warehouse	384,448 TSF
		High-Cube Cold Storage Warehouse	96.112 TSF
RC8	Majestic Freeway Busines Center (Building 11)	High-Cube Fulfillment Center Warehouse	391.045 TSF
RC9	PPT190029	Warehousing	36.000 TSF
RC10	PPT210021	Trailer Maintenance Facility/Storage	16.200 TSF
RC11	PPT210133	Warehousing	350.481 TSF
RC12	Majestic Freeway Busines Center (Building 13)	High-Cube Fulfillment Center Warehouse	322.997 TSF
RC13	Patterson & Harvill Warehouse	Warehousing & Cold Storage	100,190 TSF
RC14	CUP03599	Hotel	103 RM
RC15	Majestic Freeway Busines Center (Buildings 14A,14B)	Warehousing	354.583 TSF
RC16	PP16763	Warehousing	19.500 TSF
RC17	PP16823	Manufacturing	22.000 TSF
RC18	PP16932	Manufacturing	12.000 TSF
RC19	PP21207	Warehousing	311.412 TSF
RC20	PP23170	Warehousing	286.829 TSF
RC21	PP23342	Warehousing	180.551 TSF
RC22	Majestic Freeway Busines Center (Buildings 1,3.4)	High-Cube Fulfillment Center Warehouse	1,195.740 TSF
RC23	PPT190005	Warehousing	333.553 TSF
RC24	PPT190006	Warehousing	289.556 TSF
RC25	PPT190028	Warehousing	197.856 TSF
RC26	TR27997	Multifamily Housing	120 DU
RC27	Seaton Commerce Center	High-Cube Fulfillment Center Warehouse	210,800 TSF
RC28	Harvill & Cajalco Warehouse	General Light Industrial & Truck Yard	99.770 TSF
RC29	Patterson & Cajalco Warehouse	Warehousing & Cold Storage	107.968 TSF
RC30	Seaton & Cajalco High Cube Warehouse	Warehousing & Cold Storage	350,481 TSF
RC31	Seaton & Cajalco High Cube Warehouse	General Light Industrial	98.940 TSF

¹ TSF = Thousand Square Feet; DU = Dwelling Units; RM = Rooms; TPY = Tons Per Year (Urban Crossroads, 2022g, Table 4-3)

Lead Agency: Riverside County

SCH No. 2022120110

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Response to Comment Letter O-3

Rural Association of Mead Valley Channel Law Group, LLP Jamie Hall July 22, 2024

- **0-3.1** This comment summarizes the comments and concerns addressed in the letter. Specific comments about the Proposed Project and/or environmental analysis of the EIR are provided below.
- O-3.2 This comment summarizes March JPA's various authorities. This comment also notes that the March JPA is the lead agency for the "West March Upper Plateau Project." This is presumably an incorrect reference to a different project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **0-3.3** This comment includes a summary of the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- O-3.4 This comment asserts that the Proposed Project is located "in a region that has been experiencing a substantial amount of past, present and reasonably foreseeable warehouse development." The comment goes on to incorrectly assert that the EIR "largely ignores the likely and intended the relationship of the proposed Project to growth in warehouse use and facilities with the JPA and the associated growth-inducing impacts." As further discussed in Response O-3.9, below, the EIR describes and analyzes the whole Proposed Project. Contrary to the comment's assertion, neither March JPA nor MIPAA is required to analyze all development within the Planning Area in one fell swoop.
- **0-3.5** This comment summarizes the discretionary approvals associated with the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **0-3.6** This comment summarizes the significant and unavoidable impacts of the Proposed Project, as discussed and analyzed in the EIR. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **0-3.7** This comment quotes CEQA Guidelines Section 15088.5, with regard to recirculation requirements for an EIR prior to certification. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **0-3.8** This comment quotes CEQA Guidelines Sections 15003(h) and 15378(a), regarding the requirement that the agency consider the whole of an action when determining whether it will have a significant effect on the environment. The comment also quotes AEP guidance on piecemealing. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- O-3.9 This comment alleges that March JPA engaged in impermissible piecemealing both in terms of analysis of development of the Planning Area as a whole and in conducting separate CEQA analysis for the Proposed Project, Upper Plateau Project, and South Campus Project. The Final EIR describes and analyzes the whole Proposed Project. Contrary to the comment's assertion, neither March JPA nor MIPAA is required to analyze all development within the Planning Area within one CEQA document that addresses all direct and indirect impacts of all individual projects.

CEQA requires the environmental analysis "examine the impacts of contemplated development...that are reasonably foreseeable consequences of the approval. ... Related activities that are similar in nature and that serve the same purpose are separate projects (as opposed to a single project) if they are independently considered for approval and one activity is not a foreseeable consequence of the other."

The Proposed Project and Upper Plateau Project are independent and neither project is a foreseeable consequence of the other. This Project does not require the Upper Plateau Project to operate and vice versa. The March Joint Powers Commission denied the Upper Plateau Project on May 12, 2025. Regarding the South Campus Project, it was originally approved in 2003 and amended most recently in 2021, and it is not currently being considered. Most of the South Campus Project is already operational. The South Campus Project was considered independently and reviewed through an EIR and the Proposed Project is not a foreseeable consequence of the South Campus approval. Both the Upper Plateau Project and South Campus Project are listed in Table 3-1, Cumulative Projects, of the EIR and included in the relevant cumulative impacts analyses.

- O-3.10 This comment asserts that the development of the entirety of the March JPA Planning Area should be treated as a single project because development of the JPA Planning Area has been treated as a single project in past EIRs including the EIRs for the March Air Force Base Master Reuse Plan, the March Air Force Base Redevelopment Project, and the General Plan of the March Joint Powers Authority. The EIRs cited by comment are programmatic rather than project specific EIRs, while the EIR is a project-specific EIR for the Proposed Project. The comment quotes the Upper Plateau Project EIR, which listed plans and environmental documents for the March JPA Planning Area. As discussed in Response O-3.9, above, the Proposed Project is separate from the Upper Plateau Project. This EIR does not tier off of any of the EIRs identified in the comment.
- O-3.11 This comment presents a table the commenter represents as all projects within the March JPA Planning Area since the certification of the March JPA General Plan EIR. It notes that "the following past and present projects producing related or cumulative impacts are within the Planning Area." As noted above, the Final EIR for the Proposed Project does not tier off of the 1999 Master EIR for the March JPA General Plan. In addition, none of the listed projects relate to the Proposed Project. As discussed in Response O-3.9, above, CEQA requires the environmental analysis examine the impacts of contemplated development...that are reasonably foreseeable consequences of the approval. ... Related activities that are similar in nature and that serve the same purpose are separate projects (as opposed to a single project) if they are independently considered for approval and one activity is not a foreseeable consequence of the other."22
- O-3.12 This comment asserts that the General Plan and the Master EIR for the March JPA General Plan are outdated. As explained in Response O-3.10, above, the Proposed Project does not tier off of or rely on the analysis from the Master EIR for the March JPA General Plan. The comment reasserts that the analysis of all projects in the March JPA Planning Area should be analyzed in one EIR. As discussed in Response O-3.9, above, CEQA requires the environmental analysis "examine the impacts of contemplated development...that are reasonably foreseeable consequences of the approval. ... Related activities that are similar in nature and that serve the same purpose are separate projects (as opposed

²¹ Kostka, S., and M. Zischke. 2008. *Practice Under the California Environmental Quality Act* (2nd ed.). California: Continuing Education of the Bar.

²² Kostka and Zischke 2008.

to a single project) if they are independently considered for approval and one activity is not a foreseeable consequence of the other."²³

- O-3.13 The comment suggests that all projects within the March JPA Planning Area by "essentially the same developer" should be considered in one EIR. Specifically, it asserts that the Upper Plateau Project and the South Campus Project should be considered a part of the Proposed Project. As discussed in Response O-3.9, CEQA requires the environmental analysis "examine the impacts of contemplated development...that are reasonably foreseeable consequences of the approval. ... Related activities that are similar in nature and that serve the same purpose are separate projects (as opposed to a single project) if they are independently considered for approval and one activity is not a foreseeable consequence of the other."²⁴ The Proposed Project is independent of both the Upper Plateau Project and South Campus Project. Further, the applicants for these projects are separate and distinct legal entities, and CEQA does not prohibit a developer from pursuing separate and distinct projects within the same jurisdiction. The March Joint Powers Commission denied the Upper Plateau Project on May 12, 2025.
- 0 3.14This comment asserts that the EIR impact analysis should analyze the combined effects of the three developments (Proposed Project, Upper Plateau Project, and South Campus Project) and analyze the three developments in combination with other past, present, and reasonably foreseeable future projects that would occur. It further asserts that a master EIR for the JPA or a combined EIR for the three developments is required. The decision to prepare a master EIR is left entirely to the discretion of the agency. There is never a situation in which a master EIR is required. Moreover, the Proposed Project is not the type of project for which a master EIR may be prepared. According to the relevant Governor's Office of Planning and Research Guidance, Focusing on Master EIRs, 25 at its discretion, a lead agency may prepare a Master EIR for any one of the following projects: (1) a general plan, element, general plan amendment, or specific plan; (2) a project that consists of smaller individual projects that will be carried out in phases; (3) a rule or regulation that will be implemented by subsequent projects; (4) projects that will be carried out or approved pursuant to a development agreement; (5) public or private projects that will be carried out or approved pursuant to, or in furtherance of, a redevelopment plan; (6) a state highway project or mass transit project that will be subject to multiple stages of review or approval; (7) a regional transportation plan or congestion management plan; or (8) a plan proposed by a local agency for the reuse of a federal military base or reservation that has been closed or that is proposed for closure. Similar guidance is provided in CEOA Guidelines Section 15175, Master EIR. The Proposed Project, Upper Plateau Project, and South Campus Project do not fall into any of these categories. As discussed in Response 0-3.9, above, these projects are unrelated and no project is dependent on the approval or development of either other project. Both the Upper Plateau Project and South Campus Project are listed in Table 3-1, Cumulative Projects, of the EIR and included in the relevant cumulative impacts analyses. Further, the March Joint Powers Commission denied the Upper Plateau Project on May 12, 2025.
- **0-3.15** This comment asserts that the "March JPA clearly has a goal of promoting the JPA as a civilian air cargo center" and cites civilian flight statistics associated with March ARB/Inland Port Airport. As discussed

²³ Kostka and Zischke 2008.

²⁴ Kostka and Zischke 2008.

OPR (Governor's Office of Planning and Research). 1997. Focusing on Master EIRs [Third ed.]. November 1997. https://lci.ca.gov/ceqa/docs/20210720-Focusing_on_Master_EIRs.pdf.

in Chapter 2, Project Description, the March AFB Redevelopment Plan included the following goals: maximize the development potential as a regional Intermodal Transportation Facility to support both passenger and freight-related air services; replace lost jobs with new and expanded employment opportunities; maximize joint use (military and civilian) opportunities at airport-related land and facilities; and emphasize the development of aviation uses other than federal aviation, such as commercial and/or freight carrier services. These goals are incorporated into the March JPA General Plan. Examples include Land Use Element Policy 6.1 (Plan for the economic use, reuse, and joint use of the airfield with AFRES), Land Use Element Goal 7 (Maximize the development potential as a regional Intermodal Transportation facility to support both passenger and freight-related air services), and Land Use Element Policy 7.5 (Facilitate development of aviation uses other than federal aviation, such as commercial passenger and/or freight carrier services). The EIR provides more current civilian flight data—Table 3.11-3, Annual Airfield Operations at March ARB, of the EIR provides existing military and civilian flight operations from the Draft KC-46A EIS. As noted in the table, there are 4,972 annual civilian operations. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

- O-3.16 This comment asserts that the Proposed Project is intended to provide cargo service and increased air cargo access for both the Campus Upper Plateau Project and the South Campus Project. As discussed in Chapter 2, Project Description, no tenant is proposed at this time. The comment is merely speculation. Per CEQA Guidelines Section 15064(a), speculation is not considered substantial evidence to support a finding of significant impact. The comment goes on to cite the benefits of warehouse developments with convenient access to air cargo facilities. As discussed in Response O-3.9, above, the Proposed Project is neither dependent on nor connected to those projects.
- O-3.17 This comment asserts that the total annual flight operations are incorrect. As discussed in Chapter 2, Project Description, of the EIR, the EIR evaluated a total of 10,608 annual flight operations (Table 2-1). The flights shown were rounded up to the nearest whole number. As analyzed, a nonpeak day would have approximately 33.18 flight operations or 16.59 flights. A peak day would have approximately 43.85 flight operations or 21.925 flights. This results in 10,608.24 flight operations. In consideration of public input, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% to 7,488 flight operations.
- O-3.18 This comment includes a summary of the alleged types of aircraft used by UPS and Amazon and related payloads. The comment then cites the following statement from Section 2.4.2, Project Operations, of the EIR "as a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by March JPA for conformance with this EIR; non-conformance may require additional CEQA review." The comment asserts that because the fleet mix may change and impacts may be increased, the EIR must contain a "mitigation measure that requires that operations shall not be permitted if impacts are greater than described in the DEIR [Draft EIR], unless they can be mitigated to DEIR levels and mandating the needed additional CEQA review in the event that the fleet mix is different than assumed in the DEIR." This is not true. As stated in Chapter 2, Project Description of the EIR, because the tenant is not yet known, the exact fleet mix is also not yet known. Because there is no proposed tenant at this time, the proposed flight operations scenarios analyzed in the EIR reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. The EIR complies with CEQA

by recognizing that a future tenant of the Proposed Project may not employ the same fleet mix assumed in the EIR and requiring verification of that fleet mix and further environmental review, if necessary, through conditions of approval and MM-NOI-2 (Future Tenant Aircraft Fleet). MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR. Absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. As such, MM-NOI-2 ensures that the impacts will be less than or equal to those studied in the EIR and ensures additional environmental review if the tenant's aircraft fleet mix exceeds the noise levels disclosed in the EIR, consistent with the requirements of CEQA. Per CEQA Guidelines Section 15162(a)(3), subsequent environmental review may be required when new information of substantial importance, which was not known and could not have been known with the exercise at the time the EIR was certified, shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

As such, contrary to comment's assertion, the EIR and MM-NOI-2 proceed exactly as required by CEQA. If the comment's suggestion were followed, if the future tenant's aircraft fleet was not entirely composed of Boeing 767-300s, environmental review would be required, even if the tenant's fleet would not exceed the impacts disclosed in the EIR. This is not required by CEQA. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements.

O-3.19 This comment reiterates the assertion that the Proposed Project, Upper Plateau Project, and South Campus Project are "functionally connected" and are by "essentially the same developer." The comment further asserts that the Upper Plateau and South Campus Projects are a reasonably foreseeable consequence of the Proposed Project. As discussed in O-3.9, above, the Proposed Project is not connected to those projects. The South Campus Project was originally approved in 2003 and

amended most recently in 2021. Most of the South Campus Project is already operational, not a consequence of the Proposed Project. The Upper Plateau Project also is not a consequence of the Proposed Project—it is not dependent on approval of the Proposed Project. The comment further alleges that the Proposed Project is a reasonably foreseeable consequence of the warehouse expansion within the JPA. The Project is not related to or a reasonably foreseeable consequence of either the Upper Plateau Project or the South Campus Project and those projects are not a reasonably foreseeable consequence of the Proposed Project. One of the objectives included in Section 2.3, Project Objectives, in the EIR is to "more fully utilize the operations capacity of the MIP Airport to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region." Identifying a needed service and proposing a project to meet that need does not constitute piecemealing and does not violate CEQA. As discussed in Response 0-3.13, the applicants for these projects are separate and distinct legal entities, and CEQA does not prohibit a developer from pursuing separate and distinct projects within the same jurisdiction.

- O-3.20 This comment summarizes the significant impacts and significant and unavoidable impacts identified in the environmental review of the South Campus Project. The Proposed Project is neither connected to nor dependent on the South Campus Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- O-3.21 This comment summarizes the significant impacts and significant and unavoidable impacts identified in the environmental review of the Upper Plateau Project. The Proposed Project is neither connected to nor dependent on Upper Plateau Project. This comment further notes that the Upper Plateau Project did not include the Proposed Project in its cumulative analysis, which is not relevant here. The March Joint Powers Commission denied the Upper Plateau Project on May 12, 2025. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- O-3.22 This comment asserts that the EIR for the Proposed Project underestimates the combined impacts of all three projects. Specifically, it notes that the South Campus Project EIR identified significant and unavoidable traffic impacts, while the Proposed Project found cumulative traffic impacts associated with the Proposed Project would be less than significant. The comment argues that "given the existence of significant unavoidable cumulative traffic impacts from a nearby related project, the DEIR for the proposed Project clearly erred in finding that the proposed Project's surface traffic impacts were less than significant and contribution to cumulative traffic impacts was less than cumulatively considerable." This assertion, however, is incorrect. Just because a separate project has a significant and unavoidable impact does not mean that contributions from all future projects would be cumulatively considerable.

As discussed in Section 3.12, Transportation, of the EIR, per WRCOG guidelines, if the baseline project VMT would result in a less-than-significant impact, then cumulative analysis may not be required. The WRCOG study also notes that if a project is consistent with the regional transportation plan/sustainable communities strategy, then the cumulative impacts shall be considered less than significant subject to consideration of other substantial evidence. As shown in Table 3.12-2 of the EIR, because the VMT per employee estimated for the Proposed Project does not exceed the WRCOG significance threshold under base year with Proposed Project conditions, it would also imply a less-than-significant cumulative impact. Additionally, the cumulative (Year 2045) VMT per employee of 20.11 is below the baseline threshold of 25.47 VMT per employee. The Proposed Project's impact on VMT would be less than

significant. The Proposed Project is consistent with the overarching goals of Connect SoCal because it would encourage regional economic prosperity and global competitiveness; improve mobility, accessibility, reliability, and travel safety for people and goods; and adapt to a changing climate and support an integrated regional development pattern and transportation network to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region. Therefore, per WRCOG guidance it would have a less-than-significant VMT impact under cumulative conditions. Hence, the Proposed Project's cumulative impact would be less than cumulatively considerable.

Although VMT is the metric used to evaluate transportation impacts under CEQA, the comment makes several references to surface traffic impacts. The Proposed Project's Traffic Analysis (Appendix M-1) provides analysis of level of service for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated level of service) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA.

- 0-3.23 This comment again asserts that the three projects are "functionally related" and are being processed concurrently but separately. The comment also notes that though the projects "began their environmental review by the same consultant within a year of each other, they were analyzed using different cumulative project lists." As discussed herein and shown in Table 3-1 of the EIR, both of the projects the comment asserts should be analyzed cumulatively with the Proposed Project, the Upper Plateau Project and the South Campus Project, are included in the list of cumulative projects in the EIR. As such, the EIR's cumulative analyses accounted for these projects. The comment asserts that "there are inconsistencies in the descriptions of these three developments between the EIR narratives and the cumulative projects lists in the EIRs for the other two functionally related developments;" however, the comment does not specify any such inconsistencies beyond attaching the cumulative project lists for each project. The notice of preparation (NOP) for the South Campus EIR was released in May 2020 and the South Campus Project was approved in January 2021.26 The NOP for the Proposed Project was released in March 2021. The NOP for the Upper Plateau Project EIR was released in November 2021.²⁷ Each EIR explains how the respective cumulative project lists were developed. The cumulative lists were developed at different points in time through consultation with the adjacent local agencies. The March Joint Powers Commission denied the Upper Plateau Project on May 12, 2025. Lastly, the comment asserts that the cumulative project lists have been "inappropriately constrained by distance assumptions" but provides no further explanation.
- O-3.24 This comment asserts that the list of cumulative projects "fails to contain a number of cumulative projects included on the cumulative projects list for a nearby warehouse project, the Rider and Patterson Business Center project in the County of Riverside." Per CEQA Guidelines Section 15125, the environmental baseline for a project is established by the date on which the NOP is filed. The NOP for the Rider project was published on November 28, 2022. As discussed in the EIR and shown in Appendix A of the EIR, the NOP for the Proposed Project was published on March 31, 2021. As discussed in Chapter 3, Environmental Analysis, the cumulative projects list was developed through

https://ceqanet.opr.ca.gov/Project/2020059028.

 $^{^{27} \}quad \text{https://ceqanet.opr.ca.gov/Project/2021110304}.$

https://files.ceqanet.opr.ca.gov/283643-1/attachment/kSZ43zDRbz796ebPFsnwXg_aey42tn9mDtWTz7MeNTN9j-NEt_fQVhps4kAR3CyNYn6ovyy7fNqnEdFb0.

consultation with planning and engineering staff from March JPA, the City of Riverside, the City of Moreno Valley, the City of Perris, and the County of Riverside to include key projects in their respective jurisdictions.

- O-3.25 This comment asserts that the cumulative project list is insufficient. See Responses O.3-23 and O.3-24, above. The comment further asserts that "the JPA needs to prepare one EIR that addresses all of the proposed developments within the JPA and Foreign Trade Zone 244." Asking either March JPA or MIPAA to prepare one EIR for all proposed developments within the March JPA Planning Area is akin to a city preparing one EIR for all development projects within that city. Such an analysis would not be helpful nor is it required by CEQA. Further, while March JPA is the grantee of Foreign-Trade Zone (FTZ) 244, this FTZ comprises the majority of western Riverside County.²⁹ This request also goes far beyond the requirements of CEQA.
- **0-3.26** This comment summarizes previous comments related to the cumulative projects list and analysis of cumulative impacts. Please see Responses 0.3-19 to 0.3-25, above.
- O-3.27 This comment asserts that the EIR lacks an accurate and stable project description, generally referencing previous comments. Please see Responses O.3-10 to O-3.22, above. Chapter 2, Project Description, of the EIR describes the whole of the action. The description of the Proposed Project in the EIR is accurate, stable, and finite.
- O-3.28 This comment asserts that the EIR contains mitigation measures that have either not been demonstrated to be feasible or are inadequate as written. It alleges that "a number of the mitigation measures require that the Proposed Project plans include certain requirements, but there is no requirement that the Proposed Project as built contain these features or requirement for demonstration of compliance prior to issuance of the occupancy permit (see for example MM-AQ-2 through AQ-4)." All mitigation measures will be enforced through the MMRP.

MM-AQ-2 (Construction Requirements) contains construction requirements relating to air quality impacts. Contrary to the comment's assertion, MM-AQ-2 requires the applicant to provide evidence that its construction plans contain the requirements and restrictions detailed in MM-AQ-2 prior to the issuance of a grading permit and/or building permit. Further, MIPAA's general practice is to conduct regular on-site inspections during construction.

MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires building and landscape design features relating to improved energy efficiency and water reduction. Here again, contrary to the comment's assertion, MIPAA shall confirm prior to the issuance of a building permit that building plans include the required measures outlined in **MM-AQ-3**. They would be additionally confirmed during final inspection for the building permit. Similarly, the tenant agreement requirements outlined in **MM-AQ-3** are to be confirmed by MIPAA prior to the issuance of a certificate of occupancy.

Lastly, MM-AQ-4 (Truck Requirements) contains truck requirements related to building design and antiidling, all of which must be confirmed by MIPAA prior to either a building permit or a certificate of occupancy.

March JPA. 2018. "Foreign Trade Zone #244: Service Area" [map]. https://www.marchjpa.com/documents/docs_forms/ 04292019_FTZ244_Service_Area_Map_w-FTZ_header.pdf.

The comment additionally asserts that "several of the mitigation measures allow the tenant to violate the mitigation 'if necessary' or unfeasible" and cites **MM-AQ-6A** (Additional Air Quality Tenant Requirements) as an example. **MM-AQ-6A** provides the following:

Additional Air Quality Tenant Requirements. Prior to issuance of a certificate of occupancy, MIPAA shall confirm any tenant agreement includes the following:

A. Tenant shall not use diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating to MIPAA'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 (BACT) 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. Tenant shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions.

Before a tenant could use diesel backup generators, the tenant would have to provide documentation to MIPAA demonstrating there are no other backup energy sources available. Even then, **MM-AQ-6A** provides standards for such diesel backup generators. **MM-AQ-6A** provides sufficient direction and parameters in the event a diesel backup generator is needed.

- O-3.29 This comment alleges that the EIR is flawed because it did not analyze the indirect impacts of the Proposed Project resulting from its facilitation of the growth of warehousing in the area. As discussed in Section 4.5, Growth-Inducing Impacts, of the EIR, induced growth is any growth that exceeds planned growth and results from new development that would not have taken place in the absence of that project. As shown in Table 6 of the Southern California Association of Governments' Connect SoCal 2024 Demographics and Growth Forecast Technical Report,³⁰ the Transportation and Warehousing industry sector is anticipated to grow 11.8% between 2000 and 2050. Further, there is already a need in the existing market for air cargo services. One of the objectives included in Section 2.3, Project Objectives, in the EIR is to "more fully utilize the operations capacity of the MIP Airport to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region." The comment does not provide any evidence that the Proposed Project would induce growth in excess of planned growth.
- O-3.30 This comment quotes information from the March JPA website regarding the March Inland Port Airport and Foreign Trade Zone 244 and asserts that the Proposed Project "will clearly facilitate the growth of warehousing in the FTZ area." The comment does not provide any evidence that the Proposed Project would induce growth in excess of planned growth. See Response O-3.29, above.
- **0-3.31** This comment quotes goals and policies of the March JPA General Plan related to March Inland Port Airport development and asserts, again, that the EIR is "required to analyze the proposed Project's indirect impacts resulting from its inducement of the growth of warehousing facilities within the JPA

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³⁰ SCAG (Southern California Association of Governments). Demographics & Growth Forecast. April 4, 2024. https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf?1712261839.

and is the FTZ." The comment does not provide any evidence that the Proposed Project would induce growth in excess of planned growth. See Response 0-3.29, above.

- **0-3.32** This comment notes, again, that the prior environmental documents and studies associated with the General Plan are more than 24 years old. See Responses 0-3.10 through 0-3.12, above.
- **0-3.33** This comment quotes CEQA Guidelines Sections 15064(d) and 15358 and asserts again that JPA was required to analyze the indirect impacts of the Proposed Project, including the reasonably foreseeable indirect impacts resulting from the two related warehousing projects. See Response to Comments 0-3.10 through 0-3.12, above.
- **0-3.34** This comment again asserts that the cumulative impacts analysis in the EIR is inadequate. Please see Responses 0-3.22 to 0-3.25, above.

The comment further requests that Table 3-1 of the EIR include state clearinghouse numbers. CEQA does not require lead agencies to provide every study or piece of information requested.

- **0-3.35** This comment quotes CEQA Guidelines Section 15126.2(e) and page 4.5 of the EIR, asserting that the Proposed Project "completely ignores the fact that the proposed Project is designed to expand air cargo infrastructure in the region." See Response 0-3.29, above.
- **0-3.36** This comment asserts again that the EIR fails to analyze growth-inducing impacts. See Response 0-3.29, above.
- O-3.37 This comment serves as a general conclusion and asserts, for the reasons stated in the comment letter, that the EIR must be recirculated. Responses to specific concerns raised with the EIR, see Responses O-3.1 to O-3.36. Commenter requests to receive notices of hearings, votes, and determinations associated with the Proposed Project and further incorporates by reference the exhibits attached to the comment letter.
- **0-3.38** This comment lists the letter's attachments. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

II.5 Responses to FAQs

Comment letters received regarding the Proposed Project include various repeated questions related to the Proposed Project and EIR. Many of the letters included a similar set of introductory comments, which are responded to in the following discussion. Specific questions are addressed in the following Frequently Asked Questions (FAQs) tables in Section II.5.2, FAQ Response Tables, provided after FAQ Letter I in this section.

The FAQ tables are organized by topic as follows:

- Aesthetics (AES)
- Agriculture (AG)
- Air Quality (AQ)
- Biological Resources (BIO)
- Cultural Resources (CUL)
- Energy (ENG)
- Environmental Justice (EJ)
- Geology and Soils (GEO)
- Greenhouse Gas Emissions (GHG)
- Hazards and Hazardous Materials (HAZ)
- Hydrology and Water Quality (HYD)

- Land Use and Planning (LUP)
- Miscellaneous (MISC)
- Noise (NOI)
- Population and Housing (POP)
- Process (PROCESS)
- Public Services (PUB)
- Recreation (REC)
- Transportation (TRA)
- Utilities and Service Systems (UTL)
- Wildfire (FIRE)
- Cumulative (CUMUL)

The FAQs raise no specific issues, questions, or concerns regarding the adequacy of the environmental analysis in the EIR. The mitigation measures referenced in the FAQ responses can be found in Chapter IV of this Final EIR.

II.5 - RESPONSES TO FAQS

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FAQ Letter I

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.	FAQ-I.1
The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.	FAQ-I2
The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.	FAQ-I3
Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.	FAQ-I.4
I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.	FAQ-I.5

II.5 - RESPONSES TO FAQS

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II.5.1 FAQ Responses

- **FAQ-I.1** This comment raises general concerns about the analysis of the EIR. Specific comments are addressed in the following responses.
- This comment addresses general CEQA requirements, including formulation of project alternatives. The EIR and its technical reports analyzed the Proposed Project without bias. Chapter 5, Alternatives, of the EIR analyzed a reasonable range of alternatives in compliance with CEQA. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- FAQ-I.3 This comment raises concerns about noise impacts to residential neighborhoods to the west of I-215 and northwest of March ARB/Inland Port Airport. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contour map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14.078), F-15E (1,216), KC-135R (5,810), MO-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based upon the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (Draft EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations."31 As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest.

The comment further raises concerns about March ARB/Inland Port Airport cargo operations in 2005-2008, apparently referring to DHL operations that are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.³² As of 2024, there were fewer than 20 DC-9s still in service.³³ Developed in the 1960s prior to international and FAA noise

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

³³ https://simpleflying.com/dc-9-operators-2024/

standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.³⁴ This Project is not related to past cargo operations and is separate from the 2005–2008 DHL cargo flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- FAQ-I.4 This comment generally claims the EIR contains errors and omissions but does not identify any specific concerns. The comment raises general concerns regarding claims made by past developers and March JPA but does not identify any specific claims. This comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- FAQ-I.5 This comment expresses general concerns regarding the viability of the Proposed Project and its effect on quality of life. The EIR discloses the potential environmental impacts of the Proposed Project and imposes all feasible mitigation to address potentially significant impacts. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

II.5.2 FAQ Response Tables

Table II.5-1. Aesthetics FAQ Responses

Identifier	Question	Response
FAQ-AES-1	Are there any plans to address the potential increase in light pollution and disruption of natural night skies?	Section 3.1, Aesthetics, of the EIR addresses Proposed Project—related lighting increases to the existing nighttime environment. Once constructed, the Proposed Project would have exterior-wall-mounted lighting on the building façade and overhead-pole-mounted lighting in the parking lots, including the proposed trailer storage area along the southern boundary of the project site and along interior access roads. Lighting associated with the Proposed Project would be of a similar nature and distribution as the lighting sources currently installed on warehouse and distribution facility properties in the surrounding area. In addition, as explained in Chapter 2, Project Description, of the EIR, outdoor lighting on the project site would contain full-cutoff fixtures and operate at a maximum of 2,700 kelvin and 750 watts. The proposed use of full-cutoff lighting fixtures and the downward direction of all lighting sources would minimize the potential for outdoor lighting sources to produce sky glow and glare that would be experienced by off-site viewers. As demonstrated in the preliminary photometrics/light trespass plans prepared for the Proposed Project (see EIR Figures 3.1-1a and 3.1-1b), the output of new exterior-wall-mounted lighting sources and pole-mounted lighting sources in car and truck parking/storage areas would not exceed 0.5 foot-candles at the property line of the project site, which is consistent with March JPA Development Code Section 9.08.100.
		As detailed in EIR Table 2.1, during the peak season (i.e., late November through late December), the Proposed Project is anticipated to have a maximum of 21 flights per day, 6 days per week, over a 4-week period. While the Proposed Project would result in an increase in nighttime aircraft operations, which in turn would result in an increase in night aircraft lighting over existing conditions, the additional flights during evening and nighttime hours are not anticipated to result in a level of illumination that could substantially affect the quality of existing nighttime views in the area. Daily evening and night arrivals and departures would be limited, aircraft lighting from individual planes would be transient, and aircraft lighting would be of a similar intensity as lighting associated with existing aircraft in the immediate area.
		In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details.
FAQ-AES-2	Are there any plans to address the potential loss of scenic views and natural landscapes caused by the Proposed Project?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, Exhibit 5-4, Scenic Corridors/Gateway, of the March JPA General Plan identifies non-specific areas in the West March Planning Area to the north and south of Van Buren Boulevard that provide views to the northeast and east as Scenic Vistas. While Van Buren Boulevard in the West March Planning Area is identified as a scenic corridor, there are no scenic corridors (or designated view corridors) near the project site designated as such by March JPA or the City of Moreno Valley General Plan.

Table II.5-1. Aesthetics FAQ Responses

Identifier	Question	Response
		The project site is primarily vacant and undeveloped. Distant mountains are visible from nearby locations including I-215 and Heacock Street. Specifically, public views to regional mountains to the northeast and east of the project site are available from the nearby segment of I-215. Views to the San Bernardino and San Jacinto Mountains are available to I-215 motorists near the project site. Regarding Heacock Street, views of the Box Springs Mountains are temporarily experienced by pedestrians and motorists traveling north on Heacock Street.
		Despite the available mountain views from I-215 and Heacock Street near the project site, neither the interstate nor Heacock Street is identified as a scenic highway, scenic road, or scenic vista point. Further, the project site is approximately 0.85 miles east of the interstate and is surrounded by existing warehouse developments that have altered existing viewing conditions from the interstate (and Heacock Street). For example, the existing buildings to the east and south of the project site are estimated to be approximately 40 to 50 feet high. Although construction of a new 45-foot-tall cargo building on the site would introduce a new structure that would be visible from the interstate and local roads including Heacock Street, there are existing warehouse developments immediately east and south of the site that are of a similar height to the proposed cargo building. As such, the Proposed Project would not have a substantial impact on views toward the Box Spring Mountains and San Bernardino Mountains from Heacock Street or views to regional mountains to the north and northeast of the project site from I-215. In addition, due to the distance between I-215 and the project site (approximately 0.85 miles) and the visual prominence of the San Bernardino (11,499 feet of elevation at the highest peak) Mountains, the apparent scale of the proposed cargo building (maximum height of 45 feet) would be reduced and the new building would not substantially alter or block public views of the San Bernardino or San Jacinto Mountains from I-215. As such, impacts would be less than significant.
FAQ-AES-3	Are there any plans to implement dark sky initiatives to reduce light pollution?	As discussed in Section 3.1, Aesthetics, of the EIR, the project site is located in an urbanized area containing multiple existing sources of nighttime lighting. For example, industrial warehouse facilities occupied by Hanes/DDI (the former Phillips Warehouse Building at 16875 Heacock Street) and an air cargo center occupied by KRIV-Amazon (17101 Heacock Street) are located to the immediate south of the project site, and the existing Lowe's distribution and warehouse center is located east of the site, across Heacock Street. These facilities include internal and external (i.e., general illumination and security) lighting, as well as parking lot and roadway lighting, which is visible from the project site. In addition to lighting associated with nearby facilities, streetlights are present along the Heacock Street corridor. March ARB aviation facilities, taxiways, and runways are an additional source of night lighting in the landscape surrounding the area.
		While the Proposed Project does not propose to implement a specific dark sky initiative, the Proposed Project would incorporate common BMPs to reduce the potential for substantial light pollution during project operations. For example, the Proposed Project would install lighting only

Table II.5-1. Aesthetics FAQ Responses

Identifier	Question	Response
		where it is needed for operations, and new sources of lighting would consist of full-cutoff fixtures that would be directed downward onto the site. As demonstrated in the preliminary photometrics/light trespass plans prepared for the Proposed Project (see EIR Figures 3.1-1a and 3.1-1b), the output of new exterior-wall-mounted lighting sources and pole-mounted lighting sources in car and truck parking/storage areas would not exceed 0.5 foot-candles at the property line of the project site, which is consistent with March JPA Development Code Section 9.08.100. With implementation of these measures/practices, potential impacts associated with new sources of Proposed Project-related lighting would be less than significant.
FAQ-AES-4	Are there any plans to preserve or enhance the natural beauty of the project site?	Existing development within the project site consists of one groundwater monitoring well (located in the northeast portion of the project site), a former (now vacant) fire house, paved taxiway and tarmac areas associated with aviation uses, and various paved improvements located next to the existing taxiway, as shown in Figure 2-1 of the EIR. The majority of the project site is vacant, undeveloped, and routinely mowed. Construction of the Proposed Project would change the overall visual character of the site from primarily undeveloped to developed; the proposed land uses to be developed within the site would be similar in nature to the surrounding land uses. The project site is surrounded by March ARB aviation facilities to the north and west, as well as various industrial warehousing buildings to the south, a distribution center facility to the east, and the March ARB Fire Department facility to the north. The existing warehouse and distribution buildings to the east and south are estimated to be approximately 40 to 50 feet high, which is similar in height to the proposed cargo building (45 feet). Within the larger surrounding area, the Proposed Project is surrounded by additional aircraft operation facilities, including the March ARB runways and aircraft parking pads; I-215 and the Riverside National Cemetery to the west; and industrial land uses to the east. Thus, the construction and operation of the Proposed Project would blend in with the existing visual character of the larger surrounding area.
FAQ-AES-5	Has the Proposed Project considered the potential increase in light pollution from the airport operations?	Section 3.1.4, Impacts Analysis (subheading March ARB Taxiway Lighting Impacts), of the EIR addresses potential lighting impacts associated with both taxiway lighting and increased aircraft operations. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details.
		Additionally, new runway lighting is regulated by FAA in terms of location, type, and height and would be generally similar to existing March ARB lighting surrounding the project site. Such lighting would be low intensity, shielded, and directional. The nearest residential uses, approximately 0.50 miles east of the project site, would be visually buffered from the Proposed Project building by existing warehouse development. Due to the presence of intervening structures and distance from the project site, light and glare impacts from runway lighting would be less than significant for the nearest residential uses to the east of the project site.

Table II.5-1. Aesthetics FAQ Responses

Identifier	Question	Response
FAQ-AES-6	How will the Proposed Project affect the visual aesthetics of the surrounding area?	Please refer to FAQ-AES-4, above.
FAQ-AES-7	How will the Proposed Project impact the overall landscape aesthetics and scenic beauty of the area?	Please refer to FAQ-AES-2, above.
FAQ-AES-8	How will the Proposed Project impact the overall landscape and visual aesthetics of the surrounding area?	Please refer to FAQ-AES-4, above.
FAQ-AES-9	How will the Proposed Project impact the overall light pollution in the region?	As discussed in Section 3.1, Aesthetics, of the EIR, the cumulative study area for lighting and glare impacts includes the areas in the immediate vicinity of the project site and off-site roadways that could experience light spillover and glare effects. All lighting proposed for the Proposed Project would be subject to compliance with the provisions of the March JPA Development Code, which would ensure proper design, installation, and operation of all exterior lighting, thereby reducing the potential for glare effects and light spillover onto adjacent properties. Other projects within the aesthetic cumulative project area would be required to comply with existing regulations pertaining to light and glare, and any project occurring within March ARB would be required to comply with applicable FAA regulations pertaining to light and glare. Additionally, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details. Therefore, the Proposed Project's contribution to a cumulative light and glare impact would be less than significant.
FAQ-AES-10	How will the Proposed Project impact the visual aesthetics of the surrounding area?	Please refer to FAQ-AES-4, above.
FAQ-AES-11	What measures are in place to address potential light trespass issues for nearby residents?	Please refer to FAQ-AES-1 and FAQ-AES-3, above.

Table II.5-1. Aesthetics FAQ Responses

Identifier	Question	Response
FAQ-AES-12	What steps will be taken to minimize light pollution from the Proposed Project?	Please refer to FAQ-AES-1, above.
FAQ-AES-13	What steps will be taken to minimize light pollution from the Proposed Project's operations?	Please refer to FAQ-AES-1 and FAQ-AES-3, above.
FAQ-AES-14	Are there any plans to address the potential increase in light and noise pollution from the Proposed Project's operations?	Please refer to FAQ-AES-1 and FAQ-AES-3, above, and FAQ-NOI-3 for further discussion of Proposed Project noise.

Table II.5-2. Agriculture FAQ Responses

Identifier	Question	Response
FAQ-AG-1	Are there any plans to mitigate the potential loss of agricultural land due to the Proposed Project?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the project site is not located within existing agricultural areas, nor would implementation of the Proposed Project result in any impacts to ongoing agricultural operations or the conversion of farmland to non-agricultural use. The site is surrounded by existing facilities associated with March ARB and air cargo operations. Therefore, no impacts to agriculture would occur and no mitigation is required.

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
FAQ-AQ-1	Are there any plans to address the potential increase in air pollution resulting from the Proposed Project?	As discussed in Section 3.2, Air Quality, of the EIR, the increase in criteria air pollutant emissions from construction of the Proposed Project would be reduced to less than significant through implementation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). The Proposed Project's daily regional emissions from ongoing non-peak and peak operations would exceed SCAQMD's operational thresholds of significance for emissions of VOCs, NO _x , and CO. Most of the VOC, NO _x , and CO emissions would be from aircraft, but there is no feasible mitigation to reduce these emissions because aircraft technology to control emissions has not been developed. Research is ongoing for controlling VOC, NO _x , and CO emissions and improving fuel efficiencies. Implementation of MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
		(Additional Air Quality Tenant Requirements) and MM-GHG-1 (Installation of EV Charging Stations) would reduce criteria air pollutant emissions from operation of the Proposed Project. However, CalEEMod cannot accurately quantify these reductions; therefore, no numeric emissions credit has been taken in the analysis and this impact would remain significant and unavoidable.
FAQ-AQ-2	Are there any plans to mitigate the Proposed Project's impact on air quality?	Please refer to FAQ-AQ-1, above.
FAQ-AQ-3	Are there any plans to monitor and report on air quality data in real-time?	Real time air quality is monitored by SCAQMD. The Proposed Project is located within SRA 24. The SCAQMD Perris Valley monitoring station is 5.7 miles south of the project site and is the nearest long-term air quality monitoring site for O ₃ and PM ₁₀ . The Perris Valley monitoring station does not include data for CO, NO ₂ , or PM _{2.5} . The Metropolitan Riverside County monitoring station, located in SRA 23 approximately 12.7 miles northwest of the project site, is the next nearest monitoring station for CO, NO ₂ , and PM _{2.5} . These two monitoring stations provide real time air quality data for the project area.
FAQ-AQ-4	Has the Proposed Project considered the potential health risks associated with increased pollution?	Section 3.2, Air Quality, of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13 of the EIR, the Proposed Project would not exceed the SCAQMD LSTs during construction with the incorporation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14 of the EIR, the Proposed Project would not exceed the SCAQMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Proposed Project construction and operation. The Proposed Project HRA (Draft EIR Appendix C-1) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
FAQ-AQ-5	Has the Proposed Project considered the potential health risks associated with poor air quality?	Please refer to FAQ-AQ-4, above. Section 3.2, Air Quality, of the EIR discussed potential health effects from criteria air pollutants. However, it would be extremely difficult, if not impossible, to quantify health impacts of criteria pollutants for various reasons, including modeling limitations and where in the atmosphere air pollutants interact and form, for a development as small as the Proposed Project (see Amicus Curiae Briefs of SCAQMD and the San Joaquin Valley Air Pollution Control District in Sierra Club v. County of Fresno [2018] 6 Cal.5th 502 [Friant Ranch], and EIR Appendix C-2). Currently available

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
		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.
		Two expert agencies, SCAQMD and SJVAQCD, 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, SCAQMD has not released any additional Friant Ranch guidance. Any attempt to quantify the Proposed Project's health risks would be considered unreliable and misleading. Lastly, as demonstrated in the EIR construction and operational LST (NOx, CO, PM10, and PM2.5) analyses and the CO hot spot assessment, the Proposed Project is not anticipated to result in localized criteria pollutant impacts; therefore, no associated health effects are anticipated to result.
FAQ-AQ-6	Has the report considered the long-term effects of the Proposed Project on the local climate and microclimate?	As required by CEQA, the EIR provided an overall description of potential climate change impacts for the region. EIR Section 3.7, Greenhouse Gas Emissions, discussed the Proposed Project's impacts on climate change and determined the Proposed Project would have less-than-significant impacts with mitigation (MM-GHG-1 [Installation of EV Charging Stations] and MM-AQ-3 [Improved Energy Efficiency and Water Reduction] through MM-AQ-6 [Additional Air Quality Tenant Requirements]). In general, changes to a local climate and microclimate may be caused by alterations in land use, vegetation, building materials, and energy consumption. The urban heat island effect can be caused by large-scale development projects where natural landscapes are replaced with concrete, asphalt, and buildings. The Proposed Project would not remove natural vegetation as the project site consists of hardscape and any vegetation is regularly mowed to ensure vegetation does not interfere with aircraft operations.
		Tall buildings may alter wind patterns; however, the Proposed Project would be height-limited to comply with airport land use zoning. The removal of large, vegetated areas may result in changes in humidity and precipitation; however, as noted above, the Proposed Project would not remove large, vegetated areas. The Proposed Project would not alter existing habitat or local water bodies. Section 3.2, Air Quality, of the EIR determined that localized impacts from criteria air pollutant concentrations would be less than significant.
FAQ-AQ-7	How are operational emissions, including CO ₂ , CH ₄ , and N ₂ O, being managed and mitigated by the Proposed Project, especially concerning energy consumption,	Section 3.7, Greenhouse Gas Emissions, of the EIR evaluated the impact of GHG emissions, including CO ₂ , CH ₄ , and NO ₂ , utilizing March JPA's qualitative threshold and determined the Proposed Project would have less-than-significant impacts with implementation of MM-GHG-1 (Installation of EV Charging Stations) and MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6 (Additional Air Quality Tenant Requirements).
	water supply treatment, and solid waste sources?	For informational purposes, Section 3.7 of the EIR quantified the Proposed Project's GHG emissions. The analysis used professional standards to estimate the Proposed Project's construction and operational emissions using CalEEMod and the FAA AEDT model. The

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
		modeling accounted for emissions associated with energy consumption, water supply treatment, and solid waste.
		MM-AQ-3 through MM-AQ-6 would have the co-benefit of reducing GHG emissions in addition to criteria air pollutant emissions; however, CalEEMod cannot accurately quantify these reductions. Therefore, no numeric emissions credit was taken in the analysis. MM-GHG-1 is quantifiable, and the emission reductions associated with this measure were reported in the EIR. The reduction in GHG emissions is approximately 170 MT CO ₂ e, which is 0.7% of the emissions total. Table 3.7-10 of the EIR shows the Proposed Project's GHG emissions without mitigation and Table 3.7-11 shows the Proposed Project's GHG emissions with mitigation.
FAQ-AQ-8	How does the Proposed Project plan to address emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment?	Section 3.2, Air Quality, and Section 3.7, Greenhouse Gas Emissions, in the EIR disclosed the criteria air pollutant and GHG emissions associated with operation of the Proposed Project, including on-site cargo handling equipment. As discussed in the EIR, it is common for cargo buildings to require the operation of exterior cargo handling equipment in the building's truck court areas. For the Proposed Project, on-site modeled operational equipment includes up to one 200 hp compressed natural gas or gasoline-powered tractor/loader/backhoe operating at 4 hours a day for 365 days of the year. MM-AQ-3(C) (Tenant Agreement Requirements) requires the use of 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 CARB Tier 4 Final regulations for off-road vehicles. As an alternative, hydrogen fuel-cell or compressed natural gas powered equipment shall also be acceptable.
FAQ-AQ-9	How will the Proposed Project affect the overall air quality in the region?	Section 3.2, Air Quality, of the EIR disclosed that the Proposed Project's operational-source emissions would exceed the applicable SCAQMD regional thresholds for VOCs, NO _X , and CO, even with the implementation of MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6 (Additional Air Quality Tenant Requirements). Further, the Proposed Project would have significant and unavoidable impacts related to potential conflicts with the SCAQMD AQMP, which is the regional plan for achieving federal and state air quality standards.
FAQ-AQ-10	How will the Proposed Project impact the local air quality and emission levels in the region?	Section 3.2, Air Quality, of the EIR disclosed that the Proposed Project's operational-source emissions would exceed the applicable SCAQMD regional thresholds for VOCs, NOx, and CO, even with the implementation of MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6 (Additional Air Quality Tenant Requirements). In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13 of the EIR, the Proposed Project would not exceed the SCAQMD LSTs during construction with

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
		the incorporation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14 of the EIR, the Proposed Project would not exceed the SCAQMD LSTs during operations.
FAQ-AQ-11	How will the Proposed Project impact the overall air quality in the region?	Please refer to FAQ-AQ-10, above.
FAQ-AQ-12	What measures are being taken to reduce emissions associated with the transportation of goods and vehicles related to the Proposed Project, as mentioned in the report?	As discussed in Section 3.2, Air Quality, MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the annual provision of information regarding the Voluntary Interindustry Commerce Solutions "Empty Miles" program; health effects of DPM, state regulations limiting truck idling time, and the benefits of minimized idling; the importance of minimizing traffic, noise, and air pollutant impacts to sensitive receptors; and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. MM-AQ-4 (Truck Requirements) requires the Proposed Project to be designed to accommodate SmartWay trucks, to include conduit and electrical panels to support future electric trucks, to prohibit idling in excess of 3 minutes, to seek funding to replace/retrofit trucks, and to monitor and comply with air quality regulations pertaining to 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. MM-AQ-5 (Commute Trip Reduction) requires measures to reduce commute-trips associated with employees. All of the above listed measures serve to reduce emissions associated with transportation of goods and vehicles related to the Proposed Project.
FAQ-AQ-13	What measures are in place to address potential health risks associated with the Proposed Project?	As discussed in FAQ-AQ-4, above, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. MM-AQ-1 (Construction Management Plan) requires the use of Tier 4 offroad equipment during Project construction. MM-AQ-2 (Construction Requirements) through MM-AQ-6 (Additional Air Quality Tenant Requirements) would reduce Proposed Project emissions, further reducing potential health risks.
FAQ-AQ-14	What measures are in place to address potential respiratory issues from increased air pollution?	As discussed in Section 3.2, Air Quality, of the EIR, MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements) would serve to reduce criteria air pollutants. Specifically, MM-AQ-2 (Construction Requirements) prohibits grading on days with an Air Quality Index forecast greater than 150 for particulates or ozone and requires the use of "Super-Compliant" low VOC paints formulated to exceed SCAQMD Rule 1113. MM-AQ-4 (Truck Requirements) prohibits idling in excess of 3 minutes. As discussed in FAQ-AQ-5, above, the EIR disclosed potential health effects from criteria pollutants, but it would be extremely difficult, if not impossible, to quantify health impacts of criteria pollutants for various reasons, including modeling limitations and where in the atmosphere air pollutants interact and form, for a development as small as the Proposed Project (Appendix C-2).

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
FAQ-AQ-15	What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment to minimize environmental impact?	Please refer to FAQ-AQ-8, above.
FAQ-AQ-16	What specific goals and policies from the Local March Joint Powers Authority General Plan are being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	Section 3.10, Land Use and Planning, and Table 3.10-1 of the EIR demonstrate how the Proposed Project is consistent with the applicable goals and policies of the March JPA General Plan related to GHG emissions, noise, and air quality. These include, but are not limited to, Noise/Air Quality Element Goal 1 (Ensure that land uses are protected from excessive and unwanted noise), Policy 2.2 (Noise generating facilities shall be located in areas with compatible 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), and Goal 4 (Pursue reduced emissions for stationary and mobile sources through the use and implementation of new and advancing technologies) and Environmental Justice Element Policy 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 GHG emissions to avoid or minimize creating adverse conditions for adjacent communities). As discussed in Table 3.10-1, the Proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Where appropriate, mitigation measures are included to reduce and/or avoid potential conflicts with applicable goals adopted for the purpose of avoiding or mitigating GHG, noise, and air quality impacts, including MM-NOI-1 (Construction Worker Hearing Protection) and MM-NOI-2 (Future Tenant Aircraft Fleet), MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements), and MM-GHG-1 (Installation of EV Charging Stations).
FAQ-AQ-17	What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential hazards?	The Proposed Project is sited in a location that would not result in a localized impact to sensitive receptors located in housing, schools, childcare facilities, and hospitals. The nearest sensitive receptor is approximately 0.5 miles east of the project site. As demonstrated in Section 3.2, Air Quality, of the EIR, based on construction and operational LST (NO ₂ , CO, PM ₁₀ , and PM _{2.5}) analyses and the CO hot spot assessment, the Proposed Project is not anticipated to result in localized criteria pollutant impacts.
		The Proposed Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
		Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
		Lastly, as identified in Section 3.8, Hazards and Hazardous Materials, of the EIR, the Proposed Project would have less-than-significant impacts related to hazards and hazardous materials with the incorporation of MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires the approval of a Hazardous Materials Contingency Plan prior to the issuance of a grading permit; MM-HAZ-2 (Stop Work, Groundwater Management), which requires stop work orders and groundwater management relating to the existing soil vapor extraction system; and MM-HAZ-3 (Wildlife Protective Measures), which requires that the Proposed Project incorporate recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) for the Proposed Project.
		The EIR includes numerous mitigation measures that will lessen impacts and protect the public, including MM-AQ-1 through MM-AQ-6 (Additional Air Quality Tenant Requirements), MM-GHG-1 (Installation of EV Charging Stations), MM-HAZ-1 through MM-HAZ-3, MM-HYD-1 (Water Quality BMPs), MM-NOI-1 (Construction Worker Hearing Protection), MM-NOI-2 (Future Tenant Aircraft Fleet), MM-TRA-1 (Construction Traffic Management Plan), and MM-TRA-2 (Project Truck Route on Heacock Street).
FAQ-AQ-18	Has the report thoroughly assessed the risk of air and water pollution from the Proposed Project's operations?	The EIR prepared for the Proposed Project includes a thorough assessment of air quality impacts in Section 3.2, Air Quality, with details of the analysis provided as Appendix B-1 and C-1. The analysis was prepared consistent with professional standards using SCAQMD-approved modeling tools and comparing impacts with thresholds of significance established by SCAQMD, an expert agency in air quality.
		Water pollution was thoroughly addressed in Section 3.9, Hydrology and Water Quality, with supporting technical appendices provided as K-1 and K-2 in the EIR.
FAQ-AQ-19	What measures are in place to mitigate the potential increase in air and noise pollution from the Proposed Project's operations?	MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements) and MM-GHG-1 (Installation of EV Charging Stations) would reduce criteria air pollutant emissions. MM-NOI-2 (Future Tenant Aircraft Fleet) would require documentation prior to issuance of a certificate of occupancy that expected noise emissions from the tenant's aircraft mix do not exceed the noise impacts identified and disclosed in the EIR. Please refer to FAQ-NOI-3 for further discussion regarding noise.
FAQ-AQ-20	What measures are in place to protect the local population from exposure to harmful pollutants and toxins?	As discussed in FAQ-AQ-4, above, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. MM-AQ-1 (Construction Management Plan) requires the use of Tier 4 offroad equipment during Project construction. MM-AQ-2 (Construction Requirements) through MM-AQ-6 (Additional Air Quality Tenant

Table II.5-3. Air Quality FAQ Responses

Identifier	Question	Response
		Requirements) would reduce Project emissions, further reducing potential health risks. Please also refer to FAQ-AQ-17, above.
FAQ-AQ-21	What measures are in place to protect vulnerable populations, such as children and the elderly, from the Proposed Project's negative impacts?	Please refer to FAQ-AQ-4, FAQ-AQ-5, FAQ-AQ-13, FAQ-AQ-14, FAQ-AQ-17, and FAQ-AQ-20, above.

Table II.5-4. Biological Resources FAQ Responses

Identifier	Question	Response
FAQ-BIO-1	Are there any endangered species in the project area that could be affected?	As discussed in Section 3.3, Biological Resources, of the EIR, a total of 28 special-status plant species and 18 special-status wildlife species have been recorded in the project vicinity and were assessed for potential to occur on the project site. Focused surveys were conducted to determine the presence of any listed species with moderate potential to occur, and all federally and state-listed species were determined to be absent from the project site. Two CDFW species of special concern, burrowing owl and San Diego black-tailed jackrabbit, were observed on the project site during surveys and are assumed present. One additional special-status species, California glossy snake, was not observed on the project site but has a moderate potential to occur. All species analyzed for potential to occur within the project site are listed in Tables 3.3-2 and 3.3-3 of the EIR. In addition, California horned lark, a CDFW Watch List species, was observed.
FAQ-BIO-2	Are there any plans to address the potential displacement of wildlife habitats caused by the Proposed Project?	As detailed in Section 3.3, Biological Resources, of the EIR, 664 acres of lands were placed into a conservation easement to offset species and habitat losses associated with the March Air Force Base Reuse Plan, which included redevelopment of the project site. As such, many habitat and species losses have already been addressed through conservation of these 664 acres of lands. These conservation lands contain non-native grassland habitats suitable for listed species that may be impacted by the Proposed Project. One native habitat present within the project site is Goodding's willow-red willow riparian woodland and forest. Goodding's willow-red willow riparian woodland and forest is a native community that is uncommon, but not rare, and has declined in the region due to development. This habitat exists in one small stand along the southern project site boundary and is bordered by developed land. MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting) requires compensatory mitigation for impacts to the small area of riparian vegetation that would be impacted by the Proposed Project.

Table II.5-4. Biological Resources FAQ Responses

Identifier	Question	Response
FAQ-BIO-3	Are there any plans to address the potential disruption of local ecosystems and wildlife habitats due to the Proposed Project?	Please refer to FAQ-BIO-2, above.
FAQ-BIO-4	Are there any plans to address the potential disruption of local ecosystems caused by the Proposed Project?	Please refer to FAQ-BIO-2, above.
FAQ-BIO-5	Are there any plans to address the potential loss of native plant and animal species habitats?	Please refer to FAQ-BIO-2, above.
FAQ-BIO-6	Are there any plans to mitigate the Proposed Project's impact on migratory bird populations?	Section 3.3, Biological Resources, of the EIR analyzed the Proposed Project's potential to impact migratory wildlife populations. The project site is located adjacent to developed and open space areas, but much of the vicinity is developed or experiences severe natural disturbance via use as an airstrip. Wildlife may move through the project site on a local level, but the project site and the area around it do not provide regional habitat connectivity between large open space areas. MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures) would require a pre-construction nesting bird survey, implementation of exclusion (avoidance) buffers, and biological monitoring to ensure that any nest is no longer active prior to the removal of the exclusion buffers, thus addressing direct and indirect impacts to nesting birds.
FAQ-BIO-7	Are there any plans to preserve or enhance natural habitats in the project area?	As detailed Section 3.3, Biological Resources, of the EIR, 664 acres of lands were placed into a conservation easement to offset species and habitat losses associated with the March Air Force Base Reuse Plan, which included redevelopment of the project site. As such, many habitat and species losses have already been addressed through conservation of these 664 acres of lands. These conservation lands contain non-native grassland habitats suitable for listed species that may be impacted by the Proposed Project. In addition to the existing conservation of 664 acres of natural habitats, MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting) and MM-BIO-1B (Burrowing Owl Relocation and Mitigation Plan) provide mitigation for impacts to riparian habitat and potential impacts to burrowing owls (in the event of burrowing owl presence) via preservation or enhancement of like habitats.
FAQ-BIO-8	Are there any specific measures in place to protect wildlife and prevent potential safety risks to aircraft in flight?	MM-BIO-2 (Best Management Practices) provides a list of BMPs to avoid impacts to special-status species and inadvertent disturbance to areas outside the Proposed Project construction limits. These include the presence of a biological monitor during construction activities, demarcation of construction limits, and flushing wildlife from suitable habitat areas prior to initial vegetation removal activities. Additionally, MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures) provides avoidance and minimization measures for impacts to

Table II.5-4. Biological Resources FAQ Responses

Identifier	Question	Response
		burrowing owls, MM-BIO-3 (San Diego Black-Tailed Jackrabbit Avoidance and Minimization Measures) provides avoidance and minimization measures for impacts to San Diego black-tailed jackrabbit, and MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures) provides avoidance and minimization measures for nesting birds. MM-HAZ-3 (Wildlife Protective Measures) requires incorporation of the recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) to reduce safety risks posed by wildlife to aircraft in flight.
FAQ-BIO-9	Has the Proposed Project considered the potential disruption to local ecosystems from increased aviation activities?	Section 3.3, Biological Resources, of the EIR analyzes potential impacts from the Proposed Project to sensitive biological resources based upon the criteria set forth in CEQA Guidelines Appendix G. As such, the impact analysis focuses on the plants, wildlife, and habitats that have been determined to be special-status or sensitive by the resources agencies or local policies, plans, and regulations. MM-HAZ-3 (Wildlife Protective Measures) requires incorporation of the recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR), which will avoid wildlife attractants on the project site, reducing the impacts to local ecosystems.
FAQ-BIO-10	Has the Proposed Project considered the potential disruption to local wildlife from increased noise pollution?	Section 3.3, Biological Resources, of the EIR analyzes potential impacts from the Proposed Project to sensitive biological resources based upon the criteria set forth in CEQA Guidelines Appendix G. As such, the impact analysis focuses on the wildlife that have been determined to be special-status by the resource agencies. In the analysis of impacts to burrowing owl, a special-status species, indirect impacts including such as excess noise, chemical pollution, and increased human presence were included and determined to be less than significant with mitigation incorporated. Additionally, comparing EIR Figure 3.11-3, Baseline Aircraft Operational Noise Levels, to Figure 3.11-12, Baseline + Project Peak Aircraft Operational Noise Levels, demonstrates that nearby parks and wildlife preserves, such as Sycamore Canyon, remain outside the 60 dBA noise contour line.
FAQ-BIO-11	Has the Proposed Project considered the potential impact on nocturnal animals from increased artificial lighting?	As discussed in Section 3.1, Aesthetics, of the EIR, the Proposed Project would use hoods or shields on all lighting fixtures and downward direction of all lighting sources. This would minimize the potential for off-site glare that could affect nocturnal animals. The Proposed Project's lighting would be of a similar nature and distribution as the lighting sources currently installed on warehouse and distribution facilities in the surrounding areas.
FAQ-BIO-12	Has the report considered the impact of the Proposed Project on nearby wetlands and waterways?	Section 3.3, Biological Resources, of the EIR analyzes impacts to wetlands in Threshold BIO-3 of the impacts analysis. As required by MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting), the Proposed Project shall mitigate at not less than 1:1 with reestablishment credits (0.45 acres USACE/0.45 acres RWQCB/0.49 acres CDFW) for impacts to aquatic resources as part of an overall strategy to ensure no net loss. The Proposed Project's impacts to wetlands would be less than significant with mitigation incorporated.
		As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, impacts related to water quality standards and groundwater would be

Table II.5-4. Biological Resources FAQ Responses

Identifier	Question	Response
		reduced to a less-than-significant level with implementation of MM-HYD-1 (Water Quality BMPs), which requires BMPs to protect water quality; MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires the project applicant to implement a Hazardous Materials Contingency Plan; MM-HAZ-2 (Stop Work, Groundwater Management), which requires the applicant to contact EPA Region IX and the state to determine appropriate procedures to either manage contaminated groundwater or alter construction plans to avoid further contact with contaminated groundwater; and MM-AQ-6 (Additional Air Quality Tenant Requirements), which requires the applicant to sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants. All other impacts related to hydrology and water quality would not occur or would be less than significant.
FAQ-BIO-13	How will the Proposed Project address potential impacts on wildlife, particularly birds, attracted to the project site?	MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures) provides measures to address impacts to birds during the construction phase of the Proposed Project. Additionally, MM-BIO-2 (Best Management Practices) requires the review of landscape plans by a Federal Aviation Administration-Qualified Airport Wildlife Biologist to avoid the creation of wildlife attractions (e.g., large trees that could attract raptors or other large avian species) that could pose risks to aircraft operations and to wildlife. MM-HAZ-3 (Wildlife Protective Measures) requires incorporation of the recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) to reduce safety risks posed by wildlife to aircraft in flight.
FAQ-BIO-14	How will the Proposed Project address potential safety risks associated with drainage features and vegetation attracting animals near the active runway?	MM-BIO-2 (Best Management Practices) requires the review of landscape plans by a Federal Aviation Administration-Qualified Airport Wildlife Biologist to avoid the creation of wildlife attractions (e.g., large trees that could attract raptors or other large avian species) that could pose risks to aircraft operations. MM-HAZ-3 (Wildlife Protective Measures) requires incorporation of the recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) to reduce safety risks posed by wildlife to aircraft in flight.
FAQ-BIO-15	How will the Proposed Project impact the local flora and fauna in the area?	Section 3.3, Biological Resources, of the EIR analyzes potential impacts from the Proposed Project to sensitive biological resources based upon the criteria set forth in CEQA Guidelines Appendix G. As such, the impact analysis focuses on the plant and wildlife species that have been determined to be special-status by the resource agencies. As detailed in Section 3.3 of the EIR, 664 acres of lands were placed into a conservation easement to offset species and habitat losses associated with the March Air Force Base Reuse Plan, which included redevelopment of the project site. As such, many habitat and species losses have already been addressed through conservation of these 664 acres of lands. MM-BIO-2 (Best Management Practices) requires biological monitoring; clearly marked work limits; restricting vehicle speed limits to 15 mph or slower to minimize the generation of fugitive dust; pet restrictions; measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and incorporation of native, non-invasive landscaping to minimize the spread of non-native

Table II.5-4. Biological Resources FAQ Responses

Identifier	Question	Response
		invasive plant and animal species. MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures) requires nesting bird surveys of the Proposed Project impact areas. If active nests are found, the biologist must establish buffers and/or implement monitoring to avoid impacting nesting success.
FAQ-BIO-16	How will the Proposed Project impact the local flora and fauna species, especially those that are endangered or protected?	Section 3.3, Biological Resources, of the EIR analyzes impacts to listed and special-status plant and wildlife species in Threshold BIO-1. No listed or special-status plant species were detected in the study area during field surveys, and no listed plant species have moderate to high potential to occur in the study area due to lack of suitable habitat. Three listed wildlife species (Riverside fairy shrimp, vernal pool fairy shrimp, and Stephens' kangaroo rat) have potential to occur within the project area but are presumed to be absent from the site based on negative field survey results. Two wildlife species of special concern, burrowing owl and San Diego black-tailed jackrabbit, were detected within the project site, and a third species of special concern, California glossy snake, has moderate potential to occur within the project site. Potential impacts to burrowing owl, San Diego black-tailed jackrabbit, California glossy snake, and nesting birds are discussed under Threshold BIO-1 of the EIR. With implementation of MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures), MM-BIO-2 (Best Management Practices), MM-BIO-3 (San Diego Black-Tailed Jackrabbit Avoidance and Minimization Measures), and MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures), impacts to burrowing owl, San Diego black-tailed jackrabbit, California glossy snake, and nest birds would be less than significant.
FAQ-BIO-17	How will the Proposed Project impact the local wildlife and ecosystems?	Section 3.3, Biological Resources, of the EIR analyzes potential impacts from the Proposed Project to sensitive biological resources based upon the criteria set forth in CEQA Guidelines Appendix G. As such, the impact analysis focuses on the plants, wildlife, and habitats that have been determined to be special-status or sensitive by the resources agencies or local policies, plans, and regulations. As detailed in Section 3.3 of the EIR, 664 acres of lands were placed into a conservation easement to offset species and habitat losses associated with the March Air Force Base Reuse Plan, which included redevelopment of the project site. As such, many habitat and species losses have already been addressed through conservation of these 664 acres of lands. MM-BIO-2 (Best Management Practices) requires biological monitoring; clearly marked work limits; restricting vehicle speed limits to 15 mph or slower to minimize the generation of fugitive dust; pet restrictions; measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and incorporation of native, non-invasive landscaping to minimize the spread of non-native invasive plant and animal species. MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures) requires nesting bird surveys of the Proposed Project impact areas. If active nests are found, the biologist must establish buffers and/or implement monitoring to avoid impacting nesting success.

Table II.5-4. Biological Resources FAQ Responses

Identifier	Question	Response
FAQ-BIO-18	How will the Proposed Project impact the overall biodiversity and ecological balance of the area?	Please refer to FAQ-BIO-17, above.
FAQ-BIO-19	How will the Proposed Project impact local wildlife habitats and biodiversity?	Please refer to FAQ-BIO-17, above.
FAQ-BIO-20	What measures are in place to prevent the spread of invasive species and pests due to the Proposed Project?	MM-BIO-2 (Best Management Practices) requires biological monitoring; clearly marked work limits; restricting vehicle speed limits to 15 mph or slower to minimize the generation of fugitive dust; pet restrictions; measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and incorporation of native, non-invasive landscaping to minimize the spread of non-native invasive plant and animal species.
FAQ-BIO-21	What measures are in place to protect the local flora and fauna species, especially those that are rare or endangered?	Please refer to FAQ-BIO-16, above.
FAQ-BIO-22	What steps will be taken to incorporate recommendations from the Wildlife Hazard Review into the project design?	MM-BIO-2 (Best Management Practices) requires the review of landscape plans by a Federal Aviation Administration-Qualified Airport Wildlife Biologist to avoid the creation of wildlife attractions (e.g., large trees that could attract raptors or other large avian species) that could pose risks to aircraft operations and to wildlife. MM-HAZ-3 (Wildlife Protective Measures) requires incorporation of the recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) to reduce safety risks posed by wildlife to aircraft in flight.
FAQ-BIO-23	What steps will be taken to minimize the environmental impact of hazardous materials on surrounding ecosystems and wildlife?	MM-BIO-2 (Best Management Practices) requires biological monitoring; clearly marked work limits; restricting vehicle speed limits to 15 mph or slower to minimize the generation of fugitive dust; pet restrictions; measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and incorporation of native, non-invasive landscaping to minimize the spread of non-native invasive plant and animal species. MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting) provides additional BMPs to avoid the impact of hazardous substances on local waterways. MM-HYD-1 (Water Quality BMPs) requires BMPs to protect water quality; MM-HAZ-1 (Hazardous Materials Contingency Plan) requires the project applicant to implement a Hazardous Materials Contingency Plan; MM-HAZ-2 (Stop Work, Groundwater Management) requires the applicant to contact EPA Region IX and the state to determine appropriate procedures to either manage contaminated groundwater or alter construction plans to avoid further contact with contaminated groundwater; and MM-AQ-6 (Additional Air Quality Tenant Requirements) requires the applicant to sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants. With

Table II.5-4. Biological Resources FAQ Responses

Identifier	Question	Response
		implementation of these mitigation measures, impacts of hazardous materials on surrounding ecosystems and wildlife would be less than significant.
FAQ-BIO-24	Has the report considered the impact of the Proposed Project on local water quality and aquatic ecosystems?	Please refer to FAQ-BIO-12, above.
FAQ-BIO-25	Has the report considered the impact of the Proposed Project on nearby water bodies and aquatic ecosystems?	Please refer to FAQ-BIO-12, above.
FAQ-BIO-26	How will the Proposed Project impact the overall environmental sustainability and long-term ecological health of the region?	Section 3.3, Biological Resources, of the EIR analyzes potential impacts from the Proposed Project to sensitive biological resources based upon the criteria set forth in CEQA Guidelines Appendix G. As such, the impact analysis focuses on the plants, wildlife, and habitats that have been determined to be special-status or sensitive by the resources agencies, as well as analyzing impacts on wetlands, conflicts with local biological resource protection policies, and impacts on migratory wildlife populations. With the proposed mitigation measures for the Proposed Project and the 664 acres of lands that were placed into a conservation easement to offset species and habitat losses associated with the March Air Force Base Reuse Plan, the Proposed Project's impacts to the long-term ecological health of the region would be less than significant.

Table II.5-5. Cultural Resources FAQ Responses

Identifier	Question	Response
FAQ-CUL-1	Has the report considered the impact of the Proposed Project on local cultural heritage sites and historical landmarks?	As discussed in Section 3.4, Cultural Resources, of the EIR, a CHRIS search and NAHC Sacred Lands File search were conducted for the APE and a 1-mile radius for mapped prehistoric, historical, and built-environment resources and properties designated as California Historical Landmarks, Points of Historical Interest, or Riverside County Landmarks. The Proposed Project's impact on historical resources was evaluated under Threshold CUL-1, and it was determined to have no impact. As discussed in Section 3.13, Tribal Cultural Resources, of the EIR, MIPAA has not identified any geographically defined TCRs as intersecting the project site but TCRs have been defined in the broader region. In consideration of the broader landscape, MM-TCR-1 (Tribal Monitoring) is included in the Final EIR as part of the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities. MM-CUL-1 (Archaeological Monitoring) provides for archaeological monitoring of all initial ground-disturbing activities. MM-TCR-3 (Discovery of Human Remains) in the Final EIR provides protocol for dealing with inadvertent discovery of human remains, and

Table II.5-5. Cultural Resources FAQ Responses

Identifier	Question	Response
		MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training. Impacts would be less than significant with mitigation incorporated.
FAQ-CUL-2	Has the report considered the impact of the Proposed Project on the cultural heritage and historical sites in the vicinity?	Please refer to FAQ-CUL-1, above.
FAQ-CUL-3	What measures are in place to address potential cultural heritage sites in the Proposed Project area?	Please refer to FAQ-CUL-1, above.
FAQ-CUL-4	What measures are in place to ensure the preservation of cultural heritage sites and historical landmarks in the vicinity?	Please refer to FAQ-CUL-1, above.

Table II.5-6. Energy FAQ Responses

Identifier	Question	Response
FAQ-ENG-1	Are there any plans for sustainable energy use in the Proposed Project?	Under MM-AQ-2 (Construction Requirements), electric-powered hand tools, forklifts, and pressure washers are required to be used to the extent feasible, with a designated area on the project site where electric-powered construction vehicles and equipment can charge. The Proposed Project would comply with the most current Title 24 Building Standards at the time building permits are issued. California Code of Regulations Title 24, Part 6, Energy Efficiency Standards, which govern energy efficiency in building construction, have progressively tightened with each update, making buildings increasingly energy-efficient over time. For example, the 2022 standards emphasized electrification and reducing greenhouse gas emissions. Residential buildings are expected to be about 10% more energy-efficient compared to the 2019 standards, with non-residential buildings seeing similar improvements. Moreover, MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the building to achieve 2023 LEED Silver certification standards or equivalent, at a minimum and includes specific commitments that will serve to reduce energy use and make the Proposed Project more sustainable. MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with 2022 CALGreen Tier 2. Solar panels were determined to not be feasible because they would interfere with aircraft navigation.

Table II.5-6. Energy FAQ Responses

Identifier	Question	Response
FAQ-ENG-2	Are there any plans to offset the Proposed Project's carbon emissions through environmental initiatives?	The Proposed Project includes MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements) which, in addition to reducing criteria air pollutants, have the cobenefit of reducing GHG emissions. In addition, MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project plans to include circuitry, capacity, and equipment for electric vehicle charging in accordance with Tier 2 of the 2022 CALGreen Code, which serves to reduce the Proposed Project's GHG emissions.
FAQ-ENG-3	Can the report provide more details on how the Proposed Project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	In Section 3.10, Land Use and Planning, of the EIR, Table 3.10-1 evaluated the Proposed Project's consistency with March JPA General Plan policies relative to reducing emissions associated with vehicle/engine use and encouraging energy-efficient equipment and design in the Planning Area and determined the Proposed Project would be generally consistent with mitigation incorporated. MM-AQ-1 (Construction Management Plan) requires all heavy-duty trucks hauling onto the project site to be model year 2014 or later, which would improve fuel efficiency. MM-AQ-2 (Construction Requirements) requires the use of electric-powered hand tools, forklifts, and pressure washers, to the extent feasible, along with a designated charging area, and limits construction equipment idling to no more than 3 minutes. MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the annual provision of information to employees and truck drivers about electric vehicle charging availability, alternate transportation opportunities for commuting, the Voluntary Interindustry Commerce Solutions "Empty Miles" program to improve goods trucking efficiencies, and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. MM-AQ-4 (Truck Requirements) limits truck idling to 3 minutes. MM-AQ-5 (Commute Trip Reduction) requires any tenant agreement to include 5% reserved parking spaces for carpools and vanpools, provision of short- and long-term bicycling parking facilities and "end-of-trip" facilities, on-site food vending or kitchen equipment and mail facilities, and establishment of a rideshare program with financial incentives. MM-GHG-1 (Installation of EV Charging Stations) requires that the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with the 2022 CALGreen Tier 2.
FAQ-ENG-4	Can the report provide more details on the consistency evaluation of the Proposed Project with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard?	As discussed in Section 3.7, Greenhouse Gas Emissions, in Table 3.7-6, California Senate Bill X1-2 RPS is a regulatory program that applies to investor-owned utilities, electric service providers, and community choice aggregators, and not directly to land use development. However, the Proposed Project would benefit from and be consistent with this regulatory program because electricity would be purchased from SCE, which is required to procure 45% and 50% of retail sales from renewable energy resources by 2027 and 2030, respectively. As detailed in Section 3.5, Energy of the EIR, the Proposed Project would be required to comply with applicable Title 24 Standards, including CALGreen, in place at the time plan check submittals are made. MM-GHG-1 (Installation of EV Charging Stations) requires that the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with the 2022 CALGreen Tier 2.

Table II.5-6. Energy FAQ Responses

Identifier	Question	Response
FAQ-ENG-5	How does the Proposed Project ensure consistency with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard to meet the required standards and guidelines for sustainable development and energy efficiency?	Please refer to FAQ-ENG-4, above.
FAQ-ENG-6	How will the Proposed Project ensure long- term sustainability and environmental stewardship?	MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the building to achieve 2023 LEED Silver certification standards or equivalent, at a minimum and includes specific commitments that will serve to reduce energy use and make the Proposed Project more sustainable. MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with 2022 CALGreen Tier 2. Accordingly, the Proposed Project would incorporate sustainable design and construction which would lead to long-term energy efficiency and water conservation. Sustainable projects lead to long-term cost saving through reduced energy and water consumption, lower waste management costs, and increased property value. It is in the Proposed Project's interest to ensure long-term sustainability and environmental stewardship. As environmental regulations become more stringent and resource scarcity increases, sustainable projects are better positioned to adapt to future challenges and remain viable over the long term.
FAQ-ENG-7	How will the Proposed Project impact the overall carbon footprint of the region?	Section 3.7, Greenhouse Gas Emissions, disclosed the most recent GHG emissions inventory for the State of California and the County of Riverside at the time of the Draft EIR preparation. Riverside County had a GHG inventory of 4,905,518 MTCO ₂ e in 2017. The Proposed Project's annual GHG emissions with mitigation measures incorporated would be 22,923.04 MTCO ₂ e, which is approximately 0.47% of the total Riverside County inventory.
FAQ-ENG-8	What measures are in place to ensure the Proposed Project's alignment with sustainable development goals and environmental best practices?	MM-AQ-1 (Construction Management Plan) requires all heavy-duty trucks hauling onto the project site to be model year 2014 or later, which would improve fuel efficiency. MM-AQ-2 (Construction Requirements) requires the use of electric-powered hand tools, forklifts, and pressure washers, to the extent feasible, along with a designated charging area, and limits construction equipment idling to no more than 3 minutes. MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the annual provision of information to employees and truck drivers about electric vehicle charging availability, alternate transportation opportunities for commuting, the Voluntary Interindustry Commerce Solutions "Empty Miles" program to

Table II.5-6. Energy FAQ Responses

I de matérie m	0	Description
Identifier	Question	Response
		improve goods trucking efficiencies, and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. MM-AQ-4 (Truck Requirements) limits truck idling to 3 minutes. MM-AQ-5 (Commute Trip Reduction) requires any tenant agreement to include 5% reserved parking spaces for carpools and vanpools, provision of short- and long-term bicycling parking facilities and "end-of-trip" facilities, on-site food vending or kitchen equipment and mail facilities, and establishment of a rideshare program with financial incentives. MM-GHG-1 (Installation of EV Charging Stations) requires that the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with the 2022 CALGreen Tier 2.
FAQ-ENG-9	What measures are in place to ensure the Proposed Project's long-term sustainability and environmental stewardship?	Please refer to FAQ-ENG-8, above.
FAQ-ENG- 10	What measures are in place to promote sustainable aviation practices?	Sustainable aviation practices for air cargo facilities focus on reducing environmental impact, improving efficiency, and promoting long-term sustainability in the operations of these facilities. As discussed in Section 4.2, Air Quality, research is ongoing for controlling aircraft emissions and improving fuel efficiencies. "The aviation industry has achieved significant advances to improve the fuel efficiency of modern aircraft in this era of sustainable engineering and fluctuating petroleum prices. Adopting cutting-edge technologies and implementing novel engineering innovations has enabled aircraft manufacturers and managers to decrease fuel consumption, reduce carbon dioxide emissions, and mitigate their negative ecological footprint." As an air cargo facility, it would be in the economic interest of the future tenant to implement efficient logistics and routing practices to minimize fuel costs, which would reduce fuel consumption and emissions during cargo transport.
FAQ-ENG- 11	What measures are in place to promote sustainable land use practices and soil conservation?	The Proposed Project does not propose any alterations to significant land forms, important watershed areas or mineral resources. The Proposed Project would be required to comply with the NDPES Construction General Permit, including implementation of a SWPPP, to avoid impacts of stormwater discharges during construction. A WQMP would be implemented during operational activities to ensure stormwater runoff from the project site is managed to protect water sources downstream, utilizing LID stormwater design features and BMPs.
FAQ-ENG- 12	How will the Proposed Project impact the overall environmental sustainability and long-term ecological health of the region?	The EIR analyzed and disclosed the Proposed Project's impact for specific resource topics pursuant to the March JPA CEQA Guidelines and the CEQA Guidelines Appendix G checklist. Section 3.2, Air Quality, of the EIR disclosed the Proposed Project's significant and unavoidable impact relative to conflicts with the SCAQMD air quality management plan for attaining federal air quality standards and

 $^{^{35} \}quad \text{https://www.azom.com/article.aspx?ArticleID=22802}.$

Table II.5-6. Energy FAQ Responses

Identifier	Question	Response
		exceedances to the SCAQMD thresholds of significance for VOCs, NOx, and CO. Section 3.5, Energy, disclosed the Proposed Project's energy use but determined that it would not be wasteful or inefficient and thus would have a less than significant impact relative to energy use.
		Section 3.7, Greenhouse Gas Emissions, found that the Proposed Project would not conflict with plans adopted to reduce greenhouse gas emissions, as such it would have a less than significant impact relative to greenhouse gas emissions.

Table II.5-7. Environmental Justice FAQ Responses

Identifier	Question	Response
FAQ-EJ-1	Are there any plans to address potential environmental justice concerns in the project area?	As discussed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Where 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.
		The Proposed Project is sited in a location that would not result in a localized impact to sensitive receptors located in housing, schools, childcare facilities, and hospitals. The nearest sensitive receptor is approximately 0.5 miles east of the project site. As demonstrated in Section 3.2, Air Quality, of the EIR, based on construction and operational LST (NO ₂ , CO, PM ₁₀ , and PM _{2.5}) analyses and the CO hot spot assessment, the Proposed Project is not anticipated to result in localized criteria pollutant impacts.
		The Proposed Project HRA (Appendix C-1) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6 (Additional Air Quality Tenant Requirements) are designed to improve air quality in the region by increasing energy efficiency, reducing water usage, imposing truck requirements, reducing commute trips, and imposing additional tenant requirements, which reduces the strain on resources for all.
		As discussed in Section 3.2, Air Quality, and Section 3.7, Greenhouse Gas Emissions, of the EIR, the Proposed Project includes MM-AQ-1 through MM-AQ-6, which, in addition to reducing criteria air pollutants, have the co-benefit of reducing GHG emissions. In addition, MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project plans to include circuitry, capacity, and equipment for electric vehicle charging in accordance with Tier 2 of the 2022 CALGreen Code, which will serve to reduce the Proposed Project's GHG emissions. As identified in Section

Table II.5-7. Environmental Justice FAQ Responses

Identifier	Question	Response
		3.8, Hazards and Hazardous Materials, of the EIR, the Proposed Project would have less than significant impacts related to hazards and hazardous materials with the incorporation of MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires the approval of a Hazardous Materials Contingency Plan prior to the issuance of a grading permit; MM-HAZ-2 (Stop Work, Groundwater Management), which requires stop work orders and groundwater management relating to the existing soil vapor extraction system, and MM-HAZ-3 (Wildlife Protective Measures), which requires that the Proposed Project incorporate recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) for the Proposed Project.
		The Proposed Project–specific WQMP (Appendix K-2 of the EIR) describes and illustrates how the Proposed Project would comply with the Riverside County MS4 Permit requirements. Source control and operational BMPs have been incorporated into the project design, including site design BMPs, source control BMPs, treatment control BMPs, and operation and maintenance requirements. In addition, MM-HYD-1 (Water Quality BMPs) will be implemented to reduce impacts on water quality. MM-AQ-6 requires that the tenant sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants.
		The primary mitigation measures suitable for addressing airborne aircraft noise can include modifying the flight path, restricting hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement of the affected residences in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that, absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
		MM-TRA-1 (Construction Traffic Management Plan) requires the development of a plan to ensure construction traffic would have less-than-significant impacts to transportation facilities. The Proposed Project

Table II.5-7. Environmental Justice FAQ Responses

Identifier	Question	Response
		would construct a traffic signal at the intersection of Heacock Street and the existing access roadway and, as required by MM-TRA-2 (Project Truck Route on Heacock Street), Proposed Project truck traffic would utilize the truck routes south of the project site. These measures would ensure the Proposed Project does not disproportionately impact environmental justice communities.
		The EIR includes numerous mitigation measures that will lessen impacts and protect the public, including MM-AQ-1 through MM-AQ-6, MM-GHG-1, MM-HAZ-1 through MM-HAZ-3, MM-HYD-1, MM-NOI-1, MM-NOI-2, MM-TRA-1, and MM-TRA-2.
FAQ-EJ-2	Are there any plans to address the potential social inequalities or disparities that may arise from the Proposed Project?	Please refer to FAQ-EJ-1, above.
FAQ-EJ-3	Are there any plans to promote healthy living initiatives for residents in the area?	As discussed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. The Proposed Project would generate approximately 150 jobs, which it is assumed would be filled by the existing residential population from the greater Riverside County area. MM-AQ-5 (Commute Trip Reduction) requires the provision of short- and long-term bicycle parking facilities to meet peak season maximum demand, along with "end-of-trip" facilities such as showers, lockers, and changing spaces.
FAQ-EJ-4	How will the Proposed Project impact the overall health and well-being of residents living in the vicinity?	Please refer to FAQ-EJ-1, above.
FAQ-EJ-5	How will the Proposed Project impact the overall health and well-being of the local community?	Please refer to FAQ-EJ-1, above.
FAQ-EJ-6	How will the Proposed Project impact the overall livability and quality of life for residents in the community?	Please refer to FAQ-EJ-1, above.
FAQ-EJ-7	Are there any plans to address potential gentrification issues in the project area?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not displace existing residents or businesses because the project site is primarily vacant and undeveloped and does not contain existing housing or businesses. The project site is surrounded by industrial warehouse uses to the south and east and is partially on and partially adjacent to March ARB to the north and west,

Table II.5-7. Environmental Justice FAQ Responses

Identifier	Question	Response
		which includes military uses and an active airfield. Immediately north of the project site is the March ARB Fire Department. As such, no impact would occur.
FAQ-EJ-8	Are there any plans to address the potential gentrification of the area due to the Proposed Project?	Please refer to FAQ-EJ-7, above.
FAQ-EJ-9	How will the Proposed Project impact the overall social cohesion and community well-being in the area?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not result in the physical division of an established community. The project site is located west of Heacock Street, adjacent to March ARB, and southwest of the intersection of Heacock Street and Krameria Avenue, in unincorporated Riverside County, California (Figure 1-1 in the EIR). The March ARB Fire Department facility is located immediately north of the project site, and industrial warehouse facilities occupied by Hanes/DDI and an air cargo center occupied by KRIV-Amazon are located immediately south of the site. Along the Heacock Street corridor abutting the site to the east are a variety of industrial and business park warehouse uses within the City of Moreno Valley. The nearest residential area is located approximately 0.5 miles to the east. Interstate 215 is located approximately 1 mile west of the project site.
FAQ-EJ-10	How will the Proposed Project impact the quality of life for nearby residents?	Please refer to FAQ-EJ-1, above.

Table II.5-8. Geology and Soils FAQ Responses

Identifier	Question	Response
FAQ-GEO-1	Are there any plans to prevent soil erosion and degradation from construction activities?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, short-term erosion effects during construction of the Proposed Project would be minimized through implementation of a SWPPP as required in compliance with the NPDES program, as well as through incorporation of BMPs intended to reduce soil erosion. The SWPPP is required by MIPAA during plan review and approval of improvement plans. The SWPPP would include standard construction methods, such as temporary detention basins, to control on-site and off-site erosion. With implementation of an approved SWPPP, impacts resulting from soil erosion or loss of topsoil would be minimized and impacts would be less than significant.
FAQ-GEO-2	Has the report thoroughly assessed the risk of landslides in the area due to the Proposed Project?	As discussed in Chapter 4, Other CEQA Considerations, and Section 3.6, Geology and Soils, Threshold GEO-2, of the EIR, based on the relatively flat to gently sloping topography of the project site, and as indicated by the County of Riverside General Plan Safety Element (Figure 3, Landslide Risk), the project site is not located on, adjacent to, or near an earthquake-induced slope instability or landslide area. As such, the

Table II.5-8. Geology and Soils FAQ Responses

Identifier	Question	Response
		potential for on-site landslides is considered to be low to non-existent. Temporary and permanent slopes would be constructed in accordance with the recommendations of the Proposed Project-specific Geotechnical Exploration, as required by the applicable CBC, as well as in compliance with provisions of CBC Sections 1804 and 1804A regarding excavation, grading, and fill, thus eliminating the potential for slope failure to occur. Impacts related to landslides would be less than significant.
FAQ-GEO-3	Has the report thoroughly assessed the risk of soil compaction and loss of soil fertility from construction activities?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project is on a previously developed site that has not been used for agricultural uses and would not be in the future. As a result, soil compaction and loss of soil fertility are not relevant to the evaluation of the Proposed Project's impacts.
FAQ-GEO-4	Has the report thoroughly assessed the risk of soil contamination from construction activities?	Section 3.8, Hazards and Hazardous Materials, of the EIR discussed the existing soil contamination issues and the Proposed Project's potential impacts. Potential impacts would be mitigated by MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires an HMCP that outlines procedures for identification, characterization, handling, transportation, and disposal of contaminated and potentially contaminated soils.
FAQ-GEO-5	Has the report thoroughly assessed the risk of soil erosion and sediment runoff from the project site?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, short-term erosion effects during construction of the Proposed Project would be minimized through implementation of a SWPPP as required in compliance with the NPDES program, as well as through incorporation of BMPs intended to reduce soil erosion. The SWPPP is required by MIPAA during plan review and approval of improvement plans. The SWPPP would include standard construction methods, such as temporary detention basins, to control on-site and off-site erosion. With implementation of an approved SWPPP, impacts resulting from soil erosion or loss of topsoil would be minimized and impacts would be less than significant.
		As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, the SWPPP would incorporate BMPs to control construction-related erosion and sedimentation in dry weather and stormwater runoff. Compliance with the Construction General Permit would ensure that water quality impacts due to discharge of stormwater runoff to the stormwater system during construction would be less than significant. Compliance with applicable permit conditions and required implementation of water quality BMPs during operation and maintenance of the Proposed Project would eliminate or substantially minimize potential adverse impacts on water quality. The Proposed Project-specific WQMP (Draft EIR Appendix K-2) details how the Proposed Project would comply with the Riverside County MS4 Permit requirements. In addition, MM-HYD-1 (Water Quality BMPs) would reduce impacts on water quality. MM-AQ-6 (Additional Air Quality Tenant Requirements) requires that the tenant sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants. Project operations-related impacts to water quality would be less than significant with mitigation incorporated.

Table II.5-8. Geology and Soils FAQ Responses

Identifier	Question	Response
FAQ-GEO-6	Has the report thoroughly assessed the risk of soil erosion and sedimentation from construction activities related to the Proposed Project?	Please refer to FAQ-GEO-1, above.
FAQ-GEO-7	How will the Proposed Project impact the overall soil quality in the region?	See Section 3.8, Hazards and Hazardous Materials, of the EIR for issues related to soil contamination. The Proposed Project would have no impacts related to off-site regional soil quality.
FAQ-GEO-8	What measures are in place to prevent soil erosion during and after construction?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, short-term erosion effects during construction of the Proposed Project would be minimized through implementation of a SWPP as required in compliance with the NPDES program, as well as through incorporation of BMPs intended to reduce soil erosion. The SWPPP is required by MIPAA during plan review and approval of improvement plans. The SWPPP would include standard construction methods, such as temporary detention basins, to control on-site and off-site erosion. With implementation of an approved SWPPP, impacts resulting from soil erosion or loss of topsoil would be minimized and impacts would be less than significant. Following construction, the project site would be paved, thus preventing long-term soil erosion.
FAQ-GEO-9	How will the Proposed Project address the contamination of chlorinated VOCs, particularly trichloroethylene (TCE), in the soil, soil gas, and groundwater?	Section 3.8, Hazards and Hazardous Materials, of the EIR analyzed issues related to soil, soil gas, and groundwater contamination. Restrictive covenants in place at the site limit activities to avoid contact with contaminated media. Additionally, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires a hazardous material contingency plan be in place, which requires worker protections, further guidelines for management of contaminated soil, and monitoring for contaminated soil vapor.

Table II.5-9. Greenhouse Gas Emissions FAQ Responses

Identifier	Question	Response
FAQ-GHG-1	Are there any plans to address the potential increase in greenhouse gas emissions and carbon footprint from the Proposed Project?	As discussed in Section 3.7, Greenhouse Gas Emissions, in the EIR, the Proposed Project includes MM-AQ-3 (Improved Energy Efficiency and Water Reduction) through MM-AQ-6 (Additional Air Quality Tenant Requirements), which have the co-benefit of reducing GHG emissions in addition to criteria air pollutants. In addition, MM-GHG-1 (Installation of EV Charging Stations) will reduce GHG emissions by encouraging the use of EVs through the provision of charging facilities on the project site.

Table II.5-9. Greenhouse Gas Emissions FAQ Responses

Identifier	Question	Response
FAQ-GHG-2	Are there any plans to address the potential increase in greenhouse gas emissions resulting from the Proposed Project?	Please refer to FAQ-GHG-1, above.
FAQ-GHG-3	Are there any plans to offset the Proposed Project's carbon emissions through environmental initiatives?	The Proposed Project includes MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements) which, in addition to reducing criteria air pollutants, have the co-benefit of reducing GHG emissions. In addition, MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project plans to include circuitry, capacity, and equipment for EV charging in accordance with Tier 2 of the 2022 CALGreen Code, which will serve to reduce the Proposed Project's GHG emissions.
FAQ-GHG-4	Can the report provide more information on the quantification of refrigerant emissions from air-conditioning equipment during regular operation and routine servicing over the equipment lifetime, as mentioned in the report?	As discussed in the GHG Analysis Report (Appendix G of the EIR), CalEEMod was used to estimate emissions associated with refrigerants. Air conditioning and refrigeration equipment associated with the buildings are anticipated to generate GHG emissions. CalEEMod automatically generates a default air conditioning and refrigeration equipment inventory for each project land use subtype based on industry data from the EPA. CalEEMod quantifies refrigerant emissions from leaks during regular operation and routine servicing over the equipment lifetime and then derives average annual emissions from the lifetime estimate.
FAQ-GHG-5	How does the Proposed Project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and emissions criteria?	California's Waste Heat and Carbon Emissions Reduction Act, as outlined in Assembly Bill 1613, is not specifically targeted at individual development projects. Instead, the act is focused on promoting the adoption of combined heat and power (CHP) systems across a broad range of applications, particularly in industrial, commercial, and institutional settings where these systems can be effectively utilized. While California's Waste Heat and Carbon Emissions Reduction Act is not directly targeted at individual development projects, it provides a framework that supports the adoption of CHP systems across various sectors. Development projects, particularly those with significant energy demands, can choose to implement CHP systems to align with the state's energy efficiency and emissions reduction goals. As discussed in Section 3.5, Energy, of the EIR, the Proposed Project would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. The Proposed Project includes MM-AQ-3 (Improved Energy Efficiency and Water Reduction), which requires improved energy efficiency in terms of building design, which would serve to reduce energy demand.

Table II.5-9. Greenhouse Gas Emissions FAQ Responses

Identifier	Question	Response
FAQ-GHG-6	Has the Proposed Project considered the community's potential vulnerability to climate change impacts?	Section 3.7, Greenhouse Gas Emissions, of the EIR specifically discusses potential climate change impacts for the region related to public health, water resources, agriculture, forests and landscapes, and rising sea levels.
FAQ-GHG-7	Has the Proposed Project considered the long-term effects on climate change?	Please refer to FAQ-GHG-6, above.
FAQ-GHG-8	Has the Proposed Project considered the potential increase in greenhouse gas emissions from airport operations?	Section 3.7, Greenhouse Gas Emissions, of the EIR includes a summary of all Project operational GHG emissions, including aircraft operations. See Table 3.7-11.
FAQ-GHG-9	Has the report considered the long-term effects of the Proposed Project on the local climate and microclimate?	The EIR does not specifically address potential changes to the local climate or microclimate, but it provided an overall description of potential climate change impacts for the region. In general, changes to a local climate and microclimate may be caused by alterations in land use, vegetation, building materials, and energy consumption. The urban heat island effect can be caused by large-scale development projects where natural landscapes are replaced with concrete, asphalt, and buildings. The Proposed Project would not remove natural vegetation.
		Tall buildings may alter wind patterns; however, the Proposed Project would be height-limited to comply with airport land use zoning. The removal of large, vegetated areas may result in changes in humidity and precipitation; however, the Proposed Project would not replace large, vegetated areas. The Proposed Project would not alter existing habitat or local water bodies. The potential criteria air pollutant concentrations were discussed in Section 3.2, Air Quality, of the EIR. It was found that localized impacts would be less than significant.
FAQ-GHG-10	How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft- related operational emissions, including the refueling of aircraft and the	As noted in Appendix B-1, Air Quality Report, of the EIR, aircraft related operational emissions were based on Project-specific data and modeled using the FAA's Aviation Environmental Design Tool (AEDT). Refueling of aircrafts that would use the proposed facilities would occur on site. Aircraft fuel would be trucked from the existing MIPAA aircraft fuel farm located off site; emissions associated with the trucked fuel were included in the AEDT. As noted in the EIR, most of the criteria air pollutant and GHG
	associated GHG emissions, as modeled using AEDT Version 3C in the report?	emissions would be from aircraft, but there are no current technologies in place to control emissions. Research is ongoing on controlling emissions and improving fuel efficiencies.

Table II.5-9. Greenhouse Gas Emissions FAQ Responses

Identifier	Question	Response
FAQ-GHG-11	How will the Proposed Project ensure long-term sustainability and environmental stewardship?	MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the building to achieve 2023 LEED Silver certification standards or equivalent at a minimum and includes specific commitments that will serve to reduce energy use and make the Proposed Project more sustainable. MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with 2022 CALGreen Tier 2. Accordingly, the Proposed Project would incorporate sustainable design and construction, which would lead to long-term energy efficiency and water conservation. Sustainable projects lead to long-term cost saving through reduced energy and water consumption, lower wase management costs, and increased property value. It is in the Proposed Project's interest to ensure long-term sustainability and environmental stewardship. As environmental regulations become more stringent and resource scarcity increases, sustainable projects are better positioned to adapt to future challenges and remain viable over the long term.
FAQ-GHG-12	How will the Proposed Project impact the overall carbon footprint of the region?	Section 3.7, Greenhouse Gas Emissions, of the EIR disclosed the most recent GHG emissions inventory for the State of California and the County of Riverside at the time of the Draft EIR preparation. The inventory included in the County's CAP did not include emissions from March JPA. As reported in the County's CAP, Riverside County had a GHG inventory of 4,905,518 MT CO ₂ e in 2017. The Proposed Project's annual GHG emissions with mitigation measures incorporated would be 22,923.04 MT CO ₂ e, which would result in an increase of approximately 0.47% in the Riverside County inventory.
FAQ-GHG-13	What measures are in place to address potential climate change effects from airport operations?	The impacts of climate change were discussed in Section 3.7, Greenhous Gas Emissions, of the EIR. California has implemented a comprehensive set of programs and policies aimed at addressing the impacts of climate change. These initiatives cover a broad range of sectors, including energy, transportation, agriculture, and land use, with a strong focus on reducing GHG emissions, promoting renewable energy, and enhancing climate resilience. Many of the policies were discussed in Section 3.7 and include the following:
		California Global Warming Solutions Act (AB 32)
		Senate Bill 32 (SB 32) Renewable Portfolio Standard
		California Advanced Clean Cars Program
		California Building Standards (Title 24)
		Sustainable Communities and Climate Protection Act (SB 375)
		The Proposed Project would participate in these programs as regulatory measures are implemented to reduce GHG emissions and adapt to changing climates.
FAQ-GHG-14	What specific goals and policies from the Local March Joint Powers Authority General Plan are	Section 3.10, Land Use and Planning, and Table 3.10-1 of the EIR demonstrate how the Proposed Project is consistent with the applicable goals and policies of the March JPA General Plan related to GHG emissions, noise, and air quality. These include, but are not limited to, Noise/Air Quality Element Goal 1 (Ensure that land uses are protected

Table II.5-9. Greenhouse Gas Emissions FAQ Responses

Identifier	Question	Response
	being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	from excessive and unwanted noise), 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), and Goal 4 (Pursue reduced emissions for stationary and mobile sources through the use and implementation of new and advancing technologies), as well as Environmental Justice Element Policy 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 GHG emissions to avoid or minimize creating adverse conditions for adjacent communities). As discussed in Table 3.10-1, the Proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Where appropriate, mitigation measures are included to reduce and/or avoid potential conflicts with applicable goals adopted for the purpose of avoiding or mitigating GHG, noise, and air quality impacts, including MM-NOI-1 (Construction Worker Hearing Protection) and MM-NOI-2 (Future Tenant Aircraft Fleet), MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements), and MM-GHG-1 (Installation of EV Charging Stations).

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-1	Are there any contingency plans in case of accidental release of hazardous materials during construction?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires preparation and approval of a HMCP that includes procedures for evaluation of contaminated soils and soil vapor, as well as procedures to handle any hazardous materials identified in these environmental media. Additionally, MM-HAZ-2 (Stop Work, Groundwater Management) requires work to stop if groundwater is encountered, and regulatory authorities would be contacted. Further, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-2	Are there any plans for ongoing collaboration with regulatory agencies and local authorities on hazardous materials management?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, activity and use limitations are in place at the project site, specifically for Parcel D-1 due to the location within Site 7. A portion of Site 7 is already occupied by existing development to the south of the project site and would not be disturbed. The Proposed Project would leave the portion of Site 7 that includes the burn areas undisturbed. As part of construction of the Proposed Project, expansion of the existing access roadway to the south of the project site would slightly overlap with Site 7; however, it would avoid the burn areas within Site 7. There are Environmental Restrictive Covenants that apply to Site 7 and include notification of EPA and DTSC for specific activities at the project site. The Restrictive Covenants are enforceable by the State of California, U.S. Department of Air Force, and EPA. Additionally, the HCMP required by MM-HAZ-1 (Hazardous Materials Contingency Plan) would be submitted to EPA and DTSC for review/approval prior to the start of construction for review of the protective measures during work within Site 7. Further, in response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project now includes a parcel map to subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11, Tentative Parcel Map, in the Final EIR). The western developable parcel would encompass the Air Cargo Component of the Proposed Project and exclude all of Site 7. The eastern constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment and its addition does not change the analysis in the EIR.
FAQ-HAZ-3	Are there any plans for ongoing monitoring and maintenance of hazardous materials after the completion of the Proposed Project?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Further, Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area. Additionally, as discussed in Section 3.8, groundwater remediation is ongoing under the ROD for CGO49/OU5 and includes monitoring and remediation of hazardous material contamination in groundwater. In addition, engineering controls are in place under the restrictive covenants for Parcel D-1 and Site 7. The Proposed Project would not interfere with any of these ongoing monitoring and remediation activities.
FAQ-HAZ-4	Are there any plans for public education and awareness	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, existing regulations require the on-site storage of hazardous materials above reportable quantities be reported to the local Certified

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
	campaigns regarding hazardous materials and waste management?	Unified Program Agency (Riverside County DEH). This public information is published through online databases and is available through public records requests. Additionally, as further discussed in Section 3.8, the March JPA General Plan requires enforcement of disclosure laws with respect to the production, handling, and transportation of hazardous materials.
FAQ-HAZ-5	Are there any plans for regular health assessments and monitoring of individuals potentially affected by hazardous materials?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, health and safety measures would be in place under the HMCP required by MM-HAZ-1 (Hazardous Materials Contingency Plan). These rules would follow CalOSHA rules and regulations, which also include worker safety monitoring for those exposed to hazardous materials. As further discussed in Section 3.8, CalOSHA has regulations in place that require workplace safety, monitoring, and training. The Proposed Project would be required to follow worker safety standards outlined in these regulations, and compliance is required by law. Additionally, MM-HAZ-2 (Stop Work, Groundwater Management) requires work to stop if groundwater is encountered, and regulatory authorities would be contacted.
		With implementation of MM-HAZ-1 and MM-HAZ-2 , as well as compliance with existing regulations, the Proposed Project would have a less-than-significant impact related to hazardous materials, and regular health assessment and monitoring of individuals is not required.
FAQ-HAZ-6	Are there any plans for remediation and cleanup of contaminated areas after the Proposed Project is completed?	Remediation of existing contamination that is unrelated to the Proposed Project is ongoing and engineering and institutional controls are in place for contaminated areas associated with former March AFB operations. Section 3.8, Hazards and Hazardous Materials, of the EIR discloses the list of open and ongoing regulatory cleanup cases and Activity and Use Limitations. The Proposed Project would not interfere with ongoing remediation and monitoring activities.
FAQ-HAZ-7	Are there any plans for the safe removal and disposal of hazardous wastes during construction?	MM-HAZ-1 (Hazardous Materials Contingency Plan) requires an HMCP, which would outline appropriate characterization, handling, transportation, and disposal requirements for environmental media contaminated with hazardous materials. As outlined in Section 3.8, Hazards and Hazardous Materials, of the EIR, applicable regulations require appropriate containerization, transportation, and disposal of hazardous wastes generated during construction, such as used oils or solvents.
FAQ-HAZ-8	Are there any plans in place to involve the local community in decision-making processes regarding hazardous materials and waste management?	Section 3.8, Hazards and Hazardous Materials, of the EIR discussed hazardous materials and waste management related to the Proposed Project. The Draft EIR was circulated for public review. Regulatory cleanup, hazardous material storage above reportable quantities, and manifests of hazardous waste are public information, which can be accessed via regulatory databases and public information requests.
FAQ-HAZ-9	Are there any plans in place to mitigate the risks associated with	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, existing activity and use limitations address groundwater use limitations associated with contaminated groundwater, including PFAS.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
	per- and polyfluoroalkyl substances (PFAS) contamination in the soil and groundwater?	Groundwater in the area does not have beneficial uses, and if groundwater is encountered, MM-HAZ-2 (Stop Work, Groundwater Management) requires work to stop and overseeing regulatory agencies to be notified. There are ongoing remedial activities related to PFAS in the groundwater that would not be impacted by the Proposed Project. The Proposed Project has been designed to avoid former burn pits that may have elevated concentrations of PFAS in soil. In addition, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires a site-specific HMCP to be prepared that includes procedures for evaluation of contaminated soils and soil vapor and procedures to handle any hazardous materials identified in these environmental media. The HCMP will be submitted to the EPA and expert state agencies prior to the start of construction for review of the protective measures during work within Site 7 because Site 7 is under Environmental Restrictive Covenants.
		Further, in response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project now includes a parcel map to subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11, Tentative Parcel Map, in the Final EIR). The western developable parcel would encompass the Air Cargo Component of the Proposed Project and exclude all of Site 7. The eastern constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment and its addition does not change the analysis in the EIR.
FAQ-HAZ-10	Are there any plans to implement disaster preparedness programs for the community?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, March JPA adopted a Disaster Preparedness and Recovery Plan within the Safety/Risk Management Element of its General Plan. This plan outlines the implementation programs needed to prevent risks to occupants and to minimize injury from an unavoidable disaster or emergency. With compliance with the March JPA General Plan Disaster Preparedness and Recovery Plan programs, impacts would be less than significant.
		An existing access roadway off Heacock Street, approximately 3.5 to 4 roadway miles east of the nearest I-215 on- and off-ramps, would be expanded to provide access to the project site. According to the March JPA General Plan's Transportation Element, Heacock Street is classified as a Major Arterial roadway, which provides access to I-215 to the north via Cactus Avenue (Arterial Highway) and to the south via San Michele Road (Minor Arterial), Indian Street (Minor Arterial), and Oleander Avenue (Arterial Highway). The proposed site plan, including the access roadway, would be reviewed and approved by MIPAA, RCFD, and RCSD during plan review to ensure that emergency access would be provided at all times. Therefore, impacts would be less than significant.
FAQ-HAZ-11	Are there any provisions for community outreach and education	Please refer to FAQ-HAZ-4, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
	programs on the risks associated with hazardous materials?	
FAQ-HAZ-12	Are there any provisions for emergency response and contingency planning in case of hazardous materials incidents?	Please refer to FAQ-HAZ-1, above.
FAQ-HAZ-13	Are there any provisions for ongoing monitoring and reporting of hazardous materials impacts on the environment?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, groundwater remediation is ongoing under the ROD for CG049/OU5, which includes monitoring and remediation of hazardous material contamination in groundwater. As discussed in Section 3.8, activity and use limitations are in place at the project site, specifically for Parcel D-1 due to the location within Site 7. A portion of Site 7 is already occupied by existing development south of the project site and would not be disturbed. The Proposed Project would leave the portion of Site 7 that includes the burn areas undisturbed. As part of construction of the Proposed Project, expansion of the existing access roadway to the south of the project site would slightly overlap with Site 7; however, it would avoid the burn areas within Site 7. There are Environmental Restrictive Covenants that apply to Site 7 and include notification to EPA and DTSC for specific activities at the project site. The Restrictive Covenants are enforceable by the State of California, U.S. Department of Air Force, and EPA. Additionally, the HCMP required by MM-HAZ-1 (Hazardous Materials Contingency Plan) would be submitted to EPA and DTSC for review/approval prior to the start of construction for review of the protective measures during work within Site 7. Further, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for
FAQ-HAZ-14	Are there any provisions for public access to information regarding hazardous materials used, stored, or disposed of at the project site?	operations within the March JPA Planning Area. Please refer to FAQ-HAZ-4, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-15	Are there any provisions for regular audits and inspections to verify compliance with hazardous materials management requirements?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Further, Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area. Please refer to FAQ-HAZ-67, below, for a discussion of cumulative impacts.
FAQ-HAZ-16	Are there any provisions for stakeholder engagement and consultation regarding hazardous materials management practices?	Please refer to FAQ-HAZ-8, above.
FAQ-HAZ-17	Are there any specific guidelines in place for the handling of asbestos during construction activities?	Section 3.8, Hazards and Hazardous Materials, of the EIR, discussed the National Emissions Standard for Asbestos, (CFR Title 29 Part 1926) regarding worker safety, asbestos regulations under CalOSHA, and SCAQMD Rules. Impact analysis Threshold HAZ-2 disclosed that improvements on the project site may include asbestos-containing materials (such as the fire house, facilities, equipment, and pipelines) and lead-based paint. Demolition and disposal of these materials without proper abatement and protective procedures could create an upset condition causing a release of hazardous materials. SCAQMD Rule 1403 requires the survey and proper abatement of asbestoscontaining materials, as well as worker protections and air monitoring. Adherence to these regulations would reduce the risk of upset and accident conditions with regard to asbestos.
FAQ-HAZ-18	Has the Proposed Project considered the potential contamination of soil from hazardous materials?	Section 3.8, Hazards and Hazardous Materials, of the EIR disclosed the potential for existing soil contamination on and around the project site. Potential impacts related to existing soil contamination would be mitigated by MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires an HMCP that outlines procedures for identification, characterization, handling, transportation, and disposal of contaminated and potentially contaminated soils. The EIR also analyzed the potential for soil contamination as a result of operation of the Proposed Project. As explained in Section 3.8:
		"Aircraft fueling would be subject to the MIP Airport Authority Rules and Regulations, which include BMPs for protection of stormwater (refer to Section 3.9, Hydrology and Water Quality). These protections include spill prevention and response procedures and BMPs for fueling that would reduce the likelihood for an upset or accident condition involving the release of fuels to soil and groundwater and include stormwater conveyances. Fueling would occur in designated paved areas by trained

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
		personnel and with spill protection measures in place. Specific spill protection measures (BMPs) would include placement of spill response kits adjacent to refueling locations (or equivalent measure as approved by MIPAA); kits would include sufficient materials to contain the likely release volume during fueling."
FAQ-HAZ-19	Has the report thoroughly assessed	Please refer to FAQ-HAZ-18, above, for a discussion of the potential for soil contamination.
	the risk of soil contamination and leaching of chemicals from the project site?	The EIR concludes that the Proposed Project would create a less-than-significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This includes an evaluation of potential spills during operation and impacts during construction that may impact existing soil contamination.
FAQ-HAZ-20	Has the report thoroughly assessed the risk of soil contamination from construction activities?	Please refer to FAQ-HAZ-19, above.
FAQ-HAZ-21	Has the report thoroughly assessed the risk of soil contamination from hazardous waste disposal related to the Proposed Project?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires an HMCP that outlines procedures for identification, characterization, handling, transportation, and disposal of contaminated and potentially contaminated soils. No hazardous waste will be disposed on the project site. Any hazardous waste that is generated during construction and operations would be handled in accordance with all existing hazardous materials handling laws and regulations.
FAQ-HAZ-22	How will the Proposed Project address any concerns raised by local residents regarding hazardous materials management?	Stakeholders and the public have been engaged multiple times throughout the last 3 years to address environmental concerns, including those regarding hazardous materials management. The NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 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 April 14, 2021, to gather additional public input on the Proposed Project. Comments raised during the NOP review period were addressed in the Draft EIR. The Draft EIR was distributed for a 45-day public review period from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024. The applicant held community meetings on June 18, 2024, July 1, 2024, and September 24, 2025. Written comments received during the Draft EIR public review period, including those regarding hazardous materials management, are addressed in the responses to comments in the Final EIR.
FAQ-HAZ-23	How will the Proposed Project address any potential environmental justice	As discussed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project is generally consistent with the relevant goals and policies of the March JPA General Plan, including the Environmental Justice Element, with implementation, as appropriate, of mitigation

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
	concerns related to hazardous materials and waste management?	measures. The project site is surrounded by industrial development and March ARB. The nearest disadvantaged community is approximately 0.5 miles east of the Proposed Project.
		As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, with implementation of MM-HAZ-1 (Hazardous Materials Contingency Plan) and MM-HAZ-2 (Stop Work, Groundwater Management), as well as compliance with existing regulations, the Proposed Project would have a less-than-significant impact related to hazardous materials and waste management.
FAQ-HAZ-24	How will the Proposed Project address any potential long-term sustainability issues related to hazardous materials and waste management?	Please refer to FAQ-HAZ-13, above.
FAQ-HAZ-25	HAZ-25 How will the Proposed Project address any potential risks of contamination to nearby water sources from hazardous materials?	As discussed in Section 3.8, Hazards and Hazardous Materials, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Further, Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area.
		In addition and as explained in Section 3.9, Hydrology and Water Quality, of the EIR, the Proposed Project would comply with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CASO00002 (Construction General Permit; SWRCB 2013) and the Proposed Project-specific WQMP (Appendix K-2 of the EIR), which contains source-control BMPs, low-impact development BMPs, and treatment-control BMPs (i.e., modular wetland systems) that address all water quality concerns associated with site development, in accordance with the Riverside County MS4 Permit, to prevent potential adverse Proposed Project-related water quality impacts.
FAQ-HAZ-26	How will the Proposed Project address any potential risks of exposure to hazardous materials for vulnerable populations in the area?	Please refer to FAQ-HAZ-23, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-27	How will the Proposed Project address any potential risks to groundwater quality and availability posed by hazardous materials?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, groundwater in the area does not have beneficial uses, and if groundwater is encountered, MM-HAZ-2 (Stop Work, Groundwater Management) will require work to stop and notification to the overseeing regulatory agencies. As explained in Section 3.9, Hydrology and Water Quality, of the EIR, the Proposed Project-specific WQMP (Appendix K-2) contains source-control BMPs, low-impact development BMPs, and treatment-control BMPs (i.e., modular wetland systems) that address all water quality concerns associated with site development, in accordance with the Riverside County MS4 Permit, to prevent potential adverse Proposed Project-related water quality impacts. In addition, the Proposed Project would add impervious surfaces within the Air Cargo Center Component boundary, as well as additional areas of impervious surfaces within the Off-Site Component boundary and the access roadway and intersection improvements (shown in EIR Table 3.9-3). Once constructed, there would be no exposure pathway to soil because the site would be covered with hardscape (concrete). As a result, the risk of contamination reaching groundwater from the surface would be reduced after development of the Proposed Project.
FAQ-HAZ-28	How will the Proposed Project address the potential safety hazards posed by the expansion and modification of the existing southern access roadway?	Section 3.8, Hazards and Hazardous Materials, of the EIR discloses existing contamination within the project site, including the southern access roadway. As part of construction of the Proposed Project, expansion of the existing access roadway to the south of the project site would slightly overlap with Site 7; however, it would avoid the burn areas within Site 7. Site 7 has documented soil, soil gas, and groundwater contamination and is currently under a deed restriction and Environmental Restrictive Covenants, which require notification to EPA and DTSC for specific activities at the project site. The Restrictive Covenants are enforceable by the State of California, U.S. Department of Air Force, and EPA. Additionally, the HCMP required by MM-HAZ-1 (Hazardous Materials Contingency Plan) would be submitted to EPA and DTSC for review/approval prior to the start of construction for review of the protective measures during work within Site 7.
FAQ-HAZ-29	How will the Proposed Project comply with the hazardous substances regulations enforced by the California Occupational Safety and Health Administration?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, all hazardous material handling is required to comply with all existing rules and regulations, include those promulgated by CalOSHA. Additionally, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires preparation of an HCMP to protect the health and safety of construction workers and future industrial workers. These rules would follow CalOSHA rules and regulations, which also include worker safety monitoring for those exposed to hazardous materials. As further discussed in Section 3.8, CalOSHA has regulations in place that require workplace safety, monitoring, and training. The Proposed Project would be required to follow worker safety standards outlined in these regulations, and compliance is required by law. The local Certified Unified Program Agency, Riverside County DEH, conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Further, Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
		material management requirements for operations within the March JPA Planning Area.
FAQ-HAZ-30	How will the Proposed Project ensure compliance with all relevant environmental laws and regulations related to hazardous materials?	Please refer to FAQ-HAZ-7, FAQ-HAZ-15, FAQ-HAZ-18, and FAQ-HAZ-21, above.
FAQ-HAZ-31	How will the Proposed Project ensure compliance with federal, state, and local regulations regarding the handling, transport, and disposal of hazardous materials?	Please refer to FAQ-HAZ-7, FAQ-HAZ-15, FAQ-HAZ-18, and FAQ-HAZ-21, above.
FAQ-HAZ-32	How will the Proposed Project ensure that all workers and contractors involved in hazardous materials management are properly trained and equipped?	In addition to legal compliance with rules and regulations outlined in Section 3.8, Hazards and Hazardous Materials, of the EIR, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires implementation of an HMCP, which includes training for proper handling of potentially contaminated soils. Additionally, CalOSHA and OSHA rules require training for all staff who may come into contact with hazardous materials or situations. The local Certified Unified Program Agency, Riverside County DEH, conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Further, Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area.
FAQ-HAZ-33	How will the Proposed Project ensure that hazardous materials are properly labeled and stored to prevent accidents and spills?	Please refer to FAQ-HAZ-7, FAQ-HAZ-15, FAQ-HAZ-18, and FAQ-HAZ-21, above.
FAQ-HAZ-34	How will the Proposed Project ensure that hazardous materials are stored, used, and transported in compliance with relevant regulations?	Please refer to FAQ-HAZ-7, FAQ-HAZ-15, FAQ-HAZ-18, and FAQ-HAZ-21, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-35	How will the Proposed Project impact the overall community resilience to environmental hazards?	Please refer to FAQ-HAZ-23, above.
FAQ-HAZ-36	What measures are in place to address potential safety hazards from increased air traffic?	Airport concerns are discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR under Threshold HAZ-4. The Proposed Project would comply with ALUCP Zone B2 regulations, which limits construction height, requires noise protection, and limits aboveground bulk hazardous material storage. FAA issued Determinations of No Hazard letters for the proposed cargo building. MM-HAZ-3 (Wildlife Protective Measures) requires the implementation of the recommendations of the Wildlife Hazard Review (Appendix J-3 of the EIR) to reduce safety risks posed by wildlife to aircraft in flight.
FAQ-HAZ-37	What measures are in place to address potential soil contamination from the Proposed Project?	Section 3.8, Hazards and Hazardous Materials, of the EIR disclosed existing soil contamination. Potential impacts as a result of the Proposed Project disturbing potentially contaminated soils would be mitigated by MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires an HMCP that outlines procedures for identification, characterization, handling, transportation, and disposal of contaminated and potentially contaminated soils. Aircraft fueling would be subject to the MIP Airport Authority Rules and Regulations and would minimize the risk of soil contamination from future operations. The Proposed Project would add impervious surfaces within the Air Cargo Center Component boundary, as well as additional areas of impervious surfaces within the Off-Site Component boundary and the access roadway and intersection improvements (shown in EIR Table 3.9-3). As a result, the Proposed Project would reduce possible exposure to soil. Finally, the Proposed Project would comply with all hazardous material handling laws and regulations, which would minimize the risk of possible future soil contamination.
FAQ-HAZ-38	What measures are in place to address potential soil remediation needs in the area?	Remediation is ongoing and engineering and institutional controls are in place for contaminated areas associated with former March AFB operations. Section 3.8, Hazards and Hazardous Materials, of the EIR disclosed the list of open and ongoing regulatory cleanup cases. MM-HAZ-1 (Hazardous Materials Contingency Plan) requires compliance with an HCMP, which shall include procedures for assessment, characterization, handling, transportation, and disposal of potentially contaminated soils and will have provisions that must be followed in the event that additional unexpected contamination is discovered during construction.
FAQ-HAZ-39	What measures are in place to ensure the safe disposal of construction debris and waste materials?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, construction debris would be characterized prior to disposal at the appropriate landfill, in accordance with all applicable hazardous materials handling laws and regulations. Further, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
		County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations.
FAQ-HAZ-40	What measures are in place to ensure the safe disposal of hazardous materials used during construction and operation?	Please refer to FAQ-HAZ-15, FAQ-HAZ-32, and FAQ-HAZ-39, above.
FAQ-HAZ-41	What measures are in place to ensure the safety of nearby residents in case of emergencies related to the Proposed Project?	Please refer to FAQ-HAZ-10, above.
FAQ-HAZ-42	What measures are in place to prevent potential safety hazards that could interfere with aircraft operations?	Please refer to FAQ-HAZ-36, above.
FAQ-HAZ-43	What measures are in place to prevent the disturbance of existing treatment systems (e.g., soil vapor extraction systems) during construction?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, under MM-HAZ-2 (Stop Work, Groundwater Management), the SVE system will not be disturbed during construction or operation of the Proposed Project. Groundwater extraction is not allowed under the restrictive covenant. MM-HAZ-2 also requires work to stop if groundwater is encountered and overseeing agencies to be notified.
FAQ-HAZ-44	What measures are in place to prevent the exposure of people or structures to significant risks of loss, injury, or death involving wildland fires?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the project site is not in or near Local or State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones. As a result, the Proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.
FAQ-HAZ-45	What measures are in place to prevent the release of hazardous materials and chemicals into the environment during and after construction?	Please refer to FAQ-HAZ-15, FAQ-HAZ-32 and FAQ-HAZ-39, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-46	What measures are in place to protect the local population from exposure to harmful chemicals or pollutants released by the Proposed Project?	The Proposed Project is sited in a location that would not result in a localized impact to sensitive receptors located in housing, schools, childcare facilities, and hospitals. The nearest sensitive receptor is approximately 0.5 miles east of the project site. As demonstrated in Section 3.2, Air Quality, of the EIR, based on construction and operational LST (NO2, CO, PM ₁₀ , and PM _{2.5}) analyses and the CO hot spot assessment, the Proposed Project is not anticipated to result in localized criteria pollutant impacts; therefore, no associated health effects are anticipated to result. Therefore, less-than-significant impacts would occur. The Proposed Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. Lastly, as identified in Section 3.8, Hazards and Hazardous Materials, of the EIR, the Proposed Project would have less-than-significant impacts related to hazards and hazardous materials with the incorporation of MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires the approval of an HMCP prior to the issuance of a grading permit; MM-HAZ-2 (Stop Work, Groundwater Management), which requires stop work orders and groundwater management relating to the existing soil vapor extraction system, and MM-HAZ-3 (Wildlife Protective Measures), which requires that the Proposed Project incorporate recommendations included in the Wildlife Hazard Review for the Proposed Project (Appendix J-3 of the EIR). The EIR includes numerous mitigation measures that will lessen impacts and protect the public, including MM-AQ-1 through MM-AQ-6 (Additional Air Quality Tenant
FAQ-HAZ-47	What measures are in place to protect the local population from exposure to harmful chemicals or pollutants?	Please refer to FAQ-HAZ-46, above.
FAQ-HAZ-48	What measures are in place to protect the local population from exposure to harmful pollutants and toxins?	Please refer to FAQ-HAZ-46, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

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Identifier	Question	Response
FAQ-HAZ-49	What measures will be taken to address any unforeseen hazards or risks that may arise during the Proposed Project's construction and operation?	Please refer to FAQ-HAZ-46, above.
FAQ-HAZ-50	What measures will be taken to ensure the equitable distribution of risks and benefits related to hazardous materials management?	Please refer to FAQ-HAZ-23, above.
FAQ-HAZ-51	What measures will be taken to ensure the health and safety of workers and residents in the vicinity of the project site?	Please refer to FAQ-HAZ-46, above.
FAQ-HAZ-52	What measures will be taken to ensure the long-term safety and health of workers and occupants in relation to hazardous materials?	Please refer to FAQ-HAZ-46, above.
FAQ-HAZ-53	What measures will be taken to ensure the safe and responsible disposal of hazardous wastes generated during the Proposed Project?	Please refer to FAQ-HAZ-15, FAQ-HAZ-32, and FAQ-HAZ-39, above.
FAQ-HAZ-54	What measures will be taken to ensure the safety of workers exposed to hazardous substances during construction?	Please refer to FAQ-HAZ-32, above.
FAQ-HAZ-55	What measures will be taken to ensure transparency and accountability in the handling of	Please refer to FAQ-HAZ-4, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
	hazardous materials throughout the Proposed Project?	
FAQ-HAZ-56	What measures will be taken to prevent the unauthorized release or disposal of hazardous materials during the Proposed Project?	Please refer to FAQ-HAZ-15, FAQ-HAZ-32, and FAQ-HAZ-39, above.
FAQ-HAZ-57	What role will the California Office of Emergency Services play in overseeing the handling and release of hazardous materials during the Proposed Project?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR and as required by law, any imminent or actual significant release (reportable quantity) must be reported to CalOES hazmat response center. The local Certified Unified Program Agency, Riverside County DEH, conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations.
FAQ-HAZ-58	What specific hazardous materials were historically used, stored, or disposed of at the former March AFB that could impact the project site?	Section 3.8, Hazards and Hazardous Materials, of the EIR disclosed site history, including hazardous material use, and included a list of open and active remediation activities that are overseen by regulatory agencies. As disclosed in Section 3.8, there is the potential for contaminated soils and soil vapor at the project site, including metals, PAHs, petroleum hydrocarbons, and per- and polyfluoroalkyl substances (PFAS) in soil and TCE in soil vapor.
FAQ-HAZ-59	What steps will be taken to address any gaps or deficiencies in the current hazardous materials management plan?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, an HMBP is required by state law and MM-HAZ-1 (Hazardous Materials Contingency Plan). The HMBP is updated and/or certified as accurate on an annual basis in accordance with state regulation. If changes are made to hazardous material storage on the project site, the HMBP must be updated within 30 days of the change as required by state regulation. All updates, changes, and annual certifications are submitted to the local Certified Unified Program Agency. The site is also subject to regular inspection by the local Certified Unified Program Agency in accordance with state regulation.
		For construction purposes, the HMBP is a living document that is reviewed and updated as needed to address changes in site conditions, deficiencies identified in the field, or changes to potential hazardous material impacts. Updates are made immediately upon identification of the change or deficiency, and notification of the change is distributed to the team during daily tailgate meetings.
FAQ-HAZ-60	What steps will be taken to address any gaps or inconsistencies in the current hazardous materials management plan?	Please refer to FAQ-HAZ-59, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-61	What steps will be taken to address any unforeseen hazards or risks that may arise during the Proposed Project's construction and operation?	Please refer to FAQ-HAZ-15, FAQ-HAZ-19, FAQ-HAZ-35, FAQ-HAZ-39, and FAQ-HAZ-59 above.
FAQ-HAZ-62	What steps will be taken to ensure that the Proposed Project does not exacerbate existing conditions of hazardous materials on the site?	Please refer to FAQ-HAZ-15, FAQ-HAZ-32, and FAQ-HAZ-39, above.
FAQ-HAZ-63	What steps will be taken to ensure the long-term sustainability of hazardous materials management practices at the Proposed project site?	Please refer to FAQ-HAZ-13, above.
FAQ-HAZ-64	What steps will be taken to ensure the proper disposal of hazardous materials to prevent long-term health impacts on the community?	Please refer to FAQ-HAZ-7, FAQ-HAZ-17, FAQ-HAZ-19, and FAQ-HAZ-46, above.
FAQ-HAZ-65	What steps will be taken to minimize the environmental impact of hazardous materials on surrounding ecosystems and wildlife?	MM-BIO-2 (Best Management Practices) requires biological monitoring; clearly marked work limits; restricting vehicle speed limits to 15 mph or slower to minimize the generation of fugitive dust; pet restrictions; measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and incorporation of native, non-invasive landscaping to minimize the spread of non-native invasive plant and animal species. MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting) provides additional BMPs to avoid the impact of hazardous substances on local waterways. MM-HYD-1 (Water Quality BMPs) requires BMPs to protect water quality; MM-HAZ-1 (Hazardous Materials Contingency Plan) requires the project applicant to implement an HMCP; MM-HAZ-2 (Stop Work, Groundwater Management) requires the applicant to contact EPA Region IX and the state to determine appropriate procedures to either manage contaminated groundwater or alter construction plans to avoid further contact with contaminated groundwater; and MM-AQ-6 (Additional Air Quality Tenant Requirements) requires the applicant to sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear,

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
		brake dust, and other contaminants. With implementation of these mitigation measures, impacts of hazardous materials on surrounding ecosystems and wildlife would be less than significant.
FAQ-HAZ-66	What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential hazards?	Please refer to FAQ-HAZ-46, above.
FAQ-HAZ-67	Are there any plans to monitor and address any cumulative impacts of handling, transporting, and disposing of hazardous materials from nearby projects?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, impacts associated with the Proposed Project are related to preexisting contamination due to historical activities. These impacts are not anticipated to be cumulative, as they would be controlled on the project site. Monitoring, handling, transporting, and disposing of hazardous materials is discussed in Section 3.8. An HMCP as described in MM-HAZ-1 (Hazardous Materials Contingency Plan) would reduce the risk of handling, transport, and disposal to less than significant. Impacts associated with hazardous materials are typically localized to the project site. Similar and nearby projects would also be required to adhere to federal, state, and local regulations that reduce the impacts of handling, transporting, and disposal of hazardous materials and reduce the impacts due to potential upset or accident conditions that could occur, either from the Proposed Project or from nearby projects. As such, no cumulative impacts would occur.
FAQ-HAZ-68	How will the Proposed Project ensure that impacts associated with hazardous materials are controlled and do not have cumulative effects?	Please refer to FAQ-HAZ-67, above.
FAQ-HAZ-69	What measures will be taken to ensure that the Proposed Project does not contribute to cumulative hazards in the area?	Please refer to FAQ-HAZ-67, above.
FAQ-HAZ-70	Are there any provisions for regular audits and inspections to ensure compliance with hazardous materials management requirements?	Please refer to FAQ-HAZ-67, above.

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
FAQ-HAZ-71	Are there any ongoing monitoring programs in place to track the levels of hazardous materials in the soil, soil gas, and groundwater at the project site?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, groundwater remediation is ongoing under the ROD for CG049/OU5, which would include monitoring and remediation of hazardous material contamination in groundwater, and engineering controls are in place under the restrictive covenants for the portion of the project site that includes Site 7. Additionally, the HCMP that is required pursuant to MM-HAZ-1 (Hazardous Materials Contingency Plan) would be submitted to EPA and DTSC for review and approval as to work within Site 7. Further, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area.
		Further, in response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project now includes a parcel map to subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11, Tentative Parcel Map, in the Final EIR). The western developable parcel would encompass the Air Cargo Component of the Proposed Project and exclude all of Site 7. The eastern constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment and its addition does not change the analysis in the EIR.
FAQ-HAZ-72	Are there any specific guidelines for the construction of drainage features and vegetation to minimize safety risks to aircraft?	As discussed under Threshold HAZ-4 in Section 3.8, Hazards and Hazardous Materials, of the EIR, the Wildlife Hazard Review (Draft EIR Appendix J-3) evaluated the Proposed Project in relation to applicable wildlife hazard management guidance and policies and provided recommendations for the Proposed Project plans, including landscaping, outdoor eating areas, trash receptacles, and type and placement of trees and shrubs. MM-HAZ-3 (Wildlife Protective Measures) requires the incorporation of these recommendations into the Proposed Project. With implementation of these protective measures, impacts to air safety resulting from implementation of the Proposed Project would be less than significant with mitigation incorporated.
		Additionally, as discussed in Section 3.9, Hydrology and Water Quality, of the EIR, on-site stormwater infrastructure would be developed in accordance with the design recommendations of the Preliminary Hydrology Study (Draft EIR Appendix K-1), which were developed to ensure that sufficient stormwater drainage and detention facilities are located on site and that potential areas of standing water for up to a 100-year storm are drawn down with 48 hours of a storm event in order

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
		to comply with FAA guidance pertaining to minimizing the potential to attract hazardous wildlife (AC No. 150/5200-33).
FAQ-HAZ-73	Has the Proposed Project considered the potential health risks associated with increased pollution?	Section 3.2, Air Quality, of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13 of the EIR, the Proposed Project would not exceed the SCAQMD LSTs during construction with the incorporation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14 of the EIR, the Proposed Project would not exceed the SCAQMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Proposed Project construction and operation. The Proposed Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
FAQ-HAZ-74	Has the Proposed Project considered the potential need for adaptive management strategies?	MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the building to achieve 2023 LEED Silver certification standards or equivalent at a minimum and includes specific commitments that will serve to reduce energy use and make the Proposed Project more sustainable. MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with 2022 CALGreen Tier 2. Accordingly, the Proposed Project would incorporate sustainable design and construction, which would lead to long-term energy efficiency and water conservation. Sustainable projects lead to long-term cost saving through reduced energy and water consumption, lower waste management costs, and increased property value. It is in the Proposed Project's interest to ensure long-term sustainability and environmental stewardship. As environmental regulations become more stringent and resource scarcity increases, sustainable projects are better positioned to adapt to future challenges and remain viable over the long term.
FAQ-HAZ-75	Has the report thoroughly assessed the risk of contamination of local soil and groundwater from construction activities?	Please refer to FAQ-HAZ-5, FAQ-HAZ-18 and FAQ-HAZ-19, above.
FAQ-HAZ-76	How will the Proposed Project address the	Contamination is thoroughly addressed and characterized in Section 3.8, Hazards and Hazardous Materials, of the EIR. Restrictive covenants in place at the site limit activities to avoid contact with

Table II.5-10. Hazards and Hazardous Materials FAQ Responses

Identifier	Question	Response
	contamination of chlorinated VOCs, particularly TCE, in the soil, soil gas, and groundwater?	contaminated media. Additionally, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires an HMCP be in place that addresses the potential impacts to soil, soil vapor, and groundwater beneath the project site to ensure the health and safety of construction workers and future occupants of the industrial uses on the site. It shall include procedures for assessment, characterization, handling, transportation, and disposal of potentially contaminated soils and soil vapor, including metals, PAHs, petroleum hydrocarbons, and per- and polyfluoroalkyl substances (PFAS) in soil and TCE in soil vapor. There is no evidence of TCE in soil at the project site, and the Proposed Project is not anticipated to encounter groundwater during construction. If groundwater is encountered, MM-HAZ-2 (Stop Work, Groundwater Management) requires work to stop and overseeing agencies to be notified.
FAQ-HAZ-77	How will the Proposed Project ensure the safety of workers and future occupants in light of the documented soil, soil gas, and groundwater contamination at Site 7?	Please refer to FAQ-HAZ-28, above.
FAQ-HAZ-78	What are the potential health risks associated with exposure to PFOS and PFOA in the soil and groundwater at the project site?	Please refer to FAQ-HAZ-27, above. As disclosed in Section 3.8, Hazards and Hazardous Materials, of the EIR, the soils at the project site are potentially impacted with per- and polyfluoroalkyl substances (PFAS). Implementation of MM-HAZ-1 (Hazardous Materials Contingency Plan) will ensure the health and safety of construction workers and future industrial workers at the project site. Once constructed, there would be no exposure pathway to soil because the site would be covered with hardscape (concrete). As such, the potential health risks associated with PFAS at the project site would be less than significant. For general health risk associated with PFAS, see: https://www.epa.gov/pfas/our-current-understanding-human-health-and-environmental-risks-pfas.

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
FAQ-HYD-1	Are there any plans to address the potential disruption of natural drainage patterns and flood risks due to the Proposed Project?	In Section 3.9, Hydrology and Water Quality, of the EIR, Threshold HYD-3 and Threshold HYD-4 analyzed how implementation of the Proposed Project would result in minor alterations to existing drainage patterns on the project site through installation of drainage infrastructure, such as drainage pipes, culverts, and two modular wetland biofiltration systems. Site development would reconfigure some of the on-site drainage areas and result in slight changes to localized flow patterns; however, these changes would not have adverse impacts with regard to

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
		stormwater runoff because they would occur in a manner that would maintain the general location, flow rate, and flow volume of off-site discharge (Appendix K-1 of the EIR).
		On-site stormwater infrastructure would be developed in accordance with the design recommendations of the Preliminary Hydrology Study (Appendix K-1 of the EIR), which were developed to ensure that sufficient stormwater drainage and detention facilities are located on site and that potential areas of standing water for up to a 100-year storm are drawn down within 48 hours of a storm event in order to comply with FAA guidance pertaining to minimizing the potential to attract hazardous wildlife (AC No. 150/5200-33). These recommendations include specifications for stormwater conveyance lines, catch basins, and underground detention basins to manage stormwater runoff in a manner that would prevent on-site flooding.
		Based on the results of the Preliminary Hydrology Study (Appendix K-1 of the EIR), the Proposed Project would not alter on-site drainage such that increased peak discharges would result in on- or off-site erosion and siltation of downstream water bodies. In addition, the Proposed Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on site or off site. Impacts would be less than significant.
		Threshold HYD-5 and Threshold HYD-6 in Section 3.9 of the EIR indicate that the project site would not be subject to flooding due to 100-year flooding, dam failure inundation, tsunamis, or seiches. According to FEMA, the project site is higher than the 100-year flood elevation of 1,486.4 feet NAVD 88. In addition, the Preliminary Hydrology Study included a ponding analysis, which verifies that the proposed on-site development would not increase the drawdown time of the airfield ponds or overtop the shoulder of Taxiway A (Appendix K-1 of the EIR). Because the project site is not subject to flooding, the Proposed Project would not substantially alter the existing drainage pattern of the site or area such that flood flows would be impeded or redirected. No impacts would occur.
FAQ-HYD-2	Are there any plans to monitor and manage contaminated groundwater encountered during excavation activities?	As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, three Military Cleanup Cases, including a subarea known as Site 7, are located adjacent to the project site (see Figure 2-1 of the EIR). Based on known groundwater conditions beneath the project site (i.e., at depths of 14.5 to 20 feet below the surface) versus the maximum depth of excavation (10 feet), it is not anticipated that groundwater would be encountered. If groundwater is encountered during excavation, MM-HAZ-2 (Stop Work, Groundwater Management) would require stopping work activities, followed by contacting the Santa Ana RWQCB, MIPAA, the March ARB environmental group, and EPA Region IX, all of which oversee the cleanup of CGO49/OU5 (including Site 7), to determine appropriate procedures to either manage contaminated groundwater or alter construction plans to avoid further contact with contaminated groundwater. Implementation of MM-HAZ-2 would avoid the potential to discharge contaminated groundwater or to temporarily affect contamination plumes. Therefore, the impact of the Proposed

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
		Project on groundwater quality during construction would be less than significant with mitigation incorporated.
FAQ-HYD-3	Are there any plans to prevent water contamination from airport operations?	As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, compliance with applicable permit conditions and required implementation of water quality BMPs during operation and maintenance of the Proposed Project would eliminate or substantially minimize potential adverse impacts on water quality. The Proposed Project-specific WQMP (Appendix K-2 of the EIR) describes and illustrates how the Proposed Project would comply with the Riverside County MS4 Permit requirements. Source control and operational BMPs have been incorporated into the project design, including site design BMPs, source control BMPs, treatment control BMPs, and operation and maintenance requirements. In addition, MM-HYD-1 (Water Quality BMPs) will be implemented to reduce impacts on water quality. MM-AQ-6 (Additional Air Quality Tenant Requirements) requires that the tenant sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants. The airplane fueling operations that would occur on the parking aprons to the north and west of the proposed cargo building, as well as any maintenance activities and equipment cleaning operation within the proposed cargo building, would be subject to the requirements of the NPDES Industrial General Permit. MIPAA would either modify the existing Industrial SWPPP to include the Proposed Project facilities or would develop a separate Industrial SWPPP for the Proposed Project facilities. All Proposed Project operations would also be subject to the applicable stormwater quality BMPs specified in the MIPAA Rules and Regulations. However, the Proposed Project-specific WQMP would be effective on its own at substantially minimizing pollutant discharges to the storm drain system (and downstream receiving waters). Because the Proposed Project-specific WQMP contains source-control BMPs, low-impact development, in accordance with the Riverside County MS4 Permit, potential adverse Proposed Project-related water quality impacts related to operatio
FAQ-HYD-4	Has the potential impact on groundwater been thoroughly assessed?	Please refer to FAQ-HYD-1, above. In Section 3.9, Hydrology and Water Quality, of the EIR, Threshold HYD-2 analyzed the Proposed Project's impacts to groundwater. Operation of the Proposed Project would not involve the direct use of groundwater because potable water would be supplied to the site by WMWD. As discussed in Section 3.14, Utilities and Service Systems, of the EIR, the Proposed Project's water demand has been incorporated into WMWD's water supply planning documents, including the conclusion within its 2020 Urban Water Management Plan. This conclusion states that WMWD has sufficient supplies over the next 20 years to meet expected demands for customers and member agencies from 2020 through 2045 under normal, single-dry-year, and multiple-dry-year conditions. Although the groundwater sustainability plan has not yet been formally adopted for the West San Jacinto Groundwater Basin (it is in process),

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
		the available evidence indicates that implementation of the Proposed Project would not interfere with sustainable groundwater management within the San Jacinto Groundwater Basin. As a result, impacts related to groundwater would be less than significant.
FAQ-HYD-5	Has the Proposed Project considered the potential runoff and drainage issues from the project site?	Please refer to FAQ-HYD-1, above.
FAQ-HYD-6	Has the report considered the impact of the Proposed Project on groundwater resources in the area?	Please refer to FAQ-HYD-4, above.
FAQ-HYD-7	Has the report considered the impact of the Proposed Project on local water quality and aquatic ecosystems?	Section 3.3, Biological Resources, of the EIR analyzes impacts to wetlands in Threshold BIO-3 of the impacts analysis. As required by MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting), the Proposed Project shall mitigate at not less than 1:1 with reestablishment credits (0.45 acres USACE/0.45 acres RWQCB/0.49 acres CDFW) for impacts to aquatic resources as part of an overall strategy to ensure no net loss. The Proposed Project's impacts to wetlands would be less than significant with mitigation incorporated.
		As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, impacts related to water quality standards and groundwater would be reduced to a less-than-significant level with implementation of MM-HYD-1 (Water Quality BMPs), which requires BMPs to protect water quality; MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires the project applicant to implement an HMCP; MM-HAZ-2 (Stop Work, Groundwater Management), which requires the applicant to contact EPA Region IX and the state to determine appropriate procedures to either manage contaminated groundwater or alter construction plans to avoid further contact with contaminated groundwater; and MM-AQ-6 (Additional Air Quality Tenant Requirements), which requires the applicant to sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants. All other impacts related to hydrology and water quality would not occur or would be less than significant.
FAQ-HYD-8	Has the report considered the impact of the Proposed Project on nearby water bodies and aquatic ecosystems?	Please refer to FAQ-HYD-7, above.

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
FAQ-HYD-9	Has the report considered the impact of the Proposed Project on nearby wetlands and waterways?	Please refer to FAQ-HYD-7, above.
FAQ-HYD-10	Has the report thoroughly assessed the risk of contamination of local water sources and aquifers due to the Proposed Project?	Please refer to FAQ-HYD-4, above.
FAQ-HYD-11	Has the report thoroughly assessed the risk of flooding in the area due to the Proposed Project?	Please refer to FAQ-HYD-1, above.
FAQ-HYD-12	How will the Proposed Project address the potential risks associated with construction activities near contaminated groundwater wells?	Please refer to FAQ-HYD-2, above.
FAQ-HYD-13	How will the Proposed Project affect the quality of water sources in the vicinity?	Please refer to FAQ-HYD-4, above.
FAQ-HYD-14	How will the Proposed Project ensure that contaminated groundwater is properly managed and treated if encountered during construction?	Please refer to FAQ-HYD-2, above.
FAQ-HYD-15	How will the Proposed Project impact the availability of clean drinking water for residents in the region?	Please refer to FAQ-HYD-4, above.

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
FAQ-HYD-16	How will the Proposed Project impact the overall water quality in the region?	Please refer to FAQ-HYD-4 and FAQ-HYD-7, above.
FAQ-HYD-17	What measures are in place to address potential water pollution from airport operations?	Please refer to FAQ-HYD-3, above.
FAQ-HYD-18	What measures are in place to prevent the release of pollutants and contaminants into the air and water during construction?	Please refer to FAQ-HYD-2, above. As discussed in Section 3.2, Air Quality, of the EIR, the increase in criteria air pollutant emissions from construction of the Proposed Project would be reduced to less than significant through implementation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements).
FAQ-HYD-19	What measures are in place to protect local water bodies from pollution during and after construction?	Please refer to FAQ-HYD-3 and FAQ-HYD-7, above.
FAQ-HYD-20	What measures are in place to protect the local watershed and prevent water pollution from the Proposed Project?	Please refer to FAQ-HYD-3 and FAQ-HYD-7, above.
FAQ-HYD-21	What measures are in place to protect water quality in the surrounding areas?	Please refer to FAQ-HYD-3 and FAQ-HYD-7, above.
FAQ-HYD-22	What measures will be taken to prevent the spread of contaminated groundwater during construction activities?	Please refer to FAQ-HYD-2, above.
FAQ-HYD-23	What procedures will be followed in case of groundwater contamination during construction?	Please refer to FAQ-HYD-2, above.
FAQ-HYD-24	Are there any ongoing monitoring programs in place to track the levels of hazardous	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, groundwater remediation is ongoing under the ROD for CG049/OU5, which would include monitoring and remediation of hazardous material contamination in groundwater, and engineering

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
	materials in the soil, soil gas, and groundwater at the project site?	controls are in place under the restrictive covenants for the portion of the project site that includes Site 7. Additionally, the HCMP that is required pursuant to MM-HAZ-1 (Hazardous Materials Contingency Plan) would be submitted to EPA and DTSC for review as to work within Site 7. In accordance with applicable regulations, and as described in Threshold HAZ-1, regulations require plans and reporting for the use, storage, and transport of hazardous materials and petroleum products stored at any site above reportable quantities. Compliance with these rules and regulations is required by law.
FAQ-HYD-25	Are there any plans in place to mitigate the risks associated with per- and polyfluoroalkyl substances (PFAS) contamination in the soil and groundwater?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, existing activity and use limitations address groundwater use limitations associated with contaminated groundwater, including PFAS. Groundwater in the area does not have beneficial uses, and if groundwater is encountered, MM-HAZ-2 (Stop Work, Groundwater Management) requires a stop work and notification of the overseeing regulatory agencies. There are ongoing remedial activities related to PFAS in the groundwater that would not be impacted by the Proposed Project. The Proposed Project has been designed to avoid former burn pits that may have elevated concentrations of PFAS in soil. In addition, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires a site-specific HMCP to be prepared that includes procedures for evaluation of contaminated soils and soil vapor, as well as procedures to handle any hazardous materials identified in these environmental media. The HCMP will be submitted to the EPA and expert state agencies prior to the start of construction for review of the protective measures during work within Site 7 because Site 7 is under Environmental Restrictive Covenants.
FAQ-HYD-26	Has the report thoroughly assessed the risk of air and water pollution from the Proposed Project's operations?	The EIR prepared for the Proposed Project includes a thorough assessment of air quality impacts in Section 3.2, Air Quality, with details of the analysis provided as Appendices B-1 and C-1. The analysis was prepared consistent with professional standards using SCAQMD-approved modeling tools and comparing impacts with thresholds of significance established by SCAQMD, an expert agency regarding air quality. Water pollution was thoroughly addressed in Section 3.9, Hydrology and Water Quality, with supporting technical appendices provided as K-1
FAQ-HYD-27	How will the Proposed Project address any potential risks of contamination to nearby water sources from hazardous materials?	and K-2 in the EIR. Section 3.8, Hazards and Hazardous Materials, of the EIR discusses the rules and regulations associated with ongoing use and handling of hazardous materials and hazardous wastes, including regulatory reporting and spill control procedures for reportable quantities. In addition and as explained in Section 3.9, Hydrology and Water Quality, of the EIR, the Proposed Project would comply with the NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ, NPDES No. CAS000002 (Construction General Permit; SWRCB 2013) and the Proposed Project-specific WQMP (Appendix K-2 of the EIR), which contains source-control BMPs, low-impact development BMPs, and treatment-control BMPs (i.e., modular wetland systems) that address all water quality concerns associated with site development, in accordance

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
•		with the Riverside County MS4 Permit, to prevent potential adverse Proposed Project-related water quality impacts.
FAQ-HYD-28	How will the Proposed Project address any potential risks to groundwater quality and availability posed by hazardous materials?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, groundwater in the area does not have beneficial uses, and if groundwater is encountered, MM-HAZ-2 (Stop Work, Groundwater Management) requires a stop work and notification of the overseeing regulatory agencies. As explained in Section 3.9, Hydrology and Water Quality, of the EIR, the Proposed Project-specific WQMP (Draft EIR Appendix K-2) contains source-control BMPs, low-impact development BMPs, and treatment-control BMPs (i.e., modular wetland systems) that address all water quality concerns associated with site development, in accordance with the Riverside County MS4 Permit, to prevent potential adverse Proposed Project-related water quality impacts. In addition, the Proposed Project would add approximately 21 acres of impervious surfaces within the Air Cargo Center Component boundary, as well as additional areas of impervious surfaces within the Off-Site Component boundary and the access roadway and intersection improvements (shown in Table 3.9-3 of the EIR). As a result, the risk of contamination reaching groundwater from the surface would be reduced after development of the Proposed Project.
FAQ-HYD-29	How will the Proposed Project address the contamination of chlorinated VOCs, particularly trichloroethylene (TCE), in the soil, soil gas, and groundwater?	Contamination is thoroughly addressed and characterized in Section 3.8, Hazards and Hazardous Materials, of the EIR. Restrictive covenants in place at the site limit activities to avoid contact with contaminated media. Additionally, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires an HMCP be in place that addresses the potential impacts to soil, soil vapor, and groundwater beneath the project site to ensure the health and safety of construction workers and future occupants of the industrial uses on the site. It shall include procedures for assessment, characterization, handling, transportation, and disposal of potentially contaminated soils and soil vapor, including metals, PAHs, petroleum hydrocarbons, and per- and polyfluoroalkyl substances (PFAS) in soil and TCE in soil vapor. There is no evidence of TCE in soil at the project site, and the Proposed Project is not anticipated to encounter groundwater during construction. If groundwater is encountered, MM-HAZ-2 (Stop Work, Groundwater Management) requires a stop work and notification of the overseeing regulatory agencies.
FAQ-HYD-30	What measures will be taken to ensure the health and safety of workers and residents in the vicinity of the project site?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, materials used, transported, and stored on site would be handled in accordance with federal, state, and local regulations. If quantities of hazardous materials are stored at greater than applicable reportable quantities, the appropriate plans, permits, and reporting would be completed, such as spill prevention, control, and countermeasure plans for oil storage in accordance with EPA requirements; HMBPs for hazardous material storage in accordance with CalEPA and Riverside County DEH requirements; and hazardous waste storage, disposal, and reporting in accordance with RCRA requirements. MIPAA requires submittal of these plans prior to issuance of operational permits and/or occupancy permits, further reducing the potential for a hazard due to use, transportation, or disposal of hazardous materials. The local

Table II.5-11. Hydrology and Water Quality FAQ Responses

Identifier	Question	Response
		Certified Unified Program Agency, Riverside County DEH, conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Compliance is required by law. These rules also take into consideration safe handling to avoid emissions and harmful releases. In addition to legal compliance with rules and regulations outlined in Section 3.8 of the EIR, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires implementation of an HMCP, which includes training for proper handling of potentially contaminated soils. Additionally, CalOSHA and OSHA rules require training for all staff who may come into contact with hazardous materials or situations.
		As discussed in Section 3.2, Air Quality, of the EIR, the Proposed Project's less-than-significant construction-source emissions would be further reduced with implementation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). The Proposed Project would implement MM-AQ-3 (Improved Energy Efficiency and Water Reduction), MM-AQ-4 (Truck Requirements), MM-AQ-5 (Commute Trip Reduction), and MM-AQ-6 (Additional Air Quality Tenant Requirements), which would reduce the Proposed Project's VOC, NOx, and CO emissions, but operational-source emissions would continue to exceed the regional thresholds of significance for VOC, NOx, and CO emissions.

Table II.5-12. Land Use and Planning FAQ Responses

Identifier	Question	Response		
FAQ-LU-1	Can the report provide more details on how the Proposed Project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	In Section 3.10, Land Use and Planning, in the EIR, Table 3.10-1 evaluated the Proposed Project's consistency with March JPA General Plan policies related to reducing emissions associated with vehicle/engine use and encouraging energy-efficient equipment and design in the Planning Area and determined the Proposed Project would be generally consistent with mitigation incorporated. MM-AQ-1 (Construction Management Plan) requires all heavy-duty trucks hauling onto the project site to be model year 2014 or later, which would improve fuel efficiency. MM-AQ-2 (Construction Requirements) requires the use of electric-powered hand tools, forklifts, and pressure washers, to the extent feasible, along with a designated charging area, and limits construction equipment idling to no more than 3 minutes. MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the annual provision of information to employees and truck drivers about EV charging availability, alternate transportation opportunities for commuting, the Voluntary Interindustry Commerce Solutions "Empty Miles" program to improve goods trucking efficiencies, and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. MM-AQ-4 (Truck Requirements) limits truck idling to 3 minutes. MM-AQ-5 (Commute Trip Reduction) requires any tenant agreement to include 5% reserved parking spaces for carpools and vanpools, provision of short- and long-term bicycling parking facilities and "end-		

Table II.5-12. Land Use and Planning FAQ Responses

Identifier	Question	Response
		of-trip" facilities, on-site food vending or kitchen equipment and mail facilities, and establishment of a rideshare program with financial incentives. MM-GHG-1 (Installation of EV Charging Stations) requires that the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with the 2022 CALGreen Tier 2.
FAQ-LU-2	How will the Proposed Project address any potential conflicts with neighboring land uses and communities regarding hazardous materials?	As discussed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project is generally consistent with the relevant goals and policies of the March JPA General Plan, including the Environmental Justice Element, with implementation, as appropriate, of mitigation measures. The project site is surrounded by industrial development and March ARB. The nearest residential area is approximately 0.5 miles to the east.
		As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, with implementation of MM-HAZ-1 (Hazardous Materials Contingency Plan) and MM-HAZ-2 (Stop Work, Groundwater Management), as well as compliance with existing regulations, the Proposed Project would have a less-than-significant impact related to hazardous materials and waste management.
FAQ-LU-3	How will the Proposed Project impact the overall community cohesion and social dynamics?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not result in the physical division of an established community. The project site is located west of Heacock Street, adjacent to March ARB, and southwest of the intersection of Heacock Street and Krameria Avenue, in unincorporated Riverside County, California (Figure 1-1 in the EIR). The March ARB Fire Department facility is immediately north of the project site, and industrial warehouse facilities occupied by Hanes/DDI and an air cargo center occupied by KRIV-Amazon are immediately south of the site. Along the Heacock Street corridor abutting the site to the east are a variety of industrial and business park warehouse uses within the City of Moreno Valley. The nearest residential area is approximately 0.5 miles to the east. I-215 is approximately 1 mile west of the project site.
FAQ-LU-4	How will the Proposed Project impact the overall sense of community in the area?	Please refer to FAQ-LU-3, above.
FAQ-LU-5	What measures are in place to ensure the Proposed Project's compliance with all relevant zoning and land use regulations?	As discussed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project is generally consistent with the relevant goals and policies of the March JPA General Plan, including the Environmental Justice Element, with implementation, as appropriate, of mitigation measures (see EIR Table 3.10-1). The Proposed Project would involve processing a zoning designation of Aviation (A) for the 34-acre Air Cargo Center Component, which would be consistent with the existing General Plan designation of AV for this portion of the project site. As shown in Table 3.10-2 of the EIR, the Proposed Project would comply with the March JPA Development Code standards. With incorporation of MM-LU-1 (Occupancy Limits), MM-NOI-1 (Construction Worker

Table II.5-12. Land Use and Planning FAQ Responses

Identifier	Question	Response
		Hearing Protection), and MM-NOI-2 (Future Tenant Aircraft Fleet), the Proposed Project would be consistent with the March ARB/Inland Port Airport ALUCP.
FAQ-LU-6	What specific goals and policies from the Local March Joint Powers Authority General Plan are being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	Section 3.10, Land Use and Planning, and Table 3.10-1 of the EIR demonstrate how the Proposed Project is consistent with the applicable goals and policies of the March JPA General Plan related to GHG emissions, noise, and air quality. These include, but are not limited to, Noise/Air Quality Element Goal 1 (Ensure that land uses are protected from excessive and unwanted noise), 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), and Goal 4 (Pursue reduced emissions for stationary and mobile sources through the use and implementation of new and advancing technologies) and Environmental Justice Element Policy 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 GHG emissions to avoid or minimize creating adverse conditions for adjacent communities). As discussed in Table 3.10-1 of the EIR, the Proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Where appropriate, mitigation measures are included to reduce and/or avoid potential conflicts with applicable goals adopted for the purpose of avoiding or mitigating GHG, noise and AQ impacts, including MM-NOI-1 (Construction Worker Hearing Protection) and MM-NOI-2 (Future Tenant Aircraft Fleet), MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements), and MM-GHG-1 (Installation of EV Charging Stations).
FAQ-LU-7	How will the Proposed Project address any potential conflicts with existing land use regulations and zoning laws regarding hazardous materials?	As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Further, Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area.

Table II.5-13. Miscellaneous FAQ Responses

Identifier	Question	Response
FAQ-MISC-1	Are there any plans to address the potential loss of community cohesion and sense of belonging due to the Proposed Project?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not result in the physical division of an established community. The project site is west of Heacock Street, adjacent to March ARB, and southwest of the intersection of Heacock Street and Krameria Avenue, in unincorporated Riverside County, California (Figure 1-1 in the EIR). The March ARB Fire Department facility is immediately north of the project site, and industrial warehouse facilities occupied by Hanes/DDI and an air cargo center occupied by KRIV-Amazon are immediately south of the site. Along the Heacock Street corridor abutting the site to the east are a variety of industrial and business park warehouse uses within the City of Moreno Valley. The nearest residential area is approximately 0.5 miles to the east. I-215 is approximately 1 mile west of the project site.
FAQ-MISC-2	Are there any plans to establish a contingency fund for environmental mitigation efforts?	Under PDF-TRA-1, the Proposed Project would pay all the necessary fair-share fees associated with development. The MMRP identifies the enforcement agency(ies) for each project design feature and mitigation measure included in the EIR. In addition, the MMRP identifies the Proposed Project phase when the monitoring/reporting would occur, as well as the method of the monitoring/reporting.
FAQ-MISC-3	Has the Proposed Project considered the impact on property values in the surrounding area?	Property values are outside the scope of CEQA. The significance criteria used to evaluate the Proposed Project's impacts are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and, as applicable, the March JPA CEQA Guidelines, neither of which require that impacts to property values be analyzed within a CEQA document. As discussed in Section 3.10, Land Use and Planning, of the EIR, with approval of the proposed Aviation (A) Zoning Designation, the Proposed Project would be consistent with the General Plan land use designation and zoning district.
FAQ-MISC-4	Has the Proposed Project considered the potential impact of increased aviation activities on local weather patterns?	CEQA requires the EIR to disclose direct and indirect impacts of the Proposed Project that are reasonably foreseeable. The Proposed Project's impacts to local weather patterns, if any, are too speculative to reliably evaluate and disclose.
FAQ-MISC-5	Has the Proposed Project considered the potential need for adaptive management strategies?	MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the building to achieve 2023 LEED Silver certification standards or equivalent at a minimum and includes specific commitments that will serve to reduce energy use and make the Proposed Project more sustainable. MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with 2022 CALGreen Tier 2. Accordingly, the Proposed Project would incorporate sustainable design and construction, which would lead to long-term energy efficiency and water conservation. Sustainable projects lead to long-term cost saving through reduced energy and water consumption, lower waste management costs, and increased property value. It is in the Proposed Project's interest to ensure long-term sustainability and environmental stewardship. As environmental regulations become more stringent and resource scarcity increases, sustainable projects are better positioned to adapt to future challenges and remain viable over the long term.

Table II.5-13. Miscellaneous FAQ Responses

Identifier	Question	Response
FAQ-MISC-6	Has the Proposed Project considered the potential need for independent environmental audits and reviews?	Regulatory oversight for specific resources is maintained at the federal, state, and local levels. Applicable laws, regulations, and standards are included in resource subsections within Chapter 3, Environmental Analysis, of the EIR. The MMRP identifies the enforcement agency(ies) for each project design feature and mitigation measure included in the EIR. In addition, the MMRP identifies the Proposed Project phase when the monitoring/reporting would occur, as well as the method of the monitoring/reporting.
FAQ-MISC-7	Has the report considered the impact of the Proposed Project on property values and real estate in the surrounding area?	Please refer to FAQ-MISC-3, above.
FAQ-MISC-8	How does the Meridian D-1 Gateway Aviation Center Project plan to address the potential impact on winter tourism and the ski season due to climate change, specifically in terms of mitigating the reduction in ski season length at lower elevations as mentioned in the report?	Impacts on winter tourism and the ski season are outside the scope of CEQA. The significance criteria used to evaluate the Proposed Project's impacts are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and, as applicable, the March JPA CEQA Guidelines, neither of which require that impacts on winter tourism and the ski season be analyzed within a CEQA document.
FAQ-MISC-9	How will the Proposed Project impact the overall sense of community in the area?	Please refer to FAQ-MISC-1, above.
FAQ-MISC- 10	What measures are in place to address potential public health crises in the region?	As discussed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project is generally consistent with the relevant goals and policies of the March JPA General Plan, including the Environmental Justice Element, with implementation, as appropriate, of mitigation measures. The project site is surrounded by industrial development and March ARB. The nearest residential area is approximately 0.5 miles to the east.
		As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, with implementation of MM-HAZ-1 (Hazardous Materials Contingency Plan) and MM-HAZ-2 (Stop Work, Groundwater Management), as well as compliance with existing regulations, the Proposed Project would have a less-than-significant impact related to hazardous materials and waste management.

Table II.5-13. Miscellaneous FAQ Responses

Identifier	Question	Response
FAQ-MISC- 11	What measures are in place to ensure the Proposed Project's long-term sustainability and environmental stewardship?	MM-AQ-1 (Construction Management Plan) requires all heavy-duty trucks hauling onto the project site to be model year 2014 or later, which would improve fuel efficiency. MM-AQ-2 (Construction Requirements) requires the use of electric-powered hand tools, forklifts, and pressure washers, to the extent feasible, along with a designated charging area, and limits construction equipment idling to no more than 3 minutes. MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the annual provision of information to employees and truck drivers about EV charging availability, alternate transportation opportunities for commuting, the Voluntary Interindustry Commerce Solutions "Empty Miles" program to improve goods trucking efficiencies, and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. MM-AQ-4 (Truck Requirements) limits truck idling to 3 minutes. MM-AQ-5 (Commute Trip Reduction) requires any tenant agreement to include 5% reserved parking spaces for carpools and vanpools, provision of short- and long-term bicycling parking facilities and "end-of-trip" facilities, on-site food vending or kitchen equipment and mail facilities, and establishment of a rideshare program with financial incentives. MM-GHG-1 (Installation of EV Charging Stations) requires that the Proposed Project include the circuitry, capacity, and equipment for EV charging stations in accordance with the 2022 CALGreen Tier 2.
FAQ-MISC- 12	What measures are in place to protect the local population from the spread of diseases or health hazards associated with the Proposed Project?	Please refer to FAQ-MISC-10, above.

Table II.5-14. Noise FAQ Responses

Identifier	Question	Response
FAQ-NOI-1	Are there any plans to address potential noise pollution from increased aviation activities?	In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.).
		Operation of the air cargo center would be similarly reduced. The number of trips would be reduced by approximately 30%, as would annual flight operations, resulting in the total annual cargo aircraft operations of 7,488 flights. Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. MM-NOI-1 (Construction Worker Hearing Protection) and MM-NOI-2 (Future Tenant Aircraft Fleet) would be implemented under Alternative 6 and noise impacts would less than

Table II.5-14. Noise FAQ Responses

Identifier	Question	Response	
		significant with mitigation incorporated. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.	
		Additionally, MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided to MIPAA confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review would be required as part of a discretionary action to revise the conditions of approval. Such documentation would confirm that the residential areas that would experience a significant noise increase due to aircraft operations would be equal to or less than those disclosed under Threshold NOI-3 for Alternative 6. This means that the predicted Proposed Project aviation noise contributions to a future ambient noise level, as shown in Table 3.11-56 of the EIR, represent a cap on such foreseen contributions from future tenant fleets.	
FAQ-NOI-2	Are there any plans to address the potential increase in noise pollution and disturbances from the Proposed Project's activities?	In relation to aircraft noise, please refer to FAQ-NOI-1, above. As discussed in Section 3.11, Noise, of the EIR, increases to roadway traffic noise and noise attributed to Proposed Project ground operations (e.g., building HVAC) would be less than significant.	
FAQ-NOI-3	Are there any plans to implement noise mitigation strategies for affected communities?	As discussed in Section 3.11, Noise, of the EIR, noise impacts from the Proposed Project's construction would be less than significant with incorporation of MM-NOI-1 (Construction Worker Hearing Protection). Ground operations, both on-site and roadway, would be less than significant. The Proposed Project's aircraft operational noise increases may exceed the applicable noise increase thresholds for noise-sensitive receptors located in the vicinity of the southwest portion of the Markham Street and Brennan Avenue intersection. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e., acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult. The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete participation in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review would be required as	

Table II.5-14. Noise FAQ Responses

Identifier	Question	Response
		part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation.
		In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Operation of the air cargo center would be similarly reduced. The number of trips would be reduced by approximately 30%, as would annual flight operations, resulting in the total annual cargo aircraft operations of 7,488 flights. Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. MM-NOI-1 and MM-NOI-2 would be implemented under Alternative 6 and noise impacts would be less than significant with mitigation incorporated. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR
FAQ-NOI-4	Are there any plans to mitigate noise impacts on nearby residential areas during construction and operation?	Please refer to FAQ-NOI-3, above.
FAQ-NOI-5	Are there any provisions for providing hearing protection to workers exposed to excessive noise during construction?	MM-NOI-1 (Construction Worker Hearing Protection) requires contractors to provide employees with personal protective equipment as required by 8 CCR, Section 5096, along with educational materials regarding hearing protection.
FAQ-NOI-6	Has the report thoroughly assessed the potential noise pollution from the Proposed Project on nearby residential areas?	Please refer to FAQ-NOI-3, above.
FAQ-NOI-7	How will the Proposed Project affect the overall noise levels in the area?	Please refer to FAQ-NOI-3, above.
FAQ-NOI-8	How will the Proposed Project comply with the	As discussed in Section 3.11, Noise, of the EIR, construction of the Proposed Project would be required to meet CALGreen, Title 24, Part 11 standards. Specifically, the interior office areas and public-serving

Table II.5-14. Noise FAQ Responses

Identifier	Question	Response
	California Building Code requirements for interior environmental comfort regarding noise levels?	areas would need to meet the acoustical control provisions of CALGreen Section 5.507, which sets interior background sound level thresholds for occupied non-residential spaces and requires acoustical studies be performed. The areas of the proposed building handling air cargo and aircraft related activities would not be subject to these provisions, because these activities would not likely be affected by exterior noise. Standard construction practices for commercial buildings are typically capable of achieving an exterior-to-interior attenuation of approximately 20–25 dB. Since the proposed air cargo building would be located within the 65–70 dBA CNEL noise contour for March ARB, it would need to achieve greater than 25 dB exterior-to-interior noise reduction to comply with an interior sound level of 50 dBA 1-hour Leq per CALGreen Section 5.507.4.2. MIPAA would review and approve the plans and specifications of the Proposed Project to ensure compliance with the provisions of CALGreen.
FAQ-NOI-9	How will the Proposed Project ensure that noise levels are within acceptable limits for nearby land uses?	Please refer to FAQ-NOI-3, above. As discussed in Section 3.11, Noise, of the EIR, even with application of feasible mitigation, residences southwest of the Markham Street and Brennan Avenue intersection would be exposed to significant and unavoidable noise impacts.
FAQ-NOI-10	How will the Proposed Project impact the overall noise levels in the region?	Please refer to FAQ-NOI-3, above.
FAQ-NOI-11	What measures are in place to address potential sleep disturbances from airport operations?	As discussed in Section 3.11, Noise, of the EIR, March JPA has added a threshold of significance related to sleep disturbance: Would the Proposed Project result in aircraft operations (i.e., aircraft landings and/or takeoffs) at the March Inland Port Airport between 10:00 p.m. and 6:59 a.m. that could expose people within the March Inland Port Airport's vicinity to a significant risk of sleep disturbance due to noise? Because the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.), there would be no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. Therefore, there is no need to evaluate sleep disturbance under March JPA's threshold.
FAQ-NOI-12	What measures will be taken to reduce noise intrusions upon indoor activities within the project site?	Please refer to FAQ-NOI-8, above.
FAQ-NOI-13	What specific goals and policies from the Local March Joint Powers Authority General Plan are	Section 3.10, Land Use and Planning, and Table 3.10-1 of the EIR demonstrate how the Proposed Project is consistent with the applicable goals and policies of the March JPA General Plan related to GHG emissions, noise, and air quality. These include, but are not limited to, Noise/Air Quality Element Goal 1 (Ensure that land uses are protected

Table II.5-14. Noise FAQ Responses

Identifier	Question	Response
	being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	from excessive and unwanted noise), 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), and Goal 4 (Pursue reduced emissions for stationary and mobile sources through the use and implementation of new and advancing technologies) and Environmental Justice Element Policy 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 GHG emissions to avoid or minimize creating adverse conditions for adjacent communities). As discussed in Table 3.10-1, the Proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Where appropriate, mitigation measures are included to reduce and/or avoid potential conflicts with applicable goals adopted for the purpose of avoiding or mitigating GHG, noise, and air quality impacts, including MM-NOI-1 (Construction Worker Hearing Protection) and MM-NOI-2 (Future Tenant Aircraft Fleet), MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), MM-AQ-1 (Construction Management Plan) through MM-AQ-6 (Additional Air Quality Tenant Requirements), and MM-GHG-1 (Installation of EV Charging Stations).
FAQ-NOI-14	What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential hazards?	Please refer to FAQ-NOI-3, above.
FAQ-NOI-15	Are there any plans to address the potential increase in light and noise pollution from the Proposed Project's operations?	Please refer to FAQ-AES-1, FAQ-AES-3 and FAQ-NOI-3, above.
FAQ-NOI-16	What measures are in place to mitigate the potential increase in air and noise pollution from the Proposed Project's operations?	Please refer to FAQ-AQ-19 and FAQ-NOI-3, above.
FAQ-NOI-17	What measures are in place to protect vulnerable populations, such as children and the	Please refer to FAQ-NOI-3, above.

Table II.5-14. Noise FAQ Responses

lde	entifier	Question	Response
		elderly, from the	
		Proposed Project's	
		negative impacts?	

Table II.5-15. Population and Housing FAQ Responses

Identifier	Question	Response
FAQ-POP-1	Are there any plans to address the potential displacement of low-income families and vulnerable populations due to the Proposed Project?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not displace existing people or housing because the project site is primarily vacant and undeveloped and does not contain existing housing. Construction of replacement housing would not be necessary as a result of the Proposed Project. The project site is surrounded by industrial warehouse uses to the south and east and is partially on and partially adjacent to March ARB to the north and west, which includes military uses and an active airfield. Immediately north of the project site is the March ARB Fire Department. As such, no impact would occur.
FAQ-POP-2	Are there any plans to address the potential displacement of low-income residents and vulnerable communities caused by the Proposed Project?	Please refer to FAQ-POP-1, above.
FAQ-POP-3	Are there any plans to mitigate the Proposed Project's impact on local businesses?	The primarily undeveloped project site is surrounded by industrial warehouse uses to the south and east and is partially on and partially adjacent to March ARB to the north and west, which includes military uses and an active airfield. Immediately north of the project site is the March ARB Fire Department. As discussed in Section 3.12, Transportation, of the EIR, MM-TRA-1 (Construction Traffic Management Plan) includes coordination with adjacent or affected businesses and/or properties and emergency service providers to ensure that adequate access exists to the project site and neighboring sites. MM-TRA-2 (Project Truck Route on Heacock Street) requires all Proposed Project truck traffic utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes south of the project site. The intersection improvements at Heacock Street would include installed signage directing trucks to the Harley Knox Boulevard interchange. Under PDF-TRA-1, the Proposed Project would pay its fair share to address operational deficiencies at off-site intersections as set forth in the Proposed Project Traffic Analysis (Appendix M-1 of the EIR). Once constructed, operation of the Proposed Project is anticipated to generate approximately 150 permanent employees, who would likely come from the existing residential population in the greater Riverside County area and patronize local businesses.

Table II.5-15. Population and Housing FAQ Responses

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Identifier	Question	Response
FAQ-POP-4	Has the Proposed Project considered the potential displacement of residents or businesses?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not displace existing residents or businesses because the project site is primarily vacant and undeveloped and does not contain existing housing or businesses. The project site is surrounded by industrial warehouse uses to the south and east and is partially on and partially adjacent to March ARB to the north and west, which includes military uses and an active airfield. Immediately north of the project site is the March ARB Fire Department. As such, no impact would occur.
FAQ-POP-5	How will the Proposed Project impact the availability of affordable housing and rental properties for residents?	As identified in Chapter 2, Project Description, of the EIR, one of the primary objectives of the Proposed Project is to "provide increased job opportunities for local residents through the provision of employment-generating businesses." The Proposed Project would provide more local jobs to achieve a more favorable jobs/housing balance and providing annual economic contributions to the Riverside County region. As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project's anticipated approximate 150 permanent employees would likely come from the existing residential population in the greater Riverside County area. Therefore, the Proposed Project would not impact the availability of affordable housing and rental properties for residents.
FAQ-POP-6	How will the Proposed Project impact the availability of affordable housing and rental properties in the region?	Please refer to FAQ-POP-5, above.
FAQ-POP-7	How will the Proposed Project impact the availability of affordable housing in the area?	Please refer to FAQ-POP-5, above.
FAQ-POP-8	How will the Proposed Project impact the availability of affordable housing in the region?	Please refer to FAQ-POP-5, above.
FAQ-POP-9	How will the Proposed Project impact the local economy and job market?	As identified in Chapter 2, Project Description, of the EIR, one of the primary objectives of the Proposed Project is to "provide increased job opportunities for local residents through the provision of employment-generating businesses." The Proposed Project would provide more local jobs to achieve a more favorable jobs/housing balance and provide annual economic contributions to the Riverside County region. As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project's anticipated approximate 150 permanent employees would likely come from the existing residential population from the greater Riverside County area.

Table II.5-15. Population and Housing FAQ Responses

Identifier	Question	Response
FAQ-POP-10	How will the Proposed Project impact the local economy, including job creation and economic growth?	Please refer to FAQ-POP-9, above.
FAQ-POP-11	How will the Proposed Project impact the local economy, including job creation and income generation?	Please refer to FAQ-POP-9, above.
FAQ-POP-12	How will the Proposed Project impact the local job market and employment opportunities for residents?	Please refer to FAQ-POP-9, above.

Table II.5-16. Process FAQ Responses

Identifier	Question	Response
FAQ-PROCESS-1	Are there any plans to ensure regulatory compliance throughout the Proposed Project's lifecycle?	The MMRP identifies the enforcement agency(ies) for each project design feature and mitigation measure included in the EIR. In addition, the MMRP identifies the Proposed Project phase when the monitoring/reporting would occur, as well as the method of the monitoring/reporting.
FAQ-PROCESS-2	Are there any plans to establish a community advisory board for ongoing environmental oversight?	The Proposed Project does not include plans for a community advisory board. Creation of a community advisory board is outside the scope of CEQA.
FAQ-PROCESS-3	Are there any plans to monitor and evaluate the Proposed Project's environmental performance over time?	Please refer to FAQ-PROCESS-1, above.
FAQ-PROCESS-4	Has the Proposed Project obtained all necessary permits and approvals for construction and operation?	Necessary permits and approvals for construction and operation are obtained after certification of the Final EIR. Refer to EIR Chapter 2, Project Description, Section 2.6.2, Other Discretionary Approvals, Table 2-4 for a list of additional permits, approvals, and discretionary actions that would be necessary to implement the Proposed Project.
FAQ-PROCESS-5	How will the Proposed Project address any potential conflicts with existing environmental regulations and guidelines?	Regulatory oversight for specific resources is maintained at the federal, state, and local levels. Applicable laws, regulations, and standards are included in resource subsection within Chapter 3,

Table II.5-16. Process FAQ Responses

Identifier	Question	Response
		Environmental Analysis, of the EIR. The MMRP identifies the enforcement agency(ies) for each project design feature and mitigation measure included in the EIR. In addition, the MMRP identifies the Proposed Project phase when the monitoring/reporting would occur, as well as the method of the monitoring/reporting.
FAQ-PROCESS-6	How will the Proposed Project ensure compliance with all relevant environmental regulations throughout the Proposed Project's lifespan?	Please refer to FAQ-PROCESS-5, above.
FAQ-PROCESS-7	How will the Proposed Project comply with local, state, and federal environmental regulations?	Please refer to FAQ-PROCESS-5, above.
FAQ-PROCESS-8	How will the Proposed Project engage with stakeholders and the public to address environmental concerns?	March JPA/MIPAA and the applicant have actively conducted outreach efforts with stakeholders and the public over the last 3 years to address environmental concerns. The NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. During the 30-day public review period of the NOP, March JPA held a Scoping Meeting on April 14, 2021, to gather additional public input on the Proposed Project. The Draft EIR was distributed for a 45-day public review period from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days. The applicant held community meetings on June 18, 2024, July 1, 2024 and September 24, 2025. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
FAQ-PROCESS-9	What measures are in place to address potential regulatory violations during the Proposed Project?	Please refer to FAQ-PROCESS-5, above.
FAQ-PROCESS-10	What measures are in place to ensure the Proposed Project complies with all relevant	Please refer to FAQ-PROCESS-5, above.

Table II.5-16. Process FAQ Responses

Identifier	Question	Response
	environmental regulations and standards?	
FAQ-PROCESS-11	What measures are in place to ensure the Proposed Project's compliance with all relevant environmental regulations and guidelines?	Please refer to FAQ-PROCESS-5, above.
FAQ-PROCESS-12	What measures are in place to ensure transparency and accountability in environmental reporting?	Please refer to FAQ-PROCESS-5, above.
FAQ-PROCESS-13	What measures are in place to promote environmental education and awareness in the community?	Please refer to FAQ-PROCESS-8, above.

Table II.5-17. Public Services FAQ Responses

Identifier	Question	Response
FAQ-PUB-1	Has the Proposed Project considered the potential increase in demand for public services?	As analyzed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not result in the need for new or altered fire protection and/or police facilities to maintain acceptable service ratios, response times, or other performance objectives. Additionally, the Proposed Project would not generate substantial population growth, and there would be no need to construct new or altered schools, parks, libraries, or other public facilities to maintain performance objectives.
FAQ-PUB-2	What measures are in place to address potential emergency response challenges?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would comply with the March JPA General Plan Disaster Preparedness and Recovery Plan programs. The proposed site plan, including the access roadway, would be reviewed and approved by MIPAA, RCFD, and RCSD during plan review to ensure that emergency access would be provided at all times. Under MM-TRA-1 (Construction Traffic Management Plan), the Construction Traffic Management Plan would be developed in coordination with emergency service providers to ensure that adequate access exists to the project site and neighboring sites.
FAQ-PUB-3	How will the Proposed Project impact the local schools and educational facilities?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, operation of the Proposed Project would generate approximately 150 jobs, which would likely be filled by the existing residential population from the greater Riverside County area. Therefore, the Proposed Project would not generate substantial population growth, and there would be no need to construct new or altered schools or other educational facilities to maintain performance objectives.
FAQ-PUB-4	What measures are in place to address potential emergency response needs for the community?	Please refer to FAQ-PUB-2, above.

Table II.5-17. Public Services FAQ Responses

Identifier	Question	Response
FAQ-PUB-5	How will the Proposed Project address any unforeseen environmental challenges or emergencies?	Please refer to FAQ-PUB-2, above.
FAQ-PUB-6	Are there any plans to address the potential strain on public services and utilities caused by the Proposed Project?	With regard to public services, please refer to FAQ-PUB-1, above. As analyzed in Section 3.14, Utilities and Service Systems, of the EIR, the Proposed Project would have less-than-significant impacts to utilities and service systems.
FAQ-PUB-7	Has the report considered the impact of the Proposed Project on nearby schools, hospitals, and other essential services?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not generate substantial population growth, and there would be no need to construct new or altered schools, hospitals, or other essential services.
FAQ-PUB-8	Has the Proposed Project considered the potential impact on healthcare services in the area?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, operation of the Proposed Project would generate approximately 150 jobs, which would likely be filled by the existing residential population from the greater Riverside County area. Therefore, the Proposed Project would not stimulate population growth or a population concentration above what is assumed in local and regional land use plans or in projections made by regional planning authorities. As such, the Proposed Project would not generate substantial population growth, and there would be no need to construct new or altered public facilities, including healthcare services.
FAQ-PUB-9	How will the Proposed Project impact the overall community health and safety in the region?	The Proposed Project is sited in a location that would not result in a localized impact to sensitive receptors located in housing, schools, childcare facilities, and hospitals. The nearest sensitive receptor is approximately 0.5 miles east of the project site. As demonstrated in Section 3.2, Air Quality, of the EIR, based on construction and operational LST (NO ₂ , CO, PM ₁₀ , and PM _{2.5}) analyses and the CO hot spot assessment, the Proposed Project is not anticipated to result in localized criteria pollutant impacts.
		The Proposed Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
		As discussed in Section 3.2, Air Quality, and Section 3.7, Greenhouse Gas Emissions, of the EIR, the Proposed Project includes MM-AQ-1

Table II.5-17. Public Services FAQ Responses

Identifier	Question	Response
		through MM-AQ-6 (Additional Air Quality Tenant Requirements) which, in addition to reducing criteria air pollutants, have the co-benefit of reducing GHG emissions. In addition, MM-GHG-1 (Installation of EV Charging Stations) requires the Proposed Project plans to include circuitry, capacity, and equipment for EV charging in accordance with Tier 2 of the 2022 CALGreen Code, which will serve to reduce the Proposed Project's GHG emissions.
		As identified in Section 3.8, Hazards and Hazardous Materials, of the EIR, the Proposed Project would have less-than-significant impacts related to hazards and hazardous materials with the incorporation of MM-HAZ-1 (Hazardous Materials Contingency Plan), which requires the approval of a Hazardous Materials Contingency Plan prior to the issuance of a grading permit; MM-HAZ-2 (Stop Work, Groundwater Management), which requires stop work orders and groundwater management relating to the existing soil vapor extraction system, and MM-HAZ-3 (Wildlife Protective Measures), which requires that the Proposed Project incorporate recommendations included in the Wildlife Hazard Review (Appendix J-3 of the EIR) for the Proposed Project.
		The Proposed Project-specific WQMP (Appendix K-2 of the EIR) describes and illustrates how the Proposed Project would comply with the Riverside County MS4 Permit requirements. Source control and operational BMPs have been incorporated into the project design, including site design BMPs, source control BMPs, treatment control BMPs, and operation and maintenance requirements. In addition, MM-HYD-1 (Water Quality BMPs) will be implemented to reduce impacts on water quality. MM-AQ-6 requires that the tenant sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants.
		The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement of the affected residences in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights

Table II.5-17. Public Services FAQ Responses

Identifier	Question	Response
		between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
		MM-TRA-1 (Construction Traffic Management Plan) requires the development of a plan to ensure construction traffic would have less-than-significant impacts to transportation facilities. The Proposed Project would construct a traffic signal at the intersection of Heacock Street and the existing access roadway and, as required by MM-TRA-2 (Project Truck Route on Heacock Street), Proposed Project truck traffic would utilize the truck routes south of the project site.
		The EIR includes numerous mitigation measures that will lessen impacts and protect the public, including MM-AQ-1 through MM-AQ-6, MM-GHG-1, MM-HAZ-1 through MM-HAZ-3, MM-HYD-1, MM-NOI-1 (Construction Worker Hearing Protection), MM-NOI-2, MM-TRA-1, and MM-TRA-2.

Table II.5-18. Recreation FAQ Responses

Identifier	Question	Response
FAQ-REC-1	Are there any plans to address the potential loss of green spaces and recreational areas caused by the Proposed Project?	The project site includes a groundwater monitoring well, a former fire house, paved taxiway and tarmac areas associated with aviation uses, and various paved improvements located next to the existing taxiway. The remainder of the site is vacant and undeveloped land that is routinely mowed to reduce wildlife attractants, given the site's proximity to March ARB. The March JPA General Plan does not designate the project site or adjacent properties as open space areas. The project site is not a green space or recreational area. Therefore, the Proposed Project would not involve the loss of any green space or recreational areas.
FAQ-REC-2	Are there any plans to mitigate the Proposed Project's impact on nearby recreational areas?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would generate approximately 150 jobs, which it is assumed would be filled by the existing residential population from the greater Riverside County area. Because implementation of the Proposed Project would not result in population growth or new housing, there would be minimal to no increase in the use of existing parks and recreational facilities. Further, as shown in Figure 3.11-11 and Figure 3.11-12 of the EIR, no existing parks would be located within the Proposed Project's aircraft operational noise contour; therefore, no parks would be subjected to increased aircraft noise disturbance above baseline conditions.
FAQ-REC-3	Has the report considered the impact of the Proposed Project on local recreational areas and	As discussed in Section 3.11, Noise, of the EIR and shown in Figure 3.11-11 and Figure 3.11-12, no existing parks would be located within the Proposed Project's aircraft operational noise contour; therefore, no parks would be subjected to increased aircraft noise disturbance above baseline conditions.

Table II.5-18. Recreation FAQ Responses

Identifier	Question	Response
	outdoor recreational opportunities?	
FAQ-REC-4	How will the Proposed Project impact the availability of green spaces and recreational areas in the community?	Please refer to FAQ-REC-1, above.
FAQ-REC-5	How will the Proposed Project impact the availability of public parks and open spaces for the community?	Please refer to FAQ-REC-1, above.

Table II.5-19. Transportation FAQ Responses

Identifier	Question	Response
FAQ-TRA-1	Are there any plans to address the potential increase in traffic accidents and road safety issues resulting from the Proposed Project?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, regional access to the project site is provided via I-215, with local access provided via Heacock Street. The proposed vehicular access point and circulation outside and inside the site, including the Proposed Project's parking lot, would be reviewed and approved by MIPAA. The Proposed Project would not include any non-standard design features, nor would it have any hazardous elements. Impacts would be less than significant.
FAQ-TRA-2	Are there any plans to enhance public transit options to reduce reliance on cars?	Under MM-AQ-5 (Commute Trip Reduction), any tenant agreement is required to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
FAQ-TRA-3	Are there any plans to improve public transportation access to the project site?	As discussed in Section 3.12, Transportation, of the EIR, there are currently no existing bus routes that serve the roadways close to the project site. In its comment letter dated May 31, 2024, the Riverside Transit Agency had no comments on the Proposed Project.
FAQ-TRA-4	Are there any plans to improve transportation infrastructure to alleviate traffic issues?	The Proposed Project Traffic Analysis (Appendix M-1 of the EIR) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. To address operational deficiencies at off-site intersections, PDF-TRA-1 requires the Proposed Project contribute its fair share towards improvement measures provided in Table 1-5 of Appendix M-1. Although project design features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the MMRP. MIPAA will monitor compliance through the MMRP.

Table II.5-19. Transportation FAQ Responses

Identifier	Question	Response
FAQ-TRA-5	Has the Proposed Project considered the potential increase in accidents due to increased traffic?	Please refer to FAQ-TRA-1, above.
FAQ-TRA-6	Has the Proposed Project considered the potential increase in accidents from congested roadways?	Please refer to FAQ-TRA-1, above.
FAQ-TRA-7	Has the Proposed Project considered the potential strain on public transportation services?	Please refer to FAQ-TRA-3, above.
FAQ-TRA-8	Has the report considered the impact of the Proposed Project on local traffic patterns and congestion in the area?	Please refer to FAQ-TRA-4, above.
FAQ-TRA-9	How will the Proposed Project address the potential safety hazards posed by the expansion and modification of the existing southern access roadway?	Section 3.8, Hazards and Hazardous Materials, of the EIR discloses existing contamination within the project site, including the southern access roadway. As part of construction of the Proposed Project, expansion of the existing access roadway to the south of the project site would slightly overlap with Site 7; however, it would avoid the burn areas within Site 7. Site 7 has documented soil, soil gas, and groundwater contamination and is currently under a deed restriction and Environmental Restrictive Covenants, which require notification of EPA and DTSC for specific activities at the project site. The Restrictive Covenants are enforceable by the State of California, U.S. Department of Air Force, and EPA. Additionally, the HCMP required by MM-HAZ-1 (Hazardous Materials Contingency Plan) would be submitted to EPA and DTSC for review/approval prior to the start of construction for review of the protective measures during work within Site 7.
FAQ-TRA-10	How will the Proposed Project impact local traffic patterns and congestion?	Please refer to FAQ-TRA-4, above.
FAQ-TRA-11	How will the Proposed Project impact the availability of public transportation and infrastructure in the region?	Please refer to FAQ-TRA-3, above.

Table II.5-19. Transportation FAQ Responses

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Identifier	Question	Response
FAQ-TRA-12	How will the Proposed Project impact the overall public transportation system in the region?	Please refer to FAQ-TRA-3, above.
FAQ-TRA-13	How will the Proposed Project impact the overall traffic congestion in the region?	Please refer to FAQ-TRA-4, above.
FAQ-TRA-14	What measures are in place to address potential accessibility issues for public transit users?	Please refer to FAQ-TRA-3, above.
FAQ-TRA-15	What measures are in place to address potential traffic management challenges?	Please refer to FAQ-TRA-4, above.
FAQ-TRA-16	What measures are in place to ensure the safety of pedestrians and cyclists in the area?	As discussed under Threshold TRA-1 in Section 3.12, Transportation, of the EIR, there is nominal pedestrian and bicycle traffic in the vicinity of the project site. MM-TRA-1 (Construction Traffic Management Plan) requires the development of a plan to ensure construction traffic would have less-than-significant impacts to bicycle and pedestrian facilities. The Proposed Project would construct a traffic signal at the intersection of Heacock Street and the existing access roadway and, as required by MM-TRA-2 (Project Truck Route on Heacock Street), Proposed Project truck traffic would utilize the truck routes south of the project site. These measures would ensure the safety of pedestrians and cyclists in the area.
FAQ-TRA-17	What measures are in place to mitigate the impact of increased traffic congestion in the surrounding area?	Please refer to FAQ-TRA-4, above.
FAQ-TRA-18	How will the Proposed Project impact the local infrastructure, including roads, bridges, and utilities?	Regarding transportation infrastructure, refer to FAQ-TRA-4, above. Regarding utilities, as discussed in Section 3.14, Utilities and Service Systems, of the EIR, the Proposed Project would not require relocation or construction of new or expanded water, wastewater, stormwater, electrical, telecommunications, or natural gas facilities that would cause a significant impact. Therefore, impacts would be less than significant.

Table II.5-20. Utilities and Service Systems FAQ Responses

Identifier	Question	Response
FAQ-UTL-1	Are there any plans to address the potential increase in waste generation and landfill	As discussed in Section 3.14, Utilities and Service Systems, of the EIR, the permitted capacities of the landfills serving the Proposed Project are currently sufficient to handle the Proposed Project's waste (approximately 143 tons per year).
	usage resulting from the Proposed Project?	The Proposed Project would submit a waste recycling plan to RCDWR for approval prior to issuance of building permits for the site. The waste recycling plan would identify and estimate the non-hazardous materials to be recycled during construction and demolition activities and would specify where and how the recyclable materials would be stored on the project site. The Proposed Project would then submit a waste recycling report, demonstrating that a minimum of 50% of the Proposed Project's construction and demolition waste was recycled, to RCDWR for approval prior to issuance of occupancy permits.
		The minor amount of waste generated in comparison to available landfill capacities, combined with compliance with state and local statutes and regulations related to solid waste, would ensure that construction and operation of the Proposed Project would have a less-than-significant impact with respect to solid waste.
FAQ-UTL-2	Are there any plans to address the potential increase in waste generation resulting from the Proposed Project?	Please refer to FAQ-UTL-1, above.
FAQ-UTL-3	What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	As discussed in Section 3.14, Utilities and Service Systems, of the EIR, specifically Threshold UTL-2, the Proposed Project would add a daily water demand of 27.9 gpm, which is equivalent to 45 acre-feet per year. Water for the Proposed Project would be provided by WMWD. Water demand from the Proposed Project would consist of potable water supplies for use at sanitary facilities by employees and visitors to the site, water used for cleaning ground support and maintenance equipment via a portable wash rack located inside of the proposed cargo building, and water used as needed for activities such as cleaning the inside of facilities. Airplane washing would not occur on the project site. The water demand of the Proposed Project is expected to be typical of aviation support uses, for which the site is designated under the March JPA General Plan. In addition, WMWD would provide water supplies sufficient for a 4,000 gpm, 4-hour fire flow requirement.
		The Proposed Project would be required to comply with all applicable water conservation measures, including the requirements of CALGreen and March JPA's Water Efficient Landscape Ordinance. Implementation of these water conservation measures would contribute to fulling the goals of the state Water Conservation Act of 2009 (Senate Bill X7-7), which requires the state to reduce urban water consumption by 20% by the year 2020.
FAQ-UTL-4	What measures are in place to address	As discussed in Section 3.14, Utilities and Service Systems, of the EIR, the Proposed Project would not require relocation or construction of new or expanded water, wastewater, stormwater, electrical,

Table II.5-20. Utilities and Service Systems FAQ Responses

Identifier	Question	Response	
	potential strain on local infrastructure?	telecommunications, or natural gas facilities that would cause a significant impact. Therefore, impacts would be less than significant.	
FAQ-UTL-5	What measures are in place to address potential water scarcity concerns in the area?	As discussed in Section 3.14, Utilities and Service Systems, of the EIR, specifically Threshold UTL-2, the Proposed Project would add a daily water demand of 27.9 gpm, which is equivalent to 45 acre-feet per year. Water for the Proposed Project would be provided by WMWD. In addition, WMWD would provide water supplies sufficient for a 4,000 gpm, 4-hour fire flow requirement.	
		As illustrated in Figure 2, MARB Water Master Plan Land Use, of the MARB Water Master Plan (Appendix N-2 of the EIR), the project site has been designated as Global Port/MJPA, which is consistent with the Proposed Project. Because the water demand of the Proposed Project would be characteristic of the land use type for which it is designated under the March JPA General Plan and the MARB Water Master Plan, the water supply needs of the Proposed Project are incorporated into the water supply planning evaluations of the WMWD and Metropolitan 2020 UWMPs. Both the WMWD UWMP and the Metropolitan UWMP indicate that sufficient water supplies are available to meet expected demand for customers and member agencies from 2020 through 2045 under normal, single-dry-year, and multiple-dry-year conditions. In addition, WMWD has provided a will serve letter clarifying that WMWD has sufficient capacity to supply water for the Proposed Project (Appendix N-4 of the EIR). As a result, WMWD would have sufficient water supplies available to serve the Proposed Project and reasonably foreseeable future development during normal, single-dry, and multiple-dry years. Impacts would be less than significant.	
FAQ-UTL-6	What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid waste diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or after 2020 and annually thereafter?	Please refer to FAQ-UTL-1, above.	
FAQ-UTL-7	How will the Proposed Project impact the local infrastructure, including roads, bridges, and utilities?	Regarding utilities, as discussed in Section 3.14, Utilities and Service Systems, of the EIR, the Proposed Project would not require relocation or construction of new or expanded water, wastewater, stormwater, electrical, telecommunications, or natural gas facilities that would cause a significant impact. Therefore, impacts would be less than significant.	

Table II.5-20. Utilities and Service Systems FAQ Responses

Identifier	Question	Response	
		The Proposed Project Traffic Analysis (Appendix M-1 of the EIR) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. To address operational deficiencies at off-site intersections, PDF-TRA-1 requires the Proposed Project contribute its fair share towards improvement measures provided in Table 1-5 of Appendix M-1. Although project design features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the MMRP. MIPAA will monitor compliance through the MMRP.	
FAQ-UTL-8	Q-UTL-8 Are there any plans to address the potential strain on public services and utilities caused by the Proposed Project?	Regarding utilities, as analyzed in Section 3.14, Utilities and Service Systems, of the EIR, the Proposed Project would have less-than-significant impacts to utilities and service systems.	
		With regards to public services, as analyzed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not result in the need for new or altered fire protection and/or police facilities to maintain acceptable service ratios, response times, or other performance objectives. Additionally, the Proposed Project would not generate substantial population growth, and there would be no need to construct new or altered schools, parks, libraries, or other public facilities to maintain performance objectives.	

Table II.5-21. Wildfire FAQ Responses

Identifier	Question	Response
FAQ-FIRE-1	Has the report thoroughly assessed the risk of wildfires in the area due to the Proposed Project?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the project site is not located in or near a VHFHSZ. According to the April 2024 CAL FIRE FHSZ maps, the project site is over 2 miles away from the nearest HFHSZ. Further, the Proposed Project would not require the installation or maintenance of new infrastructure such as roadways, fuel breaks, emergency water sources, power lines, or other utilities that may result in temporary or ongoing impacts to the environment. The Proposed Project would not exacerbate wildfire risks.
FAQ-FIRE-2	How will the Proposed Project address any unforeseen environmental challenges or emergencies?	As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would comply with the March JPA General Plan Disaster Preparedness and Recovery Plan programs. The proposed site plan, including the access roadway, would be reviewed and approved by MIPAA, RCFD, and RCSD during plan review to ensure that emergency access would be provided at all times. Under MM-TRA-1 (Construction Traffic Management Plan), the Construction Traffic Management Plan would be developed in coordination with emergency service providers to ensure that adequate access exists to the project site and neighboring sites.

Table II.5-22. Cumulative FAQ Responses

Identifier	Question	Response
FAQ-CUMUL-1	Has the Proposed Project considered the cumulative impact of other nearby developments?	Aesthetics: As discussed in Section 3.1, Aesthetics, of the EIR, the cumulative study area for lighting and glare impacts includes the areas in the immediate vicinity of the project site and off-site roadways that could experience light spillover and glare effects. All lighting proposed for the Proposed Project would be subject to compliance with the provisions of the March JPA Development Code, which would ensure proper design, installation, and operation of all exterior lighting, thereby reducing the potential for glare effects and light spillover onto adjacent properties. Other projects within the aesthetics cumulative project area would be required to comply with existing regulations pertaining to light and glare, and any project occurring within March ARB would be required to comply with applicable FAA regulations pertaining to light and glare. Additionally, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Therefore, the Proposed Project's contribution to a cumulative light and glare impact would be less than significant.
		Agriculture and Forestry Resources: As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the implementation of the Proposed Project would not result in any impacts to ongoing agricultural operations or the conversion of farmland to non-agricultural use. The Proposed Project would therefore not contribute to cumulative impacts to agriculture.
		Air Quality: The EIR considered cumulative air quality effects of the Proposed Project in Section 3.2.7. 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 SCAQMD develops and implements plans for future attainment of ambient air quality standards. SCAQMD's CEQA Air Quality Significance Thresholds indicate 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.
		The Proposed Project is expected to exceed SCAQMD's mass daily emission-based thresholds for VOCs, NOx, and CO during operation, and the Proposed Project would have the potential to conflict with SCAQMD's 2022 AQMP. The Proposed Project therefore has the potential to result in a cumulatively considerable new increase of VOCs, NOx, and CO for which the region is in nonattainment under an applicable federal or state ambient air quality standard. As such, and as identified in Section 3.2.7 of the EIR, the Proposed Project would have a significant and unavoidable cumulative air quality impact.
		Biological Resources: Section 3.3, Biological Resources, of the EIR analyzes cumulative impacts to biological resources from development within the March JPA Planning Area and the surrounding area. With implementation of MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures) through MM-BIO-5 (Jurisdictional Waters

Table II.5-22. Cumulative FAQ Responses

Identifier	Question	Response
		Permitting and Regulatory Agency Permitting), cumulative impacts to special-status species and sensitive habitats would be reduced to less than significant.
		Cultural Resources/Tribal Cultural Resources: As discussed in Section 3.4, Cultural Resources, of the EIR, the Proposed Project would result in no impact on historical resources, and therefore no cumulatively considerable impacts to historical resources would occur. The Proposed Project would implement MM-CUL-1 (Archaeological Monitoring) through MM-CUL-5 (Phase IV Report) and MM-TCR-3 (Discovery of Human Remains), included in the Final EIR, which would reduce potentially significant impacts to archaeological resources to less-than-significant levels. As discussed in Section 3.4 of the EIR, cumulative projects listed in Table 3-1 have the potential to result in discovery of unknown or subsurface archaeological resources of unknown significance, similar to the Proposed Project. However, because the Proposed Project and other projects identified within the cumulative impact study area are primarily mitigated by the collection and curation of information and the preservation of the most important resources, adequate mitigation has occurred for in situ appreciation of and access to information regarding those sites for future generations. This reduces the potential for cumulative effects from implementing the Proposed Project improvements. Therefore, no cumulatively considerable impacts to archaeological resources would occur. Similarly, cumulative impacts to human remains would result from an aggregate of disturbance and loss of Native American remains. Each of the cumulative projects would be required to comply with applicable laws for the proper handling of human remains; therefore, a potentially significant cumulative impact would not occur. The Proposed Project is also subject to regulations addressing discovery of human remains and would implement MM-TCR-3, included in the Final EIR. Therefore, implementation of the Proposed Project, in addition to the related projects identified in Table 3-1, would not result in cumulatively considerable impacts to human remains.
		As discussed in Section 3.13, Tribal Cultural Resources, of the EIR, the Proposed Project would not result in significant impacts to TCRs with implementation of MM-TCR-1 (Tribal Monitoring) through MM-TCR-4 (Non-Disclosure), included in the Final EIR, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training); therefore, the Proposed Project would not result in or contribute to cumulative significant impacts to TCRs. Cumulative impacts would be less than significant with mitigation incorporated.
		Energy: Section 3.5, Energy, of the EIR evaluated the potential cumulative impact of other nearby developments. Cumulative projects that could combine with the Proposed Project's impacts, thereby exacerbating impacts in the cumulative study area, include any project that could result in wasteful, inefficient, or unnecessary use of energy. Future projects would be subject to CEQA and would require an energy analysis; consistency with existing plans and

Table II.5-22. Cumulative FAQ Responses

Identifier	Question	Response
		policies for renewable energy and energy efficiency; and implementation of control measures and mitigation, if necessary, to avoid wasteful, inefficient, or unnecessary consumption of energy resources. The Proposed Project would be designed to maximize energy performance, and over the lifetime of the Proposed Project, the fuel efficiency of the aircraft, employee vehicles and trucks are expected to increase. CARB's approach to passenger vehicles combines the control of smog-causing pollutants and GHG emissions into a single, coordinated package of standards. The approach also includes efforts to support and accelerate the number of plug-in hybrids and zero-emissions vehicles in California.
		Geology and Soils: As discussed in Section 3.6, Geology and Soils, of the EIR, as development occurs within the cumulative area, potential cumulative impacts on geology and soils (including paleontological resources) would result from projects that combine to create geologic hazards, including unstable geologic conditions. However, most geology and soil hazards associated with development, including liquefaction, landslides, and unstable soils, would be site specific and can be mitigated on a project-by-project basis. Each cumulative project would be required to adhere to building engineering design standards per the most recent version of the CBC to ensure the safety of building occupants and avoid a cumulative geologic hazard. Additionally, as needed, projects would incorporate individual mitigation or geotechnical requirements for site-specific geologic hazards or paleontological resources present on each individual cumulative project site. As a result, potential cumulative impacts related to site-specific geologic hazards, such as seismically induced ground failure, expansive soils, and soil collapse, as well as paleontological resources, would not occur. Therefore, the Proposed Project, in combination with other cumulative projects, would not contribute to a significant cumulative impact associated with geology and soils. As such, cumulative impacts would be less than significant.
		Greenhouse Gas Emissions: Section 3.7, Greenhouse Gas Emissions, and specifically, Section 3.7.7, Cumulative Effects, of the EIR restated that GHG emissions inherently contribute to cumulative impacts. Development of the project site would support SCAG's Connect SoCal by providing local jobs and incorporating energy efficiency, water conservation, and EV parking infrastructure and would demonstrate consistency with the Scoping Plan. Given the Proposed Project's consistency with statewide, regional, and local plans adopted for the purpose of reducing GHG emissions, the Proposed Project's emissions and their effects on climate change would not be cumulatively considerable. The Proposed Project would implement MM-AQ-2 (Construction Requirements) through MM-AQ-6 (Additional Air Quality Tenant Requirements) and MM-GHG-1 (Installation of EV Charging Stations) to further reduce the Proposed Project's GHG emissions. Hazards and Hazardous Materials: As discussed in Section 3.8,
		Hazards and Hazardous Materials, of the EIR, impacts associated

Table II.5-22. Cumulative FAQ Responses

Identifier	Question	Response
		with the Proposed Project are related to preexisting contamination due to historical activities. These impacts are not anticipated to be cumulative, as they would be controlled on the project site. Monitoring, handling, transporting, and disposing of hazardous materials is discussed in Section 3.8. An HMCP as described in MM-HAZ-1 (Hazardous Materials Contingency Plan) would reduce the risk of handling, transport, and disposal to less than significant. Impacts associated with hazardous materials are typically localized to the project site. Similar and nearby projects would also be required to adhere to federal, state, and local regulations that reduce the impacts of handling, transporting, and disposal of hazardous materials, as well as reduce the impacts due to potential upset or accident conditions that could occur, either from the Proposed Project or from nearby projects. As such, no cumulative impacts would occur.
		Hydrology and Water Quality: As discussed in Section 3.9, Hydrology and Water Quality, of the EIR, the geographic context for the analysis of cumulative impacts associated with water quality is the Santa Ana River Watershed. All cumulative development in the watersheds would be subject to the existing regulatory requirements to protect water quality and minimize increases in stormwater runoff. The Proposed Project's cumulative impacts to water quality would be less than significant.
		Land Use and Planning: As discussed in Section 3.10, Land Use and Planning, of the EIR, land use impacts tend to be localized in nature, and specific impacts are tied either directly or indirectly to the specific action. All cumulative projects would be subject to similar plan consistency criteria as the Proposed Project, which would ensure compliance with existing applicable land use plans with jurisdiction over the project area. Any cumulative projects that propose amendments to the general plan or zoning ordinance or require a specific plan would be required to show that proposed uses would be consistent with applicable policies. Cumulative projects that exist outside MIPAA's jurisdiction would be required to show consistency with relevant and applicable planning documents that govern each respective jurisdiction. Each jurisdiction would also be responsible for determining the appropriate public and infrastructure improvements required with the implementation of each project. Therefore, the Proposed Project, when viewed in context with the cumulative development proposals, is not expected to result in adverse cumulative land use impacts. In addition, future development would comply with applicable development standards to prevent land use conflicts. Therefore, the Proposed Project's land use and planning impacts would be less than cumulatively considerable with mitigation incorporated.
		Noise: Section 3.11, Noise, of the EIR evaluated the cumulative noise impacts of the Proposed Project and concluded that the Proposed Project would not contribute substantially to any cumulative traffic noise impact. With regard to aircraft noise, the replacement of the

Table II.5-22. Cumulative FAQ Responses

Identifier	Question	Response
		KC-135 aircraft with the KC-46A aircraft would lessen noise levels. However, given that the Proposed Project would potentially contribute a large majority of the acoustic energy associated with aviation activity at March ARB/Inland Port Airport, the Proposed Project would have the potential to result in a cumulatively considerable new increase of aviation noise levels that would be significant and unavoidable even with the implementation of mitigation measures.
		Population and Housing: As discussed in Chapter 4 of the EIR, the Proposed Project's anticipated approximately 150 permanent employees would likely come from the existing residential population from the greater Riverside County area. The estimated employee count for the Proposed Project (150) would be less than 0.05% of the total employment in SCAG's Growth Forecast under the adopted 2020–2045 RTP/SCS. The region is expected to see continued population growth, and the Proposed Project would not result in a substantial increase beyond SCAG's overall growth projections. SCAG projects the County would be slightly jobs-rich, with a 1.03:1 jobs-to-housing ratio in 2030. Additionally, SCAG projects the County would be slightly above balanced, with a 1.02:1 jobs-to-housing ratio in 2045. The cumulative growth induced by the Proposed Project combined with other approved and proposed projects is unlikely to result in substantial employment growth beyond that which is already planned for in the County and region.
		Public Services: As analyzed in Chapter 4 of the EIR, the Proposed Project would not generate substantial population growth, and there would be no need to construct new or altered public service facilities to maintain performance objectives. The Proposed Project's contribution, in combination with other nearby developments, would not be cumulatively considerable.
		Recreation: As discussed in Chapter 4 of the EIR, the Proposed Project would have less-than-significant effects on recreation. The Proposed Project's contribution, in combination with other nearby developments, would not be cumulatively considerable.
		Transportation: As discussed in Section 3.12, Transportation, of the EIR, the Proposed Project's VMT impact would not be cumulatively considerable per WRCOG guidance.
		Utilities and Service Systems: Section 3.14, Utilities and Service Systems, of the EIR provided a thorough discussion of the Proposed Project's cumulative effects, in conjunction with other relevant development, and determined the Proposed Project's impacts on utilities and service systems would not be cumulatively considerable.
		Wildfire: As analyzed in Chapter 4 of the EIR, the Proposed Project would not exacerbate wildfire risk. Project-related impacts are specific to the project site and would not contribute to (or be shared with in an additive sense) the impacts on other development sites. Each related development would be required to satisfy the policies and regulations within the California Fire Code and its respective jurisdiction's regulations to reduce impacts related to emergency

Table II.5-22. Cumulative FAQ Responses

Identifier	Question	Response
		access, fire flow, and proximity to wildfire zones. Similar to the Proposed Project, each of the related developments would be individually subject to either RCFD review or review by its own fire department and would be required to comply with all applicable construction-related and operational fire safety requirements of the RCFD or its own fire department in order to adequately reduce potential wildfire impacts. The Proposed Project's contribution, in combination with other nearby developments, would not be cumulatively considerable.

II.6 Responses to Individual Comments

Comment Letter	Individual Commenter Name	Date
I-1	Peg Bradley	June 19, 2024
I-2	Jennifer Becker	June 20, 2024
I-3	Holly Reeves	June 21, 2024
I-4	Karen Jakpor	July 1, 2024
I-5	Patty Huddleston	July 1, 2024
I-6	Peter Pettis	July 1, 2024
I-7	Peggy Walton	July 1, 2024
I-8	Michele Muehls	July 1, 2024
I-9	Kirk Wolf	July 1, 2024
I-10	Elaine Miller	July 1, 2024
I-11	Ira Long	July 1, 2024
I-12	Janice Oien	July 1, 2024
I-13	Jonathan Peaslee	July 1, 2024
I-14	Jennifer Guzman	July 1, 2024
I-15	John W. Hagmann	July 1, 2024
I-16	Jen Larratt-Smith	July 1, 2024
I-17	Gayle DeCarlantonio	July 1, 2024
I-18	Fera S. Momtaz	July 1, 2024
I-19	Eunhee Kim	July 1, 2024
I-20	Deb Whitney	July 1, 2024
I-21	Dennise Jimenez	July 1, 2024
I-22	Richard Stalder	July 1, 2024
I-23	Carolyn Rasmussen	July 1, 2024
I-24	Christine Martin	July 1, 2024
I-25	Candy Blokland	July 1, 2024
I-26	Brian Wardle	July 1, 2024
I-27	Betty Hao	July 1, 2024
I-28	Beverly Arias	July 1, 2024
I-29	Ann Marchand	July 1, 2024
I-30	Amber Peaslee	July 1, 2024
I-31	Jessica McDermott	July 1, 2024
I-32	Abby Banning	July 1, 2024
I-33	Aaron Bushong	July 1, 2024
I-34	John Viafora	July 1, 2024
I-35	Abdallah Karim	July 1, 2024
I-36	Joe Aklufi	July 1, 2024
I-37	Ajay Shah	July 1, 2024
I-38	Lenora Mitchell	July 1, 2024
I-39	K. Doty	July 1, 2024
I-40	Josie Sosa	July 1, 2024
I-41	Jade Sasser	July 1, 2024

Comment Letter	Individual Commenter Name	Date
I-42	Matt Silveous	July 1, 2024
I-43	Melissa Suarez	July 1, 2024
I-44	Mary Viafora	July 1, 2024
I-45	Nicole Bernas	July 1, 2024
I-46	Molly Nazeck	July 1, 2024
I-47	Milo J. Rivera	July 1, 2024
I-48	Steve Huddleston	July 1, 2024
I-49	Victoria Belova	July 1, 2024
I-50	Shaan Saigol	July 1, 2024
I-51	Sue Nipper	July 1, 2024
I-52	Suzanne Page	July 2, 2024
I-53	Tim Connacher	July 2, 2024
I-54	Maria Rodriguez	July 2, 2024
I-55	Laura Sandidge	July 2, 2024
I-56	Jade Sasser, PhD	July 2, 2024
I-57	Holly Wolf	July 2, 2024
I-58	Linda Tingley Rivera	July 2, 2024
I-59	Linlin Zhao	July 2, 2024
I-60	David Drexler	July 2, 2024
I-61	Christian Lytle, PhD; Susan Diethelm, MD; and Amy Lytle, BS	July 2, 2024
I-62	Ana Ramirez	July 2, 2024
I-63	Anthony Scimia Jr.	July 2, 2024
I-64	John Farnsworth	July 2, 2024
I-65	Corinne Perez	July 2, 2024
I-66	Steven Balmer	July 2, 2024
I-67	Peg Bradley	July 3, 2024
I-68	Steve and Patty Huddleston	July 3, 2024
I-69	Julie Weatherford	July 4, 2024
I-70	Candi Erwin	July 4, 2024
I-71	Mona Liu	July 6, 2024
I-72	Carlos Lliguin	July 6, 2024
I-73	George Harvilla	July 7, 2024
I-74	Frank and Michelle Erdodi	July 8, 2024
I-75	Jennifer Becker	July 8, 2024
I-76	Amy Litt	July 9, 2024
I-77	Teresa Alcala	July 9, 2024
I-78	Ole Becker	July 9, 2024
I-79	Loralee Larios	July 9, 2024
I-80	Jadie Lee	July 10, 2024
I-81	Matthew J. Bradley	July 14, 2024
I-82	Peggy Walton	July 15, 2024
I-83	Chris Bardeen	July 14, 2024
I-84	April Alvarado	July 17, 2024

Comment Letter	Individual Commenter Name	Date
I-85	Cesar Collazo	July 17, 2024
I-86	Edith Gingerich	July 17, 2024
I-87	Frances Sladek, PhD	July 17, 2024
I-88	Margarit Curras-Collazo	July 17, 2024
I-89	Leonard Mueller	July 18, 2024
I-90	Shannon Helmholtz	July 18, 2024
I-91	Tara and Mark Byerly	July 18, 2024
I-92	Ying Shen	July 18, 2024
I-93	Marita Schleicher	July 19, 2024
I-94	Bernd Schleicher	July 19, 2024
I-95	Jerry Shearer	July 19, 2024
I-96	Mike McCarthy	July 19, 2024
I-97	Elaine Miller	July 20, 2024
I-98	Michelle Calanchini	July 20, 2024
I-99	Catherine Barrett-Fischer	July 21, 2024
I-100	Clinton Clark	July 21, 2024
I-101	Clinton Clark	July 21, 2024
I-102	Cynthia Jessen	July 21, 2024
I-103	Deb Whitney	July 21, 2024
I-104	Eunhee Kim	July 21, 2024
I-105	Eddie Salazar	July 21, 2024
I-106	Franco Pacheco	July 21, 2024
I-107	Fernando Sosa Jr.	July 21, 2024
I-108	Gary Barnes	July 21, 2024
I-109	Mike and Kerrie Hudson	July 21, 2024
I-110	Gayle DiCarlantonio	July 21, 2024
I-111	Jennifer A. Diaz	July 21, 2024
I-112	Greg Morris	July 21, 2024
I-113	Joseph Aklufi	July 21, 2024
I-114	John Farnsworth	July 21, 2024
I-115	Kerry Hanson	July 21, 2024
I-116	Greg Renne	July 21, 2024
I-117	John N. Chizo	July 21, 2024
I-118	Jonathan Peaslee	July 21, 2024
I-119	Mark Jessen	July 21, 2024
I-120	Mark Lien	July 21, 2024
I-121	Scott Rose	July 21, 2024
I-122	Matt Silveous	July 21, 2024
I-123	Sharon Barnes	July 21, 2024
I-124	Sandi Cabrera	July 21, 2024
I-125	Shirley Ng	July 21, 2024
I-126	Josie Sosa	July 21, 2024
I-127	Michael Hampton	July 21, 2024

Comment Letter	Individual Commenter Name	Date
I-128	Maria Estabrooks	July 21, 2024
I-129	Michele Muehls	July 21, 2024
I-130	Veronica Juarez	July 21, 2024
I-131	William Landa	July 21, 2024
I-132	Shari Shelton-Geeson	July 22, 2024
I-133	William R. Clark	July 22, 2024
I-134	Yesenia Contreras	July 22, 2024
I-135	Melanie Murray	July 22, 2024
I-136	Michelle Gomez	July 22, 2024
I-137	Jarrod T. Favors Sr.	July 22, 2024
I-138	Chris Schulte	July 22, 2024
I-139	Jeannine Sabel	July 22, 2024
I-140	Jörn Ole Becker	July 22, 2024
I-141	Gale Schulte	July 22, 2024
I-142	Gurumantra Khalsa	July 22, 2024
I-143	Gary Ceasar	July 22, 2024
I-144	Gary Ceasar	July 22, 2024
I-145	Gary Ceasar	July 22, 2024
I-146	Frank and Michelle Erdodi	July 22, 2024
I-147	Amy C. Murillo, PhD	July 22, 2024
I-148	Annette Heying	July 22, 2024
I-149	Barbara Christie	July 22, 2024
I-150	Bill Clark	July 22, 2024
I-151	Corinne Perez	July 22, 2024
I-152	Cathy Zmudka	July 22, 2024
I-153	Cathy Zmudka	July 22, 2024
I-154	David Call	July 22, 2024
I-155	Diamond Favors	July 22, 2024
I-156	Don Schulte	July 22, 2024
I-157	Ira and Rajean Long	July 22, 2024
I-158	Jaylen Favors	July 22, 2024
I-159	Ira Long	July 22, 2024
I-160	Jennifer Becker	July 22, 2024
I-161	Janet Marie Christie	July 22, 2024
I-162	Janet Marie Christie	July 22, 2024
I-163	Jillian Menez	July 22, 2024
I-164	Jennifer Cress	July 22, 2024
I-165	Jerry Shearer Jr.	July 22, 2024
I-166	Lewis Allen	July 22, 2024
I-167	Linda Baker	July 22, 2024
I-168	Lee Bayer	July 22, 2024
I-169	Lana Call	July 22, 2024
I-170	LaJanique Favors	July 22, 2024

Comment Letter	Individual Commenter Name	Date
I-171	LaShuan Favors	July 22, 2024
I-172	Laura Sandidge	July 22, 2024
I-173	Laura Sandidge	July 22, 2024
I-174	Peggy Adaskaveg	July 22, 2024
I-175	Peggy Adaskaveg	July 22, 2024
I-176	Patty Huddleston	July 22, 2024
I-177	Peggy Adaskaveg	July 22, 2024
I-178	Peggy Adaskaveg	July 22, 2024
I-179	Laura Sandidge	July 22, 2024
I-180	Norman Cole	July 22, 2024
I-181	Prasanna Weerakoon	July 22, 2024
I-182	Ruth Ann Ryan	July 22, 2024
I-183	Rose Gerhartz	July 22, 2024
I-184	Robert Rietveld	July 22, 2024
I-185	Steven Balmer	July 22, 2024
I-186	Roylene Scott	July 22, 2024
I-187	Nicole Wengel	July 22, 2024
I-188	Dawn Villavicencio	July 22, 2024
I-189	Debbie Walsh - Rural Association of Mead Valley	July 22, 2024
I-190	Dr. Senanu and Cynthia Spring-Pearson	July 22, 2024
I-191	Erik Ruer – VRPA Technologies	July 23, 2024
I-192	Ajay Shah	July 23, 2024
I-193	Mark Howard	July 23, 2024
I-194	Calos Lliguin	July 24, 2024
I-195	Jimmy Calanchini	July 24, 2024
I-196	Kathleen Bocian	July 24, 2024
I-197	Michael Delpit	July 28, 2024

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

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Comment Letter I-1

Jeffrey Smith

From: Peggylmb peggylmb@aol.com>
Sent: Wednesday, June 19, 2024 1:18 PM

To: Jeffrey Smith

Subject: Meridian D-1 Gateway ACP

Please do not allow anymore early or late (or preferably ever) more commercial flights out of March AFB. The quality of life, sleep, peace and quiet to my neighborhood has been horribly jarred since they change all the flight patterns a few years back. Jets now go over our house at all hours of day and night - can't take a peaceful walk in my neighborhood, nap out by my pool/backyard or even get an uninterrupted nights sleep. It is ridiculous and unnecessary. We have had good neighbors move out of state because of the constant noise! California has so many laws for protection of out environment....how about our peace and quiet? It definitely does affect ones health. Please vote down anymore commercial flights from March....not a good neighborly move. Thank you for your time and consideration.

1-1.1

Peg Bradley 2832 Westridge Road, Riverside, CA 92506 40+ year resident in this house/neighborhood

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

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Response to Comment Letter I-1

Peg Bradley June 19, 2024

I-1.1 This comment raises concerns regarding existing flights and sleep disturbance in opposition to the Proposed Project. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. Please refer to Chapter III, Errata, of this Final EIR for details. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

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Comment Letter I-2

Jeffrey Smith

From: Jennifer Becker <jennyole@gmail.com>
Sent: Thursday, June 20, 2024 9:48 AM

To: Jeffrey Smith

Subject: Question for next community meeting regarding new cargo flights

Attachments: PE Gumport summary JPA.pdf

Dear Mr. Smith,

I attended the community meeting on June 18 to learn about the addition of new cargo flight operations at March Airport. Thank you for your patience with community members who are very anxious about the proposed development.

I-2.1

One question that I hope can be answered with more certainty at the next meeting concerns the hours of operation of flights arriving and departing the airport. A man who I believe is the military airport director stated that no flight operations occur during the overnight hours. When pressed, he said that this limitation is documented but he could not explain why DHL was allowed to fly all through the night. Is it possible that the civilian aircraft operations are not bound by the same restrictions as the military flight operations? Can we hear from the airport director of the cargo air facility on this matter? Gary Gosliga held that position for many years but appears to have moved to Arizona.

1-2.2

I have attached a Press Enterprise article from 2006 that summarizes the findings of a special investigation conducted by attorney Leonard Gumport into actions, bordering on fraud, that were used to push through the approval of the development of civilian cargo at March Airport. I hope it helps to explain the level of distrust and apprehension that many community members feel at the prospect of increased commercial aviation at March Airport.

1-2.3

Best Regards, Jennifer Becker

about:srcdoc



Inquiry: Noise study obscured // DHL planes: The - Press-Enterprise, The (Riverside, CA) - February 26, 2006 - page A01

February 26, 2006 | Press-Enterprise, The (Riverside, CA) | MICHELLE DEARMOND AND KIMBERLY TRONE; THE PRESS-ENTERPRISE | Page A01

Before the DHL cargo port was approved, a developer and top managers with the March Joint Powers Authority resisted releasing a noise study that determined hundreds of Riverside residents could be awakened each night by DHL planes, a new report shows.

Efforts to downplay the noise study's findings are detailed in an independent investigation that also concluded that one of the project's developers, Greg Diodati, allowed an erroneous flightpath map to be used in persuading the public that DHL planes would not fly over their neighborhoods.

DHL began operations at March Air Reserve Base in October, and its cargo planes actually are flying over Riverside's Orangecrest and Mission Grove neighborhoods.

"If there is another smoking gun in the whole report besides the false flight path (map), it is the apparent deliberate withholding of the information that all the residents were asking us for: whether they were going to be woken up by planes," Riverside County Supervisor Bob Buster said Thursday. Buster is also one of eight members on the March Joint Powers Commission.

The results of the noise study were not disclosed at a public meeting Sept. 22, 2004, although a representative of the firm that conducted the study briefly mentioned it and said it would be available soon. The commission voted to give initial approval to the project that night.

The commission ordered the investigation into whether inaccurate flight-path maps were used to deliberately deceive the public. The commission hired Los Angeles lawyer Leonard **Gumport** to conduct the investigation.

The commission governs the authority, which oversees civilian reuse of surplus military land at the joint-use air base.

According to testimony in the report, members of the authority's staff handling the deal and at least one representative of the developer, GlobalPort, obscured the noise study because they feared its release would delay or hurt their effort to seal the competitive air-cargo deal with DHL.

1 of 7

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about:srcdoc

The study focused on how loud a single aircraft would be during the late night and early morning, when most people are sleeping. It determined that about 5 percent of the people in the area of the airport's departure route could be awakened by aircraft noise.

ATTORNEY: NO LEGAL MANDATE

Rob Bower, a GlobalPort attorney, said the authority was not legally required to release the noise study because the number of planes DHL planned to fly was well within limits set in a previous environmental study. The company plans to fly 10 planes daily at March when the project is complete, and the previous review was based on about three times as many flights.

The study was prepared to defend the project from a court challenge brought by a coalition of homeowners and environmentalists who had "come out with all guns blazing," he said.

"We all believed their focus was not the (environmental-impact reports); it was to stop the DHL project no matter what. You don't want to give your opponents a bunch of issues to attack you on if you don't have to," Bower said, adding that the inaccurate flight-path map was unrelated to the supplemental noise study.

Testimony in the Gumport report released Feb. 17 shows that the authority's executive director, Philip Rizzo, and staff members Dan Fairbanks and {SEE CORRECTION} Lori Stone {SEE CORRECTION) opposed the advice of their attorneys, who urged them to disclose the study to the public. Diodati, a developer behind the DHL deal, also wanted the document kept secret.

Steve Anderson, an attorney for the March Joint Powers Authority, said in his interview with the investigator that Diodati and his attorney resisted releasing the study because it showed people could be awakened overnight by the planes.

Rizzo and his staff members said they were not made aware of the draft study until Sept. 22,2004, the day of a rancorous public hearing at which hundreds of area residents turned out to protest the project.

"None of us had seen the study. We resisted because we had not seen it and we weren't sure it should be in there, and we did not know what was in it," Rizzo said Tuesday.

But on Friday, Rizzo released a written statement saying he did not resist when his attorney said

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1-2-3 Cont.

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Cont.

the noise study needed to be made public.

"I agreed and had no hesitation that it should be made public," Rizzo said.

Fairbanks said in a written statement Friday that the attorneys recommended he not review the draft document Sept.22, 2004.

PUBLIC MATERIALS

At a meeting Oct. 6, 2004, the final written version of the study, along with a letter from Diodati that the March authority's attorneys called "cryptic," was inserted in a public packet of materials. Commissioners gave final approval to the project at that sparsely attended morning meeting.

Barrington Daltrey, a Mission Grove environmental lawyer who filed an unsuccessful lawsuit challenging the project in 2004, contends the authority's staff and attorneys deliberately misled the public about the project's impacts by obscuring the study.

"They slipped it in when nobody was paying attention," Daltrey said. "This is a public agency, and they have duties to the public. It's not simply a developer trying to get his own piece of property through the red tape. This is use of public property for public purposes."

Eric Garner of Best Best & Krieger's Riverside office, which represents the authority, said his firm's lawyers fought - even yelling at their clients at one point - to make sure the study was made public and insisted the noise consultant make a presentation at the Sept. 22, 2004, hearing.

Garner said his firm's attorneys overrode the initial objections of the developer by insisting the noise study be put in public documents at the Oct. 6, 2004, meeting and by having the noise consultant mention it during the Sept. 22, 2004, hearing.

"We were determined to make sure that it was included in the public record, and we moved heaven and earth to make it sure that it was," he said.

One Orangecrest resident who supports air traffic at March said he's not bothered by which flight path the planes take, but he does have concerns about the public being misled.

The developers should stick to the initial flight plan they presented to the public, said Charles

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1-2-3

Cont.

Hopkins, who noted that he doesn't hear the planes in his two-story home.

"Anytime you have people with money, it seems they always have some piece of wool they're trying to pull over the people's eyes," Hopkins said. "Does it upset me? Certainly, but that's politics."

Hopkins said he feels bad for the people who purchased homes in that area and now can't sleep because of the noise. But he wonders how they could not expect air traffic when they bought property near an air base.

FUTURE ACTIONS

Buster, the only commissioner to vote against the DHL project in the fall of 2004, wants the March commission to submit **Gumport**'s investigation to the state attorney general to determine whether any laws were violated.

He also has called for a revision of the noise study, taking into account the true takeoff pattern of DHL planes. The study assumed all DHL planes would stay on the same single path during their departure.

The commission has not met to consider those options since **Gumport** released his report Feb. 17.

Buster also said he wants the State Bar of California to review the case to see whether there were any ethics violations by the Best Best & Krieger attorneys representing the authority.

He said Best Best & Krieger lawyer John Brown did not make the commission aware of issues surrounding the noise study or tell commissioners that the document had been introduced into the public record.

Garner said the firm works directly with the authority staff, not the commissioners, except at commission meetings.

A coalition of homeowners and environmentalists behind the failed 2004 lawsuit is considering its options. In the suit, the group accused the March authority and GlobalPort of failing to conduct adequate environmental reviews and misrepresenting the flight path.

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about:srcdoc

"On the surface, there is an implication that genuine fraud occurred. Whenever there is fraud, you have the legal right to revisit the litigation," said Daltrey, who represented the residents.

But Moreno Valley Councilman Richard Stewart, chairman of the commission, said the DHL deal is in no jeopardy. Stewart said the commissioners intend to meet with Best Best & Krieger lawyers next week to settle how future communications between legal counsel and commissioners should be handled.

And Stewart said personnel issues should not be played out in the press. The commission intends to meet with Rizzo on Wednesday in a closed-door meeting to assess his performance.

The DHL project is "a done deal, not imperiled, not hurt. This had to do with whether or not somebody intentionally drew or misdrew a flight plan," Stewart said. "Our biggest concern was whether our own staff had done something wrong, and the report says they did not know they were using a wrong map."

Orangecrest resident Leslie Osburn said she is routinely awakened about 3 a.m. by departing DHL planes. Many area residents knew all along that cargo planes were going to fly overhead, she said. About 20,000 people live in the Orangecrest and Mission Grove neighborhoods.

"There should be some sort of disciplinary action. I don't know what that should be, but we were lied to," Osburn said.

REDEVELOPING MARCH

The commissioners - elected officials from Riverside County and the cities of Perris, Moreno Valley and Riverside - approved the cargo port for German shipping giant DHL in the fall of 2004.

In September 2005, the Federal Aviation Administration said false information had been presented about the standard departure of commercial planes from March.

The commission ordered the independent investigation by **Gumport** in November to determine whether inaccurate maps were used to deliberately deceive the public about the flight path of DHL commercial cargo planes leaving March.

The investigation, released Feb. 17, focused primarily on the flight-path maps displayed at public hearings in September 2004.

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I-2-3 Cont.

about:srcdoc

The members of the authority's staff have acknowledged a map they displayed, which was provided by Diodati, did not reflect the standard departure route of commercial planes. The developer deemed the episode an "honest mistake."

Earlier this month, a separate study by an aviation consultant found that financial projections provided by GlobalPort overestimated by \$16.5 million, or 64 percent, the amount of landing fees DHL would pay to the March authority over 20 years.

The report said developer GlobalPort's July 2004 projections contained errors in spreadsheet calculations and inaccurate airplane landing weights and they overestimated the number of planes DHL would operate at the joint-use military airfield.

The March commission has been working to redevelop the March base since it was downsized in 1996. GlobalPort has contracted with the March authority to develop about 400 acres near the military airfield into a commercial cargo hub.

* * *

TIMELINE

Key dates in the deal's approval and how the noise study was involved:

SEPT. 8, 2004: The first public hearing is held on the cargo-port project, but is cut short due to overcrowding. Opponents of the project complain that proponents haven't done adequate noise studies and follow up with a letter to the Joint Powers Authority attorneys challenging the developer's noise research.

SEPT. 22, 2004, afternoon: The GlobalPort managing partner and members of the March Joint Powers Authority staff meet to prepare for a public hearing on the cargo-port project. GlobalPort and the authority staff members resist the authority's attorneys' advice to release the findings of a new noise study to the public.

SEPT. 22, 2004, evening: The March Joint Powers Commission votes 7-1 to approve a cargo-port plan at a public hearing. A consultant mentions a "single event" noise study during a presentation but says nothing to the commission or the public about the study's conclusions.

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I-2-3 Cont.

about:srcdoc

OCT. 6, 2004: The March Joint Powers Commission gives final legal approval to the cargo plan. The noise study's findings and a "cryptic" letter are put into the agenda package. No mention is made by the staff or the authority's attorney about the study and its significance.

* * *

MARCH CARGO PORT

MARCH JOINT POWERS AUTHORITY: A public agency that oversees commercial reuse of surplus military land at the March Air Reserve Base, which was downsized in 1996. The authority was formed through a joint-use agreement entered into by Riverside County and the cities of Moreno Valley, Perris and Riverside in 1993. The three cities and unincorporated county areas surround the base.

MARCH JOINT POWERS COMMISSION: The commission governs the authority. It's made up of eight elected officials, two from each of the entities that created the authority. The officials are: Moreno Valley Councilmen Richard Stewart and Charles White, Perris Mayor Daryl Busch and Councilman Mark Yarbrough, Riverside Councilmen Ed Adkison and Frank Schiavone, and Riverside County Supervisors Bob Buster and Marion Ashley.

AUTHORITY STAFF: The staff works for the commission. Its top managers are Philip Rizzo, the executive director; Dan Fairbanks, planning manager; and Lori Stone, director of operations.

MARCH GLOBALPORT: A private partnership of local investors and the Texas-based Lynxs Group. GlobalPort has been contracted to redevelop about 400 acres of surplus military property near the March airport into a commercial cargo port.

DHL: The German shipping company is flying about seven or eight cargo planes from March on most days, and by 2010, it expects to be flying 10 planes. Most of the departures occur at night and in the early morning.

CITATION (AGLC STYLE)

MICHELLE DEARMOND AND KIMBERLY TRONE, THE PRESS-ENTERPRISE, 'Inquiry: Noise study obscured // DHL planes: The March authority balked at disclosing the data at a meeting, a report says.', Press-Enterprise, The (online), 26 Feb 2006 A01 https://infoweb.newsbank.com/apps/news/document-view?p=WORLDNEWS&docref=news/1100EE6463276B90

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I-2.3 Cont.

Response to Comment Letter I-2

Jennifer Becker June 20, 2024

- **I-2.1** This comment is an introductory statement. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- It is comment raises concerns about hours of flight operations and past DHL nighttime flights. It appears that the comment is referring to DHL operations from 2005 to 2008, which are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.³⁶ As of 2024, there were fewer than 20 DC-9s still in service.³⁷ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.³⁸ The Proposed Project is not related to past cargo operations. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III, Errata, of this Final EIR for details.
- I-2.3 This comment references an attached 2006 Press Enterprise article discussing a noise study for the DHL operations. As discussed in Response I-2.2, above, the DHL operations are no longer occurring. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

³⁶ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

³⁷ https://simpleflying.com/dc-9-operators-2024/

³⁸ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

Comment Letter I-3

Jeffrey Smith

From:

Sent: Friday, June 21, 2024 2:21 PM To: Jeffrey Smith Subject: March JPA Meridian D-1 Gateway Aviation Center Project Good Afternoon Mr. Smith, I object to the project outlined in the "draft" Meridian D-1 Gateway Aviation Center Project Environmental Impact Report for the following reasons; I-3.1 1. Added air pollution from both aviation and heavy truck traffic and congestion-no clear mitigation of these issues, only relies on State mandates, i.e. "added bicycle lanes and public transit" how is this helping our local air quality and gridlock on the highways? 2. Added noise pollution from both aviation and heavy truck traffic-no clear mitigation of these issues. I 1-3.2 3. The EIR does not include any noise measurements of aircraft flight paths over surrounding residential neighborhoods. The March ARB/March Global Ports include these documents and maps on the website). The sensors provided for this EIR by UrbanX only measure decibels immediately next to the take-off area of the tarmac, why not in the adjacent communities? 4. The representative from March ARB said the control tower only operates between "7 am and 11 pm unless the military needs special coverage". If this is true, how did DHL fly their noisy DC-10s out of March at 1, 2, 3, 4 and 5 am? How are we assured it won't happen again? 5. The ultimate mission of the March JPA is a hand off to March Global Port Authority and continue the expansion of incoming/outgoing cargo flights to 24/7 operations. The "operators", likely Amazon, will pay for the 24/7 staffing of the air traffic control tower. The developer, Lewis is spec building under direction of the March JPA (contracted); developer says they have "no idea" who the tenant will be at this project? 7. The EIR does not include any remediation of infrastructure damaged by heavy truck traffic and roadway repair I 1-3.7 outside of the immediate "operations area" of this project. I 1-3.8 The EIR does not include any place for residents to object to the project. The EIR is composed of "engineer and planner speak" there should be a plain language summary provided with current and projected impact to air quality, noise pollution, impact to roads and highways beyond the immediate operations site. 10. The timing of the EIR release for 45 days (calendar days) public comment is during a period of time May 27, 2024 to July 9, 2024 when families are busy with the school year ending, impending vacations and July 4th holiday, so not focused on actions happening in the community. 11. According to JPA agendas the Meridian Gateway Aviation Center Project was presented to the JPA by the developer in 2021, why wasn't the public notified? 12. What is the short and long-term benefit to the communities of this operation? Do warehouse and truck driving jobs provide self-sufficient wages and career ladders/education? Construction work is short-term and transient and likely not union. Thank you for your presentation at the meeting on June 18th, it's unfortunate you were unable to provide answers to questions posed by the community members. I know several of the March JPA have been part of the commission since 1999, so at least they should have been prepared to answer most of the questions posed, as they do know the answers.

1

Holly Reeves <hollyreeves1@hotmail.com>

Holly Reeves

Response to Comment Letter I-3

Holly Reeves June 21, 2024

I-3.1 This comment alleges that the EIR only relies on state mandates and does not include mitigation measures for air quality impacts related to aviation operations and heavy truck traffic from the Proposed Project. This is inaccurate.

As detailed in Section 3.2, Air Quality, of the EIR, mitigation measures are imposed to reduce the Proposed Project's air quality impacts to the extent feasible. Regarding construction emissions, the Proposed Project would not exceed regional or localized thresholds for construction emissions. Implementation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements) would further reduce construction air quality emissions. The Proposed Project's operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC. NO_x, and CO emissions. Aircraft emissions compose the vast majority of the Proposed Project's emissions and there are no feasible mitigation measures to reduce aircraft emissions because aircraft technology to control emissions has not been developed, although research is ongoing for controlling NOx and improving fuel efficiencies. Additionally, any potential mitigation measures that would address aircraft emissions would be under the jurisdiction of other agencies, such as FAA or EPA. The Proposed Project would implement MM-AQ-3 (Improved Energy Efficiency and Water Reduction), MM-AQ-4 (Truck Requirements), MM-AQ-5 (Commute Trip Reduction), and MM-AQ-6 (Additional Air Quality Tenant Requirements), which would reduce the Proposed Project's VOC, NOx, and CO emissions, but operational-source emissions would continue to exceed the regional thresholds of significance for VOC, NOx, and CO emissions.

Construction and operational traffic are analyzed in Section 3.12, Transportation, of the EIR. The Project Traffic Analysis (EIR Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant.

I-3.2 This comment states that the EIR does not include mitigation measures for noise impacts related to aviation operations and heavy truck traffic from the Proposed Project. As discussed in Section 3.11, Noise, of the EIR, the Proposed Project's aircraft operational noise increases may exceed the applicable noise increase thresholds for noise-sensitive receptors located in the vicinity of the southwest portion of the Markham Street and Brennan Avenue intersection. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e., acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult. The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement of affected residences in sound insulation programs often result in limitations on achieving the necessary

noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation. Traffic noise increases due to the Proposed Project are less than significant in all scenarios and no mitigation is required.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

I-3.3 This comment alleges the EIR does not include noise measurements of aircraft flight paths over surrounding neighborhoods. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. As detailed in Table 3.11-2, the EIR provides existing noise measurements for four locations in surrounding residential areas. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, more distant residential neighborhoods, such as Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." 39 As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near other residential neighborhoods.

I-3.4 This comment raises concerns about hours of flight operations and past DHL nighttime flights. It appears that the comment is referring to DHL operations from 2005 to 2008, which are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁴⁰ As of 2024, there were fewer than 20 DC-9s still in service.⁴¹ Developed in the 1960s prior

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS%20Chapters%2 01-6.pdf.

⁴⁰ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

⁴¹ https://simpleflying.com/dc-9-operators-2024/

to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁴² The Proposed Project is not related to past cargo operations.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-3.5 This comment is in regard to the managing entity of and staffing of the air traffic tower at March ARB. Contrary to the comment's allegations, there are no plans to expand cargo flights to 24/7. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-3.6 This comment questions the lack of identification of a future potential tenant of the Proposed Project. As discussed in Chapter 2, Project Description, of the EIR, there is no proposed tenant at this time. However, as a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by MIPAA for conformance with the EIR; non-conformance may require additional CEQA review.
- **I-3.7** This comment alleges the Proposed Project will not remediate any infrastructure damage or roadway repair caused by heavy truck traffic. In response to a request from the City of Moreno Valley (see Response A-6.11), PDF-TRA-1 has been revised to include a fair-share contribution for pavement maintenance for specified roadways over a 30-year cycle. Although project design features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the Mitigation Monitoring and Reporting Program (MMRP). MIPAA will monitor compliance through the MMRP. Please see Chapter IV, MMRP, of this Final EIR for the revised language of PDF-TRA-1. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-3.8 This comment alleges there is no place for residents to object to the Proposed Project in the EIR. As discussed in Chapter 1, Introduction, of the EIR, there have been multiple opportunities for public comment on the Proposed Project over the last 3 years. The NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. During the 30-day public review period of the NOP, March JPA held a scoping meeting on April 14, 2021. All issues and concerns raised in the comments have been fully addressed and analyzed in this EIR. The Draft EIR was distributed for a 45-day public review from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days to provide time for additional public input (although not required by CEQA). The applicant held community meetings on June 18, 2024, July 1, 2024, and September 24, 2025. Further, all comments received are responded to in this Final EIR.
- 1-3.9 This comment requests a summary of the Proposed Project's air quality, noise pollution, and transportation impacts. As required per CEQA Guidelines Section 15123, Chapter ES, Executive Summary, of the EIR, includes a brief summary of the proposed actions and consequences and

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

identifies each significant effect with proposed mitigation measures, specifically within Section ES.7, Impacts Determined to be Significant, and Table ES-1. Table ES-1 discloses that operational air quality impacts and aircraft operational noise impacts would remain significant and unavoidable even with the implementation of feasible mitigation measures (MM-AQ-3 through MM-AQ-6 and MM-NOI-2, respectively). Transportation impacts would be less than significant with incorporation of mitigation (MM-TRA-1 and MM-TRA-2). As such, the EIR does include easily identifiable conclusions about significant impacts, consistent with the requirements of CEQA Guidelines Section 15123.

- I-3.10 This comment raises concerns regarding timing of the public comment period (early summer). The Draft EIR was distributed for 45-day public review from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for total of 60 days to provide time for additional public input (although not required by CEQA).
- I-3.11 This comment raises concerns regarding public notification about the Proposed Project in 2021. An NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. The public review period for the Initial Study/NOP began on March 31, 2021, and ended on April 29, 2021. During the 30-day public review period of the NOP, March JPA held a scoping meeting on April 14, 2021. Public notice of 2021 March JPA meetings, including agenda items related to the Proposed Project, was provided in accordance with the Brown Act, Government Code Section 54950 et seq. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- It is comment asks what the potential economic benefits associated with the Proposed Project are for the community and prospective workers. As discussed in Chapter 2, one of the Project Objectives of the Proposed Project is to "Provide increased job opportunities for local residents through the provision of employment-generating businesses." According to the applicant, the Proposed Project will have a project labor agreement with local unions. The Proposed Project is anticipated to generate approximately 150 permanent employment opportunities. It is anticipated that these new jobs would be filled by the existing residential population from the greater Riverside County area. According to the California Employment Development Department, for the third quarter of 2023, the average weekly pay in the Transportation and Warehousing sector in Riverside County was \$1,076, or \$55,952 annually. In addition to local employment opportunities, the Proposed Project would increase the March ARB/MIP Airport landing fee revenue and local tax revenue. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- It is comment expresses disappointment regarding the public comment meeting on June 18, 2024, for the Proposed Project. The intent of the meeting was to provide an overview of the Proposed Project. During the meeting, it was requested that all comments be submitted in writing during the public review period, which ended on July 22, 2024. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

⁴³ Employment Development Department. 2025. "Hours & Earnings by Selected Industries." Accessed April 2025. https://labormarketinfo.edd.ca.gov/data/hours-and-earnings.html.

Comment Letter I-4

Public Comment for Meridian D1 Gatew...

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

KJ Karen Jakpor<kmjakpor@gmail.com>

To: Jeffrey Smith <smith@marchjpa.com> Mon 7/1/2024 9:30 AM

Dear Mr. Smith,

I'm a physician from Riverside, and I'm concerned about the impact on environmental health of the air pollution from the proposed project.

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Karen Jakpor, MD, MPH 92506 1-4.1

1-4.2

Response to Comment Letter I-4

Karen Jakpor July 1, 2024

- I-4.1 This comment raises general concerns regarding the air quality impacts of the Proposed Project. Impacts to air quality are addressed in Section 3.2, Air Quality, of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- 1-4.2 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-5

Public Comment for Meridian D1 Gatew...



Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

PH Patty Huddleston<huddlestonpatty@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 12:04 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangeerest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of eargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the eargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Patty Huddleston 92506 1-5.1

Response to Comment Letter I-5

Patty Huddleston July 1, 2024

I-5.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-6

Public Comment for Meridian D1 Gatew...



Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Pe Pe

Peter Pettis<pettis.peter@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 10:05 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Peter Pettis 92508 1-6.1

Response to Comment Letter I-6

Peter Pettis July 1, 2024

I-6.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-7

1 July questions

peggy walton<pwtwalton@att.net> To: Jeffrey Smith <smith@marchjpa.com> Mon 7/1/2024 3:00 PM Hello Mr. Smith. I planned to attend the informational meeting tonight with March JPA representatives regarding the planned Gateway Aviation Center, however, I am ill and will be unable to ask my questions. 1-7.1 Please reply with your responses to this email and also please answer these questions at the meeting tonight as several of my neighbors have the same questions and may be attending. Ouestions At the previous public meeting, I asked for clarification about the actual times that planes would be flying into/out of the new March Cargo facility being proposed. I was told that planes would be flying in during the "early morning hours" (7-10am) and fly out during "late evening" (8-10pm) and "night time" (10-11pm). We were told at that time that only 5% of flights would go out at "night time". The numbers used are averages: an average of 17 flights indicates "on average" there will be 34 new noise events each day, 6 days a week and "on average" 22 flights or 44 noise events per day over the 1-7.2holidays. Given that the numbers given are "averages", there could be fewer than 34 noise events, but more importantly, there will also be more. What is the maximum number of noise events per day that will happen under this plan? 2. My second question refers to your diagram of the air freight cargo center. Your diagram has 7 "gates" for planes. I would like clarification about how this will work given that there are only 7 1-7.3spaces for planes; the first 7 planes have to leave before another 7 can come in; the 2nd group of 7 have to leave before the final group of planes arrives. So it doesn't appear that the statement made to me at the previous meeting, that flights would be inbound in the early morning and outbound in the evening, can be correct. It seems the additional aviation noise from the cargo planes flying over us will be not be clumped to specific times slots but will have to be throughout the day and into the night, added to the current Amazon flights, the general aviation flights, and the military flights. Correct? 3. Lastly, again referring to statements made last time, you expect most of the planes to be 767s, and that is what you tested in your noise tests for runways 14 and 32. Six of the planes in the drawing have two engines, consistent with a 767; but one spot has a plane with four engines, maybe a 747 or an airbus 340/380? So larger (and very noisy) cargo plans are What portion of the 44 additional daily noise events will be from substantially noisier planes than you tested. Can the noisier planes be restricted to only morning or early evening, none after 10pm?

Thank you for responding to my questions.

29 years living under the actual flight path

Peggy Walton, Canyon Crest Resident

Response to Comment Letter I-7

Peggy Walton July 1, 2024

- **I-7.1** This comment is an introductory comment. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-7.2 This comment raises concerns that the project description discusses "average" flights per day but is not clear as to the maximum number of flights per day. Chapter 2, Project Description, of the EIR has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR.
- I-7.3 This comment questions the logistics of arrivals and departures with the cargo building's seven "gates." As explained in Section 2.4.2, Project Operations, of the EIR: "Generally, arrivals would occur in the early morning hours and departures would occur in the late evening hours." The actual arrivals, departures, and handling of air freight cargo on a given day may or may not occur in a manner where all seven occupied gates would need to be vacated to accept new aircraft. Some gates may experience more frequent aircraft quantities, while others might see less.
- I-7.4 This comment questions how noise from the Proposed Project flight operations was analyzed in conjunction with existing civilian and military flight operations. Section 3.11, Noise, of the EIR analyzes the Proposed Project's flight operations when added to the existing baseline of aircraft noise (see EIR Figures 3.11-11 and 3.11-12). The Proposed Project would have the potential to expose area residents southeast of the airport to significant increases in aircraft noise levels. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that prior to issuance of a certificate of occupancy, a noise analysis shall be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in the EIR; absent this documentation, additional environmental review will be required as part of a discretionary action to revise the conditions of approval. Given that incomplete involvement of affected residences in sound insulation programs often results in limitations on achieving the necessary noise level reductions, additional mitigation is not feasible to address noise impacts to area residents due to Proposed Project aircraft operations, which would be significant and unavoidable even with the application of feasible mitigation.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

I-7.5 This comment raises concerns regarding the aircraft depicted on various EIR figures, including Figure 2-5, Site Plan: Air Cargo Center Component. Because there is no proposed tenant at this time, the proposed flight operations scenarios analyzed in the EIR reflects a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. The EIR figures depicting the incorrect

aircraft have been corrected in the Final EIR. These revisions do not constitute new information under CEQA and do not impact the environmental analysis in the EIR.

- I-7.6 This comment requests analysis of noisier planes. Because there is no proposed tenant at this time, the proposed flight operations scenarios analyzed in the EIR reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. MM-NOI-2 requires that prior to issuance of a certificate of occupancy, a noise analysis shall be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in the EIR; absent this documentation, additional environmental review will be required as part of a discretionary action to revise the conditions of approval.
- I-7.7 This comment requests flight restrictions for noisier planes to morning or early evening. MM-NOI-2 requires that prior to issuance of a certificate of occupancy, a noise analysis shall be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in the EIR; absent this documentation, additional environmental review will be required as part of a discretionary action to revise the conditions of approval. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

Comment Letter I-8

Public Comment for Meridian D1 Gatew...

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

ММ

Michele Muehls<michelebello@hotmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 2:25 PM

Dear Mr. Smith,

Thank you for taking the time to read this.

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Michele Muehls Hawarden 92506 1-8.1

Response to Comment Letter I-8

Michele Muehls July 1, 2024

I-8.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gatew...

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Kirk wolf<wolfcoug@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 10:09 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. In fact, my house was so loud and noisy as a result of the flights, we were almost forced to leave.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Kirk Wolf, CFA Riverside, CA 92508 Wolfcoug@gmail.com 818-212-6461 1-9.1

Kirk Wolf July 1, 2024

I-9.1 This comment is Form Letter A, with the addition of personal negative experience during the 2005-2008 March Inland Port Airport cargo operations. This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.

MJPA

EM

Elaine Miller<dsol4et@gmail.com>

To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 7:53 AM

Cc: Catherine Barrett-Fischer <cbfcentury@aol.com>

Dear Mr. Jeffery Smith,

I am writing you as a concerned resident of Riverside. Your planning of more airplanes at the March facility is unacceptable and irresponsible as a representative of Riverside. This idea of the March Joint Powers Association will have lasting effects on the youth of our communities with noise and air pollution. The airplanes will be flying over various elementary and high schools where young adults have inside learning and outside actives, not to mention our parks and family homes. The air pollution we breathe today could cause lasting health effects to everyone. In the future the MJPA should and would be responsible for any health conditions should you move forward with this decision.

Please be responsible and vote to end this suffering for residents and our youth.

Sincerely,

Elaine Miller Markham Street Riverside, California 92504 951-776-9547

Sent from my iPad

1-10.1

Elaine Miller July 1, 2024

I-10.1 This comment raises general concerns regarding noise and air quality impacts to sensitive receptors, such as schools, parks, and homes. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. As detailed in EIR Table 3.11-2, the EIR provides existing noise measurements for four locations in surrounding residential areas. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, more distant residential neighborhoods, such as Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations."44 As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near other residential neighborhoods.

As shown in Table 3.11-23 of the EIR, three elementary or middle schools (Rainbow Ridge Elementary, March Middle, and Serrano Elementary) east of the project site currently experience aviation noise less than 50 dBA CNEL. These schools remain geographically well beyond the 60 dBA CNEL contour on EIR Figures 3.11-11 and 3.11-12, which include contribution of Proposed Project cargo flight operations to future aviation noise levels. Similarly, Mead Valley Elementary, Manuel L. Real Elementary, Tomas Rivera Elementary, and Amelia Earhart Elementary, representing the closest schools to the west, are also well beyond the 60 dBA CNEL contour. To the north, Edgemont Elementary, Towngate Elementary, and Moreno Valley High School are the nearest schools to the project site and are also beyond the 60 dBA CNEL contour; the same can be said for Val Verde High School south of the project site. Such exterior aviation noise levels are considered compatible ("normally acceptable") with schools per the California Governor's Office of Planning and Research's⁴⁵ 2017 California General Plan Guidelines and

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

⁴⁵ As of 2024, the Governor's Office of Planning and Research is now the Governor's Office of Land Use and Climate Innovation.

the Riverside County Airport Land Use Commission's compatibility criteria, as shown in Tables 3.11-5 and 3.11-6 of the EIR, respectively.

Section 3.2, Air Quality, of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13, the Proposed Project would not exceed the SCAQMD LSTs during construction with the incorporation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14, the Proposed Project would not exceed the SCAQMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction and operation. The Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 or from operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Ira and Rajean Long<longfam6@att.net>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 10:14 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

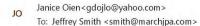
Thank you.

Sincerely, Ira and Rajean Long 92506 1-11.1

Ira Long July 1, 2024

I-11.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Mon 7/1/2024 10:37 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
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Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, <name> <zip code>

Sent from my iPhone

I-12.1

Janice Oien July 1, 2024

I-12.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

JP Jonathan Peaslee<jpeaslee24@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 9:10 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Jonathan Peaslee 92508 1-13.1

Jonathan Peaslee July 1, 2024

I-13.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

JG Jennifer Guzman<jvguzman528@yahoo.com> To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 9:07 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. As residents in the Orangecrest area we already tolerate noise from aircraft's and would not be happy to increase it with added aviation routes. My concern is also the added pollution it will cause for our families and affect our daily lives due to it.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

I-14.2

1-14.1

Thank you.

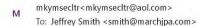
Sincerely, Jennifer Guzman 92508

Sent from my iPhone

Jennifer Guzman July 1, 2024

- **I-14.1** This comment is the first two paragraphs of Form Letter A, with the addition of personal experience with aircraft noise. This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.
- I-14.2 This comment is the last paragraph of Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Mon 7/1/2024 6:04 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, John W. Hagmann, Mission Grove, 92506

Sent from my Verizon, Samsung Galaxy smartphone

1-15.1

John W. Hagmann July 1, 2024

I-15.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Jen L<jlarrattsmith@gmail.com> To: Jeffrey Smith <smith@marchjpa.com> Mon 7/1/2024 5:51 PM Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts 1-16.1 this project would cause to the community. I have been organizing the community against poor land use decisions by the March JPA for two years. In addition, many of the vocal opponents to this project have represented community concerns since the early 2000's. Why does a public authority continue to push projects that have near-unanimous opposition down the community"s throat? 1-16.2 Recently, the March JPA passed an Environmental Justice element that pays lip service to civic engagement. How does this project benefit the environmental justice communities which will suffer from the air and noise pollution of these increased flights? How can you in good conscience continue to say that these projects benefit the community when the community is telling you the opposite? This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the 1-16.3 project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

Sincerely,

Jen Larratt-Smith Chair, R-NOW

Jen Larratt-Smith July 1, 2024

- **I-16.1** This comment raises general concerns about the analysis of the Proposed Project in the EIR. Specific comments are addressed in the following responses.
- In this comment questions the environmental justice analysis in the EIR. An analysis of environmental justice is not required by CEQA. However, the March JPA General Plan includes an Environmental Justice Element. As noted in Section 3.10, Land Use and Planning, Table 3.10-1 of the EIR, the Proposed Project was found to be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Benefits of the Proposed Project include providing new job opportunities to residents in the region and maintaining the jobs/housing balance, as well as reducing commutes to surrounding areas and thus reducing VMT associated with longer commutes. Where 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 Proposed Project consistency with the March JPA General Plan would be less than significant with mitigation incorporated.
- It is comment raises general concerns about the EIR's analysis of the Proposed Project and suggests the consideration of alternatives but does not provide any specific concerns or recommendations. Chapter 5, Alternatives, of the EIR analyzes four alternatives for potential impacts. Additionally, the Proposed Project is separate from, and not related to, the 2005–2008 cargo flights. Lastly, in consideration of public input and concerns, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III. Errata, of this Final EIR.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

GD Gayle Dicarlantonio < gayledmail@gmail.com > To: Jeffrey Smith < smith@marchjpa.com >

Mon 7/1/2024 9:57 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, G DiCarlantonio 92507 1-17.1

Gayle DiCarlantonio July 1, 2024

I-17.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

FM fera momtaz<fera_momtaz@yahoo.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 1:19 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Fera s.Momtaz Orange Crest community 92508

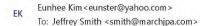
Sent from my iPhone

I-18.1

Fera S. Momtaz July 1, 2024

I-18.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Mon 7/1/2024 1:47 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Eunhee Kim Raleigh, NC 27615 1-19.1

Eunhee Kim July 1, 2024

I-19.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

DW

Deb Whitney < surfjade@yahoo.com >

To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 11:22 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

1-20.1

Sincerely,

Deb Whitney 6790 Mission Grove Pkwy N Riverside, CA 92506

Deb Whitney July 1, 2024

I-20.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Jimenez, Dennise < Dennise. Jimenez @ molinahealthcare.com >

•

To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 9:02 AM

Cc: Dennise Jimenez <dennise.jimenez81@gmail.com>

Dear Mr. Smith,

Thank you for the opportunity to provide feedback on the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR fails to adequately address and mitigate the numerous adverse environmental impacts this project would impose on our community.

Aircraft noise has proven detrimental health effects, including increased rates of insomnia, substance abuse, and cardiovascular disease, as supported by multiple scientific studies.

The Draft EIR neglects to assess the noise impact on residential neighborhoods such as Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, despite these areas being severely affected by March cargo operations during 2005-2008.

The Draft EIR contains numerous numerical inaccuracies and omissions, hindering expert verification of its assertions.

March JPA and associated developers have a history of making misleading claims regarding the impact of cargo operations on nearby communities.

Aircraft emissions contribute significantly to air pollution, which poses serious health risks to residents and exacerbates environmental degradation.

Residents are dismayed by the apparent lack of lessons learned from the cargo flights of 2005-2008. This project is fundamentally flawed, and the Draft EIR significantly underestimates its adverse effects. We urge consideration of more environmentally responsible and community-oriented alternatives.

Thank you.

Sincerely,

Dennise Jimenez | MPH, LVN, CCM, Lean 6σ (Black Belt)

Team Lead for SSBCI Phone Queue, HCS Central Programs (Clinical) MCS EMU Care Management SSBCI Phone Queue Number - 866-472-4582

Genesys Phone: 562-317-2132 & Cell # 951-478-1216 - 🙆 Pacific Time – PST

Dennise.Jimenez@MolinaHealthcare.com







1-21.1

Dennise Jimenez July 1, 2024

I-21.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

RS Richard Stalder<xcoachrs@sbcglobal.net>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 8:54 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Richard Stalder 92506

Sent from my iPad

1-22.1

Richard Stalder July 1, 2024

I-22.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Carolyn Rasmussen < cgrasmus@gmail.com > To: Jeffrey Smith < smith@marchjpa.com >

Mon 7/1/2024 3:26 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Carolyn Rasmussen 92508 Sent from my iPhone 1-23.1

Carolyn Rasmussen July 1, 2024

I-23.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



christine martin<cmcelsemartin@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 9:40 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

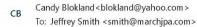
Thank you.

Sincerely, Christine Martin 92506 1-24.1

Christine Martin July 1, 2024

I-24.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Mon 7/1/2024 9:58 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Candy Blokland 92508

Sent from my iPhone

1-25.1

Candy Blokland July 1, 2024

I-25.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

G gryphon-crypt0a@icloud.com To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 9:05 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Brian Wardle 92508 1-26.1

Brian Wardle July 1, 2024

I-26.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

B bettysbag@charter.net
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 8:49 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

I have been a longtime resident and we simply do not need this.

Thank you.

Sincerely, Betty Hao 92508 I-27.1

Betty Hao July 1, 2024

I-27.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Beverly Arias < beverly 951@yahoo.com >
To: Jeffrey Smith < smith@marchjpa.com >

Mon 7/1/2024 9:32 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Beverly M. Arias

Inland Empire Labor Council Delegate

R-NOW Supporter

Casa Blanca Resident 92504

1-28.1

Beverly Arias July 1, 2024

I-28.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Ann Marchand<ann.marchand1@gmail.com> To: Jeffrey Smith <smith@marchjpa.com> Mon 7/1/2024 11:42 AM Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, 1-29.12) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Not sure why you keep pushing for ill-faded ideas. Not only is this an extremely bad idea, it sickens me to think not only will I be woken up in the middle of the night, flights already leave there at ungodly hours as it is. I'm getting tired of the whole thing - you don't seem to give a rat's ass about the residents, only your pocket book. This plan of yours would only add more trucks, more air pollutants, an even worse clogged up 215 freeway, Alessandro will once again 1-29.2be prone to even more semi's flying up and down the road by cut-through traffic. They are not allowed to travel the roads, but they don't care, kind of like you!! I'm not sure how much more you want us to endure.....If this was your neighborhood, your backyard, how would you like this shoved down your throat???? Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Ann Marchand 92506

Ann Marchand July 1, 2024

- I-29.1 This comment is the first five paragraphs of Form Letter A. As such, please see Form Letter A Response.
- I-29.2 This comment raises general concerns regarding air traffic at night, truck traffic, traffic congestion, and air pollution. In consideration of public input, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III, Errata, of this Final EIR for details. The Project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEOA.

Section 3.2, Air Quality, of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13, the Proposed Project would not exceed the SCAQMD LSTs during construction with the incorporation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14, the Proposed Project would not exceed the SCAQMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction and operation. The Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 or from operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.

The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

I-29.3 This comment is the last paragraph of Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

peasleeamber<peasleeamber@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 1:44 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Amber Peaslee RN, MSN, AMB-BC 92508 1-30.1

Amber Peaslee July 1, 2024

I-30.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Jessica McDermott<jess.colleen.mcd@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 12:39 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
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Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Jessica McDermott 92506 1-31.1

Jessica McDermott July 1, 2024

I-31.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Abby Banning<h2oabby@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 12:51 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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Thank you.

Sincerely, Abigail Banning 92508 1-32.1

Abby Banning July 1, 2024

I-32.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

AB Aaron Bushong <a aron.bushong@verizon.net >
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 11:24 AM

Dear Mr. Smith:

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012).

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Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you, Aaron Bushong 24-year resident of the Orangecrest neighborhood 92508 1-33.1

Aaron Bushong July 1, 2024

I-33.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



John Viafora<jrviafora@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 1:19 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

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Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, John Viafora Indigo point, Orange crest 92508

Sent from my iPhone

1-34.1

John Viafora July 1, 2024

I-34.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

AK Abdallah Karim<akarim23@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 11:25 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Abdallah Karim 92508 1-35.1

Abdallah Karim July 1, 2024

I-35.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

JA Joe Aklufi<jaklufi@gmail.com>
To: Jeffrey Smith <smith@marchipa.com>

Mon 7/1/2024 9:09 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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Thank you.

Sincerely, Joseph Aklufi Riverside, 92506 1-36.1

Joe Aklufi July 1, 2024

I-36.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Mon 7/1/2024 9:24 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

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Thank you.

Sincerely,

Ajay Shah 92508 1-37.1

Ajay Shah July 1, 2024

I-37.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

LM Lenora Mitchell<rageturner@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 10:07 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
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- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Lenora Mitchell 92508 1-38.1

Lenora Mitchell July 1, 2024

I-38.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

KD K Doty<dkdoty2@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 1:41 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
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Thank you.

Sincerely,

K.Doty 92508

Sent from my iPhone

1-39.1

K. Doty July 1, 2024

I-39.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-40

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

JS Josie Sosa<josie.sosa@gmail.com> To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 11:49 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Josie Sosa 92508 1-40.1

Josie Sosa July 1, 2024

I-40.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

JS			
	To: Jeffrey Smith <smith@marchjpa.com></smith@marchjpa.com>	Mon 7/1/2024 3:53 PM	
Dea	r Mr. Smith,		
202	nk you for the opportunity to submit comments for the Meridia 1040012). The Draft EIR is inadequate in addressing and mitigat		Ī
this	project would cause to my community.		
Cor	sider:		1,44,4
	ircraft noise has a negative effect on health: Multiple scientific s cardiovascular disease.	tudies show increased insomnia, substance abuse,	-41.1
Ora	he Draft EIR does not consider noise effects on the residential n ngecrest, or Woodcrest, even though these neighborhoods wer rations. The project proposes to have flights occurring in the ea	e severely impacted by the 2005-2008 March cargo	1
incr wel this	ease of flights during the holiday season. I can't think of anythir being of local community members like myself, my family, and way. We live here. This is our home. Can you imagine having yoweek? It is unimaginable.	ng more disruptive to the everyday rest and my neighbors than to have our sleep disrupted in	I-41.2
3) T	e Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its	I -41.3	
	ms. One key omission is the greenhouse gas emissions impacts		1414
	these flights and their carbon emissions were completely exclucern.	dea from the GHG emissions report is of serious	1-41.4
	March JPA and associated developers have a documented history rations on communities surrounding the Air Force Base.	au of misleading claims about the impact of cargo	Ţ
pro	idents are disappointed that the March JPA has not learned its le ject is ill-conceived and fatally flawed from the start, and the Dra ative effects. Please consider less environmentally-harmful, com	aft EIR dramatically underestimates the project's	I-41.5
		The Professional Control of the Cont	-

Thank you.

Sincerely, Jade Sasser Resident of Mission Grove Zip: 92506

Jade S. Sasser, PhD Associate Professor University of California, Riverside jadesasserphd.com

Jade Sasser July 1, 2024

- **I-41.1** This comment is the first three paragraphs of Form Letter A. As such, please see Form Letter A Response.
- I-41.2 This comment raises concerns regarding the impacts of nighttime flights on sleep. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because the applicant has elected to pursue Alternative 6, which would not include any nighttime flights, there is no need to evaluate sleep disturbance under March JPA's threshold. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III, Errata, of this Final EIR for details.
- **I-41.3** This comment is the fourth paragraph of Form Letter A. As such, please see Form Letter A Response.
- I-41.4 This comment claims that the EIR omits GHG emissions from flights generated by the Proposed Project. As disclosed in Section 3.7, Greenhouse Gas Emissions, of the EIR, in accordance with CEQA Guidelines Section 15064.4, GHG emissions resulting from construction and operation of the Proposed Project were quantitatively estimated and are provided for informational purposes. Because there is no proposed tenant at this time, ultimate destinations of the Proposed Project's flights are unknown and flight distances would be speculative. As such, the EIR discloses aircraft GHG emissions to the mixing level, which is the altitude in the atmosphere up to which pollutants and other atmospheric constituents are mixed due to turbulence. In atmospheric modeling for aircraft emissions, the general mixing height is typically around 3,000 feet above ground level. The aircraft emissions were prepared with the FAA AEDT modeling tool to estimate emissions associated with take-off (climb below mixing height) and landing (descend below mixing height). During the climb below phase, the aircraft is still within the lower atmosphere where pollutants can have a more direct impact on air quality and noise levels at ground level. During the descend below mixing height phase, the aircraft emissions are more likely to impact air quality at ground level because they are within the layer of the atmosphere where pollutants are mixed.
- **I-41.5** This comment is the remainder of Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

MS matt silveous<mattsilveous1812@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 10:54 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Matt 92508 1-42.1

Matt Silveous July 1, 2024

I-42.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

MS Melissa Suarez < melissaims@yahoo.com > To: Jeffrey Smith < smith@marchjpa.com >

Mon 7/1/2024 9:49 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Please Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. It takes a simple search to confirm this and should be documented in the EIR.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. This is very concerning and shows how little regard JPA and the developer have for the community.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. This should be rectified immediately before anything else.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. It seems that are unashamed and have zero remorse over their past actions.

As a Orangecrest resident since 2005, I am extremely disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. I loved through that nightmare and I do not want to go through that again. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Melissa Suarez Orangecrest 1-43.1

Melissa Suarez July 1, 2024

I-43.1 This comment is Form Letter A with personal opinions included in each paragraph. This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Mary Viafora<mlviafora@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 8:49 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

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Thank you.

Sincerely, Mary Viafora 92508

Sent from my iPhone

1-44.1

Mary Viafora July 1, 2024

I-44.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

NB Nicole Bernas<onecosmiclove@icloud.com>
To: Jeffrey Smith <smith@marchipa.com>

Mon 7/1/2024 1:58 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

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Thank you.

Nicole Bernas Orange Crest Community 92508

1-45.1

Nicole Bernas July 1, 2024

I-45.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Molly Nazeck<mnazeck@gmail.com> To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 10:52 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse,
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo
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Thank you.

Sincerely, Molly Nazeck Green Acres resident, 92518 1-46.1

Molly Nazeck July 1, 2024

I-46.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

MR MJ Rivera<milo.rivera21052@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 7:40 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally harmful, community-focused alternatives.

Thank you.

Sincerely, Milo J. Rivera

92508

1-47.1

Milo J. Rivera July 1, 2024

I-47.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

SH

Steve Huddleston<shudd1217@charter.net>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 9:03 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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Thank you.

Sincerely, Steve Huddleston

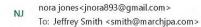
Riverside, 92506

1-48.1

Steve Huddleston July 1, 2024

I-48.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Mon 7/1/2024 9:42 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Victoria Belova Riverside, 92508

Sent from my iPhone

1-49.1

Victoria Belova July 1, 2024

I-49.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

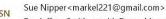
Thank you.

Sincerely, Shaan Saigol Orangecrest Neighborhood, 92508 1-50.1

Shaan Saigol July 1, 2024

I-50.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/1/2024 3:57 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse,
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. We already have many planes flying overhead every day. We don't want any more.

Thank you.

Sincerely, Susan Nipper 92508

1-51.1

Sue Nipper July 1, 2024

I-51.1 This comment is Form Letter A with the addition of "We already have many planes flying overhead every day. We don't want any more." This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

KP KELLEY PAGE<kpage68684@verizon.net>
To: Jeffrey Smith <smith@marchjpa.com>

Tue 7/2/2024 9:45 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Suzanne Page 92508

Sent from my iPhone

1-52.1

Suzanne Page July 2, 2024

I-52.1 This comment is Form Letter A. As such, please see Form Letter A Response.



Air cargo

TC Timothy Connacher<outlook_91FB5B8A9796BD7E@outlook.com> on behalf of Timothy Connache ***

To: Jeffrey Smith <smith@marchjpa.com>

Tue 7/2/2024 10:31 AM

Sent from Mail for Windows

I for one welcome the economic advantage for the inland empire

| 1-53.1

Tim Connacher Riverside, CA. 92504 951-784-0123

Tim Connacher July 2, 2024

I-53.1 This comment expresses support for the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Maria Rodriguez < mariarod 0421@gmail.com > To: Jeffrey Smith < smith@marchipa.com >

Tue 7/2/2024 8:38 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Maria R 92508 1-54.1

Maria Rodriguez July 2, 2024

1-54.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

LS L S<nichole19161@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>
Tue 7/2/2024 4:06 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community as well as the surrounding communities, many of which are Environmental Justice disadvantaged communities. Our communities are already suffering daily irreversible damage from all the warehouses that MJPA has approved and now we will suffer more long term damage if this project moves forward. I will be writing a separate email with specific DEIR questions, but I was so disappointed after attending the community meeting last night that I had to send something now. I also suggest if you have future community meetings, please have a different developer representative. Mr. Timothy Reeves clearly did not want to be at the meeting and was in fact condescending and aloof with many of the community members, not to mention he did not seem to know a lot when it came to difficult questions. Our homes, health, quality of life in our community is at stake here and we deserve to have our concerns taken seriously.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest. Our neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start. The Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. We do support the base and Military operations, but this project is only about money. MJPA does not need this project. Please be a good neighbor.

Thank you.

Laura Sandidge 92508 I-55.3

-55.5

1-55.1

1-55.2

Laura Sandidge July 2, 2024

- I-55.1 This comment is the first sentence of Form Letter A. As such, please see Form Letter A Response.
- It is comment raises general concerns about the adequacy of the EIR's analysis and mitigation. More specific comments are addressed below. The comment references environmental justice communities in the area. An analysis of environmental justice is not required by CEQA. However, the March JPA General Plan includes an Environmental Justice Element. As noted in Section 3.10, Land Use and Planning, Table 3.10-1 of the EIR, the Proposed Project was found to be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Benefits of the Proposed Project include providing new job opportunities to residents in the region and maintaining the jobs/housing balance, as well as reducing commutes to surrounding areas and thus reducing VMT associated with longer commutes. Where 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 Proposed Project consistency with the March JPA General Plan would be less than significant with mitigation incorporated.
- I-55.3 This comment describes the commenter's experience at the July 1 community meeting. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-55.4** This comment is the remainder of Form Letter A. As such, please see Form Letter A Response.
- I-55.5 This comment expresses support for March ARB and its operations and reiterates general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Re: Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

JS	Jade Sasser <jades@ucr.edu></jades@ucr.edu>	•••	
03	To: Jeffrey Smith <smith@marchjpa.com></smith@marchjpa.com>	Tue 7/2/2024 3:19 PM	
Hello	Mr. Smith,		
Thank	x you for the notification. I would like to add some additional comment	S.	I I-56.1
unavo	draft EIR indicates that, despite mitigation measures, the impacts to air oidable." This will be absolutely disastrous in a region whose air quality community member, I find this unacceptable, and am wondering wheth	is already among the worst in the nation.	I-56.2
assoc	EIR's health report only includes information on cancer, however it is viated with a broad range of other chronic and acute health impacts, fro ovascular complications for people with heart conditions and high blood	m allergies to asthma, COPD, and	I-56.3
unavo	the project can be proven to fully mitigate the known air quality issues oidable," this is not a viable project and should not continue, as it puts t pers at risk.		I-56.4

Regards, Dr. Sasser

Jade S. Sasser, PhD Associate Professor Gender & Sexuality Studies University of California, Riverside jadesasserphd.com

On Jul 2, 2024, at 3:09 PM, Jeffrey Smith <smith@marchjpa.com > wrote:

Good Afternoon, Miss Sasser:

Thank you for providing your comments/concerns on the Meridian D-1 Draft EIR. I have added your name and email address to the project notification list for future notices/information related to the Meridian D-1 Project.

Thank you.

<imageO01.png>

Jeffrey M. Smith, AICP Principal Planner

March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, CA 92518 Phone: (951) 656-7000

Jade Sasser, PhD July 2, 2024

- **I-56.1** This is a general introductory comment. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-56.2 This comment raises general concerns regarding the EIR's determination that the Proposed Project would have significant and unavoidable air quality impacts. As detailed in Section 3.2, Air Quality, of the EIR, mitigation measures are imposed to reduce the Proposed Project's air quality impacts to the extent feasible. Regarding construction emissions, the Proposed Project would not exceed regional or localized thresholds. Implementation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements) would further reduce construction air quality emissions. The Proposed Project's operational-source emissions are anticipated to exceed the regional thresholds of significance for VOC, NOx, and CO emissions. Aircraft emissions compose the vast majority of the Proposed Project's emissions and there are no feasible mitigation measures to reduce aircraft emissions because aircraft technology to control emissions has not been developed, although research is ongoing for controlling NO_x and improving fuel efficiencies. Additionally, any potential mitigation measures that would address aircraft emissions would be under the jurisdiction of other agencies, such as FAA or EPA. The Proposed Project would implement MM-AQ-3 (Improved Energy Efficiency and Water Reduction), MM-AQ-4 (Truck Requirements), MM-AQ-5 (Commute Trip Reduction), and MM-AQ-6 (Additional Air Quality Tenant Requirements), which would reduce the Proposed Project's VOC, NOx, and CO emissions, but operational-source emissions would continue to exceed the regional thresholds of significance for VOC, NOx, and CO emissions.
- It is comment alleges the Proposed Project HRA (Appendix C-1 of the EIR) only analyzed cancer risks and not any other health impacts. The EIR and Proposed Project HRA analyzed the Proposed Project's impacts for cancer risk and non-cancer risk. As discussed in Section 3.2 of the EIR, non-cancer health impacts 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." As shown in EIR Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
- I-56.4 This comment states general opposition unless the Proposed Project's air quality impacts are mitigated to less than significant. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

HW Trony Won agreed grant company	
To: Jeffrey Smith <smith@marchjpa.com> Tue 7/2/2024 8:10</smith@marchjpa.com>	PM
Dear Mr. Smith,	
Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impa	cts
this project would cause to my community.	200
Consider:	I-57.1
1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance about and cardiovascular disease. When DHL was flying out of March Air Force base in 2005-2008 we were woken up ever	-
night by their flights. The lack of sleep greatly affected my health and the health and well being of my school age children.	I-57.2
2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March	I-57.3
operations. My house in Mission Grove had an independent company come and record the noise impact in our livi room. It was the loudest point in all of Riverside. The routes flown were not the ones proposed that followed the	-
freeways, but often banked low over residential areas, including our neighborhood and home.	1
3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its	T
claims.	1-57.5
4) March JPA and associated developers have a documented history of misleading claims about the impact of carg	t +
operations on communities surrounding the Air Force Base. We went to the meetings that were open to the public 2005-2008 and were told bold face lies regarding the maps, routes and the noise impact of their operations.	I-57.6
I am both shocked and disappointed that the March JPA is trying to reinstate cargo flights like the ones that were	I
operating in 2005-2008, but also expanding the project. This project is one that has proven to be environmentally harmful, a noise disturbance and one that refuses to take into account the neighborhoods affected.	1-57.7
Thank you.	

Sincerely, Holly Wolf 92508

Holly Wolf July 2, 2024

- I-57.1 This comment is the first two paragraphs of Form Letter A. As such, please see Form Letter A Response.
- I-57.2 This comment raises concerns regarding the negative impacts of the 2005–2008 DHL cargo flights. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁴⁶ As of 2024, there were fewer than 20 DC-9s still in service.⁴⁷ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁴⁸ The Proposed Project is separate from the 2005–2008 DHL cargo flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-57.3 This comment is the third paragraph of Form Letter A. As such, please see Form Letter A Response.
- This comment details an experience of a flight not associated with the Proposed Project deviating from the standard flight path over the Mission Grove neighborhood. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, Mission Grove is outside the 60 dBA contour line. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near Mission Grove. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-57.5** This comment is the fourth and fifth paragraphs of Form Letter A. As such, please see Form Letter A Response.
- I-57.6 This comment raises general concerns about the 2005–2008 DHL cargo flights. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁴⁹ As of 2024, there were fewer than 20 DC-9s still in service.⁵⁰ Developed in the 1960s prior to international and FAA noise

⁴⁶ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

⁴⁷ https://simpleflying.com/dc-9-operators-2024/

 $^{^{48} \}quad \text{https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/light-a$

⁴⁹ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

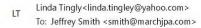
⁵⁰ https://simpleflying.com/dc-9-operators-2024/

standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁵¹ The Proposed Project is separate from the 2005–2008 DHL cargo flights. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

I-57.7 This comment raises general concerns about the 2005–2008 DHL cargo flights and suggests the Proposed Project is a reinstatement and expansion of the 2005–2008 DHL cargo flights. This is incorrect. As discussed in Response I-57.6, above, the Proposed Project is separate from the 2005–2008 DHL cargo flights. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Tue 7/2/2024 6:36 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Linda Tingley Rivera 92508

Sent from my iPhone

1-58.1

Linda Tingley Rivera July 2, 2024

I-58.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Linlin Zhao < fredzhaolin@gmail.com >		
To: Jeffrey Smith <smith@marchjpa.com></smith@marchjpa.com>	Tue 7/2/2024 2:47 PM	
Dear Mr. Smith,		
Thank you for the opportunity to submit comments for the Meridian D1 Ga 2021040012). The Draft EIR is inadequate in addressing and mitigating the this project would cause to my community.		I-59.1
Just last night, a cargo jet is flying at 11:00 pm at night. The noise significar particularly the Orangecrest area.	ntly impacts residents in the neighborhood,	1-59.2
Consider:		
1) Aircraft noise has a negative effect on health: Multiple scientific studies s and cardiovascular disease.	show increased insomnia, substance abuse,	Ī
2) The Draft EIR does not consider noise effects on the residential neighbor Orangecrest, or Woodcrest, even though these neighborhoods were severe operations.		
3) The Draft EIR contains multiple numerical errors and omissions, making i claims.	it impossible for an expert to check its	1-59.3
4) March JPA and associated developers have a documented history of misl operations on communities surrounding the Air Force Base.	leading claims about the impact of cargo	
Residents are disappointed that the March JPA has not learned its lessons f project is ill-conceived and fatally flawed from the start, and the Draft EIR d negative effects. Please consider less environmentally-harmful, community-	dramatically underestimates the project's	

Thank you. Sincerely, Lin Zhao 92508

Linlin Zhao July 2, 2024

- **I-59.1** This comment is the first paragraph of Form Letter A. As such, please see Form Letter A Response.
- I-59.2 This comment details a personal experience with a nighttime cargo flight. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-59.3** This comment is the remainder of Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

D drxman@att.net ...

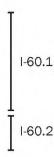
To: Jeffrey Smith <smith@marchjpa.com>
Tue 7/2/2024 2:05 PM

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Please consider those of us who live in these neighborhoods. We don't need anymore cargo centers, air pollution, and air noise. Certainly, we don't need another aircraft disaster, like the one we witnessed several years ago when an aircraft crashed into several buildings. So many of us are considering relocating. This is no longer a favorable place to raise a family.

Thank you,

David Drexler



David Drexler July 2, 2024

- I-60.1 This comment is Form Letter A. As such, please see Form Letter A Response.
- This comment states general opposition to the Proposed Project. The comment further references an area aircraft crash several years ago. Airplane crashes are anomalies and rarely occur. However, given the Proposed Project's proximity to the March Inland Port Airport, the risk of airplane crashes remains. The Riverside County ALUC reviews projects to maximize consistency with airport land use plans for projects within close proximity to an active airstrip. It is beyond the scope of this Proposed Project and EIR to guarantee that airplane crashes will never occur again; however, the analysis within the EIR and the consistency with the airport land use plan would minimize potential impacts to the project site and surrounding communities in the event of another catastrophic event. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Please stop the Meridian D-1 Gateway Aviation Center Project

Susan Diethelm<susan.chris1995@gmail.com>
To: Jeffrey Smith <smith@marchipa.com>

Wed 7/3/2024 12:23 PM

July 3, 2024

Jeffrey M. Smith, AICP - Principal Planner March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

Dear Mr. Smith

We have a number of very serious concerns regarding the proposed Meridian D-1 Gateway Aviation Center Project. These include:

Noise: Six days a week the surrounding community will be tortured with the noise of departing and arriving planes between the hours of 7 am to 11pm. The proposal anticipates 34 flights traversing our skies daily and up to 44 flights during peak times in November and December. Flight times will undoubtedly change due to weather, staff and scheduling changes resulting in flyovers during early morning hours as well. The flights pass directly overhead with deafening noise and thunderous reverberations that shake houses throughout the neighborhood. The EIR states this problem is significant but unavoidable. If there is no way to mitigate this huge noise problem, then the project should not go forward.

Traffic: Traffic will increase in and around our community. The proposal estimates 1276 incoming and outgoing truck trip-ends each day to and from the air base during non-peak months and 1880 trip-ends in November and December. Our streets and freeways are already dangerously congested and this project will further worsen gridlock

Pollution and Greenhouse Gases: Increased truck and air traffic will further worsen local air pollution — already among the worst in the nation — and greenhouse gas emissions, contributing to a further degradation of our quality of life and increasing health care costs in our region. The EIR states this problem is significant but unavoidable. As with the noise problem, if the problem is unavoidable, the project should be canceled.

Increased Water and Energy Use: The project will demand more water and energy already stretching our limited resources. Once implemented, this site is projected to use 27.9 gpm/day (39,060 gallons of water/day). As the average Southern CA home uses 500 gallons/day, this project takes away water from 78 homes each day.

Warehouses: More warehouses will be built to accommodate the increased conveyance of cargo that will further degrade our community and increase truck traffic throughout.

Proponents of the project, and the EIR report, continually focus attention on the 150 jobs this project will add to our area workforce, a small benefit that hardly justifies the depreciation of our community, with regard to both quality of life and indirect costs (healthcare, transportation gridlock). The expected reduction in property values throughout the greater Riverside, Perris, and Moreno Valley alone, along with the loss of property tax revenue, demands reconsideration of the costs and benefits of this project. It is not difficult to envision numerous other ways to better utilize this land and its existing facilities that could bring far more well-paid jobs that improve rather than degrade our community.

The Meridian D-1 Gateway Aviation Center Project must be stopped.

Sincerely, Christian Lyfle, Ph.D. Susan Diethelm, M.D. Amy Lyfle, B.S. 1260 Ransom Rd Riverside, CA 92506 | I-61.1 | I-61.2 | I-61.3 | I-61.4 | I-61.5

Christian Lytle, PhD; Susan Diethelm, MD; and Amy Lytle, BS July 2, 2024

I-61.1 This comment raises concerns about aircraft noise based on the number of flights and times of operation. For clarification of terminology, a "flight" comprises two flight operations: a take-off and a landing. The numbers referenced by the comment relate to flight operations, not flights. Chapter 2, Project Description, of the EIR has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR.

As discussed in Section 3.11, Noise, the Proposed Project's aircraft operational noise increases may exceed the applicable noise increase thresholds for noise-sensitive receptors in the vicinity of the southwest portion of the Markham Street and Brennan Avenue intersection. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e., acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult. The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions.

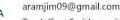
In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

I-61.2 This comment raises concerns regarding potential traffic generated by the Proposed Project and traffic congestion on area roads. The comment incorrectly identifies the Proposed Project total trip generation as truck trips. As shown in Table 3.12-6, during the non-peak season, the Proposed Project would generate 1,276 total daily trips, with 276 daily truck trips and 1,000 daily passenger vehicle trips. During the peak season, the Proposed Project would generate 1,880 total daily trips, with 408 daily truck trips and 1,472 daily passenger vehicle trips. The Project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour

intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As discussed in Section 3.12, Transportation, of the EIR, with implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

- I-61.3 This comment raises general opposition to the Proposed Project regarding air quality and GHGs. No comments, questions, or concerns about the environmental analysis included in the EIR are raised. Impacts to air quality are addressed in Section 3.2, Air Quality, of the EIR. Impacts to GHG emissions are addressed in Section 3.7, Greenhouse Gas Emissions, of the EIR. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions.
- I-61.4 This is a general comment in regard to potential increased water and energy usage by the Proposed Project. Contrary to the comment's suggestion, the Proposed Project would not take away water from homes. As discussed in Section 3.14, Utilities and Service Systems, of the EIR, the water supply needs of the Proposed Project have been incorporated into the water supply planning evaluations of the WMWD and Metropolitan 2020 UWMPs, which indicate that sufficient water supplies are available to meet expected demand for customers and member agencies from 2020 through 2045 under normal. single-dry-year, and multiple-dry-year conditions. In addition, WMWD has provided a will-serve letter clarifying that WMWD has sufficient capacity to supply water for the Proposed Project (Appendix N-4 of the EIR). As a result, the Proposed Project would have sufficient water supplies available to serve the Proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years. Impacts would be less than significant. As discussed in Section 3.5, Energy, the Proposed Project's construction and operations would not result in the inefficient, wasteful, or unnecessary consumption of energy. In addition, mitigation measures incorporated to address air quality would have the co-benefit of further reducing energy demand. No comments, questions, or concerns about the environmental analysis included in the EIR are raised. Water and energy usage impacts are addressed in Section 3.14 and Section 3.5, respectively, in the EIR.
- This comment raises general opposition in regard to potential economic impacts associated with the Proposed Project. As discussed in Chapter 2 of the EIR, one of the objectives of the Proposed Project is to "Provide increased job opportunities for local residents through the provision of employment-generating businesses." According to the applicant, the Proposed Project will have a project labor agreement with local unions. The Proposed Project is anticipated to generate approximately 150 permanent employment opportunities. It is anticipated that these new jobs would be filled by the existing residential population from the greater Riverside County area. According to the California Employment Development Department, for the third quarter of 2023, the average weekly pay in the Transportation and Warehousing sector in Riverside County was \$1,076, or \$55,952 annually. In addition to local employment opportunities, the Proposed Project would increase the March ARB/MIP Airport landing fee revenue and local tax revenue. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



To: Jeffrey Smith <smith@marchjpa.com>

Tue 7/2/2024 5:02 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Ana Ramirez 92508

Sent from my iPhone

1-62.1

Ana Ramirez July 2, 2024

I-62.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



ANTHONY SCIMIA JR<tscimia@sbcglobal.net>
To: Jeffrey Smith <smith@marchjpa.com>

Tue 7/2/2024 9:53 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Anthony Scimia Jr. 20829 Indigo Point, Riverside ,Ca,92508 Orangecrest

Sent from my iPhone

1-63.1

Anthony Scimia Jr. July 2, 2024

I-63.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Re: Community Meeting: Meridian D-1 Gateway Aviation Center Project

JF

john farnsworth<johnrfarnsworth@att.net>

To: Jeffrey Smith <smith@marchjpa.com>; john farnsworth <johnrfarnsworth@att.net>

Tue 7/2/2024 3:12 PM

Hello Mr Smith

I attended the public meeting last night - learned a lot more. You indicated during the meeting that you might be able to answer some clarifications before the DEIR comments are due (extended I believe).

or can I review in the

1. Can you provide a link to all referenced/applicable FAA documents, studies, regulations referenced in the DEIR (or can I review in the JPA offices)? This would be very helpful.

2. What can you provide to support page 2.3 Project Objectives that describe the study (ies), analysis (es), documentation, recommendations that were used to be able to claim stated objective "...regional demands for air cargo services...thereby

recommendations that were used to be able to claim stated objective "...regional demands for air cargo services...thereby alleviating congestion and <u>overtaxed</u> air and <u>road facilities</u> within the greater region". Can a definition of road facilities be clarified to better understand how it it used within the DEIR and how did the DEIR address

"A discussion of the potential error or bias should be carried into analyses" (from CEQA technical advisory)?

Thank you for your assistance.

John Farnsworth 95/202-0984

On Tuesday, June 25, 2024 at 11:00:18 AM PDT, Jeffrey Smith <smith@marchjpa.com> wrote:

Good Morning,

The March Joint Powers Authority is hosting a second Community Meeting for the Meridian D-1 Gateway Aviation Center Project, Monday, July 1, 2024, 6:00 pm – 8:30 pm.

The proposed Meridian D-1 Gateway Aviation Center Project consists of an Air Cargo Center Component and Off-Site Component located on approximately 46 acres. Join us to learn more about the proposed Project.

Please see the attached notice for more information.

Thank you.



Jeffrey M. Smith, AICP

Principal Planner

March Joint Powers Authority

14205 Meridian Parkway, Suite 140

Riverside, CA 92518 Phone: (951) 656-7000

Cell: (951) 807-7283

Fax: (951) 653-5558

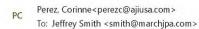
Email: smith@marchipa.com

Web: www.marchjpa.com

John Farnsworth July 2, 2024

- I-64.1 This comment is an introductory statement. The EIR was distributed for a 45-day public review from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days, to provide time for additional public input (although not required by CEQA). No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-64.2 This comment requests access to FAA-related reference material, which was provided on July 10, 2024. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- Inis comment requests references to support the Proposed Project objective related to alleviating congestion and overtaxed air and road facilities within the greater region. Please see Regional Air Cargo Capacity Overview (Appendix Q) of this Final EIR. Impacts to traffic are addressed in Section 3.12, Transportation, of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- This comment appears to quote a fragment of the final sentence of Appendix 2 of the OPR Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018). The full sentence reads, "A discussion of the potential error or bias should be carried into analyses that rely on VMT analysis, such as greenhouse gas emissions, air quality, energy, and noise." These analyses did not rely on the Proposed Project's VMT analysis, but rather the Proposed Project trip generation. See Section 3.7, Greenhouse Gas Emissions; Section 3.2, Air Quality; Section 3.5, Energy; and Section 3.11, Noise, of the EIR. Specifically, with respect to GHG, air quality, and energy, the mobile source emissions were calculated based on trip rates, trip lengths, and emission factors from EMFAC2021. Separate model runs were utilized to more accurately model emissions resulting from passenger car and truck operations. VMT for transportation is calculated as an efficiency metric per the OPR Guidelines. The VMT analysis does not calculate total VMT associated with the Proposed Project. It is more appropriate for the GHG, air quality, and energy analyses to rely on the trip rates from the transportation analysis and the associated trip lengths established by similar projects within the SCAQMD jurisdiction.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



Tue 7/2/2024 2:37 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. We continue to have airplanes flying overhead at 11 pm, for example 7/1/24. As we sit outside in our backyard, we have the loud sounds of planes that fly overhead. Some fly so low that it feels like we can touch the underbellies of these massive planes. Residents can't enjoy our walks to the park without listening to the sounds of the planes overhead doing maneuvers and feeling an invasion of a quiet neighborhood. I can't even begin to imagine the damage to our health and environment they have caused us over the years.

Thank you.

Sincerely, Corinne Perez 92508 1-65.1

1-65.2

Corinne Perez July 2, 2024

- I-65.1 This comment is Form Letter A. As such, please see Form Letter A Response.
- I-65.2 This comment describes personal experience with flight noise not related to the Proposed Project. It is unclear if the comment describes military or civilian aircraft. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Noise impacts are addressed in Section 3.11, Noise, of the EIR.
- This comment raises general concerns regarding the impacts of aircraft noise on health. Goal 2 of the March JPA General Plan Noise/Air Quality Element aims to "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." In 2008, the National Academies of Sciences, Engineering, and Medicine released Effects of Aircraft Noise: Research Update on Select Topics, which stated "[t]rying to identify, measure, and quantify any potential effects of aviation noise on health is a complex and difficult field of study. Variations on how to identify and/or measure the noise exposure itself (single dose, long-term average, number of events above a certain level, etc.), and attempting to separate the effects from other life events are difficult at best. For example, lifestyles, life's stressors, hereditary factors, and genetic composition are just a few factors that may distort potential results of an aviation noise health effects study."53 The report reviewed the following:
 - Cardiovascular effects: "Some studies have identified a potential correlation between increased hypertension and aviation or road noise above certain noise thresholds; however, other studies contradict such findings. Occupational noise often becomes an intricate concern."
 - Effects on children: "Neither psychiatric disorders nor environmental factors showed any relationship to noise; however, psychophysiological parameters (e.g., heart rate and muscle tension) did demonstrate some relationship to noise."
 - Hospitals and care facilities: "Most airport noise and land-use compatibility guidelines list hospitals
 and care facilities as noise-sensitive uses, although there are no studies that have identified health
 effects associated with aviation noise."
 - Hearing impairment: "recent studies conclude aviation noise does not pose a risk factor for child or adolescent hearing loss, but perhaps other noise sources (personal music devices, concerts, motorcycles, or night clubs) are a main risk factor. Because aviation and typical community noise levels near airports are not comparable to the occupational or recreational noise exposures associated with hearing loss, hearing impairment resulting from community aviation noise has not been identified."

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not

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March JPA (Joint Powers Authority). 1999. General Plan of the March Joint Powers Authority. https://www.marchjpa.com/documents/docs_forms/general_plan_updt_011718.pdf.

National Academies of Sciences, Engineering, and Medicine. 2008. Effects of Aircraft Noise: Research Update on Select Topics. Washington, DC: The National Academies Press. https://doi.org/10.17226/14177.

include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

SB Steven Balmer<sjgbalmer@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Tue 7/2/2024 1:32 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Please review.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Steve Balmer 92508 1-66.1

Steven Balmer July 2, 2024

I-66.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Re: Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period

Peggylmb<peggylmb@aol.com> To: Jeffrey Smith <smith@marchjpa.com>

Wed 7/3/2024 2:09 PM

Thank you for the update. I was at the meeting on Monday July 1st, thank you for all the information and slides show. I still as an impacted resident do not feel the environmental negatives of added noise, worse air quality and added traffic are worth the cost of this project. Our neighborhood is already on overload with negative quality of life issues involving these 3 areas; adding to these significant problems by determining that adding more negative environmental damage to our already overloaded area because its already bad, is not encouraging.

Thank you for your time and consideration.

1-67.1

On Wednesday, July 3, 2024 at 01:45:13 PM PDT, Jeffrey Smith <smith@marchipa.com> wrote:

Good Afternoon:

The March Joint Powers Authority (March JPA) has extended the comment period on the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012). The comment period will now end on Monday, July 22, 2024. As noted on the Notice of Availability, the Draft EIR is available for review at the March JPA's office or on the March JPA's webpage at:

· https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

For more information, please refer to the attached notice.

Thank you.



Jeffrey M. Smith, AICP

Principal Planner

March Joint Powers Authority

14205 Meridian Parkway, Suite 140

Phone: (951) 656-7000

Cell: (951) 807-7283

Fax: (951) 653-5558

Email: smith@marchipa.com

Riverside, CA 92518

Web: www.marchjpa.com

PLEASE VISIT <u>WWW.MARCHJPA.COM</u> OR CALL (951) 656-7000 FOR MORE INFORMATION. THANK YOU.

Peg Bradley July 3, 2024

This comment raises general concerns regarding noise, air quality, and traffic. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Noise impacts are addressed in Section 3.11, Noise, of the EIR. Impacts to air quality are addressed in Section 3.2, Air Quality, of the EIR. The Project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Wed 7/3/2024 9:46 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

As a resident of Mission Grove, we already have planes flying over our home. We will not tolerate more air traffic out of March AB. We will not go down without a fight!

Thank you.

Sincerely,

Steve and Patty Huddleston

Mission Grove

1-68.1

1-68.2

Steve and Patty Huddleston July 3, 2024

- **I-68.1** This comment is Form Letter A. As such, please see Form Letter A Response.
- I-68.2 This comment raises general concerns regarding existing air traffic out of March ARB and opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)



julie weatherford<julieweatherford@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Thu 7/4/2024 3:02 PM

Dear Mr. Smith,

As a lifelong Riverside resident and retired public health professional with strong commitments to environmental health and sustainability, I thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
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Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Julie Weatherford 92506 1-69.1

Julie Weatherford July 4, 2024

I-69.1 This comment is Form Letter A with the addition of personal information. This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

CE Candi Erwin<andierwin@hotmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

Thu 7/4/2024 9:32 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
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Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Candi Erwin 92506

Get Outlook for iOS

1-70.1

Candi Erwin July 4, 2024

I-70.1 This comment is Form Letter A. As such, please see Form Letter A Response.

(No subject)

Mona<ladymonaliu@gmail.com>
To: Jeffrey Smith <smith@marchjpa.com>

D-1 Gateway Aviation Center Project really should be stopped.

Sat 7/6/2024 7:56 PM

Mr. Smith

I am writing this email to strongly oppose the proposed Meridian D-1 Gateway Aviation Center Project. Based on the concerns discussed below, I believe that the project 1-71.1 should not go forward at all. The anticipated 34-44 daily flights will significantly increase noise level in our neighborhood and bring thunderous reverberations that shake our houses. 1-71.2Six days a week with the noise from 7 am to 11 pm will seriously affect our health and negatively impact our well-being. Traffic will undoubtedly increase around our community. The proposal estimates 1000+ incoming and outgoing trucks each day and 1800 trucks in November and December. Given that our freeways are already unbearably congested, this is insane. 1-71.3Increased truck and air traffic will further worsen local air pollution (which is already among the worst in the nation), contributing to worsening well-being and increasing health care demand in our region (which is already among the poorest in California). With those serious concerns and potential allegations associated with it, the Meridian

Sincerely,

Mona Liu

Mona Liu July 6, 2024

- **I-71.1** This comment is introductory in nature and provides general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-71.2 This comment raises concerns about aircraft noise based on the number of flights and times of operation. For clarification of terminology, a "flight" comprises two flight operations: a take-off and a landing. The numbers referenced by the comment relate to flight operations, not flights. Chapter 2, Project Description, has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR.

As discussed in Section 3.11, Noise, the Proposed Project's aircraft operational noise increases may exceed the applicable noise increase thresholds for noise-sensitive receptors in the vicinity of the southwest portion of the Markham Street and Brennan Avenue intersection. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e., acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult. The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation. CEOA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

I-71.3 This comment raises concerns regarding potential traffic generated by the Proposed Project and traffic congestion on area roads. The comment incorrectly identifies the Proposed Project total trip generation as truck trips. As shown in Table 3.12-6 of the EIR, during the non-peak season, the Proposed Project

would generate 1,276 total daily trips, with 276 daily truck trips and 1,000 daily passenger vehicle trips. During the peak season, the Proposed Project would generate 1,880 total daily trips, with 408 daily truck trips and 1,472 daily passenger vehicle trips. The Project Traffic Analysis (Appendix M-1 of the EIR) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. As discussed in Section 3.12, Transportation, of the EIR, with implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

The comment further raises concerns regarding the Proposed Project's health impacts due to air quality. The Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of **MM-AQ-1** (Construction Management Plan) or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.

I-71.4 This comment reiterates general opposition to the Proposed Project but does not specify any specific concerns regarding the adequacy of the environmental analysis in the EIR.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

CL Carlos LLiguin<malinalli_1997@yahoo.com>
To: Jeffrey Smith <smith@marchjpa.com>

Sat 7/6/2024 4:01 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Carlos Lliguin 92508 1-72.1

Carlos Lliguin July 6, 2024

I-72.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

TF	The Harvilla Family <harvilla4@msn.com></harvilla4@msn.com>	***	
	To: Jeffrey Smith <smith@marchjpa.com></smith@marchjpa.com>	Sun 7/7/2024 7:23 PM	
	Cc: Jen L <jlarrattsmith@gmail.com></jlarrattsmith@gmail.com>		
Dear N	Ar. Smith,		
Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to Orangecrest.			I-73.1
When I purchased my home in Orangecrest in 1991, I was advised there would be military flights over my home. I have no issue with military flights. Then, DHL cargo flights came right over Orangecrest from 2005-2008, many times in the middle of the night, with very noisy jets.			I-73.2
The current commercial planes (mainly Amazon Prime) are quieter than DHL's, but they can still be heard at night. Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.			1-73.2
The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.		I-73.3	
Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.			I-73.4
Thank you.			

Sincerely, George Harvilla Riverside 92508

George Harvilla July 7, 2024

- I-73.1 This comment is introductory in nature and provides general opposition to the Proposed Project. The comment states that the EIR is inadequate, but it does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- Inis comment describes past experiences with military flights, 2005–2008 DHL cargo flights, and current Amazon flights, specifically in relation to nighttime flights. Noise impacts are addressed in Section 3.11, Noise, of the EIR. The identified DHL cargo flights are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁵⁴ As of 2024, there were fewer than 20 DC-9s still in service.⁵⁵ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁵⁶ The Proposed Project is separate from the 2005–2008 DHL cargo flights and the existing Amazon flights.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

I-73.3 This comment raises concerns about noise impacts to residential neighborhoods west of I-215 and northwest of March ARB/Inland Port Airport. As discussed in Section 3.11 of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mission Grove, Canvon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much

 $^{^{54} \}quad \text{https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation} \\$

⁵⁵ https://simpleflying.com/dc-9-operators-2024/

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

smaller number of civilian aircraft operations."⁵⁷ As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest. As discussed in Response I-73.2, above, the Proposed Project is separate from the 2005–2008 DHL flights, which are no longer occurring.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

I-73.4 This comment raises general concerns about the EIR's analysis of the Proposed Project and suggests the consideration of alternatives but does not provide any specific concerns or recommendations. Chapter 5, Alternatives, of the EIR analyzes four alternatives for potential impacts. Additionally, the Proposed Project is separate from, and not related to, the 2005–2008 cargo flights. In consideration of public input and concerns, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

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DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

FE

FRANK ERDODI<honiebun2k@aol.com>
To: Jeffrey Smith <smith@marchjpa.com>

Mon 7/8/2024 5:06 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Frank and Michelle Erdodi 92508

Sent from my iPad

1-74.1

Frank and Michelle Erdodi July 8, 2024

I-74.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Meridian D-1 Gateway Aviation Center Project Draft EIR Comment

JB Jennifer Becker < jennyole@gmail.com>
To: district5@rivco.org; district1@rivco.org; Conder, Chuck < cconder@riverside Mon 7/8/2024 9:54 AM



Dear March Joint Powers Commissioners and JPA staff,

I am a founding member of the Castleview Arroyo Project, a Riverside neighborhood group with more than 200 members that has formally adopted Castleview Park, a 26-acre wilderness park in Canyon Crest. Since our founding in 2017 we have sponsored annual park cleanups, a popular Neighborfest event, and hosted numerous naturalist-led educational outings in the park.

Castleview Park and Sycamore Canyon Park are the only two natural parks in the City of Riverside that have year-round streams flowing through them. They provide habitat for a rich diversity of wildlife and easy access to a wilderness experience for thousands of people in our region.

I attended both community meetings for the proposed expansion of air cargo capacity at March Airport and learned that the project will result in up to 22 additional air cargo flight departures per day, six days per week, clustered in the morning hours. The number of flights in one day could be much higher, as the EIR only reported average flights per day rather that maximum flights per day. The flight track used by commercial air cargo pilots extends further north than the tracks typically used by March military pilots. Air cargo flights routinely turn west over the middle of both Sycamore Canyon Park and Castleview Park. An example Atlas Air (Amazon) flight track is attached.

The impact of dozens of closely spaced jet departures routed directly over these arroyo parks will irreparably harm our last remaining urban wilderness, as most recreational activities take place during morning hours. Noise studies presented in the draft EIR fail to account for the effect of jet noise on park visitors and wildlife. I encourage you to vote no on a project that will permanently destroy the last remaining islands of wilderness available to your constituents.

Sincerely, Jennifer Becker I-75.1

1-75.2

1-75.3

1-75.4

Jennifer Becker July 8, 2024

- I-75.1 This comment is introductory in nature and describes Castleview Arroyo and Sycamore Canyon Park.

 The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-75.2 This comment raises concerns that Chapter 2, Project Description, of the EIR discusses "average" flights per day but is not clear as to the maximum number of flights per day. Chapter 2 has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR.
- I-75.3 This comment raises general concerns regarding the flight path of the Proposed Project's aircraft. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-75.4 This comment alleges the EIR fails to account for the effects of aircraft noise on parks and wildlife. Noise impacts are addressed in Section 3.11, Noise, of the EIR, and impacts to biological resources are addressed in Section 3.3, Biological Resources, of the EIR. The comment mentions Castleview Arroyo and Sycamore Canyon, which are respectively approximately 3.5 and 0.6 miles northwest of the 65 dBA CNEL Baseline +Peak Project aviation noise contours (i.e., the 60-65 dBA CNEL green-colored band) shown in Figure 3.11-12 of the EIR. While flights may be visible and audible under the right conditions, changes to the outdoor ambient noise level exposures (expressed as CNEL) in these off-site areas attributed to Proposed Project aviation traffic are not expected to be significant. While the impacts of noise on wildlife are highly variable depending on the species, existing urbanization of the landscape, and time of year (e.g., breeding season), it is expected that wildlife in Castleview Arroyo and Sycamore Canyon, which are both open space areas in an urbanized landscape, can tolerate up to 60 dBA hourly Leq, which is a magnitude similar to normal speech.58 Given that Castleview Arroyo and Sycamore Canyon are outside of the 60 dBA CNEL Baseline + Peak Project aviation noise contour (i.e., the outer edge of the 60-65 CNEL range) by approximately 3.5 miles and 0.6 miles respectively, they would be exposed to lower aviation-attributed CNEL since sound decreases with increased distance from the noise source. Hence, the Proposed Project noise impacts would be less than 60 dBA CNEL and would not be a significant impact to wildlife species.

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

Bowles, A.E. 1995. "Responses of Wildlife to Noise." In *Wildlife and Recreationists Coexistence Through Management and Research*, edited by R.L. Knight and K.J. Gutzwiller, 109–156. Washington, DC: Island Press.

Air cargo at March Air Reserve Base

AL Amy Litt<amy.litt@ucr.edu> ...

To: district5@rivco.org; district1@rivco.org; Dan Fairbanks <fairbanks@marchjpa Tue 7/9/2024 1:05 PM

Please do not go forward with the plan to increase commercial air cargo at March Air Reserve Base. The additional truck and plane traffic will add to our already toxic air pollution, traffic congestion, and noise pollution. March ARB does not need this additional traffic, as the home of the new tanker planes it is serving a vital function and is not endangered. However the additional traffic will add to the decline in the quality of life in beautiful peaceful Riverside, particularly beautiful, quiet, idyllic Castleview Arroyo and Sycamore Canyon, wildlife treasures in the heart of the city. Please do not do this.

Amy Litt 1250 San Cristobal Drive Riverside, CA 92506 1-76.1

Amy Litt July 9, 2024

- **I-76.1** This comment expresses general opposition to the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- 1-76.2 This comment raises concerns regarding the Proposed Project's truck trips and aircraft operations, specifically in relation to air quality, traffic congestion, and noise. The comment raises no specific issues, questions, or concerns about the analysis in the EIR. As discussed in Section 3.2, Air Quality, impacts associated with operational air quality would be significant and unavoidable even with the application of MM-AQ-3 (Improved Energy Efficiency and Water Reduction), MM-AQ-4 (Truck Requirements), MM-AQ-5 (Commute Trip Reduction), and MM-AQ-6 (Additional Air Quality Tenant Requirements). As discussed in Section 3.12, Transportation, impacts to transportation will be mitigated to less than significant by incorporating MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street). Peak hour intersection operation analysis (delay and associated LOS) is no longer used to determine traffic impacts for CEQA. As discussed in Section 3.11, Noise, impacts associated with operational flight noise would be significant and unavoidable even with the implementation of MM-NOI-2 (Future Tenant Aircraft Fleet). In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- In this comment suggests the Proposed Project would negatively impact March ARB. The comment raises no specific issues, questions, or concerns about the analysis in the EIR. March ARB/Inland Port Airport is a joint use airport, accommodating both military and civilian aircraft operations under the Joint Use Agreement. The MIP Airport is the civilian facility that is managed and operated by the MIPAA. Under the Joint Use Agreement, MIPAA and the military entities share essential aviation facilities, such as the control towers and runways, as well as maintenance of facilities. The maximum annual flight operations for the Proposed Project (10,608 flight operations) would not exceed the currently available civilian air flight operations annual capacity under the Joint Use Agreement, which is 21,000 flight operations. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.).
- I-76.4 This comment raises concerns as to the impacts of additional traffic in the area to surrounding biological resources. Noise impacts are addressed in Section 3.11 of the EIR, and impacts to biological resources are addressed in Section 3.3, Biological Resources, of the EIR. The comment mentions Castleview Arroyo and Sycamore Canyon, which are respectively approximately 3.5 and 0.6 miles northwest of the 65 dBA CNEL Baseline +Peak Project aviation noise contours (i.e., the 60–65 dBA CNEL green-colored band) shown in Figure 3.11-12 of the EIR. While flights may be visible and audible under the right conditions, changes to the outdoor ambient noise level exposures (expressed as CNEL) in these off-site areas attributed to Proposed Project aviation traffic would not be significant. While the impacts of noise on wildlife are highly variable depending on the species, existing urbanization of the

landscape, and time of year (e.g., breeding season), it is expected that wildlife in Castleview Arroyo and Sycamore Canyon, which are both open space areas in an urbanized landscape, can tolerate up to 60 dBA, which is similar to normal speech. Given that Castleview Arroyo and Sycamore Canyon are outside of the 60 dBA CNEL Baseline + Peak Project aviation noise contour, the Proposed Project noise impacts would be less than 60 dBA and would not be a significant impact to wildlife species. As for anticipated truck traffic on the local roadway network, Exhibit 4-1, Project (Truck) Trip Distribution, of the Project Traffic Analysis (Appendix M-1 of the EIR) shows that Proposed Project truck traffic would use the existing truck routes to access I-215 and would not have an appreciable impact to traffic adjacent to Castleview Arroyo or Sycamore Canyon.

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

Bowles, A.E. 1995. "Responses of Wildlife to Noise." In *Wildlife and Recreationists Coexistence Through Management and Research*, edited by R.L. Knight and K.J. Gutzwiller, 109–156. Washington, DC: Island Press.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

TA

Teresa Alcala < disneymama22@yahoo.com > To: Jeffrey Smith < smith@marchjpa.com >

Tue 7/9/2024 8:45 AM

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, <Teresa Alcala> <92508>

Sent from my iPhone

1-77.1

Teresa Alcala July 9, 2024

I-77.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment for the Meridian air cargo draft EIR

To the March Joint Powers Commission:

I have lived in Riverside's Canyon Crest neighborhood for more than 30 years. During the years that DHL operated out of March Air Reserve Base, my home became virtually unlivable due to the noise created by DHL jets departing the base. The disturbance to neighborhoods caused by commercial air cargo operations at MARB was the subject of a detailed investigative report by attorney Leonard Gumport (https://drive.google.com/file/d/1UvOxcL8fscGDxugKw1hqv7xCiTbAYx79/view). The report revealed that the Globalport developer and JPA staff misrepresented the flight path of jets departing the base. They suppressed the noise study results that showed jets departing the base were likely to awaken thousands of people in nearby neighborhoods.

The Meridian D-1 Gateway Aviation Center draft EIR noise analysis is faulty and does not reflect the noise burden from departures caused by commercial air cargo flights. The draft EIR uses the same analysis used to approve the initial Globalport development, and that methodology has been proven inaccurate. The historical data document the potential for significant commercial jet noise disturbance in densely populated neighborhoods surrounding the base. It is incumbent upon the developer to demonstrate that a tripling of air cargo operations will not deflate property values nor cause a significant decrease in the quality of life for neighborhoods under the actual flight paths used by air cargo operators. This project is abysmal for the March Air Reserve Base and surrounding neighborhoods.

Ole Becker

I-78.1

1-78.2

Ole Becker July 9, 2024

- I-78.1 This comment describes personal experience with the 2005–2008 DHL cargo flights and references a 2006 investigative report prepared for March JPA by attorney Leonard Gumport. The identified DHL cargo flights are no longer occurring. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁶⁰ As of 2024, there were fewer than 20 DC-9s still in service.⁶¹ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁶² The Proposed Project is separate from the 2005–2008 DHL cargo flights.
- I-78.2 This comment generally suggests the aircraft noise methodology used in the EIR is faulty but does not provide any specifics. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. As detailed in EIR Table 3.11-2, the EIR provides existing noise measurements for four locations in surrounding residential areas. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, more distant residential neighborhoods, such as Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a nosier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." 63 As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near other residential neighborhoods.

This comment also raises general concerns regarding aircraft noise and its impacts to housing values, which are not a consideration under CEQA. As discussed in Effects of Aircraft Noise: Research Update

⁶⁰ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

⁶¹ https://simpleflying.com/dc-9-operators-2024/

⁶² https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

on Select Topics,⁶⁴ "[t]he studies of the effects of aviation noise on property values are highly complex owing to the differences in methodologies, airport and community environments, market conditions, and demand variables involved. Whereas most studies concluded that aviation noise effects on property value range from some negative impacts to significant negative impacts, some studies combined airport noise and proximity and concluded that the net effect on property value was positive."

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

National Academies of Sciences, Engineering, and Medicine. 2008. Effects of Aircraft Noise: Research Update on Select Topics. Washington, DC: The National Academies Press. https://doi.org/10.17226/14177.

Air cargo at March Air Reserve Base

LL Loralee Larios<loralee@ucr.edu>
To: Jeffrey Smith <smith@marchjpa.com>

Tue 7/9/2024 7:41 PM

I am writing to request that the March JPA not go forward with the plan to increase commercial air cargo at March Air Reserve Base. The additional truck and plane traffic will add to our already toxic air pollution, traffic congestion, and noise pollution. March ARB does not need this additional traffic, as the home of the new tanker planes it is serving a vital function and is not endangered. However the additional traffic will add to the decline in the quality of life in beautiful peaceful Riverside, particularly beautiful, quiet, idyllic Castleview Arroyo and Sycamore Canyon, wildlife treasures in the heart of the city. Please do not proceed with this plan.

1-79.1

Loralee Larios 1647 Tonia Ct Riverside, CA 92506

Loralee Larios July 9, 2024

I-79.1 The comment expresses general concerns regarding transportation, air quality, and quality of life and does not raise any specific comments, questions, or concerns about the analysis included in the EIR.

Developers are requesting to add dozens of commercial air cargo (i.e. Amazon, UPS, FedEx) flights per day at March Air Reserve Base.

JL Jadie Lee < sjjv@att.net > ...
To: district5@rivco.org; district1@rivco.org; Conder, Chuck < ccon Wed 7/10/2024 2:27 AM

This email is to register my concern and ask you to deny the request to add dozens of commercial air cargo flights to March Air Force Base. I live in Canyon Crest and our neighborhood has already been badly impacted by the expansion of warehouses. Now we are faced with the threat of additional pollution and noise further degrading our quality of life. Please stand up for the citizens of our beautiful neighborhood and vote no on this request.

1-80.1

thank you,

Jadie Lee

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Jadie Lee July 10, 2024

I-80.1 This comment raises general concerns regarding air quality, noise, and quality of life. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Impacts to air quality are addressed in Section 3.2, Air Quality, of the EIR. Noise impacts are addressed in Section 3.11, Noise, of the EIR.

Comment Letter I-81

Re: Draft EIR

Matt Bradley / mjbbds@aol.com <mjbbds@aol.com>
Sun 7/14/2024 4:56 PM
To:Jeffrey Smith <smith@marchjpa.com>

Mr. Smith,

Thank you for the informative program on 07/01/24 at March JPA on Meridian. Also, thanks for extending the "public comment period". I have a couple of questions:

1-81.1

What is the requirement for notification to the public of a meeting ("conversation") by the March JPA or a landlord (potential landlord) concerning the development of March Air Base? How many days prior to the meeting and by what means (newspaper, flyers, etc ...) is the public required to be notified? My wife and I consider ourselves to be informed citizens, but only read about the previous meeting AFTER the meeting. Only NOW are we on your mailing list. I know that there are many more citizens that are concerned about increased air traffic at March. We do not want to have a repeat at March Air Base of the problems with DHL and its total disregard for local residents.

I-81.2

My next questions pertain to "Landlords" that affect any air traffic at March Air Base. This was mentioned at the last meeting. How many "landlords" are there presently at March? And who are they? How many more potential "landlords" are expected? This is important because I believe the total number of civilian flights is locked at 20,000 per year. That is an amount that will inflame the public affected by these flights. Therefore, if this development proceeds as currently planned, there needs to be:

I-81.3

- 1) a document, agreed upon (by a citizen board) written into the lease, limiting the time, number of flights, and flight patterns allowed and
- 2) a more **immediate and robust** response to any violation of these agreed upon limitations. At this point the "landlords" become tenants. I know the "landlords" do not want this written into their (lease ?), but the corporations do not care about the public. If they cared about the public, we would still be allowing DHL at March Air Base.

As a small business owner, I understand the need for wanting this increase in air traffic for business and taxes. However, this does require some appearement to the residents that will be impacted by this increase in air traffic and air pollution. Alternatively, I think there is enough open space to build a dedicated freight terminal in a less populated area that would serve the interests of **both** the corporations and the public.

1-81.4

Thank You for your time,

Matthew J. Bradley

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Response to Comment Letter I-81

Matthew J. Bradley July 14, 2024

- **I-81.1** This is a general introductory comment expressing appreciation for the extension of the public comment period and community meeting held on July 1, 2024. No comments, questions, or concerns about the environmental analysis in the EIR are raised.
- This comment asks questions regarding the requirements for public notification. Public notification for the Proposed Project followed CEQA guidelines. An NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. The public review period for the Initial Study/NOP began on March 31, 2021, and ended on April 29, 2021. During the 30-day public review period of the NOP, March JPA held a scoping meeting on April 14, 2021. The Draft EIR was distributed for 45-day public review from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days to provide time for additional public input (although not required by CEQA). The applicant held community meetings on June 18, 2024, July 1, 2024, and September 24, 2025. All issues and concerns raised in the comments have been fully addressed and analyzed in this Final EIR.
- I-81.3 This comment questions the number of landlords/tenants affecting air traffic at March ARB/Inland Port Airport and requests a citizen board to draft lease requirements related to number of flights, hours of operation, and authorized flight paths. The comment also requests enforcement of any violations. Chapter 2, Project Description, of the EIR has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. These requirements would be enforced through the Mitigation Monitoring and Reporting Program. MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport. No comments, questions, or concerns about the environmental analysis in the EIR are raised.
- I-81.4 This comment discusses the potential economic benefits associated with the Proposed Project and potential alternatives. Chapter 5, Alternatives, of the EIR includes a reasonable range of alternatives that would feasibly attain most of the basic objectives of the Proposed Project but would avoid or substantially lessen any of the significant effects of the Proposed Project.

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Comment Letter I-82

7/17/24, 9:01 AM

Mail - Celeste Sainz - Outlook

Re: Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period

peggy walton <pwtwalton@att.net>

Tue 7/16/2024 3:20 PM

To:Jeffrey Smith <smith@marchjpa.com> Cc:Cindy Camargo <camargo@marchjpa.com>

1 attachments (294 KB)

Comments on MARB Cargo Port Draft EIR July 2024.pdf;

Good afternoon Mr. Smith,

Attached please find my comments and questions about the Draft EIR for the Meridian D-1 Gateway Aviation Center Project.

Thank you for the links sent earlier.

I-82.1

Sincerely, Peggy Walton, Ph.D. Riverside (Canyon Crest) home owner since 1994

On Wednesday, July 3, 2024 at 01:45:20 PM PDT, Jeffrey Smith <smith@marchjpa.com> wrote:

Good Afternoon:

The March Joint Powers Authority (March JPA) has extended the comment period on the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012). The comment period will now end on Monday, July 22, 2024. As noted on the Notice of Availability, the Draft EIR is available for review at the March JPA's office or on the March JPA's webpage at:

• https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

For more information, please refer to the attached notice.

Thank you.

https://outlook.office.com/mail/inbox/id/AAQkADNiYWYwYWNkLWI0NWQtNDYxNi04OTQ3LWU4ODhmZDY2ODYxYgAQAHC22n1wiopIrNICgxn2pJ0...

1/2

7/17/24, 9:01 AM

Mail - Celeste Sainz - Outlook



Principal Planner



14205 Meridian Parkway, Suite 140

Riverside, CA 92518 Phone: (951) 656-7000

Cell: (951) 807-7283 Fax: (951) 653-5558

Email: smith@marchjpa.com
Web: www.marchjpa.com

PLEASE VISIT <u>WWW.MARCHJPA.COM</u> OR CALL (951) 656-7000 FOR MORE INFORMATION. THANK YOU.

https://outlook.office.com/mail/inbox/id/AAQkADNiYWYwYWNkLWI0NWQtNDYxNi04OTQ3LWU4ODhmZDY2ODYxYgAQAHC22n1wiopIrNICgxn2pJ0... 2/2

Page 2 of 12 in Comment Letter I-82

Comment Letter I-82

15 July 2024

To: Jeffrey M. Smith, AICP, Principal Planner

Re: Draft EIR for Meridian D1 Gateway Aviation Center Project

From: Peggy Walton, Ph.D., Canyon Crest homeowner since 1994

In the flyer notifying residents about the Draft EIR for the Air Cargo Center and Off-Site "component", the statement is made that "significant environmental impacts are identified with operational air quality and operational flight noise that are significant and unavoidable. Cumulative impacts associated with operational air quality and operational flight noise and sleep disturbance were also identified as being significant and unavoidable." In reality, the significant impacts have been minimized in the Draft EIR by evaluating the pollution and noise produced by newer planes (Boeing 767) than the actual cargo planes that make up the majority of the fleets of any of the cargo companies being courted (UPS, FedEx, Amazon), most of which are 20-30 yrs. old, noisier planes. Noise contours at 60-64dBA were not measured using data for the actual SKYS4 flight path during climb and turning over Edgemont, Mission Grove, and Canyon Crest neighborhoods with over 30,000 residents in addition to the population of Moreno Valley that lives adjacent to the airport.

Contrary to the way this project is presented in the clearly "pro project" Draft EIR, the significant negative impacts on both air quality and quality of life for residents living near the airport and under the flightpath are avoidable or at least can be decreased. The developers and the JPA must recognize that the Riverside area/Inland Empire continues to have air quality that is worse than any other areas in the United States (well-documented for decades, e.g., American Lung Association). A study conducted by Smart Survey used 12 metrics to measure air quality and the Inland Empire was #1 for the worst total air quality in the U.S. The area that includes Riverside, San Bernardino and Ontario had only 54 "good air days" in the entire year 2023 and experienced 59 days with unhealthy air quality for sensitive groups (children [up to 18 yrs. of age], the elderly, and those with heart and lung diseases)(reported by Austin Turner, KTLA news, posted online May 17, 2024; https://ktla.com/news/local-news/this-area-of-california-hasthe-worst-air-quality-in-the-country-study/). Given the geography of this area, pollutants quickly build to unhealthy levels (https://takano.house.gov/imo/media/doc/environmental report2.pdf). Although air pollution issues are discussed in detail (section 3.2); however, the conclusions are that the operations of this project will provide additional, substantial pollutants, which will delay or prevent the area from ever attaining healthy air quality, and that continuing high levels of air pollution are unavoidable. The mission of MARCH ARB is to support essential military operations. The civilian cargo activities are not essential and elimination of additional operations would reduce air pollution from aviation in this area.

Beyond the healthiest alternative of "no project" listed in section 5, the following combination of operational changes should be considered to decrease the predicted CNEL and air pollution from the project: (1) reduce the total number of new daily cargo operations and do not allow

1-82.2

1-82.3

1-82.4

1-82.5

1-82.6

1-82.7

evening/night operations (none beyond 8 pm), with the penalty of cancelling the tenant agreement if violated; (2) require any tenant to use *only* 767 cargo planes or a new Airbus (currently ordered by Amazon); and (3) provide *only* cleaner aviation fuel alternatives as described by the Department of Energy (https://afdc.energy.gov/fuels/sustainable-aviation-fuel).

1-82.7 Cont.

Specific issues with the text of this Draft EIR are presented in the following paragraphs.

∏ 1-82.8 ∏ 1-82.9

1) Section 3.11, page 5, under Community Response to Noise: The statement is made that "approximately 10% of the population has a very low tolerance for noise and will object to any noise not of their own making."

I-82.10

This sweeping generality lacks any citation or data to support it and conveys a lack of professionalism from a consulting firm that should be presenting an unbiased analysis. Data from a peer-reviewed, published research study are needed to back up this statement that essentially dismisses 10% of the population. The subsequent statement that "Another 25% of the population will not complain even in very severe noise environments dismisses concern for 25% of the population that may be experiencing high levels of stress and serious health effects. Again, there is no data-based support for this "fact" provided in the EIR.

I-82.11

The statement that a 5dB increase in noise is "readily perceptible", citing Caltrans (2013) is related to ground traffic noise, not aviation. The human ability to perceive an increase of 5dB is relative to the background noise level. According to California Public Utilities, "permanent increases in day-night environmental noise levels of more than 5 dBA (Ldn or CNEL) are considered to be substantial". Several studies have shown that aviation noise is more annoying than traffic noise at the same CNEL (see Fidell, 2021), which is not acknowledged in this Draft EIR. "Substantial" is a more appropriate term, especially given that the Draft EIR states that the noise from the proposed operations of this project will be "substantial".

I-82.12

2) The ambient noise measurements made by Urban Crossroads are extremely misleading as they were conducted on May 20, 2020, which was called "typical weekday conditions over a 24-hour period" (p. 3.11-7). Given this was during the pandemic when schools, universities, and businesses were closed, those data cannot be representative of current ambient noise nor noise levels for the near future (e.g., 2027). A footnote acknowledges the COVID-19 pandemic and states "Consequently, ambient noise levels (such as from traffic) *may have been lower* [italics mine] than they otherwise would be": I question the use of "may have been". Clearly those measurements are suspect. The writer concludes that lower ambient noise levels would lead to [calculations of] "a larger projected noise increase from the Proposed Project". However, this EIR is mainly concerned with the CNEL levels, and adding the additional noise from the Proposed Project to inaccurate lower ambient noise levels does NOT give a correct representation of the expected/likely CNEL with the Proposed Project. The neighborhood ambient noise level measurements must be repeated for current conditions.

I-82.13

3) I also question the accuracy of the measurements shown in Tables 3.11-33 and 3.11-34 for the Reference Ambient Noise Levels and the Combined Project and Ambient noise levels, all but one of which are *identical* numbers to a 10th of a dB (there are no units in the table; I assume these are dBA measurements). Federal noise measurement policy generally dictates

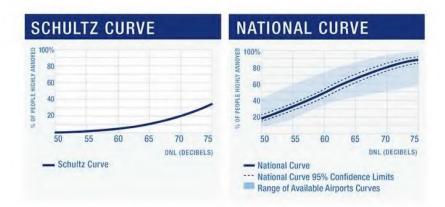
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rounding up; accuracy to tenths of a dB is highly unlikely (e.g., FTA manual). In addition, it is impossible that there is no additional noise if there are cargo flight operations during the daytime and nighttime, especially if the majority of the operations are during the day (average of 34 additional cargo flights). This claim greatly reduces the credibility of the data analyses.

I-82.13 Cont.

4) The nighttime awakenings analysis was done using ANSI Technical Report ASA TR S.12.9-2018/Part 6 (ASA 2018), which became a technical report rather than guidelines due to the inaccuracy of the predictions. In fact, the ASA (2018) report by the Accredited Standards Committee S12 states: "It is also important to note that Equation B.1 is not based on each flyover as an independent event nor is it likely that flyovers are independent. Further, it is not a matter of this Technical Report to determine whether sleep impact should be measured by the number of people awakened or the number of awakenings." It appears that the Draft EIR does just that. The conclusions reached using these equations (Appendix L2), including those for "habituated" residents, are not correct. In addition, Fidell (2015) detailed the issues with relying on FICAN (1992) for predicting annoyance from aviation noise (supporting figures from that paper are included in my Appendix 1). A more recent evaluation of studies correlating the probability of being highly disturbed by nighttime awakenings and noise levels showed 40% probability at 60 dB for aviation noise (Smith et al. 2022) In light of Fidell (2015), Smith et al. (2022) and the FAA (2021) investigation into annoyance from aviation noise (see National Curve below), it is likely that the conclusions presented in this Draft EIR that less than 10% of residents will be annoyed/awakened during the new cargo operations are wrong and ignore the FAA recommendations (also see EPA recommendations in the response to the Draft EIR for the KC-46A). Eliminating any flights after 8pm will prevent awakenings due to the proposed project for children and adults.

I-82.14



5) The use of the Boeing 767 for the noise contour analyses is misleading and grossly underestimates the noise contours. First, the flight path is not complete, repeating the same errors made in the EIR for the DHL cargo facility, which was a nightmare for all residents under the flight path. Actual data collected from FlightAware for the DHL night flights showed their cargo planes turning over homes in Mission Grove, Canyon Crest, and Victoria neighborhoods. The altitude of the fully loaded cargo planes above neighborhoods must be taken into consideration. Note that measurements of Lmax for an A320 at 1400-3700 feet (about the height above homes

1-82.15

Page 5 of 12 in Comment Letter I-82

under the turn) were measured as around 65dBA. A B747 at ~1400 ft has an Lmax of 74dBA (86–92 dBA at take-off, depending on engine type and flap position; FAA, 2012). Given that jets use 85-90% of their rated output during climbing (given 100% on take-off; Fed. Reg. vol. 87(225), 2022 Rules and Regulations, Table 1), 65+dBA noise levels as fully loaded cargo planes turn along the SKYS4 flight path are to be expected, but they have not been considered in this EIR.

I-82.15 Cont.

More appropriate analyses were included in the Final EIR for the KC-46A: see Table 3-1 for Lmax overflight noise levels for 2000 feet during takeoff and landing, which includes some general aviation planes and the military planes that are part of the aviation noise landscape for residents. These values represent the noise levels that cause transient disturbance and *cumulative* annoyance for residents under the flight path. A similar table of data would be appropriate in the Final EIR for the proposed cargo project. Note that a B747 can be louder during take-off than a DC9 or DC10, dependent on the type/age of the engines on the plane (FAA 2012, Advisory Circular 36-3H). If night flights are to be conducted under this project, the 60-64 dBA contour line must be included in the noise contours given the Moreno Valley 60dBA Leq exterior noise standard for nighttime.

1-82.16

Second, at the public meeting in June, we were told that the companies being courted include Amazon, FedEx, and UPS. Their active fleets are readily available online (planespotters.net), and for all three, the Boeing 767 is not the only plane in active use. In addition, the planes used are quite old and, therefore, noisier than newer planes. Amazon is currently using mostly B767s (64% of fleet), but 33% is B737s; they are also using and plan to use more (ordered 8) Airbus 330s. The average age of their fleet is 26.3 yrs. old. The FedEx fleet has only 33.5% B767s (ave. age 5 yrs.), with the remainder of the cargo planes in use being B757s (ave. age 32 yrs.), Airbus 300 (ave. age 29 yrs.), and MD-11s (which have 3 engines; ave. age 31 yrs.). For UPS, the B767 is only 32% of the active fleet; 25.3% are B757s, 17.1% are A300s, 15.3% are B747s, and 10.3% are MD-11s.

1-82.17

The noise generated by the fleets of old cargo planes (20-30 yrs. old) that are currently in use have not been evaluated for their noise contours at MARCH ARB. The baseline data used for the KC-46A EIR were collected for the 2018 AICUZ and do not represent the baseline for current levels of aviation noise (both general aviation and cargo planes). Therefore, this analysis must be redone to truthfully represent all the current activity as a valid baseline.

I-82.18

Given that B767s are less than one-third of the fleet for UPS and FedEx, two-thirds of the potential cargo plane noise sources were not evaluated in this Draft EIR and not included in the predicted CNEL. All potential cargo plane types (B737, B747, B757, B777, MD-11s and see below) must be proportionally added to calculate the actual "average" aviation noise (CNEL) that will be generated during planned operations for an accurate representation of the aviation noise this project will produce. In addition, any noise analyses should require data from fully loaded cargo planes since take-off noise levels increase with heavier loads (FAA 2012, Circular 36-3H). Alternatively, March JPA could require the tenant to use only B767s in the contract with the tenant. The comment in the Draft EIR that if the tenant has other aircraft (not B767s), a new

I-82.19

1-82.20

Page 6 of 12 in Comment Letter I-82

noise study will have to be done is not appropriate. No contract with a tenant should be undertaken unless all activities will comply with the Final EIR for the approved project.

1-82.20 Cont.

Third, it is unclear what the maximum number of daily flights will be each day, 6 days a week, and what day will be our day of relative quiet? Sunday? The Draft EIR states an average of 34 flight events (average of 17 landings and 17 take-offs) with 44 (22 landings and 22 take-offs) per day over the holidays. A range of 5-29 events can give one an average of 17. The Draft EIR should state the following: the maximum number of cargo flights per day that will be permitted 6 days per week for most of the year, and the maximum number of cargo flights per day that will be permitted 6 days a week during the holiday period. The maximum number should be used for all CNEL calculations.

I-82.21

6) The diagrams provided of the cargo facility and the planes in place (e.g., Figures 2-7b, 2-8) show 6 planes with 2 engines (consistent with B767, B777, B737, A320), but the 7th, corner location is a larger plane with 4 engines (consistent with the B747 or Airbus 380). Although clearly indicated in the design and, therefore, clearly expected to use the cargo facility, the noisy 747 was not included in the noise contour analyses. Again, this is a serious omission from the calculations of noise contours and overall noise levels (CNEL) during expected cargo plane operations. It is also unclear how an average of 17-22 cargo planes per day can be handled at this cargo facility given that we were told most of the flights would arrive in the morning and most of the flights would depart in the afternoon or evening. How does that work with only 6-7 bays? It seems likely that plane movements (arrival, departure, or moving from gate to a "parking" spot) will occur throughout the day. Some further explanation of the daily activities at the cargo facility are needed as any movements of planes on the ground is likely to affect residents living adjacent to the new facility unless the planes are being towed between sites. If they are, will all towing vehicles be electric?

1-82.22

1-82.23

I look forward to seeing these issues addressed in the FINAL EIR for the new Cargo Facility and Cargo Operations.

-82.24

Page 7 of 12 in Comment Letter I-82

References:

California Public Utilities. (https://ia.cpuc.ca.gov/environment/info/aspen/cresseygallo/fmnd/5-12 noise.pdf).

FAA (2012) Estimated airplane noise level in A-weighted decibels. Advisory Circular 36-3H. http://www.faa.gov/regulations_policies/advisory_circulars/

FAA (2021) Neighborhood Environmental Survey.

"As part of FAA's ongoing research program on aircraft noise, the Agency conducted a nationwide survey regarding annoyance related to aircraft noise." noise." https://www.faa.gov/regulations_policies/policy_guidance/noise/survey

Fields, J.M. (1992) Effect of Personal and Situational Variables on Noise Annoyance: With Special Reference to Implications for En Route Noise. Final Report, DOT/FAA/EE-92/03. NASA.CR-189676

Fidell, S. (2015) A Review of US Aircraft Noise Regulatory Policy. Acoustics Today, 11(4):26-34 [Figs. 3,4, 5 see Appendix 1]

FTA transit noise assessment manual (2018).

https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123 0.pdf

1-82.25

NASA (1980) Noise prediction validation. Final Report. NASA CR-159333 [B. N. Shivashankara, Boeing Airplane Company, Seattle, Washington] https://ntrs.nasa.gov/api/citations/19800025711/downloads/19800025711.pdf

"A flight test program designed to minimize the above problems and to obtain high quality noise data was conducted by the Boeing Commercial Airplane Company in 1977. These tests were performed with a "clean airplane configuration," that is, with gear up and minimum flaps (20°), to reduce airframe noise. The airplane was flown over a linear array of ground plane microphones at nominally constant altitude, attitude, and power setting. A wide range of power settings was tested, from flight idle to full-power takeoff. The following sections provide a detailed description of the test site, instrumentation, data acquisition, and data reduction procedures. The test program, as far as is known, is unique and is believed to provide data of high quality to be used in assessing the flight component noise levels for high bypass ratio engines ... A Boeing 747-100 airplane equipped with four Pratt & Whitney Aircraft JT9D engines was utilized."

Smith, M.G., et al. (2022). Environmental Noise and Effects on Sleep: An Update to the WHO Systematic Review and Meta-Analysis. Environmental Health Perspectives 130(7) July 2022. https://doi.org/10.1289/EHP10197

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Appendix 1

Illustrations from Fidell, S. (2015) A Review of US Aircraft Noise Regulatory Policy. Acoustics Today, 11(4):26-34

"National aircraft noise regulatory practices rarely succeed in accurately predicting or securing public acceptance of aircraft noise exposure in airport-vicinity communities."

"The FICON dosage-response relationship accounts for only about a fifth of the variance in the relationship between aircraft noise exposure and the prevalence of high annoyance in communities, and virtually none of the variance in the range of greatest regulatory interest: 55 $dB \le Ldn \le 65 dB$ ". [note: Ldn = CNEL]

"Figure 3 illustrates the enormous variability in annoyance prevalence rates of residential populations in different communities. Each of the 500+ open circles represents an empirical field measurement of the prevalence of aircraft noise-induced annoyance."

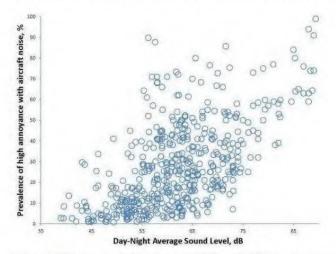


Figure 3. Illustration of the great variability in field measurements of aircraft noise-induced annoyance prevalence rates in approximately 550 communities.

1-82.26

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"Figure 4 shows that the FICON fitting function falls far short of the centroid of this cloud of data points. As such, it fails to explain or otherwise account for the great majority of the variance in the relationship."

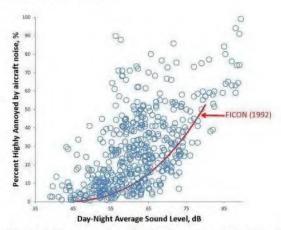


Figure 4. Summary of worldwide observations of the prevalence of all transportation noise-induced annoyance. The solid curve in the figure is a dosage-response relationship relied on in the United States to predict annoyance prevalence rates in all communities to all transportation noise sources.

Figure 5 illustrates the differences between FICON (1992) and the latest analysis of the prevalence of high annoyance due to aircraft noise exposure of Annex F of the ISO Final Draft of International Standard 1996-1. At the same aircraft noise-exposure levels, the modern (red) function reveals that considerably greater percentages of residential populations are highly annoyed by aircraft noise exposure than predicted by **the obsolete (blue) function**.

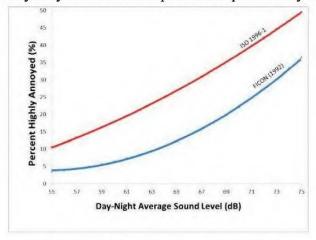


Figure 5. Comparison of FICON (1992) and International Organization for Standardization (ISO; 1996-1) predictions of aircraft noise-induced percentages of high annoyance for a community of average tolerance for aircraft noise.

I-82.26 Cont.

Page 10 of 12 in Comment Letter I-82

7/17/24, 9:01 AM

Mail - Celeste Sainz - Outlook

Re: Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period

peggy walton <pwtwalton@att.net>

Tue 7/16/2024 3:20 PM

To:Jeffrey Smith <smith@marchjpa.com> Cc:Cindy Camargo <camargo@marchjpa.com>

1 attachments (294 KB)

Comments on MARB Cargo Port Draft EIR July 2024.pdf;

Good afternoon Mr. Smith,

Attached please find my comments and questions about the Draft EIR for the Meridian D-1 Gateway Aviation Center Project.

Thank you for the links sent earlier.

1-82.27

Sincerely, Peggy Walton, Ph.D. Riverside (Canyon Crest) home owner since 1994

On Wednesday, July 3, 2024 at 01:45:20 PM PDT, Jeffrey Smith <smith@marchjpa.com> wrote:

Good Afternoon:

The March Joint Powers Authority (March JPA) has extended the comment period on the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012). The comment period will now end on Monday, July 22, 2024. As noted on the Notice of Availability, the Draft EIR is available for review at the March JPA's office or on the March JPA's webpage at:

• https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

For more information, please refer to the attached notice.

Thank you.

https://outlook.office.com/mail/inbox/id/AAQkADNiYWYwYWNkLWI0NWQtNDYxNi04OTQ3LWU4ODhmZDY2ODYxYgAQAHC22n1wiopIrNICgxn2pJ0...

Page 11 of 12 in Comment Letter I-82

7/17/24, 9:01 AM

Mail - Celeste Sainz - Outlook



Principal Planner



14205 Meridian Parkway, Suite 140

Riverside, CA 92518 Phone: (951) 656-7000

Cell: (951) 807-7283 Fax: (951) 653-5558

Email: smith@marchjpa.com
Web: www.marchjpa.com

PLEASE VISIT <u>WWW.MARCHJPA.COM</u> OR CALL (951) 656-7000 FOR MORE INFORMATION. THANK YOU.

https://outlook.office.com/mail/inbox/id/AAQkADNiYWYwYWNkLWI0NWQtNDYxNi04OTQ3LWU4ODhmZDY2ODYxYgAQAHC22n1wiopIrNICgxn2pJ0... 2/2

Page 12 of 12 in Comment Letter I-82

Response to Comment Letter I-82

Peggy Walton July 15, 2024

- **I-82.1** This comment is a transmittal email. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-82.2 This is a general comment regarding public notification and significant impacts identified in the EIR. However, the EIR determined the Proposed Project would have a less-than-significant effect regarding sleep disturbance. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-82.3 This comment alleges the EIR minimized the Proposed Project's noise impacts by evaluating the noise generated by Boeing 767 aircraft, rather than an older fleet mix. Because there is no proposed tenant at this time, the EIR analyzed proposed flight operations scenarios reflecting a fleet of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval.
- I-82.4 This comment questions the flight path that was analyzed in the EIR. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." 65 As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest.

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

- I-82.5 This comment raises concerns about the Proposed Project's impact to the region's air quality and adverse health conditions. Section 3.2, Air Quality, of the EIR discusses the climate of the South Coast Air Basin and how it impacts the dispersion of pollutants and the existing air quality. Details on the improvement of air quality despite the continued growth of the region is provided in the Air Quality Technical Report, Appendix B-1 to the EIR. Specifically, Section 2.8 of the Air Quality Technical Report highlights the improvements of air quality with respect to O₃, PM₁₀ and PM _{2.5}, CO, and TACs. Section 3.2 of the EIR discusses the 2022 SCAQMD Air Quality Management Plan and how it builds on measures already in place to control emissions and proposes new control strategies such as zero-emission technologies, low NO_x technologies, and other best management practices to reduce emissions and achieve federal O₃ standards. MM-AQ-4 (Truck Requirements) through MM-AQ-6 (Additional Air Quality Tenant Requirements) include many of the strategies to help encourage cleaner vehicles and reduce stationary source emissions. SCAOMD has adopted Rule 2305, Warehouse Indirect Source Rule, to reduce NO_x and diesel particulate matter emissions from warehouses greater than 100,000 square feet. The Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from operations. As shown in Table 3.2-16 of the EIR, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
- I-82.6 This comment proposes eliminating civilian aircraft operations and only allowing military operations at March ARB. March ARB/Inland Port Airport is a joint use airport, where facilities are owned and operated by DAF and made available for civilian aviation. The Joint Use Agreement sets forth the terms, which safeguard the March ARB military mission. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-82.7 This comment suggests future tenant operational conditions related to flight numbers, hours of operation, and fleet mix. As discussed in Chapter 2, Project Description, there is no proposed tenant at this time. However, as a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by MIPAA for conformance with this EIR: non-conformance may require additional CEOA review. MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m. Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

This comment further suggests future tenant operational conditions, including requiring only alternative aviation fuels. The Proposed Project does not have control over the fuel provided to the site, as fuel used by the Proposed Project will be provided through the existing off-site MIPAA aircraft fuel farm. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

I-82.8 This comment questions the support for the percentages identified in Section 3.11 of the EIR, specifically under the subheading "Community Response to Noise." The referenced discussion in the EIR relies on the Project Noise Impact Analysis (Appendix L-1 of the EIR), which supports these statistics with information from the Noise Effects Handbook – A Desk Reference to Health and Welfare Effects of Noise by the EPA Office of Noise Abatement and Control (revised 1981). As explained in the 2018 FTA Transit Noise and Vibration Impact Assessment Manual:66

In 1978, Theodore J. Schultz, an internationally known acoustical scientist, synthesized the results of a large number of social surveys concerning annoyance due to transportation noise. A group of these surveys were remarkably consistent, and the author proposed that their average results be taken as the best available prediction of transportation noise annoyance. This synthesis has received essentially unanimous acceptance by acoustical scientists and engineers. The "universal" transportation response curve developed by Schultz (Figure 3-7 [represented in this response as Exhibit II.6-1]) shows that the percent of the population highly annoyed by transportation noise increases from zero at an L_{dn} of approximately 50 dBA to 100% when Ldn is approximately 90 dBA. Most importantly, this curve indicates that for the same increase in Ldn, there is a greater increase in the number of people highly annoyed at high noise levels than at low noise levels. For example, a 5 dB increase at low ambient levels (40-50 dB) has less impact than at higher ambient levels (65-75 dB). A recent update of the original research containing several railroad, transit, and street traffic noise surveys, confirming the shape of the original Schultz curve.

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FTA (Federal Transit Administration). 2018. Transit Noise and Vibration Impact Assessment Manual. September 2018.

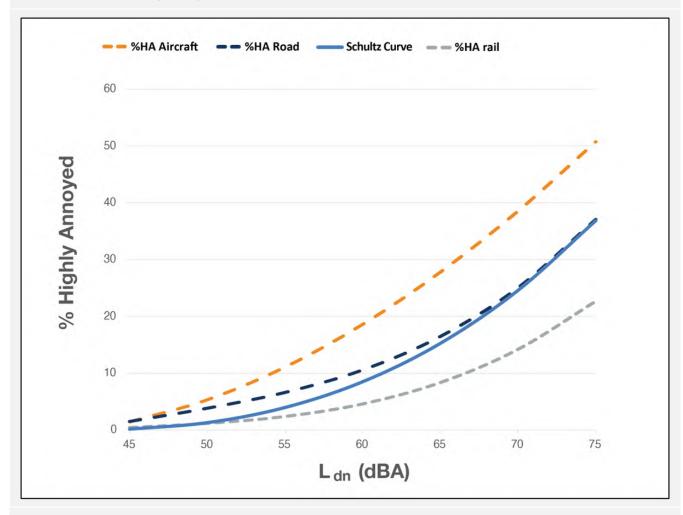


Exhibit II.6-1. Community annoyance due to noise.

Source: Schultz, T.J. (1978). "Synthesis of social surveys on noise annoyance." Journal of the Acoustical Society of America, 64(2): 377-405.

The EIR acknowledges that 10% of the population has a very low tolerance for noise and is thus likely very sensitive to noise and will correspondingly react. Regarding the quarter of the population that may not complain even under severe noise environments, the universal Schultz curve appearing in Exhibit II.6-1 shows that up to 75% of a population would be highly annoyed (and thus likely to react) at an exterior noise level of about 87 dBA, but a remaining 25% of the population would not be highly annoyed and may thus not react.

I-82.9 This comment questions Section 3.11 of the EIR's description of a 5 dB increase in noise as being "readily perceptible" and states it should instead be described as substantial. The discussion that the comment references is a part of an explanation of how people and communities perceive and react to noise. As explained in Section 3.11.4, Thresholds of Significance, "FICON identifies that a project-related operational noise increase of 5 dB or greater is typically interpreted as a readily perceptible change and would be considered a significant impact." Further, Table 3.11-25 identifies a 5 dB or

greater increase, if ambient levels are less than 60 dBA L_{eq}, as a significant impact; for higher ambient levels, smaller increases would constitute a significant impact.

The comment further alleges a 5 dB increase in noise relates only to ground traffic noise and not aviation noise. The EIR supports this discussion with reference to the Caltrans 2013 Technical Noise Supplement, specifically Table 2-10, which indicates that a +5 dB noise change is described as a readily perceptible increase and makes no clarification or distinction with respect to type of sound (i.e., aviation or non-aviation). The comment also asserts, citing Fidell (2015), that aviation noise is more annoying than traffic noise at the same CNEL. Annoyance is not the context for aviation noise impact assessment as studied in the EIR, which applies March ARB/Inland Port Airport ALUCP, Policy MA 2.3(a), standards as described in EIR Table 3.11-25.

- I-82.10 This comment questions the usage of ambient sound levels measured in May 2020 (Table 3.11-2 of the EIR) due to pandemic conditions and asserts they must be repeated to accurately reflect post-COVID conditions. In fact, the L5 position was measured in February 2021 and thus during a time when many (if not all) of the initial COVID response health orders had been lifted and corresponding traffic volumes were back to normal. The ambient noise levels at L5 are comparable to those measured at L1-L4. The commentor also remarks on these 2020-era measurement samples being used for the CNEL-based assessments. Tables 3.11-33 and 3.11-34 of the EIR, which are part of the Proposed Project's operational noise assessment, use the daytime and nighttime samples to evaluate increases during associated hours—not 24-hour periods; hence, if the 2020-era samples were measurably lower than what would be collected during pre- or post-COVID conditions, then their usage in this manner would be conservative, since these two tables evaluate decibel increase over ambient as a result of adding Project operation noise logarithmically to a plus-Project ambient level. A lower pre-Project ambient level means these decibel increases would be higher and were still found to be less than significant. Roadway traffic noise and aviation noise assessments using CNEL as the applicable metric as presented in the EIR do not rely on these sample outdoor ambient measurements, but instead depend upon corresponding roadway traffic noise model and aviation noise model scenarios with existing conditions based on the EIR Traffic Analysis (Appendix M-1 of the EIR) and the KC-46A EIS.
- I-82.11 This comment questions the accuracy of measurement data applied in Tables 3.11-33 and 3.11-34 of the EIR, as well as the presentation of 0.0 dB as the Proposed Project-attributed increase in the outdoor ambient noise level. The data in these tables, as stated in table note "d" in each table, comes from Table 3.11-2. As the paragraph preceding Table 3.11-33 describes, the reference ambient noise levels are measurement values from survey locations nearest to the studied receptor positions. The usage of 0.0 dB as the predicted Project increase is a consequence of rounding after the mathematical computation. The logarithmic combination of the predicted total Proposed Project operational noise (Ltpon) level and the reference ambient (Lramb) noise level results in a sound level that is virtually the same as the latter; hence, the arithmetic difference between this combined project and ambient (Lcpaa) logarithmic sum and the reference ambient level (Lramb) is very small. For illustration purposes, the Proposed Project increase calculation for R4 in Table 3.11-33 is rounded to 0.0 from 0.02994 as follows:

Project increase = L_{cpaa} - L_{ramb}, where L_{cpaa} = 10 × LOG(10^[Ltpon/10]+10^[Ltamb/10])

Daytime Proposed Project increase at R4 = 58.52994 - 58.5 = 0.02994 dB ≈ 0.0 dB

Rounding the value up to 0.1 dB would not change the impact finding for R4 or any of the other studied receptors in Tables 3.11-33 and 3.11-34.

I-82.12 This comment observes that ANSI Technical Report ASA TR S.12.9-2018/Part 6 was used for calculating nighttime awakenings and asserts the conclusions are incorrect. Research by Fidell (2015), Smith et al (2022), and the FAA are mentioned as support for an assertion that a 10% sleep awakening probability due to the Proposed Project is wrong. However, page viii of ANSI Technical Report ASA TR S.12.9-2018/Part 6 states in the introduction: "by itself, the newly available information offers no unambiguous basis for revising the 2008 Standard." On page 1, the report states: "two Informative Annexes of the 2008 standard are included in this document for the guidance they can provide until more plausible and technically defensible means are developed for predicting sleep disturbance due to transportation noise." These statements provide adequate support to use the equations B.1 and C.1 from the two Informative Annexes mentioned on page 1; this was done in Appendix L-2 of the EIR, with results summarized in EIR Table 3.11-57. As described on page 3.11-33 of the EIR, the application of a 10% probability as an appropriate threshold against which to assess impacts at night from 10:00 p.m. to 7:00 a.m. comes from a 2023 FAA sleep study started by Basner et al. 99

However, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. Further, Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III of this Final EIR for details.

- I-82.13 This comment questions the use of the Boeing 767-300 as the standard plane analyzed and references maximum sound levels (L_{max}) of a variety of aircraft types and altitude ranges. Because there is no proposed tenant at this time, it would be speculative to attempt to forecast the ultimate aircraft fleet mix. Therefore, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Further, the aviation noise assessments are made with respect to CNEL, which is a derived metric based on a 24-hour period—not an L_{max} value from a single aircraft overflight.
- I-82.14 The comment suggests that L_{max} overflight noise levels included in the January 2024 KC-46A EIS were "more appropriate" and would be so in the Final EIR of the Proposed Project. Doing so would not be consistent with the CNEL-based assessment presented for aviation noise in the EIR. The comment also

⁶⁷ ASA (Acoustical Society of America). 2018. Technical Report ASA TR S12.9-2018/Part 6: Rationale for Withdrawing S.12.9-2008/Part 6 Methods for Estimation of Awakenings Associated with Outdoor Noise Events Heard In Homes. Prepared by ANSI-Accredited Standards Committee S12 and Registered with ANSI.

⁶⁸ ASA 2018.

Basner, M., I. Barnett, M. Carlin, G.H. Choi, J.J. Czech, A.J. Ecker, Y. Gilad, T. Godwin, E. Jodts, C.W. Jones, M. Kaizi-Lutu, J. Kali, J.D. Opsomer, S. Park-Chavar, M.G. Smith, V. Schneller, N. Song, and P.A. Shaw. 2023. "Effects of Aircraft Noise on Sleep: Federal Aviation Administration National Sleep Study Protocol." International Journal of Environmental Research and Public Health 20(21): 10.3390/ijerph20217024. https://www.mdpi.com/1660-4601/20/21/7024.

conjectures that if night flights are conducted, "a 60-64 dBA contour line must be included in the noise contours given the Moreno Valley 60 dBA L_{eq} exterior noise standard for nighttime." However, as shown in Table 3.11-25 of the EIR, and as supported by Section 11.80.030.E.3 of the Moreno Valley Municipal Code, such a standard does not apply to aviation noise. However, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. Further, Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III of this Final EIR for details.

- I-82.15 This comment is in regard to existing cargo operators' fleet composition. Because there is no proposed tenant at this time, it would be speculative to attempt to forecast the ultimate aircraft fleet mix. Therefore, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval.
- I-82.16 This comment claims the noise from fleets of "old cargo planes" that "are currently in use have not been evaluated for their noise contours" at March ARB, and the baseline must be re-analyzed. Figure 3.1 from the KC-46A Revised Draft EIS (January 2024) depicts contours that include baseline aviation noise levels that were used to inform Figure 3.11-3 in the EIR, as well as, for reference, a 65 dBA CNEL contour from the 2018 AICUZ. As described in Section 4.4.1, Noise Contour Assumptions, of the 2018 AICUZ, its contours assume "March JPA would operate at their maximum annual allocation of 21,000 aircraft operations," which helps explain why its 65 dBA CNEL contour extends further—it represents this maximum flight operations under consideration, which may or may not be greater than the actual current baseline exhibited at March ARB. For these reasons, the EIR utilized the latest available information for describing a baseline aviation noise environment, which is suitable for the aviation noise impact assessment attributed to the Proposed Project.
- I-82.17 This comment again questions the EIR's use of the Boeing 767 for analysis purposes and references existing cargo operators' fleet composition. Because there is no proposed tenant at this time, it would be speculative to attempt to forecast the ultimate aircraft fleet mix. Therefore, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval.
- I-82.18 This comment disagrees with the use of a future noise study to confirm that the ultimate tenant's fleet mix is consistent with the EIR analysis and instead requests the tenant be required to utilize only Boeing 767 aircraft. This is unnecessarily restricting. A future tenant may have an aircraft fleet quieter than

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March ARB. 2018. Final Air Installations Compatible Use Zones Study March Air Reserve Base. February 2018. Accessed June 18, 2020. https://www.march.afrc.af.mil/Portals/135/documents/MARCH_AICUZ_2018.pdf?ver=2018-02-21-161029-473.

the Boeing 767-300. If a noisier fleet were proposed, additional environmental review would be required as part of a discretionary action to revise the conditions of approval.

- I-82.19 This comment raises concerns that Chapter 2 of the EIR discusses average flights per day but is not clear as to the maximum number of flights per day. Chapter 2 of the EIR has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR.
- I-82.20 This comment raises concerns regarding the aircraft depicted on various EIR figures, including Figure 2-5, Site Plan: Air Cargo Center Component. Because there is no proposed tenant at this time, the proposed flight operations scenarios analyzed in the EIR reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. The EIR figures depicting the incorrect aircraft have been corrected. These revisions do not constitute new information under CEQA and does not impact the environmental analysis in the EIR.
- I-82.21 This comment questions the logistics of arrivals and departures with the cargo building's seven "bays." As explained in Chapter 2, Section 2.4.2, Project Operations, of the EIR: "Generally, arrivals would occur in the early morning hours and departures would occur in the late evening hours." The actual arrivals, departures, and handling of air freight cargo on a given day may or may not occur in a manner where all seven occupied bays would need to be vacated to accept new aircraft. Some bays may experience more frequent aircraft quantities, while others might see less.
- **I-82.22** This comment provides a closing statement. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-82.23** This comment provides a number of noise-related references. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-82.24** This comment also provides a number of noise-related references. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Comment Letter I-83

Chelsea Ohanesian

From:

Chris Bardeen <cbardeen951@gmail.com>

Sent:

Sunday, July 14, 2024 1:12 PM

To:

Jeffrey Smith

Subject:

Comments on Draft EIR for Meridian Gateway

Attachments:

Comments on EIR-07-14-2024.pdf

Dear Mr. Smith,

please find attached my comments with questions highlighted in bold. Thanks for your help and community outreach efforts,

1-83.1

Chris Bardeen

Jeffrey M. Smith, AICP Principal Planner March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, CA 92518 July 14, 2024

Dear Mr. Smith,

Please find below my comments on the Draft Environmental Impact Report for the Meridian D1-Gateway Avigation Center project, SCH No. 20210400012. I have tried to organize my comments by sections, with some explanations, and my specific questions are in bold.

I should say that my own personal experience from 2005-2008 was that night-time cargo flights were very disruptive. Our young children (ages 4 and 6 in 2008) were routinely awakened by DHL cargo flights during that period. Many other long-time residents had similar experiences and are determined not to risk it again.

1-83.2

Thank you for your consideration,

Chris Bardeen 238 Gracefield Way Riverside, CA 92506 Cbardeen951@gmail.com

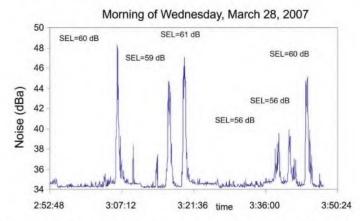
- 1) As written, Appendix L-2 is effectively useless for trying to understand the Environmental Impacts. Below I summarize some of the technical issues in the form of questions:
 - 1.A) Why are the mathematical equations not labeled?
 - 1.B) Why are the variables in equations (e.g. Z, LAE) not defined?
 - 1.C) Why is no mathematical procedure for using SEL levels to calculate awakening probability provided?
 - 1.D) Why do the tables of probabilities switches from % to decimal randomly?
 - 1.E) Why are some probabilities in Appendix tables are greater than 1.0, which is mathematically impossible?
 - 1.F) Why is Appendix Table 9 full of #NUM! symbols instead of numbers?
 - 1.G) Why do the Table headings refer to Equations B.1 and C.1, which cannot be found anywhere in the Appendix?
 - 1.H) Why are some awakening probabilities for Habituated and New residents 1000 times different for the same event? This makes no physical sense.
 - 1. I) Different models of the same jet (e.g. 737) can have different noise levels, with older models commonly used in cargo flights being noisier. Why was no attempt made to model other jets, for example 737s or 747s, that are commonly used in cargo operations?

1-83.3

1

Page 2 of 6 in Comment Letter I-83

- 2) Addressing the problems in 1) above is needed just to make L-2 understandable. Even after it becomes interpretable, I still doubt that the analysis will be valid. Below are some of the conceptual and methodological questions I have with Appendix L-2.
 - 2.A) The SEL=85 contour map is inadequate since previous experience has shown that SEL levels of 70 or greater can be observed in Mission Grove, Canyon Crest and Orangecrest. Note that these neighborhoods have higher elevations than March and homes are closer to the flight paths vertically. Why were single event noise levels in Mission Grove, Canyon Crest, or Orangecrest not considered?
 - 2.B) Multiple night flights increase the total probability of awakening and increase the impact. For example, if the probability of awakening is 0.1 for one flight, after 5 flights it will be 0.4 (under the most optimistic assumptions). Why was no estimate of total awakening probability after consecutive flights attempted?
 - 2.C) The noise analysis relies only on computer models that were validated against each other, not real life. An example of such real-life data is given below (taken in a Mission Grove bedroom with all windows shut, subject to 6 cargo flights between 2:52 am and 3:50 am) shows:



Why was there no attempt to analyze (or even acknowledge) the historical SEL noise levels and awakenings due to night flights from March from 2005-2008?

2.D) There is a lot of variability for a flight that follows the Skyes4 departure from March. A "tight" turn takes jets over Orangecrest, while a "loose" turn takes them over Canyon Crest. A heavily loaded jet will gain less altitude than a lightly loaded jet. This variation in flight paths distributes the noise over a much larger population than considered here. Why was no attempt made to analyze the effects of varied flight paths out of March and how they affect different neighborhoods?

I-83.3 Cont.

2

Page 3 of 6 in Comment Letter I-83

3) The EIR states that the project will have no impact on Housing. However, if we look back at 2005-2008, we can expect a significant impact on house prices. I compared the periods 2-1-06 to 9-1-06 (before noise) and 2-1-07 to 9-1-07 (after noise). Below are the results, in \$/square foot:

Neighborhood	Before Noise	After Noise	% Decline
Wood Streets	\$287.91	\$277.47	3.6%
Mission Grove	\$259.88	\$231.63	10.9%
Victoria Woods	\$266.09	\$252.38	5.1%

Prices in Mission Grove declined roughly twice as much as in surrounding neighborhoods that were not impacted by aircraft noise. The decline in Mission Grove was sudden and corresponded to when flights were routed north out of March around 11-2006. In previous months, take-offs were routed south over Perris and Menifee, due to "runway repairs". Multiple noise complaints from those communities were recorded as well. The negative real estate "hit" is well-documented in the scientific literature as well.



1-83.4

- 3.A Why was there no attempt to quantify the impact of the new aircraft operations on real estate prices in the surrounding neighborhoods?
- 3.B If we assume that there will be 10,000 affected residences, with an average value of \$600,000, a 5% decline in home value leads to an estimate of \$300,000,000 in lost home equity. These are rough numbers but serve to illustrate the magnitude of possible financial losses to residents. It is unlikely that the economic benefit of the Avigation facility will come close to this number. Why was there no economic cost-benefit analysis performed to determine if this project will be a net loss/gain for residents of Riverside County?

3

4) In the main EIR, the section on Community Response to Noise (p. 483) discusses "the level of community annoyance" and lists relevant factors:

Fear associated with noise-producing activities
Socioeconomic status and educational level
Perception that those affected are being unfairly treated
Attitudes regarding the usefulness of the noise-producing activity
Belief that the noise source can be controlled

Absent is any acknowledgement that environmental noise, and especially aircraft noise, can lead to measurable health effects. Noise (both continuous as measured by CNEL and bursts as measured by SENEL) has well-documented negative effects on physical and mental health. A 2017 study ("Aviation Noise Impacts: State of the Science," https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5437751/) states, "Aircraft noise is one, if not the most detrimental environmental effect of aviation. It can cause community annoyance, disrupt sleep, adversely affect academic performance of children, and could increase the risk for cardiovascular disease of people living in the vicinity of airports."

1-83.5

A 2022 study ("Impact of aeroplane noise on mental and physical health: a quasi-experimental analysis," https://bmjopen.bmj.com/content/12/5/e057209) found that "We found that increased exposure to aeroplane noise was associated with a significant increase in insomnia across all age groups, but particularly in children ages 5–17 (OR=1.64, 95% Cl=1.12 to 2.39). Cardiovascular disease increased significantly both among 18–44-year-old (OR=1.45, 95% Cl=1.41 to 1.49) and 45–64-year-old Medicaid recipients (OR=1.15, 95% Cl=1.07 to 1.25). Substance use and mental health-related emergency department visits also increased. For ages 5–17,rate ratio (RR) was 4.11 (95% Cl=3.28 to 5.16); for ages 18–44, RR was 2.46 (95% Cl=2.20 to 2.76); and for ages 45–64, RR was 1.48 (95% Cl=1.31 to 1.67)."

- 4.A Given the large amount of scientific evidence available, why were possible health effects on the population not considered in this EIR?
- 4.B What is the estimated impact of night flights on the health issues listed above (insomnia, cardiovascular disease, substance abuse, mental health)?

1-83.6

4

Page 5 of 6 in Comment Letter I-83

5) The EIR states (p. 536) that, "March JPA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types." The scenarios presented in the EIR are either no flights or the full requested amount of 17 per day with several at night. However, there are many examples of airports that regulate flying hours and traffic, either by management or due to public pressure. Examples in California include: Burbank: https://www.hollywoodburbankairport.com/noise/noise-rules-summary/ 1-83.7 Orange County: https://www.ocair.com/business/general-aviation/pilotinformation/noise-abatement/ Oakland: https://www.cbsnews.com/sanfrancisco/news/faa-plan-to-shift-air-trafficpatterns-over-east-bay-gets-dropped-following-outcry/ 5.A Why did the EIR not consider other scenarios in which the number, types, and hours of operation could be regulated? 6) Appendix M1.1 describes the expected impact on traffic. Similar to Appendix L-2, there are numerous typos and oversights. 1-83.8 6.A) Pages 148-156, 162, 164-166, 861, 1021, 1026, 1030, 1289-1290, 1294, 1299, 1997, 2000, 2069, 2072, and possibly several others are inserted into the document upside-down, which makes it difficult to read. Why are multiple pages inserted upside-down? 6.B) Several tables (page 872, 876m 877) have entries filled with #DIV/0! Instead of a number. What are the numbers that should appear in these tables? Does 1-83.9 this indicate a problem with the Excel Spreadsheet used to generate these numbers? 6.C) Currently, there is overflow traffic from the I-215 that takes a shortcut through Riverside on Allesandro. Was overflow traffic through Riverside taken into 1-83.10consideration for the traffic impacts?

5

Response to Comment Letter I-83

Chris Bardeen July 14, 2024

- **I-83.1** This comment is a transmittal email. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **I-83.2** This is a general introductory comment. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

This comment also raises concerns regarding the negative impacts of the 2005–2008 DHL cargo flights. The Proposed Project is separate from the 2005–2008 DHL cargo flights. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁷¹ As of 2024, there were fewer than 20 DC-9s still in service.⁷² Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁷³

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III, Errata, of this Final EIR for details.

- I-83.3 This comment raises concerns regarding the sleep disturbance report, Appendix L-2, of the EIR. The applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m. Please refer to Chapter III of this Final EIR for details. Therefore, there is no need to evaluate sleep disturbance under March JPA's threshold. The comment raises 13 questions that are addressed as follows and in like order:
 - 1.A. There is no requirement for the report equations to be labeled.
 - 1.B. Section 3 of Appendix L-2 describes that the two equations (and their corresponding variables) come from the ANSI Technical Report ASA TR S12.9-2018/Part 6 section Rationale for Withdrawing S.12.9-2008/Part 6. This technical report provides the rationale to withdraw the recommendations for the Methods for Estimation of Awakenings Associated with Outdoor Events Heard in Homes. The Technical Report can be found online here: https://www.inforstreet.com/wp-content/uploads/pdfs/preview/2022159.
 - 1.C. Section 3 of Appendix L-2 describes the methodology applied for predicting sleep disturbance probabilities, which includes the two provided mathematical expressions. As defined in Annex B of the ASA TR S12.9-2018/Part 6, an A-weighted sound exposure level (ASEL or LAE) is included as a dependent variable of "Z" and per Annex C is included in the expression to calculate the probability as well.

⁷¹ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

⁷² https://simpleflying.com/dc-9-operators-2024/

¹³ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base

- 1.D. These are not "switches" from a percentage format to a decimal format. The values appearing in decimal format are in fact percentages, with many such values being much lower than 1% given the modest SEL input values.
- 1.E. Per the above response to question 1.D above, these are percentage values.
- 1.F. As the footnote to Appendix Table 9 in Appendix L-2 explains: "The SEL values have to be above 45.0 dBA SEL for the Contour and Percent of New Population Potentially Awakened equation to work." Cells with #NUM! are less than 45.0dBA SEL.
- 1.G. Equations B.1 and C.1 are found in Annex B and Annex C of the ASA TR S12.9-2018/Part 6 and are the untagged expressions to calculate "PA,single" in Appendix L-2.
- 1.H. The difference in awakening probabilities between "habituated" and "new" residents is a consequence of the two expressions presented in Annexes B and C, respectively, in the ASA TR S12.9-2018/Part 6.
- 1.I. As described in Section 4.1 of Appendix L-2, the Boeing 767-300 model is considered "representative of the aircraft type anticipated to be used for this Project."
- 2.A. The Mission Grove, Canyon Crest, and Orangecrest neighborhoods did not fall within the parameters of the sleep disturbance model as described in Section 4.1 of Appendix L-2.
- 2.B. An estimate of total awakening probability after consecutive flights, as posed by the comment, is not consistent with the methodology used in Appendix L-2, which relies upon the ASA TR S12.9-2018/Part 6.
- 2.C. The EIR and Appendix L-2 evaluated sleep awakening probabilities at the studied receptor positions and in consideration of Proposed Project parameters, such as the anticipated aircraft type (B767-300) and the flight paths as described in Appendix L-2. As explained in Response I-83.2, above, the Proposed Project is separate from the 2005–2008 DHL cargo flights.
- 2.D. The Mission Grove, Canyon Crest, and Orangecrest neighborhoods did not fall within the parameters of the sleep disturbance model as described in Section 4.1 of Appendix L-2.
- This comment is in regard to impacts on housing prices, which is not required to be analyzed by CEQA. As explained in Response I-83.2, above, the Proposed Project is separate from the 2005–2008 DHL cargo flights. As discussed in Effects of Aircraft Noise: Research Update on Select Topics, 74 "[t]he studies of the effects of aviation noise on property values are highly complex owing to the differences in methodologies, airport and community environments, market conditions, and demand variables involved. Whereas most studies concluded that aviation noise effects on property value range from some negative impacts to significant negative impacts, some studies combined airport noise and proximity and concluded that the net effect on property value was positive."

National Academies of Sciences, Engineering, and Medicine. 2008. Effects of Aircraft Noise: Research Update on Select Topics. Washington, DC: The National Academies Press. https://doi.org/10.17226/14177.

The comment further questions the economic benefit to Riverside County. As discussed in Chapter 2, Project Description, one of the objectives of the Proposed Project is to "Provide increased job opportunities for local residents through the provision of employment-generating businesses." According to the applicant, the Proposed Project will have a project labor agreement with local unions. The Proposed Project is anticipated to generate approximately 150 permanent employment opportunities. It is anticipated that these new jobs would be filled by the existing residential population from the greater Riverside County area. According to the California Employment Development Department, for the third quarter of 2023, the average weekly pay in the Transportation and Warehousing sector in Riverside County was \$1,076, or \$55,952 annually. In addition to local employment opportunities, the Proposed Project would increase the March ARB/MIP Airport landing fee revenue and local tax revenue. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- This comment raises general concerns regarding the impacts of aircraft noise on health. Goal 2 of the March JPA General Plan Noise/Air Quality Element aims to "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." In 2008, the National Academies of Sciences, Engineering, and Medicine released Effects of Aircraft Noise: Research Update on Select Topics, which stated, "[t]rying to identify, measure, and quantify any potential effects of aviation noise on health is a complex and difficult field of study. Variations on how to identify and/or measure the noise exposure itself (single dose, long-term average, number of events above a certain level, etc.), and attempting to separate the effects from other life events are difficult at best. For example, lifestyles, life's stressors, hereditary factors, and genetic composition are just a few factors that may distort potential results of an aviation noise health effects study." The report reviewed the following:
 - Cardiovascular effects: "Some studies have identified a potential correlation between increased hypertension and aviation or road noise above certain noise thresholds; however, other studies contradict such findings. Occupational noise often becomes an intricate concern."
 - Effects on children: "Neither psychiatric disorders nor environmental factors showed any relationship to noise; however, psychophysiological parameters (e.g., heart rate and muscle tension) did demonstrate some relationship to noise."
 - Hospitals and care facilities: "Most airport noise and land-use compatibility guidelines list hospitals and care facilities as noise-sensitive uses, although there are no studies that have identified health effects associated with aviation noise."
 - Hearing impairment: "recent studies conclude aviation noise does not pose a risk factor for child or adolescent hearing loss, but perhaps other noise sources (personal music devices, concerts, motorcycles, or night clubs) are a main risk factor. Because aviation and typical community noise levels near airports are not comparable to the occupational or recreational noise exposures associated with hearing loss, hearing impairment resulting from community aviation noise has not been identified."

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not

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March JPA (Joint Powers Authority). 1999. General Plan of the March Joint Powers Authority. https://www.marchjpa.com/documents/docs_forms/general_plan_updt_011718.pdf.

National Academies of Sciences, Engineering, and Medicine 2008.

include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-83.6 This comment questions the potential for health impacts in relation to nighttime flights. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III of this Final EIR for details.
- I-83.7 This comment questions the EIR's statement that March JPA does not have the authority to modify flight paths or mandate aircraft types, but then discusses March JPA's authority regarding the number and hours of flight operation. MIPAA does not have authority over flight paths or aircraft types. The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. In addition to the Proposed Project, the EIR analyzes Alternative 2, which would not include any nighttime flights, Alternative 3, which would reduce flight operations by 10%, and Alternative 5, which would reduce Proposed Project operations 10% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-83.8 This comment identifies that some of the pages of the traffic analysis (Appendix M-1 of the EIR) are upside down. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Appendix M-1 will be checked before publication of the Final EIR and the pages will be set to the proper orientation.
- I-83.9 This comment is in regard to tables in Appendix M-1 and entries that are #DIV/0. The tables were checked, and the tables are correct. The values in the table used for the denominator are 0, and, since a number cannot be divided by 0, the result is thus undefined, which is represented as #DIV/0 in the tables.
- I-83.10 This comment questions whether the traffic model included traffic utilizing Alessandro Boulevard through Riverside. As discussed in Section 1.4.1 of Appendix M-1 of the EIR, the Proposed Project is not projected to affect any intersections along Alessandro Boulevard. The Project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant.

Comment Letter I-84

Fwd: STOP More Cargo Planes at March+ Please submit Draft EIR Comments by July 22

Danny Almeida <ddtalmeida77@hotmail.com>

Fri 7/19/2024 1:44 PM

To:Jeffrey Smith <smith@marchjpa.com>

----- Forwarded Message ----From: Catherine Barrett-Fischer <cbfcentury@aol.com>
To: C BARRETT-FISCHER <cbfcentury@aol.com>
Sent: Wednesday, July 17, 2024 at 01:36:58 PM PDT
Subject: STOP More Cargo Planes at March+ Please submit Draft EIR Comments by July 22

Dear Neighbors,

March JPA is at it again.

They are planning on adding 10,000+ cargo flights...over 34 flights operations per day. They plan to fly over our homes from 7:00am until 11:00pm. And add even more cargo flights over the Holidays!

1-84.1

The Draft EIR is available here: <u>marchjpa.com/meridian-d1-gateway-aviation-center-project/</u>

The public comment period will now end on Monday, July 22, 2024.

Meridian D1-Gateway Aviation Center Project – March JPA

Please copy and paste the letter below and fill in your name and address and include any comments you want to make and email to : smith@mmarchipa.com, CBFCentury@aol.com

Please share with your friends and neighbors. Thank you if you have already sent in your comments.

Please reply to this email with the word REMOVE in the subject line if you no longer want to be contacted.

Thank you. Best regards, Catherine Barrett-Fischer Community Alliance for Riverside's Economy & Environment (CAREE) careenews.org/ **Caree News** smith@mmarchjpa.com, CBFCentury@aol.com Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in 1-84.2 addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Please Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Page 2 of 3 in Comment Letter I-84

5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.	l-84.7
6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.	l-84.8
7) Cargo plane noise can adversely affect the academic performance of our children.	l-84.9
The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.	I-84.10
We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.	-84.11
Sincerely,	

April Alvarado

Page 3 of 3 in Comment Letter I-84

April Alvarado July 17, 2024

- I-84.1 This comment provides general opposition to the Proposed Project's number of flights and hours of operation. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-84.2 This comment is Form Letter B. As such, please see Form Letter B Response.

Subject: Meridian D1 Gateway Aviation Center project (SCH 2021040012)

Cesar Collazo <jetblast2001@att.net>

Wed 7/17/2024 8:48 PM

To:Jeffrey Smith <smith@marchjpa.com>;Catherine Barrett-Fischer <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community on Mission Grove.

I urge you to consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orange Crest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally harmful, community-focused alternatives.

Sincerely,

Cesar M. Collazo

1-85.1

Cesar Collazo July 17, 2024

I-85.1 This comment is Form Letter B with the addition of the commenter's neighborhood. This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter B Response.

More Cargo Planes at March

Edith Gingerich <edithg@earthlink.net>

Wed 7/17/2024 3:40 PM
To:Jeffrey Smith <smith@marchjpa.com>
Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Please Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

1-86.1

- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

Sincerely

Edith Gingerich 951-640-3881 5620 Via Cerezo Riverside, CA 92506

Edith Gingerich July 17, 2024

I-86.1 This comment is Form Letter B. As such, please see Form Letter B Response.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Fwd: STOP More Cargo Planes at March Air Force Base!!

Frances Sladek <fmsladek@gmail.com>

Wed 7/17/2024 3:34 PM

To:Jeffrey Smith <smith@marchjpa.com>;cbfcentury@aol.com <cbfcentury@aol.com>

Dear Mr. Smith — Sending again with correct address.

Thank you for your consideration on this important matter.

I 1-87.1

fms

Begin forwarded message:

From: Frances Sladek < fmsladek@gmail.com >

Subject: STOP More Cargo Planes at March Air Force Basel!

Date: July 17, 2024 at 1:49:19 PM PDT

To: smith@mmarchjpa.com, CBFCentury@aol.com

Dear Mr. Smith

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

1-87.2

I have lived in Riverside for 32 years with my family and for the first time the air quality is actually improving. In addition to noise pollution which is a serious concern, the ill-advised plan to start planes again will jeopardize that air quality. As someone with a heart condition, this is a serious health concern for me and my family.

1-87.3

The addition of numerous warehouses on the I-215 corridor is already an environmental concern. Addition of airplanes will make it even worse.

1-87.

Please Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and oxone increase

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-hamful, community-focused alternatives. Thank you.

Sincerely,

Frances Sladek, PhD
Professor of Cell Biology and Toxicologist
University of California, Riverside
fmsladek@qmail.com

1-87.5

Frances Sladek, PhD July 17, 2024

- **I-87.1** This is a general introductory comment. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **1-87.2** This comment is the first paragraph of Form Letter B. As such, please see Form Letter B Response.
- I-87.3 This comment raises general concerns regarding air quality, noise, and human health. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Air quality and noise pollution impacts are addressed in Section 3.2, Air Quality, and Section 3.11, Noise, of the EIR. The Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
- I-87.4 This comment raises general concerns regarding additional warehouses along the I-215 corridor and air traffic out of March ARB. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-87.5 This comment is the remainder of Form Letter B. As such, please see Form Letter B Response.

Meridian D1 Gateway Aviation Center project (SCH 2021040012)

Margarita Curras-Collazo <mcur@ucr.edu>

Wed 7/17/2024 4:16 PM

To:Jeffrey Smith <smith@marchjpa.com>;Catherine Barrett-Fischer <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community on Mission Grove.

I urge you to consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Sincerely,

Margarita Curras-Collazo

1-88.1

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Margarit Curras-Collazo July 17, 2024

I-88.1 This comment is Form Letter B. As such, please see Form Letter B Response.

Questions and Comments on the Draft EIR

Leonard J Mueller <leonard.mueller@ucr.edu>

Thu 7/18/2024 8:00 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to comment on the Meridian D1 Gateway Aviation Center project (SCH 2021040012)	I-89.1
I have the great pleasure of living directly under the SKYES4 flight path, adjacent to CastleView Elementary School. Every flight on that path goes over my house and I hear it. Right now, it is only 3-4 flights per day, mostly around noon. If the number of flights increases, it will severely limit my ability to use and enjoy my property.	I-89.2
During the DHL flights from 2007-2009, it was impossible to sleep in my house. The Riverside City Council performed a noise survey and many of my neighbors' houses were at 75 dB inside with the windows closed. It is impossible to sleep through that.	I-89.3
My comments on the EIR are the following, which I would ask you to address:	I-89.4
What SENEL values will be considered acceptable at the various times of day?	1-89.5
2. What grounds do you legally have to enforce SENEL limits?	1-89.6
3. Are you able to legally restrict planes that are too noisy from being used?	1-89.7
4. Are you able to legally restrict the hours that the planes will fly?	1-89.8
5. My understanding is that the planes can fly at any hour, provided that the company hires/pays people to work the tower. Is this true?	I-89.9
6. Will you comply with Riverside Ordinance no. 847 regarding noise?	1-89.10
7. Can you legally enforce your tenants to observe Riverside Ordinance no. 847?	I-89.11
https://rivcocob.org/sites/g/files/aldnop311/files/migrated/ords-800-847.pdf	•
8. There is no avigation easement on my property. Will you cease and desist if your noise disrupts my ability to use	1-89.12
and enjoy my property?	1-89.13
9. Based on SENEL, how many people are expected to be woken up each evening? 10. What will the impact of the noise be on students at CastleView Elementary?	1-89.14
11. What will the impact of the noise be on students at Castleview Elementary?	I-89.15
12. Based on my estimate of the SENEL, noise between 80-90 dB will be generated. This is consistent with the previous	
noise survey by the City of Riverside in 2009. Noise at this level will make it impossible to enjoy my property. What will you do about this?	I-89.16
13. Have you requested and reviewed the previous noise survey commissioned by the Riverside City Council in 2009? How have you addressed the impacts in noise outlined in this report?	I-89.17 I-89.18
14. Given that there are no real restrictions on when flights can fly or how noisy they are, what will the impacts be of flights from 10 PM - 7 AM that are at 85 dB?	I-89.19
15. What are the SENEL measurements of noise at Castleview Elementary and Taft Elementary schools for the array of flights that have flown in the past with DHL and that might be flown in the future.	I-89.20

Sincerely, Leonard Mueller 6190 Promontory Ln Riverside, CA 92506

Leonard Mueller July 18, 2024

- **I-89.1** This comment is introductory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- This comment describes personal experience with aircraft overflight. No comments, questions, or concerns about the environmental analysis included in the EIR are raised. The comment raises concerns regarding a potential increase in this overflight quantity and its corresponding effect. Figure 3.11-9 in the EIR reproduces the Compatibility Map (MA-1) from the March ARB/Inland Port ALUCP, which shows that the vicinity of Castle View Elementary School is within Zone D ("flight corridor buffer") and, per Table MA-1, is mostly within the 55 CNEL contour. This is consistent with Figure 3.11-4 from the EIR, which shows a 60 dBA CNEL contour that is at least 2.5 miles southeast of Castle View Elementary School and its adjoining residential neighborhood. The vicinity of Castle View Elementary School would not be expected to experience a significant impact on the basis of its distance to the Proposed Project and its anticipated flight operations.
- I-89.3 This comment refers to nighttime DHL flights that occurred from 2007 to 2009. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁷⁷ As of 2024, there were fewer than 20 DC-9s still in service.⁷⁸ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁷⁹ The Proposed Project is not related to past cargo operations.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

- **I-89.4** This is a general introductory comment for a list of questions that follow. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-89.5 This comment questions SENEL values considered acceptable at various times of day. Proposed Project-attributed SEL, which is equivalent to the SENEL acoustical descriptor, has been studied in Appendix L-2 of the EIR to assess potential sleep disturbance. In Appendix L-2, 85 dBA SEL is used as a noise contour to help estimate the area of population exposure within which sleep awakening probabilities have been predicted. The applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would

 $^{^{77} \}quad \text{https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation} \\$

⁷⁸ https://simpleflying.com/dc-9-operators-2024/

⁷⁹ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III of this Final EIR for details. Therefore, there is no need to evaluate sleep disturbance under March JPA's SEL threshold.

- This comment questions the legal basis to enforce SENEL limits. The applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III of this Final EIR for details. Therefore, there is no need to evaluate sleep disturbance under March JPA's SEL threshold. In relation to aircraft noise in general, MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. MIPAA would enforce this mitigation measure through the Mitigation Monitoring and Reporting Program.
- I-89.7 This comment asks about the legal basis to restrict noisy planes. MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. MIPAA would enforce this mitigation measure through the Mitigation Monitoring and Reporting Program.
- It includes limitations on both the legal basis to restrict hours of flight operations. The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- This comment asks if hours of flight operations are only dependent upon "people to work the tower." The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-89.10 This comment questions the Proposed Project's compliance with Riverside County Ordinance No. 847. The Proposed Project is not within the County of Riverside's jurisdiction and is not subject to Ordinance No. 847. Section 3.11, Noise, of the EIR analyzed the Proposed Project's noise impacts in relation to thresholds set by March JPA and the City of Moreno Valley (see Table 3.11-25 of the EIR).

- I-89.11 This comment requests future tenants be subject to compliance with Riverside County Ordinance No. 847. The Proposed Project is not within the County of Riverside's jurisdiction and is not subject to Ordinance No. 847. Section 3.11 of the EIR analyzed the Proposed Project's noise impacts in relation to thresholds set by March JPA and the City of Moreno Valley (see Table 3.11-25 of the EIR).
- I-89.12 This comment mentions a lack of an avigation easement on the commentor's property and requests a response regarding a "cease and desist" legal question with respect to potential noise disruption. That is beyond the scope of the EIR.
- I-89.13 This comment questions potential nighttime awakenings. The applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details. Therefore, there is no need to evaluate sleep disturbance under March JPA's SEL threshold.
- I-89.14 This comment questions the impacts of Proposed Project noise on students at Castle View Elementary School. The noise impact on students at Castle View Elementary School would be less than significant because they are much more distant from the project site than the nearest noise-sensitive receivers studied in the EIR. For example, the school is over 3 miles from the 65 dBA CNEL aviation noise contours shown in Figures 3.11-11 and 3.11-12 of the EIR. Additionally, the school is similarly distant from Proposed Project ground operations and sufficiently distant from roadway segments (and corresponding traffic noise) studied in Section 3.11 of the EIR.
- I-89.15 This comment questions the impacts of Proposed Project noise on students at Taft Elementary School. The noise impact on students at Taft Elementary School would be less than significant because they are much more distant from the project site than the nearest noise-sensitive receivers studied in the EIR. For example, the school is over 2 miles from the 65 dBA CNEL aviation noise contours shown in Figures 3.11-11 and 3.11-12 of the EIR. Additionally, the school is similarly distant from Project ground operations and sufficiently distant from roadway segments (and corresponding traffic noise) studied in Section 3.11 of the EIR.
- I-89.16 This comment provides the commentor's own estimated SEL value range and asserts consistency with a 2009 City of Riverside noise survey, then claims a conclusion with respect to property enjoyment and requests a remedy. The EIR properly assesses noise impacts, consistent with CEQA and its applicable significance criteria with respect to appropriate metrics and where potential noise impacts and mitigation needs are expected. As discussed in Section 3.11 of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhood identified by the comment is outside the 60 dBA contour line. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhood identified by the comment.
- I-89.17 This comment questions if March JPA had obtained a copy of the City of Riverside's 2009 noise survey. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

- I-89.18 This comment questions if March JPA had addressed impacts outlined in the 2009 Riverside noise survey. No comments, questions, or concerns about the environmental analysis included in the EIR are raised. As explained in Response I-89.16, above, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhood identified by the comment.
- I-89.19 This comment alleges there would be no restrictions on the hours of flight operations. As explained in Response I-89.8, the Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- It is comment inquiries about SEL measurements in the vicinity of Castle View Elementary and Taft Elementary schools with respect to "flights that have flown in the past with DHL and that might be flown in the future." As discussed in Response I-89.3, DHL cargo flights are no longer occurring and the Proposed Project is not related to those DHL flights. Such SEL measurements were not performed for the EIR, which assesses potential noise impacts per CNEL and sleep awakening criteria based on predictive analyses that are disclosed and discussed in Section 3.11 and Appendix L-2 of the EIR.

March JPA

Ms Shannon <shannonmarie7989@gmail.com>

Thu 7/18/2024 12:23 AM

To:Jeffrey Smith <smith@marchipa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012).

I understand the concerns with air traffic, being focused on environmental impacts, are in great abundance. But has anyone considered the ground traffic? Current road ways cannot handle the mass flow of traffic at the current point in time. The amount of traffic has skyrocketed in the last few years. 7 days a week, nearly all day long, the 60/215 is at near standstills in both directions. The development of the WLC focused on traffic impacts if the immediate areas. But not so much attention to the routes to get TO the area.

More cargo planes only means more diesel trucks. There are not many surface streets to use to bypass the clogged freeways. I, myself, will drive excessive mikes out of the way to avoid the freeway from Rubidoux Ave to Day St, between 7am-10am & 1130am-8pm.

I do believe the current gengestion needs to be solved before anymore growth or expansion occurs. Have you driven on the 215 nb & sb between 60/215 split to Harley Knox? The southbound side is past the point of dangerous. Cars in all lanes are constantly swerving or wheels slamming into the holes from missing portions of the road. Not just potholes. Massive portions are gone. The lack of proper "improvement" is seen in each layer of pavement thats visiable.

Road rage is clearly an issue with those who sit in traffic, regardless if its on a freeway or overly crowded surface street.

Reche Canyon used to have signs posted by area locals telling the passer-thrus to "slow down" to avoid serious accidents. Many fatalities occured with people racing threw the canyon. That isnt an issue anymore. Theres far too many cars on that 2 lane road. But its the only thru route to avoid the stopped freeway.

Pigeon Pass once was a thoroughfare. To my understanding, area residents didnt like any traffic, so the road was never repaired and now is completely blocked off so no cars can pass through. It should be 2-3 lanes (each direction) to help relieve the freeway. Same with Reche Canyon. And Redlands/San Timeteo Canyon.

More surface streets that go through along the freeways need also to be added.

Then, commence with bringing more traffic to the area.

Thank you for you time! Its much appreciated!

Shannon Helmholtz

1-90.1

Shannon Helmholtz July 18, 2024

Ithis comment raises concerns regarding traffic impacts. The Project Traffic Analysis (Appendix M-1 of the EIR) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

March Cargo Planes EIR

Tara Byerly <mobyerly@yahoo.com>
Thu 7/18/2024 8:05 AM
To:Jeffrey Smith <smith@marchjpa.com>
Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Please Consider:

- Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

Sincerely,

Tara and Mark Byerly 19536 Rotterdam St. Riverside. ca 92508 1-91.1

Tara and Mark Byerly July 18, 2024

I-91.1 This comment is Form Letter B. As such, please see Form Letter B Response.

1-92.1

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Ying Shen <yingyingshen@hotmail.com>

Fri 7/19/2024 5:36 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Ying Shen

92508

Response to Comment Letter I-92

Ying Shen July 18, 2024

I-92.1 This comment is Form Letter A. As such, please see Form Letter A Response.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

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Comment Letter I-93

Stop expansion of commercial air cargo

Marita Schleicher <maritabernd@sbcglobal.net>
Fri 7/19/2024 11:49 AM
To:Jeffrey Smith <smith@marchjpa.com>
Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Please Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

Sincerely,

Marita Schleicher 6868 Rycroft Dr. Riverside, CA 92506 (951) 233-0947 1-93.1

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Response to Comment Letter I-93

Marita Schleicher July 19, 2024

I-93.1 This comment is Form Letter B. As such, please see Form Letter B Response.

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Comment Letter I-94

Stop Commercial Cargo Planes

Bernd Schleicher <sbernd79@sbcglobal.net>
Fri 7/19/2024 11:54 AM
To:Jeffrey Smith <smith@marchjpa.com>
Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Please Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

Sincerely,

Bernd Schleicher 6868 Rycroft Drive Riverside, CA 92506 (951) 261-2449 1-94.1

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Response to Comment Letter I-94

Bernd Schleicher July 19, 2024

I-94.1 This comment is Form Letter B. As such, please see Form Letter B Response.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

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Comment Letter I-95

19 July 2024

Mr. Jeffrey M. Smith, AICP Principal Planner March Joint Powers Authority (March JPA) 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

RE: Public comment on record for the draft Meridian D1-Gateway Aviation Center Project, Environmental Impact Report, State Clearinghouse No. 20210400012

Attention Mr. Smith:

Thank you for considering my comments on the March JPA Meridian D1-Gateway Aviation Center project. The Proposed Project consists of two components: the Air Cargo Center Component and the Off-Site Component. Per the draft EIR, the Air Cargo Center Component involves the development of a gateway air freight cargo center, including taxiway and parking improvements, within an approximately 34-acre site within MIP Airport under the jurisdiction of March JPA. Also, per the draft EIR, the Off-Site Component of the Proposed Project includes taxiway and other infrastructure improvements within approximately 12 acres of March ARB. Once constructed, the draft EIR states that the Proposed Project is anticipated to average 17 two-way flights per day (34 flight operations per day) with up to 22 two-way flights per day during busy seasons.

My comments reflect documents available publicly on the March JPA website which to the best of my knowledge are the most recent available to me. These documents include:

- Draft Meridian D1-Gateway Aviation Center Project, Environmental Impact Report,
 State Clearinghouse No. 20210400012 and plus Technical Appendices A-O, May 2024
- Meridian D-1 Gateway Aviation Center Project Presentation, July 1, 2024
- Meridian D-1 Gateway Aviation Center Project Presentation, June 18, 2024
- Final West Campus Upper Plateau Project Environmental Impact Report (Correction)
 State Clearinghouse No. 2021110304 and plus Appendices A-U, June 5, 2024
- Recirculated Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices, December 2, 2023
- Draft West Campus Upper Plateau Project Environmental Impact Report State Clearinghouse No. 2021110304 and plus Appendices A-S, January 9, 2023
- March JPA Final Environmental Justice Element, April 2024
- March JPA Draft Environmental Justice Element, November 2023
- March JPA TAC Meeting Minute Notes from February 6, 2023, April 3, 2023, June 5, 2023, August 7, 2023, September 6, 2023, and December 4, 2023

1-95.1

 Local Guidelines for Implementing the California Environmental Quality Act for March Joint Powers Authority (et al), 2022

- General Plan of the March Joint Powers Authority, assumed March 11, 1997
- General Plan Land Use Plan, assumed March 11, 1997
- Planning Related Maps (Zoning General Plan/Land Use), July 2018
- Settlement Agreement: Center for Biological Diversity, September 2012
- Settlement Agreement: CCAEJ and CAREE, August 2003 (not on the JPA website)
- Riverside County Civil Grand Jury Findings on the March JPA, March 21, 2024

For the purposes of this comment letter, I will refer to the March Joint Power Authority (JPA) which includes the Commission members, the developer that is understood to be LNR Riverside, LLC, Meridian Park West, LLC, the Lewis Group of Companies (partners and subsidiaries), and member entities the cities of Riverside, Moreno Valley, and Perris, and the County of Riverside.

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Cont.

Over the past fifteen years, the March JPA and its exclusive business partner, have increasingly discovered that your plan to turn the March Airport into a logistics hub is meeting with resistance from not only local residents, especially those living in the EJ communities within the March JPA area, but you are also starting to see concern from elected officials locally and members of the JPA Commission. Since you refuse to include the public in any part of your planning process, exclude a stakeholder throughout this process, I am forced once again to write to you in objection to your inadequate draft EIR document for the D1-Gateway Aviation Center.

1-95.3

Whether it be your ill-conceived agreement with DHL or the recently tabled West Campus Upper Plateau project plan, your unpopular and predatory practices of up-zoning land use designations to include more industrial zoning or zoning designations that permit warehousing, the March JPA has demonstrated though its piecemealed actions more than its words that you intend to observe only one audience with your plans to repurpose the decommissioned March ARB: developers and the speculative real-estate investors that back them. Your insistence on piecemealing individual projects, that in-and-of themselves don't constitute an affront to the public, is just a façade covering your purposeful land use planning that is designed to connect as many warehouses designed to store and move goods in order to service an airport that you want to grow on the backs of freight movement.

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This nefarious plan is being executed largely outside of public knowledge and feedback. The March JPA, as was determined by the County's Civil Grand Jury, is marginally compliant in its role as a public service agency. You routinely advocate in favor of for-profit businesses usually at the expense or instead of in favor of residents and members of the communities living within and surrounding the March JPA area. This assertion comes from a long history of being your neighbor and realizing that living next to you is like living with a family of cats. You see, cats are selfish and don't have the same emotional connection with their owners or people in general. Cats are also an environmental disaster, killing literally billions of birds, reptiles, and mammals

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in the US every year. When it comes to affection, cats will rub up against the leg of their owner (or another human) when the person enters a room, for example. It's easy to construe this as a sign of affection, as humans are also selfish animals and we believe the world, and cats, cater to our needs. Yet many researchers interpret this as an attempt, by the cat, to spread his or her scent, as a way to mark territory and maintain the mutually beneficial relationship with the human. In many ways, living with the March JPA is just like living with a whole bunch of cats. You have never demonstrated an emotional connection with the public, your humans, and you only tolerate us when it benefits you. Like cats, you have no problem displacing or killing wildlife if it suits your developmental goals. And like cats, you show affection (public hearings) as a matter of procedure, to demonstrate in a CEQA review that you engage with humans as you are required to do. A naïve community would interpret this as a sign of affection, you connecting with us, but in reality, you are just marking your territory and trying to build another warehouse to feed your ever-hungry developer friends and more importantly their greedy investors. I love cats, but I do understand my relationship with any cat has always centered around the cat. I do not love the March JPA because you make it clear that our relationship is ONLY about the profit of wealthy developers under the guise and banner of the March JPA. The truth hurts sometimes.

I-95.4 Cont.

Moving on to the draft EIR for the D1-Gateway Aviation Center project and the flaws that, like in all of your recent environmental impact statements and environmental justice element policies, permeate this document. The Draft EIR is inadequate in addressing and mitigating the myriads of negative environmental impacts this project would cause to the community.

While this project does not sink to the depths of disgrace as the West Campus Upper Plateau project, it is equally as dismissive of public preference and sentiment as the mega-industrial Upper Plateau proposal. 38 months after your first scoping meeting for this project, the public still does not understand your thoughts on significantly and unavoidably impacting our lives with your development projects. This warehouse project is not like other warehouse projects regionally because you insist on expanding large-scale freight flights in and out of March Airfield every day, directly over the heads of residents, commuters, parks, churches, and schools. The project will have a significant negative environmental impact on the community it borders regardless of the CEQA mandated mitigation efforts and the JPA's hollow claims of community benefits (jobs). It is inconceivable to the public why the JPA continues to push forward this specific plan and project, especially after more than three years of widespread and uniform community opposition to your efforts to make the region an industrial zone. Your efforts in the end are scandalous and possibly illegal.

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You see the developer is wrong when they say that these plans are consistent with the development of the area. They are wrong because it is the applicant, not the JPA or the public, who is determining what type of development should and will occur surrounding March Airfield. Would the JPA be upset if the plans included building homes, restaurants, parks, shopping centers, amusement parks, outlet malls, research facilities, or museums? Well, the developer seems opposed to them as these types of projects are not as profitable to them as warehouses. If

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the JPA actually did reach out to the residents living in and around the March JPA area, you might hear some of these ideas suggested because these ideas make our lives better. A warehouse and more flights don't.

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After reviewing the draft environmental impact report for the D1-Gateway Aviation Center project, it is clear that the March JPA is scrambling to push through an unpopular land use policy before sunsetting July 1, 2025 leaving the County of Riverside to sort out the messy timelines of construction, negative public relations, project mitigations, budgeting pitfalls, oversight of the settled agreements, monitoring of flights and air traffic, and the overall expansion of the March Airfield for private gain rather than public benefit. There are still many errors, omissions, misrepresentations, and discrepancies in the draft EIR despite the JPA claiming this is a stable and acceptable document. I write this letter to call attention to as some of these issues, especially those that are the most egregious to my family and my community. Specifically, I submit the following list of instabilities, concerns, exaggerations, mistakes, and examples of high-end shenanigans in the draft EIR and its appendices for the record.

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1. Fundamentally, this project expands airport operations at March. Yet the vision and the words found in the Final Reuse Plan make no mention of this being a primary mission of the March JPA. Does the March JPA now believe it has a duty, a mission to maximize operations at the airport? Why is fully utilizing the operations capacity of the MIP airport a project objective now? Does this privately-developed new mission involve maximizing freight operations? Making this your primary project objective is disturbing to local residents. As the narrative of this letter implies, the March JPA's thinly veiled efforts to do the bidding of a for-profit developer who looks to capitalize on the FTZ status surrounding March ARB is in direct conflict with your mission to redevelop the land around March ARB to revitalize the communities impacted by March's reduction in military operations. Your focus has shifted from helping the people impacted by a change in federal policy and budgeting to helping businesses maximize profit and take advantage of FTZ244. The March JPA Director has said as much in public presentations and City Council addresses. Why does this project need to focus on freight, logistics, and warehouses instead of public benefit as the Final Reuse Plan envisioned? Your draft EIR does not justify the primary project or two other logistics focused alternative plans. I request you withdraw this project plan until you have a project that clearly balances benefit to the communities surrounding March ARB and those that wish to do business and profit in the area.

1-95.8

2. The omission of clearly identified Environmental Justice goals specific to this draft EIR is a clear oversight by the JPA. The nature of the JPA's piecemealing efforts for each project proposed assumes that all projects align with your EJ Element because you assume and project that you have an authentic EJ Element. You don't. This project, and the delicate work at the project site involving the "burn areas" so close to one of your EJ Communities without mitigations for them is yet another example of the March JPA saying you do something but providing no requirement or tracking of whether you are in

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fact doing what you say. The JPA, once again, wants the public to believe that you are only following an appropriate approval process to comply with State law, and that the full weight of your EJ Element will be behind this project, but there is no indication in the draft EIR if or how you will follow your invented EJ policies specific to this or the alternate project plans. Pending litigation, I request the March JPA withdraw this draft EIR until you can develop and approve an authentic Environmental Justice policy that is CEQA complaint, one that applies to the March JPA development area rather than piecemealing a policy on top of other JPA projects to gain benefits from one while applying those benefits to another. The dramatic impact your primary plan will have on the environment is not a small thing. Your haphazard attempt at adopting an EJ Element to cover your significant impacts to the environment surround March ARB is your agency checking a box instead of protecting the environment and those that live in it.

I-95.9 Cont.

3. Adopting a General Plan amendment for this Specific Plan that relies on the passing or existence of another projects that will cause environmental harm is piecemealing or segmenting which according to CEQA means "dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document." This, according to CEQA, is "explicitly forbidden because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less-than-significant impact on the environment, but which together may result in a significant impact." To the public, it seems like this is exactly the process that the March JPA follows as it amends the General Plan with Specific Project Plans. Therefore, I request the March JPA follow the guidance of the County's Civil Grand Jury and develop project plans that minimally impact local residents. This draft EIR is fraught with less than significant with mitigation and significant and unavoidable impacts to the environment (Table ES-2) rather than focusing on development practices that seek no impact or less than significant impact on the environment and local residents.

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4. As disappointing as it was to read, the Civil Grand Jury report found that the March JPA involves the community in its decisions, though as a member of the public I am not sure I feel involved. Proposing to increase flights by 10,608 per year (at least for now) shows that the March JPA is only taking comments and feedback from those who stand to profit from this project were it to be approved as is. Hearing one-way comments at meetings, and holding one-way public meetings where the community is informed or surveyed is inauthentic community engagement. Your Community Meetings of June 18 and July 1, 2024 were just that, one-way communication where the public was told by you that you would not be answering questions about the draft EIR. Minimally compliant: you held meetings, some public attended, you extended the EIR response timeframe, you have gone above and beyond what is required of a public agency (sarcasm is intentional). There is virtually no evidence that the JPA will implement community feedback in the final EIR for the Aviation Center. Much like the West Campus Upper Plateau project, you have opportunities to remedy this problem, but you will decline for a variety of

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reasons. I routinely request to be part of an active community advisory committee to help the JPA as it makes important land use decisions. By ignoring requests like mine, you are locking out the public from having meaningful engagement with the March JPA which leaves you exposed to litigation. I request once again to have a community advisory committee to the March JPA consisting of residents living in the March JPA special district and members living in neighborhoods bordering the March JPA development area (you are my neighbor and a bad one at that) including those living in communities impacted by the 10,000 additional flights annually over their homes.

- 5. In its investigation, the Civil Grand Jury were unclear as to why the March JPA does not have a community advisory committee focusing on the development of excess ARB lands. In its response, the March JPA described the Public Advisory Committee of the "Airport Master Plan," which is financially supported by the Federal Aviation Administration (FAA), comprised of federal, state, and local government representatives as well as residents instead of a formal Community Advisory Board to the JPA. The Grand Jury asked the JPA about the Commission's perspective on establishing a community advisory committee, given the public frequently requests to form one, and the response given was that JPA management did not know what perspective the Commission had on creating a community advisory committee. This is an excuse and a callous statement by the March JPA to defend staff decisions to not engage authentically with the public. The JPA has repeatedly declined forming a community advisory committee both verbally and in writing. The reasons vary from "there isn't time" to "there isn't a need." These responses demonstrate how the JPA engages with the public. The Civil Grand Jury also noted the California Department of Justice published a document that identifies "best practices" for governmental agencies facing land development projects, especially potential warehouse projects. One of the "best practices" mentioned in that California Department of Justice document is for local governmental agencies to create a community advisory committee made up of residents. The JPA must alter its standard business practices related to public engagement, especially on those matters that significantly impact our quality of life and health. Thus, I request the March JPA comply with the State of California DOJ recommendations and with the suggestion from the Civil Grand Jury to authentically engage with the public via a permanent public advisory committee to the JPA.
- 6. The continued privatization of public lands surrounding March ARB and throughout southern California, including the highly suspicious recent request by the applicant to form a second long-term development agreement which appears to be influenced heavily by private interests in order to avoid public, regulatory, or enforcement agency oversight. The Institute for Local Self-Governance published a manual on establishing development agreements which they title "Collaboration in Pursuit of Community Interests." In it they define development agreements as:

Development agreements are contracts negotiated between project proponents and public agencies that govern the land uses that may be allowed in a particular project. Although subject to negotiation, allowable land uses must be consistent

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with the local planning policies formulated by the legislative body through its general plan, and consistent with any applicable specific plan. Neither the applicant nor the public agency is required to enter into a development agreement. When they do, the allowable land uses and other terms and conditions of approval are negotiated between the parties, subject to the public agencies' ultimate approval. While a development agreement must advance the agencies' local planning policies, it may also contain provisions that vary from otherwise applicable zoning standards and land use requirements. The development agreement is essentially a planning tool that allows public agencies greater latitude to advance local planning policies, sometimes in new and creative ways. While a development agreement may be viewed as an alternative to the traditional development approval process, in practice it is commonly used in conjunction with it. It is not uncommon, for example, to see a project proponent apply for approval of a conditional use permit, zone change and development agreement for the same project. Under a development agreement, both parties to the agreement receive benefits. In addition to the greater latitude afforded by the development agreement to advance local planning policies, the public agency has greater flexibility in imposing conditions and requirements on proposed projects including the applicant is afforded greater assurance that once the project is approved it can be built. There may be disadvantages associated with development agreements as well (bad planning, unrealistic expectations related to feasibility of the project, and fixed rules of engagement.) A development agreement generally allows a project proponent to proceed with a project that meets the "policies, rules and regulations" in effect at the time the development agreement is approved. A development agreement may also supersede an agency's existing policies, rules and regulations, as long as the project is consistent with the general plan and any applicable specific plan.

I-95.13 Cont.

In my comment letters for the West Campus Upper Plateau EIRs, I expressed concern that the Lewis Group has held a 25-year exclusive agreement to develop the land around March ARB. Your response to me was that this was an acceptable and appropriate form of contracting and that the application of Federal Acquisition Regulations (FAR) did not apply on projects under the March JPA. Whereas the FAR was established to protect the public from fraud and misuse of public funds and resources, and would certainly prevent the business model followed by the March JPA, development agreements rely on government to act on behalf of the public in order to get land development projects done in a timely and cost-effective manner. The JPA has, as is its pattern, has either found a way to streamline its operations by allowing one developer access to public resources, or the JPA has been complicit in fraud and misuse of public resources. For example, the manual identifies that development agreements at the County level: "Annual review is required. County development agreements are time-limited if land is annexed or incorporated (Government Code section 65865.3)." Code 65865.1 also states:

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"Procedures established pursuant to Section 65865 shall include provisions requiring periodic review at least every 12 months, at which time the applicant, or successor in interest thereto, shall be required to demonstrate good faith compliance with the terms of the agreement. If, as a result of such periodic review, the local agency finds and determines, on the basis of substantial evidence, that the applicant or successor in interest thereto has not complied in good faith with terms or conditions of the agreement, the local agency may terminate or modify the agreement." Historically, the March JPA does not follow this guideline adequately because if you had you would have ended your agreement with the applicant each time the projects it built with your approval failed to meet the job requirements. This failure impacts payment milestones and rather than amend the development agreement to incorporate occupancy or grading-based payment milestones instead of jobs, you remove the requirement for a minimum number of jobs created under the current development agreement (October 26, 2022). The JPA is able to skirt contractual requirements because development agreements give you the flexibility you desire to maintain your mutually beneficial relationship with the applicant. An uninformed public is prone to conspiracy when discussing concerns about confusing government operations (like the West Campus Upper Plateau project), but it doesn't take long for an informed public to see that the JPA manipulates the structures within the development agreement to benefit private interests which is not aligned with the Institute for Local Self-Government manual. The manual concludes: "Development agreements can be a useful tool in land use planning, creating win-win opportunities for both project proponents and local agencies when dealing with uncertainties associated with the regulatory environment. The goal of this manual is to help local agencies in understanding development agreements and to provide them with practical tools to assist them in using development agreements within their jurisdiction." The end result of a development agreement is to benefit the public, and the JPA's justification fails to adequately do this for the public. At this point of the draft EIR process, the document only indicates the project timeframe to be from 06/01/25 to 03/30/26 and makes no mention of requiring an additional development agreement to complete this project. To prevent such a need for extended time from arising as this project progresses from draft to final EIR, I request that the JPA refrain from extending a long-term agreement to the Lewis Group for any additional projects with the JPA. One reason the March JPA has been a bad neighbor is because the Lewis Group treats this region as a profit zone rather than a community and thus, due to weak oversight and management by the JPA, residents do not trust the JPA or this applicant to propose beneficial project for the region. As reading my letters can be viewed as a repetitive process, the same can be said for finding the JPA ignoring and excluding the public from its decisions and nowhere is it clearer than in your insistence on maintaining a long-term development agreement with the Lewis Group. I request the JPA allow the existing development agreement to expire as you sunset and turn the final parcels to be developed over to the County of Riverside who will be compelled to engage in a competitive bid process that engages the community, reduces environmental impacts, and prioritizes innovative land use planning.

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7. With the formation of the General Plan (as stated on page V of the General Plan), the March JPA was created as a public entity tasked with preparing, adopting, implementing, and maintaining a general plan that serves to link community values with actual physical decisions. You were tasked with creating a community with diversity and inclusiveness with respect for the military, private, and public land uses; to address circulation, housing, conservation of natural resources, preservation open space, and protect public safety. It is unclear how maximizing the 21,000 civilian flights per year on top of the military's flights and the soon to be developed Riverside Sheriff's flights over this densely populated area is achieving the goals set forward in the General Plan. It is also not clear how the piecemealed approach to project planning by the JPA has represented community values and preference. Your "consistent" findings in Table 3.10-1 are JPA and contractor focused and demonstrate that the JPA has no input from local communities, residents, or their EJ constituents who largely disagree with your management and planning for the land surrounding their homes. There isn't a single resident who wants either more flights over their heads or more trucks clogging the already impacted roadways in the region. Since the JPA, minimally compliant as ever, treats each project independently when it benefits you, collectively when you want to brag about yourself, is unwilling to acknowledge and contribute to infrastructure projects to improve lives of residents surrounding March ARB, you should then consider alternate projects that alleviate the burdens on the public rather than create more impacts on an already saturated region. I request the JPA explore more diverse land uses for this area and ways to make the airfield at March part of the community instead of a center for FTZ244.

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Additionally, I find the draft EIR egregious and deficient in the following locations:

1. The project design feature listed on page 2-9, Payment of Fair-Share Cost, is an interesting idea but it is unclear if the \$281,498 figure is enough to pay the developer's fair share of road extension and improvements to Heacock. There is no information about the recency of the estimate that formed this cost figure and no total estimate to determine if this funding is sufficient to complete the job. My concern is that it is a developer derived figure, a not-to-exceed cost, that they are comfortable paying but if the cost is drastically higher than the City of Moreno Valley will have to foot the extra expenses. When was this fair share cost estimate created? What does the City of Moreno Valley think about the extension costs to Heacock? And why isn't there a cost associated with traffic patrol and monitoring by the Riverside Sheriff included in this "fair-share cost?" Seems, as with many public improvement projects, the public is left footing the bill for more than its fair share of it.

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2. In the appendices, the JPA uses site surveys from 2020 and 2021, especially related to the burn areas, native plants, and special status bird and animal presence on site. Why is the JPA using surveys that are 3-4 years old? Is this the kind of information that does not change? The draft EIR appears out of date and may require survey data that is more recent before any final projects can be considered.

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- 3. Residents are concerned about the 10,608 annual flight increase resulting from this project. Some concerns after reading the draft EIR include the following:
 - a. The public is concerned that the JPA's airport EIR allows for a high number of commercial flights and this specific project appears to allow for a smaller number of flights than your master document allows. With this in mind, it is reasonable for the public to worry that we already suffer from significant noise from flights emanating from the March Airfield and those who can read the tea leaves realize that the March JPA and Airport Authority have designs on increasing freight flights at March over time in an attempt to gain market share away from already established logistics airports like LAX, Ontario, and San Bernardino regionally. The JPA's claims that this project is consistent with the goals and policies of the General Plan are narrowly defined to address the wishes of those who stand to profit from these projects and increased noise and air pollution. Your misstatements about there being a need for more freight flights in Southern California are an exaggeration; the local warehouses would benefit from more flights from March Airport, but the region has more than enough capacity for freight flights from three other airports, and the March JPA's attempts to take those flights from the existing airports isn't about flight management, its about profit centers. Who is responsible for monitoring the number of flights with respect to the total number of allowable civilian flights for the airport? Is it the FAA? How will the JPA collected and implemented public preference for this project into the final plan?
 - b. Who is responsible for ensuring that the flights do not ever exceed the additional 10,608 stated in this draft EIR? As the airport either reduces or increases civilian flight capacity, residents who believe we already experience too much air traffic over our heads will be distraught at the news that the region may indeed see more than 10,000 additional civilian flights per year. The environmental impacts from such a significant flight increase (I realize it is a projected number at this point) will negatively impact air and noise pollution in the region and greatly reduce the quality of life in the area.
 - c. Why does the draft EIR not include flight projections for other airport uses such as the future flights for the Riverside Sheriff, changes in military training and operational flight numbers plus troop deployment flights, and the ever-present training flights of the remotely piloted aircraft, such as the MQ-9 Reaper and the RQ-4 Global Hawk, housed at March ARB? I also find the types of military planes listed in Table 3.11-3 to be incomplete. Your study leaves out not only routine training flights of the F-22 Raptor as well as other visiting military cargo, refueling, and fighter jets. The sound of these diverse aircraft is almost as persistent as the beep-beep-beep of a semi-truck backing up or the shoosh of a J-brake being released. The draft EIR is woefully deficient in its noise monitoring studies for the region and is lacking accurate data on all flights in the area, leave it

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1-95.23 to the JPA to once again piecemeal data for a project it wants to make look good to the public and Commission. d. The noise levels identified in the draft EIR measure flight noise data for military aircraft more so than the noise levels for freight planes like the ones you hope to employ under this project. Some consideration for the noise levels for flights at maximum, average, and minimum weight for the type of cargo planes used by freight carriers like the Boeing 737-300, 767-300, or the Airbus A330-300. The 1-95.24 weight of the plane will directly alter the noise it produces on take-off and landing, given the current state of aircraft. Weather (such as cloud cover and wind) also plays a role in the noise levels and it would be more accurate if weather was factored into your study and the results. More accurate noise impact and mitigation is needed before any new freight flights can be considered. In addition to the noise level data errors and omissions, I also believe the noise measurement locations identified in Figure 3.11-2 demonstrates a flaw in your study on noise. It appears you are collecting data at a specific distance from the runway rather than collecting data in a variety of land use areas that lie beneath the flightpath. For instance, your lack of measuring sites in the OrangeCrest or Mission Grove neighborhoods of the City of Riverside demonstrate your lack of understand or sympathy for the impacts of airplane noise over people's homes. The only residential locations for measurement seem to be at site S3. Sites L2 and 1-95.25L3 appear to be near residential but nowhere near the scope of homes as are currently impacted by the noise pollution produced by current military and civilian flights from March Airfield. Also, your sites need to focus more on churches, schools, parks, and shopping or business areas beneath the flightpath and surrounding the landing and take-off pattern for not only military fights, but also freight flights. A new study is needed with appropriate measuring sites that reflect life near and under the flightpath, data not collected during COVID. 4. On page 3.2-49, the tenant agreement requirements seem unenforceable. Who is responsible to see that any future tenants for this building adhere to these or future requirements for occupancy? With the JPA sunsetting in July 2025, will you be transferring this responsibility to the Airport Authority? The County? And what 1-95.26consequence exists if future tenants are not in compliance with these requirements? The JPA has a long history of this practice where you do not have the resources to manage these terms and thus tenants only comply minimally with them when forced to by residents, just like the JPA. The draft EIR is lacking detail to support your objective here. 5. I am concerned with the "relocation and mitigation plans" for special species like the Burrowing Owl and other nesting birds. My objection stems from a disappointment that humans are eager to move one species to a new home when their current home interferes 1-95.27with "progress." This is not an issue I expect the March JPA to remedy in the EIR, you have stated your plan to move them instead of eradicate them so I guess the public will have to accept your mitigation.

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6. Table ES-2 identifies the impacts for the proposed and alternate projects. While I disagree with your findings of "No impact or less than significant," the green boxes, I do realize you are measuring this standard by a narrow development standard instead of surveying the public about the nature of these impacts. That said, there are not many green boxes in this table outside of aesthetics, energy, and utilities. Why are you pursuing projects that require significant mitigations and significant allowances by the public to tolerate your profit-driven goals? Even the non-industrial alternative project has real impacts on people's lives even with your idea, but not realistic, mitigations. Poor air quality, noise and light pollution, and horrific traffic plague this region. In three of your four plans, this project will have significant and unavoidable impacts in air quality and noise pollution. You have covered light pollution in aesthetics and energy which you state will have no impacts related to the environment. I again point to the fact that you use narrowly defined standards to determine this and you don't discuss this with the public who live with your polluting lights. Adding any lights to the runway at March will be visible to residents living with a view of the runway within a 3-5 miles. There will be tremendous light and noise pollution coming from the aircraft 17-22 additional times each day. And because the JPA and applicant don't live here, you don't realize just what impact you are having on people's lives. You don't realize, or care, what sacrifices in life that you ask residents to make on a daily basis. Thus, I request the JPA to consider alternate projects that benefit the public, reduce the noise and light pollution associated with development like this, and engage more with residents and act on their complaints and requests.

- 7. The findings in section 4.3 Significant and Unavoidable Environmental Effects, page 4-10, lists two of the three main areas of concern for a majority of the public. While the JPA has identified these impacts and how they will negatively impact and continue to degrade the environment, you appear to be compliant under CEQA according to your consultants. This fact couldn't be more appalling to the public in that the things about this project that the public loathes the most (air and noise pollution, and increased traffic) are things that the JPA admits it is helping to destroy (peace, clean air). This admission must tell the JPA, the applicant, and the Commission that this is not a good project for the region unless you only see it through yellow (polluted and greedy) tinged glasses.
- 8. Section 4.4 Significant Irreversible Changes, page 4-10, is disturbing, especially bullet number 2: "The primary and secondary impacts of the project would generally commit future generations of people to similar uses." Combine this sentence with one from the next page: "Determining whether the Proposed Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them." After reading, listening to, and talking with the March JPA for nearly seven years now, I know that these two sentences connect and tell a story that the public would find disturbing and disheartening. The word "resources" here is intended to refer to non-human resources like water or plants, but as I have come to understand the JPA and the word resources means people, more specifically low-paid, uneducated workers. So, whether the JPA's

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consultants realized it or not, the JPA says that the project (and really all JPA supported industrial projects) will irreversibly alter the type of workers that the region will employ now and in the future (which is exactly what is happening). The JPA isn't concerned with helping young people find jobs and careers that will allow them to afford to live in the areas surrounding March ARB. The cost of living is too high in Moreno Valley and Riverside to allow most warehouse workers to live nearby. As a CEQA issue, this project will provide temporary construction jobs and some freight movement and warehouse jobs (projected 0.04% as indicated in the draft EIR), and while I am an advocate for full-time, high-paying jobs with benefits, especially ones that do not require a college degree, the March JPA doesn't advocate or provide jobs for highly qualified and educated workers. The March JPA has a duty to redevelop this land to benefit all people in this region, not simply to offer for-profit businesses cheap land, tax free storage, and a low paid, uneducated workforce as you project in Section 4.4. This type of development does not enrich the community, give people hope for a better life, or attract sustainable growth to the region. And for this reason, alternate plans must be considered.

1-95.32

9. In Section 5.3, Alternatives Considered but Rejected on page 5-1, it is once again disappointing to see the JPA via the applicant narrowly consider alternatives to the primary project. I realize by the nature of the site location that options are limited. I also realize the business objectives of the JPA and applicant dictate that you need to build more warehouse and goods movement projects to justify your bad land use decisions and lack of community engagement over the last 15 years. Only one of the projects offers any development other than industrial and that is Alternative 4, Private Aircraft Operations. In this alternate plan, you are selling yourself and the public short in that you could have proposed an airplane repair shop or even better an airplane mechanics training or school to help young people interested in aviation repair and maintenance a place for hands-on training and learning. You could have offered flight school from this location. You could have integrated a café like at the Riverside Airport. But you chose to diminish this alternate plan because, as you write in the EIR, it does not meet your arbitrary project objective of maximizing airport freight operations. Again, as stated before, this is not a mission of the March JPA and should not be a project objective. You only include it here because it "legitimizes" your false narrative that logistics is good economic growth for the region. I request you (a) develop better and community preferred alternative plans, and (b) revise your project objectives to allow for non-industrial uses and reduced flights. The JPA needs to join the human community and realize that you are compelled to choose the environmentally superior alternative project whenever you can because the people who developed the March JPA General and Final Reuse Plans had very little warning that the climate in southern California, and the globe, would so drastically change and that the change is being largely driven by human activities and choices. Every time you disregard the best project for the environment, you disregard the people living in this region, especially the members of the EJ communities, and of the life that depends on ever increasingly polluted air and water resources in this region. You must do better.

1-95.33

1-95.34

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As a concerned citizen, it is not enough to just find problems with the draft EIR and the process the March JPA has undertaken to get to this final document. Responsible citizens take an interest in their community for the benefit of all people and organizations, working to avoid the economic and social injustices that these warehouse projects present our communities. Your continued insistence of performing for an audience of one is scandalous. The public demands better from you, a public entity working on behalf of the people.

1-95.35

Based on the painful experience of living through a March JPA warehouse development project from start to end, I know that your mitigations do not significantly reduce impacts for residents and you do not accept responsibility when those impacts cause damage to local neighborhood houses, despite your contractor's insistence that you do. Therefore, I request the March JPA, as part of the whole of the action, also establish an official community benefits program and fund to pay for repair and cleaning of HVAC and heating units near the project site and flight path; repair or replacement of real property like windows, stucco, tile, brick, or stone, decorative features affixed to homes like shutters or facia boards, plumbing, or foundation damage near the project site and flight path; pest control associated with insects, rodents, wildlife, and reptiles/amphibians displaced by demolition and grading activities near the project site and flight path; clean-up or repairs from dust related damage to gutters, paint, pool equipment, and loss of landscaping such as trees, shrubs, fruiting plants and vegetables and lawns near the project site and flight path; and any other tangible noise abatement mitigations available to homeowners near the project site and flight path. The wording of such an agreement and fund is better left up to experts in this field, but a reasonable value for such a community benefit fund is anywhere from \$50,000,000 to \$60,000,000. If you want to effectively improve the lives of people living in the March flightpath, the JPA and applicant would fund the mitigations and repairs for residents impacted by your narrowminded land use planning. As someone who routinely asked for help with these things from the construction office located on Meridian Pkwy behind my house, I know getting the JPA to respond to requests for help is nearly impossible. Being proactive in this case is a real community benefit and would demonstrate to the public that any benefits that the applicant and the JPA list in future drafts of this EIR are actually benefits to the community rather than necessities of the construction project.

1-95.36

Rather than simply oppose this project on the surface, though it is exactly what I am doing as this project minimally (0.04%) benefits the public in any way, I request that the March JPA drastically alter this specific plan, especially the off-site component of the plan, to significantly reduce the number of flights allowed in total as a result of this project. Since you have no tenant for this warehouse, no carrier using the flights you planned, reduce the flight numbers, operational hours, and establish a gradual growth plan for 5-10 years increasing a mix of private and freight flights slowly over time not to exceed 12-16 per day over this period regardless of whether the flights are private or freight. I also request the JPA insist on a significant increase in Heacock expansion costs contributed by the applicant to reflect inflation and increased costs in materials and labor. \$281,498 is insufficient and likely an outdated figure.

1-95.37

1-95.38

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By submitting this letter as comment on the draft Meridian D1-Gateway Aviation Center project, I am endeavoring to preserve the local trust for my community and neighbors. I submit this response to the JPA in hopes that you consider my thoughts as an educated public review of your project plan, and a voice of thousands of residents who don't have the time, resources, ability, or desire to hold you accountable to the public interest. I submit this letter as evidence of the JPA's purposefully neglectful governing, scandalous land use decisions, predatory and manipulative economic growth practices, and failure to promote and ensure that community interests are foremost in the repurposing of public lands.

1-95.39

Lastly, I write today to request the JPA honor its responsibility to make our lives better through your oversight and land use decisions. You have been unable to answer my question from 20 months ago, but it is worth asking again and again until the JPA sunsets or changes its ways: Has the JPA improved people's lives? It seems the answer to that can be found in your image in Figure 2-3 that shows a disproportionate number of Industrial and Business Park land use designations that clearly indicate you are trying to manipulate the region economically and create a low-paid, uneducated workforce that will settle for the bad jobs you are bringing to western Riverside County. By moving forward with this unnecessary industrial project, one that will dramatically impact the lives of thousands of residents for the next 20 years, you are once again signaling your disregard for the people of this region and a clear preference for the applicant and its financial backers. My final request today is to ask you to reject industrial uses for this land and investigate more closely plans similar to Alternate Project 4. There is no benefit for the public in the draft EIR as presented today, only the piecemealed and predatory nature of venture capitalism and the champagne vision of a few rich men. Don't allow this act of poor land use planning be your lasting legacy as a public entity.

1-95.40

"Why should we tolerate a diet of weak poisons, a home in insipid surroundings, a circle of acquaintances who are not quite our enemies, the noise of motors with just enough relief to prevent insanity? Who would want to live in a world which is just not quite fatal?"

Jerry Shearer Riverside, CA 92508 jsydor@yahoo.com

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II.6 - RESPONSES TO INDIVIDUAL COMMENTS

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Response to Comment Letter I-95

Jerry Shearer July 19, 2024

- I-95.1 This comment is introductory in nature and contains a description of the Proposed Project, as well as the associated Proposed Project documents and studies. The document list in the comment also includes documents associated with other projects, such as the West Campus Upper Plateau Project. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.2 This comment clarifies the entities to which the commenter will refer for purposes of the letter. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- This comment contains general opposition to the Proposed Project and expresses dissatisfaction with March JPA's land use planning and management. The comment alleges piecemealing and generally references DHL and the West Campus Upper Plateau Project. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.⁸⁰ As of 2024, there were fewer than 20 DC-9s still in service.⁸¹ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.⁸² The Proposed Project is separate from the 2005–2008 DHL flights, which are no longer occurring.

CEQA requires the environmental analysis "examine the impacts of contemplated development...that are reasonably foreseeable consequences of the approval. ... Related activities that are similar in nature and that serve the same purpose are separate projects (as opposed to a single project) if they are independently considered for approval and one activity is not a foreseeable consequence of the other."

The Proposed Project and West Campus Upper Plateau Project are independent and neither project is a foreseeable consequence of the other. The Proposed Project does not require the West Campus Upper Plateau Project to operate, and vice versa. The March Joint Powers Commission denied the West Campus Upper Plateau Project on May 12, 2025. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.

This comment raises concerns regarding public outreach and input with regard to the Proposed Project. As discussed in Chapter 1, Introduction, of the EIR, there have been multiple opportunities for public comment on the Proposed Project over the last 3 years. The NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. During the 30-day public review period of the NOP, March JPA held a scoping meeting on April 14, 2021. All issues and concerns raised in the comments have been fully addressed and analyzed in this EIR. The Draft EIR was distributed for a 45-day public review from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days to provide

⁸⁰ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

⁸¹ https://simpleflying.com/dc-9-operators-2024/

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

Kostka, S., and M. Zischke. 2008. Practice Under the California Environmental Quality Act (2nd ed.). California: Continuing Education of the Bar.

time for additional public input (although not required by CEQA). The applicant held community meetings on June 18, 2024, July 1, 2024, and September 24, 2025. Further, all comments received are responded to in this Final EIR. The comment further expresses dissatisfaction with March JPA's performance in its role as a public service agency as compared to cats. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.

- I-95.5 This comment generally asserts that the EIR is inadequate, but does not provide any specific comments, questions, or concerns regarding the analysis. The comment further expresses general dissatisfaction with the Proposed Project and its environmental impacts.
- 1-95.6 This comment asserts that these plans (for the Proposed Project) are not consistent with the development of the local area because the Proposed Project sponsor, rather than March JPA or public, is determining what type of development should and will occur surrounding the March Airfield. The project site is designated Aviation under the March JPA General Plan, which allows uses such as "flightline, hangers, aviation support services, inclusive of fuel systems and dispensing, air cargo storage, passenger and air cargo terminals, fixed base operations, aircraft maintenance and aviation operation services."84 The comment further suggests other uses for "the plans," including homes, restaurants, parks, shopping centers, amusement parks, outlet malls, research facilities, and museums. Residential uses are not appropriate for the project site. As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, the project site is subject to Environmental Restrictive Covenants, which prohibit "residential, schools for persons under 18 years of age, day care, or hospital for human care." See Appendix J-2 of the EIR. Under the March JPA Development Code, Table 9.02.020-1, the Aviation zoning district does not allow residential uses. As discussed in Section 3.10, Land Use and Planning, of the EIR, under the March ARB/Inland Port ALUCP, the project site is located in the B2 Zone, which is subject to high noise and a moderate accident potential risk. The land uses prohibited within the B2 Zone include new dwellings, children's schools, daycare centers, libraries, hospitals, congregate care facilities, hotels/motels, places of assembly, buildings with more than three aboveground habitable floors, noise-sensitive outdoor nonresidential uses, critical community infrastructure facilities, and hazards to flight.
- I-95.7 This comment contains general opposition to the Proposed Project and general claims of errors, omissions, misrepresentations, and discrepancies in the EIR, but does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.8 This comment questions why March JPA's Final Reuse Plan does not include the expansion of airport operations as a primary mission of March JPA. This is incorrect. As stated in the March AFB Master Reuse Plan (p. IV-1)⁸⁵:

The creation of the civilian "joint use airport" became a centerpiece for the development of the Master Reuse Plan. The Environmental Impact Statement (EIS) evaluated all alternatives with some varying options of civilian aviation. As a policy decision, the Joint Powers Commission (JPC) never wavered from its desire to develop a joint use airport, and the creation of the facility primarily as a cargo airport has been

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March JPA (Joint Powers Authority). 1999. General Plan of the March Joint Powers Authority. https://www.marchjpa.com/documents/docs_forms/general_plan_updt_011718.pdf.

⁸⁵ March JPA (Joint Powers Authority). 1996. Land Use Plan: March Air Force Base Master Reuse Plan. Last revised October 2, 1996. Moreno Valley, California: March JPA.

the priority since the beginning of the planning process. Throughout that process, community support has been consistent and unwavering. ... In June 1997, the March JPC formally approved a strategy of creating an "inland port" concept at March AFB. This strategy recommended an aggressive business development campaign targeted at attracting private investment and development that would either be directly or indirectly related to air cargo carriers locating at a joint use airport.

The comment further questions why "fully utilizing the operations capacity of the MIP airport is a project objective now" and expresses the commenter's opposition to this objective. A lead agency has broad discretion to formulate project objectives. "CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives" (*California Oak Foundation v. Regents of the University of California* [2010] 188 Cal.App.4th 227, 277). The objectives for the Project were selected by March JPA, and MIPAA concurs, to develop a reasonable range of alternatives. CEQA Guidelines Section 15124(b) requires an EIR to include a statement of objectives sought by the project. These objectives are required to guide the lead agency to develop a reasonable range of alternatives in the EIR. In addition, the project objectives include the underlying purpose of the project and may discuss the project benefits. In support of the identified project objective, please refer to Appendix Q, Regional Air Cargo Capacity Overview, of this Final EIR.

The comment also suggests that the Proposed Project "is in direct conflict" with March JPA's "mission to redevelop the land around March ARB to revitalize the communities impacted by March's reduction in military operations." As discussed in Chapter 2, Project Description, one of the objectives of the Proposed Project is to "Provide increased job opportunities for local residents through the provision of employment-generating businesses." According to the applicant, the Proposed Project will have a project labor agreement with local unions. The Proposed Project is anticipated to generate approximately 150 permanent employment opportunities. It is anticipated that these new jobs would be filled by the existing residential population from the greater Riverside County area. According to the California Employment Development Department, for the third quarter of 2023, the average weekly pay in the Transportation and Warehousing sector in Riverside County was \$1,076, or \$55,952 annually. In addition to local employment opportunities, the Proposed Project would increase the March ARB/MIP Airport landing fee revenue and local tax revenue.

I-95.9 This comment asserts that the EIR omits clearly identified environmental justice goals. Table 3.10-1 in Section 3.10 of the EIR discusses the Proposed Project's consistency with eight separate policies of the March JPA General Plan's Environmental Justice Element. The Environmental Justice Element was modeled after the County of Riverside's environmental justice policies. The comment raises concerns regarding the burn areas on Site 7 and alleges there is no mitigation protecting environmental justice communities. Section 3.8 of the EIR provides extensive details regarding the hazards associated with Site 7 due to its prior use for firefighting training, crash rescue training, and waste burning and the ongoing monitoring and remediation efforts. The project site is subject to Environmental Restrictive Covenants (Appendix J-2 of the EIR). Activity and use limitations are in place at the project site, specifically for Parcel D-1 due to the location within Site 7. A portion of Site 7 is already occupied by existing development to the south of the project site and would not be disturbed. The Proposed Project would leave the portion of Site 7 that includes the burn areas undisturbed. As part of construction of the Proposed Project, expansion of the existing access roadway to the south of the project site would slightly overlap with Site 7; however, it would avoid the burn areas within Site 7. There are

Environmental Restrictive Covenants that apply to Site 7 and include notification of EPA and DTSC for specific activities at the project site. The Restrictive Covenants are enforceable by the State of California, U.S. Department of Air Force, and EPA. MM-HAZ-1 (Hazardous Materials Contingency Plan) requires preparation and approval of an HMCP that includes procedures for evaluation of contaminated soils and soil vapor, as well as procedures to handle any hazardous materials identified in these environmental media. The HMCP would be submitted to EPA and DTSC for review/approval prior to the start of construction for review of the protective measures during work within Site 7. MM-HAZ-2 (Stop Work, Groundwater Management) requires work to stop if groundwater is encountered and regulatory authorities to be contacted. These measures protect the nearby communities.

Further, in response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project now includes a parcel map to subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11, Tentative Parcel Map, in the Final EIR). The western developable parcel would encompass the Air Cargo Component of the Project and exclude all of Site 7. The eastern constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment and its addition does not change the analysis in the EIR.

The comment references litigation and requests that March JPA withdraw the EIR until a new environmental justice policy is approved. On May 29, 2024, R-NOW and Center for Community Action and Environmental Justice filed a petition for writ of mandate, challenging the Environmental Justice Element (Riverside Superior Court Case No. CVRI2402936). This litigation has not yet been resolved. The Environmental Justice Element remains valid, and the EIR provides a consistency analysis thereof.

Inis comment generally alleges piecemealing associated with "adopting a General Plan amendment for this Specific Plan that relies on the passing or existence of another projects [sic] that will cause environmental harm." However, the Proposed Project does not involve a General Plan amendment or a Specific Plan adoption. Please refer to Response I-95.3, above, for a piecemealing discussion. The comment suggests the EIR's impact determinations of less than significant with mitigation or significant and unavoidable are improper and that development should have no impact or less-than-significant impact. The purpose of the EIR is to identify potential significant and unavoidable impacts and thus inform, per CEQA processes, interested parties and decision-makers regarding if and under what conditions the Proposed Project would proceed.

Under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions. As stated in CEQA Guidelines Section 15093, Statement of Overriding Considerations, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'"

I-95.11 This comment disagrees with the Civil Grand Jury report, which found that March JPA involves the community in its decisions. The comment asserts the Proposed Project would increase flights by 10,608 per year and suggests that number could be higher. For clarification of terminology, a "flight" is composed of two flight operations: a take-off and a landing. The numbers referenced by the comment relate to flight operations, not flights. The Chapter 2 of the EIR has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR. The Proposed Project would be limited to the flight operations as approved.

Finally, the comment states disappointment with March JPA and public input at the community meetings on June 18 and July 1 and alleges community feedback would not be included in the Final EIR. The intent of those meetings was to provide an overview of the Proposed Project. During the meeting, it was requested that all comments be submitted in writing during the public review period, which ended on July 22, 2024. All issues and concerns raised in the written comments have been fully addressed and analyzed in this Final EIR. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-95.12 This comment requests March JPA implement a community advisory committee. Creation of an advisory group is outside the scope of CEQA. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.13 This comment discusses privatization of public lands surrounding March ARB and throughout Southern California and suggests the applicant is requesting a development agreement. The Proposed Project does not involve a development agreement. The comment quotes a definition of development agreements from a manual published by the Institute for Local Self-Governance. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.14 This comment references comments made regarding a separate project's EIR and repeats concerns around the "25-year exclusive agreement to develop the land around March ARB." The comment further asserts that March JPA does not follow certain guidelines relating to periodic review of development agreements. It appears the comment is referencing the West March Development and Disposition Agreement, which does not include the project site and is not a component of the Proposed Project. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.15 This comment quotes additional guidance on development agreements from the manual published by the Institute for Local Self-Governance and questions if the Proposed Project will require an additional development agreement. The Proposed Project is not seeking a development agreement. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.

- I-95.16 This comment characterizes March JPA's responsibilities under the General Plan and questions how implementing 21,000 civilian flights achieves the General Plan goals. For clarification of terminology, a "flight" is composed of two flight operations: a take-off and a landing. The numbers referenced by the comment relate to flight operations, not flights. As discussed in Response I-95.8, above, creation of a joint use airport has been an ongoing priority of MIPAA. There are numerous General Plan goals and policies supporting the development and expansion of March Inland Port Airport. For example, Land Use Element Goal 7 directs March JPA to "Maximize the development potential as a regional Intermodal Transportation facility to support both passenger and freight-related air services." Land Use Element Policy 7.1 states "Establish an air cargo operation and goods distribution center to serve local, regional, national, and international needs." The Proposed Project is in line with the long-term vision for March Inland Port Airport. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.17 This comment again asserts a "piecemealed approach to project planning" but does not further elaborate on that claim. For a discussion regarding piecemealing, please refer to Response I-95.3, above. The comment alleges the Proposed Project's General Plan consistency findings in Table 3.10-1 of the EIR are contractor focused and do not reflect input from local communities, residents, or their environmental justice constituents and requests that March JPA explore more diverse land uses for the area. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-95.18 This comment questions whether the payment of fair-share costs (PDF-TRA-1) is sufficient to fund the Proposed Project's fair share of road extension and improvements to Heacock and questions the City of Moreno Valley's position on the extension costs. As requested by the City of Moreno Valley, the proposed Heacock Street extension south of the existing terminus at Nandina Avenue to Harley Knox Boulevard was included in the joint Scoping Agreement (included as Appendix 1.1 in Appendix M-1, Traffic Analysis, of the EIR); however, it is not feasible to provide a new roadway extension along the Heacock Street alignment connecting to Harley Knox Boulevard within a potential crash zone. March ARB does not support the extension of Heacock Street to the south. The proposed Heacock Street extension south of the existing terminus at Nandina Avenue to Harley Knox Boulevard is located within the Clear Zone for March ARB Runway 14/32 (see Figure 5-2 of the March ARB 2018 AICUZ). The Clear Zone "is required for all active runways and should remain undeveloped." This restriction is further implemented through Table MA-2 of the March ARB/MIP Airport ALUCP, which requires all existing open land to remain undeveloped.

Contrary to the comment's assertion, PDF-TRA-1 does not include extension of Heacock Street. In response to a request from the City of Moreno Valley (see Response A-6.11), PDF-TRA-1 has been revised to include a fair-share contribution for pavement maintenance for specified roadways over a

⁸⁶ March JPA 1999.

⁸⁷ March JPA 1999.

⁸⁸ March ARB. 2018. Final Air Installations Compatible Use Zones Study March Air Reserve Base. February 2018. Accessed June 18, 2020. https://www.march.afrc.af.mil/Portals/135/documents/MARCH_AICUZ_2018.pdf?ver=2018-02-21-161029-473.

30-year cycle. Although project design features 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). MIPAA will monitor compliance through the MMRP. Please see Chapter IV, MMRP, of this Final EIR for the revised language of PDF-TRA-1. The comment asserts that the EIR does not indicate the date of the estimate and does not contain a total estimate to determine whether the amount is sufficient. As noted in Section 3.12.9, Traffic Analysis (Non-CEQA Analysis), in Section 3.12, Transportation, of the EIR, the fair-share calculation for the Proposed Project was determined and included in Table 1-5 of the Traffic Analysis (EIR Appendix M-1, dated July 19, 2023). Table 1-5 of the Traffic Analysis also includes the full estimate for the identified improvements. The comment questions why there fair-share cost does not include traffic patrol and monitoring by the Riverside Sheriff. The fair-share costs relate to construction costs of public infrastructure, not ongoing public services. As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project's impacts to police services would be less than significant.

- This comment notes that the site surveys for Site 7 and biological resources in the appendices of the EIR are from 2020 and 2021 and questions whether such surveys are still relevant. As discussed in Section 3.3, Biological Resources, of the EIR, the project site is a vacant parcel in a heavily developed environment and is routinely mowed. With regard to special-status plants, the surveys were conducted following a normal rainfall year, which would be expected to support increased germination of annual species, if present at the project site. With regard to special-status wildlife, MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures) through MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures) require pre-construction surveys and a biologist on site to perform daily monitoring during initial vegetation removal and ground-disturbing activities. It is unclear what Site 7 survey the comment is referring to, as the Proposed Project's Phase I Environmental Site Assessment is dated February 19, 2024.
- I-95.20 This comment expresses concern that JPA's airport EIR allows for a high number of commercial flights and the Proposed Project allows for fewer flights. For clarification of terminology, a "flight" is composed of two flight operations: a take-off and a landing. The numbers referenced by the comment relate to flight operations, not flights. It appears the comment is referring to the Joint Use Agreement, which identifies 21,000 flight operations. As shown in Table 3.11-3 of the EIR, there were 4,972 civilian flight operations and 22,626 military flight operations in 2022. The Proposed Project would be limited to 10,608 flight operations annually. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). The comment speculates there will be more flights added in the future but provides no evidence to substantiate this claim. The comment questions the need for additional air cargo capacity. In response, please refer to Appendix Q of this Final EIR. The comment further questions the entity responsible for monitoring the total number of allowable civilian flights for the airport. MIPAA tracks the time and numbers of flight operations to monitor compliance.
- I-95.21 This comment questions the entity responsible for monitoring flight numbers to ensure that flights do not exceed the 10,608 flights studied in the EIR. For clarification of terminology, a "flight" is composed of two flight operations: a take-off and a landing. The numbers referenced by the comment relate to flight operations, not flights. MIPAA tracks the time and numbers of flight operations to monitor compliance.

- This comment questions why the EIR does not include flight projections for other airport uses, including future flights for the Riverside Sheriff, flights associated with military use, and flights associated with remotely piloted aircraft. The comment further alleges that the list of military planes in Table 3.11-3 of the EIR is incomplete in that it should have included F-22 Raptor routine training flights, as well as other visiting military cargo, refueling, and fighter jets. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. These were the best available comprehensive data. Inclusion of potential Sheriff aviation operations is speculative at this point as the Sheriff's Department is continuing to do due diligence and extended the exclusive negotiation agreement recently.⁸⁹
- I-95.23 This comment asserts that the EIR is deficient in noise monitoring studies and lacks accurate data on all flights in the area. As discussed in Response I-95.22, above, the EIR utilized the noise modeling from the January 2024 Revised Draft KC-46A EIS, which was the best available comprehensive data. The comment goes on to generally insinuate that this constitutes piecemealing of data, without providing specifics.
- This comment generally asserts that the noise levels identified in the EIR measure flight noise data for military aircraft, which differ from freight planes. As discussed in Response I-95.22, above, the EIR used the noise modeling from the January 2024 Revised Draft KC-46A EIS, which was the best available comprehensive data. The comment asserts that more accurate noise impact assessment and mitigation is required under the EIR because factors, such as weight of the plane, current state of the aircraft, and weather, were not considered in the study and results. As discussed in Section 3.11, Noise, of the EIR, aircraft flight operations associated with the Proposed Project were modeled using the FAA AEDT, Version 3e, to generate aircraft noise contours. Because there is no proposed tenant at this time, the proposed flight operations scenarios analyzed in the EIR reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. Contrary to the comment's assertions, the EIR accurately assessed the Proposed Project's aircraft noise impacts.
- I-95.25 This comment alleges the EIR does not include noise measurements of aircraft flight paths over surrounding neighborhoods. As discussed in Section 3.11 of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. As detailed in EIR Table 3.11-2, the EIR provides existing noise measurements for four locations in surrounding residential areas. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, more distant residential neighborhoods, such as Mission Grove, and Orangecrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MO-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904).

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March JPA. 2024. "Notice of a TAC Meeting." October 31, 2024. https://marchjpa.com/wp-content/uploads/2024/10/11-04-2024-TAC-Packet.pdf.

The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the proposed Project's aircraft noise would not expand the 60 dBA contour line over or near other residential neighborhoods.

- I-95.26 This comment questions the enforcement of the tenant agreement requirements of MM-AQ-3(C) (Improved Energy Efficiency and Water Reduction). As required by MM-AQ-6 (Additional Air Quality Tenant Requirements), a copy of the MMRP will be attached to each tenant lease agreement. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR. Additionally, MIPAA tracks the time and numbers of flight operations to monitor compliance. MIPAA will also continue enforcement of the MMRP as the airport operator.
- I-95.27 This comment expresses general concern with the relocation and mitigation plans and "a disappointment that humans are eager to move one species to a new home when their current home interferes with 'progress.'" The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.28 This comment indicates the commenter's general disagreement with the significance findings associated with the Proposed Project and the alternatives identified in Table ES-2 of the EIR. The comment further questions why the alternatives included in the EIR were chosen and notes that the Proposed Project, as well as two of the alternatives, would have significant and unavoidable impacts to air quality and noise pollution. Pursuant to CEOA Guidelines Section 15126.6(a), an EIR is required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project." A lead agency has broad discretion to formulate project objectives. "CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives" (California Oak Foundation v. Regents of the University of California [2010] 188 Cal.App.4th 227, 277). The objectives for the Proposed Project were selected by March JPA, and MIPAA concurs, to develop a reasonable range of alternatives. CEQA Guidelines Section 15124(b) requires an EIR to include a statement of objectives sought by the project. These objectives are required to guide the lead agency to develop a reasonable range of alternatives in the EIR. In addition, the project objectives include the underlying purpose of the project and may discuss the project benefits. As discussed in Response I-95-10, above, under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts.
- I-95.29 This comment generally disagrees with the thresholds used to evaluate light and glare impacts in EIR Section 3.1, Aesthetics, and the EIR's determination of less-than-significant impacts. The commenter requests that March JPA consider alternative projects and engage with the public and act on their complaints and requests. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations

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DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft% 20EIS%20Chapters%201-6.pdf.

by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details.

- I-95.30 This comment expresses general opposition to the Proposed Project and suggests the EIR does not comply with CEQA because it identifies significant and unavoidable impacts. As discussed in Response I-95-10, above, under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts.
- I-95.31 This comment expresses general concern with significant irreversible changes associated with the Proposed Project identified in Section 4.4, Significant Irreversible Changes, of the EIR and alleges the Proposed Project would negatively impact workers. For a discussion of jobs and wages, please refer to Response I-95.10, above.
- It is comment expresses concern with the types of jobs that will be provided by the Proposed Project and March JPA generally. For a discussion of jobs and wages, please refer to Response I-95.10, above. The comment further expresses commenter's opinion that the Proposed Project "does not enrich the community" and that alternate plans must be considered. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III of this Final EIR for details.
- I-95.33 This comment again asserts that the range of alternatives considered, specifically the range of alternatives considered but rejected, is narrow. For a discussion regarding selection of alternatives, please refer to Response I-95.28, above.
- I-95.34 This comment asserts that March JPA is "compelled to choose the environmentally superior alternative project" whenever it can. The comment further expresses the commenter's opinion of March JPA's moral obligations. As discussed in Response I-95-10, above, under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts.
- 1-95.35 This comment raises general concerns regarding public input. In response, please refer to Response I-95.4, above. Additionally, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.36 This comment requests that March JPA establish an official community benefits program and fund to pay for several items for which the commenter cites no support or evidence that the Proposed Project will impact, including repair and cleaning of HVAC and heating units near the project site and flight path, repair of damage to various homes near the project site and flight path, and other items. The commenter suggests that an appropriate amount for this community benefit fund is \$50,000,000 to \$60,000,000. The commenter indicates that the community benefit fund is necessary due to the commenter's own experience requesting assistance with such items from March JPA. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.

- Inis comment requests that March JPA significantly reduce the number of flights allowed in total as a result of the Proposed Project. The comment raises no specific issues, questions, or concerns about the analysis in the EIR. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-95.38 This comment requests that March JPA significantly increase the Proposed Project's fair share of Heacock expansion costs to reflect inflation and increased costs in materials and labor. As discussed in Response I-95.18, above, extension of Heacock Street is unlikely due to March ARB and ALUCP restrictions. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-95.39 This comment summarizes the commenter's purpose and hopes in submitting the comment letter and expresses the commenter's opinion of March JPA's land use planning practices. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-95.40 This comment again expresses the commenter's concerns and opinion of March JPA's oversight and land use planning practices. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.

Comment Letter I-96

Public comment on SCH 20210400012 - Meridian D1-Gateway Aviation Center

Michael McCarthy < MikeM@radicalresearch.llc>

Mon 7/22/2024 8:08 AM

To:Jeffrey Smith <smith@marchjpa.com> Cc:jsydor@yahoo.com <jsydor@yahoo.com>

1 attachments (563 KB)

Aviation_comments.pdf;

Mr. Smith,

Attached please find public comment on the DEIR of the Meridian D1-Gateway Aviation Center. Please confirm receipt of this email and public comment.

Thank you.

Mike McCarthy

Riverside Neighbors Opposing Warehouses 92508

July 19, 2024
Mr. Jeffrey M. Smith AICP
Principal Planner
March Joint Powers Authority (March JPA)
14205 Meridian Parkway, Suite 140
Riverside, CA 92518

RE: Public comment on record for the draft Meridian D1-Gateway Aviation Center Project, Environmental Impact Report, State Clearinghouse No. 20210400012

Dear Mr. Smith,

My name is Mike McCarthy and I am a member of a grassroots community group called Riverside Neighbors Opposing Warehouses (RNOW). RNOW is broadly concerned with the regional oversaturation of warehouses in the 215/60 corridor.

The Meridian D-1 Gateway Aviation Center Project ('Project') is yet another warehouse project proposed by the March Joint Powers Authority (MJPA). This project is fundamentally unreasonable given the extreme oversaturation of warehouse land-uses already approved and planned for in the Inland Empire. It relies on incorrect and unsubstantiated claims of needs for additional airport cargo facilities as the basis for the project. It is inconsistent with Air Quality Management Plan goals, Noise elements, Greenhouse gas, and environmental justice components of the project. It relies on omitting adjacent past, present, and future warehouse project impacts from its analysis, and excludes the joint-use military facility emissions from its health risk assessment.

1-96.2

Here are a few areas I found reading the draft EIR and the associated appendices for air quality, greenhouse gas emissions, noise, project overview, and cumulative impacts.

Project Objectives – Section 2.3

The project's first objective is:

More fully utilize the operations capacity of the MIP Airport to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region.

This objective is not substantiated with any evidence that (1) there is regional demands for air cargo services that are unmet and (2) that building a new air cargo warehouse will alleviate congestion within the greater region.

1-96.3

The FAA publishes cargo flight statistics annually and multiple airports in Southern California are among the top 100 cargo airports in the country by weight. As shown in **Table 1**, Los Angeles International (LAX) is about 60% of regional freight at ~10 billion pounds, followed by Ontario International (ONT) at about 30% (5 billion pounds) and San Bernardino International (SBD) at about 5% (1 billion pounds) but growing fast. Other airports, including San Diego Internation (SAN), March (RIV), John Wayne International (SNA) and Long Beach (LGB) are each around 1-2% of the total. Table 1 shows stats through 2022, the latest published year of data. Regionally, LAX, ONT, and RIV all had substantial drops

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in cargo in 2022 – only SBD grew. The total regional change was down by over 10%. Individual stats published on airport websites and in trade journals indicates that in 2023, LAX cargo dropped another 14%, ONT dropped 7%, and SAN dropped 15% - stats for SBD and RIV have not been published to the best of my knowledge. Notably, RIV cargo peaked in 2020 and has dropped in subsequent years from 406M pounds to 271M pounds. If there is 'congestion' and 'regional demands', why are the existing RIV facilities not being used at capacity in recent years?

Table 1. FAA cargo stats in calendar year all-cargo landed weight (pounds).1

Year	LAX	ONT	SBD	SAN	RIV	SNA	LGB	Total Cargo Regional
2022	1.15E+10	5.20E+09	1.33E+09	6.49E+08	2.71E+08	1.21E+08	1.11E+08	1.92E+10
2021	1.48E+10	5.34E+09	8.73E+08	6.94E+08	3.81E+08	1.21E+08	1.08E+08	2.23E+10
2020	1.32E+10	5.22E+09	4.68E+08	6.74E+08	4.06E+08	0.00E+00	1.13E+08	2.01E+10
2019	7.46E+09	4.49E+09	3.51E+08	6.13E+08	3.50E+08	0.00E+00	1.68E+08	1.34E+10
2018	7.32E+09	4.20E+09	1.82E+08	6.05E+08	6.03E+07	0.00E+00	1.68E+08	1.25E+10

I-96.3 Cont.

It is also true that ONT airport recently approved construction of the South Airport Cargo Center (SCH #2021100226), an 858,000 square foot cargo sorting building and the SBD airport recently completed a 'state-of-the-art' Amazon Air Hub totaling 700,000 square feet in 2021.

Therefore, this project is an attempt to regain lost market share from local competitors at ONT and SBD. That does not meet any regional needs.

The economic project objectives 'anticipating' market demand are flat wrong and assume continued massive growth in trade from Asia during a time of global geopolitical decoupling, onshoring, and near-sourcing. And the warehouse sector has been in the doldrums, with warehousing, wholesale trade, and trucking jobs in the IE declining by 9% since November 2021 as shown in **Figure 1**.

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¹ https://www.faa.gov/sites/faa.gov/files/2022-08/cy21-cargo-airports_0.pdf

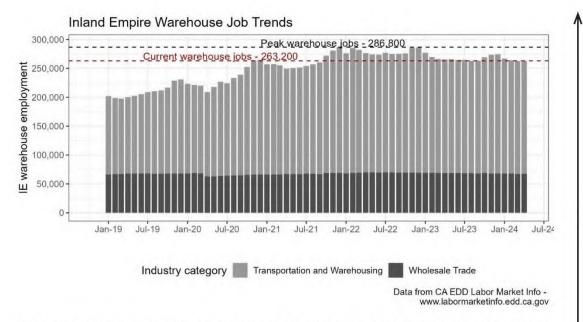


Figure 1. Inland Empire warehouse job trends from 2019 through April 2024 from CA EDD Labor Market Information data. Current warehouse jobs are 23,600 below the peak, despite continued warehouse growth in the region over the past 3 years.

This is not a unique opportunity for economic development – it is more of the same bad land use plaguing our region's air quality and clogging our freeways.

Air Quality

The Draft EIR minimizes and gaslights the community on the air quality impacts of this project. First, it uses the incorrect $PM_{2.5}$ annual standard in Tables 3.2-1 and 3.2-3 in the EIR. EPA revised the national annual $PM_{2.5}$ standard to 9.0 g/m^3 in 2024^2 .

The project admits on p. 3.2-29 that 'Aircraft emissions compose the vast majority of the Proposed Project's emissions and there are no feasible mitigation measures to reduce aircraft emissions.' This of course provides the opportunity to manage regional demand by not adding more aircraft flights through demand management strategies. If this project is built, it will induce aircraft emissions which are significant and unavoidable. Not building the project is the best way to control those emissions. If the project applicant wants to argue that the flights will just go to another regional airport, then it is admitting its project objective is a lie and it is simply trying to regain regional market share from an inelastic market that is not capacity constrained.

The Project Health Risk Assessment only includes a few sensitive receptor sites (R1-R8) that omit residents in Green Acres and the US Vets Facility who live closer to the taxiway area. Please add sensitive receptor locations for the sites closer to the taxiway who will be impacted by aircraft emissions of formaldehyde and acetaldehyde.

1-96.3

Cont.

1-96.4

1-96.5

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^{|-96.6}

² https://www.epa.gov/criteria-air-pollutants/naaqs-table

The project fails to include any analysis of cumulative impacts in its HRA, despite having a list of 40 other projects around the proposed project. Moreover, the cumulative impacts list is incomplete because it ignores the joint-military use of the airport (military emissions) and other large regional projects such as the World Logistics Center, Stoneridge Commerce Center, the March North Business Center, and dozens of other smaller existing warehouses within a 5 mile radius of the project. As a result, the diesel PM emissions and cumulative impacts of the Industrial Park around the March Air Base designed and perpetuated by MJPA and its member agencies is underestimated by a factor of 50.

1-96.7

Greenhouse Gas Emissions

The Draft EIR erroneously calculated GHG emissions for aircraft. It only includes the takeoff and departure emissions below 3,000 feet. That is appropriate for ground level air quality. It is not appropriate for GHG emissions which are global in scope. The project only calculated that each of its flight 5,304 flights burns ~300 gallons of jet fuel. A 767-300ER has a fuel tank of 24,000 gallons and can fly about 6,000 nautical miles — or 4 gallons/mile. I don't think an average cargo flight is only 75 miles. Let's assume the average cargo flight is to Chicago — about 2,000 miles away. That would be 8,000 gallons of fuel one way, and another 8,000 gallons of fuel back. The US Energy Information Administration indicates that there 21.5 pounds of CO₂ emitted per gallon of jet fuel³. Thus, each flight would emit 21.5 pounds per gallon*8,000 gallons/2000 lbs per ton — or 86 tons of CO₂. There are 10,608 flights per year — so aircraft emissions are 86 tons per flight * 10,608 flights = 912,288 tons of CO₂ per year — or just short of a million tons per year from adding this cargo facility.

1-96.8

Note that the project claims that the total aircraft emissions of CO_2 are 16,523 tons of CO_2 per year – underestimating the true value by a factor of 55. The underestimation is incompetence by the consultant but it is possible that this is professional misconduct. Dude.

Given that we are experiencing the hottest year of our lifetime and that the planet's oceans are about 0.75 degree Celsius warmer than the climatological 1982-2011 mean as shown in **Figure 2**, it would be great if our local governments wouldn't try to melt all the worlds icecaps by adding unneeded cargo aviation.

1-96.9

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³ https://www.eia.gov/environment/emissions/co2_vol_mass.php

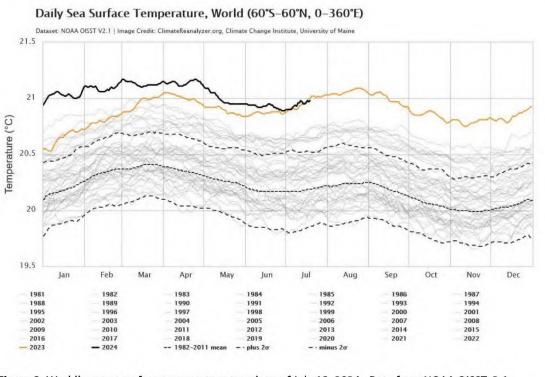


Figure 2. World's ocean surface temperature trends as of July 18, 2024. Data from NOAA OISSTv2.1, image from ClimateReanalyzer.org, Climate Change Institute, University of Maine.

In addition, the March JPA is missing a climate adaptation plan as required by state law under SB 379 to be implemented by January 1, 2022. The County plan is not appropriate to incorporate by default.

Noise

The project's noise analysis is fatally flawed and needs to be completely redone.

- Baseline noise measurements were made May 20, 2020 during the COVID-19 state and county lockdown4. However, the consultant claims these were 'typical weekday conditions' on p 3.11-7. Dude.
- The project flight path modeled noise along a straight takeoff and departure path. That is completely inaccurate, as the flight path is 99% a left-turn after takeoff over Sycamore Canyon, Mission Grove, and Orangecrest.
 - Thus the project omits any cumulative impact noise analysis over residents in the City of Riverside, despite known significant and unavoidable impacts from the proposed West Campus Upper Plateau project5
 - This is classic piecemealing, and a violation of CEQA requirements for cumulative impacts analysis

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1-96.9

Cont.

1-96.10

1-96.11

1-96.12

⁴ https://riversideca.gov/press/state-county-and-local-orders

https://marchipa.com/wp-content/uploads/2024/05/M-1.-Noise-Study.pdf

- The project does not include the possibility that the Riverside County Sheriff's department will
 move its helicopter operations to March ARB.
- The March Inland Port Airport Authority on August 23, 2023 authorized an Exclusive Negotiation Agreement on parcel D-1 item 11⁶ with the Riverside County Sheriff's Department.
 - The Exclusion Negotiation Agreement runs through August 23, 2024, with a possible 60 day extension.
 - The helicopter operations of the Sheriff's Department would potentially use up civilian flight operations and would cause noise impacts
 - o No analysis of the possible noise, flight operations, or mention of this ENA is in the DEIR
 - The impacts of this project need to be discussed or at least included as a possible cumulative impact on base operations, noise, hazard/safety, and air quality. If the project is unlikely to occur, the DEIR needs to put conditional approvals in place to mitigate impacts if the Sheriff's helicopter facility moves forward
- The project fails to include cumulative impacts from additional truck activity from newer
 warehouses built since May 2020 when the noise baseline measures were taken. There were
 61M SQ FT of warehouses built by 2020 and an extra 15M SQ FT built since then⁷ based on
 WarehouseCITY v1.20 built year dates. These warehouses were not included in the cumulative
 impact modeling of warehouse and traffic noise study by the consultant. Note these numbers
 do not include current approved and under construction warehouses that will add another 10M
 SQ FT.

The noise analysis relies on pandemic shutdown period noise baseline as 'typical conditions' and fails to include the accurate flight path, cumulative impacts of warehouse projects along that flight path, and the cumulative impacts of known and potential future projects that will increase noise along the entirety of the perimeter of the airfield and along the flight path. The entire noise study is an exercise in incompetence.

Summary

The project ignores the new Environmental Justice element, adds to our regional air quality problems, exacerbates GHG emissions, and will add significant noise via aircraft operations. It has a significant impact on the community and none of it is mitigatable.

What good does it do? It brings a few jobs and might make a freight company like Amazon, FedEx, UPS, or DHL some money. It certainly doesn't help the region or the community.

This project is just porting the negative externalities of pollution, noise, and GHG emissions onto frontline communities while exploiting public resources for private profits. I do not think that is a valuable proposition. Please consider dropping this project as it won't be competitive with the other facilities at SBD and ONT.

Mike McCarthy, PhD

92508

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1-96.13

1-96.14

1-96.15

1-96.16

⁶ https://marchjpa.com/wp-content/uploads/2023/08/08-23-23-JPC-Packet-final.pdf

⁷ https://radicalresearch.shinyapps.io/WarehouseCITY/

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Response to Comment Letter I-96

Mike McCarthy July 19, 2024

- **I-96.1** This comment is a transmittal email. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-96.2 This comment provides general opposition to the Proposed Project and summarizes the issues and concerns raised in the comment letter. Specific issues are addressed in Responses I-96.3 through I-96.16, below.
- This comment alleges the Proposed Project's first objective "is not substantiated with any evidence that (1) there is regional demands for air cargo services that are unmet and (2) that building a new air cargo warehouse will alleviate congestion within the greater region," citing FAA cargo flight statistics. A lead agency has broad discretion to formulate project objectives. "CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives" (California Oak Foundation v. Regents of the University of California [2010] 188 Cal. App. 4th 227, 277). The objectives for the Proposed Project were selected by March JPA and, as the lead agency, March JPA was within its discretion to identify and pursue the selected project objectives. MIPAA concurs. In response, please refer to Appendix Q, Regional Air Cargo Capacity Overview, of the Final EIR.
- Inis comment asserts that the EIR uses the incorrect PM_{2.5} annual standard in Tables 3.2-1 and 3.2-3 of the EIR, indicating that EPA revised the national annual PM_{2.5} standard to 9.0 ug/m³ in 2024. Table 3.2-1 has the PM_{2.5} standard applicable for the timeframe (2020–2022). Table 3.2-3 has been updated to include this information. Please see Chapter III, Errata, of this Final EIR. As explained in the EIR (Table 3.2-2), the South Coast Air Basin was out of attainment for PM_{2.5} prior to this change, as was Riverside County. Therefore, the revised NAAQS does not change any of the conclusions in the EIR. SCAQMD has not published revised ambient air quality standards for PM_{2.5}, which are currently 10.4 μg/m³ for construction and 2.5 μg/m³ for operation. SCAQMD has also not revised its criteria pollutant threshold of significance for PM_{2.5}. These impact conclusions would not change based on the EPA's recent action. SCAQMD will develop a plan to achieve compliance with the revised NAAQS and will determine what measures are necessary to implement. Any SCAQMD measures that apply to the Proposed Project will be implemented pursuant to regulatory requirements.
- I-96.5 This comment correctly notes that the EIR indicates that "Aircraft emissions compose the vast majority of the Proposed Project's emissions and there are no feasible mitigation measures to reduce aircraft emissions." The comment asserts that not building the Proposed Project is the best way to control those emissions. As required by CEQA, a No Project Alternative was analyzed in the Chapter 5, Alternatives, of the EIR. The alternatives analysis determined that the No Project Alternative would not meet the objectives of the Proposed Project. With regard to regional demand, please refer to Appendix Q of the Final EIR.
- I-96.6 This comment suggests that additional sensitive receptor locations "for the sites closer to the taxiway who will be impacted by aircraft emissions of formaldehyde and acetaldehyde" should be added to the HRA for the Proposed Project. Section 3.2, Air Quality, of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In

addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in EIR Table 3.2-13, the Proposed Project would not exceed the SCAQMD LSTs during construction with the incorporation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14, the Proposed Project would not exceed the SCAOMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction and operation. The Proposed Project HRA (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The calculations in the HRA are based on established scientific methods and data. These include exposure assessments, dose-response relationships, and toxicological data, all of which are rigorously derived and validated. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from construction with the incorporation of MM-AQ-1 or from operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. All other receptors, including Green Acres and the U.S. Veterans Village, would experience less risk than what is identified in the EIR during construction and operational activity.

- I-96.7 This comment asserts that the HRA does not include any analysis of cumulative impacts while also asserting that the cumulative impacts list is incomplete. 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. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. Because the Proposed Project would not exceed the applicable cancer and non-cancer significance thresholds, TAC emissions generated by the proposed Project would not be considered cumulatively considerable. As discussed in Chapter 3, Environmental Analysis, of the EIR, the cumulative projects list was developed through consultation with planning and engineering staff from March JPA, the City of Riverside, the City of Moreno Valley, the City of Perris, and the County of Riverside to include key projects in their respective jurisdictions.
- I-96.8 This comment asserts that the EIR erroneously calculated GHG emissions for aircraft by only including takeoff and departure emissions below 3,000 feet. As disclosed in Section 3.7, Greenhouse Gas Emissions, of the EIR, in accordance with CEQA Guidelines Section 15064.4, GHG emissions resulting from construction and operation of the Proposed Project were quantitatively estimated and are provided for informational purposes. Because there is no proposed tenant at this time, ultimate destinations of the Proposed Project's flights are unknown, and flight distances would be speculative. As such, the EIR discloses aircraft GHG emissions to the mixing level, which is the altitude in the atmosphere up to which pollutants and other atmospheric constituents are mixed due to turbulence. In atmospheric modeling for aircraft emissions, the general mixing height is typically around 3,000 feet above ground level. The aircraft emissions were prepared with the FAA AEDT modeling tool to estimate emissions associated with take-off (climb below mixing height) and landing (descend below mixing height). During the climb below phase, the aircraft is still within the lower atmosphere where pollutants can have a more direct impact on air quality and noise levels at ground level. During the descend below mixing height phase, the aircraft emissions are more likely to impact air quality at ground level because they are within the layer of the atmosphere where pollutants are mixed.

- **I-96.9** This comment expresses general concern around global warming and the effects of "adding unneeded cargo aviation" thereon. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- 1-96.10This comment asserts that March JPA does not have a climate adaptation plan as required by SB 379 and that the "County plan is not appropriate to incorporate by default." SB 379 was passed in 2015 and amended Government Code Section 65302(g) to require cities and counties to review and update the safety elements of their General Plans "as necessary to address climate adaptation and resiliency strategies applicable to the city or county." March JPA reviewed the climate adaptation and resiliency vulnerability assessment⁹¹ that was prepared for the WRCOG. March JPA is a non-voting member of WRCOG, and the WRCOG vulnerability assessment covered the entirety of the March JPA Planning Area. The vulnerability assessment evaluated impacts of climate change on agricultural pests and diseases. air quality, drought, extreme heat, flooding, human health hazards, landslides, and wildfire. The March JPA Planning Area is not in an area identified with a risk of flooding, landslides, or wildfire in the WRCOG assessment. The March JPA Planning Area is not identified as having any climate change impacts to agricultural pests and diseases, air quality, drought, extreme heat, or human health hazards that differ from all of WRCOG; more specifically, impacts from the March JPA Planning Area are the same as for Riverside County. WRCOG's vulnerability assessment indicating that there are no climate change safety risks particular to March JPA Planning Area is consistent with the vulnerability assessment prepared by Riverside County and included in its General Plan Safety Element (see Figures 1 through 14),92 Based on review of the WRCOG's vulnerability assessment, March JPA determined it was not necessary to update the March JPA Safety/Risk Management Element. The comment further alleges is not appropriate for March JPA to reference the County plan but provides no evidence or support to substantiate this claim.
- I-96.11 This comment suggests the noise analysis improperly relies on pandemic shutdown period noise baseline as "typical conditions." In fact, the L5 position was measured in February 2021 and thus during a time when many (if not all) of the initial COVID response health orders had been lifted and corresponding traffic volumes were back to normal. The ambient noise levels at L5 are comparable to those measured at L1-L4. Tables 3.11-33 and 3.11-34 of the EIR, which are part of the Proposed Project's operational noise assessment, use the daytime and nighttime samples to evaluate increases during associated hours—not 24-hour periods; hence, if the 2020-era samples were measurably lower than what would be collected during pre- or post-COVID conditions, then their usage in this manner would be conservative, since these two tables evaluate decibel increase over ambient as a result of adding Proposed Project operation noise logarithmically to a plus-project ambient level. A lower preproject ambient level means these decibel increases would be higher and were still found to be less than significant. Roadway traffic noise and aviation noise assessments using CNEL as the applicable metric, as presented in the EIR, do not rely on these sample outdoor ambient measurements and instead depend upon corresponding roadway traffic noise model and aviation noise model scenarios with existing conditions based on the EIR Traffic Analysis (Appendix M-1) and the KC-46A EIS.

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

WRCOG (Western Riverside Council of Governments). n.d. Western Riverside Adaptation and Resiliency Strategy: Part 1, Vulnerability Assessment. Accessed April 2025. https://wrcog.us/DocumentCenter/View/7478/Western-Riverside-Adaptation-and-Resiliency-Strategy_Vulnerability-Assessment.

⁹² County of Riverside. 2021. General Plan: Safety Element. Revised September 28, 2021. https://planning.rctlma.org/sites/g/files/aldnop416/files/migrated/Portals-14-genplan-2021-elements-Ch06-Safety-092821.pdf.

I-96.12

This comment asserts that the flight path modeled is inaccurate and, as a result, the noise analysis omits any cumulative impact analysis over residents in the City of Riverside. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. As detailed in EIR Table 3.11-2, the EIR provides existing noise measurements for four locations in surrounding residential areas. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, more distant residential neighborhoods in the City of Riverside are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14.078), F-15E (1,216), KC-135R (5,810), MO-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations."93 As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near other residential neighborhoods.

The comment also cites the "known significant and unavoidable impacts from the proposed West Campus Upper Plateau Project" and indicates that this omission is piecemealing and a violation of CEQA requirements for cumulative impact analysis. CEQA requires the environmental analysis "examine the impacts of contemplated development...that are reasonably foreseeable consequences of the approval. ... Related activities that are similar in nature and that serve the same purpose are separate projects (as opposed to a single project) if they are independently considered for approval and one activity is not a foreseeable consequence of the other."94 The Proposed Project and West Campus Upper Plateau Project are independent and neither project is a foreseeable consequence of the other. The Proposed Project does not require the West Campus Upper Plateau Project to operate, and vice versa. The March Joint Powers Commission denied the West Campus Upper Plateau Project on May 12, 2025. Further, the significant and unavoidable noise impact for the West Campus Upper Plateau Project involves operational traffic noise increases along one non-noise-sensitive roadway segment, Cactus Avenue east of Meridian Parkway; this would not impact Riverside residential neighborhoods.95

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS%20Chapters%201-6.pdf.

⁹⁴ Kostka, S., and M. Zischke. 2008. Practice Under the California Environmental Quality Act (2nd ed.). California: Continuing Education of the Bar.

Urban Crossroads. 2024. West Campus Upper Plateau Revised Noise and Vibration Analysis. January 9, 2024. https://marchjpa.com/wp-content/uploads/2024/05/M-1.-Noise-Study.pdf.

- I-96.13 This comment indicates that the Proposed Project does not include the possibility that the Riverside County Sheriff's Department will move its helicopter operations to March ARB, despite an Exclusive Negotiation Agreement executed on August 23, 2023. The comment asserts that the EIR should analyze potential impacts associated with the Sherriff's Department's use of the March ARB and, further, that if the project is unlikely to occur, the EIR should "put conditional approvals in place to mitigate impacts if the Sherriff's helicopter facility moves forward." Inclusion of potential Sheriff aviation operations is speculative at this point as the Sheriff's Department is continuing to do due diligence and extended the exclusive negotiation agreement for another 2 years recently. 96
- I-96.14 This comment asserts that the Proposed Project "fails to include cumulative impacts from additional truck activity from newer warehouses built since May 2020 when the noise baseline measures were taken." As discussed in the Noise Impact Analysis (Appendix L-1 of the EIR), the average daily traffic volumes used in the analysis (see Table 6-2 of Appendix L-1) for 12 separate scenarios, including Opening Year Cumulative (2026) and Horizon Year (2045), were based on the Project Traffic Analysis (Appendix M-1 of the EIR). As discussed in the Traffic Analysis, for Opening Year (2026), to account for background traffic growth, traffic associated with other known cumulative development projects in conjunction with an ambient growth from Existing (2020) conditions of 12.62% is included for Opening Year Cumulative (2026) traffic conditions (2.0% per year compounded annually over 6 years). This comprehensive list was compiled from information provided by March JPA and is consistent with other recent studies in the study area. Relevant projects from other nearby agencies (including Moreno Valley and Perris) were also included. Traffic projections for Horizon Year (2045) with Project conditions were derived from the latest Riverside Transportation Analysis Model (RIVCOM). The EIR's analysis accounted for background growth and cumulative projects.
- It is comment reiterates that the noise analysis relies on pandemic shutdown period noise baseline as "typical conditions." Please refer to Response I-96.11, above. The comment further reiterates that the noise analysis did not include an accurate flight path and, as a result, did not analyze cumulative impacts along that flight path or the cumulative impacts of other known and potential future projects that would increase noise "along the entirety of the perimeter of the airfield and along the flight path." Please refer to Responses I-96.12 and I-96.13, above.
- I-96.16 This comment asserts that the Proposed Project "ignores" the March JPA General Plan Environmental Justice Element. Table 3.10-1 of the EIR discusses the Proposed Project's consistency with eight separate policies of the Environmental Justice Element. The Environmental Justice Element was modeled after the County of Riverside's environmental justice policies, The comment reiterates general opposition to the Proposed Project. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

March JPA. 2024. "Notice of a TAC Meeting." October 31, 2024. https://marchjpa.com/wp-content/uploads/2024/10/11-04-2024-TAC-Packet.pdf.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Comment Letter I-97

1-97.3

1-97.4

1-97.5

1-97.6

Poor decision

Elaine Miller <dsol4et@gmail.com>

Sat 7/20/2024 8:04 AM

To:Jeffrey Smith <smith@marchjpa.com> Cc:Catherine Barrett-Fischer <cbfcentury@aol.com>

I had high hopes that the JPL would make reasonable decision not to have air planes fly over our homes. With California reducing their carbon footprint print doesn't it make sense that JPL should be reasonable I 1-97.2 and do the same. More and more people are moving to Riverside county to get away from noise, crime and to work from home. It is almost impossible to work from home if you are kept awake at night, not to mention the air plane noise during the day while you are on the phone. Why would you want to add noise to the problem. These jobs are important. Do you want to drive people out of the county and reduce our tax incomes add to the carbon footprint by allowing one company to disrupt everyone's lives. Please respect our community and don't allow this to happen.

Thank you,

Elaine Miller

Response to Comment Letter I-97

Elaine Miller July 20, 2024

I-97.1 This comment is Form Letter B. As such, please see Form Letter B Response.

Comment Letter I-98

Please do not allow the Meridian D1 Gateway Aviation Center Project (SCH 2021040012) to hurt our children and the environment

Michelle Calanchini <michelle.calanchini@gmail.com>

Sat 7/20/2024 9:47 AM

To:district5@rivco.org <district5@rivco.org>;district1@rivco.org <district1@rivco.org>;Conder, Chuck <cconder@riversideca.gov>;jperry@riversideca.gov <jperry@riversideca.gov>;rrogers@cityofperris.org <rrogers@cityofperris.org>;mayor@moval.org <mayor@moval.org>;Dan Fairbanks <fairbanks@marchjpa.com>;Jeffrey Smith <smith@marchjpa.com>;2mayor@riversideca.gov <2mayor@riversideca.gov>;SMill@riversideca.gov <SMill@riversideca.gov> Cc:pfalcone@riversideca.gov <ClCervantes@riversideca.gov <ClCervantes@riversideca.gov> To our policy makers in the Riverside area,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to our community.

Please Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it difficult for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations

have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008.

This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects.

Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Michelle Calanchini

1-98.1

Response to Comment Letter I-98

Michelle Calanchini July 20, 2024

I-98.1 This comment is Form Letter B. As such, please see Form Letter B Response.

Comment Letter I-99

March JPA Meridian D-1 Gateway Aviation Center Project Draft EIR Comments

Catherine Barrett-Fischer <cbfcentury@aol.com>

Sun 7/21/2024 8:46 PM

To:Jeffrey Smith <smith@marchjpa.com>

1 attachments (16 KB)

Meridian-D1-Gateway-Aviation-Center-Project_draft_EIR_comments_2024721 Catherine.docx;

Dear Mr. Smith,

Attached please find my comments on the Meridian D1Gateway Aviation Project Draft EIR. | 1-99.1

Best regards,

Catherine Barrett-Fischer

To: Mr. Smith, March JPA, Smith@marchjpa.com

From: Catherine Barrett-Fischer, CBFCentury@aol.com

July 21, 2024

Meridian-D1-Gateway Aviation Center Project Draft EIR comments:

1.	Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.	
2.	The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations by DHL.	1-99.2
3.	The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.	
4.	March JPA and associated developers have a documented history of misleading claims about the impact of	
	commercial cargo operations on communities surrounding the Air Force Base. For example, note the fraudulent flight path map that was used at public meetings to initially approve DHL operations at March in 2004, a.k.a. "fake flight path" map.	1-99.3
5.	Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM) during flight.	1-99.4
6.	Cargo plane noise can adversely affect the academic performance of our children.	1
7.	The Draft EIR does not adequately consider the impact of more truck and vehicle traffic in our neighborhoods, including:	1-99.5
	a) Road deterioration: presently driving on the I-215 freeway near March ARB is like driving on the surface of the moon as the road is in such disrepair due to all the existing truck traffic.	
	 Additional truck traffic on I-215 on the Box Springs grade as well as major arterial routes which intersect I- 215 and other major freeways. 	I-99.6
8.	The project has not gone before the Riverside County Airport Land Use Commission (ALUC); the project is too close to the Clear Zone/Crash Zone identified in the Air Installation Compatible Use Zone Study (AICUZ). Aviation is inherently dangerous and the danger of plane crashes has not been considered in the Draft EIR.	1-99.7
9.	Native ecosystems and wildlife are at risk of becoming endangered if they have not already. This affects us in more ways than one because if there is an imbalance in the ecosystem, it brings larger issues such as water	
10.	loss because of lack of biodiversity and reduces the numbers of local pollinators meaning NO FOOD for us. The burrowing owls can be a danger to the military aircraft and disturbing their home and habitat endangers the existence of the burrowing owls. The burrowing owl is a California species of special concern. Displaced owls can become victims of bird strikes as they hit a plane or are sucked into an engine while hunting for food.	1-99.8
11.	March Air Reserve Base is scheduled to become the home of twelve KC-46A aerial refueling planes which is scheduled to arrive 2027-2028. Complaints from residents about the noise and pollution from Meridian D1	I-99.9
	Gateway Aviation Center cargo planes can endanger the existence of MARB. The KC-46As have armored cockpits to defend against threats. Our homes have nothing to protect our families and children from cargo plane noise and pollution.	I-99.10

Page 2 of 3 in Comment Letter I-99

12. The distinctive bowl-shape of Inland Empire geography captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

I-99.11

- 13. This commercial airport expansion is economically unwise, given the negative short-term and long-term trends on logistics business in the eastern Inland Empire:
 - a) There was a negative absorption of 2.9 million sq. feet industrial warehouse demand in Q1 2024, second negative quarter in last 4 quarters https://www.avisonyoung.us/documents/d/inland-empire/inland-empire-industrial-report-q1-2024
 - b) There was also negative absorption of 1.6 million sq. feet in Q2 2024 (for IE East, which includes Riverside and surrounding communities) https://mktgdocs.cbre.com/2299/b24aa8d0-0736-42f0-b2a6-a46ea0ef4499-103472408/v032024/inland-empire-industrial-figures-q2-2024.pdf

I-99.12

- c) By completely consuming the remaining open land with warehouse and logistics operations, this prevents future growth in higher-use activities such as light manufacturing, research and technology, medical, professional service, and similar types of business development. This trend locks much of the IE into an "employment ghetto" where a majority of the higher-skilled workers must leave the region every morning for work far away from home.
- d) All and warehouse automation (robotics) are quickly replacing warehouse and transport workers, so that negative job growth trends will continue, even when overall economy recovers.
- 14. By displacing rural food-producing operations (citrus and fruit groves, dairies, ranches, etc.) we are placing our population at risk of food shortages; also our food will then have many more "food miles" which adversely impacts the environment and places greater risk of our food supply. Increased commercial cargo operations at March have let to greater warehouse density and rezoning in the rural/agricultural communities of Mead Valley, Perris, Nuevo, Romoland, and Homeland. Many of these rural businesses and homes are now threatened by logistics industry developments.

1-99.13

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

1-99.14

Page 3 of 3 in Comment Letter I-99

Response to Comment Letter I-99

Catherine Barrett-Fischer July 21, 2024

- **I-99.1** This comment is a transmittal email. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-99.2 This comment is paragraphs two through five of Form Letter B. As such, please see Form Letter B Response.
- I-99.3 This comment alleges a fake flight path map was associated with DHL nighttime cargo operations. The Proposed Project is separate from the 2005–2008 DHL cargo flights. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-99.4 This comment is the sixth and eighth paragraphs of Form Letter B. As such, please see Form Letter B Response.
- I-99.5 This comment raises general concerns regarding the impact of the Proposed Project's truck traffic on road conditions. Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).97 In response to a request from the City of Moreno Valley (see Response A-6.11), PDF-TRA-1 has been revised to include a fair-share contribution for pavement maintenance for specified roadways over a 30-year cycle. Although project design features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the Mitigation Monitoring and Reporting Program (MMRP). MIPAA will monitor compliance through the MMRP. Please see Chapter IV, MMRP, of this Final EIR for the revised language of PDF-TRA-1. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Impacts to traffic are addressed in Section 3.12, Transportation, of the EIR.
- This comment raises traffic concerns specifically from increased truck traffic and clogged freeways. The Project Traffic Analysis (Appendix M-1 of the EIR) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-99.7 The comment raises concerns related to the Proposed Project's location relative to March ARB. Section 3.8, Hazards and Hazardous Materials, of the EIR states the project site is not located within the Accident Potential Zone, as delineated in the March ARB/Inland Port Airport ALUCP. Moreover, FAA issued Determinations of No Hazard letters for the proposed cargo building corners on

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DMV (Department of Motor Vehicles). 2020. "Where did your 2019 fees go?" Accessed April 2025. https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2019-fees-go/.

September 3, 2020. Because the FAA plan review did not identify any safety hazards that would interfere with aircraft operations, no impacts on potential safety hazards to people working within the vicinity of a public airport would occur.

Additionally, given the project site's proximity to an active runway, there is the potential that project features, such as drainage features and vegetation, could attract animals, particularly birds. Birds could pose a safety risk to aircraft in flight, resulting in a potentially significant impact. The Wildlife Hazard Review (Appendix J-3 of the EIR) evaluated the Proposed Project in relation to applicable wildlife hazard management guidance and policies and provided recommendations for the Proposed Project plans, including landscaping, outdoor eating areas, trash receptacles, and type and placement of trees and shrubs. MM-HAZ-3 (Wildlife Protective Measures) requires the incorporation of these recommendations into the Proposed Project. With implementation of these protective measures, impacts resulting from implementation of the Proposed Project would be less than significant with mitigation incorporated.

Regarding ALUC review, the Proposed Project would undergo ALUC review to demonstrate the proposed development is consistent with the ALUCP criteria prior to approval of the Proposed Project. Based on review of the March ARB/Inland Port Airport ALUCP, it is anticipated that the Proposed Project would be consistent and therefore would not result in a safety hazard.

The comment raises concern for plane crashes. Section 3.8 of the EIR adequately analyzed the Proposed Project's potential impacts related to safety hazards within an airport land use plan, as required by CEQA. Generally, the potential for plane crashes onto the project site is too speculative to predict in the environmental analysis. However, existing regulations and land use planning (i.e., ALUCPs) assist in providing parameters for such events. The project site is not located within the Accident Potential Zone of the March ARB/Inland Port Airport ALUCP. As such, required consistency with the ALUCP and subsequent ALUC review prior to project approval would provide regulatory compliance for safety risks within the vicinity of an airport. Moreover, the EIR's analysis demonstrates the Proposed Project would not exacerbate existing safety risk. For example, 14 CFR Part 77 regulates height criterion on a site-specific basis.

1-99.8 This comment raises general concerns regarding impacts to biological resources. Section 3.3, Biological Resources, of the EIR analyzes potential impacts from the Proposed Project to sensitive biological resources based on the criteria set forth in CEQA Guidelines Appendix G. As such, the impact analysis focuses on the plants, wildlife, and habitats that have been determined to be special-status or sensitive by the resources agencies or local policies, plans, and regulations. As detailed in Section 3.3 of the EIR, 664 acres of lands were placed into a conservation easement to offset species and habitat losses associated with the March Air Force Base Reuse Plan, which included redevelopment of the project site. As such, many habitat and species losses have already been addressed through conservation of these 664 acres of lands. MM-BIO-2 (Best Management Practices) requires biological monitoring; clearly marked work limits; restricting vehicle speed limits to 15 mph or slower to minimize the generation of fugitive dust; pet restrictions; measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and incorporation of native. non-invasive landscaping to minimize the spread of non-native invasive plant and animal species. MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures) requires nesting bird surveys of the Proposed Project impact areas. If active nests are found, the biologist must establish buffers and/or implement monitoring to avoid impacting nesting success.

I-99.9 This comment raises concerns for burrowing owl and their habitat related to future operations at March ARB. MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures) and MM-BIO-1B (Burrowing Owl Relocation and Mitigation Plan) will ensure that any burrowing owl present prior to construction activities are identified and avoided to the greatest extent feasible. If burrowing owl cannot be avoided, these measures include stipulations to ensure that impacts are minimized or burrowing owl are allowed to passively relocate in coordination with CDFW.

This comment raises concern for burrowing owl bird strikes related to future operations of March ARB. The Wildlife Hazard Review (Appendix J-3 of the EIR) evaluated the Proposed Project in relation to applicable wildlife hazard management guidance and policies and provided recommendations for the Proposed Project plans, including landscaping, outdoor eating areas, trash receptacles, and type and placement of trees and shrubs. In addition to MM-BIO-1A and MM-BIO-1B, MM-HAZ-3 requires the incorporation of these recommendations into the Proposed Project. With implementation of these protective measures, impacts resulting from implementation of the Proposed Project would be less than significant with mitigation incorporated. The measures to protect burrowing owl during construction would ensure avoidance of future bird strikes due to burrowing owl having been excluded from the area.

- I-99.10 This comment raises concern regarding noise and pollution related to future operations at March ARB. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. This comment is not related to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-99.11** This comment is the ninth paragraph of Form Letter B. As such, please see Form Letter B Response.
- **I-99.12** This comment states concern for economic trends in the region. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-99.13 This comment discusses displacement of rural food-producing operations. The Proposed Project does not displace any food-producing operation. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-99.14 This comment is the last paragraph of Form Letter B. As such, please see Form Letter B Response.

Comment Letter I-100

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Clinton Clark <clintonc27bel@gmail.com>

Sun 7/21/2024 9:09 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-100.1

- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

There we go again. One project failed and another pops up. Why are you folks trying to make this area worse instead of making it better.

I am totally annoyed with March JPA instead of you all focus of developing this area you all are focusing on how to destroy this area know as Orange Crest.

I am not just writing to let you know that I oppose this current project. But if you cannot improve the area please consider leaving it alone. We don't want airplanes flying over our area and disrupt our way of living.

1-100.2

Thank you.

Sincerely, Clinton Clark 92508

Sent from my iPhone

Response to Comment Letter I-100

Clinton Clark July 21, 2024

- **I-100.1** This comment is Form Letter A. As such, please see Form Letter A Response.
- I-100.2 This comment raises general opposition to the Proposed Project and concerns regarding air traffic out of March ARB. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Clinton Clark <clintonc27bel@gmail.com>

Sun 7/21/2024 11:32 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-101.1

- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely.

<name>

<zip code>

Sent from my iPhone

fmsladek@gmail.com

Clinton Clark July 21, 2024

I-101.1 This comment is Form Letter A. As such, please see Form Letter A Response.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Cindy Jessen <cjessen022@gmail.com>

Sun 7/21/2024 9:45 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Cynthia Jessen 92508 1-102.1

Cynthia Jessen July 21, 2024

I-102.1 This comment is Form Letter A. As such, please see Form Letter A Response.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Deb Whitney <surfjade@yahoo.com>

Sun 7/21/2024 8:00 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

1-103.1

Thank you. Sincerely,

Deb Whitney 6790 Mission Grove Pkwy N II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Deb Whitney July 21, 2024

I-103.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Eunhee Kim <eunster@yahoo.com>

Sun 7/21/2024 9:07 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-104.1

- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Eunhee Kim, R-NOW Member Raleigh, NC 27615

Eunhee Kim July 21, 2024

I-104.1 This comment is Form Letter A. As such, please see Form Letter A Response.

STOP WAREHOUSING PROJECTS IN MEAD VALLEY

Eddie Salazar <salazar.eddie@live.com>

Sun 7/21/2024 4:38 PM

To:Jeffrey Smith <smith@marchjpa.com>

Hello there, my name is Eddie Salazar. I have been living in Mead Valley ever since my son was born in 2018. It's been a great area for him to grow up without the hustle and bustle of the city life, which is literally everywhere else. The history and culture Mead Valley holds is Ranchero style, allowing its residents to ride their horses and tend to their livestock on their property and coming home to a quiet neighborhood. As the years have passed and now my son is six years of age, many changes have happened in his environment not making it suitable for a young growing boy to grow up in. Multiple warehouses have been built, at least two a year so it seems, maybe more. Out of all the warehouses built I've only seen a handful of them that are actually being used and that have been there for a couple years. These pop-up warehouses are taking acres of space that could be used to improve Mead Valley instead of hindering it with these warehouses. Not only do these warehouses hold no value to its residents, it takes away the beauty and individuality of this special place. Please take this into consideration and limit these pop-up warehouses that devalue the properties that have been here far longer and deserves respect. Also giving my son, a safe environment to grow up in, like many others who continue to live here.

I-105.2 I-105.3 I-105.4 I-105.5 I-105.6 I-105.7

I-105.1

Get Outlook for Android

Eddie Salazar July 21, 2024

- **I-105.1** This is a general introductory comment. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **I-105.2** This comment provides general opposition to the changes in the commenter's neighborhood, including increased warehouse uses. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **I-105.3** This comment is in opposition to existing warehouses within Mead Valley. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **I-105.4** This comment is in opposition to existing warehouses within Mead Valley. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-105.5 This comment is in opposition to existing warehouses within Mead Valley. The Proposed Project does not include a warehouse. The Proposed Project includes a cargo building, which would serve as a pass-through location for air freight cargo; therefore, there would be no storage, including cold storage. This comment provides general opposition to the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-105.6 This comment is in opposition to future warehouse projects. The Proposed Project does not include a warehouse. The Proposed Project includes a cargo building which would serve as a pass-through location for air freight cargo; therefore, there would be no storage, including cold storage. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **I-105.7** This is a general closing comment stating the commenter's general opposition to the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Franco <inlandvalleyalliance@gmail.com>

Sun 7/21/2024 3:46 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith.

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Residents have shown up to oppose other industrial projects that will have an obvious effect on our quality of life. Residents will show up to oppose this one as well.
- 6) This will significantly worsen our air quality in the region. Leading to contribute to the many issues and harmful effects we have with the oversaturation of industrial warehouses in the area.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Franco Pacheco Inland Valley Alliance I-106.1

Franco Pacheco July 21, 2024

I-106.1 This comment is Form Letter A. As such please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Fernando sosa jr. <sosa1977@gmail.com>

Sun 7/21/2024 8:43 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

I-107.1

- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Fernando Sosa Jr. 92508

Fernando Sosa Jr. July 21, 2024

I-107.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

SHARI BARNES <sbarnes656@aol.com>

Sun 7/21/2024 7:21 AM
To:Jeffrey Smith <smith@marchjpa.com>
Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Please consider our neighborhoods.

Thank you.

Sincerely, Gary Barnes 92508 1-108.1

Gary Barnes July 21, 2024

I-108.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comments March Cargo Planes EIR

mnkhudson92 < mnkhudson92@gmail.com>

Sun 7/21/2024 3:02 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to us and the surrounding communities.

Please consider for the record:

Aircraft noise has several negative effects on human health when sleep is disrupted. Scientific studies have proven and personal experience living here during DHL operations. The Draft EIR does not adequatly consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and other neighborhoods located in Moreno Valley and Perris. For the record our neighborhood was severely impacted by the 2005-2008 March cargo operations by DHL during late night/early morning operations.

March JPA/Consultants and associated developers have a documented history of misleading claims about the impact DHL night time cargo operations had on communities surrounding the Air Reserve Base.

Please consider implementing and adopting "The Good Neighbor Policy" for all proposed Commercial and Aviation flights (arrival and departure). "No flights from 10:00pm to 7:00am".

Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight. The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the exponential increase in warehouses/businesses within our area, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase during the night time hours.

The Air Quality Index (AQI) within our community is good to moderate during the day and at night time our AQI is unhealthy to very unhealthy. Please consider adopting "The Good Neighbor Policy", to help keep our AQI from rising during night time.

We suffered from noise during the night time DHL cargo flights of 2005-2008. For years we submitted airplane noise complaints to Gary

I-109.1

I-109.2

1 100 2

I-109.4

I-109.5

L 109 7

during DHL operations at night. Should you choose to move forward with this project, we request MARCH JPA replace our home windows with triple pane windows and install installation to reduce airplane noise in our home.

It's hard to determine the direct noise impacts arrival and departure flights will have on our home, please explain for 20107 Aptos Street. Please consider less environmentally-harmful, community-focused alternative "The Good Neighbor Policy". Thank you for your time and response.

I-109.7 Cont. I-109.8 I-109.9

Sincerely, Mike and Kerrie Hudson 20107 Aptos Street Riverside, ca 92508

Page 2 of 2 in Comment Letter I-109

Mike and Kerrie Hudson July 21, 2024

- **I-109.1** This comment is paragraphs one through three of Form Letter B. As such, please see Form Letter B Response.
- I-109.2 This comment is paragraph five of Form Letter B. As such, please see Form Letter B Response.
- I-109.3 This comment requests a "Good Neighbor Policy" eliminating night flights. In consideration of public input, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details.
- **I-109.4** This comment is paragraph six of Form Letter B. As such, please see Form Letter B Response.
- I-109.5 This comment is paragraph nine of Form Letter B. As such, please see Form Letter B Response.
- I-109.6 This comment requests that nighttime flights be eliminated to help reduce negative effects on air quality. In consideration of public input, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III of this Final EIR for details.
- I-109.7 This comment repeats noise-related complaints related to the DHL nighttime flight operations. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.98 As of 2024, there were fewer than 20 DC-9s still in service.99 Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.100 The Proposed Project is separate from the 2005–2008 DHL cargo flights.

The comment also requests that if the Proposed Project moves forward as planned, March JPA provide triple-paned windows and insulation for their home to reduce nighttime airplane noise. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the commenter's residential neighborhood, Orangecrest, is outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the

 $^{^{98} \}quad \text{https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation} \\$

⁹⁹ https://simpleflying.com/dc-9-operators-2024/

https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." ¹⁰¹ As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhood of Orangecrest and no mitigation is required.

In consideration of public input, the project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-109.8 The comment requests data specifically for noise impacts on their home address. As discussed in Response I-109.7, above, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhood of Orangecrest and no mitigation is required. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- In the comment requests an alternative with less environmental impacts. The project applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

Comment Letter I-110

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Gayle Dicarlantonio <gayledmail@gmail.com>

Sun 7/21/2024 7:10 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, G DiCarlantonio 92507 1-110.1

Response to Comment Letter I-110

Gayle DiCarlantonio July 21, 2024

I-110.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-111

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

jenniferadiaz < jenniferadiaz@yahoo.com>

Sun 7/21/2024 9:51 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

The recent air and ground traffic have impacted my quality of life. I have lived in Orangecrest for 22 years. I had to seek mental health care due to the intense increase of disruptive noise. Please, please do the right thing.

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, <name> <zip code>

Sent from my T-Mobile 5G Device

1-111.1

Response to Comment Letter I-111

Jennifer A. Diaz July 21, 2024

I-111.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-112

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Greg Morris < greg.morris49@yahoo.com>

Sun 7/21/2024 11:01 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith, my name is Greg Morris. Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally harmful, community-focused alternatives. Imagine you lived here and what that noise pollution might do to you and your family and friends.

1-112.1

Thank you. Sincerely, Greg Morris

Response to Comment Letter I-112

Greg Morris July 21, 2024

I-112.1 This comment is Form Letter A with the addition of "Imagine you lived here and what that noise pollution might do to you and your family and friends." This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.

Comment Letter I-113

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Joe Aklufi <jaklufi@gmail.com> Sun 7/21/2024 6:28 AM To:Jeffrey Smith <smith@marchjpa.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Joseph Aklufi Riverside 92506 I-113.1

Response to Comment Letter I-113

Joseph Aklufi July 21, 2024

I-113.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-114

RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

john farnsworth < johnrfarnsworth@att.net>

Sun 7/21/2024 1:34 PM

To:Jeffrey Smith <smith@marchjpa.com>:john farnsworth <johnrfarnsworth@att.net>

1 attachments (178 KB)

Cargo Planes DEIRComments PDF.pdf;

Dear Mr. Smith:

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

I have attached an EXCEL worksheet with comments/questions associated with this DEIR.

John Farnsworth 7242 Westport St. Riverside, CA 92506 1-114.1

Location		
DEIR	COMMENTS/QUESTIONS/REQUEST FOR INFORMATION	
	EIRs are required to provide an unbiased analysis of the project as proposed by the applicant and identified alternatives to the project, as required by CEQA. This DEIR does not come close to be unbiased. Who paid for thus DEIR? Starting with the objectives, obviously written to fulfill financial benefits for the project to the Developer, all analysis results should be determined in an unbiased manner to better explain to the public/approvers the true	l-114.1 Cont.
-	nature of the favoritism towards the developer. Why was this DEIR written/released when the DEIR from the onset supports the desires of the developer without regard from the public interests and quality of life perspectives?	I-114.2
	DEIR created only three, not truly alternatives, for consideration. Why were alternatives that might utilize excessive capacity at other nearby airports not considered? No data was provided that fully supported the "need" for increased cargo operations for the region; why not? Another alternative could be	I-114.3-4 I-114.5
	building a truck only terminal for distribution needs and avoid aircraft operations that will further create noise, pollution from aircraft, flight path noise and population disturbances (including more than described 10% affected by sleep disturbance) resulting from up to 22 flights per day, with more than	I-114.6
-	1,200+ truck trips per day; why not add another alternative for consideration? These are but two; how many other alternatives were/could be generated for consideration if the objectives were rewritten in such a way NOT to favor the developer?	I-114.7
	What Avigation easements currently exist for March ARB, March JPA, developer and other appropriate entities? Will additional avigation easements be required resulting from this project (especially in the flight paths for commercial plans using March ARB in the Mission Grove, Orange Crest, Woodcrest and Sycamore Canyon residential housing areas)? My original house deed makes no reference to Avigation rights - so what needs to happen for proper compliance with the air space associated with existing commercial and future commercial cargo plane flight paths over these neighborhoods?	I-114.8
ES-1	"prepared by MJPA" was the DEIR prepared by consultant DUDEK? "FAA has primary responsibility"what FAA agency, points of contact, phone numbers etc. are included in this statement? By who and when will the	I-114.9 I-114.10
ES-3	Environmental Assessment report be available for public review? Who rejected and when were identified alternatives provided for public review?	I-114.11
ES-4	What "passenger" air services have been implemented to support the redevelopment plan Last paragraph Page ES-3that does this mean? Where in the DEIR is this referenced and if only a reference, how does it apply? Why is it necessary to allow 5% late night operations? Why not zero or 1%.	I-114.12
E3-4	Average 17 two way operationshow will this be enforced legally with the cargo plane tenants? Also, we've been told that the eventual operator has not yet been selected to bids asked for; how then, can this DEIR be issued with incomplete information for evaluation? Thinking back about the DHL law suitshow will the owner control the contract/negotiation/operation processes to prevent such occurrences again? Job opportunitieswhat kind (track drivers, fork lift operators and the like? How many college level or technical type jobs will be created? How was "\$281.498 calculated? What about likely wear and tear of all local roads, freeways (215 and 91/60)? Who determines how this money will be spent? What about homeowner unknown and unwanted road hazards, pot holes, and congestion H will homeowners be compensated for their lower evaluation/value when selling?	I-114.14 I-114.15 I-114.16 I-114.17 I-114.18

RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

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ES-5	No zoning designationwhat about the non-MJPA land?	I I-114.20
	identified as being insignificant and unavoidablethis is disastrous, especially for residents living nearby and in the flight path of cargo planes. Why	T _{I-114.21}
ES-6	should the Government, or any government entity allow such a project knowing the mitigation measures will not solve the identified problems?	+ 1444.00
FC 0	not summarized in table ES-1why are the results not included in the summary?	1-114.22
ES-9	What is definition of "potentially"? Why is this not "significant"?	I-114.23
ES-11	Truck requirementshow will this be enforced? What are the consequences if not adhered to. What is a "smart way truck"?	I-114.24
ES-12	"Tenant shall be encouraged" why not make this a contractual requirement?	1-114.25
FC 40	What triggers the use of back-up generators?	I-114.26
ES-13	AQ-4: substantial number of peopleWhat is the area/population density associated with less than significant	+ I-114.27 I-114.28
	What is the MMRP? How will compliance be enforced?	+ 1-114.28
	Unavoidablewhy should such a project be considered when there will be a significant mitigation plan/process be required? Why should be project be	1-114.29
12/2/2013	allowed to proceed knowing in advance unavoidable consequences will result?	+ 1444.00
ES-20	How will co=benefits apply for MM-AQ-5	I-114.30
ES-22	EV charging stationsdoes this include complete access for consumer/public use?	I-114.31
	Will cargo be restricted also from transporting hazardous material?	I-114.32
ES-23	HAZ-4: There is no discussion of "people residing" in the project area for excessive noise- why not?	I-114.33
ES-24	Where is the study (and who prepared) NOI-1 to confirm whether or not noise levels (including flight paths) for the vicinity of the project?	I-114.34
ES-25	MM-NOI-2: How does "identified and disclosed" in the DEIR satisfy noise level requirements? Where is this information included in the DEIR?	
	See MM-NOI-1 and MM-NOI-2how does this apply as it relates to cumulative noise levels? Why should this project be allowed to proceed knowing that significant and unavoidable results from the project will occur right from the beginning?	I-114.35
	MM-TRA-1 addresses construction - why not afterwards?for the following measures: describe "how" will all of the bullets identified therein be monitored/legally require the bullet points.	I-114.36
ES-27	3.14: Where is the data (and who prepared) the data that supports less than significant/no impact results?	1
	Heacock street improvements identified elsewhere. Why do these improvements/upgrades not result in significant level?	I-114.37
ES-30	Alternate 3: Why is 10% chosen for the reduced number of flights? Why not 25% or even 50%?	I I-114.38
	Table ES-2: Why is public number of flights not identified/compared in this table? All of these alternatives require mitigation. Why are alternatives not	I 1-114.39
ES-31	identified that could result in impacts that do not require mitigation?	I-114.40
	project objectives (for alternatives 1-4): why can't the project objectives be rewritten to a more generic, not biased set of objectives (in favor of the	1
ES-22	developer) that would open up other, more residential friendly alternatives.	I-114.41
	How will local (say within 10 miles) be impacted by this project (both in increased traffic, truck traffic, and road repairs required over time due to heavier than normal usage)?	I-114.42
1-3	What is the definition of feasible (used here and throughout the DEIR)?	T I-114.43
1-4	Where in the DEIR can "statement of overriding consideration" be found? Who prepared?	I I-114 44

RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

Page 3 of 11 in Comment Letter I-114

2-3	What is the definition of "regional demands for air cargo services"? Where is the data to support objective statement "alleviating congestion and overtaxed air facilities"?	T I-114.45
2 3	What kind of jobs will be resulting from this project? Will any of these jobs be high tech and/or require more than a high school education or technical	† _{I-114 46}
	training? What is the ratio of new jobs projected for the Cities of Riverside, Moreno Valley and Perris? If people travel more than from local residential,	1-114.47
	that is from longer distance away, will that require VMT analysis be revised?	† I-114.48
	What about road improvements (reduced road life), for both local (city) traffic and freeways? Where in the DEIR is there a	1-114.49-50
	discussion/analysis/recommendation to better understand how the local freeways (215, 60 and 91 for example) be increased? These freeways already	T
	are over used/congested due in large part the approval of newly constructed warehouses/distribution centers and the like without properly	
	understanding how much the traffic obstruction has / will increased; where in the DEIR is this concern by the public being given the proper attention and	I-114.51
2-4	mitigation measures (night time truck traffic for example) be studied?	
2-5	Fencing: will the fencing be constructed to reduce noise levels (i.e. block wall vs wood)?	† I-114.52
	Window glazing: will dual pane windows be required in the design?	T I-114.53
2-6	What is the definition of non-peak?	TI-114.54
2-7	What is the definition of "no storage"?	T I-114.55
2-9	How was fair share \$281,498 calculated?	I I-114.56
2-10	"separate environmental document": provide a copy for public review in association with this DEIR for review/comments.	I I-114.57
	Where are "feasible mitigation measures" identified in the DEIR?	I I-114.58
	Riverside County Airport Land Use Commission: "consistency finding"what does this mean? What permits are required? Table 2-4 city of Moreno Valley	I -114.59-60
2-11	addresses construction traffic; why is during operation also not included?	I-114.61
	Many in the public sector disagree with the overall summary that the DEIR is deemed insignificant. How do the public comments receiver greater impact,	1444.00
	rather than wait until the next version is issued with comments? How can the public review ALL comments prior to the release of the next version of the	I-114.62
3-1	DEIR?	+
3-2	Provide definition/usage parameters of 14 CCR 15130(a)(3) and CCR 15130(b)(5).	I-114.63
	Cumulative projects table and narrative do NOT include nearby projects - K-Mart Apartments (60 feet tall buildings) or the Plateau Warehouses (also a	The second
	Project of the developer); why not include these nearby projects in the EIR stage? There are also warehouse projects being considered south of the	I-114.64
3-3	airport in Mead Valley should be considered; why not?	
	Table ES-2: Why is public number of flights not identified/compared in this table? All of these alternatives require mitigation. Why are alternatives not	† _{I-114.65}
	identified that could result in impacts that do not require mitigation?	1-114.66
3-4	Table 3-1 identifies many projects by Project number only. Can the table be corrected to include the descriptions like elsewhere in the table?	İ I-114.67

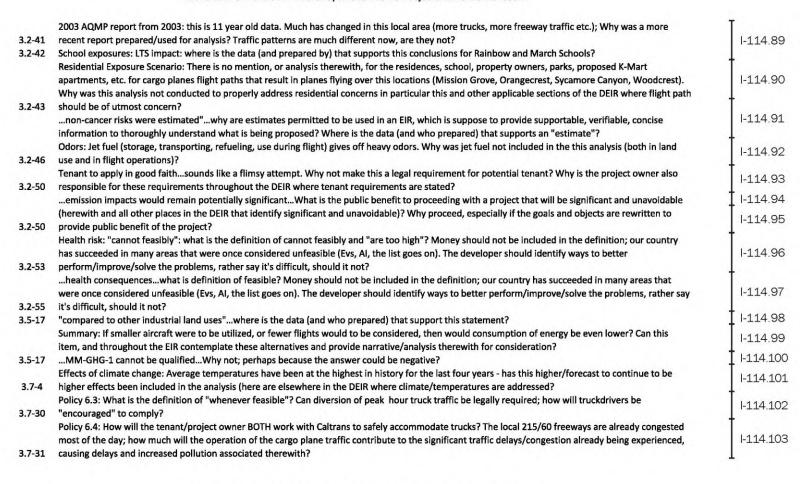
RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

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		T
	FAA Form 7460-1 requires submittal for alteration of airport. Can this form be revised, for example, to alter the flight path of commercial planes take	I I-114.68
	off/landings from south to north, to north to south for example. Changing the flight path as such results in cargo planes flying over areas that have many	1-114.69
	fewer residential houses and therefore less noise impacts, sleep disturbance, pollution etc., would be better for the entire community, would it not?	1
	What prevents applying for a revision to Form 7460-1 to change the flight paths for cargo planes? Would changing the flight path also reduce airplane	I I-114.70
	take off noise since planes can rise to flight pattern height mores slowly without the San Bernadino Mountains in the way? I have seen occasionally that	T _{I-114.71}
3.1-2	flight paths have been altered when wind directions dictate take off in the other direction, so it is possible, right?	1 1-114.71
3.1-7	What is the definition of "viewshed" and why is this not more pertinent to residential land uses?	I I-114.72
3.2-1	Can the reports identified in the DEIR be provided in paper form and electronic form?	I I-114.73
3.2-7	Which agencies and what is the regulation to show compliance with "directs state and local agencies to make investments that benefit"?	I I-114.74
3.2-16	Rules 402 and 2305: how are these rules being addressed to show compliance?	I I-114.75
3.2-17	Policies 6.1 and 6.3: how are these rules being addressed to show compliance?	I I-114.76
	Environmental Justice Element, while issued, remains under scrutiny and its' applicability uncertain by the public in particular; why was this not disclosed in this DEIR?	I-114.77
3.2-17	Policies HC 16.5 and HC 16.18: how are these rules being addressed to show compliance (near housing, job poor areas creation and reduction in VMT, etc.)?	I-114.78
3.2-23	Consistency 1 and 2: how were these calculated (and by who) to result in "will not result" and "will not exceed" statements?	I I-114.79
5.2 25	Off-site assumptions: discussion describes project to begin in June 2023 and so forththis project did NOT start and was not finished as described? Why	T
	is this narrative allowed to be included when in fact it is stating that the analysis is still applicable, when it obviously is not? Can the modeling be reanalyzed to reflect todays situations (i.e. new modeling)?	I-114.80
3.2-26	Aircraft related emissions are not concentrated enough: where is the data (and who prepared) to say "are not considered" and why?	† I-114.81
3.2-29	Consistency 1 and 2: how were these calculated (and by who) to result in "will not result" and "will not exceed" statements?	1-114.82
	Operational Impactsare anticipated to exceed: why should this project even be considered knowing emissions are not in accordance with regulations?	1
	Refer to earlier questions about altering the goals and objectives elsewhere in this input (provide answer for this question also).	I-114.83
	"there are no feasible mitigation measures": who decides there are no feasible measures? Could feasible measure include flying smaller planes, fewer	1-114.84
3.2-30	planes, changing the flight path, hours of operation etc.?	1-114.84
	"Considered to have the potential to conflict with Consistency Criterion 1": what are the conflicts? Why are they not addressed/considered?	T
	"AQMP consistency would therefore be significant and unavoidable": What are these conflicts? Why should this project be allowed to proceed knowing	
	that there would be significant and unavoidable consequences in approving this project? Here and multiple other sections of the DEIR apply also;	I-114.85
3.2-31	therefore please provide a complete response.	
3.2-36	Peak season: how can any increase not be more harmful than non-peak season (10 months of the year)?	† I-114.86
	Sensitive receptors includes residences: how was it determined that residences will not be impacted to substantial pollutant concentrations? Where is	1
3.2-37	the date (and prepared by whom) to support this conclusion?	I-114.87
	Table 3.2-14: How is it possible that peak season maximum daily emissions be lower for CO, PM and PM2.5, than non-peak season? More trucks, more	†
3.2-39	flights obviously increases emission emitted. NOX for non-peak season is lower, so why are the other emissions for peak season not higher?	I-114.88

RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

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RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

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		-
	Policy 73: What is the definition of "passive solar"? Is it possible for the project to install solar panels that create excess electricity that can be sent back o the grid and why not?	I-114.104
3.7-33	14.2 mile trip for medium heavy duty truckshow will this be enforced - that is using the mile-trip averages stated. How can tenant owner monitor/guarantee compliance with the SCAQMD requirement?	l-114.105
3.7-35	VMT per employeehow was this calculated and by who? Where is the data?	1-114.106
3.7-45	"favorable jobs/housing balance"what is the definition? Where is the data to support this statement?	1-114.107
	"Enhance the preservationresilience of regional transpiration". Does this Include local and nearby freeway systems that are already over burdened where other warehouse developments have been built without consideration for improving the flow of traffic on these freeways?	I-114.108
	"improving goods movement"what is the definition for this? What study (and by who) prepared the analysis for this statement?	1-114.109
	"reduce commutes to large urban centers". Elsewhere (3.7-33) the information supplied describes the nominal VMT using local warehouses. Why then,	T
	and what does it matter, for reducing VMT from Los Angeles and Orange County locations when the traffic is expected to arrive/depart from local distribution centers as defined in 3.7-33?	I-114.110
	"reducing traffic congestion"how would the project accomplish these goals (what about more professional and tech jobs); who prepared the analysis (and provide a copy for public review)?	-114.111
3.7-46	"would not impact natural habitat". Should cargo flight path operations be considered to properly support the statements herein?	I -114.112
	"no feasible mitigations" Where is the study (and by who) that supports this statement? Feasible infers something could be done, so why not properly consider all mitigations?	1-114.113
	"located approximately .5 mile to the east" Where exactly is this reference point and where is the .5 mile measured from (building site. Cargo loading	T 1-114.114
2-8.2	area, traffic light for entering the project).	
3.8-11	"toxic release inventory"where is this inventory? Can a copy be provided for public review?	I I-114.115
	"2018 March ARB AICUZ Study"this document is 6 years old and likely does not include the Amazon cargo planes currently operating; why not? Is there any reason this study cannot be updated to reflect current operations (military and commercial)? Do the noise contours include flight path data? If not, why not? Cargo planes flying over residential areas need to be studied also; will public concerns regarding cargo flight path noise, pollution, safety	I-114.116
3.8-13	concerns be included in an updated study?	+
3.8-18	"ALUCP is discussed in greater detail"Where in the DEIR is this located?	I-114.117
3.8-21	"March ARB released an update"where is this document in the DEIR? This document is 6 years old and likely does not include the Amazon cargo planes currently operating; why not? Is there any reason this study cannot be updated to reflect current operations (military and commercial)? Do the noise contours include flight path data? If not, why not? Cargo planes flying over residential areas need to be studied also; will public concerns regarding	I-114.118
3.8-21	cargo flight path noise, pollution, safety concerns be included in an updated study?"CNEL considered normally acceptable"Where is this study (and who prepared). What is the definition of normally acceptable? Could one persons definition of normally acceptable differ from another and how would that be resolved?	l-114.119
	Table 3.8-3: cells showing —are clearly unacceptable. Why should this project be allowed to proceed under these conditions?	+
3.8-25	Are transport of fuel, cargo plane refueling considered a type of operational creation of hazardous material that could release hazardous fuels?	I-114.120
3.8-26,27	When March JPA role is complete, who/how will requirements stated herein be administered/monitored/legal actions as necessary be handled?	1-114.121

RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

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3.8-28	Spills of any type, size and locations are dangerous and unhealthy; how and by who determined LTS impact associated with possible spills?	I-114.122
	HAZ-4: adjacent to the project are residential housing, school and pre-schools, people residing within the two mile zone of this public airport use, that	I-114.123
3.8-29	should be properly discussed herein. Another EIR has been released to build apartment building in the cargo plane flight path that will rise up to 60 feet; has this potential new land use been studied herewith (and elsewhere in the DEIR) to determine compliance?	I-114.124
	Does this section address take-off/landing/flight path level of noises? Especially concerned about flight path noise levels while plane are ascending over	Ī
	residential areas (Mission Grove, Orangecrest, Wood Crest and Sycamore canyon areas of Riverside), frequency of flights, and potential crash area	I-114.125
	location. These concerns were brought up by residents during a public hearing recently, however responses did not address flight path noise, pollutants,	1
3.8-31	fuel leaks, etc. Can this section (and elsewhere within the DEIR as applicable) be studied to provide information related to cargo flight path operations?	I-114.126
3.10-1	Environmental Justice Report: this document is in dispute to applicability, effectiveness and legal enforcement; why include as a reference?	T I-114.127
	FAA Form 7460-2: has this form been submitted to FAA as required? Is it possible using this form to amend he cargo airplane take off and landing	1,444400
3.10-3	direction (from south- to -north to north- to- south) to take off over lower residential properties already affected by cargo plane activities?	I-114.128
	Where is MARB instruction 13-204; if not in EIR, can it be provided?	1-114.129
	Where is CFR Part 150; if not in EIR, can it be provided?	T I-114.130
3.10-4	March ARB AICUZ study: was this approved by the Commission; if not why not?	1-114.131
	Was cargo pane take-off parameters included in this study; if not why?	I I-114.132
	"Hazards to flight (tall objects)": as mentioned elsewhere herein, there is a proposed apartment building complex in Mission Grove with three building	I-114.133
3.10-5	being proposed at 60 feet tallwas this new project included in the required airspace requirement pursuant to 14 CFR Part 77? If not, why?	1-114.133
	RTP/SCSI/Connect SOCAL identifies transportation planning: did these studies address the existing freeways/on and off ramp backup/delays already	I _{1-114.134}
	congested all day long? What about other roads in the vicinity in addition to Heacock?	1-114.134
3.10-6	CalENVIRONSCREEN: What/where is this, what does it truly intended to disclose, and who prepared the study?	I I-114.135
3.10-7	"Community Preferred": What/where is this, what does it truly intended to disclose, and who prepared the study?	I I-114.136
3.10-9	zoning designationWho has to approve this re-zone request and when in the process will be accomplished?	I I-114.137
	Policy 1.1: What is the definition of employment opportunities? Does this include professional and high tech jobs (something more when fork list drivers	I-114.138
3.10-11	and warehouse labor)?	1-114.156
	Policy 1.2: How does this policy address and the owner include in the DEIR concerns, impacts, lower home values affecting local residents?	I I-114.139
	Policy 1.3: Where are freeway and local road wear and tear concerns addressed here and through the DEIR?	I I-114.140
3.10-12	Policy 1.9: Was take-off/flight plans considered for the studies and inclusion herein for studying noise level contours and the impact to local residents?	I I-114.141
	Goal 2:use existing transportation infrastructureWhat about impacts to local freeways 215/60; what improvements are being proposed to reduce traffic congestion, noise and pollution?	I-114.142
	Policy 2.1:reduced hours of operation: this was not addressed herein; why not?	† I-114.143
3.10-13	If the project was not approved, what would be the impacts to the needs of the air cargo industry?	1-114.144
3.10-13	if the project was not approved, what would be the impacts to the needs of the air cargo industry?	1 -114.14

RESPONSE TO Meridian D-1 Gateway Aviation Center Project SCH No. 20210400012

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		T
	Policy 2.4: How are t he interests of "adjacent residents" being protected? As stated many times in this response, interests of residents in the flight path take-off patterns are totally ignored; why? There are many nearby residential homes, especially when the cargo plane flight paths are taken into consideration; this does not appear to be adequately addressed; why?	I-114.145
	Policy 3.1: How will this policy be implemented to offset public access roads and the nearby freeways 215/60?	1-114.146
W	Policy 3.2: "expansion of infrastructure"the analysis doe NOT address infrastructure; why? Just because new operations would not exceed permitted	T 1-114.147
3.10-14		1
	Policy 3.3: "fiscal support""cannot be guaranteed"Why not; how will the project provide support? Does infrastructure include local roads, freeway improvements, compensation to home owners in the take-off/flight path over housing impacts?	I-114.148
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compliance regulations? It is very likely that trucks/vehicles will travel to the project site from directions other than noted in the DEIR; how is this possibility addressed both by the project and the City, especially since the hours of operation are during prime morning and evening travel times. Policy 3.9, Goal 2: "minimize dependance" and "reduce emissions": How will this be accomplished? The only method identified is "new jobs" and 1.10-31 "reserved parking spaces", both passive in nature. What other mitigations can be enforced? What housing balance will be provided to reduce the VMT? Goal 3: "the proposed projectof this EIR": Where is the study (and who prepared and accepted) that supports this analysis? 3.10-32 Policy 5.5: Explain the "appropriate measures" and how the mitigation will be enforced. Goal 6: "Reduced emissionsengine use": Several plans are included in the analysis. How will the property owner ensure truck delivery vehicles comply with this aspirations? What are the legal enforcement procedures to be required by any/all future tenants? Can an example of the legal language proposed to be included in tenant agreements be provide at this time? Policy 6.3: "Encourage diversionto off peak periods"The analysis does not address off peak periods; why not? What are the enforcement/penalty for non-compliance that will be contractually obligated to the future tenants? Policy 6.4: "Work with Caltransto safely accommodate truck": Where is and who prepared/approved the queuing analysis? Traffic on the freeways 215 and 60 have increased dramatically the past several years and is only projected to get worse; what is the date of the queuing analysis? Does the queuing analysis provide sufficient data to support the statement "two or more car lengths"? What is Caltrans criteria? Analysis says 215 southbound was studied; what about 215 NORTHBOUND and the 60 freeway both directions that are already over burdened, resulting in que lines much more than two car lengths? Policy 7.3: What are "e		Policy 3.6: "regulate": what is the definition of regulate as identified herein? Does this include local city ordnances, Highway (freeway) lase and regulations etc.? How will compliance be assured? What is the penalty if trucks do comply with "designated truck routes"? Has the city of Moreno Valley been involved in designation of truck routes and possible fines for non-compliance regulations?	l-114.183
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Response to Comment Letter I-114

John Farnsworth July 21, 2024

I-114.1 This comment is Form Letter A. As such, please see Form Letter A Response. The comment references an attached spreadsheet with comments and questions. Specific comments are addressed in the following responses.

The comment generally alleges bias and favoritism in the EIR analysis and challenges the project objectives. Under CEQA, an EIR must describe a range of reasonable alternatives that would feasibly attain most of the basic objectives of the Proposed Project but would avoid or substantially lessen any of the significant effects of the Proposed Project and evaluate the comparative merits of the alternatives. The EIR and its technical reports analyzed the Proposed Project without bias. Chapter 5, Alternatives, of the EIR analyzed a reasonable range of alternatives in compliance with CEOA.

- I-114.2 This comment questions the preparation and release of the Draft EIR, as well as the consideration of public interests. As discussed in Chapter 1, Introduction, of the EIR, there have been multiple opportunities for public comment on the Proposed Project over the last 3 years. The NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. During the 30-day public review period of the NOP, March JPA held a scoping meeting on April 14, 2021. All issues and concerns raised in the comments have been fully addressed and analyzed in this EIR. The Draft EIR was distributed for a 45-day public review from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days to provide time for additional public input (although not required by CEQA). The applicant held community meetings on June 18, 2024, July 1, 2024, and September 24, 2025. Further, all comments received are responded to in this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.3 This comment questions the number and type of alternatives identified in the EIR. Pursuant to CEQA Guidelines Section 15126.6(a), an EIR is required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project." The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.4 This comment suggests a possible alternative that utilizes capacity at nearby airports. The alternative suggested by the comment does not meet most of the project objectives in Chapter 2, Project Description, of the EIR, including the objectives to "more fully utilize the operations capacity of the March Inland Port Airport to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region," "provide appropriate land use intensities to comply with the parameters of the March Air Reserve Base/Inland Port Airport Compatibility Plan," "improve access for airport users to the existing taxiways," and "facilitate development of aviation uses other than federal military aviation." See Response I-114.3 for a discussion of CEQA's requirements relating to the alternatives analysis. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation

Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- I-114.5 This comment questions the lack of data to support the "need" for increased cargo operations in the region. In response, please refer to Appendix Q, Regional Air Cargo Capacity Overview, of this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.6 This comment suggests an additional alternative to the ones analyzed in the EIR. Similar to the alternative suggested in Comment I-114.4, this alternative does not meet most of the project objectives in Chapter 2 of the EIR, including the objectives to "more fully utilize the operations capacity of the March Inland Port Airport to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region" [emphasis added], "provide appropriate land use intensities to comply with the parameters of the March Air Reserve Base/Inland Port Airport Compatibility Plan," "improve access for airport users to the existing taxiways," and "facilitate development of aviation uses other than federal military aviation." See Response I-114.3 for a discussion of CEQA's requirements relating to the alternatives analysis. The comment further notes some of the impacts of the Proposed Project, including sleep disturbance. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m.. Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. For a further discussion of Alternative 6, please see Chapter III of this Final EIR.
- I-114.7 This comment questions if additional alternatives could have been generated if the objectives did not favor the developer. A lead agency has broad discretion to formulate project objectives. "CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives" (California Oak Foundation v. Regents of the University of California [2010] 188 Cal.App.4th 227, 277). The objectives for the Proposed Project were selected by March JPA, and MIPAA concurs, to develop a reasonable range of alternatives as discussed in Response I-114.3. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.8 This comment questions what avigation easements currently exist for March ARB, March JPA, the developer, and other appropriate entities. As discussed in the 2018 March ARB AICUZ, March ARB has engaged in the establishment of avigation easements with specific landholders in Clear Zone areas outside of the base boundaries and has obtained approximately 39 avigation clearance easements associated with Runway 14/32. As discussed in the 2014 March ARB/Inland Port ALUCP, dedication of an avigation easement is required for new residential development for Zones A (Clear Zone), B1 (Inner Approach/Departure Zone), B2 (High Noise Zone), and High Terrain. Zone A easements are dedicated to March ARB; other avigation easements are dedicated to the March Inland Port Airport Authority. The comment further questions whether the Proposed Project would require additional avigation easements. As the Proposed Project does not involve residential development, no avigation

easement is required. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- **I-114.9** This comment questions the author of the EIR. As noted on the title page of the EIR, the document was produced and authored by Dudek for MIPAA.
- I-114.10 This comment questions who the primary contact is for the FAA. As noted in the Executive Summary, an EA is being prepared to study the impacts of the Proposed Project under NEPA. The FAA is the lead agency under NEPA and DAF is a cooperating agency. As the federal lead agency, FAA has primary responsibility to ensure that the EA complies with NEPA (42 USC 4321 et seq.). The FAA is conducting the NEPA process separately from the CEQA process. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.11 This comment questions who rejected the alternatives and when the alternatives were made available for public review. The alternatives were included in the Draft EIR that was made available for public review and comment from May 23, 2024, to July 22, 2024. As noted in Chapter 5 of the EIR,

Pursuant to the CEQA Guidelines, an EIR is required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives" (14 CCR 15126.6[a]). An EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation" (14 CCR 15126.6[a]). This alternatives discussion is required even if these alternatives "would impede to some degree the attainment of the project objectives or would be more costly" (14 CCR 15126.6[b]). The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is, in fact, "feasible." The final decision regarding the feasibility of alternatives lies with the decision maker for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives and reduces the severity of significant environmental effects pursuant to CEQA (California Public Resources Code Section 21081; refer also to 14 CCR 15091).

The EIR found that Alternative 4, the Private Aircraft Services Alternative, would be the Environmentally Superior Alternative (refer to EIR Table 5-1) because it would have the most reductions in impacts compared to the Proposed Project. As noted in Response I-114.6, however, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III of this Final EIR.

- I-114.12 This comment questions what "passenger" air services have been implemented to support the March AFB Redevelopment Plan. As discussed in the MIP Airport Master Plan Update, 102 MIP Airport does not hold a FAA Part 139 Certification, which would allow for scheduled commercial service flights. MIP Airport mostly handles cargo flights, as well as some passenger air charter operations. Air charter refers to an aircraft that is rented as a whole rather than seats being sold individually. The size of aircraft used for charter are typically much smaller than that used by a commercial airline and range anywhere from 4 to 20 or more seats. In the 2019 calendar year, MIP Airport handled a total of 1,234 cargo and air charter flights. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.13 This comment questions the meaning of the last paragraph on page ES-3 of the Executive Summary of the EIR. This paragraph describes the process through which March JPA assumed land use control for the surplus property identified by the March Joint Powers Redevelopment Agency and the approval of a General Plan for the same. This paragraph also describes that the Master EIR associated with the March JPA General Plan evaluated up to 1.44 million square feet of aviation facilities on 316 acres. The comment does not raise any specific questions, issues, or concerns regarding either the paragraph cited or the adequacy of the environmental analysis in the EIR.
- I-114.14 This comment questions the necessity of "late night operations." As noted in Response I-114.6, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). For a further discussion of Alternative 6, please see Chapter III of this Final EIR. Further, Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.15 This comment questions how flight operations will be enforced. Chapter 2 of the EIR has been revised to be clear that during the non-peak season there would be a maximum of 17 flights per day and during the peak season there would be a maximum of 21 flights per day. This revision does not constitute new information under CEQA and does not impact the environmental analysis in the EIR. Compliance with the mitigation measures through the Mitigation Monitoring and Reporting Program (MMRP) and other parameters posed in the EIR will be a condition of approval with which the Proposed Project must comply. MIPAA will monitor compliance through the MMRP. Please see Chapter IV, MMRP, of this Final EIR.

The comment further questions the lack of identification of a future potential tenant of the Proposed Project. As discussed in Chapter 2 of the EIR, there is no proposed tenant at this time. However, as a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by MIPAA for conformance with the EIR; non-conformance may require additional CEQA review.

I-114.16 This comment is in regard to enforcement of future tenant operational conditions. As required by MM-AQ-6 (Additional Air Quality Tenant Requirements), a copy of the MMRP will be attached to each

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March Inland Port Airport Authority. 2024. Master Plan Update. Draft. January 2024. https://marchjpa.com/wp-content/uploads/2024/01/2023-12-06_Draft-Report-Combined-OS12824.pdf.

tenant lease agreement. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR. Additionally, MIPAA tracks the time and numbers of flight operations to monitor compliance. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- I-114.17 This comment requests details regarding job opportunities from the Proposed Project. As discussed in Chapter 2, Section 2.3, Project Objectives, one of the objectives of the Proposed Project is to "Provide increased job opportunities for local residents through the provision of employment-generating businesses." As noted in Section 3.12, Transportation, Table 3.12-1, of the EIR the Proposed Project is anticipated to have approximately 150 employees. Because no tenant has been identified, it is unknown at this time what types of jobs these will be and who will be qualified for them. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.18 This comment questions how the fair-share cost, \$281,498, was calculated. As noted in Section 3.12.9, Traffic Analysis (Non-CEQA Analysis), in Section 3.12 of the EIR, the fair-share calculation for the Proposed Project was determined and included in Table 1-5 of the Traffic Analysis (Appendix M-1 of the EIR). In response to a request from the City of Moreno Valley (see Response A-6.11), PDF-TRA-1 has been revised to include a fair-share contribution for pavement maintenance for specified roadways over a 30-year cycle. Although project design features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the MMRP. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR for the revised language of PDF-TRA-1.
- I-114.19 This comment questions what improvements will be included and how the collected funds will be spent. As noted in Section 3.12.9 of the EIR, the fair-share calculation for the Proposed Project was determined and included in Table 1-5 of the Traffic Analysis (Appendix M-1 of the EIR). In response to a request from the City of Moreno Valley (see Response A-6.11), PDF-TRA-1 has been revised to include a fair-share contribution for pavement maintenance for specified roadways over a 30-year cycle. Although project design features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the MMRP. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR for the revised language of PDF-TRA-1. The fair-share cost or participation in the pre-existing fee programs such as the TUMF and Measure A can be used to construct identified recommended improvements (EIR Appendix M-1, Tables 8-1 and 8-2) that reduce off-site intersection deficiencies to achieve acceptable levels of service. The TUMF is administered by WRCOG and Measure A by Riverside County. The decision for collecting a fair-share contribution or constructing an improvement for reimbursement is determined by the approving jurisdiction (i.e., MIPAA). Commercial trucks pay annual registration fees to the California Department of Motor Vehicles, including additional fees based on weight. A majority of these fees, which can be used to maintain local roadways, are distributed to local governments (34.5%), Caltrans (25.1%), and the California Highway Patrol (19%).¹⁰³ Local government funds by cities are used for road maintenance such as repairing potholes or pavement. These funds come from property taxes, sales taxes, and other local revenue sources. Caltrans is responsible for the design, construction, maintenance, and operation of freeways

DMV (Department of Motor Vehicles). 2020. "Where Did Your 2019 Fees Go?" Accessed April 2025. https://www.dmv.ca.gov/portal/dmv-research-reports/department-of-motor-vehicles-dmv-performance-reports/where-did-your-2019-fees-go/.

and highways in the state, and therefore would be responsible for I-215 and other Caltrans facilities. The environmental analysis in the EIR addresses the Proposed Project's impacts to air quality, noise and transportation in detail and provides mitigation measures, as needed.

- I-114.20 This comment requests further details regarding the zoning designation of the project site. As shown in Figure 2-2 of the EIR, the land use designation of most of the project site is Aviation (AV). The project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown in Figure 2-3 of the EIR. The Off-Site Component within March ARB is designated as "March Air Reserve Base" on both the March JPA General Plan and zoning maps. Therefore, to be consistent with the current March JPA General Plan land use designation of Aviation (AV), the Proposed Project is requesting a zoning designation of Aviation (A) for the approximately 34-acre Air Cargo Center Component. As noted in Section 2.1, Project Location, of the EIR, the March JPA General Plan designates the parcels surrounding the project site as Aviation (AV) and Industrial (IND) (March JPA 1999a).
- I-114.21 This comment requests an explanation of how a project can move forward with a significant unavoidable impact. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions. As stated in CEQA Guidelines Section 15093, Statement of Overriding Considerations, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'"
- **I-114.22** This comment states that the impacts results are not included in EIR Table ES-1; however, both Tables ES-1 and ES-2 include the significance conclusions for the Proposed Project, including any significant and unavoidable impacts, as applicable.
- I-114.23 This comment questions why an impact is listed as "potentially significant" rather than "significant." Impacts are considered "potentially significant" if there is substantial evidence that it may be significant prior to implementation of applicable mitigation measures. After mitigation measures are applied and the impact is analyzed, the impact is either considered "less than significant with mitigation incorporated" or "significant and unavoidable." The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.24 This comment questions enforcement of MM-AQ-4 (Truck Requirements), the consequences for violation, and what a SmartWay truck is. As the lead agency, MIPAA would be responsible for enforcing mitigation measures, including MM-AQ-4. MIPAA has the authority to stop the Proposed Project if mitigation measures are not adhered to. A SmartWay truck is a long-haul freight vehicle that has been tested and validated by the EPA to reduce fuel consumption and air pollutant emissions. SmartWay trucks are part of the EPA's voluntary SmartWay Transport Partnership program, which aims to help businesses improve fuel economy, reduce emissions, and increase energy efficiency.

- I-114.25 This comment questions why MM-AQ-4 encourages the use of alternative fueled trucks, as well as new or retrofitted diesel trucks, instead of making it a contractual requirement. "Encouraging" the tenants provides flexibility in how the mitigation measure is implemented and allows for adaptive management as technologies change. No numeric emissions credit was taken in the analysis for MM-AQ-4.
- I-114.26 This comment questions what triggers the use of back-up generators. Back-up generators may be required if the facilities require consistent power for lighting, security systems, or other needs. Tenants may also use a back-up generator to protect against power outages or grid instability. Back-up generators are also typically used in refrigerated warehouses where perishable items are stored; however, such land use is prohibited in the Aviation Zone under the March JPA Development Code. If a refrigerated warehouse use was proposed, it would require rezoning and additional analysis under CEQA. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.27 This comment asks for the area or population density for a substantial number of people, as identified in Threshold AQ-4. The term "substantial number of people" is not explicitly defined in the CEQA Guidelines. The determination is made by the lead agency and can depend on several factors, including population density, proximity to sensitive receptors, community feedback, and regulatory standards. As detailed in Section 3.2, Air Quality, of the EIR, Threshold AQ-4 focused on odors as other potential air quality impacts to people were addressed in Thresholds AQ-1 through AQ-3. The impact analysis for Threshold AQ-4 focused on the Proposed Project's potential to generate other emissions (such as those leading to odors). As discussed in Threshold AQ-4, the nature, frequency, and intensity of the source; the wind speeds and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. The EIR lists land uses that are generally associated with odor complaints and concludes the Proposed Project would not contain such land uses. Potential odor sources may result from construction equipment exhaust during construction. The SCAQMD regulates standard construction requirements (e.g., SCAQMD Rule 402), which would minimize any potential odor impacts.
- Inis comment asks about the MMRP and how compliance will be enforced. An MMRP is a Mitigation Monitoring and Reporting Program. California Public Resources Code, Section 21081.6(a)(1), requires a lead agency (i.e., MIPAA) to adopt a "reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." An MMRP has been prepared as part of this Final EIR to monitor mitigation measures set forth in the EIR for the Proposed Project. For each listed mitigation measure, the mitigation measure number and content, the timing of monitoring/reporting for the mitigation measure, and method and enforcing agency and responsible agency for implementing/reporting are identified along with verification of compliance. See Chapter IV of the Final EIR. In addition, compliance with the MMRP will be a condition of approval of the Proposed Project. As noted above, the Proposed Project must comply with applicable conditions of approval to move forward.
- I-114.29 This comment questions why a project should be considered when there will be significant mitigation required and why a project should be allowed to proceed if unavoidable consequences will result. Under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts. For further discussion, please refer to Response I-114.21, above. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- I-114.30 This comment asked about co-benefits from MM-AQ-5 (Commute Trip Reduction). MM-AQ-5 is intended to reduce employee commute trips. The provision of preferential parking spaces is intended to encourage employees to carpool or vanpool together. The provision of short- and long-term bicycle parking is intended to encourage alternative transportation. The provision of showers, lockers, and changing space is intended to encourage bicycling or other alternative transportation because employees can prepare for work after completing their trip. The provision of on-site food encourages employees to stay on-site for food breaks rather than make trips off-site, resulting in vehicle trips. The requirement to establish and promote a rideshare program helps to discourage single-occupancy vehicle trips. Altogether, the measures in MM-AQ-5 help to reduce commute trips through ridesharing, encouraging alternative transportation, and reducing off-site trips, which result in the co-benefit of reduced criteria air pollutant and GHG emissions. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.31 This comment asks if EV charging stations would be open for consumer/public use. The EV charging stations installed by the Proposed Project are intended to be limited to on-site employees of the facility. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.32 This comment asks about restrictions for cargo from transporting hazardous materials. Section 3.8, Hazards and Hazardous Materials, of the EIR describes in more detail the impacts associated with construction and operational activities as a result of the Proposed Project. Overall, these activities would be subject to existing regulations governing the transport of hazardous materials. For example, airplane fueling operations and maintenance activities would be subject to the NPDES Industrial General Permit. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- Inis comment raises concern for people residing in the project area who may be exposed to excessive noise. As discussed in the California Airport Land Use Planning Handbook, "the goal of airport compatibility planning is to reduce annoyance and to minimize the number of people exposed to excessive levels of aircraft noise....The ALUCP is designed to encourage compatible land uses in the vicinity surrounding an airport." It provides for the "orderly growth of each public airport and the area surrounding the airport" while safeguarding "the general welfare of the inhabitants within the vicinity of the airport and the public in general" (California Public Utilities Code, Section 21675[a]). Section 3.8 of the EIR only analyzes the impact on people working in the project area given that the Proposed Project would not introduce residential land uses within the March ARB/Inland Port Airport ALUCP airport influence area. Given that the Proposed Project would not generate new residents on site, the EIR does not include analysis of people residing within the project area.

Impacts of Proposed Project noise on residences are addressed in Section 3.11, Noise, of the EIR. As discussed in Section 3.11, the Proposed Project's aircraft operational noise increases may exceed the applicable noise increase thresholds for noise-sensitive receptors located in the vicinity of the southwest portion of the Markham Street and Brennan Avenue intersection. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e., acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult.

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¹⁰⁴ Caltrans (California Department of Transportation). 2011. *California Airport Land Use Planning Handbook*. October 2011. https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf.

The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement of affected residences in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-114.34 This comment questions where the noise study is located and contents for Threshold NOI-1. A Noise Impact Analysis was prepared by Urban Crossroads in April 2023 and is included in the EIR as Appendix L-1. The analysis contained within the report assessed ground-level noise levels, including noise generated from the March ARB. As discussed in Section 3.11 of the EIR, aircraft noise was analyzed under Threshold NOI-3.
- I-114.35 This comment asks how "identified and disclosed" language in MM-NOI-2 satisfies the noise level requirements. This phrase, as supported by context of MM-NOI-2, tells a reader that the EIR predictive noise analyses and impact findings with respect to Threshold NOI-3 (and thus as presented in the EIR noise section) serve to set a cap above which documentation of expected tenant's future fleet mix noise emissions cannot exceed without subsequent environmental review. The comment goes on to ask where this information is included in the EIR. Noise impacts are analyzed in Section 3.11 of the EIR. The comment then asks how MM-NOI-1 (Construction Worker Hearing Protection) and MM-NOI-2 apply to cumulative noise levels. Cumulative noise levels are discussed in Section 3.11.8, Cumulative Effects, of the EIR, addressing both construction noise and operation noise associated with Proposed Project acoustical contributions.

Lastly, the comment asks why the Proposed Project should be allowed to proceed knowing that significant and unavoidable impacts will occur. The purpose of the EIR is to identify potential significant and unavoidable impacts and thus inform, per CEQA process, stakeholders and decision-makers regarding if and under what conditions the Proposed Project would proceed. Under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts. For further discussion, please refer to Response I-114.21, above.

I-114.36 This comment questions why MM-TRA-1 (Construction Transportation Management Plan) is limited to construction. MM-TRA-1 is limited to construction because a construction traffic management plan is designed to manage and mitigate traffic and impacts during the construction phase of the Proposed

Project. Once a project becomes operational, the impacts of the project and traffic patterns are different, and the construction traffic management plan is no longer necessary. **MM-TRA-2** (Project Truck Route on Heacock Street) is designed to mitigate operational impacts. The comment further questions how the requirements of **MM-TRA-1** will be monitored or legally required. As noted in Response I-114.15, compliance with the mitigation measures will be a condition of approval of the Proposed Project and MIPAA is responsible for monitoring such compliance.

- I-114.37 This comment raises concern for the impact conclusions related to utilities and service systems. Section 3.14, Utilities and Service Systems, of the EIR describes and analyzes the Proposed Project's impacts and substantial evidence to support the EIR's conclusion of less than significant. This section was supported by substantial evidence as referenced in Section 3.14.8 and within technical appendices, such as the Preliminary Hydrology Study (Appendix K-1 of the EIR) and the Proposed Project-specific Water Quality Management Plan (Appendix K-2 of the EIR). In addition, the comment notes planned improvements to Heacock Street. Improvements along or related to Heacock Street are disclosed and analyzed in Section 3.14 of the EIR.
- I-114.38 This comment questions the reduction rate under Alternative 3, Reduced Flight Operations. The EIR analyzes reasonably feasible alternatives that attain most of the basic objectives of the Proposed Project. As discussed in Response I-114.3, above, an EIR need not consider every conceivable alternative to a project (14 CCR 15126.6[a]). In addition, as noted in Response I-114.6, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- **I-114.39** This comment questions the information presented in Table ES-2 of the EIR. The number of public flights is not identified or compared in this table as it is a summary of impact determinations. See Chapter 5 of the EIR for more discussion on flight operations across each alternative.
- In the comment raises concern for mitigation incorporated within each alternative. The comment further questions why the EIR did not include an alternative that did not require mitigation. In the event mitigation is required to reduce impacts, all impacts were reduced to a level below significance, except for air quality and noise, where significant and unavoidable impacts are anticipated under Alternatives 2 and 3. Additional alternatives were considered but rejected, as detailed in Section 5.3 of the EIR. The alternatives presented in the EIR represent reasonably feasible alternatives to the Proposed Project that attain most of the basic objectives of the project. An EIR is required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project" (14 CCR 15126.6[a]).
- I-114.41 This comment raises concern for the project objectives. The primary objectives of the Proposed Project are listed in Section 2.3 of the EIR. CEQA Guidelines Section 15124(b) requires an EIR to include a statement of objectives sought by the project. These objectives are required to guide the lead agency to develop a reasonable range of alternatives in the EIR. In addition, the project objectives include the

underlying purpose of the project and may discuss the project benefits. The comment questions why the alternatives are not more "residentially friendly." Residential uses are not appropriate for the project site. As discussed in Section 3.8 of the EIR, the project site is subject to Environmental Restrictive Covenants, which prohibit "residential, schools for persons under 18 years of age, day care, or hospital for human care." See Appendix J-2 of the EIR. The project site is designated Aviation under the March JPA General Plan, which allows uses such as "flightline, hangers, aviation support services, inclusive of fuel systems and dispensing, air cargo storage, passenger and air cargo terminals, fixed base operations, aircraft maintenance and aviation operation services." Under the March JPA Development Code Table 9.02.020-1, the Aviation zoning district does not allow residential uses. As discussed in Section 3.10, Land Use and Planning, of the EIR, under the March ARB/Inland Port ALUCP, the project site is located in the B2 Zone, which is subject to high noise and a moderate accident potential risk. The land uses prohibited within the B2 Zone include new dwellings, children's schools, daycare centers, libraries, hospitals, congregate care facilities, hotels/motels, places of assembly, buildings with more than three aboveground habitable floors, noise-sensitive outdoor nonresidential uses, critical community infrastructure facilities, and hazards to flight.

- I-114.42 This comment raises concern for impacts to the local vicinity of the project site, specifically related to transportation. For traffic impacts, including truck traffic, see the non-CEQA analysis presented in Section 3.12.9 of the EIR. Regarding the potential for future road improvements and repairs, please refer to Response I-114.19, above.
- I-114.43 This comment asks for a definition of "feasible" as used throughout the EIR. "Feasible" is defined in California Public Resources Code, Section 21061.1, as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." Section 15364 of the CEQA Guidelines further adds the term "legal" to the list of factors to take into account when considering feasibility. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- It is comment asks about a statement of overriding considerations. A statement of overriding considerations is not included in a EIR. As stated in Section 15093 of the CEQA Guidelines, "CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposal project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered 'acceptable.'" If the lead agency approves such a project, it must adopt a statement of overriding considerations, which provides the specific reasons to support its action based on the final EIR and/or other information in the record. The statement of overriding considerations would be included in the agenda packet prior to the consideration of project approval.

March JPA (Joint Powers Authority). 1999. General Plan of the March Joint Powers Authority. https://www.marchjpa.com/documents/docs_forms/general_plan_updt_011718.pdf.

- **I-114.45** This comment requests a definition of "regional demands for air cargo services" and requests the data to support the statement "alleviating congestion and overtaxed facilities." In response, please refer to Appendix Q of this Final EIR.
- **I-114.46** This comment questions the types of jobs anticipated under the Proposed Project, specifically if the potential jobs would require more than a high school education or technical training. In response, please refer to Response I-114.17, above.
- I-114.47 This comment questions about the ratio of new jobs projected for the Cities of Riverside, Moreno Valley, and Perris. As further detailed in Section 4.2.7, Population and Housing, of the EIR, the Proposed Project is anticipated to generate approximately 150 permanent employment opportunities. As discussed in Chapter 4, Other CEQA Considerations, of the EIR, it is anticipated that these new jobs would be filled by the existing residential population from the greater Riverside County area, including the Cities of Riverside, Moreno Valley, and Perris. However, it would be speculative to estimate the ratio of these new jobs for the Cities of Riverside, Moreno Valley, and Perris. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.48 This comment questions the VMT impact associated with the Proposed Project's potential future employees. Section 3.12 of the EIR assesses VMT based on the Proposed Project's ability to exceed 15% below the WRCOG baseline of 29.97 VMT per employee, for a regional average significance threshold of 25.47 VMT per employee. As such, the EIR analyzed the Proposed Project's VMT per employee in comparison with the WRCOG baseline. The Proposed Project's VMT per employee of 23.12 would be below the WRCOG significance threshold. As further detailed in Section 3.12, VMT is based on a methodology with estimates and analysis inclusive of the scenarios described by the comment. For more information on VMT analysis, see the WRCOG Guidelines and Appendix M-2 of the EIR.
- **I-114.49** This comment asks about road improvements for local and freeways. Regarding the potential for future road improvements and repairs, please refer to Response I-114.19, above.
- I-114.50 This comment requests analysis for freeway expansion. The EIR analyzes the Proposed Project's potential to impact vehicle queuing at freeway ramps. The Proposed Project does not require expansion of existing freeways and therefore the EIR does not discuss such expansion. As discussed in Section 3.12 of the EIR, the Proposed Project's impacts related to transportation would be less than significant.
- I-114.51 This comment asks about nighttime truck traffic on freeways and possible mitigation. The Traffic Analysis (Appendix M-1 of the EIR) provides analysis of the Proposed Project's potential effects relative to General Plan consistency with LOS policies. Pursuant to California Public Resources Code, Section 21099(b)(2), and CEQA Guidelines Section 15064.3(a), a project's effect on automobile delay is not considered a significant environmental effect. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 and MM-TRA-2, the Proposed Project's transportation impacts would be less than significant. As such, the analysis and discussion were included in EIR Appendix M-1 only for informational purposes. However, the EIR analyzes the Proposed Project's potential to impact vehicle queuing at freeway off-ramps. Less-than-significant impacts were determined, including during the PM peak hours in all scenarios (see Table 3.12-4 and Table 3.12-5 of the EIR).

- I-114.52 This comment asks if the proposed fencing would be constructed to reduce noise levels. As described in Chapter 2 of the EIR, a 14-foot-high fence compliant with Department of Defense regulations and requirements would be installed along the project site's northern boundary. Along the project site's southern boundary and along the site access roadway, a 10-foot-tall tube steel fence would be installed. In addition, a 12-foot-tall concrete masonry unit wall would be installed in the interior of the site to separate Site 7 from areas within the project site accessible to trucks and employees. These fences may contribute some noise reduction. However, as discussed in Section 3.11 of the EIR, ground-level operational noise would be less than significant. Fencing would not attenuate aircraft noise. As discussed in Appendix L-1 of the EIR, "a noise barrier is most effective when placed close to the noise source or receiver. Noise barriers, however, do have limitations. For a noise barrier to work, it must block the line-of-sight path of sound from the noise source."
- I-114.53 This comment asks if the cargo building would have dual-pane windows. MM-AQ-3 (Improved Energy Efficiency and Water Reduction) requires the cargo building to have modestly enhanced window insulation (0.28 or less U-factor, 0.22 or less solar heat-gain coefficient). This will include dual-pane windows.
- I-114.54 This comment requests the definition of "non-peak." The question is in regard to the Proposed Project's operations and flights per day. As discussed in Section 2.4.2, Project Operations, of the EIR, peak season refers to a 4-week period beginning in late November through late December. Non-peak refers to the remaining 48 weeks of the year.
- I-114.55 This comment asks for the definition of "no storage." The question is in regard to the Proposed Project's operations at the air freight cargo building, where the air cargo would be placed onto trucks and conveyed to distribution centers. As described in the EIR, the process would also occur in reverse, from a distribution center to the cargo building. No storage of cargo would occur during the periods of transferring from distribution center to the cargo building.
- **I-114.56** This comment questions the calculation for the amount of fair-share contributions. This comment is duplicative of Comment I-114.18. In response, please refer to Response I-114.18, above.
- I-114.57 This comment asks for a copy of the separate environmental document associated with the Proposed Project. The statement within the EIR refers to the evaluation under NEPA, which is undergoing review with the FAA as the lead federal agency and the DAF as the cooperating agency. See Response I-114.10 for a further discussion of the NEPA process.
- I-114.58 This comment asks where feasible mitigation measures are located within the EIR. For a summary of mitigation measures, see Chapter IV of this Final EIR. In addition, all mitigation measures incorporated into the EIR are summarized in Table ES-1.
- I-114.59 This comment questions the term "consistency findings" associated with the Riverside County Airport Land Use Commission. As discussed in the California Airport Land Use Planning Handbook, "the goal of airport compatibility planning is to reduce annoyance and to minimize the number of people exposed to excessive levels of aircraft noise....The ALUCP is designed to encourage compatible land uses in the vicinity surrounding an airport." 106 It provides for the "orderly growth of each public airport and the area

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¹⁰⁶ Caltrans (California Department of Transportation). 2011. California Airport Land Use Planning Handbook. October 2011. https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf.

surrounding the airport" while safeguarding "the general welfare of the inhabitants within the vicinity of the airport and the public in general" (California Public Utilities Code, Section 21675[a]). The Riverside ALUC reviews projects to determine consistency with the March ARB/Inland Port ALUCP. On March 13, 2025, the Riverside ALUC determined the Proposed Project to be consistent with the March ARB/Inland Port ALUCP, subject to specific conditions. See Appendix R of the Final EIR. The Proposed Project would be conditioned to comply with the ALUC conditions.

- I-114.60 This comment questions the permits required for implementation of the Proposed Project. See Table 2-4 of the EIR. For example, the Proposed Project would be required to obtain a Clean Water Act Section 404 Nationwide Permit from the U.S. Army Corps of Engineers.
- I-114.61 This comment questions why the City of Moreno Valley's regulatory input is limited to the construction traffic control plan. This is in reference to MM-TRA-1, which is incorporated to reduce potentially significant impacts during the Proposed Project's construction activities. During operations, traffic, particularly truck traffic on Heacock Street, was identified as having the potential to result in significant impacts. The City of Moreno Valley will be consulted to address any construction-related traffic issues affecting city streets. Once operational, Proposed Project truck traffic will use truck routes designated by March JPA and the City of Moreno Valley. MM-TRA-2 ensures truck traffic will utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. The intersection improvements at Heacock Street shall include installed signage directing trucks to the Harley Knox Boulevard interchange. See Section 3.12 of the EIR for further details.
- I-114.62 This comment requests to review all public comment letters on the Draft EIR. All comments received are responded to in this Final EIR. These comments, along with Comment Letter I-114, are included in this chapter of the Final EIR. The public comments received during the EIR's public review period are used to inform the decision makers in their consideration of the Proposed Project. Chapter III of this Final EIR provides the revisions to various sections of the EIR. These revisions do not constitute new information under CEQA and do not impact the environmental analysis in the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.63 This comment requests the definition/usage parameters of 14 CCR 15130(a)(3) and 14 CCR 15130(b)(5). These are references to sections of the CEQA Guidelines, found in California Code of Regulations Title 14 Section 15130 and associated subsections, and were cited for the quoted language.
- I-114.64 This comment raises concern for the list of cumulative projects included in Table 3-1 of the EIR. As discussed in Chapter 3, Environmental Analysis, of the EIR, the cumulative projects list was developed through consultation with planning and engineering staff from March JPA, the City of Riverside, the City of Moreno Valley, the City of Perris, and the County of Riverside to include key projects in their respective jurisdictions. The comment identifies several projects as omitted. The West Campus Upper Plateau Project is included in Table 3-1. Per CEQA Guidelines Section 15125, the environmental baseline for a project is established by the date on which the NOP is filed. The NOP for the Mission

Grove Apartments (K-Mart Apartments) was published on October 27, 2022.¹⁰⁷ As discussed in the EIR and shown in EIR Appendix A, the NOP for the Proposed Project was published on March 31, 2021.

- I-114.65 This comment is duplicative of Comment I-114.39. As such, please refer to Response I-114.39, above.
- I-114.66 This comment is duplicative of Comment I-114.40. As such, please refer to Response I-114.40, above.
- I-114.67 This comment requests revisions to Table 3-1 of the EIR to provide project names for the City of Riverside's cumulative projects. The numbering convention used by the City of Riverside is related to their plan check and permitting process. Descriptions on the proposed land use, quantity, and unit are available to provide context to the cumulative projects within the City. Figure 3-1 in the EIR identifies the location of the projects listed in Table 3-1.
- I-114.68 This comment questions if FAA Form 7460-1 could be used to implement revisions to the airport flight paths. FAA Form 7460-1 is used for construction or alteration on an airport and does not relate to flight paths. As noted in Section 3.11.5, Impacts Analysis, under Threshold NOI-3, of the EIR, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types.
- I-114.69 This comment requests revisions to the airport flight paths. See Response I-114.68.
- I-114.70 This comment requests revisions to the airport flight paths. See Response I-114.68.
- **I-114.71** This comment requests revisions to the airport flight paths. See Response I-114.68.
- I-114.72 This comment asks for the definition of viewshed and its association with residential uses. A viewshed refers to the surface areas visible from an observer's (e.g., motorist, resident, recreationist, pedestrian) viewpoint. In determining visibility, a viewshed also considers the screening effects of intervening vertical features such as terrain, buildings, and vegetation. Section 3.1, Aesthetics, of the EIR contains two references to "viewshed" and states that, "the east elevation of the cargo building would be oriented toward Heacock Street and an existing Lowe's distribution warehouse and would not be within the viewshed of residential land uses." In this specific reference, the EIR is stating that the east-facing elevation of the proposed cargo building would not be visible from nearby residential land uses so the comment's question as to why viewshed is not "more pertinent" to residential land uses is unclear.
- I-114.73 This comment asks whether the reports cited in the Section 3.2 of the EIR can be provided in paper form and electronically. The NOA for the Draft EIR, published on May 23, 2024, provides the location where the paper format of the Draft EIR and associated technical appendices can be reviewed and where they can be obtained electronically. If a personal paper copy is requested, MIPAA can be contacted to reproduce the requested documents. According to March JPA's CEQA guidelines, the agency may charge and collect a reasonable fee from members of the public that request a paper copy of an environmental document, so long as the fee does not exceed the cost of reproduction.
- I-114.74 This comment asks which state and local agencies are directed to make investments that benefit California's disadvantaged communities pursuant to SB 535. SB 535 requires several state and local agencies to make investments that benefit disadvantaged communities. The bill mandates that at least 25% of the proceeds from the state's Cap-and-Trade Program be allocated to projects that provide

State of California. 2025. "Mission Grove Apartments." https://ceqanet.opr.ca.gov/2022100610.

benefits to disadvantaged communities, with at least 10% of the funds going to projects located within these communities. CalEPA is responsible for identifying disadvantaged communities based on various criteria, including geographic, socioeconomic, public health, and environmental hazard factors. The Department of Finance is also involved in developing investment plans and guidelines to ensure that the funds are appropriately allocated. California's Cap-and-Trade funds for disadvantaged communities are distributed through the California Climate Investments (CCI) program. CCI are administered by state and local agencies for a variety of GHG cutting programs, including energy efficiency, public transit, low-carbon transportation, and affordable housing. Guidelines written by CARB help these agencies develop programs that meet statutory requirements for reducing emissions while maximizing the benefits to disadvantaged communities. In summary, a variety of state (CARB, CalEPA) and local (cities, counties, etc.) agencies are involved in the investments of funds to benefit disadvantaged communities.

I-114.75 This comment asks how SCAQMD Rules 402 and 2305 are addressed to show compliance. The Proposed Project would comply with Rule 402 by not emitting any air pollutants that cause a nuisance. SCAQMD enforces Rule 402, which addresses public nuisances, through a combination of inspections, investigations, and penalties. SCAQMD inspectors respond to complaints from the public about nuisances such as odors, smoke, or dust. They conduct on-site inspections to determine if there is a violation of Rule 402, which prohibits the discharge of air contaminants that cause injury, detriment, nuisance, or annoyance to a considerable number of people. If a violation is found, SCAQMD can issue notices of violation and require corrective actions. Persistent or severe violations can lead to civil penalties, which can be substantial. The public plays a crucial role in enforcement by reporting nuisances to SCAOMD. This helps the agency identify and address issues promptly.

Rule 2305, Warehouse Indirect Source Rule, also known as the WAIRE Program, requires warehouses greater than 100,000 square feet to directly reduce NO_x and DPM emissions or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. Rule 2305 defines "warehouse" as "a building that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers." As discussing in Response I-114.55, the Proposed Project is an air cargo facility without storage. The Proposed Project would not be a warehouse under Rule 2305. Should SCAOMD determine the Proposed Project is subject to Rule 2305, the building operator would submit the required basic information (Warehouse Operations Notification) about the building. Annual reports are required for compliance. SCAQMD's Rule 2305 is enforced through a combination of compliance requirements, reporting, and penalties. WAIRE is a menu-based point system. Warehouse operators are required to earn a specific number of points every year. Warehouse operators must earn WAIRE Points by completing actions from the WAIRE Menu, implementing an approved Custom WAIRE Plan, or paying a mitigation fee annually. These actions are designed to reduce emissions from warehouse operations. Warehouse owners and operators are required to submit various reports, including the Annual WAIRE Report, which details their compliance activities and WAIRE Points earned. These reports must be submitted through the WAIRE Program Online Portal. SCAQMD conducts inspections and reviews submitted reports to ensure compliance. If a facility is found to be non-compliant, SCAOMD can issue notices of violation and require corrective actions. Persistent non-compliance can result in significant penalties.

I-114.76 This comment asks how the Proposed Project would comply with March JPA General Plan Noise/Air Quality Policy 6.1, reducing idling emissions by increasing traffic flow through synchronized traffic signals, and Policy 6.3, encouraging the diversion of peak hour truck traffic. As discussed in

Table 3.10-1 of the EIR, the Proposed Project is consistent with Policy 6.1 because the Proposed Project's traffic signal would be synchronized with other signals along Heacock Street. The Proposed Project is consistent with Policy 6.3 because MM-AQ-3 requires the annual provision of information to employees and truck drivers about EV charging availability, alternate transportation opportunities for commuting, the Voluntary Interindustry Commerce Solutions "Empty Miles" program to improve goods trucking efficiencies, and efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

- I-114.77 This comment alleges the Environmental Justice Element remains under scrutiny and its applicability is uncertain to the public and asks why these statements were not disclosed. March JPA adopted the Environmental Justice Element in April 2024. Although there is ongoing litigation (Riverside Superior Court Case No. CVRI2402936), the Environmental Justice Element is a part of the March JPA General Plan and the EIR evaluated the Proposed Project's consistency with the element. The EIR discussed the Environmental Justice Element and its goal of considering environmental justice policies to improve public health and the environment within the March JPA Planning Area. The comment regarding the public perception of the Environmental Justice Element reflects an opinion and does not raise a specific environmental concern.
- I-114.78 This comment asks how the Proposed Project complies with Environmental Justice Element Policy HC 16.5, evaluate compatibility of unhealthy and polluting land uses near sensitive receptors, and Policy HC 16.18, promote job creation and reduced VMT. As discussed in Table 3.10-1 of the EIR, the Proposed Project is consistent with Policy HC 16.5 because north of the project site is March ARB; east of the project site is the Site 7 Area, followed by Heacock Street and existing warehouse operations; west of the project site is the existing airport tarmac/taxiway within March ARB, followed by I-215; and south of the project site are the existing warehouse operations associated with the KRIV-Amazon and Hanes/DDI cargo storage and distribution facilities. The nearest residential area is approximately 0.5 miles to the east. The EIR includes an evaluation of the Proposed Project's impacts to sensitive receptors, such as residences and schools. With respect to Policy HC 16.18, the Proposed Project would provide more local jobs to achieve a more favorable jobs/housing balance. The Proposed Project would reduce commutes to large urban centers such as Los Angeles or Orange County and reduce VMT associated with longer commutes. Further, the Proposed Project will implement MM-AO-3 through MM-AQ-6 and MM-GHG-1 (Installation of EV Charging Stations), which are discrete mitigation measures aimed at reducing criteria air pollutant and GHG emissions. Specifically, MM-AO-5 would include commute trip reduction measures and encourage alternative transportation methods and ridesharing.
- I-114.79 This comment asks how the criteria to evaluate conflicts with the AQMP, Consistency Criterion No. 1 and No. 2, specifically the terms "will not result" regarding Criterion 1 and "will not exceed" regarding Criterion 2, were calculated and by whom. SCAQMD, as the expert agency for air quality with jurisdiction over the SCAB, in which the Proposed Project is located, established the criterion for evaluating consistency with the AQMP in Chapter 12, Sections 12.2 and 12.3, of the SCAQMD CEQA Air Quality Handbook. The EIR provides an explanation from SCAQMD on how Criterion 1 is evaluated regarding whether a project will result in an increase in the frequency or severity of existing air quality violations. The violations that Consistency Criterion No. 1 refer to are the CAAQS and NAAQS. CAAQS and NAAQS violations could occur if regional or localized significance thresholds are exceeded. The EIR provides a discussion from SCAQMD on how Criterion 2 is evaluated regarding whether a project exceeds the growth assumptions in the AQMP. The 2022 AQMP demonstrates that the applicable ambient air quality

standards can be achieved within the time frames required under federal law. Growth projections from local general plans adopted by 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 growth projections in the March JPA General Plan is consistent with the AQMP.

- Inis comment questions the use of modeling that relied on a construction start date that has since passed and asks if new modeling can be prepared. The modeling used in the analysis was prepared at the time of the Draft EIR preparation, using the best available information regarding potential timing for construction start dates. As noted in Section 3.2 of the EIR, the construction schedule used in the analysis, shown in EIR Table 3.2-7, represents a conservative analysis scenario because emissions factors for construction decrease as time passes and the analysis year increases due to emissions regulations becoming more stringent. The duration of construction activity and associated equipment represents a reasonable approximation of the expected construction fleet, as required per the CEQA Guidelines. Accordingly, revised modeling is not required because the impacts have been adequately disclosed. See also Appendix B-2 of the EIR.
- In this comment questions why aircraft emissions are not considered in the CO hotspot analysis. CO hotspot modeling for aircraft emissions is not scientifically required for several reasons. Aircraft emissions are typically released at higher altitudes where they disperse more quickly and widely compared to ground-level sources. This rapid dispersion reduces the likelihood of CO concentrations reaching levels that would create a hotspot. Modern aircraft engines are designed to be more efficient and produce lower levels of CO compared to older models. The overall contribution of CO from aircraft is relatively small compared to other sources like motor vehicles. In addition, regulatory agencies often prioritize CO hotspot analyses for ground-level sources, such as busy intersections or congested roadways, where CO concentrations are more likely to pose a health risk. Lastly, current guidelines and models used for CO hotspot analysis, such as those provided by the EPA, focus on ground-level emissions and do not typically include aircraft emissions due to their different dispersion patterns and lower impact on ground-level air quality. 108,109
- I-114.82 This comment is duplicative of Comment I-114.79. As such, please refer to Response I-114.79, above.
- I-114.83 This comment asks how the Proposed Project can be considered knowing that emissions are not in accordance with regulations and asks about altering goals and objectives. The Proposed Project would be developed in accordance with regulations. Regulations are required to be followed and are enforced by the applicable regulatory agency. As disclosed in Section 3.2 of the EIR, the Proposed Project's regional emissions would exceed the regional significance thresholds for VOCs, NO_x, and CO. With the incorporation of mitigation, the Proposed Project would still exceed the regional significance thresholds for these pollutants and as such would result in significant and unavoidable impacts. Under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts. For further discussion, please refer to Response I-114.21, above. Regarding altering goals and objectives, the EIR evaluated alternatives in accordance with CEQA in Chapter 5 of the EIR. The purpose of the alternatives analysis is to identify options that could feasibly achieve most

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EPA (U.S. Environmental Protection Agency). 2025. "Project-Level Conformity and Hot-Spot Analyses" Last updated February 14, 2025. https://www.epa.gov/state-and-local-transportation/project-level-conformity-and-hot-spot-analyses.

Caltrans (California Department of Transportation). 2010. "Searchable PDF of CO Protocol." October 13, 2010. https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/co-protocol-searchable-a11y.pdf.

of the project's basic objectives while avoiding or substantially lessening any significant environmental impacts.

I-114.84 This comment questions the EIR's statement that there are no feasible mitigation measures to reduce aircraft criteria air pollutant emissions and asks who decides there are no feasible measures. The comment also asks if feasible measures could include flying smaller planes, fewer planes, changing the flight path, hours of operation, or other options. Feasibility is defined by CEOA as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (14 CCR 15364). The lead agency (i.e., MIPAA) has the sole discretion to determine the feasibility of mitigation measures based on these factors. As noted in Section 3.2 of the EIR, aircraft technology to control emissions has not been developed, although research is ongoing for controlling VOC, NOx, and CO emissions and improving fuel efficiencies. Additionally, MIPAA does not have regulatory authority over aircraft emissions; FAA and EPA are the regulatory agencies that have authority over aircraft emissions. The Proposed Project did consider alternatives that included the use of smaller planes (Private Aircraft Alternative), fewer planes (Reduced Flight Operations Alternative), and reduced hours of operation (Nighttime Flight Noise Reduction Alternative). The flight paths of planes are coordinated through a process that involves several key factors and stakeholders such as Air Traffic Control, flight dispatch planning, weather conditions, airspace restrictions, aircraft performance, and environmental and noise considerations. This careful coordination of flight paths is done to ensure efficiency and safety.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-114.85 This comment asks what conflicts the Proposed Project would have with the AQMP, specifically regarding Criterion 1 for Threshold AQ-1, and alleges these conflicts are not addressed and considered. Threshold AQ-1 addresses and considers the impact of potential conflicts with the AQMP. Criterion 1 for Threshold AQ-1 evaluates the conflict through potential air quality violations as measured by exceedances of regional and localized thresholds of significance established by SCAQMD. The Proposed Project would exceed the regional operational significance thresholds for VOC, NOx, and CO despite the incorporation of mitigation measures. As such, the Proposed Project would conflict with the AQMP, meaning it could delay the attainment of air quality standards as outlined in the AQMP. The conflict with the AQMP is identified as a significant and unavoidable impact. The comment also asks why the Proposed Project should be approved knowing there are significant and unavoidable consequences and asks for a response regarding all the significant and unavoidable impacts with respect to air quality and other EIR sections. Under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts. For further discussion, please refer to Response I-114.21, above.
- I-114.86 This comment asks how the peak season would not be more harmful than the non-peak season, which the comment identifies as 10 months out of the year. As discussed in Section 2.4.2, Project Operations, of the EIR, peak season refers to a 4-week period beginning in late November and going through late December. Non-peak refers to the remaining 48 weeks of the year. The SCAOMD regional threshold of

significance is based on a daily maximum of criteria air pollutant emissions. Table 3.2-11 of the EIR provides the non-peak daily maximum emissions; these emissions would be the maximum daily emissions that would be experienced during the 48-week period of the non-peak season. The table does not provide a summary of the total emissions for the 48-week period. Table 3.2-12 of the EIR provides the peak daily maximum emissions; these emissions would be the maximum daily emissions that would be experienced during the 4-week period of the peak season. The table does not provide a summary of the total emissions for the 4-week period. Because the intensity of activities would be greater under the peak season vs. under the non-peak season, the maximum daily emissions reported are greater under the peak season.

- I-114.87 This comment states that sensitive receptors include residences and asks how it was determined that the residences would not be impacted by substantial pollutant concentrations. The comment asks for the data and who prepared the analysis to support the conclusion. SCAQMD 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 a localized significance threshold (LST) analysis. LSTs apply to CO, NO_x, PM₁₀, and PM_{2.5}. The EIR evaluated the LST impacts to sensitive receptors (residences) in impact Threshold AQ-3; as shown in the analysis there would be less-than-significant impacts to residences. In addition, HRAs were prepared to evaluate both construction and operational health risks from toxic air contaminants in Threshold AQ-3. The HRAs were prepared in accordance with guidance from SCAQMD and OEHHA. As shown in the HRAs, there would be less-than-significant health risks to sensitive receptors (residences). Details of the LST analysis are included in the Air Quality Impact Analysis Technical Report prepared by Urban Crossroads (Appendix B-1 of the EIR). The HRAs were also prepared by Urban Crossroads and are included as Appendix C-1 to the EIR.
- I-114.88 This comment questions how it is possible for the peak season maximum daily emissions to be lower for CO, PM (PM₁₀), and PM_{2.5} than the non-peak season maximum in Table 3.2-14 of the EIR. The comment states that there are more trucks and more flights so emissions would increase. The comment states that NO_x emissions in the non-peak season are lower, so why are the other emissions for the peak season not higher. Table 3.2-14 provides a summary of the localized operational emissions. The discussion in Section 3.2 of the EIR provides a summary of how the localized emissions represent only a portion of the Proposed Project's emissions including aircraft ground support equipment and auxiliary power units. The on-site sources for the non-peak season would include area source emissions from landscaping equipment that the peak-season would not include. In addition, CalEEMod has different emission factors for summer and winter to account for seasonal variations; as such, some criteria air pollutant emissions may be higher in summer or winter. These seasonal variations and apportionment of emissions explains how certain pollutants such as CO, PM₁₀, and PM_{2.5} can be lower in the peak season. See also Appendix B-1 of the EIR.
- I-114.89 This comment questions the reference to the 2003 AQMP and asks why a more recent report was not prepared or used for the analysis. The 2003 AQMP remains relevant for CO hotspot discussions for several reasons. First, the 2003 AQMP provides a comprehensive baseline of air quality data, including CO emissions, which is essential for understanding long-term trends and evaluating the effectiveness of air quality management strategies. Because of improving technologies related to mobile source CO emissions, air quality related to CO has been improving throughout the SCAB since release of the 2003 AQMP. The 2003 AQMP is the most recent attainment demonstration for the federal CO standards,

which outlines the strategies and measures implemented to achieve and maintain these standards. The 2003 AQMP also serves as a maintenance plan for CO, ensuring that the region continues to meet federal standards and addressing any potential future issues.

- Inis comment asks about less-than-significant impacts to health risks identified for the school exposure and residential exposure scenarios and asks for the data and who prepared the analysis. The comment also asks why land uses in the flight path are not evaluated. The HRA prepared by Urban Crossroads and included as Appendix C-1 to the EIR provides the details on how the sensitive receptors, including residences and schools, were selected. The analysis was prepared consistent with SCAQMD and OEHHA guidelines for evaluating health risks. According to the SCAQMD and OEHHA guidelines, the focus is on ground-level sources of air pollution. Aircraft emissions from a flight path are dispersed and diluted at cruising altitudes. As discussed in the HRA prepared by Urban Crossroads, aircraft on runways and taxiways were modeled as line area sources, and emissions that would occur at the gates, including from auxiliary power units and ground support equipment, were modeled as volume sources. The HRA included applicable aircraft emission sources.
- I-114.91 This comment asks how "estimates" are permitted in a Draft EIR in response to the phrase "non-cancer risks were estimated." The comment asks where the data are and who prepared the estimate. The HRA prepared for the Proposed Project by Urban Crossroads (Appendix C-1 of the EIR) provides the detailed assumptions and calculations used in determining the cancer and non-cancer health risks in accordance with SCAOMD and OEHHA guidelines. The estimates provided are real calculations based on scientific assessment and data but are referred to as estimates due to inherent uncertainties associated with HRAs. The calculations in an HRA are based on established scientific methods and data. These include exposure assessments, dose-response relationships, and toxicological data, all of which are rigorously derived and validated. Despite the scientific rigor, there are inherent uncertainties in the data used. For example, variations in individual susceptibility, exposure levels, and environmental conditions can introduce uncertainties. HRAs often rely on assumptions and models to estimate potential health risks. These models simplify complex real-world scenarios, which can introduce uncertainties. For instance, assumptions about average exposure levels or the use of default values for certain parameters can affect the accuracy of the estimates. The term "estimates" acknowledges these uncertainties and variability. It indicates that while the calculations are based on the best available science, they are not exact predictions but rather informed approximations of potential health risks.
- I-114.92 This comment questions why jet fuel was not considered an odor source in evaluating Threshold AQ-4. Jet fuel storage, transport, and refueling may result in odors; however, those odors would be localized and would not impact off-site receptors. Any odors related to fuel usage would be dispersed and diluted at cruising altitudes. Threshold AQ-4 is concerned with odors that would adversely affect a substantial number of people. Any jet fuel odors would not impact a substantial number of people.
- I-114.93 This comment expresses a personal opinion regarding the text of MM-AQ-4, which requires the tenant to apply in good faith for funding to replace/retrofit their trucks, such as Carl Moyer, VIP, Prop 1B, SmartWay Finance, and other similar funds, and asks why this measure is not made a legal requirement and why the project owner is responsible for some of the requirements throughout the EIR, but the tenant requirements are started in this measure. MM-AQ-4 will be included as a condition of approval for the Proposed Project and as such is legally enforceable. Mitigation measures outline responsibilities for implementation. In the case of MM-AQ-4, the measure is tied to operational activities that would be

the responsibility of the tenant. Other mitigation measures are in the pre-operation stage, which would involve the owner. In all instances, the mitigation measures carry forward with the action and would be enforced, whether that be with the tenant or owner.

- I-114.94 This comment asks what the public benefit is to proceeding with a project that has air quality impacts that are significant and unavoidable. This comment does not raise a specific issue regarding the adequacy of the EIR's analysis. Under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts. For further discussion, please refer to Responses I-114.21 and I-114.44, above.
- I-114.95 This comment asks why the Proposed Project should proceed if there are significant and unavoidable environmental impacts and if the goals and objectives can be re-written to provide public benefits. Under CEQA, a project can still be approved even if it requires significant mitigation and has significant and unavoidable impacts. For further discussion, Response I-114.21 addresses allowing a project to proceed despite significant and unavoidable impacts. Refer to Response I-114.7 for a discussion of the formulation of project objectives.
- It is comment asks about what the definition of "cannot feasibly" and "are too high" with respect to relating likely health consequences from cumulative air quality impacts. The comment provides an opinion on what should not be included in the definition. The EIR explains why cumulative air quality impacts cannot feasibly be related to likely health consequences in an accurate or reliable manner in the following bullets after the statement. To summarize the bullets, it is currently impossible to accurately correlate project-level emissions to specific health impacts because of the way pollution is formed and how photochemical models are used. 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 the Proposed 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 health impacts on air quality.
- I-114.97 This comment asks about the definition of feasible in relation to health consequences from project-level air quality impacts. The comment is otherwise identical to Comment I-114.96. The determination of the Proposed Project's health impacts from criteria air pollutants is discussed in the bullet points preceding the statement in question from the EIR. Please refer to Response I-114.96.
- I-114.98 This comment asks where the data are to support the statement that the Proposed Project's operations would not result in excessive or wasteful vehicle trips or VMT, nor would operations cause excess or wasteful vehicle energy consumption compared to other industrial land uses. The statement regarding comparison to other industrial land uses is general in nature. Most businesses are designed to operate as efficiently as possible as inefficiencies result in less profitability. Air cargo facilities are typically designed to minimize vehicle trips and energy consumption because they consolidate shipments, use advanced logistics and tracking systems, and are in proximity to major transportation hubs. These characteristics serve to reduce operational energy use. Energy-efficient operations lead to significant cost savings in fuel and energy expenses. This is a strong incentive for industrial land uses to adopt energy-efficient practices. In addition to the analysis in Section 3.5, Energy, of the EIR, the Energy Analysis prepared by Urban Crossroads (Appendix F of the EIR) provides substantial evidence supporting the EIR's energy determinations.

- In the comment asks if energy use would be lower with the use of smaller aircraft or fewer flights and asks that this item be considered throughout the EIR with a narrative/analysis. Chapter 5 of the EIR contemplated a reasonable range of alternatives, which included consideration of smaller aircraft in the form of Alternative 4: Private Aircraft Services Alternative and reduced flight operations in the form of Alternative 3: Reduced Flight Operations. Table 5-1 in the EIR provides a comparison of the alternatives. As shown in the table, energy impacts would be reduced; however, the Proposed Project's energy impacts were less than significant. In addition, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III of this Final EIR.
- I-114.100 This comment asks why fuel use from MM-GHG-1 cannot be "qualified [sic]" (quantified) and speculates that the reason could be negative. The fossil fuel use reduction from the provision of EV chargers is not quantified for various reasons. Fossil fuel use reductions depend heavily on how the electricity used to charge EVs is generated; if the electricity comes from renewable sources, the reduction is greater. There is a lack of consistent and comprehensive data on the energy consumption patterns of EVs, and the way EVs are used can vary widely, affecting the energy consumption. In summary, estimating the fossil fuel reduction would require speculation, which leads to uncertainty in results. The GHG analysis in the EIR conservatively did not take any reductions in fuel use from implementation of MM-GHG-1.
- I-114.101 This comment asks about the effects of climate change and notes that temperatures have been at their highest for the last 4 years and asks if this higher forecast/higher effects have been considered in the EIR where climate and temperature are addressed. As discussed in Section 3.7, Greenhouse Gas Emissions, of the EIR, the increasing temperatures that have been seen in recent years and are projected to continue in future years are noted. The impacts of GHG emissions are addressed in Section 3.7 of the EIR.
- I-114.102 This comment asks about the definition of "whenever feasible" in relation to March JPA General Plan Noise/Air Quality Element Policy 6.3 and questions how the diversion of peak hour traffic can be legally required and if truck drivers will be encouraged to comply. Under CEQA, the term "feasible" is defined as being capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. MIPAA as the lead agency has discretion to determine the feasibility under this definition. MIPAA can legally require certain operational characteristics through the conditions of approval. Truck drivers would be required to comply with any operational limitations for truck arrivals/departures. Please refer to Response I-114.76, above, for a discussion of the Proposed Project's consistency with Policy 6.3.
- I-114.103 This comment asks how March JPA General Plan Noise/Air Quality Element Policy 6.4 would be implemented and how the owner and tenant would work with Caltrans to ensure roadways and freeway on-ramps that are heavily utilized by trucks are designed to safely accommodate trucks. The comment notes that I-215/I-60 are already congested most of the day and asks how much the operation of the cargo plane traffic will contribute to the significant traffic delays/congestion already being experienced, which causes increased pollution. As discussed in Table 3.10-1 of the EIR, the Proposed Project would be consistent with Policy 6.4 because truck routes within the March JPA Planning Area are designated to ensure that truck and commercial vehicle routes are adequately sized to meet the needs of such

trucks and to eliminate truck and commercial traffic within areas not suited for such vehicles. Additionally, a queuing analysis was prepared to evaluate potential impacts to off-ramps at I-215 and found that at the I-215 southbound ramps at Harley Knox, none of the queues are reported to spill back onto I-215 or add two or more car lengths to the ramp queues in the peak hours that would extend into the freeway mainline per Caltrans criteria. The Project Traffic Analysis (Appendix M-1 of the EIR) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant.

- I-114.104 This comment asks, in relation to March JPA General Plan Noise/Air Quality Element Policy 7.3, what passive solar design is and whether it is possible for the Proposed Project to install solar panels that create excess electricity that can be sent back to the grid. Passive solar design in construction refers to the strategic use of a building's site, climate, and materials to naturally collect, store, and distribute solar energy. This approach minimizes the need for mechanical heating and cooling systems, making buildings more energy efficient. Some examples of passive solar design include orientation of the building to maximize sunlight exposure, typically with windows facing within 30 degrees of true south; using materials like concrete, brick, and stone to absorb and store heat from sunlight during the day and release it at night; using proper insulation to help retain heat during the day, reducing the need for additional heating; and using natural ventilation systems to help cool the building during warmer months. As discussed in Section 3.7 of the EIR, the installation of solar panels is not feasible due to the project site's vicinity to March ARB, because solar panels would interfere with aircraft navigation. As discussed in Table 3.10-1 of the EIR, the Proposed Project would be consistent with Policy 7.3 because implementation of MM-AQ-3 would reduce heating and cooling loads through energy-efficiency strategies.
- I-114.105 This comment asks about the 14.2-mile trip length noted for medium heavy-duty trucks, how it will be enforced by the tenant/owner, and how it will be monitored for compliance with SCAQMD requirements. The Approach and Methodology section in Section 3.7 of the EIR provides an overview of how the operational emissions were modeled. The emissions estimate for mobile source emissions from trucks used trip lengths developed by SCAQMD for its Warehouse Indirect Source Rule Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program using the SCAG Heavy-Duty Truck Regional Travel Demand Model. A standard professional practice consistent with CEQA is to use a reasonable range of trip length estimates. The Proposed Project relied on the various trip lengths for different truck types to develop a weighted trip length in the analysis. Using a range of trip lengths ensures that the modeling reflects a variety of travel behaviors and patterns, providing a more accurate and comprehensive estimate of GHG emissions. This method aligns with standard practices in transportation and environmental modeling, which often use average trip lengths derived from regional travel surveys and studies. The 14.2-mile trip length noted by the comment is not a regulatory requirement, but a data point for estimating emissions from warehouse trucks based on regional data.
- I-114.106 This comment is in regard to VMT per employee. The comment asks how and by whom the data were collected. It also requests the VMT data. The VMT data were included in the technical report prepared by Urban Crossroads (Appendix M-2 of the EIR) and were discussed further in Section 3.12 of the EIR.

- I-114.107 This comment asks what the definition of favorable jobs to housing balance is and for the data to support this statement. Favorable jobs to housing balance in terms of air quality refers to a situation where the number of jobs in a region is well-matched with the number of housing units. An ideal ratio as noted by the California Department of Housing and Community Development is 1.5. A jobs to housing ratio of 1.5 indicates that there are 1.5 jobs available for every housing unit in a given area. This ratio is generally considered ideal because with more jobs available locally, residents are less likely to need long commutes, which can reduce traffic congestion and VMT. Shorter commutes contribute to lower emissions, improving air quality and reducing the environmental impact. According to the Connect SoCal 2024 Demographic Data, Riverside County has a jobs to housing ratio of 1.04 and a projected ratio of 1.02 by 2045, indicating that housing may outpace job growth slightly. As discussed in Chapter 4 of the EIR, the Proposed Project would generate approximately 150 permanent employment opportunities, well within the growth anticipated in SCAG's Connect SoCal 2024 demographic projections. The addition of new employment opportunities would help to balance jobs to housing, which would be considered favorable for air quality purposes.
- I-114.108 This comment questions the Proposed Project's consistency with the Connect SoCal RTP/SCS measure to enhance the preservation, security, and resilience of the regional transportation system and asks whether this includes local and nearby freeway systems. As discussed in Table 3.7-7 of the EIR, the Proposed Project would be consistent with this measure because it would diversify the available access points for transporting goods to and from the region, which would enhance the resilience of the regional transportation system. With regard to local and nearby freeway systems, please refer to Response I-114.103, above.
- I-114.109 This comment questions the Proposed Project's consistency with the Connect SoCal RTP/SCS measure to increase person and goods movement and travel choices within the transportation system and further asks about the definition of "improving goods movement" and who prepared the analysis for this statement. The term "improving goods movement" refers to enhancing the efficiency, speed, and reliability of transporting goods from their origin to their destination. This involves optimizing logistics, reducing transit times, and minimizing costs and environmental impacts. Building the air cargo facility at March ARP/MIP Airport would improve goods movement because it is strategically located near highways and transportation networks, facilitating easy access for trucks and reducing transit times for goods. In addition, the facility would increase the capacity for handling goods in the region, allowing for more efficient processing and distribution, which can alleviate congestion at other regional hubs and improve overall logistics efficiency. By shifting a portion of goods movement to air transport, the facility can reduce the burden on road networks, decreasing traffic congestion and associated emissions. The Proposed Project and its environmental impact analysis are the basis for supporting this statement.
- I-114.110 This comment questions the statement regarding reducing commutes to large urban centers against the previous modeling trip lengths noted for trucks on page 3.7-33 of the EIR and asks why it matters to reduce long commutes if the truck trips are more localized according to the trip length data used for trucks in the modeling. The statement regarding commute trip lengths is referring to the commute trips of employees, whereas the trip lengths noted on page 3.7-33 refer to truck distribution trips. As noted in the sentence preceding the statement regarding reduction in commute trips, development of the Proposed Project would provide new job opportunities to residents in the region, improving the jobs to housing balance, which would reduce VMT associated with employee commute trips.

- I-114.111 This comment asks about the statement regarding a more favorable jobs to housing balance that would help to reduce traffic congestion, how the Proposed Project would accomplish this goal, and where the study is to support this statement. The Proposed Project and its environmental impact analysis are the basis for supporting this statement. As noted previously, the Proposed Project would add additional local employment opportunities. The more jobs available locally, the less likely residents are to need long commutes, which can reduce traffic congestion and VMT. Shorter commutes contribute to lower emissions, improving air quality and reducing the environmental impact.
- I-114.112 This comment questions whether the determination that the Proposed Project would not impact natural habitat is accurate given the cargo flight path operations. The statement regarding the location of the Proposed Project on the March ARB and not impacting natural and agricultural lands is accurate. Natural habitats are areas that provide the necessary conditions for wildlife and plant species to thrive. These include terrestrial and aquatic ecosystems that are essential for biodiversity. CEQA requires the assessment of significant environmental impacts related to physical changes in the environment. Airspace, while important for aviation, does not constitute a physical habitat for terrestrial or aquatic species. Chapter 2 of the EIR, specifically Section 2.1, Project Location, describes the existing environment, which does not include natural habitat or agricultural lands.

In terms of overflight, Castleview Arroyo and Sycamore Canyon are respectively approximately 3.5 and 0.6 miles northwest of the 65 dBA CNEL Baseline + Peak Project aviation noise contours (i.e., the 60-65 dBA CNEL green-colored band) shown in Figure 3.11-12 of the EIR. While flights may be visible and audible under the right conditions, changes to the outdoor ambient noise level exposures (expressed as CNEL) in these off-site areas attributed to Proposed Project aviation traffic are not expected to be significant. While the impacts of noise on wildlife are highly variable depending on the species, existing urbanization of the landscape, and time of year (e.g., breeding season), it is expected that wildlife in Castleview Arroyo and Sycamore Canyon, which are both open space areas in an urbanized landscape, can tolerate up to 60 dBA hourly Leq, which is a magnitude similar to normal speech. ¹¹⁰ Given that Castleview Arroyo and Sycamore Canyon are outside of the 60 dBA CNEL Baseline + Peak Project aviation noise contour (i.e., the outer edge of the 60-65 CNEL range) by approximately 3.5 miles and 0.6 miles respectively, they would be exposed to lower aviation-attributed CNEL because sound decreases with increased distance from the noise source. Hence, the Proposed Project noise impacts would be less than 60 dBA CNEL and would not be a significant impact to wildlife species.

Initial This comment questions the statement that there are no feasible mitigation measures to reduce aircraft GHG emissions. The comment asks where the study is and who prepared the study to support this statement. The comment also suggests that the term "feasible" means that something can be done and that the Proposed Project should consider all mitigation. CEQA requires that mitigation measures be feasible. Feasibility is defined by CEQA as capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (14 CCR 15364). Prior to stating that there are no feasible mitigation measures to reduce GHG emissions, Section 3.7 of the EIR notes that although research to reduce aircraft GHG emissions is ongoing, the technologies to reduce GHG emissions have not been fully developed; as such, they are not feasible. Under CEQA there are significant challenges in implementing feasible mitigation measures to GHG emissions from aircraft for an individual air cargo facility project.

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Bowles, A.E. 1995. "Responses of Wildlife to Noise." In *Wildlife and Recreationists Coexistence Through Management and Research*, edited by Richard L. Knight and Kevin J. Gutzwiller, 109–156. Washington, DC: Island Press.

Currently, zero emission aircraft technology is not sufficiently advanced to support commercial operations. This technological limitation means that there are no viable alternatives to conventional aircraft. Additionally, MIPAA does not have regulatory authority over aircraft emissions; FAA and EPA are the regulatory agencies that have authority over aircraft emissions. The EIR did consider alternatives that included the use of smaller planes (Private Aircraft Alternative), fewer flight operations (Reduced Flight Operations Alternative, Reduced Operation/No Nighttime Flights Alternative, Reduced Aviation Noise Alternative), and reduced hours of operation (Nighttime Flight Noise Reduction Alternative, Reduced Operation/No Nighttime Flights Alternative, Reduced Aviation Noise Alternative). Given the current state of aircraft technology and the lack of control over the fleet, it is not feasible to implement effective aircraft GHG reduction measures. While direct mitigation of aircraft emissions is not feasible, facilities can implement indirect measures such as what the Proposed Project includes as MM-AQ-2 (Construction Requirements) through MM-AQ-6 and MM-GHG-1.

- I-114.114 This comment questions the statement "located approximately 0.5 miles to the east." As noted in Section 3.2.3, Thresholds of Significance, of the EIR, "The nearest land use to the project site where an individual could remain for 24 hours was used to determine localized construction and operational air quality impacts for emissions of PM₁₀ and PM_{2.5} (because PM₁₀ and PM_{2.5} thresholds are based on a 24-hour averaging time). The nearest existing residential sensitive receptor is located approximately 2,730 feet (832 meters) east of the project site." This is equivalent to 0.5 miles. The location of the nearest sensitive receptors is shown in Figure 3.11-2 in the EIR.
- I-114.115 This comment requests additional information on the Toxic Release Inventory. As noted in Section 3.8 of the EIR, the Toxic Release Inventory is maintained by the EPA under the Community Right to Know Act. As such, this inventory is a public information database. Searchable maps, lists, and other information are provided by EPA.¹¹¹
- I-114.116 This comment questions the AICUZ Study, including the age of the report (2018) and the contents regarding cargo planes. The analysis is based on the most recent available studies and data. The AICUZ Study was most recently updated in 2018, therefore this document was used. Analysis discussing noise from operation of the Proposed Project is discussed in Section 3.11 of the EIR. As detailed in Table 3.11-2, the EIR provides existing noise measurements for four locations in surrounding residential areas. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. The 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement, as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges

EPA. 2025. "Toxics Release Inventory (TRI) Program." Last updated March 20, 2025. https://www.epa.gov/toxics-release-inventory-tri-program.

as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." ¹¹²

- I-114.117 This comment asks where in the EIR the ALUCP is discussed. The ALUCP is discussed in the Local Regulations subsection of Section 3.8 of the EIR. Project consistency with the ALUCP is also analyzed in Section 3.10 of the EIR.
- **I-114.118** This comment questions the 2018 AICUZ Study, similar to Comment I-114.116. As such, please refer to Response I-114.116, above.
- I-114.119 This comment questions the term "normally acceptable" with regard to the March ARB/Inland Port ALUCP compatibility criteria. As stated in the referenced sentence, Policy MA.2.3(a) of the ALUCP, prepared by the County of Riverside, sets forth acceptable CNEL and exposures. "Normally acceptable" land use categories are where noise is a factor to be considered, in that slight interference with outdoor activities may occur but conventional construction methods will eliminate most noise intrusions upon indoor activities. Further information on these studies and policies can be found in the March ARB/Inland Port Airport ALUCP.

Finally, Table 3.8-3 in the EIR does not represent Proposed Project conditions, but rather provides a table of acceptable land uses within specific noise contour areas as defined by the ALUCP.

- I-114.120 This comment asks if aircraft fueling and transport of fuel are operational creations of hazardous material that could release hazardous fuels. Aircraft fueling and associated operational hazards are discussed in Section 3.8 of the EIR. Aircraft fueling would occur on the project site. MIPAA, the project operator, and/or the project applicant would be responsible for implementation of appropriate permits, safety programs, training, and other applicable measures for fueling and fuel storage, pursuant to FAA, EPA, and other applicable regulations. Fueling and other on-site operations would be subject to the MIPAA Airport Rules and Regulations, which include BMPs for protection of stormwater.
- **I-114.121** This comment asks how requirements will be administered when March JPA's "role is complete." MIPAA will have ongoing authority and jurisdiction over the project site and the Proposed Project.
- I-114.122 This comment asks how any spill would be considered a less-than-significant impact. As discussed in Section 3.8 of the EIR, emergency response procedures are in place for accidental fuel or hazardous material releases. Rules and regulations outlining release response procedures result in impacts being less than significant, as releases will be managed and impacts reduced such that they do not result in "significant hazard to the public or environment."
- I-114.123 This comment states houses, schools, and other residences within a 2-mile radius of the public use airport should be evaluated under Threshold HAZ-4. The purpose of Threshold HAZ-4 is to evaluate impacts due to the Proposed Project being constructed within 2 miles of the public use airport, specifically regarding noise or safety within the project area. The houses, schools, and other residences are pre-existing conditions; construction of the Proposed Project and impacts to the project area under

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DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

this threshold are not changed based on surrounding pre-existing conditions. Potential noise impacts to nearby uses and sensitive receptors, such as the residences and schools, raised by the comment, are discussed in Section 3.11 of the EIR.

- I-114.124 This comment asks about impacts associated with a proposed apartment building within the cargo plane flight path. Impacts associated with the construction/operation of that building would be addressed in the site-specific CEQA analysis for that project, including potential impacts due to proximity of an airport. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.125 This comment raises concerns about noise impacts to residential neighborhoods west of I-215 and northwest of March ARB/Inland Port Airport. As discussed in Section 3.11 of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mission Grove, Canyon Crest, Orangecrest, and Woodcrest, are outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MO-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." 113 As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

I-114.126 This comment asks if the EIR section can be updated to provide information regarding potential noise, pollutants, and fuel leaks associated with cargo flight path operations. Future aircraft flights are required to adhere to safety requirements set forth by the FAA, as well as state and local regulations specific to the airport's location. These rules and regulations are discussed in Section 3.8.2. As noted

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DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

in Section 3.11, under Threshold NOI-3, of the EIR, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, as discussed in Section 3.10 of the EIR, the Proposed Project would conforms with the existing ALUCP, which includes designated land uses within flight paths.

- I-114.127 This comment questions the applicability of the Environmental Justice Element. In response, please refer to Response I-114.77, above.
- I-114.128 This comment questions if FAA Form 7460-2 has been submitted. This form has not been submitted as it is not submitted until at least 48 hours in advance of actual construction or alteration. The comment further questions if FAA Form 7460-2 could be used to alter flight paths affecting residential properties. Similar to FAA Form 7460-1 discussed in Response I-114.68, FAA Form 7460-2 does not relate to flight paths. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.129 This comment questions where March ARB Instruction 13-204 is located. March ARB Instruction 13-204 is available on the Air Force E-Publishing website. 114 The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.130 This comment questions where CFR Part 150 is located. CFR Part 150, Airport Noise Compatibility Planning, is available on the National Archives Code of Federal Regulations website. 115 The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.131 This comment questions if the 2018 AICUZ Study was approved by the March JPA Commission. The AICUZ Study is a document produced by the DAF. MIPAA does not have any approval authority. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.132 This comment questions the cargo plane take-off parameters used in the AICUZ study. The 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.133 This comment questions whether a proposed apartment building complex in Mission Grove is subject to the airspace requirement of 14 CFR Part77. Impacts associated with the construction/operation of that building would be addressed in the site-specific CEQA analysis for that project, including potential impacts due to proximity of an airport. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

¹¹⁴ March ARB (March Air Reserve Base). 2017. "March Air Reserve Base Instruction 13-204." June 2, 2017. https://static.epublishing.af.mil/production/1/marcharb/publication/marcharbi13-204/marcharbi13-204.pdf.

Code of Federal Regulations, Part 150-Airport Noise Compatibility Planning: https://www.ecfr.gov/current/title-14/chapter-I/subchapter-I/part-150.

- I-114.134 This comment questions regional transportation planning. In addition to reviewing the RTP/SCS/Connect SoCal, a project-level transportation analysis was also conducted. The project-level transportation analysis analyzed the on- and off-ramps that would be impacted by the Proposed Project as noted in Section 3.12 of the EIR. Please see Section 3.12 for the on- and off-ramp analysis, as well as the analysis for the local roads in the vicinity of the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.135 This comment asks what CalEnviroScreen is. As noted in Section 3.10 of the EIR, CalEnviroScreen is the California Communities Environmental Health Screening Tool; "CalEnviroScreen is a mapping tool developed by the Office of Environmental Health Hazards Assessment to help identify low-income census tracts in California that are disproportionately burdened by and vulnerable to multiple sources of pollution. CalEnviroScreen uses environmental, health, and socioeconomic information based on data sets available from federal and state government sources to produce scores for every census tract in the state." For further details, refer to the OEHHA CalEnviroScreen website. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.136 This comment asks what "Community Preferred" means. As discussed in Section 3.10 of the EIR, the March Air Force Base Master Reuse Plan was prepared by March JPA. The goal of the Master Reuse Plan is to facilitate economic recovery resulting from base realignment. "Community Preferred" is part of the first phase of the Master Reuse Plan, which focused on land use patterns that reflected the ultimate reuse goals of neighboring communities. For further details, refer to the March Air Force Base Master Reuse Plan. 117 The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.137 This comment requests further details regarding the zoning designation of the project site. As noted in Section 2.1 of the EIR, the March JPA General Plan designates the parcels surrounding the project site as Aviation (AV) and Industrial (IND). As shown in Figure 2-2 of the EIR, the land use designation of most of the project site is Aviation (AV). The project site has not been assigned a zoning designation per the official March JPA Zoning Map, as shown in Figure 2-3 of the EIR. The Off-Site Component within March ARB is designated as "March Air Reserve Base" on both the March JPA General Plan and zoning maps. Therefore, to be consistent with the current March JPA General Plan land use designation of Aviation (AV), the Proposed Project is requesting a zoning designation of Aviation (A) for the approximately 34-acre Air Cargo Center Component. The March Joint Powers Commission will consider rezoning to the A zoning designation as part of the entitlements sought by the Proposed Project.
- I-114.138 This comment requests details regarding job opportunities from the Proposed Project in relation to March JPA General Plan Land Use Element Policy 1.1. As discussed in Table 3.10-1 of the EIR, the Proposed Project would be consistent with Policy 1.1 because it would include a cargo building to increase capacity for air cargo services at the MIP Airport, consistent with the existing General Plan land use designation. The March JPA General Plan and the associated land use plan were developed as local land use implementation tools of the March AFB Master Reuse Plan. As such, Proposed Project

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¹¹⁶ OEHHA (Office of Environmental Health Hazard Assessment). 2023. "CalEnviroScreen 4.0." https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40.

¹¹⁷ March JPA (Joint Powers Authority). 1996. *Land Use Plan: March Air Force Base Master Reuse Plan*. Last revised October 2, 1996. Moreno Valley, California: March JPA.

development would assist with implementation of the Master Reuse Plan. In addition, the proposed development would create new job opportunities and economic benefits within the March JPA Planning Area. Regarding job opportunities, please refer to Response I-114.17, above.

- I-114.139 This comment questions how March JPA General Plan Land Use Element Policy 1.2 addresses "concerns, impacts, lower home values affecting local residents." The significance criteria used to evaluate the Proposed Project's impacts are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and, as applicable, the March JPA CEQA Guidelines, neither of which require that impacts to property values be analyzed. As discussed in Section 3.10 of the EIR, with approval of the proposed Aviation (A) Zoning Designation, the Proposed Project would be consistent with the General Plan land use designation and zoning district. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.140 This comment questions how March JPA General Plan Land Use Element Policy 1.3 and the EIR address freeway and local road wear and tear concerns. As discussed in Table 3.10-1 of the EIR, the Proposed Project would be consistent with Policy 1.3 because it would be constructed near the southern terminus of an existing roadway (Heacock St.), which is currently developed on the east side with industrial warehouse buildings and on the west side as the March ARB and an existing distribution warehouse. A new signalized intersection on Heacock St. at the existing access roadway would be installed. Public services such as fire and police protection, which are provided to the adjacent industrial development to the south, would serve the project site and, as part of standard development practices, Proposed Project plans would be reviewed by the appropriate public agencies and services to ensure adequate facility capacity. Regarding wear and tear concerns, please refer to Response I-114.19, above.
- I-114.141 This comment questions how March JPA General Plan Land Use Element Policy 1.9, related to the AICUZ, and the EIR considered take-off/flight plans in the studies for noise level contours and the impact to local residences. As discussed in Section 3.11 of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods west of I-215 would be outside the 60 dBA contour line. The 2018 March ARB AICUZ noise contours map, Figure 3.11-4 of the EIR, does show the 60 dBA contour line curving west over the identified neighborhoods. However, the 2018 AICUZ noise contours were developed assuming a noisier aircraft mix and full utilization of the allowed civilian flight operations (21,000 flight operations identified in the Joint Use Agreement), as well as 31,172 additional annual flight operations from an assortment of military and other aircraft that include the following: C-17 (14,078), F-15E (1,216), KC-135R (5,810), MQ-9 (2,272), PC12 (602), AS350 (300), Cessna 172 (2,994), Cessna 182 (996), and Transient (2,904). The baseline noise contours shown in Figure 3.11-3 of the EIR are based on the KC-46A EIS Figure 3-1 noise contours, which the KC-46A EIS acknowledges as being different from the 2018 AICUZ noise contours (EIR Figure 3.11-4) due to "reflecting a smaller number of C-17 operations" and "a much smaller number of civilian aircraft operations." 118 As shown

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

DAF (U.S. Department of the Air Force). 2024. KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (EIS). Revised Draft. DAF, Air Force Civil Engineer Center, Air Force Reserve Command. June 2023. https://www.kc-46a-mob5.com/content/documents/163215_KC-46A%20MOB%205%20Volume%20I%20Revised%20Draft%20EIS% 20Chapters%201-6.pdf.

in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods west of I-215.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-114.142 This comment questions the Proposed Project's consistency with March JPA General Plan Land Use Element Goal 2 and what improvements are being proposed to reduce traffic congestion, noise, and pollution. As discussed in Table 3.10-1 of the EIR, the Proposed Project would be consistent with Goal 2 because it would include development of a gateway air cargo center that could utilize existing infrastructure at the MIP Airport within the March ARB. The project site is within an area primarily developed with industrial and business park land uses and is close to I-215, a regional transportation facility. As such, the Proposed Project would be similar in character to existing nearby development, with the ability to utilize the existing transportation infrastructure to transport goods to and from the site. With regard to road improvement, please refer to Response I-114.19, above. As noted in Section 3.11 of the EIR, MM-NOI-1 and MM-NOI-2 would be implemented to reduce noise impacts. The Proposed Project's impacts noise impacts from operational traffic were found to be less than significant. As noted in Section 3.2 of the EIR, MM-AQ-1 (Construction Management Plan) through MM-AQ-6 would be implemented to reduce impacts to air quality.
- I-114.143 This comment questions why the March JPA General Plan Land Use Element Policy 2.1 avoidance measure for reduced hours of operation was not discussed in the EIR. Alternatives 2, 3, 5 and 5 incorporate reduced flight operations. Alternative 2 eliminates nighttime flights, between 10:00 p.m. and 11:00 p.m. Alternative 3 reduces annual flights by 10%. Alternative 5 reduces Proposed Project operations 10% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). The alternatives are further discussed in Chapter 5 of the EIR. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-114.144 This comment questions what the impacts would be to the needs of the air cargo industry if the Proposed Project was not approved. In response, please refer to Appendix Q of this Final EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-114.145 This comment questions the Proposed Project's consistency with March JPA General Plan Land Use Element Policy 2.4 and how the interests of "adjacent residents" are being protected, especially those that are in the flight path. As discussed in Table 3.10-1 of the EIR, the Proposed Project would be consistent with Policy 2.4 because there are no residential developments immediately adjacent to the project site. The nearest residence is 0.5 miles east of the project site. The project site is bounded by

the March ARB to the north and west and a cargo storage and distribution facility to the south. Heacock St. runs north–south adjacent to the eastern project site boundary. The Proposed Project, including the architectural renderings, would undergo staff review with MIPAA to ensure that the massing, height, siting, and design of the proposed cargo building, on-site circulation, and landscaping comply with the March JPA Development Code and building and construction code and are compatible with the surrounding area. As such, the Proposed Project would be consistent with the General Plan land use designation and the applicable Development Code standards for the proposed zoning district. The flight paths of planes are coordinated through a process that involves several key factors and stakeholders such as Air Traffic Control, flight dispatch planning, weather conditions, airspace restrictions, aircraft performance, and environmental and noise considerations. This careful coordination of flight paths is done to ensure efficiency and safety. The interests of area residents are being protected through the safe and efficient use of the MIP Airport.

- I-114.146 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 3.1, specifically in relation to public access roads and freeways. Regarding Proposed Project impacts to roads and freeway infrastructure, please refer to Response I-114.19, above.
- I-114.147 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 3.2, and expansion of infrastructure. As discussed in Chapter 2 of the EIR, on-site trenching and construction of new utility lines would occur that would connect with existing water, wastewater, storm drain, natural gas, and electrical facilities surrounding the project site, as shown on Figures 2-7a and 2-7b and Figure 2-8 of the EIR. An on-site storm drain network would be constructed with approximately 91,300 cubic feet of underground detention basins to provide storage for required stormwater runoff treatment prior to discharge to the backbone storm drain system at an allowable discharge rate. Utility improvements associated with the Proposed Project would be limited to on-site improvements to connect to existing infrastructure. No upsizing of facilities would be required to serve the Proposed Project.
- I-114.148 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 3.3 and asks why the Proposed Project cannot guarantee implementation of programs and infrastructure improvements. As discussed in Table 3.10-1 of the EIR, the Proposed Project will pay all necessary development and fair-share fees (PDF-TRA-1), including March JPA development impact fees. The Proposed Project's contribution to infrastructure improvements would not cover the full amount of the improvements, but rather the percentage of the improvement that is attributable to the Proposed Project. It is the responsibility of the agencies receiving these funds to implement the programs and infrastructure improvements. The comment further questions if there would be compensation to homeowners in the take-off/flight path due to "housing impacts." To the extent this comment is referring to property values, CEQA does not require that impacts to property values be analyzed. To the extent this comment is referring to noise impacts, please refer to Response I-114,33, above.
- I-114.149 This comment questions the consistency of the Proposed Project with March JPA General Plan Land
 Use Element Policy 3.4 and how the actual cost of public services is calculated. As discussed in Table
 3.10-1 of the EIR, the Proposed Project will pay all necessary development and fair-share fees (PDF-TRA-1), including March JPA development impact fees. The calculations are provided in Table 1-5 of

the Traffic Analysis (Appendix M-1 of the EIR). The Proposed Project will also pay all connection fees and usage fees as set by each public service provider.

- I-114.150 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 4.7 and asks how the Proposed Project will develop the industry of the region. As discussed in Table 3.10-1 of the EIR, the Proposed Project would create new permanent jobs and help serve the goods movement needs of the region. For more information as to the need for additional air cargo services, please refer to Appendix Q of this Final EIR.
- I-114.151 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 4.7 as to "the goods movement needs of the region" and data to support this assertion. For more information as to the need for additional air cargo services, please refer to Appendix Q of this Final EIR.
- I-114.152 This comment questions how March JPA General Plan Land Use Element Goal 5 satisfies property owners in the flight path. This comment is unrelated to the Proposed Project and the environmental analysis of the EIR.
- **I-114.153** This comment questions if the EIR considers the Proposed Project's impacts to home values. CEQA does not require that impacts to property values be analyzed.
- I-114.154 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 5.6 and asks how the Proposed Project will encourage local hiring. According to the applicant, the Proposed Project will have a project labor agreement with local unions. The comment further questions the EIR's conclusion that the new jobs would likely be filled by the existing residential population in the greater Riverside County area. As discussed in Table 3.10-1 of the EIR, development of the Proposed Project would introduce a new employment-generating land use in a portion of the County with above-average unemployment. As discussed in Chapter 4 of the EIR, the estimated employee count for the Proposed Project (150) would be less than 1% of the total employment in SCAG's Growth Forecast under the adopted 2020–2045 RTP/SCS. This increase in employment would be minimal in comparison to the anticipated increase of SCAG's Growth Forecast.
- Initial Initia

OEHHA and CalEPA. 2025. "CalEnviroScreen 4.0 Indicator Maps." https://experience.arcgis.com/experience/ed5953d89038431dbf4f22ab9abfe40d/page/Indicators/?views=Unemployment#data_s=id%3Awidget_328_output_0%3A0. Per CalEnviroScreen 4.0, census tracts surrounding March ARB have an average unemployment rate of 9% (ranging from 3% to 17%).

comments received are responded to in this Final EIR. Other planning documents involving the economic use, reuse, and joint use of March ARB/Inland Port Airport, such as the March AFB Final Reuse Plan and March JPA General Plan, had similar public comment periods prior to their adoption.

- I-114.156 This comment alleges the consistency analysis of the Proposed Project with March JPA General Plan Land Use Element Policy 6.4 does not address the long term needs of the Air Force Reserve in terms of encroachment, noise, accident zone, constraints, and other needs. The March ARB/Inland Port Airport ALUCP addresses compatibility between 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. On March 13, 2025, the Riverside ALUC determined the Proposed Project was consistent with the ALUCP, subject to certain conditions. See Section 3.10 of the EIR for the analysis of the Proposed Project's consistency with the provisions of the ALUCP.
- I-114.157 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 6.8 and the height restrictions under Part 77 conical surface criteria and whether the K-Mart apartments were included in the analysis. Part 77 requires the submittal of FAA Form 7460-1 when a project proposes any construction or alteration to an airport operated by a federal agency or the Department of Defense. With regard to the Proposed Project, the building height restrictions apply to the cargo building in relation to March ARB/Inland Port Airport operations, not the Proposed Project's flights in relation to other buildings. Impacts associated with the construction/operation of the K-Mart apartments would be addressed in the site-specific CEQA analysis for that project, including potential impacts due to proximity of an airport.
- I-114.158 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Goal 7 and the EIR's determination that the Proposed Project would alleviate congestion within the greater region. For information as to the need for additional air cargo services regionally, please refer to Appendix Q of this Final EIR.
- I-114.159 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 7.3 and asks if freeways and roadways were considered. For information as to the need for additional air cargo services regionally, please refer to Appendix Q of this Final EIR.
- I-114.160 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 7.5 and questions why commercial passenger services were not analyzed. For a discussion of commercial passenger services, please refer to Response I-114.12, above. The Proposed Project involves air cargo flights and does not propose commercial passenger service flights.
- I-114.161 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 7.7 and questions why only cargo flights are considered. As discussed in Response I-114.12, above, the March Inland Port Airport does not have the FAA certification for commercial passenger services and the Proposed Project proposes air cargo flights. Chapter 5 of the EIR analyzes Alternative 4, Private Aircraft Services Alternative. The comment further questions the existing airport users and existing daily flights. As discussed in the March Inland Port Airport Master Plan Update, Table 2.3, existing airport tenants include Million Air, Atlas Air, ABX Cargo, and ATI Cargo. As shown in

Table 3.11-3 of the EIR, there were 4,972 civilian flight operations and 22,626 military flight operations in 2022. For clarification of terminology, a "flight" is composed of two flight operations: a take-off and a landing. Therefore, 2022 averaged 7 civilian flights and 31 military flights a day.

- I-114.162 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Goal 10, what constitutes infrastructure, and whether it would include freeways and existing roads. Infrastructure would include utilities, such as water, sewer, stormwater, gas, electric, and telephone. Section 3.14 of the EIR analyzed the Proposed Project's impacts to these systems and determined the impacts would be less than significant. Infrastructure could also include government facilities and public services. As discussed in Chapter 4 of the EIR, the Proposed Project would have a less-than-significant impact on fire services, police services, schools, parks, and other public facilities. For a discussion of the Proposed Project impacts on freeways and roads, please refer to Response I-114.19, above.
- I-114.163 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 10.1 and why use of the Proposed Project's fees cannot be guaranteed to be used to implement programs and street system improvements. As discussed in Response I-114.148, above, it is the responsibility of the agencies receiving these funds to implement the programs and infrastructure improvements. For more information regarding the potential for future road improvements and repairs, please refer to Response I-114.19, above.
- I-114.164 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policy 10.3 and whether available capacity includes freeways and local roads and wear and tear. Regarding the future road improvements and repairs, please refer to Response I-114.19, above.
- I-114.165 This comment questions the consistency of the Proposed Project with March JPA General Plan Land Use Element Policies 12.2 and 12.3, what constitutes infrastructure, and whether it would include freeways and existing roads. Regarding utility and public service infrastructure, please refer to Response I-114-162, above. For a discussion of the Proposed Project impacts on freeways and roads, please refer to Response I-114.19, above.
- I-114.166 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Goal 2 and alleges the analysis omits compliance with transportation needs. Goal 2 is a broader March JPA goal to plan for the overall transportation system. As discussed in Table 3.10-1 of the EIR, the Proposed Project provides the necessary internal circulation improvements, expansion of the existing southern access roadway, and the signalized intersection on Heacock. MM-TRA-1 and MM-TRA-2 provide mitigation for the Proposed Project's construction and operational transportation impacts. The Proposed Project addresses its needs for the transportation system and does not impede achievement of the overarching goal for the transportation system. For a discussion of the Proposed Project impacts on freeways and roads, please refer to Response I-114.19, above.
- I-114.167 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Policy 2.1 and transportation needs and alleges the analysis does not adequately address the goal. Policy 2.1 directs March JPA to balance the need for free flow of traffic

with economic realities and environmental and aesthetic consideration. For a discussion of traffic effects of the Proposed Project, please refer to Response I-114.51, above.

- I-114.168 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Goals 3 and 4 and Policies 2.7 and 3.5, what constitutes "on-street parking," and whether the Proposed Project would include on street parking around the project site (Heacock Street and neighborhoods). On-street parking is parking along streets and roadways. As discussed in Table 3.10-1 of the EIR, the March JPA Development Code requires a specific amount of on-site parking depending on the land use to discourage off-site parking on adjacent streets. The Proposed Project provides sufficient on-site parking to serve the cargo building and prevent spillover onto the adjacent street system. Parking is not allowed along the Proposed Project's truck route (Heacock Street, Nandina Avenue, Indian Avenue, Harley Knox Boulevard).
- I-114.169 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Policy 4.3 and why the Proposed Project's circulation improvements would be limited to on the project site. For a discussion of the Proposed Project's contributions to the transportation system, please refer to Response I-114.166, above. The comment further questions how arterial roads and freeway exit/entrance locations on I-215/I-60 are addressed. For a discussion of the Proposed Project impacts on freeways and roads, please refer to Response I-114.19, above. For a discussion of traffic effects of the Proposed Project, please refer to Response I-114.51, above.
- I-114.170 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Policy 4.4 and how the transportation analysis handles anticipated future transportation system improvements. As noted in Section 3.12.9 of the EIR, the Traffic Analysis (Appendix M-1 of the EIR) provided a detailed analysis of operational characteristics for the 20 intersections and 8 roadway segments in the study area for the following scenarios: Existing (2020) Conditions, Existing plus Project, Opening Year Cumulative (2026), Opening Year Cumulative (2026) with Project, Horizon Year (2045) Conditions, and Horizon Year (2045) with Project. Development of the Proposed Project is not anticipated to require the construction of any off-site improvements; however, there are improvement needs identified at off-site intersections for future traffic analysis scenarios where the Proposed Project would contribute traffic (as measured by 50 or more peak-hour trips). The Proposed Project's contributions toward off-site intersection deficiencies would be fulfilled through payment of its fair share or participation in the pre-existing fee programs that would be assigned to construction of the identified recommended improvements (see EIR Appendix M-1, Chapter 8, Local and Regional Funding Mechanisms). Please refer to the Traffic Analysis (EIR Appendix M-1) for specific details.
- I-114.171 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Policy 4.5 and alleges the analysis omits discussion of arterial roadways. As discussed in Table 3.10-1 of the EIR, the Proposed Project includes more than the signal light mentioned in the comment. Construction and development activities within the public right-of-way along Heacock Street, an arterial road within the City of Moreno Valley, would include construction of a 225-foot-long right-turn pocket into the existing access roadway along the southbound side of Heacock Street and installation of a traffic signal at the existing access roadway. The proposed work within Heacock Street is shown on Figure 2-5 of the EIR.

- I-114.172 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Policy 6.1. As discussed in Table 3.10-1 of the EIR, access to the project site would be from the existing access roadway south of the project site, which already intersects with Heacock Street, an arterial street. The Proposed Project would not create a new access point onto Heacock Street. For a discussion of the Proposed Project's improvements on Heacock Street, please refer to Response I-114.171, above. The Proposed Project would be consistent with Policy 6.1.
- I-114.173 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Policy 6.2 and limiting access on arterial roads. Access to the project site would be from the existing access roadway south of the project site, which already intersects with Heacock Street, an arterial street. The Proposed Project would not create a new access point onto Heacock Street.
- I-114.174 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Goal 9 with regard to measures to reduce VMT during peak travel periods. Please refer to Response I-114.30, above, for a discussion of MM-AQ-5.
- I-114.175 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Goal 9 with regard to "reduced commutes/new jobs." Please refer to Response I-114.30, above, for a discussion of MM-AQ-5.
- I-114.176 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Goal 10 and enforcing truck routes. MM-TRA-2 requires all leasing agreements mandate that all Proposed Project truck traffic utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. The intersection improvements at Heacock Street shall include installed signage directing trucks to the Harley Knox Boulevard interchange.
- I-114.177 This comment questions the consistency of the Proposed Project with March JPA General Plan Transportation Element Policy 10.1 and enforcing truck routes. Please refer to Response I-114.176, above.
- I-114.178 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Goals 1 and 2 and Policies 1.1, 1.2, 2.2, and 2.4 in relation to flight path issues over Mission Grove, Orangecrest, Wood Crest, and Sycamore Canyon neighborhoods. With regard to noise impacts to neighborhoods west of I-215, please refer to Response I-114.125, above. With regard to localized air quality impacts, please refer to Response I-114.87, above. With regard to sleep disturbance, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. Further, Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For additional discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR. With regard to property values, CEQA does not require that impacts to property values be analyzed.

- I-114.179 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Goal 3 and noise from vehicular traffic. As discussed in Section 3.11 of the EIR, Threshold NOI-1 analyzes the Proposed Project's off-site vehicular traffic noise for 12 scenarios (see EIR Tables 3.11-35 through 3.11-46) and the Proposed Project's traffic noise increases (see EIR Tables 3.11-47 through 3.11-53). In all scenarios, the Proposed Project's traffic noise impacts would be less than significant. The comment further alleges the EIR does not address flyover nuisances to the neighborhood. With regard to noise impacts to neighborhoods west of I-215, please refer to Response I-114.125, above. With regard to noise impacts to the neighborhood in the vicinity of the southwest portion of the Markham Street and Brennan Avenue intersection, please refer to Response I-114.33, above.
- I-114.180 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 3.1 and alleges the analysis does not address arterial roadways or operations. Policy 3.1 addresses measures to limit noise impacts to development from arterial roadways, not vice versa. As discussed in Table 3.10-1 of the EIR, MM-NOI-1 ensures all occupants within the cargo building would not be exposed to excessive noise levels from the noise generating operation of the March ARB/Inland Port Airport. The Proposed Project would be consistent with Policy 3.1. With regard to the Proposed Project's traffic noise impacts, please refer to Response I-114.179, above. As discussed in Section 3.11 of the EIR, the Proposed Project's on-site operational noise impacts would be less than significant. With regard to aircraft noise, please refer to Response I-114.33, above.
- I-114.181 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 3.3 and the use of newer and quieter aircraft. MIPAA does not have the authority to mandate aircraft types. The AICUZ study referenced in Policy 3.3 developed noise contours assuming a noisier aircraft mix and full utilization of the civilian flight operations (21,000 flight operations) identified in the Joint Use Agreement. Because there is no proposed tenant at this time, the proposed flight operations scenarios analyzed in the EIR reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. Existing aircraft noise contours (EIR Figure 3.11-11 and 3.11-12) are significantly reduced compared to the AICUZ noise contours (EIR Figure 3.11-4). A future tenant may have an aircraft fleet quieter than the Boeing 767-300. MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval.
- I-114.182 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policies 3.4 and 3.5 and questions what mitigation measures identify compliance. Similar to Policy 3.1 discussed in Response I-114.180, above, Policies 3.4 and 3.5 address measures to limit noise impacts to development from arterial roadways, not vice versa.

 MM-NOI-1 ensures all occupants within the cargo building would not be exposed to excessive noise levels from the noise generating operation of the March ARB/Inland Port Airport.
- I-114.183 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 3.6 with regard to regulation of truck use of local streets and enforcement. Section 3.12 of the EIR and the Traffic Analysis (Appendix M-1 of the EIR) discuss federal, state, and local laws, regulations, and policies affecting trucks. MM-TRA-2 requires all leasing

agreements mandate that all Proposed Project truck traffic utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site (Heacock Street, Nandina Avenue, Indian Avenue, Harley Knox Boulevard). These roads have been designated truck routes by March JPA and the City of Moreno Valley. The intersection improvements at Heacock Street shall include installed signage directing trucks to the Harley Knox Boulevard interchange. Compliance with the mitigation measures through the MMRP and other parameters posed in the EIR will be a condition of approval with which the Proposed Project must comply. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR.

- I-114.184 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 3.7 with regard to compliance with designated truck routes and enforcement. In response, please refer to Response I-114.183, above. The comment also references truck traffic during prime morning and evening times. Please refer to Response I-114.51, above, for a discussion of traffic congestion and delay.
- I-114.185 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 3.9 and Goal 2 with regard to minimizing dependence and reducing emissions and alleges the only identified methods of new jobs and reserved parking are passive. The goal of Policy 3.9 is to minimize the level of noise generated by surface transportation. As discussed in Table 3.10-1 of the EIR, MM-AQ-2 requires the annual provision of information to employees and truck drivers about EV charging availability and alternate transportation opportunities for commuting. MM-AQ-5 requires any tenant agreement to include 5% reserved parking spaces for carpools and vanpools, provide short- and long-term bicycling parking facilities and end-of-trip facilities, provide onsite food vending or kitchen equipment and mail facilities, and establish a rideshare program with financial incentives.
- I-114.186 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Goal 2 and questions what housing balance will reduce VMT. Goal 2 specifically aims to reduce VMT and associated emissions by enhancing the jobs to housing balance (i.e., creating new jobs that can be filled by local residents). For an explanation of a favorable jobs to housing balance, please refer to Response I-114.107, above.
- I-114.187 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Goal 3 and asks who prepared the study supporting the analysis. The VMT Study was prepared by Urban Crossroads and is Appendix M-2 to this EIR.
- I-114.188 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Goal 3 and asks who accepted the study. The VMT Study (EIR Appendix M-2) and \ its assumptions, evaluations, and conclusions have been independently reviewed by third party experts and have been determined to be adequate and accurate in all respects.
- I-114.189 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 5.5 with respect to appropriate measures and their enforcement. As discussed in Table 3.10-1 of the EIR, the Proposed Project would implement MM-AQ-1 through MM-AQ-6. Compliance with the mitigation measures through the MMRP and other parameters posed in the EIR will be a condition of approval with which the Proposed Project must comply. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR.

- I-114.190 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Goal 6 and asks about enforcement of the identified mitigation measures. Compliance with the mitigation measures through the MMRP and other parameters posed in the EIR will be a condition of approval with which the Proposed Project must comply. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR.
- I-114.191 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 6.3 and alleges the analysis does not address off-peak periods. The measures identified in MM-AQ-3 will encourage diversion of peak hour traffic to off-peak periods. The comment further questions enforcement of mitigation. Compliance with the mitigation measures through the MMRP and other parameters posed in the EIR will be a condition of approval with which the Proposed Project must comply. MIPAA will monitor compliance through the MMRP. Please see Chapter IV of this Final EIR. The comment also asks why the "Empty Miles" program is not made a mandatory tenant requirement. The Empty Miles program matches a company's trailers that are returning empty with potential loads that can be collected and delivered along the return route. As described in Chapter 2 of the EIR, Proposed Project operations would involve air freight cargo, upon arrival, being transferred from the planes to the cargo building, where the air cargo would be placed onto trucks and conveyed to distribution centers; this process would also occur in reverse, from a distribution center to the cargo building. Under operational conditions, trucks accessing the project site are not likely to be empty.
- I-114.192 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 6.4, asks who prepared/approved the queuing analysis, and alleges the analysis may be out of date because traffic has gotten worse. The Traffic Analysis (Appendix M-1 of the EIR) was prepared by Urban Crossroads in July 2023. The queuing analysis evaluated the Proposed Project impacts in 12 scenarios, including existing, opening year (2026), and horizon year (2045), to account for and address traffic growth. The Traffic Analysis and its assumptions, evaluations, and conclusions have been independently reviewed by third party experts and have been determined to be adequate and accurate in all respects. The comment questions if the analysis provides sufficient data to support the statement "two or more car lengths." The supporting data for the queuing analysis is provided in the appendices to the Traffic Analysis (Appendices 3.3, 5.5, 5.6, 6.7, 6.8, 6.9, 7.11, 7.12, 7.13, 7.14, 7.15, and 7.16). The comments requests the Caltrans criteria. Subsection 3.12.4 in the EIR outlines Caltrans' facilities impact threshold. The comment alleges only the southbound ramps were studied; however, the analysis provided in Section 3.12 of the EIR includes both northbound and southbound ramps (EIR Tables 3.12-4 and 3.12-5).
- I-114.193 This comment questions the consistency of the Proposed Project with March JPA General Plan Noise/Air Quality Element Policy 7.3 with regard to energy efficiency strategies. As discussed in Table 3.10-1 of the EIR, the Proposed Project would implement MM-AQ-3, which includes a list of energy efficient strategies. Please see Chapter IV of this Final EIR for a list of the energy efficiency strategies embedded in MM-AQ-3. The comment further questions if solar design is included. For a discussion of solar design and solar panels, please refer to Response I-114.104, above.
- I-114.194 This comment questions the consistency of the Proposed Project with March JPA General Plan Resource Management Element Goal 1 in relation to conserving imported water from WMWD. The comment also asks how WMWD would adjust to water supply issues associated with climate change, including a state-encouraged, statewide 20% water reduction. The comment questions how WMWD

would conserve surface water and groundwater resources for the Proposed Project and district-wide. With respect to water conservation, as indicated in Section 3.14 of the EIR, Threshold UTL-2, the Proposed Project would be required to comply with all applicable water conservation measures, including the requirements of CALGreen and March JPA's Water Efficient Landscape Ordinance. Water conservation measures mandated by CALGreen are summarized in EIR Section 3.14.2, Relevant Plans, Policies, and Ordinances. These measures include mandatory reduction in outdoor water use through compliance with the California Department of Water Resources' Model Water Efficient Landscape Ordinance. March JPA's Water Efficient Landscape Ordinance is consistent with the Department of Water Resources' model. As discussed in Threshold UTL-2 in the EIR, the water supply needs of the Proposed Project have been incorporated into the water supply planning evaluations of the WMWD and Metropolitan 2020 UWMPs. Both the WMWD UWMP and the Metropolitan UWMP indicate that sufficient water supplies are available to meet expected demand for customers and member agencies from 2020 through 2045 under normal, single-dry-year, and multiple-dry-year conditions. In addition, WMWD has provided a will-serve letter clarifying that WMWD has sufficient capacity to supply water for the Proposed Project (Appendix N-4 of the EIR). UWMPs evaluate the reliability of water supplies within the specified service area. This includes a water supply reliability assessment, water shortage contingency plan, and development of a plan in case of an interruption of water supplies. Subsection 3.14.2 of the EIR summarizes how the Metropolitan and WMWD UWMPs demonstrate sufficient water supplies for each district, including drought years. In addition, each of the UWMPs address climate change related impacts to water supplies. With regard to the statewide 20% water reduction, the comment may be referring to the Making Conservation a California Way of Life Regulation. 120 As an urban retail water supplier, WMWD will be held to urban water use objectives. WMWD is currently compliant with its urban water use objective.121 Additionally, the Proposed Project will implement MM-AQ-3, which includes specific measures for water reduction, including LEED Silver certification, waterless urinals and high efficiency toilets, and water-efficient faucets.

State Water Resources Control Board. 2025. "Making Conservation a California Way of Life Regulation." Last updated January 7, 2025. https://www.waterboards.ca.gov/conservation/regs/water_efficiency_legislation.html.

Western Municipal Water District. 2025. "Making Conservation a California Way of Life Reporting Update." Accessed April 2025. https://wmwd.primegov.com/viewer/preview?id=3460&type=2.

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Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Kerry Hanson < khcorps@yahoo.com>

Sun 7/21/2024 9:31 PM

To:Jeffrey Smith <smith@marchipa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

I-115.1

As a scientist, I'm embarrassed for the people you hired to make this draft EIR. It is full of typos and missing data points. I wouldn't give a passing grade to a student if they turned in this report in one of my classes.

I-115.2

Consider:

- 1) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

1-115.3

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I am extremely frustrated that March JPA is once again trying to dupe the hard-working, tax-paying residents of Mission Grove. It is beyond outrageous that the JPA is trying to expand its Cargo Flight operations so a few may make some money while the rest of us suffer from air craft noise, pollution, and your agency's disregard for how this project will economically destroy areas under the flight paths, which your EIR did not address. Your agency tried this in the early 2000s and it was an utter disaster. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects.

I-115.4

Just please stop trying to ruin the lives of Mission Grove residents with this constant assault on our neighborhood based on an entirely incomplete and inaccurate EIR.

Sincerley, Kerry Hanson 238 Gracefield Way Riverside, CA 92506

Kerry Hanson July 21, 2024

- **I-115.1** This comment is the first paragraph of Form Letter A. As such, please see Form Letter A Response.
- I-115.2 This comment generally claims the EIR is "full of typos and missing data points" but does not identify any specific concerns.
- **I-115.3** This comment is paragraphs 3–5 of Form Letter A. As such, please see Form Letter A Response.
- **I-115.4** This comment provides general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Greg Renne <gregrenne@hotmail.com>

Sun 7/21/2024 6:24 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.

2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-116.1

3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Greg Renne 92508

Greg Renne July 21, 2024

I-116.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

John N.(Nick)Chizo <jnchizo@aol.com> Sun 7/21/2024 11:18 AM ToJeffrey Smith <smith@marchjpa.com> smith@marchjpa.com

Dear Mr. Smith.

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, John N. Chizo 92567

Thank you, Have A Great Day John N. (Nick) Chizo 847-302-0540 951-878-7221 1-117.1

John N. Chizo July 21, 2024

I-117.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Jonathan Peaslee <jpeaslee24@gmail.com>

Sun 7/21/2024 3:49 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-118.1

- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Jonathan Peaslee 92508

Jonathan Peaslee July 21, 2024

I-118.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Mark Jessen <mclnjessen@gmail.com>

Sun 7/21/2024 9:43 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.

I-119.1

- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) We already live with the noise and pollution that comes from the Air Force planes and while this has negative health effects we understand that the base was here first and our country has a need for a strong defense. However, it is wrong to add to the noise and pollution with 17-22 cargo flights per day. Between all of the warehouses, truck traffic, and cargo flights you guys really are trying to ruin what is a nice neighborhood.

I-119.2

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

I-119.3

Thank you.

Sincerely,

<name>

Mark Jessen July 21, 2024

- I-119.1 This comment is paragraphs 1–5 of Form Letter A. As such, please see Form Letter A Response.
- I-119.2 This comment raises general concerns regarding air quality and noise from existing military operations and opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Air quality and noise impacts are addressed in Section 3.2, Air Quality, and Section 3.11, Noise, of the EIR.
- I-119.3 This comment is the last paragraph of Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Mark Lien <marklien7@gmail.com>

Sun 7/21/2024 7:45 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Please, residents do not want any more fuel exhaust sprayed to them over their head. It is like we are the crops and the planes are spitting pesticides over us, not to mention the noise from some of these planes is loud several times a day, scaring children and pets, and shaking the whole house sometimes. This area is getting more crowded with citizens. It is time for the base to wind down and move Eastward.

I-120.2

1-120.1

Thank you.

Sincerely, Mark Lien 92508

Mark Lien July 21, 2024

- **I-120.1** This comment is Form Letter A. As such, please see Form Letter A Response.
- I-120.2 This comment raises general concerns regarding the noise and air quality impacts of existing military and civilian aircraft operations. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Impacts to noise are addressed in Section 3.11, Noise, of the EIR. Impacts to air quality are addressed in Section 3.2, Air Quality, of the EIR.

March JPA-Meridian Air Cargo Project-DEIR Impact Comments-Letter by July 22, 2024

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.	I-121.1
1) This proposed project has cumulative growth inducing impacts that will encourage the expansion of air cargo facilities and air cargo flights significantly!	1-121.2
2) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.	I
3) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.	I-121.3
4) The Draft EIR contains multiple numerical and data errors and omissions, that reduce the quality, credibility and accuracy making it misleading and deceptive in its claims for mitigation of significant impacts from noise flights. No airplane engine sound comparisons were made at various distances and altitudes.	I-121.4
5) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.	-121.5
6) Needs more an alysis and comparisons of Pollutants from air cargo planes, like Amazon, FedEx and UPS, which emit Hydro Carbons (HC) and byproduct such as carbon dioxide (CO2) and Carbon monoxides (CO), nitrogen oxides (NOx), and particulate matter (PM) during flight.	I-121.6
7) EPA studies show Air (Cargo) plane noise can adversely affect the academic performance of our children and increasing distractions.	I
The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined, nitrogen oxides (NOx), particulate matter (PM), and ozone increases.	I-121.7
We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.	

Scott Rose July 21, 2024

- I-121.1 This comment is paragraph 1 of Form Letter B. As such, please see Form Letter B Response.
- I-121.2 This comment generally alleges the Proposed Project will have significant cumulative growth-inducing impacts. As discussed in Chapter 4, Other CEQA Considerations, of the EIR, the Proposed Project would not cause indirect growth inducement.
- **I-121.3** This comment is paragraphs 2–3 of Form Letter B. As such, please see Form Letter B Response.
- I-121.4 This comment generally claims the EIR contains "numerical errors and omissions" but only raises concerns regarding airplane engine sound comparisons at various distances and altitudes. Because there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. Hence, noise emission levels from this aircraft type, as established in the AEDT (version 3e) aviation noise prediction software, has been used to inform aviation noise assessment attributed to project cargo flights.
- **I-121.5** This comment is paragraph 5 of Form Letter B. As such, please see Form Letter B Response.
- I-121.6 This comment generally states that cargo aircraft emit hydrocarbons, CO₂, CO, NO_x, and particulate matter. Section 3.2, Air Quality, of the EIR discussed the sources of emissions associated with the Proposed Project and disclosed that the Proposed Project would generate VOCs, CO, NO_x, SO_x, PM₁₀, PM_{2.5}, and GHGs, including CO₂. As discussed in Section 3.2, Air Quality, of the EIR, impacts associated with operational air quality were identified as being significant and unavoidable even with the application of MM-AQ-3 (Improved Energy Efficiency and Water Reduction), MM-AQ-4 (Truck Requirements), MM-AQ-5 (Commute Trip Reduction), and MM-AQ-6 (Additional Air Quality Tenant Requirements). The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- I-121.7 This comment is paragraphs 8–10 of Form Letter B. As such, please see Form Letter B Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

matt silveous <mattsilveous1812@gmail.com>

Sun 7/21/2024 7:06 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Once again The JPA is on the side of the

Developers, first its trucks then warehouse. Now it's airplanes, when will it be enough. This community was not designed for all this added conjugation.

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

<name> <zip code>

I-122.1

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Matt Silveous July 21, 2024

I-122.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

SHARI BARNES <sbarnes656@aol.com>

Sun 7/21/2024 7:19 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Please!

Thank you.

Sincerely, Sharon Barnes 92508 1-123.1

Sharon Barnes July 21, 2024

I-123.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Jon and Sandi Cabrera <josa6@hotmail.com> Sun 7/21/2024 1:05 PM To:Jeffrey Smith <smith@marchjpa.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.
Sandi Cabrera
Sincerely,
<name>
<zip code>

Sent from my iPhone

1-124.1

Sandi Cabrera July 21, 2024

I-124.1 This comment is Form Letter A. As such, please see Form Letter A Response.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Shirley <fungyinandjoseph@gmail.com>

Sun 7/21/2024 1:42 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.

2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-125.1

3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Shirley Ng CA 92508

Shirley Ng July 21, 2024

I-125.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Josie Sosa <josie.sosa@gmail.com>

Sun 7/21/2024 8:03 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Josie Sosa 92508 1-126.1

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Josie Sosa July 21, 2024

I-126.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Michael Hampton hampton2005@gmail.com

Sun 7/21/2024 6:13 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-127.1

- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Michael Hampton 92506

Michael Hampton July 21, 2024

I-127.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Tyftun20 < Tyftun20@protonmail.com>

Sun 7/21/2024 12:56 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

We are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects.

Riverside and Moreno Valley are already not respected cities held in high regard and this would make it worse. Who would want to move here and raise a family or create a business that they could be proud of in cities turned into cargo hubs?

Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely,

Maria Estabrooks 92508

Sent from ProtonMail Mobile

1-128.1

Maria Estabrooks July 21, 2024

I-128.1 This comment is Form Letter A, with the addition of "Riverside and Moreno Valley are already not respected cities held in high regard and this would make it worse. Who would want to move here and raise a family or create a business that they could be proud of in cities turned into cargo hubs?" This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Michele Muehls <michelebello@hotmail.com>

Sun 7/21/2024 7:20 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Michele Muehls 92506

~Michele 99

Sent from my iPhone

1-129.1

Michele Muehls July 21, 2024

I-129.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Veronica Juarez <vjuarez0326@gmail.com>

Sun 7/21/2024 2:52 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.

2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-130.1

3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Veronica Juarez 92508

Veronica Juarez July 21, 2024

I-130.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

William Landa <wisaiahlanda@gmail.com>

Sun 7/21/2024 11:11 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, William Landa 92518 I-131.1

William Landa July 21, 2024

I-131.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Shari Shelton <sharlyn801@gmail.com>

Mon 7/22/2024 5:40 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com> Cc:sharlyn801@gmail.com <sharlyn801@gmail.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?

Are there any plans to monitor and report on air quality data in real-time?

I I-132.3

Has the project considered the potential health risks associated with poor air quality?

What measures are in place to address potential respiratory issues from increased air pollution?

I I-132.5

How will the project impact the overall noise levels in the region?

Are there any plans to implement noise mitigation strategies for affected communities?

I I-132.7

1-132.1

Has the project considered the potential disruption to local wildlife from increased noise pollution?] 1-132.8
What measures are in place to address potential sleep disturbances from airport operations?] 1-132.9
How will the project impact the overall light pollution in the region?	I I-132.10
Are there any plans to implement dark sky initiatives to reduce light pollution?] -132.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?] 1-132.12
What measures are in place to address potential light trespass issues for nearby residents?	I I-132.13
How will the project impact the overall water quality in the region?] -132.14
Are there any plans to prevent water contamination from airport operations?	I I-132.15
Has the project considered the potential runoff and drainage issues from the project site?] 1-132.16
What measures are in place to address potential water scarcity concerns in the area?] 1-132.17
How will the project impact the overall soil quality in the region?] -132.18
Are there any plans to prevent soil erosion and degradation from construction activities?] -132.19
Has the project considered the potential contamination of soil from hazardous materials?] -132.20
What measures are in place to address potential soil remediation needs in the area?] -132.21
How will the project impact the overall traffic congestion in the region?] -132.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?] 1-132.23
Has the project considered the potential increase in accidents from congested roadways?	I I-132.24
What measures are in place to address potential traffic management challenges?	I I-132.25
How will the project impact the overall public transportation system in the region?	I I-132.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-132.27
Has the project considered the potential strain on public transportation services?	I I-132.28
What measures are in place to address potential accessibility issues for public transit users?	I I-132.29
How will the project impact the overall community health and safety in the region?	I I-132.30
Are there any plans to promote healthy living initiatives for residents in the area?] 1-132.31
Has the project considered the potential health risks associated with increased pollution?] 1-132.32

Page 2 of 3 in Comment Letter I-132

What measures are in place to address potential emergency response needs for the community?	I I-132.33
How will the project impact the overall community resilience to environmental hazards?	I-132.34
Are there any plans to implement disaster preparedness programs for the community?	I I-132.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-132.36
What measures are in place to address potential public health crises in the region?	I I-132.37
How will the project comply with local, state, and federal environmental regulations?	I I-132.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I I-132.39
Has the project obtained all necessary permits and approvals for construction and operation?	I-132.40
What measures are in place to address potential regulatory violations during the project?	I-132.41
How will the project ensure long-term sustainability and environmental stewardship?] 1-132.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I -132.43
Has the project considered the potential need for adaptive management strategies?	I-132.44
What measures are in place to promote environmental education and awareness in the community?] I-132.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-132.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	I I-132.47
Has the project considered the potential need for independent environmental audits and reviews?	I I-132.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I I-132.49
How will the project address any unforeseen environmental challenges or emergencies?	I-132.50
Are there any plans to establish a contingency fund for environmental mitigation efforts?] -132.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	1-132.52

Kindly,

Shari Shelton-Geeson (951)746-7028 7450 Northrop Dr. #268 Riverisde, CA 92508 Sharlyn801@gmail.com Sent from my iPhone

Page 3 of 3 in Comment Letter I-132

Response to Comment Letter I-132

Shari Shelton-Geeson July 22, 2024

I-132.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-132.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-132.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-132.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-132.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-132.6	This comment is FAQ-NOI-10. Please see the response to FAQ- NOI-10.
I-132.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-132.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-132.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-132.10	This comment is FAQ-AES-10. Please see the response to FAQ-AES-10.
I-132.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-132.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-132.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-132.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-132.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-132.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-132.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-132.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-132.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-132.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-132.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-132.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

I-132.23 This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4. I-132.24 This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6. I-132.25 This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15. I-132.26 This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12. I-132.27 This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2. I-132.28 This comment is FAO-TRA-7. Please see the response to FAO-TRA-7. I-132.29 This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14. I-132.30 This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9. I-132.31 This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3. I-132.32 This comment is recorded as FAO-AO-4 and FAO-HAZ-73. Please see the responses to FAO-AO-4 and FAQ-HAZ-73. I-132.33 This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4. I-132.34 This comment is FAQ-HAZ-35. Please see the response to FAQ-HAZ-35. I-132.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10. I-132.36 This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6. I-132.37 This comment is FAO-MISC-10. Please see the response to FAO-MISC-10. I-132.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7. I-132.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1. I-132.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4. I-132.41 This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9. I-132.42 This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11. I-132.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3. I-132.44 This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5. I-132.45 This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8. I-132.46 I-132.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2. I-132.48 This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6. I-132.49 This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12. I-132.50 This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5. I-132.51 This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2. I-132.52 This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-133

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Bill Clark <pop92517@gmail.com>

Mon 7/22/2024 6:09 AM

To:+CBFCentury@aol.com <+CBFCentury@aol.com>;Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly, that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR: How will the project impact the local wildlife and ecosystems? Are there any endangered species in the project area that could be affected? What measures are in place to protect water quality in the surrounding areas? Has the potential impact on groundwater been thoroughly assessed? Are there any plans to mitigate the project's impact on air quality? How will the project affect the overall noise levels in the area? What steps will be taken to minimize light pollution from the project? Has the project considered the long-term effects on climate change? Are there any plans for sustainable energy use in the project? How will the project impact local traffic patterns and congestion? What measures are in place to ensure the safety of pedestrians and cyclists in the area? Has the project considered the potential increase in accidents due to increased traffic? Are there any plans to improve public transportation access to the project site? How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? Has the project considered the cumulative impact of other nearby developments? Are there any plans to address potential environmental justice concerns in the project area? How will the project affect the visual aesthetics of the surrounding area? Are there any plans to preserve or enhance the natural beauty of the project site? Has the project considered the impact on property values in the surrounding area? What measures are in place to address potential soil contamination from the project? How will the project impact the local economy and job market? Are there any plans to mitigate the project's impact on local businesses? Has the project considered the potential displacement of residents or businesses? What measures are in place to address potential cultural heritage sites in the project area? How will the project impact the overall community cohesion and social dynamics? Are there any plans to address potential gentrification issues in the project area? Has the project considered the potential increase in demand for public services? What measures are in place to address potential strain on local infrastructure? How will the project impact the availability of affordable housing in the area? Are there any plans to address potential noise pollution from increased aviation activities? How will the project impact the local schools and educational facilities? Has the project considered the potential impact on healthcare services in the area? What measures are in place to address potential emergency response challenges? Are there any plans to mitigate the project's impact on nearby recreational areas? How will the project impact the overall sense of community in the area? Has the project considered the potential increase in light pollution from the airport operations? What measures are in place to address potential safety hazards from increased air traffic? How will the project impact the local flora and fauna in the area? Are there any plans to mitigate the project's impact on migratory bird populations? Has the project considered the potential disruption to local ecosystems from increased aviation activities? What measures are in place to address potential water pollution from airport operations? How will the project impact the overall biodiversity of the area? Are there any plans to preserve or enhance natural habitats in the project area? Has the project considered the potential increase in greenhouse gas emissions from airport operations? What measures are in place to promote sustainable aviation practices? How will the project impact the overall carbon footprint of the region? Are there any plans to offset the project's carbon emissions through environmental initiatives? Has the project considered the potential impact of increased aviation activities on local weather patterns? What measures are in place to address potential climate change effects from airport operations? Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns. Sincerely, [Your Full Name] [Your Contact Information] [Your Address] [Your Email Address]

I-133.2 I-133.3-4 I-133.5-6 I-133 7-8 I-133.9-10 1-133.11-12 I-133.13 I-133.14-15 I-133.16-17 I-133.18 I-133 19-20 I-133.21-22 I-133.23-24 1-133.25 1-133.26-27 I-133 28-29 1-133.30-31 I-133 32 1-133.33-34 1-133.35-36 I-133.37 I-133.38-39 I-133.40-41 1-133 42 I-133.43-44 I-133 45

1-133.46-47

I-133.48-49 I-133.50

I-133.51

1-133.52

I-133.1

William R. Clark 541 Atwood Ct, Riverside, CA 92506 pop92517@gmail.com

Response to Comment Letter I-133

William R. Clark July 22, 2024

I-133.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-133.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-133.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-133.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-133.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-133.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-133.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-133.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-133.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-133.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-133.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-133.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-133.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-133.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-133.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-133.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-133.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-133.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-133.19	This comment is FAQ-AES-10. Please see the response to FAQ-AES-10.
I-133.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-133.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-133.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-133.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-133.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-133.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-133.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-133.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-133.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-133.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-133.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-133.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-133.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-133.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-133.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-133.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-133.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-133.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-133.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-133.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-133.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-133.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-133.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-133.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-133.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-133.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-133.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-133.47 This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
I-133.48 This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
I-133.49 This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-133.50 This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-133.51 This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
I-133.52 This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-134

Meridian D1 Gateway Aviation Center Project

Yesenia Contreras <yesenia.contreras26@yahoo.com>

Mon 7/22/2024 2:38 PM
To:Jeffrey Smith <smith@marchjpa.com>
Dear Mr.Smith,

I am writing to you as a concerned resident of Riverside county. My main concerns with the proposed aviation center project are 1) an increase in air pollution and 2) the adverse health effects residents would experience. Riverside county already has the second highest particle pollution in the nation, the last thing we need is thousands of flights passing over our cities every year- in addition to the trucks this project includes. I'm also concerned with the increase in noise pollution. Flights would pass directly over Mead Valley and Good Hope, which are both rural, quiet areas. Unfortunately, EIR's do not take into account the cumulative effects of diesel emissions, but residents of Riverside county can see and feel the effects in our daily lives. All in all, I adamantly oppose this project.

Thank you, Yesenia Contreras

Response to Comment Letter I-134

Yesenia Contreras July 22, 2024

- **I-134.1** This is a general introductory comment. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-134.2 This comment raises general concerns regarding air quality and health impacts. The Proposed Project Health Risk Assessment (Appendix C-1) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from project construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from project operations. As shown in Table 3.2-16, the Proposed Project would result in a less than significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.
- I-134.3 This comment states a general concern regarding an increase in noise pollution in Mead Valley and Good Hope. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods identified by the comment, Mead Valley and Good Hope, are outside the 60 dBA contour line. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mead Valley and Good Hope. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-134.4 This comment raises concerns regarding the cumulative impacts of diesel emissions. Section 3.2, Air Quality, subsection 3.2.7 Cumulative Effects, included a cumulative analysis of potential cumulative air quality impacts.
- **I-134.5** This comment provides general opposition to the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-135

Public Comment on NOA of the Draft EIR for the Meridian D-1 Gateway Aviation Center Project

Melanie Murray <swellmel66@gmail.com>

Mon 7/22/2024 11:39 AM

To:Jeffrey Smith <smith@marchjpa.com>
Cc:district5@rivco.org <district5@rivco.org>;district1@rivo.org <district1@rivo.org>;ccondor@riverside.gov
<ccondor@riverside.gov>;jperry@riverside.gov <jperry@riverside.gov>;rrogers@cityofperris.org <rrogers@cityofperris.org>;
mvargas@cityofperris.org <mvargas@cityofperris.org>;edd@moval.org <edd@moval.org>;mayor@moval.org

July 22, 2024

Jeffrey M. Smith, AICP Principal Planner March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, CA 92518 smith@marchjpa.com

Good afternoon Mr. Smith,

Thank you for the opportunity to comment on the Notice of Availability of the Draft EIR for the Meridian D-1 Gateway Aviation Center Project (Project). As described in the Draft EIR, the project includes the construction of an approximate 201,200-square-foot cargo building with 9 grade-level loading doors and 42 truck dock positions and an approximate 69,620-square-foot maintenance building with grade-level access and the construction of a tarmac and parking apron, allowing for aircraft to access four proposed aircraft parking gates along the northern side of the cargo building. The project will result in 17 additional private, commercial cargo flights per day, operating six days per week, with 256 additional flights during peak holiday periods.	-135 -135	
As residents within the City of Riverside's Canyon Crest Neighborhood since 2005, we have experienced direct and increasingly negative impacts of the existing commercial operations occurring out of March Inland Port/March Air Reserve Base (March) since they began, first with DHL, now with Amazon. This letter serves to express our strong objection to the proposed expansion of the private commercial cargo operations at March and our objection to any expansion of the arrival and departure flight contours, flight paths, and noise contours.	I-135 I-135	
While we were well aware and fully supportive of the military operations that pre-existed at March when we purchased our current home in 2009, we do not support the use of March for commercial operations. Our home is located approximately ½ mile north of Castelview Park and the military aircraft turn well south of our neighborhood, however the Amazon and other commercial cargo aircraft turn directly over our home at relatively low altitude. We have tracked them at 2000 feet using the Flight Radar app. The noise from multiple existing flights per day is loud enough to interrupt conversations and phone calls while indoors with windows and doors closed. These flights are following a path that exceeds and is in violation of the 2014 Riverside County Airport Land Use Compatibility Plan (ALUCP) for March. We request that the adopted ALUCP be enforced and not expanded or modified to accommodate different aircraft, flight paths, and noise impacts.	-135 -135 -135	5.6
Additionally, since the use of March as a commercial cargo facility, we have observed a significant increase in oily particulate matter in and around our home, property, and vehicles that is presumed to be the result of increased aircraft departure exhaust from the expanded commercial operations. While this is a physical observation, we are extremely concerned about the direct negative impact the extremely toxic jet engine exhaust has on the health of our family. Our family has a history of cancers and several ongoing chronic illnesses that will be exacerbated by the increased and expanded use of March beyond what was previously permitted, analyzed, and anticipated.	I-135	5.8
We vehemently request that the March Joint Powers Commission deny the project and NOT adopt the Final EIR. The expanded use of March has and will continue to have detrimental physical and health related impacts on our property and our family.	I- 1 35	5.9

Respectfully,

Melanie Murray

Response to Comment Letter I-135

Melanie Murray July 22, 2024

- **I-135.1** This comment is introductory in nature but incorrectly describes the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **I-135.2** This comment describes the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-135.3 This comment expresses opposition to the existing aircraft operations and general opposition to the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-135.4 This comment provides general opposition to the existing operations. No comments, questions, or concerns about the environmental analysis included in the EIR are raised. Section 3.11, Noise, analyzed the Proposed Project's potential impacts regarding noise. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- **I-135.5** This comment expresses opposition to commercial cargo flights under existing conditions. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- It is comment asserts that some commercial cargo flights are following a path "that exceeds and is in violation of" the 2014 ALUCP. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhood identified by the comment, Canyon Crest, is outside the 60 dBA contour line. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhood of Canyon Crest.
- **I-135.7** This comment provides general opposition to ALUCP. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.
- I-135.8 This comment raises concerns as to the impacts of existing aircraft activities on air quality and health. The Proposed Project Health Risk Assessment (Appendix C-1 of the EIR) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from project construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from project operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity.

I-135.9 This comment expresses opposition to the Proposed Project and restates concerns regarding health impacts from both the existing operations and the Proposed Project. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-136

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Gomez, Michelle < MGomez1@mvusd.net>

Mon 7/22/2024 11:10 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?

Are there any endangered species in the project area that could be affected?

What measures are in place to protect water quality in the surrounding areas?

Has the potential impact on groundwater been thoroughly assessed?

Are there any plans to mitigate the project's impact on air quality?

How will the project affect the overall noise levels in the area?

What steps will be taken to minimize light pollution from the project?

Has the project considered the long-term effects on climate change?

Are there any plans for sustainable energy use in the project?

How will the project impact local traffic patterns and congestion?

What measures are in place to ensure the safety of pedestrians and cyclists in the area?

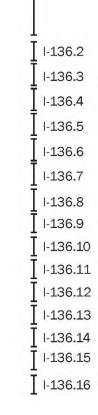
Has the project considered the potential increase in accidents due to increased traffic?

Are there any plans to improve public transportation access to the project site?

How will the project impact the quality of life for nearby residents?

What measures are in place to address potential health risks associated with the project?

1-136.1



Has the project considered the cumulative impact of other nearby developments?	I I-136.17
Are there any plans to address potential environmental justice concerns in the project area?	I I-136.18
How will the project affect the visual aesthetics of the surrounding area?	I I-136.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-136.20
Has the project considered the impact on property values in the surrounding area?	I I-136.21
What measures are in place to address potential soil contamination from the project?	I I-136.22
How will the project impact the local economy and job market?	I I-136.23
Are there any plans to mitigate the project's impact on local businesses?	Ī I-136.24
Has the project considered the potential displacement of residents or businesses?	I I-136.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-136.26
How will the project impact the overall community cohesion and social dynamics?	I I-136.27
Are there any plans to address potential gentrification issues in the project area?	I I-136.28
Has the project considered the potential increase in demand for public services?	I I-136.29
What measures are in place to address potential strain on local infrastructure?	I I-136.30
How will the project impact the availability of affordable housing in the area?	I I-136.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-136.32
How will the project impact the local schools and educational facilities?	I I-136.33
Has the project considered the potential impact on healthcare services in the area?	I I-136.34
What measures are in place to address potential emergency response challenges?	I I-136.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	I I-136.36
How will the project impact the overall sense of community in the area?	I I-136.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-136.38
What measures are in place to address potential safety hazards from increased air traffic?	I I-136.39
How will the project impact the local flora and fauna in the area?	I I-136.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I I-136.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I I-136.42
What measures are in place to address potential water pollution from airport operations?	I I-136.43
How will the project impact the overall biodiversity of the area?	I I-136.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-136.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-136.46
What measures are in place to promote sustainable aviation practices?	I I-136.47
How will the project impact the overall carbon footprint of the region?	I I-136.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I I-136.49

Page 2 of 4 in Comment Letter I-136

Has the project considered the potential impact of increased aviation activities on local weather patterns?

I -136.50

What measures are in place to address potential climate change effects from airport operations?

T I-136.51

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

1-136.52

Sincerely,

Michelle Gomez

Professional School Counselor 14149 Avenida Munoz, Riverside, CA 92508

> Students, take a look at this brief video to get tips on how to write a professional email to your school counselor and/or teachers! It makes all the difference when communicating with others. https://www.youtube.com/watch?





Michelle Gomez Professional School Counselor

Canyon Springs High School Office: (951) 571-4760 Voice/text: (909) 521-0604 Email: mgomez1@mvusd.net

Moreno Valley Unified School District

faceb ook icon

twi tter

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instagr am icon

We can all prevent suicide. Free and confidential support 24/7 is a click away: Suicide Prevention **Hotline**

Know the Signs: Pain isn't always obvious, but most suicidal people show some signs that they are thinking about suicide. https://www.suicideispreventable.org

Page 3 of 4 in Comment Letter I-136

Do you need to text with a licensed trained mental health professional? Text toll-free 24/7 to $(844)\ 204-0880$.

Page 4 of 4 in Comment Letter I-136

Response to Comment Letter I-136

Michelle Gomez July 22, 2024

I-136.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-136.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-136.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-136.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-136.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-136.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-136.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-136.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-136.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-136.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-136.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-136.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-136.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-136.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-136.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-136.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-136.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-136.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-136.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-136.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-136.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-136.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-136.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-136.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-136.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-136.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-136.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-136.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-136.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-136.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-136.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-136.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-136.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-136.34	This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9.
I-136.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-136.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-136.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-136.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-136.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-136.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
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I-136.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-136.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-136.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-136.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-136.47	This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
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I-136.49	This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-136.50	This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-136.51	This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
I-136.52	This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-137

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Jarrod Favors < jfavors43@gmail.com>

Mon 7/22/2024 3:17 PM

 $\label{lem:compact} \textbf{To:Jeffrey Smith} < smith@marchjpa.com>; + CBFCentury@aol.com < + CBFCentury@aol.com>; + C$

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

How will the project impact the local wildlife and ecosystems?

Are there any endangered species in the project area that could be affected?

What measures are in place to protect water quality in the surrounding areas?

Has the potential impact on groundwater been thoroughly assessed?

Are there any plans to mitigate the project's impact on air quality?

How will the project affect the overall noise levels in the area?

What steps will be taken to minimize light pollution from the project?

Has the project considered the long-term effects on climate change?

Are there any plans for sustainable energy use in the project?

What measures are in place to ensure the safety of pedestrians and cyclists in the area?

Has the project considered the potential increase in accidents due to increased traffic?

Are there any plans to improve public transportation access to the project site?

How will the project impact the quality of life for nearby residents?

How will the project impact local traffic patterns and congestion?

What measures are in place to address potential health risks associated with the project?

1-137.1

| I-137.2 | I-137.3 | I-137.4 | I-137.5 | I-137.6 | I-137.7 | I-137.8 | I-137.9 | I-137.10 | I-137.11 | I-137.12 | I-137.13 | I-137.14 | I-137.15

1-137.16

Has the project considered the cumulative impact of other nearby developments?	I I-137.17
Are there any plans to address potential environmental justice concerns in the project area?	I 1-137.18
How will the project affect the visual aesthetics of the surrounding area?	I I-137.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-137.20
Has the project considered the impact on property values in the surrounding area?	I I-137.21
What measures are in place to address potential soil contamination from the project?	I I-137.22
How will the project impact the local economy and job market?	I I-137.23
Are there any plans to mitigate the project's impact on local businesses?	I -137.24
Has the project considered the potential displacement of residents or businesses?	I I-137.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-137.26
How will the project impact the overall community cohesion and social dynamics?	I I-137.27
Are there any plans to address potential gentrification issues in the project area?	I I-137.28
Has the project considered the potential increase in demand for public services?	I I-137.29
What measures are in place to address potential strain on local infrastructure?	I I-137.30
How will the project impact the availability of affordable housing in the area?	I 1-137.31
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How will the project impact the local schools and educational facilities?	I I-137.33
Has the project considered the potential impact on healthcare services in the area?	I I-137.34
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What measures are in place to address potential safety hazards from increased air traffic?	I I-137.39
How will the project impact the local flora and fauna in the area?	I I-137.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I -137.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I I-137.42
What measures are in place to address potential water pollution from airport operations?	I I-137.43
How will the project impact the overall biodiversity of the area?	I I-137.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-137.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-137.46
What measures are in place to promote sustainable aviation practices?	I I-137.47
How will the project impact the overall carbon footprint of the region?	I I-137.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I I-137.49

Page 2 of 3 in Comment Letter I-137

Has the project considered the potential impact of increased aviation activities on local weather patterns?

What measures are in place to address potential climate change effects from airport operations?

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address

Jarrod t favors sr. 951-966-2330] 1170 Brasado Way, Riverside, CA 92508 jfavors43@gmail.com

Page 3 of 3 in Comment Letter I-137

Response to Comment Letter I-137

Jarrod T. Favors Sr. July 22, 2024

I-137.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-137.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-137.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-137.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-137.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-137.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-137.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-137.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-137.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-137.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-137.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-137.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-137.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-137.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-137.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-137.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-137.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-137.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-137.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-137.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-137.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-137.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-137.23 This comment is FAQ-POP-9. Please see the response to FAQ-POP-9. I-137.24 This comment is FAQ-POP-3. Please see the response to FAQ-POP-3. I-137.25 This comment is FAQ-POP-4. Please see the response to FAQ-POP-4. I-137.26 This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3. I-137.27 This comment is FAQ-LU-3. Please see the response to FAQ-LU-3. I-137.28 This comment is FAO-EJ-7. Please see the response to FAO-EJ-7. I-137.29 This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1. I-137.30 This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4. I-137.31 This comment is FAQ-POP-7. Please see the response to FAQ-POP-7. I-137.32 This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1. I-137.33 This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3. I-137.34 This comment is FAO-PUB-8. Please see the response to FAO-PUB-8. I-137.35This comment is FAO-PUB-2. Please see the response to FAO-PUB-2. I-137.36 This comment is FAQ-REC-2. Please see the response to FAQ-REC-2. I-137.37 This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAO-MISC-9. I-137.38 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-137.39 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-137.40 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-137.41 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-137.42 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-137.43 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-137.44 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-137.45 This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7. I-137.46 This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- **I-137.47** This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
- **I-137.48** This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
- **I-137.49** This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- **I-137.50** This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- **I-137.51** This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- **I-137.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-138

Eden Vitakis

From: Gale Schulte <gale.schulte@yahoo.com>
Sent: Monday, July 22, 2024 4:05 PM

To: Jeffrey Smith

Subject: Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you. Sincerely,

Chris Schulte

1-138.1

Chris Schulte July 22, 2024

I-138.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-139

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Jeannine Sabel <j9sabel@gmail.com>

Mon 7/22/2024 11:42 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

We do not want increased air traffic over our homes. Please consider all the people living beneath these harmful flight plans!!

Thank you.

Sincerely, Jeannine Sabel 92506 I-139.1

Jeannine Sabel July 22, 2024

I-139.1 This comment is Form Letter A, with the addition of "We do not want increased air traffic over our homes. Please consider all the people living beneath these harmful flight plans!!" This added text does not raise any new or different environmental issues than what is already included in the form letter. As such, please see Form Letter A Response.

Comment Letter I-140

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Ole Becker <ole.becker@gmail.com>

Mon 7/22/2024 6:26 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-140.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	I-140.2
Are there any endangered species in the project area that could be affected?	I I-140.3
What measures are in place to protect water quality in the surrounding areas?	I I-140.4
Has the potential impact on groundwater been thoroughly assessed?] 1-140.5
Are there any plans to mitigate the project's impact on air quality?	I I-140.6
How will the project affect the overall noise levels in the area?	I I-140.7

What steps will be taken to minimize light pollution from the projection	ect?	-140.8
Has the project considered the long-term effects on climate change	ge?	I-140.9
Are there any plans for sustainable energy use in the project?	I	I-140.10
How will the project impact local traffic patterns and congestion?	Ι	-140.11
What measures are in place to ensure the safety of pedestrians an	nd cyclists in the area?	I-140.12
Has the project considered the potential increase in accidents due	e to increased traffic?	 -140.13
Are there any plans to improve public transportation access to the	e project site?	I-140.14
How will the project impact the quality of life for nearby residents	;?	-140.15
What measures are in place to address potential health risks associ	ciated with the project?	 -140.16
Has the project considered the cumulative impact of other nearby	/ developments?	I-140.17
Are there any plans to address potential environmental justice cor	ncerns in the project area?	 -140.18
How will the project affect the visual aesthetics of the surrounding	g area?	I-140.19
Are there any plans to preserve or enhance the natural beauty of	the project site?	-140.20
Has the project considered the impact on property values in the s	urrounding area?	I-140.21
What measures are in place to address potential soil contamination	on from the project?	I-140.22
How will the project impact the local economy and job market?	I	-140.23
Are there any plans to mitigate the project's impact on local busin	nesses?	I-140.24
Has the project considered the potential displacement of resident	ts or businesses?	I-140.25
What measures are in place to address potential cultural heritage	sites in the project area?	I-140.26
How will the project impact the overall community cohesion and s	social dynamics?	l-140.27
Are there any plans to address potential gentrification issues in th	ne project area?	l-140.28
Has the project considered the potential increase in demand for p	public services?	I-140.29
What measures are in place to address potential strain on local in	frastructure?	l- 14 0.30
How will the project impact the availability of affordable housing	in the area?	-140.31
Are there any plans to address potential noise pollution from incre	eased aviation activities?	I-140.32

Page 2 of 4 in Comment Letter I-140

How will the project impact the local schools and educational facilities?	I-140.33
Has the project considered the potential impact on healthcare services in the area?	I -140.34
What measures are in place to address potential emergency response challenges?	I-140.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	I-140.36
How will the project impact the overall sense of community in the area?	I I-140.37
Has the project considered the potential increase in light pollution from the airport operations?] -140.38
What measures are in place to address potential safety hazards from increased air traffic?] 1-140.39
How will the project impact the local flora and fauna in the area?	I I-140.40
Are there any plans to mitigate the project's impact on migratory bird populations?] -140.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I-140.42
What measures are in place to address potential water pollution from airport operations?	I I-140.43
How will the project impact the overall biodiversity of the area?	I 1-140.44
Are there any plans to preserve or enhance natural habitats in the project area?	I-140.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I -140.46
What measures are in place to promote sustainable aviation practices?	I I-140.47
How will the project impact the overall carbon footprint of the region?] -140.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I -140.49
Has the project considered the potential impact of increased aviation activities on local weather patterns?	I-140.50
What measures are in place to address potential climate change effects from airport operations?] -140.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-140.52

Sincerely,

Jörn Ole Becker 6164 Oswego Dr. Riverside, CA 92506

Page 3 of 4 in Comment Letter I-140

ole.becker@gmail.com [Your Email Address]

Page 4 of 4 in Comment Letter I-140

Jörn Ole Becker July 22, 2024

I-140.1	This comment is the FAQ Introduction. As such, in response please see the FAQ Introduction Response.
I-140.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-140.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-140.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-140.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-140.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-140.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-140.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-140.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-140.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-140.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-140.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-140.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-140.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-140.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-140.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-140.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-140.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-140.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-140.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-140.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-140.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-140.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-140.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-140.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-140.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-140.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-140.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-140.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-140.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-140.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-140.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-140.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-140.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-140.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-140.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-140.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-140.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-140.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-140.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-140.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-140.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-140.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-140.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-140.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-140.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-140.47	This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
I-140.48	This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
I-140.49	This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-140.50	This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-140.51	This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
l-140.52	This comment is conclusory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-141

Eden Vitakis

From: Gale Schulte <gale.schulte@yahoo.com>

Sent: Monday, July 22, 2024 4:05 PM

To: Jeffrey Smith

Subject: Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives. Thank you. Sincerely,

Gale Schulte

1-141.1

DECEMBER 2025

Gale Schulte July 22, 2024

I-141.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-142

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Gurumantra Khalsa < gkhalsa@worldbewell.org>

Mon 7/22/2024 12:58 PM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I believe the EIR is inadequate and fails to address or mitigate numerous negative environmental impacts this project will cause to my community and those communities contiguous to this project.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR:

What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?

Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?

How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?

What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered to minimize environmental impact?

How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft-related operational emissions, including the refueling of aircraft and the associated GHG emissions, as modeled using AEDT Version 3C in the report?

How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and emissions criteria?

What is the mitigation strategy for the heat island impact effect from this project?

1-142.1

1-142.2

I-142.3

1-142.4

1-142.5

1-142.6

I-142.7

L

I I-142.8

What is the emergency response plan for any toxic chemicals or explosive ordinance that may be buried on the project site? Are there any provisions for emergency response and contingency planning in case of hazardous materials incidents?

1-142.9

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively $I_{-142.10}$ address these concerns.

Yours in a World Being Well,

Gurumantra Khalsa Founder, World Be Well Org.



www.WorldBeWell.org 4108 Watkins Dr. Riverside, CA 92507-4701 951-640-3868

Page 2 of 2 in Comment Letter I-142

Gurumantra Khalsa July 22, 2024

- I-142.1 This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
- I-142.2 This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3.
- I-142.3 This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAQ-LU-1.
- **I-142.4** This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
- **I-142.5** This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15.
- **I-142.6** This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10.
- **I-142.7** This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5.
- I-142.8 This comment questions the mitigation strategy for the heat island effect. The urban heat island effect can be caused by large-scale development projects where natural landscapes are replaced with concrete, asphalt, and buildings. The Proposed Project would not remove substantial natural vegetation. Tall buildings may alter wind patterns; however, the Proposed Project would be height-limited to comply with airport land use zoning. The removal of large, vegetated areas may result in changes in humidity and precipitation; however, the Proposed Project would not replace large, vegetated areas. The Proposed Project would not alter existing habitat or local water bodies.
- I-142.9 This comment questions the emergency response plan for toxic chemicals or explosive ordnance that could be buried on site. As discussed in Section 3.8, Hazards and Hazardous Materials, of the EIR, MM-HAZ-1 (Hazardous Materials Contingency Plan) requires preparation and approval of an HMCP that includes procedures for evaluation of contaminated soils and soil vapor and procedures to handle any hazardous materials identified in these environmental media. Additionally, MM-HAZ-2 (Stop Work, Groundwater Management) requires work to stop and regulatory authorities to be contacted if groundwater is encountered. Further, sites that store hazardous materials in volumes greater than reportable quantities are required, under existing regulations, to create and implement spill prevention and response plans. Compliance with these regulations is required by law. The local Certified Unified Program Agency (Riverside County DEH) conducts regular inspections of facilities within their jurisdiction to verify compliance with applicable hazardous waste and materials handling laws and regulations. Section 9.08.090 (Hazardous Materials Management) of the March JPA Development Code sets hazardous material management requirements for operations within the March JPA Planning Area.

Activity and use limitations are in place at the project site, specifically for Parcel D-1 due to the location within Site 7. A portion of Site 7 is already occupied by existing development to the south of the project site and would not be disturbed. The Proposed Project would leave the portion of Site 7 that includes the burn areas undisturbed. As part of construction of the Proposed Project, expansion of the existing

access roadway to the south of the project site would slightly overlap with Site 7; however, it would avoid the burn areas within Site 7. There are Environmental Restrictive Covenants that apply to Site 7 and include notification to EPA and DTSC for specific activities at the project site. The Environmental Restrictive Covenants are enforceable by the State of California, U.S. Department of Air Force, and EPA. Additionally, the HCMP required by MM-HAZ-1 would be submitted to EPA and DTSC for review/approval prior to the start of construction for review of the protective measures during work within Site 7.

Further, in response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project now includes a parcel map to subdivide an existing 56.33-acre parcel of the D-1 property into two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes (Figure 2-11). The western developable parcel will encompass the Air Cargo Component of the Proposed Project and exclude all of Site 7. The eastern constrained parcel, which fronts Heacock Street, will encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment, and its addition does not change the analysis in the EIR.

I-142.10 This comment is conclusory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-143

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Gary Ceasar < garyceasar@firstteam.com>

Mon 7/22/2024 8:25 AM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com>
Dear Mr. Smith.

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR: 1-143.2 How will the project impact the overall air quality in the region? 1-143.3Are there any plans to monitor and report on air quality data in real-time? 1-143.4Has the project considered the potential health risks associated with poor air quality? 1-143.5What measures are in place to address potential respiratory issues from increased air pollution? 1-143.6How will the project impact the overall noise levels in the region? 1-143.7 Are there any plans to implement noise mitigation strategies for affected communities? 1-143.8 Has the project considered the potential disruption to local wildlife from increased noise pollution? 1-143.9 What measures are in place to address potential sleep disturbances from airport operations? 1-143.10 How will the project impact the overall light pollution in the region? Are there any plans to implement dark sky initiatives to reduce light pollution? I-143.11 Has the project considered the potential impact on nocturnal animals from increased artificial lighting? 1-143.121-143.13 What measures are in place to address potential light trespass issues for nearby residents? 1-143.14 How will the project impact the overall water quality in the region? 1-143.15 Are there any plans to prevent water contamination from airport operations? T |-143.16 Has the project considered the potential runoff and drainage issues from the project site?

1-143.1

What measures are in place to address potential water scarcity concerns in the area?	I -143.17
How will the project impact the overall soil quality in the region?	I -143.18
Are there any plans to prevent soil erosion and degradation from construction activities?	I -143.19
Has the project considered the potential contamination of soil from hazardous materials?	I -143.20
What measures are in place to address potential soil remediation needs in the area?	Ī I-143.21
How will the project impact the overall traffic congestion in the region?	Ī I-143.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?	Ī I-143.23
Has the project considered the potential increase in accidents from congested roadways?	Ī I-143.24
What measures are in place to address potential traffic management challenges?	Ī I-143.25
How will the project impact the overall public transportation system in the region?	I -143.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-143.27
Has the project considered the potential strain on public transportation services?	I -143.28
What measures are in place to address potential accessibility issues for public transit users?	I -143.29
How will the project impact the overall community health and safety in the region?	I -143.30
Are there any plans to promote healthy living initiatives for residents in the area?	I -143.31
Has the project considered the potential health risks associated with increased pollution?	I -143.32
What measures are in place to address potential emergency response needs for the community?	I -143.33
How will the project impact the overall community resilience to environmental hazards?	I I-143.34
Are there any plans to implement disaster preparedness programs for the community?	I I-143.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-143.36
What measures are in place to address potential public health crises in the region?	I I-143.37
How will the project comply with local, state, and federal environmental regulations?	I ∣-143.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I 1-143.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-143.40
What measures are in place to address potential regulatory violations during the project?	I I-143.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-143.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I I-143.43
Has the project considered the potential need for adaptive management strategies?	I I-143.44
What measures are in place to promote environmental education and awareness in the community?	I I-143.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-143.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	I I-143.47
Has the project considered the potential need for independent environmental audits and reviews?	I I-143.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I -143.49

Page 2 of 3 in Comment Letter I-143

How will the project address any unforeseen environmental challenges or emergencies?

Are there any plans to establish a contingency fund for environmental mitigation efforts?

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

I -143.50
I -143.51
I -143.52

Sincerely,

[Gary CeasarYour Full Name]

[Your Contact Information] [Your Address] [Your Email Address]

ATTENTION: Cybercrime and online fraud are on the rise. If you receive any email containing WIRE TRANSFER INSTRUCTIONS, you are advised to VERIFY that all wire transfer instructions are correct PRIOR to transferring any funds. Please immediately contact your Escrow Officer for assistance with verification.

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Page 3 of 3 in Comment Letter I-143

Gary Ceasar July 22, 2024

I-143.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-143.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-143.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-143.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-143.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-143.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-143.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-143.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-143.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-143.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-143.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-143.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-143.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-143.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-143.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-143.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-143.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-143.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-143.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-143.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-143.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-143.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

I-143.23 This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4. I-143.24 This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6. I-143.25 This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15. I-143.26 This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12. I-143.27 This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2. I-143.28 This comment is FAO-TRA-7. Please see the response to FAO-TRA-7. I-143.29 This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14. I-143.30 This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9. I-143.31 This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3. I-143.32 This comment is recorded as FAO-AO-4 and FAO-HAZ-73. Please see the responses to FAO-AO-4 and FAQ-HAZ-73. I-143.33 This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4. I-143.34 This comment is FAQ-HAZ-35. Please see the response to FAQ-HAZ-35. I-143.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10. I-143.36 This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6. I-143.37 This comment is FAO-MISC-10. Please see the response to FAO-MISC-10. I-143.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7. I-143.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1. I-143.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4. I-143.41 This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9. I-143.42 This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11. I-143.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3. I-143.44 This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5.

This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

I-143.45

analysis included in the EIR are raised.

I-143.46 This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8.
I-143.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2.
I-143.48 This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6.
I-143.49 This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12.
I-143.50 This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5.
I-143.51 This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2.
I-143.52 This comment is conclusory in nature. No comments, questions, or concerns about the environmental

Comment Letter I-144

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Gary Ceasar < garyceasar@firstteam.com>

Mon 7/22/2024 8:27 AM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid waste diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or after 2020 and annually thereafter?

How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613. particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and

What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?

Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?

How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?

What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment to minimize environmental impact?

How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft-related operational emissions, including the refueling of aircraft and the associated GHG emissions, as modeled using AEDT Version 3C in the report?

Can the report provide more information on the quantification of refrigerant emissions from air-conditioning equipment during regular operation and routine servicing over the equipment lifetime, as mentioned in the report?

How does the project ensure consistency with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard to meet the required standards and guidelines for sustainable development and energy efficiency? 1-144.1

144.2

144.8

What specific goals and policies from the Local March Joint Powers Authority General Plan are being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	-144.11
How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	1-144.12
What measures are being taken to reduce emissions associated with the transportation of goods and vehicles related to the Proposed Project, as mentioned in the report?	-144.13
How does the project plan to address emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment?	-144.14
Can the report provide more details on the consistency evaluation of the Proposed Project with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard?	1-144.15
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What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	I-144.18
Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	-144.19
How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	I -144.20
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Can the report provide more information on the quantification of refrigerant emissions from air-conditioning equipment during regular operation and routine servicing over the equipment lifetime, as mentioned in the report?	1-144.23
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What specific goals and policies from the Local March Joint Powers Authority General Plan are being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	1-144.25
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What measures are being taken to reduce emissions associated with the transportation of goods and vehicles related to the Proposed Project, as mentioned in the report?	I I-144.27
How does the project plan to address emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment?	I-144.27 I-144.28 I-144.29
Can the report provide more details on the consistency evaluation of the Proposed Project with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard?	I -144.29
What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid waste diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or after 2020 and annually thereafter?	I-144.30

Page 2 of 4 in Comment Letter I-144

How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and emissions criteria?	-144.31
What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	I-144.32
Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	I-144.33
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How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?] 1-144.40
What measures are being taken to reduce emissions associated with the transportation of goods and vehicles related to the Proposed Project, as mentioned in the report?	1-144.41
How does the project plan to address emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment?] 1-144.42
Can the report provide more details on the consistency evaluation of the Proposed Project with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard?	1-144.43
How does the Meridian D-1 Gateway Aviation Center Project plan to address the potential impact on winter tourism and the ski season due to climate change, specifically in terms of mitigating the reduction in ski season length at lower elevations as mentioned in the report?] 1-144.44
What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid waste diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or after 2020 and annually thereafter?	1-144.45
How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and emissions criteria?	I-144.46
What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	I-144.47
Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	I-144.48 I-144.49
How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	1-144.49

Page 3 of 4 in Comment Letter I-144

What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment to minimize environmental impact?

How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft-related operational emissions, including the refueling of aircraft and the associated GHG emissions, as modeled using AEDT Version 3C in the report?

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

Sincerely,

Gary Ceasar 7075 City View Circle Riverside 92506 garyceasar@firstteam.com

[Your Full Name] [Your Contact Information] [Your Address] [Your Email Address]

ATTENTION: Cybercrime and online fraud are on the rise. If you receive any email containing WIRE TRANSFER INSTRUCTIONS, you are advised to VERIFY that all wire transfer instructions are correct PRIOR to transferring any funds. Please immediately contact your Escrow Officer for assistance with verification.

This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. §§ 2510-2521. The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

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Gary Ceasar July 22, 2024

I-144.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-144.2	This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6.
I-144.3	This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5.
I-144.4	This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3.
I-144.5	This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAQ-LU-1.
I-144.6	This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
I-144.7	This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15.
I-144.8	This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10.
I-144.9	This comment is FAQ-GHG-4. Please see the response to FAQ-GHG-4.
I-144.10	This comment is FAQ-ENG-5. Please see the response to FAQ-ENG-5.
I-144.11	This comment is recorded as FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13. Please see the responses to FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13.
I-144.12	This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
I-144.13	This comment is FAQ-AQ-12. Please see the response to FAQ-AQ-12.
I-144.14	This comment is FAQ-AQ-8. Please see the response to FAQ-AQ-8.
I-144.15	This comment is FAQ-ENG-4. Please see the response to FAQ-ENG-4.
I-144.16	This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6.
I-144.17	This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5.
I-144.18	This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3.
I-144.19	This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAQ-LU-1.
I-144.20	This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
I-144.21	This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15.

I-144.22 This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10. I-144.23 This comment is FAQ-GHG-4. Please see the response to FAQ-GHG-4. I-144.24 This comment is FAQ-ENG-5. Please see the response to FAQ-ENG-5. I-144.25 This comment is recorded as FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13. Please see the responses to FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13. I-144.26 This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7. I-144.27 This comment is FAQ-AQ-12. Please see the response to FAQ-AQ-12. I-144.28 This comment is FAQ-AQ-8. Please see the response to FAQ-AQ-8. I-144.29 This comment is FAO-ENG-4. Please see the response to FAO-ENG-4. I-144.30 This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6. I-144.31 This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5. I-144.32 This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3. I-144.33 This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAQ-LU-1. I-144.34 This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7. I-144.35 This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15. I-144.36 This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10. I-144.37 This comment is FAQ-GHG-4. Please see the response to FAQ-GHG-4. I-144.38 This comment is FAO-ENG-5. Please see the response to FAO-ENG-5. I-143.39 This comment is recorded as FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13. Please see the responses to FAO-AO-16, FAO-GHG-14, FAO-LU-6, and FAO-NOI-13. I-144.40 This comment is FAO-AO-7. Please see the response to FAO-AO-7. I-144.41 This comment is FAQ-AQ-12. Please see the response to FAQ-AQ-12. I-144.42 This comment is FAQ-AQ-8. Please see the response to FAQ-AQ-8. I-144.43 This comment is FAQ-ENG-4. Please see the response to FAQ-ENG-4. I-144.44 This comment is FAQ-MISC-8. Please see the response to FAQ-MISC-8

- **I-144.45** This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6.
- **I-144.46** This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5.
- **I-144.47** This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3.
- **I-144.48** This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAQ-LU-1.
- **I-144.49** This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
- **I-144.50** This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15.
- **I-144.51** This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10.
- **I-144.52** This comment is conclusory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-145

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Gary Ceasar < garyceasar@firstteam.com>

Mon 7/22/2024 8:23 AM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

	_
How will the project impact the local wildlife and ecosystems?	I I-145.2
Are there any endangered species in the project area that could be affected?	I I-145.3
What measures are in place to protect water quality in the surrounding areas?	I I-145.4
Has the potential impact on groundwater been thoroughly assessed?	I I-145.5
Are there any plans to mitigate the project's impact on air quality?	I I-145.6
How will the project affect the overall noise levels in the area?	I I-145.7
What steps will be taken to minimize light pollution from the project?	I I-145.8
Has the project considered the long-term effects on climate change?	I I-145.9
Are there any plans for sustainable energy use in the project?	I I-145.10
How will the project impact local traffic patterns and congestion?	I I-145.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I I-145.12
Has the project considered the potential increase in accidents due to increased traffic?	I I-145.13
Are there any plans to improve public transportation access to the project site?	I I-145.14
How will the project impact the quality of life for nearby residents?	I I-145.15
What measures are in place to address potential health risks associated with the project?	I I-145.16

1-145.1

Has the project considered the cumulative impact of other nearby developments?	I I-145.17
Are there any plans to address potential environmental justice concerns in the project area?	I I-145.18
How will the project affect the visual aesthetics of the surrounding area?	I I-145.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-145.20
Has the project considered the impact on property values in the surrounding area?	I I-145.21
What measures are in place to address potential soil contamination from the project?	I I-145.22
How will the project impact the local economy and job market?	I I-145.23
Are there any plans to mitigate the project's impact on local businesses?	I I-145.24
Has the project considered the potential displacement of residents or businesses?	I I-145.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-145.26
How will the project impact the overall community cohesion and social dynamics?	I I-145.27
Are there any plans to address potential gentrification issues in the project area?	I I-145.28
Has the project considered the potential increase in demand for public services?	I I-145.29
What measures are in place to address potential strain on local infrastructure?	I I-145.30
How will the project impact the availability of affordable housing in the area?	I I-145.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-145.32
How will the project impact the local schools and educational facilities?	I I-145.33
Has the project considered the potential impact on healthcare services in the area?	I I-145.34
What measures are in place to address potential emergency response challenges?	I 1-145.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	T I-145.36
How will the project impact the overall sense of community in the area?	T I-145.37
Has the project considered the potential increase in light pollution from the airport operations?	T I-145.38
What measures are in place to address potential safety hazards from increased air traffic?	T I-145.39
How will the project impact the local flora and fauna in the area?	Ī 1-145.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I 1-145.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I 1-145.42
What measures are in place to address potential water pollution from airport operations?	I I-145.43
How will the project impact the overall biodiversity of the area?	_ T -145.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-145.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-145.46
What measures are in place to promote sustainable aviation practices?	I I-145.47
How will the project impact the overall carbon footprint of the region?	I I-145.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I I-145.49

Page 2 of 3 in Comment Letter I-145

T I-145.50 Has the project considered the potential impact of increased aviation activities on local weather patterns? | |-145.51 What measures are in place to address potential climate change effects from airport operations? -| |-145.52 Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively

Sincerely,

address these concerns.

Gary Ceasar City View Circle Riverside 92506 garyceasar@firstteam.com

ATTENTION: Cybercrime and online fraud are on the rise. If you receive any email containing WIRE TRANSFER INSTRUCTIONS, you are advised to VERIFY that all wire transfer instructions are correct PRIOR to transferring any funds. Please immediately contact your Escrow Officer for assistance with verification.

This email is covered by the Electronic Communications Privacy Act, 18 U.S.C. §\$ 2510-2521. The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

Page 3 of 3 in Comment Letter I-145

Response to Comment Letter I-145

Gary Ceasar July 22, 2024

I-145.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-145.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-145.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-145.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-145.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-145.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-145.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-145.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-145.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-145.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-145.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-145.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-145.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-145.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-145.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-145.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-145.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-145.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-145.19	This comment is FAQ-AES-10. Please see the response to FAQ-AES-10.
I-145.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-145.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-145.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-145.23 This comment is FAQ-POP-9. Please see the response to FAQ-POP-9. I-145.24 This comment is FAQ-POP-3. Please see the response to FAQ-POP-3. I-145.25 This comment is FAQ-POP-4. Please see the response to FAQ-POP-4. I-145.26 This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3. I-145.27 This comment is FAQ-LU-3. Please see the response to FAQ-LU-3. I-145.28 This comment is FAO-EJ-7. Please see the response to FAO-EJ-7. I-145.29 This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1. I-145.30 This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4. I-145.31 This comment is FAQ-POP-7. Please see the response to FAQ-POP-7. I-145.32 This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1. I-145.33 This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3. I-145.34 This comment is FAO-PUB-8. Please see the response to FAO-PUB-8. I-145.35 This comment is FAO-PUB-2. Please see the response to FAO-PUB-2. I-145.36 This comment is FAQ-REC-2. Please see the response to FAQ-REC-2. I-145.37 This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAO-MISC-9. I-145.38 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-145.39 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-145.40 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-145.41 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-145.42 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-145.43 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-145.44 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-145.45 This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7. I-145.46 This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- I-145.47 This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
 I-145.48 This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
 I-145.49 This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
 I-145.50 This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
 I-145.51 This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- **I-145.52** This comment is conclusory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-146

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

FRANK ERDODI < honiebun2k@aol.com>

Mon 7/22/2024 7:45 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Frank and Michelle Erdodi 92508

Sent from my iPad

1-146.1

Response to Comment Letter I-146

Frank and Michelle Erdodi July 22, 2024

I-146.1 This comment is Form Letter A. As such, in response please see Form Letter A Response.

Comment Letter I-147

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Amy Murillo <aclockwo@gmail.com>

Mon 7/22/2024 9:30 AM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-147.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

What specific hazardous materials were historically used, stored, or disposed of at the former March AFB that could impact the project site?

T I-147.2

Are there any ongoing monitoring programs in place to track the levels of hazardous materials in the soil, soil gas, and groundwater at the project site?

1-147.3

Are there any plans in place to mitigate the risks associated with PFAS contamination in the soil and groundwater?

I |-147.4

How will the project ensure compliance with federal, state, and local regulations regarding the handling, transport, and disposal of hazardous materials?

1-147.5

What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential hazards?

I-147.6

Are there any contingency plans in case of accidental release of hazardous materials during construction?

|-147.7

How will the project address the potential safety hazards posed by the expansion and modification of the existing southern access roadway?

∏ |-147.8 ∏ |-147.9

What measures are in place to prevent the exposure of people or structures to significant risks of loss, injury, or death involving wildland fires?

I |-147.10

Are there any provisions for regular audits and inspections to ensure compliance with hazardous materials management requirements?

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

1-147.11

Sincerely,

Amy C. Murillo, Ph.D. 1031 Clearwood Ave, Riverside CA, 92506

aclockwo@gmail.com

Response to Comment Letter I-147

Amy C. Murillo, PhD July 22, 2024

I-147.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-147.2	This comment is FAQ-HAZ-58. Please see the response to FAQ-HAZ-58.
I-147.3	This comment is recorded as FAQ-HAZ-71 and FAQ-HYD-24. Please see the responses to FAQ-HAZ-71 and FAQ-HYD-24.
I-147.4	This comment is recorded as FAQ-HAZ-9 and FAQ-HYD-25. Please see the responses to FAQ-HAZ-9 and FAQ-HYD-25.
I-147.5	This comment is FAQ-HAZ-31. Please see the response to FAQ-HAZ-31.
I-147.6	This comment is a question regarding sensitive receptors. Please see the responses to FAQ-AQ-17, FAQ-HAZ-66, and FAQ-NOI-14.
I-147.7	This comment is FAQ-HAZ-1. Please see the response to FAQ-HAZ-1.
I-147.8	This comment is recorded as FAQ-HAZ-28 and FAQ-TRA-9. Please see the responses to FAQ-HAZ-28 and FAQ-TRA-9.
I-147.9	This comment is FAQ-HAZ-44. Please see the response to FAQ-HAZ-44.
I-147.10	This comment is FAQ-HAZ-70. Please see the response to FAQ-HAZ-70.
I-147.11	This comment is conclusory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-148

Eden Vitakis

From: Annette Heying <aheying@sbcglobal.net>

Sent: Monday, July 22, 2024 4:55 PM
To: Jeffrey Smith; CBFCentury@aol.com

Subject: Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH

2021040012)

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-148.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

What specific hazardous materials were historically used, stored, or disposed of at the former March AFB that could impact the project site?

1-148.

Are there any ongoing monitoring programs in place to track the levels of hazardous materials in the soil, soil gas, and groundwater at the project site?

1-148.3

How will the project address the contamination of chlorinated VOCs, particularly trichloroethylene (TCE), in the soil, soil gas, and groundwater?

1-148.

What are the potential health risks associated with exposure to PFOS and PFOA in the soil and groundwater at the project site?

1-148.5

How will the project ensure the safety of workers and future occupants in light of the documented soil, soil gas, and groundwater contamination at Site 7?

I-148.6

Are there any plans in place to mitigate the risks associated with PFAS contamination in the soil and groundwater?

T I-148.7

1

What measures will be taken to prevent the spread of contaminated groundwater during construction activities?] -148.8
How will the project ensure compliance with federal, state, and local regulations regarding the handling, transport, and disposal of hazardous materials?	I-148.9
What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential hazards?	I-148.10
Are there any contingency plans in case of accidental release of hazardous materials during construction?] -148.11
How will the project address the potential safety hazards posed by the expansion and modification of the existing southern access roadway?	I-148.12
What measures are in place to prevent the exposure of people or structures to significant risks of loss, injury, or death involving wildland fires?	-148.13
How will the project ensure that hazardous materials are stored, used, and transported in compliance with relevant regulations?	I-148.14
Are there any plans for the safe removal and disposal of hazardous wastes during construction?] -148.15
What role will the California Office of Emergency Services play in overseeing the handling and release of hazardous materials during the project?	I-148.16
How will the project comply with the hazardous substances regulations enforced by the California Occupational Safety and Health Administration?	I -148.17
Are there any specific guidelines in place for the handling of asbestos during construction activities?] -148.18
What measures will be taken to ensure the safety of workers exposed to hazardous substances during construction?] -148.19
How will the project address the potential risks associated with construction activities near contaminated groundwater wells?	I-148.20
Are there any plans to monitor and manage contaminated groundwater encountered during excavation activities?] -148.21
What procedures will be followed in case of groundwater contamination during construction?	I I-148.22
How will the project ensure that contaminated groundwater is properly managed and treated if encountered during construction?	I-148.23
What measures are in place to prevent the disturbance of existing treatment systems (e.g., soil vapor extraction systems) during construction?	I-148.24
How will the project address potential impacts on wildlife, particularly birds, attracted to the project site?] -148.25
Are there any specific measures in place to protect wildlife and prevent potential safety risks to aircraft in flight?] I-148.26
What steps will be taken to incorporate recommendations from the Wildlife Hazard Review into the project design?	I I-148.27
How will the project ensure that noise levels are within acceptable limits for nearby land uses?] -148.28

2

Page 2 of 4 in Comment Letter I-148

Are there any plans to mitigate noise impacts on nearby residential areas during construction and operation?] -148.29
What measures will be taken to reduce noise intrusions upon indoor activities within the project site?	I-148.30
How will the project comply with the California Building Code requirements for interior environmental comfort regarding noise levels?	g]-148.31
Are there any provisions for providing hearing protection to workers exposed to excessive noise during construction?	I-148.32
What measures are in place to prevent potential safety hazards that could interfere with aircraft operations?	I -148.33
How will the project address potential safety risks associated with drainage features and vegetation attracting animals near the active runway?	1-148.34
Are there any specific guidelines for the construction of drainage features and vegetation to minimize safety risks to aircraft?	I-148.35
What steps will be taken to ensure that the project does not exacerbate existing conditions of hazardous materials on the site?	I-148.36
How will the project ensure that impacts associated with hazardous materials are controlled and do not have cumulative effects?	· I-148.37
Are there any plans to monitor and address any cumulative impacts of handling, transporting, and disposing of hazardous materials from nearby projects?	I-148.38
What measures will be taken to ensure that the project does not contribute to cumulative hazards in the area?	I -148.39
How will the project address any potential long-term sustainability issues related to hazardous materials and waste management?	-148.40
Are there any plans for ongoing monitoring and maintenance of hazardous materials after the completion of the project	? TI-148.41
What measures will be taken to ensure the long-term safety and health of workers and occupants in relation to hazardous materials?] -148.42
How will the project ensure compliance with all relevant environmental regulations throughout the project's lifespan?	I -148.43
Are there any provisions for public access to information regarding hazardous materials used, stored, or disposed of at the project site?	1-148.44
What steps will be taken to address any unforeseen hazards or risks that may arise during the project's construction and operation?	1-148.45
How will the project address any potential environmental justice concerns related to hazardous materials and waste management?	I-148.46
Are there any plans in place to involve the local community in decision-making processes regarding hazardous materials and waste management?	- I-148.47
What measures will be taken to ensure transparency and accountability in the handling of hazardous materials throughout the project?	- -148.48
2	

Page 3 of 4 in Comment Letter I-148

How will the project address any potential conflicts with existing environmental regulations and guidelines?	I -148.49
Are there any provisions for regular audits and inspections to ensure compliance with hazardous materials management requirements?	I-148.50
What steps will be taken to address any gaps or deficiencies in the current hazardous materials management plan?] -148.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I I-148.52

Sincerely,

Annette Heying 1242 Villanova PI Riverside, CA 92506 Aheying@sbcglobal.net

Annette

4

Page 4 of 4 in Comment Letter I-148

Response to Comment Letter I-148

Annette Heying July 22, 2024

1-148.1	This comment is the FAQ introduction. As such, please see the FAQ introduction Response.
I-148.2	This comment is FAQ-HAZ-58. Please see the response to FAQ-HAZ-58.
I-148.3	This comment is recorded as FAQ-HAZ-71 and FAQ-HYD-24. Please see the responses to FAQ-HAZ-71 and FAQ-HYD-24.
I-148.4	This comment is recorded as FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29. Please see the responses to FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29.
I-148.5	This comment is FAQ-HAZ-78. Please see the response to FAQ-HAZ-78.
I-148.6	This comment is FAQ-HAZ-77. Please see the response to FAQ-HAZ-77.
I-148.7	This comment is recorded as FAQ-HAZ-9 and FAQ-HYD-25. Please see the responses to FAQ-HAZ-9 and FAQ-HYD-25.
I-148.8	This comment is FAQ-HYD-22. Please see the response to FAQ-HYD-22.
l-148.9	This comment is FAQ-HAZ-31. Please see the response to FAQ-HAZ-31.
I-148.10	This comment is a question regarding sensitive receptors. Please see the responses to FAQ-AQ-17, FAQ-HAZ-66, and FAQ-NOI-14.
l-148.11	This comment is FAQ-HAZ-1. Please see the response to FAQ-HAZ-1.
I-148.12	This comment is a question regarding safety hazards. Please see the responses to FAQ-HAZ-28 and FAQ-TRA-9.
I-148.13	This comment is FAQ-HAZ-44. Please see the response to FAQ-HAZ-44.
I-148.14	This comment is FAQ-HAZ-34. Please see the response to FAQ-HAZ-34.
l-148.15	This comment is FAQ-HAZ-7. Please see the response to FAQ-HAZ-7.
I-148.16	This comment is FAQ-HAZ-57. Please see the response to FAQ-HAZ-57.
I-148.17	This comment is FAQ-HAZ-29. Please see the response to FAQ-HAZ-29.
l-148.18	This comment is FAQ-HAZ-17. Please see the response to FAQ-HAZ-17.
I-148.19	This comment is FAQ-HAZ-54. Please see the response to FAQ-HAZ-54.
l-148.20	This comment is FAQ-HYD-12. Please see the response to FAQ-HYD-12.

I-148.21	This comment is FAQ-HYD-2. Please see the response to FAQ-HYD-2.
I-148.22	This comment is FAQ-HYD-23. Please see the response to FAQ-HYD-23.
I-148.23	This comment is FAQ-HYD-14. Please see the response to FAQ-HYD-14.
I-148.24	This comment is FAQ-HAZ-43. Please see the response to FAQ-HAZ-43.
I-148.25	This comment is FAQ-BIO-13. Please see the response to FAQ-BIO-13.
I-148.26	This comment is FAQ-BIO-8. Please see the response to FAQ-BIO-8.
I-148.27	This comment is FAQ-BIO-22. Please see the response to FAQ-BIO-22.
I-148.28	This comment is FAQ-NOI-9. Please see the response to FAQ-NOI-9.
I-148.29	This comment is FAQ-NOI-4. Please see the response to FAQ-NOI-4.
I-148.30	This comment is FAQ-NOI-12. Please see the response to FAQ-NOI-12.
I-148.31	This comment is FAQ-NOI-8. Please see the response to FAQ-NOI-8.
I-148.32	This comment is FAQ-NOI-5. Please see the response to FAQ-NOI-5.
I-148.33	This comment is FAQ-HAZ-42. Please see the response to FAQ-HAZ-42.
I-148.34	This comment is FAQ-BIO-14. Please see the response to FAQ-BIO-14.
I-148.35	This comment is FAQ-HAZ-72. Please see the response to FAQ-HAZ-72.
I-148.36	This comment is FAQ-HAZ-62. Please see the response to FAQ-HAZ-62.
I-148.37	This comment is FAQ-HAZ-68. Please see the response to FAQ-HAZ-68.
I-148.38	This comment is FAQ-HAZ-67. Please see the response to FAQ-HAZ-67.
I-148.39	This comment is FAQ-HAZ-69. Please see the response to FAQ-HAZ-69.
I-148.40	This comment is FAQ-HAZ-24. Please see the response to FAQ-HAZ-24.
I-148.41	This comment is FAQ-HAZ-3. Please see the response to FAQ-HAZ-3.
I-148.42	This comment is FAQ-HAZ-52. Please see the response to FAQ-HAZ-52.
I-148.43	This comment is FAQ-PROCESS-6. Please see the response to FAQ-PROCESS-6.
I-148.44	This comment is FAQ-HAZ-14. Please see the response to FAQ-HAZ-14.
I-148.45	This comment is FAQ-HAZ-61. Please see the response to FAQ-HAZ-61.

I-148.46	This comment is FAQ-HAZ-23. Please see the response to FAQ-HAZ-23.
I-148.47	This comment is FAQ-HAZ-8. Please see the response to FAQ-HAZ-8.
I-148.48	This comment is FAQ-HAZ-55. Please see the response to FAQ-HAZ-55.
I-148.49	This comment is FAQ-PROCESS-5. Please see the response to FAQ-PROCESS-5.
I-148.50	This comment is FAQ-HAZ-15. Please see the response to FAQ-HAZ-15.
I-148.51	This comment is FAQ-HAZ-59. Please see the response to FAQ-HAZ-59.
I-148.52	This comment is conclusory in nature. No comments, questions, or concerns about the environmental analysis included in the EIR are raised.

Comment Letter I-149

1-149.1

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

barbararvrsd <barbararvrsd@aol.com>

Mon 7/22/2024 2:02 PM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the guality of life for the residents in the

area. More specifically, I would like to comment and question the following related to the EIR:	1
•What measures are in place to protect the local population from exposure to harmful chemicals or pollutants released by the project?	I I-149.2
• How will the project impact the availability of affordable housing and rental properties in the region?	I I-149.3
• Are there any plans to address the potential displacement of low-income residents and vulnerable communities caused by the project?	I I-149.4
• Has the report considered the impact of the project on local cultural heritage sites and historical landmarks?	I I-149.5
•What measures are in place to ensure the project's alignment with sustainable development goals and environmental best practices?	I I-149.6
• How will the project impact the local job market and employment opportunities for residents?	I I-149.7
• Are there any plans to address the potential increase in noise pollution and disturbances from the project's activities?	I I-149.8
• Has the report thoroughly assessed the risk of contamination of local water sources and aquifers due to the project?	I I-149.9
•What measures are in place to protect the local flora and fauna species, especially those that are rare or endangered?	I -149.10
• How will the project impact the overall landscape and visual aesthetics of the surrounding area?	I -149.11
• Are there any plans to address the potential loss of green spaces and recreational areas caused by the project?	I I-149.12
• Has the report considered the impact of the project on local traffic patterns and congestion in the area?	<u>I</u> I-149.13
•What measures are in place to mitigate the potential increase in air and noise pollution from the project's operations?	<u>I</u> I-149.14
• How will the project impact the availability of public parks and open spaces for the community?	I 1-149.15
• Are there any plans to address the potential disruption of local ecosystems and natural habitats due to the project?	I I-149.16
• Has the report thoroughly assessed the risk of soil erosion and sedimentation from construction activities related to the project?	I -149.17
•What measures are in place to prevent the release of hazardous materials and chemicals into the environment during and after construction?	I ∣-149.18
•How will the project impact the overall health and well-being of residents living in the vicinity?	I I-149.19
• Are there any plans to address the potential increase in waste generation and landfill usage resulting from the project?	I I-149.20
• Has the report considered the impact of the project on nearby water bodies and aquatic ecosystems?	I I-149.21
•What measures are in place to ensure the safe disposal of construction debris and waste materials?	I I-149.22
• How will the project impact the local air quality and emission levels in the region?	I I-149.23
• Are there any plans to address the potential increase in greenhouse gas emissions and carbon footprint from the project?	I I-149.24

• Has the report thoroughly assessed the risk of contamination of local soil and groundwater from construction activities?

T I-149.25

	- 0.00000000
•What measures are in place to protect the local population from exposure to harmful pollutants and toxins?	<u>I</u> 1-149.26
•How will the project impact the availability of affordable housing and rental properties for residents?	I -149.27
• Are there any plans to address the potential displacement of low-income families and vulnerable populations due to the project?	I -149.28 I -149.29
• Has the report considered the impact of the project on local cultural heritage sites and historical landmarks?	T 1-149.29
•What measures are in place to ensure the project's compliance with all relevant environmental regulations and guidelines?	T -149.31
•How will the project impact the local economy, including job creation and economic growth?	I -149.32
• Are there any plans to address the potential increase in light pollution and disruption of natural night skies?	T I-149.33
• Has the report thoroughly assessed the risk of soil contamination and leaching of chemicals from the project site?	I -149.34
•What measures are in place to prevent the spread of invasive species and pests due to the project?	I I-149.35
•How will the project impact the overall biodiversity and ecological balance of the area?	_ I -149.36
•Are there any plans to address the potential loss of native plant and animal species habitats?	I I-149.37
• Has the report considered the impact of the project on local water quality and aquatic ecosystems?	I I-149.38
•What measures are in place to protect the local watershed and prevent water pollution from the project?	I I-149.39
•How will the project impact the availability of clean drinking water for residents in the region?	I I-149.40
• Are there any plans to address the potential disruption of natural drainage patterns and flood risks due to the project?	I I-149.41
• Has the report thoroughly assessed the risk of soil compaction and loss of soil fertility from construction activities?	I I-149.42
•What measures are in place to promote sustainable land use practices and soil conservation?	I I-149.43
•How will the project impact the overall landscape aesthetics and scenic beauty of the area?	I I-149.44
• Are there any plans to address the potential loss of scenic views and natural landscapes caused by the project?	I I-149.45
• Has the report considered the impact of the project on local recreational areas and outdoor recreational opportunities?	I I-149.46
•What measures are in place to ensure the preservation of cultural heritage sites and historical landmarks in the vicinity?	I I-149.47
•How will the project impact the availability of green spaces and public parks for coAmmunity use?	I I-149.48
• Are there any plans to address the potential disruption of local ecosystems and wildlife habitats due to the project?	I I-149.49
• Has the report thoroughly assessed the risk of soil erosion and sediment runoff from the project site?	I I-149.50
•What measures are in place to prevent the release of pollutants and contaminants into the air and water during construction?	I I-149.51
•How will the project impact the overall environmental sustainability and long-term ecological health of the region?	I I-149.52
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address the concerns.	se I -149.53

Sincerely,

Barbara Christie 6848 Rycroft Dr. Riverside CA 92506

barbararvrsd@aol.com

Page 2 of 2 in Comment Letter I-149

Response to Comment Letter I-149

Barbara Christie July 22, 2024

I-149.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-149.2	This comment is FAQ-HAZ-46. Please see the response to FAQ-HAZ-46.
I-149.3	This comment is FAQ-POP-6. Please see the response to FAQ-POP-6.
I-149.4	This comment is FAQ-POP-2. Please see the response to FAQ-POP-2.
I-149.5	This comment is FAQ-CUL-1. Please see the response to FAQ-CUL-1.
I-149.6	This comment is FAQ-ENG-8. Please see the response to FAQ-ENG-8.
I-149.7	This comment is FAQ-POP-12. Please see the response to FAQ-POP-12.
I-149.8	This comment is FAQ-NOI-2. Please see the response to FAQ-NOI-2.
I-149.9	This comment is FAQ-HYD-10. Please see the response to FAQ-HYD-10.
I-149.10	This comment is FAQ-BIO-21. Please see the response to FAQ-BIO-21.
I-149.11	This comment is FAQ-AES-8. Please see the response to FAQ-AES-8.
I-149.12	This comment is FAQ-REC-1. Please see the response to FAQ-REC-1.
I-149.13	This comment is FAQ-TRA-8. Please see the response to FAQ-TRA-8.
I-149.14	This comment is recorded as FAQ-AQ-19 and FAQ-NOI-16. Please see the responses to FAQ-AQ-19 and FAQ-NOI-16.
I-149.15	This comment is FAQ-REC-5. Please see the response to FAQ-REC-5.
I-149.16	This comment is FAQ-BIO-3. Please see the response to FAQ-BIO-3.
I-149.17	This comment is FAQ-GEO-6. Please see the response to FAQ-GEO-6.
I-149.18	This comment is FAQ-HAZ-45. Please see the response to FAQ-HAZ-45.
I-149.19	This comment is FAQ-EJ-4. Please see the response to FAQ-EJ-4.
I-149.20	This comment is FAQ-UTL-1. Please see the response to FAQ-UTL-1.
I-149.21	This comment is recorded as FAQ-BIO-25 and FAQ-HYD-8. Please see the responses to FAQ-BIO-25 and FAQ-HYD-8.

I-149.22 This comment is FAQ-HAZ-39. Please see the response to FAQ-HAZ-39. I-149.23 This comment is FAQ-AQ-10. Please see the response to FAQ-AQ-10. I-149.24 This comment is FAQ-GHG-1. Please see the response to FAQ-GHG-1. I-149.25 This comment is FAQ-HAZ-75. Please see the response to FAQ-HAZ-75. I-149.26 This comment is recorded as FAQ-AQ-20 and FAQ-HAZ-48. Please see the responses to FAQ-AQ-20 and FAQ-HAZ-48. I-149.27 This comment is FAQ-POP-5. Please see the response to FAQ-POP-5. 1-149.28This comment is FAQ-POP-1. Please see the response to FAQ-POP-1. I-149.29 This comment is FAO-CUL-1. Please see the response to FAO-CUL-1. I-149.30 This comment is FAQ-PROCESS-11. Please see the response to FAQ-PROCESS-11. I-149.31 This comment is FAQ-POP-10. Please see the response to FAQ-POP-10. I-149.32 This comment is FAQ-AES-1. Please see the response to FAQ-AES-1. I-149.33 This comment is FAO-HAZ-19. Please see the response to FAO-HAZ-19. I-149.34 This comment is FAQ-BIO-20. Please see the response to FAQ-BIO-20. I-149.35 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-149.36 This comment is FAO-BIO-5. Please see the response to FAO-BIO-5. I-149.37 This comment is recorded as FAQ-BIO-24 and FAQ-HYD-7. Please see the responses to FAQ-BIO-24 and FAQ-HYD-7. 1-149.38This comment is FAO-HYD-20. Please see the response to FAO-HYD-20. I-149.39 This comment is FAQ-HYD-15. Please see the response to FAQ-HYD-15. I-149.40 This comment is FAQ-HYD-1. Please see the response to FAQ-HYD-1. I-149.41 This comment is FAQ-GEO-3. Please see the response to FAQ-GEO-3. I-149.42 This comment is FAQ-ENG-11. Please see the response to FAQ-ENG-11. I-149.43 This comment is FAQ-AES-7. Please see the response to FAQ-AES-7. I-149.44 This comment is FAO-AES-2. Please see the response to FAO-AES-2. I-149.45 This comment is FAQ-REC-3. Please see the response to FAQ-REC-3.

I-149.46 This comment is FAQ-CUL-4. Please see the response to FAQ-CUL-4. I-149.47 This comment is similar to FAQ-REC-4. Please see the response to FAQ-REC-4. I-149.48 This comment is FAQ-BIO-3. Please see the response to FAQ-BIO-3. I-149.49 This comment is FAQ-GEO-5. Please see the response to FAQ-GEO-5. I-149.50 This comment is FAQ-HYD-18. Please see the response to FAQ-HYD-18. I-149.51 This comment is recorded as FAQ-BIO-26 and FAQ-ENG-12. Please see the response to FAQ-BIO-26 and FAQ-ENG-12. I-149.52 This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis included in the EIR.

Comment Letter I-150

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Bill Clark <pop92517@gmail.com>

Mon 7/22/2024 6:26 AM

To:Jeffrey Smith <smith@marchipa.com>

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR: How will the project impact the local wildlife and ecosystems? Are there any endangered species in the project area that could be affected? What measures are in place to protect water quality in the surrounding areas? Has the potential impact on groundwater been thoroughly assessed? Are there any plans to mitigate the project's impact on air quality? How will the project affect the overall noise levels in the area? What steps will be taken to minimize light pollution from the project? Has the project considered the long-term effects on climate change? Are there any plans for sustainable energy use in the project? How will the project impact local traffic patterns and congestion? What measures are in place to ensure the safety of pedestrians and cyclists in the area? Has the project considered the potential increase in accidents due to increased traffic? Are there any plans to improve public transportation access to the project site? How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? Has the project considered the cumulative impact of other nearby developments? Are there any plans to address potential environmental justice concerns in the project area? How will the project affect the visual aesthetics of the surrounding area? Are there any plans to preserve or enhance the natural beauty of the project site? Has the project considered the impact on property values in the surrounding area? What measures are in place to address potential soil contamination from the project? How will the project impact the local economy and job market? Are there any plans to mitigate the project's impact on local businesses? Has the project considered the potential displacement of residents or businesses? What measures are in place to address potential cultural heritage sites in the project area? How will the project impact the overall community cohesion and social dynamics? Are there any plans to address potential gentrification issues in the project area? Has the project considered the potential increase in demand for public services? What measures are in place to address potential strain on local infrastructure? How will the project impact the availability of affordable housing in the area? Are there any plans to address potential noise pollution from increased aviation activities? How will the project impact the local schools and educational facilities? Has the project considered the potential impact on healthcare services in the area? What measures are in place to address potential emergency response challenges? Are there any plans to mitigate the project's impact on nearby recreational areas? How will the project impact the overall sense of community in the area? Has the project considered the potential increase in light pollution from the airport operations? What measures are in place to address potential safety hazards from increased air traffic? How will the project impact the local flora and fauna in the area? Are there any plans to mitigate the project's impact on migratory bird populations? Has the project considered the potential disruption to local ecosystems from increased aviation activities? What measures are in place to address potential water pollution from airport operations? How will the project impact the overall biodiversity of the area? Are there any plans to preserve or enhance natural habitats in the project area? Has the project considered the potential increase in greenhouse gas emissions from airport operations? What measures are in place to promote sustainable aviation practices? How will the project impact the overall carbon footprint of the region? Are there any plans to offset the project's carbon emissions through environmental initiatives? Has the project considered the potential impact of increased aviation activities on local weather patterns? What measures are in place to address potential climate change effects from airport operations? Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

I-150.1

1-150.2 1-150.3-4 I-150.5-6 1-150 7-8 I-150.9-10 I-150.11-12 I-150 13 1-150.14-15 I-150 16-17 I-150.18 I-150.19-20 I-150.21-22 1-150.23-24 1-150.25 1-150.26-27 1-150.28-29 I-150.30-31 I-150.32 1-150.33-34 I-150.35-36 I-150.37 1-150.38-39 I-150.40-41 1-150.42 1-150.43-44 1-150.45 I-150 46-47 I-150.48-49 1-150 50 I-150.51-52

Sincerely,

Bill Clark 541 Atwood Ct, Riverside, CA 92506 pop92517@gmail.com

Response to Comment Letter I-150

Bill Clark July 22, 2024

I-150.1	This comment is the FAQ Introduction. As such, please see FAQ Introduction Response.
I-150.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-150.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-150.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-150.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-150.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-150.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-150.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-150.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-150.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-150.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-150.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-150.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-150.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-150.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-150.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-150.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-150.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-150.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-150.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-150.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-150.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-150.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-150.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-150.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-150.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-150.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-150.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-150.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-150.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-150.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-150.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-150.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-150.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-150.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-150.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-150.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-150.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-150.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-150.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-150.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-150.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-150.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-150.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-150.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-150.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-150.47

- This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10. I-150.48 This comment is recorded as FAQ-ENG-7 and FAQ-GHG-12. Please see the responses to FAQ-ENG-7
- and FAQ-GHG-12.
- I-150.49 This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- I-150.50 This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- I-150.51 This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- I-150.52 This comment is conclusory in nature. The comment raises no comments, questions, or concerns about the environmental analysis included in the EIR.

Comment Letter I-151

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Perez, Corinne <perezc@ajiusa.com>

Mon 7/22/2024 12:45 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-151.1

- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

We have lived in this community for 30 years and have been faced with the loud noise from planes the entire time. Now, you want to add more traffic, why? Whom does this benefit as it is not the residents that are impacted by noise and other pollution. As it is now, we can't walk to the park without looking up at the underbelly of the planes wondering what is being dropped on us. Please reconsider your plan.

1-151.2

Thank you.

Sincerely, Corinne Perez 92508

Response to Comment Letter I-151

Corinne Perez July 22, 2024

- **I-151.1** This comment is Form Letter A. As such, please see Form Letter A Response.
- I-151.2 This comment raises general concerns regarding noise, traffic, and air quality. Section 3.11, Noise, of the EIR, addresses noise impacts. The project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak-hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant. Section 3.2, Air Quality, of the EIR addresses air quality impacts. The comment further provides general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Comment Letter I-152

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

cathy zmudka <cap10s@hotmail.com>

Mon 7/22/2024 2:11 PM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-152.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the proposed project impact local wildlife habitats and biodiversity?

1-152.2

Has the report thoroughly assessed the potential noise pollution from the project on nearby residential areas?

-152.3

What measures are in place to mitigate the impact of increased traffic congestion in the surrounding area?

-152.4

Are there any plans to address the potential increase in air pollution resulting from the project?

1-152.5

How will the project affect the quality of water sources in the vicinity?

1-152.6

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

Has the report considered the long-term effects of the project on the local climate and microclimate?	1-152.7
What steps will be taken to minimize light pollution from the project's operations?	I-152.8
How will the project impact the visual aesthetics of the surrounding area?	1-152.9
Are there any plans to address the potential disruption of local ecosystems caused by the project?] -152.10
Has the report thoroughly assessed the risk of soil contamination from construction activities?] -152.11
What measures are in place to prevent soil erosion during and after construction?	I-152.12
How will the project impact the availability of green spaces and recreational areas in the community?	-152.13
Are there any plans to mitigate the potential loss of agricultural land due to the project?] -152.14
Has the report considered the impact of the project on groundwater resources in the area?	1-152.15
What measures are in place to ensure the safety of nearby residents in case of emergencies related to the project?	I-152.16
How will the project affect the overall air quality in the region?] -152.17
Are there any plans to address the potential increase in greenhouse gas emissions resulting from the project?	I-152.18
Has the report thoroughly assessed the risk of wildfires in the area due to the project?	1-152.19
What measures are in place to protect local water bodies from pollution during and after construction?	1-152.20
How will the project impact the local flora and fauna species, especially those that are endangered or protected?	-152.21
Are there any plans to address the potential displacement of wildlife habitats caused by the project?	-152.22
Has the report considered the impact of the project on nearby wetlands and waterways?	-152.23
What measures are in place to ensure the safe disposal of hazardous materials used during construction and operation?	I-152.24
How will the project impact the overall health and well-being of the local community?	I I-152.25
Are there any plans to address the potential increase in waste generation resulting from the project?] -152.26
Has the report thoroughly assessed the risk of landslides in the area due to the project?] -152.27
What measures are in place to protect the local population from exposure to harmful chemicals or pollutants?	1-152.28

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How will the project impact the availability of affordable housing in the region?	I I-152.29
Are there any plans to address the potential gentrification of the area due to the project?	I -152.30
Has the report considered the impact of the project on the cultural heritage and historical sites in the vicinity?	l-152.31
What measures are in place to ensure the project complies with all relevant environmental regulation and standards?	ns I-152.32
How will the project impact the local economy, including job creation and income generation?	I -152.33
Are there any plans to address the potential increase in light and noise pollution from the project's operations?	I-152.34
Has the report thoroughly assessed the risk of flooding in the area due to the project?	1-152.35
What measures are in place to protect the local population from the spread of diseases or health haz associated with the project?	zards
How will the project impact the availability of public transportation and infrastructure in the region?	I -152.37
Are there any plans to address the potential strain on public services and utilities caused by the project	ect? [I-152.38
Has the report considered the impact of the project on property values and real estate in the surrounding area?	I-152.39
What measures are in place to ensure the project's long-term sustainability and environmental stewardship?	I-152.40
How will the project impact the overall livability and quality of life for residents in the community?] -152.41
Are there any plans to address the potential social inequalities or disparities that may arise from the project?	I-152.42
Has the report thoroughly assessed the risk of soil contamination from hazardous waste disposal related to the project?	l-152.43
What measures are in place to protect vulnerable populations, such as children and the elderly, from project's negative impacts?	the I-152.44
How will the project impact the local infrastructure, including roads, bridges, and utilities?	I I-152.45
Are there any plans to address the potential increase in traffic accidents and road safety issues result from the project?	ing I-152.46
Has the report considered the impact of the project on nearby schools, hospitals, and other essential services?	I I-152.47

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What measures are in place to ensure the project's compliance with all relevant zoning and land use regulations?	I	-152.48
How will the project impact the overall social cohesion and community well-being in the area?		-152.49
Are there any plans to address the potential loss of community cohesion and sense of belonging due to the project?		-152.50
Has the report thoroughly assessed the risk of air and water pollution from the project's operations?	-	-152.51
Traffic on Alessandro Blvd. and other roads in the vicinity of proposed project is already congested and this will contribute to making it worse.	I	-152.52
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I	-152.53

Sincerely,

Cathy Zmudka 19114 Pemberton Place Riverside, CA 92508 cap10s@hotmail.com

Sent from my iPad

Page 4 of 4 in Comment Letter I-152

Response to Comment Letter I-152

Cathy Zmudka July 22, 2024

I-152.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-152.2	This comment is FAQ-BIO-19. Please see the response to FAQ-BIO-19.
I-152.3	This comment is FAQ-NOI-6. Please see the response to FAQ-NOI-6.
I-152.4	This comment is FAQ-TRA-17. Please see the response to FAQ-TRA-17.
I-152.5	This comment is FAQ-AQ-1. Please see the response to FAQ-AQ-1.
I-152.6	This comment is FAQ-HYD-13. Please see the response to FAQ-HYD-13.
I-152.7	This comment questions impacts to local climate and microclimate. Please see the responses to FAQ-AQ-6 and FAQ-GHG-9.
I-152.8	This comment is FAQ-AES-13. Please see the response to FAQ-AES-13.
I-152.9	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-152.10	This comment is FAQ-BIO-4. Please see the response to FAQ-BIO-4.
I-152.11	This comment questions risk of soil contamination during construction. Please see the responses to FAQ-GEO-4 and FAQ-HAZ-20.
I-152.12	This comment is FAQ-GEO-8. Please see the response to FAQ-GEO-8.
I-152.13	This comment is FAQ-REC-4. Please see the response to FAQ-REC-4.
I-152.14	This comment is FAQ-AG-1. Please see the response to FAQ-AG-1.
I-152.15	This comment is FAQ-HYD-6. Please see the response to FAQ-HYD-6.
I-152.16	This comment is FAQ-HAZ-41. Please see the response to FAQ-HAZ-41.
I-152.17	This comment is FAQ-AQ-9. Please see the response to FAQ-AQ-9.
I-152.18	This comment is FAQ-GHG-2. Please see the response to FAQ-GHG-2.
I-152.19	This comment is FAQ-FIRE-1. Please see the response to FAQ-FIRE-1.
I-152.20	This comment is FAQ-HYD-19. Please see the response to FAQ-HYD-19.
I-152.21	This comment is FAQ-BIO-16. Please see the response to FAQ-BIO-16.

I-152.22 This comment is FAQ-BIO-2. Please see the response to FAQ-BIO-2. I-152.23 This comment questions impacts to nearby wetlands and waterways. Please see the responses to FAQ-BIO-12 and FAQ-HYD-9. I-152.24 This comment is FAQ-HAZ-40. Please see the response to FAQ-HAZ-40. I-152.25 This comment is FAQ-EJ-5. Please see the response to FAQ-EJ-5. I-152.26 This comment is FAQ-UTL-1. Please see the response to FAQ-UTL-1. I-152.27 This comment is FAQ-GEO-2. Please see the response to FAQ-GEO-2. I-152.28 This comment is FAQ-HAZ-47. Please see the response to FAQ-HAZ-47. I-152.29 This comment is FAO-POP-8. Please see the response to FAO-POP-8. I-152.30 This comment is FAQ-EJ-8. Please see the response to FAQ-EJ-8. I-152.31 This comment is FAQ-CUL-2. Please see the response to FAQ-CUL-2. I-152.32 This comment is FAQ-PROCESS-10. Please see the response to FAQ-PROCESS-10. I-152.33 This comment is FAO-POP-11. Please see the response to FAO-POP-11. I-152.34 This comment questions light and noise pollution. Please see the responses to FAQ-AES-14 and FAO-NOI-15. I-152.35 This comment is FAQ-HYD-11. Please see the response to FAQ-HYD-11. I-152.36 This comment is FAQ-MISC-12. Please see the response to FAQ-MISC-12. This comment is FAQ-TRA-11. Please see the response to FAQ-TRA-11. I-152.37 I-152.38 This comment questions potential strain on public services and utilities. Please see the responses to FAQ-PUB-6 and FAQ-UTL-8. I-152.39 This comment is FAO-MISC-7. Please see the response to FAO-MISC-7. I-152.40 This comment questions long-term sustainability and environmental stewardship. Please see the responses to FAQ-ENG-9 and FAQ-MISC-11. I-152.41 This comment is FAQ-EJ-6. Please see the response to FAQ-EJ-6. I-152.42 This comment is FAO-EJ-2. Please see the response to FAO-EJ-2.

This comment is FAQ-HAZ-21. Please see the response to FAQ-HAZ-21.

I-152.43

- I-152.44 This comment questions impacts to vulnerable populations. Please see the responses to FAQ-AQ-21 and FAQ-NOI-17.
- **I-152.45** This comment questions impacts to local infrastructure. Please see the responses to FAQ-TRA-18 and FAQ-UTL-7.
- I-152.46 This comment is FAQ-TRA-1. Please see the response to FAQ-TRA-1.
- **I-152.47** This comment is FAQ-PUB-7. Please see the response to FAQ-PUB-7.
- I-152.48 This comment is FAQ-LU-5. Please see the response to FAQ-LU-5.
- **I-152.49** This comment is FAQ-EJ-9. Please see the response to FAQ-EJ-9.
- I-152.50 This comment is FAQ-MISC-1. Please see the response to FAQ-MISC-1.
- **I-152.51** This comment questions the risk of air and water pollution. Please see the responses to FAQ-AQ-18 and FAQ-HYD-26.
- I-152.52 This comment raises general concerns about existing traffic congestion. The project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak-hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant.
- **I-152.53** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-153

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

cathy zmudka <cap10s@hotmail.com>

Mon 7/22/2024 2:02 PM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-153.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	I I-153.2
Are there any endangered species in the project area that could be affected?	I I-153.3
What measures are in place to protect water quality in the surrounding areas?	I I-153.4
Has the potential impact on groundwater been thoroughly assessed?	I I-153.5
Are there any plans to mitigate the project's impact on air quality?	I I-153.6
How will the project affect the overall noise levels in the area?	I I-153.7

What steps will be taken to minimize light pollution from the project?	I I-153.8
Has the project considered the long-term effects on climate change?] 1-153.9
Are there any plans for sustainable energy use in the project?	I-153.10
How will the project impact local traffic patterns and congestion?] -153.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I I-153.12
Has the project considered the potential increase in accidents due to increased traffic?	I I-153.13
Are there any plans to improve public transportation access to the project site?] -153.14
How will the project impact the quality of life for nearby residents?	I I-153.15
What measures are in place to address potential health risks associated with the project?	I I-153.16
Has the project considered the cumulative impact of other nearby developments?	I I-153.17
Are there any plans to address potential environmental justice concerns in the project area?] -153.18
How will the project affect the visual aesthetics of the surrounding area?	I I-153.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-153.20
Has the project considered the impact on property values in the surrounding area?] 1-153.21
What measures are in place to address potential soil contamination from the project?	I I-153.22
How will the project impact the local economy and job market?	I I-153.23
Are there any plans to mitigate the project's impact on local businesses?	I I-153.24
Has the project considered the potential displacement of residents or businesses?	I I-153.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-153.26
How will the project impact the overall community cohesion and social dynamics?	I I-153.27
Are there any plans to address potential gentrification issues in the project area?	I I-153.28
Has the project considered the potential increase in demand for public services?	I I-153.29
What measures are in place to address potential strain on local infrastructure?	I I-153.30
How will the project impact the availability of affordable housing in the area?	I I-153.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-153.32

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How will the project impact the local schools and educational facilities?] -153.33
Has the project considered the potential impact on healthcare services in the area?] -153.34
What measures are in place to address potential emergency response challenges?	I I-153.35
Are there any plans to mitigate the project's impact on nearby recreational areas?] -153.36
How will the project impact the overall sense of community in the area?] -153.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-153.38
What measures are in place to address potential safety hazards from increased air traffic?] -153.39
How will the project impact the local flora and fauna in the area?] -153.40
Are there any plans to mitigate the project's impact on migratory bird populations?	-153.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I-153.42
What measures are in place to address potential water pollution from airport operations?	I -153.43
How will the project impact the overall biodiversity of the area?	I -153.44
Are there any plans to preserve or enhance natural habitats in the project area?	I -153.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I -153.46
What measures are in place to promote sustainable aviation practices?	I I-153.47
How will the project impact the overall carbon footprint of the region?] -153.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?] -153.49
Has the project considered the potential impact of increased aviation activities on local weather patterns?	-153.50
What measures are in place to address potential climate change effects from airport operations?] -153.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I I-153.52

Sincerely,

Cathy Zmudka 19114 Pemberton Place Riverside, CA 92508

Page 3 of 4 in Comment Letter I-153

cap10s@hotmail.com

Sent from my iPad

Page 4 of 4 in Comment Letter I-153

Response to Comment Letter I-153

Cathy Zmudka July 22, 2024

I-153.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-153.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-153.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-153.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-153.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-153.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-153.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-153.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-153.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-153.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-153.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-153.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-153.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-153.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-153.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-153.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-153.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-153.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-153.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-153.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-153.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-153.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-153.23 This comment is FAQ-POP-9. Please see the response to FAQ-POP-9. I-153.24 This comment is FAQ-POP-3. Please see the response to FAQ-POP-3. I-153.25 This comment is FAQ-POP-4. Please see the response to FAQ-POP-4. I-153.26 This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3. I-153.27 This comment is FAQ-LU-3. Please see the response to FAQ-LU-3. I-153.28 This comment is FAO-EJ-7. Please see the response to FAO-EJ-7. I-153.29 This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1. I-153.30 This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4. I-153.31 This comment is FAQ-POP-7. Please see the response to FAQ-POP-7. I-153.32 This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1. I-153.33 This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3. I-153.34 This comment is FAO-PUB-9. Please see the response to FAO-PUB-9. I-153.35 This comment is FAO-PUB-2. Please see the response to FAO-PUB-2. I-153.36 This comment is FAQ-REC-2. Please see the response to FAQ-REC-2. I-153.37 This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAO-MISC-9. I-153.38 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-153.39 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-153.40 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-153.41 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-153.42 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-153.43 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-153.44 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-153.45 This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7. I-153.46 This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- **I-153.47** This comment is recorded as FAQ-ENG-7 and FAQ-GHG-12. Please see the responses to FAQ-ENG-7 and FAQ-GHG-12.
- **I-153.48** This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11.
- **I-153.49** This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- **I-153.50** This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- **I-153.51** This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
- **I-153.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-154

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

David Call <daveandlanacall@sbcglobal.net>

Mon 7/22/2024 10:18 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith, I value this opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEOA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. In addition, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. I have a tremendous number of serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR: How will the project impact the local wildlife and ecosystems? Are there any endangered species in the project area that could be affected? What measures are in place to protect water quality in the surrounding areas? Has the potential impact on groundwater been thoroughly assessed? Are there any plans to mitigate the project's impact on air quality? How will the project affect the overall noise levels in the area? What steps will be taken to minimize light pollution from the project? How will the project impact local traffic patterns and congestion? Has the project considered the potential increase in accidents due to increased traffic? How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? Has the project considered the cumulative impact of other nearby developments? Has the project considered the impact on property values in the surrounding area? What measures are in place to address potential cultural heritage sites in the project area? Has the project considered the potential increase in demand for public services? What measures are in place to address potential strain on local infrastructure? Are there any plans to address potential noise pollution from increased aviation activities? How will the project impact the local schools and educational facilities? What measures are in place to address potential emergency response challenges? Are there any plans to mitigate the project's impact on nearby recreational areas? How will the project impact the overall sense of community in the area? Has the project considered the potential increase in light pollution from the airport operations? What measures are in place to address potential safety hazards from increased air traffic? How will the project impact the local flora and fauna in the area? Are there any plans to mitigate the project's impact on migratory bird populations? Has the project considered the potential disruption to local ecosystems from increased aviation activities? What measures are in place to address potential water pollution from airport operations? How will the project impact the overall biodiversity of the area? What measures are in place to promote sustainable aviation practices? How will the project impact the overall carbon footprint of the region? Are there any plans to offset the project's carbon emissions through environmental initiatives? Has the project considered the potential impact of increased aviation activities on local weather patterns? What measures are in place to address potential climate change effects from airport operations? Thank you for your attention to these critical issues. I eagerly anticipate your response and look forward to further discussion on how we can effectively address these concerns. Sincerely, David Call 154 Mission Grove Pkwy N Riverside Ca 92506 daveandlanacall@sbcglobal.net

1-154.1

1-154.2-3 1-154.4 1-1545 1-154.6-7 1-1548 1-154.9-10 T I-154.11 1-154.12 1-154.13 I-154.14 1-154.15 1-154.16 1-154.17 1-154.18 1-154.19 1-154.20-21 1-154.22 I-154.23 1-154.24 1-154.25-26 1-154.27 1-154.28 1-154.29 1-154.30-31 1-154 32 I-154 33 1-154.34 1-154.35

Response to Comment Letter I-154

David Call July 22, 2024

I-154.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-154.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-154.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-154.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-154.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-154.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-154.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-154.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-154.9	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-154.10	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-154.11	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-154.12	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-154.13	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-154.14	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-154.15	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-154.16	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-154.17	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-154.18	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-154.19	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-154.20	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-154.21	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-154.22	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.

I-154.23 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-154.24 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-154.25 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-154.26 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-154.27 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-154.28 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-154.29 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-154.30 This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10. I-154.31 This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12. I-154.32 This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3. I-154.33 This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4. I-154.34 This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13. I-154.35 This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-155

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Diamond Favors < diamondfavorsbank@gmail.com>

Mon 7/22/2024 3:27 PM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

What specific hazardous materials were historically used, stored, or disposed of at the former March AFB that could impact the project site?

Are there any ongoing monitoring programs in place to track the levels of hazardous materials in the soil, soil gas, and groundwater at the

How will the project address the contamination of chlorinated VOCs, particularly trichloroethylene (TCE), in the soil, soil gas, and

What are the potential health risks associated with exposure to PFOS and PFOA in the soil and groundwater at the project site?

How will the project ensure the safety of workers and future occupants in light of the documented soil, soil gas, and groundwater contamination at Site 7?

Are there any plans in place to mitigate the risks associated with PFAS contamination in the soil and groundwater?

What measures will be taken to prevent the spread of contaminated groundwater during construction activities?

How will the project ensure compliance with federal, state, and local regulations regarding the handling, transport, and disposal of

What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential

Are there any contingency plans in case of accidental release of hazardous materials during construction?

How will the project address the potential safety hazards posed by the expansion and modification of the existing southern access roadway?

What measures are in place to prevent the exposure of people or structures to significant risks of loss, injury, or death involving wildland fires?

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How will the project ensure that hazardous materials are stored, used, and transported in compliance with relevant regulations?	I I-155.14
Are there any plans for the safe removal and disposal of hazardous wastes during construction?	I I-155.15
What role will the California Office of Emergency Services play in overseeing the handling and release of hazardous materials during the project?	1-155.16
How will the project comply with the hazardous substances regulations enforced by the California Occupational Safety and Health Administration?	1-155.17
Are there any specific guidelines in place for the handling of asbestos during construction activities?	I I-155.18
What measures will be taken to ensure the safety of workers exposed to hazardous substances during construction?	I I-155.19
How will the project address the potential risks associated with construction activities near contaminated groundwater wells?	I I-155.20
Are there any plans to monitor and manage contaminated groundwater encountered during excavation activities?	I I-155.21
What procedures will be followed in case of groundwater contamination during construction?	I I-155.22
How will the project ensure that contaminated groundwater is properly managed and treated if encountered during construction?	I I-155.23
What measures are in place to prevent the disturbance of existing treatment systems (e.g., soil vapor extraction systems) during construction?	- I-155.24
How will the project address potential impacts on wildlife, particularly birds, attracted to the project site?	I I-155.25
Are there any specific measures in place to protect wildlife and prevent potential safety risks to aircraft in flight?	I I-155.26
What steps will be taken to incorporate recommendations from the Wildlife Hazard Review into the project design?	I I-155.27
How will the project ensure that noise levels are within acceptable limits for nearby land uses?	I I-155.28
Are there any plans to mitigate noise impacts on nearby residential areas during construction and operation?	I I-155.29
What measures will be taken to reduce noise intrusions upon indoor activities within the project site?	I I-155.30
How will the project comply with the California Building Code requirements for interior environmental comfort regarding noise levels?	I I-155.31
Are there any provisions for providing hearing protection to workers exposed to excessive noise during construction?	I I-155.32
What measures are in place to prevent potential safety hazards that could interfere with aircraft operations?	I I-155.33
How will the project address potential safety risks associated with drainage features and vegetation attracting animals near the active runway?	1-155.34
Are there any specific guidelines for the construction of drainage features and vegetation to minimize safety risks to aircraft?	I I-155.35
What steps will be taken to ensure that the project does not exacerbate existing conditions of hazardous materials on the site?	I I-155.36
How will the project ensure that impacts associated with hazardous materials are controlled and do not have cumulative effects?	I I-155.37
Are there any plans to monitor and address any cumulative impacts of handling, transporting, and disposing of hazardous materials from nearby projects?	1-155.38
What measures will be taken to ensure that the project does not contribute to cumulative hazards in the area?	I I-155.39
How will the project address any potential long-term sustainability issues related to hazardous materials and waste management?] 1-155.40
Are there any plans for ongoing monitoring and maintenance of hazardous materials after the completion of the project?	I I-155.41
What measures will be taken to ensure the long-term safety and health of workers and occupants in relation to hazardous materials?	I -155.42
How will the project ensure compliance with all relevant environmental regulations throughout the project's lifespan?] -155.43

Page 2 of 3 in Comment Letter I-155

Are there any provisions for public access to information regarding hazardous materials used, stored, or disposed of at the project site?	I I-155.44
What steps will be taken to address any unforeseen hazards or risks that may arise during the project's construction and operation?	I _{I-155.45}
How will the project address any potential environmental justice concerns related to hazardous materials and waste management?	I -155.46
Are there any plans in place to involve the local community in decision-making processes regarding hazardous materials and waste management?	I-155.47
What measures will be taken to ensure transparency and accountability in the handling of hazardous materials throughout the project?	I I-155.48
How will the project address any potential conflicts with existing environmental regulations and guidelines?] -155.49
Are there any provisions for regular audits and inspections to ensure compliance with hazardous materials management requirements?	I I-155.50
What steps will be taken to address any gaps or deficiencies in the current hazardous materials management plan?	I I-155.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-155.52

Sincerely,

Diamond Favors 1170 Brasado Way Riverside, CA 92508 Diamondfavorsbank@,gmail.com

Page 3 of 3 in Comment Letter I-155

Response to Comment Letter I-155

Diamond Favors July 22, 2024

I-155.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-155.2	This comment is FAQ-HAZ-58. Please see the response to FAQ-HAZ-58.
I-155.3	This comment is recorded as FAQ-HAZ-71 and FAQ-HYD-24. Please see the responses to FAQ-HAZ-71 and FAQ-HYD-24.
I-155.4	This comment is recorded as FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29. Please see the responses to FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29.
I-155.5	This comment is FAQ-HAZ-78. Please see the response to FAQ-HAZ-78.
I-155.6	This comment is FAQ-HAZ-77. Please see the response to FAQ-HAZ-77.
I-155.7	This comment is recorded as FAQ-HAZ-9 and FAQ-HYD-25. Please see the responses to FAQ-HAZ-9 and FAQ-HYD-25.
l-155.8	This comment is FAQ-HYD-22. Please see the response to FAQ-HYD-22.
l-155.9	This comment is FAQ-HAZ-31. Please see the response to FAQ-HAZ-31.
I-155.10	This comment is a question regarding sensitive receptors. Please see the responses to FAQ-AQ-17, FAQ-HAZ-66, and FAQ-NOI-14.
I-155.11	This comment is FAQ-HAZ-1. Please see the response to FAQ-HAZ-1.
I-155.12	This comment questions the expansion and modification of the existing southern access roadway. Please see the responses to FAQ-HAZ-28 and FAQ-TRA-9.
I-155.13	This comment is FAQ-HAZ-44. Please see the response to FAQ-HAZ-44.
I-155.14	This comment is FAQ-HAZ-34. Please see the response to FAQ-HAZ-34.
I-155.15	This comment is FAQ-HAZ-7. Please see the response to FAQ-HAZ-7.
I-155.16	This comment is FAQ-HAZ-57. Please see the response to FAQ-HAZ-57.
I-155.17	This comment is FAQ-HAZ-29. Please see the response to FAQ-HAZ-29.
l-155.18	This comment is FAQ-HAZ-17. Please see the response to FAQ-HAZ-17.
I-155.19	This comment is FAQ-HAZ-54. Please see the response to FAQ-HAZ-54.
I-155.20	This comment is FAQ-HYD-12. Please see the response to FAQ-HYD-12.

l-155.21	This comment is FAQ-HYD-2. Please see the response to FAQ-HYD-2.
I-155.22	This comment is FAQ-HYD-23. Please see the response to FAQ-HYD-23.
I-155.23	This comment is FAQ-HYD-14. Please see the response to FAQ-HYD-14.
I-155.24	This comment is FAQ-HAZ-43. Please see the response to FAQ-HAZ-43.
I-155.25	This comment is FAQ-BIO-13. Please see the response to FAQ-BIO-13.
I-155.26	This comment is FAQ-BIO-8. Please see the response to FAQ-BIO-8.
I-155.27	This comment is FAQ-BIO-22. Please see the response to FAQ-BIO-22.
I-155.28	This comment is FAQ-NOI-9. Please see the response to FAQ-NOI-9.
I-155.29	This comment is FAQ-NOI-4. Please see the response to FAQ-NOI-4.
I-155.30	This comment is FAQ-NOI-12. Please see the response to FAQ-NOI-12.
I-155.31	This comment is FAQ-NOI-8. Please see the response to FAQ-NOI-8.
I-155.32	This comment is FAQ-NOI-5. Please see the response to FAQ-NOI-5.
I-155.33	This comment is FAQ-HAZ-42. Please see the response to FAQ-HAZ-42.
I-155.34	This comment is FAQ-BIO-14. Please see the response to FAQ-BIO-14.
I-155.35	This comment is FAQ-HAZ-72. Please see the response to FAQ-HAZ-72.
I-155.36	This comment is FAQ-HAZ-62. Please see the response to FAQ-HAZ-62.
I-155.37	This comment is FAQ-HAZ-68. Please see the response to FAQ-HAZ-68.
I-155.38	This comment is FAQ-HAZ-67. Please see the response to FAQ-HAZ-67.
I-155.39	This comment is FAQ-HAZ-69. Please see the response to FAQ-HAZ-69.
I-155.40	This comment is FAQ-HAZ-24. Please see the response to FAQ-HAZ-24.
I-155.41	This comment is FAQ-HAZ-3. Please see the response to FAQ-HAZ-3.
I-155.42	This comment is FAQ-HAZ-52. Please see the response to FAQ-HAZ-52.
I-155.43	This comment is FAQ-HAZ-30. Please see the response to FAQ-HAZ-30.
I-155.44	This comment is FAQ-HAZ-14. Please see the response to FAQ-HAZ-14.
I-155.45	This comment is FAQ-HAZ-61. Please see the response to FAQ-HAZ-61.

I-155.46	This comment is FAQ-HAZ-23. Please see the response to FAQ-HAZ-23.
I-155.47	This comment is FAQ-HAZ-8. Please see the response to FAQ-HAZ-8.
I-155.48	This comment is FAQ-HAZ-55. Please see the response to FAQ-HAZ-55.
l-155.49	This comment is FAQ-PROCESS-5. Please see the response to FAQ-PROCESS-5.
I-155.50	This comment is FAQ-HAZ-70. Please see the response to FAQ-HAZ-70.
I-155.51	This comment is FAQ-HAZ-59. Please see the response to FAQ-HAZ-59.
I-155.52	This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-156

Eden Vitakis

Gale Schulte <gale.schulte@yahoo.com>

Sent: Monday, July 22, 2024 4:05 PM

Jeffrey Smith To:

Subject: Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Consider: 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease. 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentallyharmful, community-focused alternatives. Thank you. Sincerely,

Don Schulte

1-156.1

Don Schulte July 22, 2024

I-156.1 This comment is Form Letter A. As such, please see the Form Letter A Response.

Comment Letter I-157

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Ira and Rajean Long < longfam611@gmail.com>

Mon 7/22/2024 6:49 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-157.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

We have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, we would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	I I-157.2
Are there any endangered species in the project area that could be affected?	I I-157.3
What measures are in place to protect water quality in the surrounding areas?	I I-157.4
Has the potential impact on groundwater been thoroughly assessed?	I I-157.5
Are there any plans to mitigate the project's impact on air quality?	I I-157.6
How will the project affect the overall noise levels in the area?	T 1-157.7

What steps will be taken to minimize light pollution from the project?	I I-157.8
Has the project considered the long-term effects on climate change?	I I-157.9
Are there any plans for sustainable energy use in the project?	I I-157.10
How will the project impact local traffic patterns and congestion?	I I-157.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?] 1-157.12
Has the project considered the potential increase in accidents due to increased traffic?	[1-157.13
Are there any plans to improve public transportation access to the project site?	I I-157.14
How will the project impact the quality of life for nearby residents?] 1-157.15
What measures are in place to address potential health risks associated with the project?	I I-157.16
Has the project considered the cumulative impact of other nearby developments?] 1-157.17
Are there any plans to address potential environmental justice concerns in the project area?	I I-157.18
How will the project affect the visual aesthetics of the surrounding area?] 1-157.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-157.20
Has the project considered the impact on property values in the surrounding area?] -157.21
What measures are in place to address potential soil contamination from the project?	I I-157.22
How will the project impact the local economy and job market?	I I-157.23
Are there any plans to mitigate the project's impact on local businesses?	I I-157.24
Has the project considered the potential displacement of residents or businesses?	I I-157.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-157.26
How will the project impact the overall community cohesion and social dynamics?] 1-157.27
Are there any plans to address potential gentrification issues in the project area?	I I-157.28
Has the project considered the potential increase in demand for public services?	I I-157.29
What measures are in place to address potential strain on local infrastructure?	I I-157.30
How will the project impact the availability of affordable housing in the area?] -157.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-157.32

Page 2 of 3 in Comment Letter I-157

How will the project impact the local schools and educational facilities?	I I-157.33
Has the project considered the potential impact on healthcare services in the area?	I I-157.34
What measures are in place to address potential emergency response challenges?	I I-157.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	I I-157.36
How will the project impact the overall sense of community in the area?	I I-157.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-157.38
What measures are in place to address potential safety hazards from increased air traffic?	I I-157.39
How will the project impact the local flora and fauna in the area?	I I-157.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I I-157.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	-157.42
What measures are in place to address potential water pollution from airport operations?	I I-157.43
How will the project impact the overall biodiversity of the area?	I I-157.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-157.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-157.46
What measures are in place to promote sustainable aviation practices?	I I-157.47
How will the project impact the overall carbon footprint of the region?	I I-157.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I I-157.49
Has the project considered the potential impact of increased aviation activities on local weather patterns?	I-157.50
What measures are in place to address potential climate change effects from airport operations?	1-157.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-157.52

Sincerely,

Ira and Rajean Long 951-961-6646 Riverside, 92506 longfam611@gmail.com

Page 3 of 3 in Comment Letter I-157

Ira and Rajean Long July 22, 2024

I-157.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-157.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-157.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-157.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-157.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-157.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-157.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-157.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-157.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-157.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-157.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-157.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-157.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-157.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-157.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-157.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-157.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-157.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-157.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-157.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-157.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-157.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-157.23 This comment is FAQ-POP-9. Please see the response to FAQ-POP-9. I-157.24 This comment is FAQ-POP-3. Please see the response to FAQ-POP-3. I-157.25 This comment is FAQ-POP-4. Please see the response to FAQ-POP-4. I-157.26 This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3. I-157.27 This comment is FAQ-LU-3. Please see the response to FAQ-LU-3. I-157.28 This comment is FAO-EJ-7. Please see the response to FAO-EJ-7. I-157.29 This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1. I-157.30 This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4. I-157.31 This comment is FAQ-POP-7. Please see the response to FAQ-POP-7. I-157.32 This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1. I-157.33 This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3. I-157.34 This comment is FAO-PUB-8. Please see the response to FAO-PUB-8. I-157.35 This comment is FAO-PUB-2. Please see the response to FAO-PUB-2. I-157.36 This comment is FAQ-REC-2. Please see the response to FAQ-REC-2. I-157.37 This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAO-MISC-9. I-157.38 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-157.39 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-157.40 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-157.41 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-157.42 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-157.43 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-157.44 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-157.45 This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7. I-157.46 This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- **I-157.47** This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
- **I-157.48** This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
- **I-157.49** This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- **I-157.50** This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- **I-157.51** This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- **I-157.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-158

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Jaylen Favors <jaylenfavorrs@gmail.com>

Mon 7/22/2024 3:26 PM

To:+CBFCentury@aol.com <+CBFCentury@aol.com>;Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any projectrelated technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove. Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR: How will the project impact the local wildlife and ecosystems? Are there any endangered species in the project area that could be affected? What measures are in place to protect water quality in the surrounding areas? Has the potential impact on groundwater been thoroughly assessed? Are there any plans to mitigate the project's impact on air quality? How will the project affect the overall noise levels in the area? What steps will be taken to minimize light pollution from the project? Has the project considered the long-term effects on climate change? Are there any plans for sustainable energy use in the project? How will the project impact local traffic patterns and congestion? What measures are in place to ensure the safety of pedestrians and cyclists in the area? Has the project considered the potential increase in accidents due to increased traffic? Are there any plans to improve public transportation access to the project site? How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? Has the project considered the cumulative impact of other nearby developments? Are there any plans to address potential environmental justice concerns in the project area? How will the project affect the visual aesthetics of the surrounding area? Are there any plans to preserve or enhance the natural beauty of the project site? Has the project considered the impact on property values in the surrounding area? What measures are in place to address potential soil contamination from the project? How will the project impact the local economy and job market? Are there any plans to mitigate the project's impact on local businesses? Has the project considered the potential displacement of residents or businesses? What measures are in place to address potential cultural heritage sites in the project area? How will the project impact the overall community cohesion and social dynamics? Are there any plans to address potential gentrification issues in the project area? Has the project considered the potential increase in demand for public services? What measures are in place to address potential strain on local infrastructure? How will the project impact the availability of affordable housing in the area? Are there any plans to address potential noise pollution from increased aviation activities? How will the project impact the local schools and educational facilities? Has the project considered the potential impact on healthcare services in the area? What measures are in place to address potential emergency response challenges? Are there any plans to mitigate the project's impact on nearby recreational areas? How will the project impact the overall sense of community in the area? Has the project considered the potential increase in light pollution from the airport operations? What measures are in place to address potential safety hazards from increased air traffic? How will the project impact the local flora and fauna in the area? Are there any plans to mitigate the project's impact on migratory bird populations? Has the project considered the potential disruption to local ecosystems from increased aviation activities? What measures are in place to address potential water pollution from airport operations? How will the project impact the overall biodiversity of the area? Are there any plans to preserve or enhance natural habitats in the project area? Has the project considered the potential increase in greenhouse gas emissions from airport operations? What measures are in place to promote sustainable aviation practices? How will the project impact the overall carbon footprint of the region? Are there any plans to offset the project's carbon emissions through environmental initiatives? Has the project considered the potential impact of increased aviation activities on local weather patterns? What measures are in place to address potential climate change effects from airport operations? Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns. Sincerely, Jaylen Favors 9518974184, 1170 Brasado Way Riverside California, jaylenfavorrs@gmail.com

I-158.1

I 1-158.2 I I-158.3-4 I 1-158.5-6 I 1-158.7-8 T I-158 9-10 I I-158.11-12 I 1-158.13-14 I 1-158.15-16 I I-158.17-18 I 1-158.19 I I-158.20-21 I |-158.22-23 I 1-158.24-25 I I-158.26 I I-158 27-28 I 1-158.29 T I-158 30-31 I I-158.32 T I-158 33-34 I |-158.35-36 I I-158.37-38 I I-158.39 I I-158.40-41 T I-158 42 I 1-158.43-44 I I-158.45 I 1-158.46-48 I 1-158.49

I I-158.50-51

I I-158.52

Jaylen Favors July 22, 2024

I-158.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-158.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-158.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-158.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-158.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-158.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-158.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-158.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-158.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-158.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-158.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-158.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-158.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-158.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-158.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-158.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-158.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-158.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-158.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-158.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-158.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-158.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-158.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-158.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-158.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-158.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-158.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-158.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-158.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-158.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-158.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-158.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-158.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-158.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-158.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-158.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-158.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-158.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-158.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-158.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-158.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-158.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-158.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-158.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-158.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-158.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-158.47	This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
I-158.48	This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
I-158.49	This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-158.50	This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-158.51	This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
I-158.52	This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-159

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Ira and Rajean Long < longfam611@gmail.com>

Mon 7/22/2024 6:52 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

I-159.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the proposed project impact local wildlife habitats and biodiversity?	I-159.2
Has the report thoroughly assessed the potential noise pollution from the project or areas?	n nearby residential
What measures are in place to mitigate the impact of increased traffic congestion in area?	the surrounding I-159.4
Are there any plans to address the potential increase in air pollution resulting from t	the project?
How will the project affect the quality of water sources in the vicinity?	I I-159.6

Has the report considered the long-term effects of the project on the local climate and microclimate?	I-159.7
What steps will be taken to minimize light pollution from the project's operations?	1-159.8
How will the project impact the visual aesthetics of the surrounding area?	1-159.9
Are there any plans to address the potential disruption of local ecosystems caused by the project?	1-159.10
Has the report thoroughly assessed the risk of soil contamination from construction activities?] 1-159.11
What measures are in place to prevent soil erosion during and after construction?] -159.12
How will the project impact the availability of green spaces and recreational areas in the community?	-159.13
Are there any plans to mitigate the potential loss of agricultural land due to the project?	-159.14
Has the report considered the impact of the project on groundwater resources in the area?	1-159.15
What measures are in place to ensure the safety of nearby residents in case of emergencies related to the project?	-159.16
How will the project affect the overall air quality in the region?	-159.17
Are there any plans to address the potential increase in greenhouse gas emissions resulting from the project?	-159.18
Has the report thoroughly assessed the risk of wildfires in the area due to the project?	-159.19
What measures are in place to protect local water bodies from pollution during and after construction?	I I-159.20
How will the project impact the local flora and fauna species, especially those that are endangered or protected?	-159.21
Are there any plans to address the potential displacement of wildlife habitats caused by the project?] -159.22
Has the report considered the impact of the project on nearby wetlands and waterways?	-159.23
What measures are in place to ensure the safe disposal of hazardous materials used during construction and operation?	I-159.24
How will the project impact the overall health and well-being of the local community?	1-159.25
Are there any plans to address the potential increase in waste generation resulting from the project?] 1-159.26
Has the report thoroughly assessed the risk of landslides in the area due to the project?	I-159.27
What measures are in place to protect the local population from exposure to harmful chemicals or pollutants?	I -159.28

Page 2 of 4 in Comment Letter I-159

How will the project impact the availability of affordable housing in the region?	I I-159.29
Are there any plans to address the potential gentrification of the area due to the project?	I I-159.30
Has the report considered the impact of the project on the cultural heritage and historical sites in the vicinity?	I-159.31
What measures are in place to ensure the project complies with all relevant environmental regulations and standards?	I-159.32
How will the project impact the local economy, including job creation and income generation?	I-159.33
Are there any plans to address the potential increase in light and noise pollution from the project's operations?	1-159.34
Has the report thoroughly assessed the risk of flooding in the area due to the project?	I -159.35
What measures are in place to protect the local population from the spread of diseases or health hazards associated with the project?	1-159.36
How will the project impact the availability of public transportation and infrastructure in the region?	I-159.37
Are there any plans to address the potential strain on public services and utilities caused by the project?	I I-159.38
Has the report considered the impact of the project on property values and real estate in the surrounding area?	1-159.39
What measures are in place to ensure the project's long-term sustainability and environmental stewardship?	I-159.40
How will the project impact the overall livability and quality of life for residents in the community?] -159.41
Are there any plans to address the potential social inequalities or disparities that may arise from the project?	I-159.42
Has the report thoroughly assessed the risk of soil contamination from hazardous waste disposal related to the project?	1-159.43
What measures are in place to protect vulnerable populations, such as children and the elderly, from the project's negative impacts?	1-159.44
How will the project impact the local infrastructure, including roads, bridges, and utilities?	I I-159.45
Are there any plans to address the potential increase in traffic accidents and road safety issues resulting from the project?	-159.46
Has the report considered the impact of the project on nearby schools, hospitals, and other essential services?	1-159.47

Page 3 of 4 in Comment Letter I-159

What measures are in place to ensure the project's compliance with all relevant regulations?	zoning and land use I I-159.48
How will the project impact the overall social cohesion and community well-bei	ng in the area? $\qquad \qquad
Are there any plans to address the potential loss of community cohesion and se the project?	ense of belonging due to I-159.50
Has the report thoroughly assessed the risk of air and water pollution from the	project's operations?
Thank you for your attention to these critical issues. I look forward to your responsions on how we can effectively address these concerns.	onse and further I-159.52

Sincerely,

Ira Long 951-961-6646 Riverside, 92506

Page 4 of 4 in Comment Letter I-159

Ira Long July 22, 2024

I-159.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-159.2	This comment is FAQ-BIO-19. Please see the response to FAQ-BIO-19.
I-159.3	This comment is FAQ-NOI-6. Please see the response to FAQ-NOI-6.
I-159.4	This comment is FAQ-TRA-17. Please see the response to FAQ-TRA-17.
I-159.5	This comment is FAQ-AQ-1. Please see the response to FAQ-AQ-1.
I-159.6	This comment is FAQ-HYD-13. Please see the response to FAQ-HYD-13.
I-159.7	This comment questions impacts to local climate and microclimate. Please see the responses to FAQ-AQ-6 and FAQ-GHG-9.
I-159.8	This comment is FAQ-AES-13. Please see the response to FAQ-AES-13.
I-159.9	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-159.10	This comment is FAQ-BIO-4. Please see the response to FAQ-BIO-4.
I-159.11	This comment questions the risk of soil contamination. Please see the responses to FAQ-GEO-4 and FAQ-HAZ-20.
I-159.12	This comment is FAQ-GEO-8. Please see the response to FAQ-GEO-8.
I-159.13	This comment is FAQ-REC-4. Please see the response to FAQ-REC-4.
I-159.14	This comment is FAQ-AG-1. Please see the response to FAQ-AG-1.
I-159.15	This comment is FAQ-HYD-6. Please see the response to FAQ-HYD-6.
I-159.16	This comment is FAQ-HAZ-41. Please see the response to FAQ-HAZ-41.
I-159.17	This comment is FAQ-AQ-9. Please see the response to FAQ-AQ-9.
I-159.18	This comment is FAQ-GHG-2. Please see the response to FAQ-GHG-2.
I-159.19	This comment is FAQ-FIRE-1. Please see the response to FAQ-FIRE-1.
I-159.20	This comment is FAQ-HYD-19. Please see the response to FAQ-HYD-19.
I-159.21	This comment is FAQ-BIO-16. Please see the response to FAQ-BIO-16.

I-159.22 This comment is FAQ-BIO-2. Please see the response to FAQ-BIO-2. I-159.23 This comment questions impacts to nearby wetlands and waterways. Please see the responses to FAQ-BIO-12 and FAQ-HYD-9. I-159.24 This comment is FAQ-HAZ-40. Please see the response to FAQ-HAZ-40. I-159.25 This comment is FAQ-EJ-5. Please see the response to FAQ-EJ-5. I-159.26 This comment is FAQ-UTL-2. Please see the response to FAQ-UTL-2. I-159.27 This comment is FAQ-GEO-2. Please see the response to FAQ-GEO-2. 1-159.28This comment is FAQ-HAZ-47. Please see the response to FAQ-HAZ-47. I-159.29 This comment is FAO-POP-8. Please see the response to FAO-POP-8. I-159.30 This comment is FAQ-EJ-8. Please see the response to FAQ-EJ-8. I-159.31 This comment is FAQ-CUL-2. Please see the response to FAQ-CUL-2. I-159.32 This comment is FAQ-PROCESS-10. Please see the response to FAQ-PROCESS-10. I-159.33 This comment is FAO-POP-11. Please see the response to FAO-POP-11. I-159.34 This comment questions light and noise pollution. Please see the response to FAQ-AES-14 and FAO-NOI-15. I-159.35 This comment is FAQ-HYD-11. Please see the response to FAQ-HYD-11. I-159.36 This comment is FAQ-MISC-12. Please see the response to FAQ-MISC-12. I-159.37 This comment is FAQ-TRA-11. Please see the response to FAQ-TRA-11. I-159.38 This comment questions impacts to public services and utilities. Please see the responses to FAQ-PUB-6 and FAQ-UTL-8. I-159.39 This comment is FAO-MISC-7. Please see the response to FAO-MISC-7. I-159.40 This comment questions long-term sustainability and environmental stewardship. Please see the responses to FAQ-ENG-9 and FAQ-MISC-11. I-159.41 This comment is FAQ-EJ-6. Please see the response to FAQ-EJ-6. 1-159.42This comment is FAO-EJ-2. Please see the response to FAO-EJ-2. I-159.43 This comment is FAQ-HAZ-21. Please see the response to FAQ-HAZ-21.

- I-159.44 This comment questions air and noise pollution. Please see the responses to FAQ-AQ-21 and FAQ-NOI-17.
 I-159.45 This comment questions impacts to local infrastructure. Please see the responses to FAQ-TRA-18 and
- FAQ-UTL-7.
- I-159.46 This comment is FAQ-TRA-1. Please see the response to FAQ-TRA-1.
- **I-159.47** This comment is FAQ-PUB-7. Please see the response to FAQ-PUB-7.
- **I-159.48** This comment is FAQ-LU-5. Please see the response to FAQ-LU-5.
- **I-159.49** This comment is FAQ-EJ-9. Please see the response to FAQ-EJ-9.
- **I-159.50** This comment is FAQ-MISC-1. Please see the response to FAQ-MISC-1.
- **I-159.51** This comment questions air and water pollution. Please see the responses to FAQ-AQ-18 and FAQ-HYD-26.
- **I-159.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Comment Letter I-160

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Jennifer Becker < Jennifer. Becker@ucr.edu>

Mon 7/22/2024 9:22 AM

To:Jeffrey Smith <smith@marchjpa.com> Cc:Catherine Barrett-Fischer <cbfcentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

1-160.1

The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. The noise nuisance to these neighborhoods created by air cargo operations at MARB is well-documented and indisputable. As with all scientific analysis, the actual data must take precedence over computer generated models in drawing conclusions about potential impacts of the proposed project.

1-160.2

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Statements were made regarding the number of people expected to be disturbed by noise without any citation or scientific support. The draft EIR is full of opinions that are not substantiated by any data. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I-160.3 I-160.4

I have serious concerns about the influence of this project on the community, and its effect on the quality of life for the residents in the area.

1-160.5

Sincerely,

Jennifer Becker Riverside, CA 92506 jennifer.becker@ucr.edu

Jennifer Becker July 22, 2024

- I-160.1 This comment is paragraphs 1-3 of the FAQ Introduction. As such, please see the FAQ Introduction Response.
- 1-160.2This comment alleges air cargo noise nuisance at March ARB "is well-documented and indisputable" and suggests "actual data must take precedence over computer generated models." It is not clear what "actual data" the comment refers to but may be referring to the 2005-2008 DHL air cargo flights. which are no longer operating. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.¹²² As of 2024, there were fewer than 20 DC-9s still in service.¹²³ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project. 124 The Proposed Project is separate from the DHL air cargo operations. Because there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane used in air cargo operations. Hence, noise emission levels from this aircraft type, as established in the AEDT (version 3e) aviation noise prediction software, has been used to inform aviation noise assessment attributed to Proposed Project cargo flights, as analyzed in Section 3.11, Noise, of the EIR.
- I-160.3 This comment is the first sentence of paragraph 4 of the FAQ Introduction. As such, please see FAQ Introduction Response.
- I-160.4 This comment asserts that "statements were made regarding the number of people expected to be disturbed by noise without any citation or scientific support." Section 3.11, Noise, of the EIR relies on the Project Noise Impact Analysis (Appendix L-1), which supports statistics with Noise Effects Handbook - A Desk Reference to Health and Welfare Effects of Noise by the EPA Office of Noise Abatement and Control (revised 1981).125 Further, as explained in the 2018 FTA Transit Noise and Vibration Impact Assessment Manual:126

In 1978, Theodore J. Schultz, an internationally known acoustical scientist, synthesized the results of a large number of social surveys concerning annoyance due to transportation noise. A group of these surveys were remarkably consistent, and the author proposed that their average results be taken as the best available prediction of transportation noise annoyance. This synthesis has received essentially unanimous acceptance by acoustical scientists and engineers. The "universal" transportation response curve developed by Schultz (Figure 3-7) shows that the percent of the population highly annoyed by transportation noise increases from zero at an Ldn of approximately 50 dBA to 100% when L_{dn} is approximately 90 dBA. Most importantly,

https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

¹²³ https://simpleflying.com/dc-9-operators-2024/

¹²⁴ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

U.S. Environmental Protection Agency Office of Noise Abatement and Control. Noise Effects Handbook: A Desk Reference to Health and Welfare Effects of Noise. October 1979 (revised July 1981). EPA 550/9/82/106.

¹²⁶ Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual*. September 2018.

this curve indicates that for the same increase in L_{dn} , there is a greater increase in the number of people highly annoyed at high noise levels than at low noise levels. For example, a 5 dB increase at low ambient levels (40–50 dB) has less impact than at higher ambient levels (65–75 dB). A recent update of the original research containing several railroad, transit, and street traffic noise surveys, confirmed the shape of the original Schultz curve.

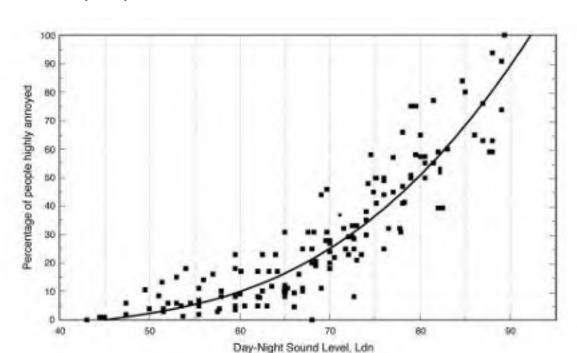


Figure 3-7. Community Annoyance Due to Noise

Figure 3-7 Community Annoyance Due to Noise

The EIR acknowledges that 10% of the population "has a very low tolerance for noise" and is thus likely very sensitive to noise and will correspondingly react. Regarding the quarter of the population that may not complain even under severe noise environments, the universal Schultz curve appearing above shows that up to 75% of a population would be highly annoyed (and thus likely to react) at an exterior noise level of about 87 dBA, but a remaining 25% of the population would not be highly annoyed and may thus not react. Section 4.1 of Appendix L-2 (i.e., the Sleep Disturbance study) of the EIR describes the methodology underpinning the sleep disturbance probability predictions, based on cited usage of AEDT 3e software and its inclusion of U.S. 2020 Census population data, leading to sound exposure level and CNEL contour areas and corresponding population exposures, as presented in Appendix L-2 Table 1 and under Section 4.2. This comment generally claims the EIR contains "opinions that are not substantiated by any data" but does not identify any specific concerns.

I-160.5 This comment is the second sentence of paragraph 4 and paragraph 5 of the FAQ Introduction. As such, please see the FAQ Introduction Response.

Comment Letter I-161

1-161.1

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

janetrvrsd <janetrvrsd@aol.com>

Mon 7/22/2024 7:46 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?	I I-161.2
Are there any plans to monitor and report on air quality data in real-time?	I I-161.3
Has the project considered the potential health risks associated with poor air quality?	I I-161.4
What measures are in place to address potential respiratory issues from increased air pollution?	I I-161.5
How will the project impact the overall noise levels in the region?	I I-161.6
Are there any plans to implement noise mitigation strategies for affected communities?	I I-161.7
Has the project considered the potential disruption to local wildlife from increased noise pollution?	I I-161.8
What measures are in place to address potential sleep disturbances from airport operations?	I I-161.9
How will the project impact the overall light pollution in the region?	I I-161.10
Are there any plans to implement dark sky initiatives to reduce light pollution?	I I-161.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?	I I-161.12
What measures are in place to address potential light trespass issues for nearby residents?	I I-161.13
How will the project impact the overall water quality in the region?	I I-161.14
Are there any plans to prevent water contamination from airport operations?	I -161.15
Has the project considered the potential runoff and drainage issues from the project site?	I 1-161.16

DECEMBER 2025

What measures are in place to address potential water scarcity concerns in the area?	I I-161.17
How will the project impact the overall soil quality in the region?	I I-161.18
Are there any plans to prevent soil erosion and degradation from construction activities?	I I-161.19
Has the project considered the potential contamination of soil from hazardous materials?	I I-161.20
What measures are in place to address potential soil remediation needs in the area?	I I-161.21
How will the project impact the overall traffic congestion in the region?	I I-161.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?	I I-161.23
Has the project considered the potential increase in accidents from congested roadways?	I I-161.24
What measures are in place to address potential traffic management challenges?	I I-161.25
How will the project impact the overall public transportation system in the region?	I I-161.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-161.27
Has the project considered the potential strain on public transportation services?	I I-161.28
What measures are in place to address potential accessibility issues for public transit users?	I I-161.29
How will the project impact the overall community health and safety in the region?	I I-161.30
Are there any plans to promote healthy living initiatives for residents in the area?	I I-161.31
Has the project considered the potential health risks associated with increased pollution?	I I-161.32
What measures are in place to address potential emergency response needs for the community?	I I-161.33
How will the project impact the overall community resilience to environmental hazards?	I I-161.34
Are there any plans to implement disaster preparedness programs for the community?	I I-161.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-161.36
What measures are in place to address potential public health crises in the region?	I I-161.37
How will the project comply with local, state, and federal environmental regulations?	I I-161.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I I-161.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-161.40
What measures are in place to address potential regulatory violations during the project?	I I-161.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-161.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I I-161.43
Has the project considered the potential need for adaptive management strategies?	T I-161.44
What measures are in place to promote environmental education and awareness in the community?	_ I -161.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-161.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	_ I -161.47
Has the project considered the potential need for independent environmental audits and reviews?	I I-161.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I -161.49

Page 2 of 3 in Comment Letter I-161

How will the project address any unforeseen environmental challenges or emergencies?

I I-161.50

Are there any plans to establish a contingency fund for environmental mitigation efforts?

I -161.51

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

| 1-161.52

Sincerely, Janet Marie Christie 19517803047 6848 Rycroft Dr Janetryrsd@aol.com

[Your Full Name] [Your Contact Information] [Your Address] [Your Email Address]

Sent from my Verizon, Samsung Galaxy smartphone

Page 3 of 3 in Comment Letter I-161

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Janet Marie Christie July 22, 2024

I-161.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-161.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-161.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-161.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-161.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-161.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-161.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-161.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-161.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-161.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-161.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-161.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-161.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-161.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-161.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-161.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-161.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-161.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-161.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-161.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-161.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-161.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

- **I-161.23** This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4.
- **I-161.24** This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6.
- **I-161.25** This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15.
- **I-161.26** This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12.
- **I-161.27** This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2.
- I-161.28 This comment is FAO-TRA-7. Please see the response to FAO-TRA-7.
- **I-161.29** This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14.
- **I-161.30** This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9.
- **I-161.31** This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3.
- **I-161.32** This comment is recorded as FAQ-AQ-4 and FAQ-HAZ-73. Please see the responses to FAQ-AQ-4 and FAQ-HAZ-73.
- I-161.33 This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4.
- **I-161.34** This comment is FAQ-HAZ-35. Please see the response to FAQ-HAZ-35.
- I-161.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10.
- I-161.36 This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6.
- I-161.37 This comment is FAO-MISC-10. Please see the response to FAO-MISC-10.
- I-161.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7.
- I-161.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1.
- I-161.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4.
- **I-161.41** This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9.
- I-161.42 This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11.
- I-161.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3.
- **I-161.44** This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5.
- **I-161.45** This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

- I-161.46 This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8.
- I-161.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2.
- **I-161.48** This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6.
- **I-161.49** This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12.
- **I-161.50** This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5.
- **I-161.51** This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2.
- **I-161.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Comment Letter I-162

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

janetrvrsd <janetrvrsd@aol.com>

Mon 7/22/2024 7:44 AM

 $\label{to:composition} To: Jeffrey\ Smith\ < smith\ @marchjpa.com\ >; CBFCentury\ @aol.com\ < CBFCentury\ @aol.com\ >;

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-162.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	1 1-162.2
Are there any endangered species in the project area that could be affected?	I 1-162.3
What measures are in place to protect water quality in the surrounding areas?	I I-162.4
Has the potential impact on groundwater been thoroughly assessed?	I 1-162.5
Are there any plans to mitigate the project's impact on air quality?	I I-162.6
How will the project affect the overall noise levels in the area?	I I-162.7
What steps will be taken to minimize light pollution from the project?	I I-162.8
Has the project considered the long-term effects on climate change?	I I-162.9
Are there any plans for sustainable energy use in the project?	I -162.10
How will the project impact local traffic patterns and congestion?	I I-162.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I -162.12
Has the project considered the potential increase in accidents due to increased traffic?	I I-162.13
Are there any plans to improve public transportation access to the project site?	I I-162.14
How will the project impact the quality of life for nearby residents?	I I-162.15
What measures are in place to address potential health risks associated with the project?	I -162.16

Has the project considered the cumulative impact of other nearby developments?	I I-162.17
Are there any plans to address potential environmental justice concerns in the project area?	I I-162.18
How will the project affect the visual aesthetics of the surrounding area?	I I-162.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-162.20
Has the project considered the impact on property values in the surrounding area?	I I-162.21
What measures are in place to address potential soil contamination from the project?	I I-162.22
How will the project impact the local economy and job market?	I I-162.23
Are there any plans to mitigate the project's impact on local businesses?	I I-162.24
Has the project considered the potential displacement of residents or businesses?	I I-162.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-162.26
How will the project impact the overall community cohesion and social dynamics?	I I-162.27
Are there any plans to address potential gentrification issues in the project area?	I -162.28
Has the project considered the potential increase in demand for public services?	I I-162.29
What measures are in place to address potential strain on local infrastructure?	I I-162.30
How will the project impact the availability of affordable housing in the area?	I I-162.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-162.32
How will the project impact the local schools and educational facilities?	I I-162.33
Has the project considered the potential impact on healthcare services in the area?	I I-162.34
What measures are in place to address potential emergency response challenges?	I I-162.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	I I-162.36
How will the project impact the overall sense of community in the area?	I I-162.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-162.38
What measures are in place to address potential safety hazards from increased air traffic?	I I-162.39
How will the project impact the local flora and fauna in the area?	I I-162.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I I-162.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I I-162.42
What measures are in place to address potential water pollution from airport operations?	I I-162.43
How will the project impact the overall biodiversity of the area?	I I-162.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-162.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-162.46
What measures are in place to promote sustainable aviation practices?	I I-162.47
How will the project impact the overall carbon footprint of the region?	I I-162.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I I-162.49

Page 2 of 3 in Comment Letter I-162

Has the project considered the potential impact of increased aviation activities on local weather patterns?

I -162.50

What measures are in place to address potential climate change effects from airport operations?

I I-162.51

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

1-162.52

Sincerely,
Janet Marie Christie
19517803047
6848 Rycroft Dr.
Janetrvrsd@aol.com
[Your Full Name]
[Your Contact Information]
[Your Address]
[Your Email Address]

Sent from my Verizon, Samsung Galaxy smartphone

Page 3 of 3 in Comment Letter I-162

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Response to Comment Letter I-162

Janet Marie Christie July 22, 2024

I-162.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-162.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-162.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-162.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-162.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-162.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-162.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-162.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-162.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-162.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-162.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-162.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-162.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-162.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-162.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-162.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-162.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-162.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-162.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-162.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-162.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-162.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-162.23 This comment is FAQ-POP-9. Please see the response to FAQ-POP-9. I-162.24 This comment is FAQ-POP-3. Please see the response to FAQ-POP-3. I-162.25 This comment is FAQ-POP-4. Please see the response to FAQ-POP-4. I-162.26 This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3. I-162.27 This comment is FAQ-LU-3. Please see the response to FAQ-LU-3. I-162.28 This comment is FAO-EJ-7. Please see the response to FAO-EJ-7. I-162.29 This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1. I-162.30 This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4. I-162.31 This comment is FAQ-POP-7. Please see the response to FAQ-POP-7. I-162.32 This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1. I-162.33 This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3. I-162.34 This comment is FAO-PUB-8. Please see the response to FAO-PUB-8. I-162.35 This comment is FAO-PUB-2. Please see the response to FAO-PUB-2. I-162.36 This comment is FAQ-REC-2. Please see the response to FAQ-REC-2. I-162.37 This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAO-MISC-9. I-162.38 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-162.39 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-162.40 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-162.41 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-162.42 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-162.43 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-162.44 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-162.45 This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7. I-162.46 This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- **I-162.47** This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
- **I-162.48** This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
- **I-162.49** This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- **I-162.50** This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- **I-162.51** This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- **I-162.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-163

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Jill Menez <jillmenez99@gmail.com>

Mon 7/22/2024 11:55 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

On behalf of Perris Neighbors in Action, I am emailing in opposition to this ill-conceived project.

T I-163.1

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

163.2

As a community advocate and a resident of Perris, I am a first hand witness to the many projects like this one which get pushed through approval against the wishes of the community. We are already inundated with excessive truck and plane traffic which negatively impacts the community's health and safety. This is not an environmentally sound project and it needs to be heavily reconsidered and denied.

1-163.3

I would like to echo my neighbors and colleagues concerns and I urge you to consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

1-163.4

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Jillian Menez Perris Neighbors in Action 92570 II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Response to Comment Letter I-163

Jillian Menez July 22, 2024

- **I-163.1** This comment expresses general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-163.2 This comment is paragraph 1 of Form Letter A. As such, please see Form Letter A Response.
- I-163.3 This comment characterizes existing truck and plane traffic as excessive and provides general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-163.4** This comment is the remainder of Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-164

I-164.1

1-164.2

I-164.3

1-164.4

1-164.5

Use of March Reserve Base for commercial cargo flights

Jennifer Cress < jenmorehead@sbcglobal.net>

Mon 7/22/2024 10:08 AM

To:Conder, Chuck <cconder@riversideca.gov>;district5@rivco.org <district5@rivco.org>;district1@rivco.org <district1@rivco.org>;jperry@riversideca.gov <jperry@riversideca.gov>;rogers@cityofperris.org <rogers@cityofperris.org <rogers@cityofperris.org>;mvargas@cityofperris.org <mvargas@cityofperris.org <mv

Respected Leaders of the Inland Empire,

I'm writing today to plead with you to halt any progress toward converting part of March Air Reserve Base into a commercial cargo airport. I am a native of Riverside, and I have always been proud that March Field is such an important part of the culture of the Inland Empire. I grew up with many Air Force families.

Just a few days ago, I was made aware of possible plans to convert a large part of March into a commercial air field. Please do not allow the legacy of March to be that of an entity that degraded the quality of life for all of the residents that surround the air field. The proposed commercial ventures would greatly increase air and noise pollution.

As March Air Reserve Base is to be the official home to the next generation of tanker planes, March is not in danger of closure. The unemployment rate in the Inland Empire is commensurate with the national average; the promise of jobs brought to the area by the commercialization of March should not outweigh the health of existing residents.

Please use your roles as leaders of our community to look at the longterm costs of adding so many flights and the addition of even more truck traffic to our community.

With best regards, Jennifer Morehead II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Response to Comment Letter I-164

Jennifer Cress July 22, 2024

- **I-164.1** This is a general introductory comment expressing opposition to the Proposed Project. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- This comment alleges the Proposed Project involves "convert[ing] a large part of March into a commercial air field." March ARB/Inland Port Airport is a joint use airport with up to 21,000 civilian flight operations authorized under the Joint Use Agreement. There are currently approximately 5,000 civilian flight operations annually. The airport covers over 2,000 acres. The Proposed Project involves only 46 acres. The comment raises general concerns regarding air quality and noise. Air quality and noise impacts are addressed in Section 3.2, Air Quality, and Section 3.11, Noise, of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- **I-164.3** This comment states March ARB is not in danger of closure. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-164.4 This comment provides general opposition to the Proposed Project in relation to increasing employment in exchange for public health. Section 3.2, Air Quality, of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13, the Proposed Project would not exceed the SCAQMD LSTs during construction with the incorporation of MM-AQ-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14, the Proposed Project would not exceed the SCAQMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Proposed Project construction and operation. The Project Health Risk Assessment (Appendix C-1) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from Proposed Project construction with the incorporation of MM-AQ-1 or from Proposed Project operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-164.5 This comment raises general concerns regarding the Proposed Project, including increased truck traffic. The project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak-hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Comment Letter I-165

Re: Community Meeting: Meridian D-1 Gateway Aviation Center Project

Jerry Shearer Jr. <jsydor@yahoo.com>

Mon 7/22/2024 8:24 AM

To:Jeffrey Smith <smith@marchjpa.com>;Cindy Camargo <camargo@marchjpa.com>
Cc:Catherine Barrett-Fischer <cbfcentury@aol.com>;Michael McCarthy <mikem@radicalresearch.llc>;Christopher Bardeen <christob@ucr.edu>;Kerry Hanson <kerryh@ucr.edu>

Hello again Mr. Smith,

I wanted to let you know that yesterday afternoon, another Amazon aircraft flew directly over my house at relatively low altitude, and I live well outside of the flight path. I imagine the take-off was altered due to smoke from a nearby fire but that makes two Amazon aircraft flying over my house during the day this month, regardless of the circumstances of their departures. The March JPA, in its rush to maximize warehousing in this region, have no control over the type and frequency of noise disturbances like these flights, despite your assurances they will not happen. I ask the JPA to scrap the Aviation project plan and investigate non-industrial alternatives for this site. I also ask that this email string be included as public comment to the draft EIR. Please feel free to pass this report on to whoever at the airport/FAA should know about the Amazon planes.

1-165.1

I-165.2

I-165.3

I-165.4

1-165.5

Thank you.

Jerry Shearer

On Monday, July 1, 2024 at 04:14:41 PM PDT, Jerry Shearer Jr. <jsydor@yahoo.com> wrote:

Hello Jeffrey,

I will try to make the meeting tonight but in case I am not able to I wanted to share a story from today with you and the JPA. I live in an OrangeCrest neighborhood that roughly parallels the runway for March ARB. Typically the military will fly directly over my house 10-20 times a day at low altitude, but rarely does a commercial flight do that. Today an Amazon flight made a steep ascent on take off and banked over my neighborhood. This is a significant deviation from their standard flight path and is an example of a risk and impact to human life and property that will only increase with the project you are presenting tonight. I am sure there is a reason for the FAA to allow for deviations in arrival and departure paths from time to time but this one stood out as unusual today. I was mowing my lawn and didn't have a phone on me to film it but I wish I had. When the community is angry over this project it is because the unexpected does happen and flights will inevitably go directly over people's homes from time to time, and no one wants to live directly under a flight path more than one must.

1-165.6

Thank you for your time today.

Jerry Shearer 92508

On Tuesday, June 25, 2024 at 11:00:13 AM PDT, Jeffrey Smith <smith@marchjpa.com> wrote:

Good Morning,

The March Joint Powers Authority is hosting a second Community Meeting for the Meridian D-1 Gateway Aviation Center Project, Monday, July 1, 2024, 6:00 pm – 8:30 pm.

The proposed Meridian D-1 Gateway Aviation Center Project consists of an Air Cargo Center Component and Off-Site Component located on approximately 46 acres. Join us to learn more about the proposed Project.

Please see the attached notice for more information.

Thank you.



Jeffrey M. Smith, AICP

Principal Planner

March Joint Powers Authority

14205 Meridian Parkway, Suite 140

Riverside, CA 92518

Phone: (951) 656-7000

Cell: (951) 807-7283

Fax: (951) 653-5558

Email: smith@marchjpa.com
Web: www.marchjpa.com

PLEASE VISIT <u>WWW.MARCHJPA.COM</u> OR CALL (951) 656-7000 FOR MORE INFORMATION. THANK YOU.

Page 2 of 2 in Comment Letter I-165

Response to Comment Letter I-165

Jerry Shearer Jr. July 22, 2024

- **I-165.1** This comment discusses personal experience with daytime flights that are not related to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- Inis comment raises general concerns regarding the level of control March JPA has over noise from cargo flights associated with warehouses. MIPAA does not have authority over flight paths or aircraft types. The Joint Use Agreement includes limitations on both the hours of operations (as a result of March ARB air control tower hours) and the total number of civilian flight operations. MIPAA implements the Joint Use Agreement, including the foregoing limitations, through conditions of approval and operating agreements. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-165.3 This comment requests March JPA to cancel the Proposed Project and instead analyze non-industrial alternatives for the site. The Quit Claim deed for the D-1 Property (Appendix J-2) requires the project site to be used for public airport purposes. In developing the alternatives to be addressed in Chapter 5, Alternatives, of the EIR, consideration was given to the ability to meet the basic objectives of the Proposed Project and eliminate or substantially reduce the identified significant environmental impacts. Chapter 5 includes the analysis of Alternative 1: No Project Alternative, Alternative 2: Nighttime Flight Noise Reduction Alternative, and Alternative 3: Reduced Flight Operations Alternative. Here, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. Please refer to Chapter III, Errata, of this Final EIR for details.
- I-165.4 This comment requests that a previous email sent on July 1, 2024, from this commenter be included as a public comment to the EIR. A response to the July 1, 2024, comment is provided in Response I-165.6, below.
- I-165.5 This comment notes that March JPA has the commenter's permission to send the comment letter to March ARB/Inland Port Airport and/or the FAA regarding flights not associated with the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-165.6 This comment shares a personal experience of a flight not associated with the Proposed Project deviating from the standard flight path over the Orangecrest neighborhood, as well as general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Comment Letter I-166

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

•	How will the project impact the local wildlife and ecosystems?	T I-166.2
•	Are there any endangered species in the project area that could be affected?	† I-166.3
•	What measures are in place to protect water quality in the surrounding areas?	1-166.4
•	Has the potential impact on groundwater been thoroughly assessed?	1-166.5
•	Are there any plans to mitigate the project's impact on air quality?	T _{I-166.6}
•	How will the project affect the overall noise levels in the area?	T I-166.7
•	What steps will be taken to minimize light pollution from the project?	1-166.8
•	Has the project considered the long-term effects on climate change?	Ĭ I-166.9
•	Are there any plans for sustainable energy use in the project?	I -166.10
•	How will the project impact local traffic patterns and congestion?	I -166.11
•	What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I I-166.12
•	Has the project considered the potential increase in accidents due to increased traffic?	I -166.13
•	Are there any plans to improve public transportation access to the project site?	I -166.14
•	How will the project impact the quality of life for nearby residents?	∏ -166.15
•	What measures are in place to address potential health risks associated with the project?	I -166.16
•	Has the project considered the cumulative impact of other nearby developments?	I -166.17

1-166.1

1

•	Are there any plans to address potential environmental justice concerns in the project area?	T I-166.18
•	How will the project affect the visual aesthetics of the surrounding area?	T I-166.19
•	Are there any plans to preserve or enhance the natural beauty of the project site?	T I-166.20
•	Has the project considered the impact on property values in the surrounding area?	T I-166.21
•	What measures are in place to address potential soil contamination from the project?	T I-166.22
•	How will the project impact the local economy and job market?	T I-166.23
•	Are there any plans to mitigate the project's impact on local businesses?	T I-166.24
•	Has the project considered the potential displacement of residents or businesses?	I -166.25
•	What measures are in place to address potential cultural heritage sites in the project area?	I -166.26
•	How will the project impact the overall community cohesion and social dynamics?	I I-166.27
•	Are there any plans to address potential gentrification issues in the project area?	I I-166.28
	Has the project considered the potential increase in demand for public services?	∐ -166.29
•	What measures are in place to address potential strain on local infrastructure?	I ∣-166.30
•	How will the project impact the availability of affordable housing in the area?	I ∣-166.31
	Are there any plans to address potential noise pollution from increased aviation activities?	I ∣-166.32
•	How will the project impact the local schools and educational facilities?	I ∣-166.33
•	Has the project considered the potential impact on healthcare services in the area?	I ∣-166.34
•	What measures are in place to address potential emergency response challenges?	1-166.35
•	Are there any plans to mitigate the project's impact on nearby recreational areas?	1-166.36
•	How will the project impact the overall sense of community in the area?	1-166.37
•	Has the project considered the potential increase in light pollution from the airport operations?	1-166.38
•	What measures are in place to address potential safety hazards from increased air traffic?	1-166.39
•	How will the project impact the local flora and fauna in the area?	1-166.40
•	Are there any plans to mitigate the project's impact on migratory bird populations?	1-166.41
•	Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I-166.42
•	What measures are in place to address potential water pollution from airport operations?	1-166.43
•	How will the project impact the overall biodiversity of the area?	T I-166.44
	Are there any plans to preserve or enhance natural habitats in the project area?	I I-166.45
•	Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I-166.46
	What measures are in place to promote sustainable aviation practices?	1-166.47
	How will the project impact the overall carbon footprint of the region?	1-166.48
•	Are there any plans to offset the project's carbon emissions through environmental initiatives?	1-166.49
•	Has the project considered the potential impact on local weather patterns from increased aviation activities?	1-166.50
	What measures are in place to address potential climate change effects from airport operations?	1-166.51
•		1-166.51
•	How will the project impact the overall air quality in the region?	-
•	Are there any plans to monitor and report on air quality data in real-time?	1-166.53
•	Has the project considered the potential health risks associated with poor air quality?	-166.54 -166.55
•	What measures are in place to address potential respiratory issues from increased air pollution?	+
•	How will the project impact the overall noise levels in the region?	I-166.56 I-166.57
•	Are there any plans to implement noise mitigation strategies for affected communities?	T 1-100.57

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pollution?	+
What measures are in place to address potential sleep disturbances from airport.	perations? I-166.59
 How will the project impact the overall light pollution in the region? 	I-166.60
 Are there any plans to implement dark sky initiatives to reduce light pollution? 	1-166.61
 Has the project considered the potential impact on nocturnal animals from increalighting? 	+
What measures are in place to address potential light trespass issues for nearby relationships.	sidents? 1-166.63
 How will the project impact the overall water quality in the region? 	† _{I-166.64}
 Are there any plans to prevent water contamination from airport operations? 	1-166.65
Has the project considered the potential runoff and drainage issues from the proj	
What measures are in place to address potential water scarcity concerns in the ar	
 How will the project impact the overall soil quality in the region? 	1-166.68
 Are there any plans to prevent soil erosion and degradation from construction act 	vities? 1-166.69
Has the project considered the potential contamination of soil from hazardous management.	+
What measures are in place to address potential soil remediation needs in the are	
How will the project impact the overall traffic congestion in the region?	1-166.72
Are there any plans to improve transportation infrastructure to alleviate traffic iss	ues? 1-166.73
Has the project considered the potential increase in accidents from congested roa	
 What measures are in place to address potential traffic management challenges? 	I I-166.75
How will the project impact the overall public transportation system in the region	J-166.76
• Are there any plans to enhance public transit options to reduce reliance on cars?	I-166.77
• Has the project considered the potential strain on public transportation services?	I-166.78
What measures are in place to address potential accessibility issues for public training.	sit users? I-166.79
How will the project impact the overall community health and safety in the region	T 1 400 00
 Are there any plans to promote healthy living initiatives for residents in the area? 	I -166.81
Has the project considered the potential health risks associated with increased potential.	llution? I I-166.82
What measures are in place to address potential emergency response needs for t	1 100 00
How will the project impact the overall community resilience to environmental has	
Are there any plans to implement disaster preparedness programs for the commu-	
Has the project considered the community's potential vulnerability to climate cha	
What measures are in place to address potential public health crises in the region	
How will the project comply with local, state, and federal environmental regulation	
Are there any plans to ensure regulatory compliance throughout the project lifecy	1 : =00:00
Has the project obtained all necessary permits and approvals for construction and	1 1-100.03
What measures are in place to address potential regulatory violations during the	
How will the project ensure long-term sustainability and environmental stewards!	1 . 200.02
 Are there any plans to monitor and evaluate the project's environmental perform time? 	1
Has the project considered the potential need for adaptive management strategies.	s?
 What measures are in place to promote environmental education and awareness community? 	

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	How will the project engage with stakeholders and the public to address environmental	T _{I-166.96}
	concerns?	1 1200.50
•	Are there any plans to establish a community advisory board for ongoing environmental oversight?	I-166.97
•	Has the project considered the potential need for independent environmental audits and reviews?	1-166.98
•	What measures are in place to ensure transparency and accountability in environmental reporting?	I-166.99
	How will the project address any unforeseen environmental challenges or emergencies?	I I-166.100
•	Are there any plans to establish a contingency fund for environmental mitigation efforts?	1-166.101
	How will the proposed project impact local wildlife habitats and biodiversity?	1-166.102
•	Has the report thoroughly assessed the potential noise pollution from the project on nearby residential areas?	I-166.103
•	What measures are in place to mitigate the impact of increased traffic congestion in the surrounding area?	I-166.104
•	Are there any plans to address the potential increase in air pollution resulting from the project?	1-166.105
•	How will the project affect the quality of water sources in the vicinity?	1-166.106
•	Has the report considered the long-term effects of the project on the local climate and microclimate?	I-166.107
•	What steps will be taken to minimize light pollution from the project's operations?	I I-166.108
•	How will the project impact the visual aesthetics of the surrounding area?	1-166.109
•	Are there any plans to address the potential disruption of local ecosystems caused by the project?	I-166.110
•	Has the report thoroughly assessed the risk of soil contamination from construction activities?	I -166.111
•	What measures are in place to prevent soil erosion during and after construction?	1-166.112
•	How will the project impact the availability of green spaces and recreational areas in the community?	I-166.113
•	Are there any plans to mitigate the potential loss of agricultural land due to the project?	I -166.114
•	Has the report considered the impact of the project on groundwater resources in the area?	1-166.115
•	What measures are in place to ensure the safety of nearby residents in case of emergencies related to the project?	I-166.116
•	How will the project affect the overall air quality in the region?	I-166.117
•	Are there any plans to address the potential increase in greenhouse gas emissions resulting from the project?	I-166.118
•	Has the report thoroughly assessed the risk of wildfires in the area due to the project?	I I-166.119
•	What measures are in place to protect local water bodies from pollution during and after construction?	I-166.120
•	How will the project impact the local flora and fauna species, especially those that are endangered or protected?	I-166.121
•	Are there any plans to address the potential displacement of wildlife habitats caused by the project?	I-166.122
•	Has the report considered the impact of the project on nearby wetlands and waterways?	1-166.123

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•	What measures are in place to ensure the safe disposal of hazardous materials used during	T I-166.124
•	construction and operation? How will the project impact the overall health and well-being of the local community?	1-166.125
•	Are there any plans to address the potential increase in waste generation resulting from the project?	1-166.126
•	Has the report thoroughly assessed the risk of landslides in the area due to the project?	† I-166.127
•	What measures are in place to protect the local population from exposure to harmful chemicals or pollutants?	I-166.128
•	How will the project impact the availability of affordable housing in the region?	I I-166.129
•	Are there any plans to address the potential gentrification of the area due to the project?	I I-166.130
•	Has the report considered the impact of the project on the cultural heritage and historical sites in the vicinity?	I-166.131
•	What measures are in place to ensure the project complies with all relevant environmental regulations and standards?	I-166.132
•	How will the project impact the local economy, including job creation and income generation?	1-166.133
•	Are there any plans to address the potential increase in light and noise pollution from the project's operations?	-166.134
•	Has the report thoroughly assessed the risk of flooding in the area due to the project?	I I-166.135
•	What measures are in place to protect the local population from the spread of diseases or health hazards associated with the project?	I-166.136
•	How will the project impact the availability of public transportation and infrastructure in the region?	I-166.137
•	Are there any plans to address the potential strain on public services and utilities caused by the project?	I-166.138
•	Has the report considered the impact of the project on property values and real estate in the surrounding area?	I-166.139
•	What measures are in place to ensure the project's long-term sustainability and environmental stewardship?	I-166.140
•	How will the project impact the overall livability and quality of life for residents in the community?	I-166.141
•	Are there any plans to address the potential social inequalities or disparities that may arise from the project?	I-166.142
٠	Has the report thoroughly assessed the risk of soil contamination from hazardous waste disposal related to the project?	I-166.143
٠	What measures are in place to protect vulnerable populations, such as children and the elderly, from the project's negative impacts?	1-166.144
•	How will the project impact the local infrastructure, including roads, bridges, and utilities?	I I-166.145
•	Are there any plans to address the potential increase in traffic accidents and road safety issues resulting from the project?	I-166.146
•	Has the report considered the impact of the project on nearby schools, hospitals, and other essential services?	I-166.1 4 7
•	What measures are in place to ensure the project's compliance with all relevant zoning and land use regulations?	I-166.148

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	How will the project impact the overall social cohesion and community well-being in the area?	I -166.149
•	Are there any plans to address the potential loss of community cohesion and sense of belonging due to the project?	I-166.150
•	Has the report thoroughly assessed the risk of air and water pollution from the project's operations?	-166.151
•	What measures are in place to protect the local population from exposure to harmful chemicals or pollutants released by the project?	1-166.152
•	How will the project impact the availability of affordable housing and rental properties in the region?	-166.153
٠	Are there any plans to address the potential displacement of low-income residents and vulnerable communities caused by the project?	-166.154
•	Has the report considered the impact of the project on local cultural heritage sites and historical landmarks?	I-166.155
•	What measures are in place to ensure the project's alignment with sustainable development goals and environmental best practices?	-166.156
•	How will the project impact the local job market and employment opportunities for residents?	I-166.157
•	Are there any plans to address the potential increase in noise pollution and disturbances from the project's activities?	I-166.158
٠	Has the report thoroughly assessed the risk of contamination of local water sources and aquifers due to the project?	I-166.159
•	What measures are in place to protect the local flora and fauna species, especially those that are rare or endangered?	-166.160
•	How will the project impact the overall landscape and visual aesthetics of the surrounding area?	I-166.161
•	Are there any plans to address the potential loss of green spaces and recreational areas caused by the project?	I-166.162
•	Has the report considered the impact of the project on local traffic patterns and congestion in the area?	I-166.163
•	What measures are in place to mitigate the potential increase in air and noise pollution from the project's operations?	I-166.164
•	How will the project impact the availability of public parks and open spaces for the community?	-166.165
٠	Are there any plans to address the potential disruption of local ecosystems and natural habitats due to the project?	I-166.166
•	Has the report thoroughly assessed the risk of soil erosion and sedimentation from construction activities related to the project?	I-166.167
•	What measures are in place to prevent the release of hazardous materials and chemicals into the environment during and after construction?	I-166.168
•	How will the project impact the overall health and well-being of residents living in the vicinity?	1-166.169
•	Are there any plans to address the potential increase in waste generation and landfill usage resulting from the project?	I-166.170
•	Has the report considered the impact of the project on nearby water bodies and aquatic ecosystems?	-166.171
•	What measures are in place to ensure the safe disposal of construction debris and waste materials?	1-166.172

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	How will the project impact the local air quality and emission levels in the region?	T I-166.173
•	Are there any plans to address the potential increase in greenhouse gas emissions and carbon footprint from the project?	I-166.174
•	Has the report thoroughly assessed the risk of contamination of local soil and groundwater from construction activities?	-166.175
•	What measures are in place to protect the local population from exposure to harmful pollutants and toxins?	-166.176
•	How will the project impact the availability of affordable housing and rental properties for residents?	I-166.177
٠	Are there any plans to address the potential displacement of low-income families and vulnerable populations due to the project?	I-166.178
•	Has the report considered the impact of the project on local cultural heritage sites and historical landmarks?	I-166.179
•	What measures are in place to ensure the project's compliance with all relevant environmental regulations and guidelines?	I-166.180
•	How will the project impact the local economy, including job creation and economic growth?	I -166.181
•	Are there any plans to address the potential increase in light pollution and disruption of natural night skies?	I-166.182
•	Has the report thoroughly assessed the risk of soil contamination and leaching of chemicals from the project site?	1-166.183
•	What measures are in place to prevent the spread of invasive species and pests due to the project?	-166.184
•	How will the project impact the overall biodiversity and ecological balance of the area?	-166.185
•	Are there any plans to address the potential loss of native plant and animal species habitats?	1-166.186
•	Has the report considered the impact of the project on local water quality and aquatic ecosystems?	I-166.187
•	What measures are in place to protect the local watershed and prevent water pollution from the project?	I-166.188
•	How will the project impact the availability of clean drinking water for residents in the region?	I-166.189
•	Are there any plans to address the potential disruption of natural drainage patterns and flood risks due to the project?	I-166.190
•	Has the report thoroughly assessed the risk of soil compaction and loss of soil fertility from construction activities?	I-166.191
•	What measures are in place to promote sustainable land use practices and soil conservation?	I -166.192
•	How will the project impact the overall landscape aesthetics and scenic beauty of the area?	↓ 1-166.193
•	Are there any plans to address the potential loss of scenic views and natural landscapes caused by the project?	I-166.194
•	Has the report considered the impact of the project on local recreational areas and outdoor recreational opportunities?	-166.195
•	What measures are in place to ensure the preservation of cultural heritage sites and historical landmarks in the vicinity?	-166.196
•	How will the project impact the availability of green spaces and public parks for community use?	I I-166.197

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•	Are there any plans to address the potential disruption of local ecosystems and wildlife habitats due to the project?	I-166.198
•	Has the report thoroughly assessed the risk of soil erosion and sediment runoff from the project site?	I-166.199
٠	What measures are in place to prevent the release of pollutants and contaminants into the air and water during construction?	-166.200
٠	How will the project impact the overall environmental sustainability and long-term ecological health of the region?	I-166.201
٠	What specific hazardous materials were historically used, stored, or disposed of at the former March AFB that could impact the project site?	I-166.202
•	Are there any ongoing monitoring programs in place to track the levels of hazardous materials in the soil, soil gas, and groundwater at the project site?	I-166.203
•	How will the project address the contamination of chlorinated VOCs, particularly trichloroethylene (TCE), in the soil, soil gas, and groundwater?	I-166.204
•	What are the potential health risks associated with exposure to PFOS and PFOA in the soil and groundwater at the project site?	I-166.205
•	How will the project ensure the safety of workers and future occupants in light of the documented soil, soil gas, and groundwater contamination at Site 7?	I-166.206
•	Are there any plans in place to mitigate the risks associated with PFAS contamination in the soil and groundwater?	I-166.207
•	What measures will be taken to prevent the spread of contaminated groundwater during construction activities?	I-166.208
•	How will the project ensure compliance with federal, state, and local regulations regarding the handling, transport, and disposal of hazardous materials?	I-166.209
•	What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential hazards?	I-166.210
•	Are there any contingency plans in case of accidental release of hazardous materials during construction?	I-166.211
•	How will the project address the potential safety hazards posed by the expansion and modification of the existing southern access roadway?	-166.212
•	What measures are in place to prevent the exposure of people or structures to significant risks of loss, injury, or death involving wildland fires?	I-166.213
•	How will the project ensure that hazardous materials are stored, used, and transported in compliance with relevant regulations?	I-166.214
•	Are there any plans for the safe removal and disposal of hazardous wastes during construction?	-166.215
•	What role will the California Office of Emergency Services play in overseeing the handling and release of hazardous materials during the project?	I-166.216
٠	How will the project comply with the hazardous substances regulations enforced by the California Occupational Safety and Health Administration?	I-166.217
•	Are there any specific guidelines in place for the handling of asbestos during construction activities?	I-166.218
•	What measures will be taken to ensure the safety of workers exposed to hazardous substances during construction?	-166.219

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		42 46 44
•	How will the project address the potential risks associated with construction activities near contaminated groundwater wells?	I-166.220
•	Are there any plans to monitor and manage contaminated groundwater encountered during excavation activities?	I-166.221
	What procedures will be followed in case of groundwater contamination during construction?	† 1-166.222
•	How will the project ensure that contaminated groundwater is properly managed and treated if encountered during construction?	-166.223
•	What measures are in place to prevent the disturbance of existing treatment systems (e.g., soil vapor extraction systems) during construction?	l-166.224
٠	How will the project address potential impacts on wildlife, particularly birds, attracted to the project site?	I-166.225
•	Are there any specific measures in place to protect wildlife and prevent potential safety risks to aircraft in flight?	I-166.226
•	What steps will be taken to incorporate recommendations from the Wildlife Hazard Review into the project design?	I-166.227
•	How will the project ensure that noise levels are within acceptable limits for nearby land uses?	↓ 1-166.228
•	Are there any plans to mitigate noise impacts on nearby residential areas during construction and operation?	I-166.229
•	What measures will be taken to reduce noise intrusions upon indoor activities within the project site?	I-166.230
٠	How will the project comply with the California Building Code requirements for interior environmental comfort regarding noise levels?	I-166.231
•	Are there any provisions for providing hearing protection to workers exposed to excessive noise during construction?	1-166.232
•	What measures are in place to prevent potential safety hazards that could interfere with aircraft operations?	I-166.233
•	How will the project address potential safety risks associated with drainage features and vegetation attracting animals near the active runway?	I-166.234
•	Are there any specific guidelines for the construction of drainage features and vegetation to minimize safety risks to aircraft?	l-166.235
•	What steps will be taken to ensure that the project does not exacerbate existing conditions of hazardous materials on the site?	I-166.236
•	How will the project ensure that impacts associated with hazardous materials are controlled and do not have cumulative effects?	I-166.237
•	Are there any plans to monitor and address any cumulative impacts of handling, transporting, and disposing of hazardous materials from nearby projects?	I-166.238
•	What measures will be taken to ensure that the project does not contribute to cumulative hazards in the area?	1-166.239
•	How will the project address any potential long-term sustainability issues related to hazardous materials and waste management?	1-166.240
•	Are there any plans for ongoing monitoring and maintenance of hazardous materials after the completion of the project?	l-166.241

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•	What measures will be taken to ensure the long-term safety and health of workers and	T I-166.242
	occupants in relation to hazardous materials? How will the project ensure compliance with all relevant environmental regulations throughout	+
	the project's lifespan?	I-166.243
•	Are there any provisions for public access to information regarding hazardous materials used, stored, or disposed of at the project site?	1-166.244
•	What steps will be taken to address any unforeseen hazards or risks that may arise during the project's construction and operation?	I-166.245
•	How will the project address any potential environmental justice concerns related to hazardous materials and waste management?	I-166.246
•	Are there any plans in place to involve the local community in decision-making processes regarding hazardous materials and waste management?	1-166.247
•	What measures will be taken to ensure transparency and accountability in the handling of hazardous materials throughout the project?	I-166.248
•	How will the project address any potential conflicts with existing environmental regulations and guidelines?	I-166.249
•	Are there any provisions for regular audits and inspections to ensure compliance with hazardous materials management requirements?	I-166.250
•	What steps will be taken to address any gaps or deficiencies in the current hazardous materials management plan?	I-166.251
•	How will the project ensure that all workers and contractors involved in hazardous materials management are properly trained and equipped?	I-166.252
•	Are there any provisions for emergency response and contingency planning in case of hazardous materials incidents?	I-166.253
•	What measures will be taken to prevent the unauthorized release or disposal of hazardous materials during the project?	I-166.254
•	How will the project ensure that hazardous materials are properly labeled and stored to prevent accidents and spills?	l-166.255
•	Are there any plans for public education and awareness campaigns regarding hazardous materials and waste management?	I-166.256
•	What steps will be taken to minimize the environmental impact of hazardous materials on surrounding ecosystems and wildlife?	I-166.257
•	How will the project address any potential risks to groundwater quality and availability posed by hazardous materials?	I-166.258
•	Are there any provisions for ongoing monitoring and reporting of hazardous materials impacts on the environment?	I-166.259
•	What measures will be taken to ensure the safe and responsible disposal of hazardous wastes generated during the project?	I-166.260
•	How will the project address any potential risks of contamination to nearby water sources from hazardous materials?	I-166.261
•	Are there any plans for remediation and cleanup of contaminated areas after the project is completed?	1-166.262

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•	What steps will be taken to ensure the long-term sustainability of hazardous materials management practices at the project site?	I-166.263
•	How will the project address any potential conflicts with neighboring land uses and communities regarding hazardous materials?	I-166.264
•	Are there any provisions for stakeholder engagement and consultation regarding hazardous materials management practices?	I-166.265
•	Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	-166.266

Sincerely,

Lewis J. Allen

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Tenf Hel

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Response to Comment Letter I-166

Lewis Allen July 22, 2024

I-166.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-166.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-166.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-166.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-166.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-166.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-166.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-166.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-166.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-166.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-166.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-166.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-166.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-166.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-166.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-166.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-166.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-166.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-166.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-166.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-166.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-166.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-166.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-166.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-166.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-166.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-166.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-166.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-166.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-166.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-166.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-166.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-166.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-166.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-166.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-166.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-166.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-166.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-166.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-166.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-166.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-166.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-166.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-166.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-166.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-166.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-166.47 This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10. I-166.48 This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12. I-166.49 This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3. I-166.50 This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4. I-166.51 This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13. I-166.52 This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11. I-166.53 This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3. I-166.54 This comment is FAO-AO-5. Please see the response to FAO-AO-5. I-166.55 This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14. I-166.56 This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10. I-166.57 This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3. I-166.58 This comment is FAO-BIO-10. Please see the response to FAO-BIO-10. I-166.59 This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11. This comment is FAQ-AES-9. Please see the response to FAQ-AES-9. I-166.60 I-166.61 This comment is FAO-AES-3. Please see the response to FAO-AES-3. I-166.62 This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11. I-166.63 This comment is FAQ-AES-11. Please see the response to FAQ-AES-11. I-166.64 This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16. I-166.65 This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3. I-166.66 This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5. This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5. I-166.67 I-166.68 This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7. I-166.69 This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1. I-166.70 This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.

I-166.71 This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38. I-166.72 This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13. I-166.73 This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4. I-166.74 This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6. I-166.75 This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15. I-166.76 This comment is FAO-TRA-12. Please see the response to FAO-TRA-12. This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2. I-166.77 I-166.78 This comment is FAQ-TRA-7. Please see the response to FAQ-TRA-7. I-166.79 This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14. I-166.80 This comment is FAO-PUB-9. Please see the response to FAO-PUB-9. I-166.81 This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3. I-166.82 This comment is recorded as FAQ-AQ-4 and FAQ-HAZ-73. Please see the responses to FAQ-AQ-4 and FAO-HAZ-73. I-166.83 This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4. This comment is FAQ-HAZ-35. Please see the response to FAQ-HAZ-35. I-166.84 I-166.85 This comment is FAO-HAZ-10. Please see the response to FAO-HAZ-10. I-166.86 This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6. I-166.87 This comment is FAQ-MISC-10. Please see the response to FAQ-MISC-10. I-166.88 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7. I-166.89 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1. I-166.90 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4. I-166.91 This comment is FAO-PROCESS-9. Please see the response to FAO-PROCESS-9. I-166.92 This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11. I-166.93 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3.

- **I-166.94** This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5.
- I-166.95 This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.
- I-166.96 This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8.
- I-166.97 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2.
- I-166.98 This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6.
- **I-166.99** This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12.
- **I-166.100** This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5.
- I-166.101 This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2.
- **I-166.102** This comment is FAQ-BIO-19. Please see the response to FAQ-BIO-19.
- **I-166.103** This comment is FAQ-NOI-6. Please see the response to FAQ-NOI-6.
- I-166.104 This comment is FAQ-TRA-17. Please see the response to FAQ-TRA-17.
- I-166.105 This comment is FAQ-AQ-1. Please see the response to FAQ-AQ-1.
- **I-166.106** This comment is FAQ-HYD-13. Please see the response to FAQ-HYD-13.
- I-166.107 This comment questions impacts to local climate and microclimate. Please see the responses to FAQ-AQ-6 and FAQ-GHG-9.
- I-166.108 This comment is FAQ-AES-13. Please see the response to FAQ-AES-13.
- I-166.109 This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
- **I-166.110** This comment is FAQ-BIO-4. Please see the response to FAQ-BIO-4.
- **I-166.111** This comment questions risk of soil contamination. Please see the responses to FAQ-GEO-4 and FAQ-HAZ-20.
- I-166.112 This comment is FAQ-GEO-8. Please see the response to FAQ-GEO-8.
- I-166.113 This comment is FAQ-REC-4. Please see the response to FAQ-REC-4.
- I-166.114 This comment is FAO-AG-1. Please see the response to FAO-AG-1.
- I-166.115 This comment is FAQ-HYD-6. Please see the response to FAQ-HYD-6.
- I-166.116 This comment is FAQ-HAZ-41. Please see the response to FAQ-HAZ-41.

- **I-166.117** This comment is FAQ-AQ-9. Please see the response to FAQ-AQ-9.
- **I-166.118** This comment is FAQ-GHG-2. Please see the response to FAQ-GHG-2.
- I-166.119 This comment is FAQ-FIRE-1. Please see the response to FAQ-FIRE-1.
- I-166.120 This comment is FAQ-HYD-19. Please see the response to FAQ-HYD-19.
- I-166.121 This comment is FAQ-BIO-16. Please see the response to FAQ-BIO-16.
- **I-166.122** This comment is FAQ-BIO-2. Please see the response to FAQ-BIO-2.
- I-166.123 This comment questions impacts to nearby wetlands and waterways. Please see the responses to FAO-BIO-12 and FAO-HYD-9.
- I-166.124 This comment is FAQ-HAZ-40. Please see the response to FAQ-HAZ-40.
- **I-166.125** This comment is FAQ-EJ-5. Please see the response to FAQ-EJ-5.
- **I-166.126** This comment is FAQ-UTL-2. Please see the response to FAQ-UTL-2.
- **I-166.127** This comment is FAQ-GEO-2. Please see the response to FAQ-GEO-2.
- I-166.128 This comment is FAO-HAZ-47. Please see the response to FAO-HAZ-47.
- I-166.129 This comment is FAQ-POP-8. Please see the response to FAQ-POP-8.
- **I-166.130** This comment is FAQ-EJ-8. Please see the response to FAQ-EJ-8.
- I-166.131 This comment is FAO-CUL-2. Please see the response to FAO-CUL-2.
- I-166.132 This comment is FAQ-PROCESS-10. Please see the response to FAQ-PROCESS-10.
- I-166.133 This comment is FAQ-POP-11. Please see the response to FAQ-POP-11.
- I-166.134 This comment questions light and noise pollution. Please see the responses to FAQ-AES-14 and FAQ-NOI-15.
- I-166.135 This comment is FAQ-HYD-11. Please see the response to FAQ-HYD-11.
- I-166.136 This comment is FAQ-MISC-12. Please see the response to FAQ-MISC-12.
- I-166.137 This comment is FAQ-TRA-11. Please see the response to FAQ-TRA-11.
- I-166.138 This comment questions impacts to public services and utilities. Please see the responses to FAQ-PUB-6 and FAQ-UTL-8.
- I-166.139 This comment is FAQ-MISC-7. Please see the response to FAQ-MISC-7.

- **I-166.140** This comment questions long-term sustainability and environmental stewardship. Please see the responses to FAQ-ENG-9 and FAQ-MISC-11.
- **I-166.141** This comment is FAQ-EJ-6. Please see the response to FAQ-EJ-6.
- **I-166.142** This comment is FAQ-EJ-2. Please see the response to FAQ-EJ-2.
- I-166.143 This comment is FAQ-HAZ-21. Please see the response to FAQ-HAZ-21.
- I-166.144 This comment questions air and noise pollution. Please see the responses to FAQ-AQ-21 and FAQ-NOI-17.
- **I-166.145** This comment questions impacts to local infrastructure. Please see the responses to FAQ-TRA-18 and FAQ-UTL-7.
- **I-166.146** This comment is FAQ-TRA-1. Please see the response to FAQ-TRA-1.
- **I-166.147** This comment is FAQ-PUB-7. Please see the response to FAQ-PUB-7.
- **I-166.148** This comment is FAQ-LU-5. Please see the response to FAQ-LU-5.
- I-166.149 This comment is FAQ-EJ-9. Please see the response to FAQ-EJ-9.
- I-166.150 This comment is FAQ-MISC-1. Please see the response to FAQ-MISC-1.
- **I-166.151** This comment questions air and water pollution. Please see the responses to FAQ-AQ-18 and FAQ-HYD-26.
- I-166.152 This comment is FAQ-HAZ-46. Please see the response to FAQ-HAZ-46.
- I-166.153 This comment is FAO-POP-6. Please see the response to FAO-POP-6.
- **I-166.154** This comment is FAQ-POP-2. Please see the response to FAQ-POP-2.
- I-166.155 This comment is FAQ-CUL-1. Please see the response to FAQ-CUL-1.
- **I-166.156** This comment is FAQ-ENG-8. Please see the response to FAQ-ENG-8.
- I-166.157 This comment is FAQ-POP-12. Please see the response to FAQ-POP-12.
- I-166.158 This comment is FAQ-NOI-2. Please see the response to FAQ-NOI-2.
- I-166.159 This comment is FAQ-HYD-10. Please see the response to FAQ-HYD-10.
- I-166.160 This comment is FAQ-BIO-21. Please see the response to FAQ-BIO-21.
- **I-166.161** This comment is FAQ-AES-8. Please see the response to FAQ-AES-8.
- **I-166.162** This comment is FAQ-REC-1. Please see the response to FAQ-REC-1.

- **I-166.163** This comment is FAQ-TRA-8. Please see the response to FAQ-TRA-8.
- **I-166.164** This comment questions impacts to vulnerable populations. Please see the responses to FAQ-AQ-19 and FAQ-NOI-16.
- I-166.165 This comment is FAQ-REC-6. Please see the response to FAQ-REC-6.
- I-166.166 This comment is FAQ-BIO-3. Please see the response to FAQ-BIO-3.
- **I-166.167** This comment is FAQ-GEO-6. Please see the response to FAQ-GEO-6.
- **I-166.168** This comment is FAQ-HAZ-45. Please see the response to FAQ-HAZ-45.
- I-166.169 This comment is FAQ-EJ-4. Please see the response to FAQ-EJ-4.
- I-166.170 This comment is FAQ-UTL-1. Please see the response to FAQ-UTL-1.
- **I-166.171** This comment questions impacts to nearby waterbodies and aquatic ecosystems. Please see the responses to FAQ-BIO-25 and FAQ-HYD-8.
- I-166.172 This comment is FAQ-HAZ-39. Please see the response to FAQ-HAZ-39.
- I-166.173 This comment is FAQ-AQ-10. Please see the response to FAQ-AQ-10.
- I-166.174 This comment is FAQ-GHG-1. Please see the response to FAQ-GHG-1.
- **I-166.175** This comment is FAQ-HAZ-75. Please see the response to FAQ-HAZ-75.
- I-166.176 This comment questions exposure to harmful pollutants and toxins. Please see the responses to FAQ-AQ-20 and FAQ-HAZ-48.
- I-166.177 This comment is FAQ-POP-5. Please see the response to FAQ-POP-5.
- I-166.178 This comment is FAO-POP-1. Please see the response to FAO-POP-1.
- **I-166.179** This comment is FAQ-CUL-1. Please see the response to FAQ-CUL-1.
- I-166.180 This comment is FAQ-PROCESS-11. Please see the response to FAQ-PROCESS-11.
- I-166.181 This comment is FAQ-POP-10. Please see the response to FAQ-POP-10.
- **I-166.182** This comment is FAQ-AES-1. Please see the response to FAQ-AES-1.
- **I-166.183** This comment is FAQ-HAZ-19. Please see the response to FAQ-HAZ-19.
- I-166.184 This comment is FAQ-BIO-20. Please see the response to FAQ-BIO-20.
- I-166.185 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.

- **I-166.186** This comment is FAQ-BIO-5. Please see the response to FAQ-BIO-5.
- **I-166.187** This comment questions impacts to local water quality and aquatic ecosystems. Please see the responses to FAQ-BIO-24 and FAQ-HYD-7.
- I-166.188 This comment is FAQ-HYD-20. Please see the response to FAQ-HYD-20.
- I-166.189 This comment is FAQ-HYD-15. Please see the response to FAQ-HYD-15.
- I-166.190 This comment is FAQ-HYD-1. Please see the response to FAQ-HYD-1.
- **I-166.191** This comment is FAQ-GEO-3. Please see the response to FAQ-GEO-3.
- I-166.192 This comment is FAQ-ENG-11. Please see the response to FAQ-ENG-11.
- **I-166.193** This comment is FAQ-AES-7. Please see the response to FAQ-AES-7.
- **I-166.194** This comment is FAQ-AES-2. Please see the response to FAQ-AES-2.
- **I-166.195** This comment is FAQ-REC-3. Please see the response to FAQ-REC-3.
- **I-166.196** This comment is FAQ-CUL-4. Please see the response to FAQ-CUL-4.
- I-166.197 This comment is similar to FAO-REC-4. Please see the response to FAO-REC-4.
- I-166.198 This comment is FAQ-BIO-3. Please see the response to FAQ-BIO-3.
- **I-166.199** This comment is FAQ-GEO-5. Please see the response to FAQ-GEO-5.
- I-166.200 This comment is FAO-HYD-18. Please see the response to FAO-HYD-18.
- **I-166.201** This comment questions overall environmental sustainability and long-term ecological health. Please see the responses to FAQ-BIO-26 and FAQ-ENG-12.
- **I-166.202** This comment is FAQ-HAZ-58. Please see the response to FAQ-HAZ-58.
- I-166.203 This comment is recorded as FAQ-HAZ-71 and FAQ-HYD-24. Please see the responses to FAQ-HAZ-71 and FAQ-HYD-24.
- **I-166.204** This comment is recorded as FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29. Please see the responses to FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29.
- I-166.205 This comment is FAQ-HAZ-78. Please see the response to FAQ-HAZ-78.
- I-166.206 This comment is FAO-HAZ-77. Please see the response to FAO-HAZ-77.
- **I-166.207** This comment is recorded as FAQ-HAZ-9 and FAQ-HYD-25. Please see the responses to FAQ-HAZ-9 and FAQ-HYD-25.

- I-166.208 This comment is FAQ-HYD-22. Please see the response to FAQ-HYD-22.
- I-166.209 This comment is FAQ-HAZ-31. Please see the response to FAQ-HAZ-31.
- I-166.210 This comment is a question regarding sensitive receptors. Please see the responses to FAQ-AQ-17, FAQ-HAZ-66, and FAQ-NOI-14.
- **I-166.211** This comment is FAQ-HAZ-1. Please see the response to FAQ-HAZ-1.
- **I-166.212** This comment questions safety hazards related to the expansion of the existing southern access roadway. Please see the responses to FAQ-HAZ-28 and FAQ-TRA-9.
- I-166.213 This comment is FAQ-HAZ-44. Please see the response to FAQ-HAZ-44.
- I-166.214 This comment is FAQ-HAZ-34. Please see the response to FAQ-HAZ-34.
- **I-166.215** This comment is FAQ-HAZ-7. Please see the response to FAQ-HAZ-7.
- I-166.216 This comment is FAQ-HAZ-57. Please see the response to FAQ-HAZ-57.
- I-166.217 This comment is FAQ-HAZ-29. Please see the response to FAQ-HAZ-29.
- I-166.218 This comment is FAQ-HAZ-17. Please see the response to FAQ-HAZ-17.
- **I-166.219** This comment is FAQ-HAZ-54. Please see the response to FAQ-HAZ-54.
- I-166.220 This comment is FAQ-HYD-12. Please see the response to FAQ-HYD-12.
- I-166.221 This comment is FAQ-HYD-2. Please see the response to FAQ-HYD-2.
- I-166.222 This comment is FAQ-HYD-23. Please see the response to FAQ-HYD-23.
- I-166.223 This comment is FAQ-HYD-14. Please see the response to FAQ-HYD-14.
- I-166.224 This comment is FAO-HAZ-43. Please see the response to FAO-HAZ-43.
- **I-166.225** This comment is FAQ-BIO-13. Please see the response to FAQ-BIO-13.
- I-166.226 This comment is FAQ-BIO-8. Please see the response to FAQ-BIO-8.
- **I-166.227** This comment is FAQ-BIO-22. Please see the response to FAQ-BIO-22.
- I-166.228 This comment is FAQ-NOI-9. Please see the response to FAQ-NOI-9.
- I-166.229 This comment is FAQ-NOI-4. Please see the response to FAQ-NOI-4.
- I-166.230 This comment is FAQ-NOI-12. Please see the response to FAQ-NOI-12.
- I-166.231 This comment is FAQ-NOI-8. Please see the response to FAQ-NOI-8.

I-166.232 This comment is FAQ-NOI-5. Please see the response to FAQ-NOI-5. I-166.233 This comment is FAQ-HAZ-42. Please see the response to FAQ-HAZ-42. I-166.234 This comment is FAQ-BIO-14. Please see the response to FAQ-BIO-14. **I-166.235** This comment is FAQ-HAZ-72. Please see the response to FAQ-HAZ-72. This comment is FAQ-HAZ-62. Please see the response to FAQ-HAZ-62. This comment is FAO-HAZ-68. Please see the response to FAO-HAZ-68. I-166.237 This comment is FAQ-HAZ-67. Please see the response to FAQ-HAZ-67. I-166.238 I-166.239 This comment is FAQ-HAZ-69. Please see the response to FAQ-HAZ-69. I-166.240 This comment is FAQ-HAZ-24. Please see the response to FAQ-HAZ-24. I-166.241 This comment is FAO-HAZ-3. Please see the response to FAO-HAZ-3. **I-166.242** This comment is FAQ-HAZ-63. Please see the response to FAQ-HAZ-63. I-166.243 This comment is FAQ-HAZ-30. Please see the response to FAQ-HAZ-30. I-166.244 This comment is FAO-HAZ-14. Please see the response to FAO-HAZ-14. This comment is FAQ-HAZ-61. Please see the response to FAQ-HAZ-61. I-166.245 I-166.246 This comment is FAQ-HAZ-23. Please see the response to FAQ-HAZ-23. I-166.247 This comment is FAQ-HAZ-8. Please see the response to FAQ-HAZ-8. I-166.248 This comment is FAQ-HAZ-55. Please see the response to FAQ-HAZ-55. This comment is FAQ-PROCESS-5. Please see the response to FAQ-PROCESS-5. I-166.250 This comment is FAQ-HAZ-70. Please see the response to FAQ-HAZ-70. I-166.251 This comment is FAQ-HAZ-59. Please see the response to FAQ-HAZ-59. I-166.252 This comment is FAQ-HAZ-32. Please see the response to FAQ-HAZ-32. This comment is FAQ-HAZ-12. Please see the response to FAQ-HAZ-12. I-166.253 I-166.254 This comment is FAQ-HAZ-56. Please see the response to FAQ-HAZ-56. This comment is FAQ-HAZ-33. Please see the response to FAQ-HAZ-33. I-166.255 I-166.256 This comment is FAQ-HAZ-4. Please see the response to FAQ-HAZ-4.

- **I-166.257** This comment questions hazardous materials impacts to surrounding ecosystems and wildlife. Please see the responses to FAQ-BIO-23 and FAQ-HAZ-65.
- **I-166.258** This comment questions hazardous materials impacts to groundwater quality. Please see the responses to FAQ-HAZ-27 and FAQ-HYD-28.
- I-166.259 This comment is FAQ-HAZ-13. Please see the response to FAQ-HAZ-13.
- **I-166.260** This comment is FAQ-HAZ-53. Please see the response to FAQ-HAZ-53.
- **I-166.261** This comment questions hazardous materials impacts to nearby water sources. Please see the responses to FAQ-HAZ-25 and FAQ-HYD-27.
- I-166.262 This comment is FAQ-HAZ-6. Please see the response to FAQ-HAZ-6.
- **I-166.263** This comment is FAQ-HAZ-63. Please see the response to FAQ-HAZ-63.
- **I-166.264** This comment is FAQ-LU-2. Please see the response to FAQ-LU-2.
- **I-166.265** This comment is FAQ-HAZ-16. Please see the response to FAQ-HAZ-16.
- **I-166.266** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-167

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Linda Baker < mamabaker 51@gmail.com>

Mon 7/22/2024 9:33 AM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-167.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	∐ 1-167.2
Are there any endangered species in the project area that could be affected?	I I-167.3
What measures are in place to protect water quality in the surrounding areas?	I I-167.4
Has the potential impact on groundwater been thoroughly assessed?	I I-167.5
Are there any plans to mitigate the project's impact on air quality?	I I-167.6
How will the project affect the overall noise levels in the area?	I I-167.7

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR

M/L-4-4	T
What steps will be taken to minimize light pollution from the project?	I I-167.8
Has the project considered the long-term effects on climate change?	I I-167.9
Are there any plans for sustainable energy use in the project?	I I-167.10
How will the project impact local traffic patterns and congestion?	I-167.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I I-167.12
Has the project considered the potential increase in accidents due to increased traffic?	I I-167.13
Are there any plans to improve public transportation access to the project site?	I I-167.14
How will the project impact the quality of life for nearby residents?	I I-167.15
What measures are in place to address potential health risks associated with the project?	I I-167.16
Has the project considered the cumulative impact of other nearby developments?	I I-167.17
Are there any plans to address potential environmental justice concerns in the project area?	I-167.18
How will the project affect the visual aesthetics of the surrounding area?	I I-167.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-167.20
Has the project considered the impact on property values in the surrounding area?	I I-167.21
What measures are in place to address potential soil contamination from the project?	I I-167.22
How will the project impact the local economy and job market?	I I-167.23
Are there any plans to mitigate the project's impact on local businesses?	I I-167.24
Has the project considered the potential displacement of residents or businesses?	I I-167.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-167.26
How will the project impact the overall community cohesion and social dynamics?	I I-167.27
Are there any plans to address potential gentrification issues in the project area?	I I-167.28
Has the project considered the potential increase in demand for public services?	I I-167.29
What measures are in place to address potential strain on local infrastructure?	I I-167.30
How will the project impact the availability of affordable housing in the area?	I I-167.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-167.32

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How will the project impact the local schools and educational facilities?	I I-167.33
Has the project considered the potential impact on healthcare services in the area?	I I-167.34
What measures are in place to address potential emergency response challenges?	I I-167.35
Are there any plans to mitigate the project's impact on nearby recreational areas?] 1-167.36
How will the project impact the overall sense of community in the area?] 1-167.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-167.38
What measures are in place to address potential safety hazards from increased air traffic?] I-167.39
How will the project impact the local flora and fauna in the area?	I I-167.40
Are there any plans to mitigate the project's impact on migratory bird populations?] 1-167.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	-167.42
What measures are in place to address potential water pollution from airport operations?	I I-167.43
How will the project impact the overall biodiversity of the area?	I I-167.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-167.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-167.46
What measures are in place to promote sustainable aviation practices?	I I-167.47
How will the project impact the overall carbon footprint of the region?	I I-167.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I I-167.49
Has the project considered the potential impact of increased aviation activities on local weather patterns?	1-167.50
What measures are in place to address potential climate change effects from airport operations?	I I-167.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	1-167.52

Sincerely,

Linda Mae Baker (909) 223-3551 10941 Cochran Ave. Riverside 92505

Page 3 of 4 in Comment Letter I-167

mamabaker51@gmail.com

Sent from my iPhone

Page 4 of 4 in Comment Letter I-167

Response to Comment Letter I-167

Linda Baker July 22, 2024

I-167.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-167.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-167.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-167.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-167.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-167.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-167.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-167.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-167.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-167.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-167.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-167.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-167.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-167.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-167.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-167.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-167.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-167.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-167.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-167.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-167.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-167.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-167.23 This comment is FAQ-POP-9. Please see the response to FAQ-POP-9. I-167.24 This comment is FAQ-POP-3. Please see the response to FAQ-POP-3. I-167.25 This comment is FAQ-POP-4. Please see the response to FAQ-POP-4. I-167.26 This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3. I-167.27 This comment is FAQ-LU-3. Please see the response to FAQ-LU-3. I-167.28 This comment is FAO-EJ-7. Please see the response to FAO-EJ-7. I-167.29 This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1. I-167.30 This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4. I-167.31 This comment is FAQ-POP-7. Please see the response to FAQ-POP-7. I-167.32 This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1. I-167.33 This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3. I-167.34 This comment is FAO-PUB-8. Please see the response to FAO-PUB-8. I-167.35 This comment is FAO-PUB-2. Please see the response to FAO-PUB-2. I-167.36 This comment is FAQ-REC-2. Please see the response to FAQ-REC-2. I-167.37 This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAO-MISC-9. I-167.38 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-167.39 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-167.40 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-167.41 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-167.42 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-167.43 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-167.44 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-167.45 This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7. I-167.46 This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- **I-167.47** This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
- **I-167.48** This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
- **I-167.49** This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- **I-167.50** This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- **I-167.51** This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- **I-167.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-168

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Lee Bayer < lbayer620@gmail.com>

Mon 7/22/2024 9:14 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-168.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	I I-168.2
Are there any endangered species in the project area that could be affected?	I I-168.3
What measures are in place to protect water quality in the surrounding areas?	I I-168.4
Has the potential impact on groundwater been thoroughly assessed?	I I-168.5
Are there any plans to mitigate the project's impact on air quality?	I I-168.6
How will the project affect the overall noise levels in the area?	I I-168.7

What steps will be taken to minimize light pollution from the project?	I I-168.8
Has the project considered the long-term effects on climate change?	I I-168.9
Are there any plans for sustainable energy use in the project?	I I-168.10
How will the project impact local traffic patterns and congestion?	I -168.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I I-168.12
Has the project considered the potential increase in accidents due to increased traffic?	I I-168.13
Are there any plans to improve public transportation access to the project site?] -168.14
How will the project impact the quality of life for nearby residents?	I I-168.15
What measures are in place to address potential health risks associated with the project?] -168.16
Has the project considered the cumulative impact of other nearby developments?	I I-168.17
Are there any plans to address potential environmental justice concerns in the project area?] -168.18
How will the project affect the visual aesthetics of the surrounding area?	I -168.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-168.20
Has the project considered the impact on property values in the surrounding area?	I -168.21
What measures are in place to address potential soil contamination from the project?	I-168.22
How will the project impact the local economy and job market?	I I-168.23
Are there any plans to mitigate the project's impact on local businesses?	I I-168.24
Has the project considered the potential displacement of residents or businesses?	I -168.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-168.26
How will the project impact the overall community cohesion and social dynamics?	I I-168.27
Are there any plans to address potential gentrification issues in the project area?] -168.28
Has the project considered the potential increase in demand for public services?] -168.29
What measures are in place to address potential strain on local infrastructure?] -168.30
How will the project impact the availability of affordable housing in the area?] -168.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-168.32

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How will the project impact the local schools and educational facilities?	I I-168.33
Has the project considered the potential impact on healthcare services in the area?] 1-168.34
What measures are in place to address potential emergency response challenges?] -168.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	I I-168.36
How will the project impact the overall sense of community in the area?] 1-168.37
Has the project considered the potential increase in light pollution from the airport operations?] -168.38
What measures are in place to address potential safety hazards from increased air traffic?] 1-168.39
How will the project impact the local flora and fauna in the area?] 1-168.40
Are there any plans to mitigate the project's impact on migratory bird populations?] -168.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I-168.42
What measures are in place to address potential water pollution from airport operations?] 1-168.43
How will the project impact the overall biodiversity of the area?	I I-168.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-168.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-168.46
What measures are in place to promote sustainable aviation practices?	I I-168.47
How will the project impact the overall carbon footprint of the region?] 1-168.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?] -168.49
Has the project considered the potential impact of increased aviation activities on local weather patterns?	I-168.50
What measures are in place to address potential climate change effects from airport operations?] -168.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-168.52

Sincerely,

Lee Bayer 6697 Mission Grove Pkwy N. Riverside, CA 92506 Ibayer620@gmail.com

Sent from my iPad

Page 3 of 3 in Comment Letter I-168

Response to Comment Letter I-168

Lee Bayer July 22, 2024

I-168.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-168.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-168.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-168.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-168.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-168.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-168.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-168.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-168.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-168.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-168.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-168.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-168.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-168.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-168.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-168.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-168.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-168.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-168.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-168.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-168.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-168.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-168.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-168.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-168.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-168.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-168.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-168.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-168.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-168.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-168.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-168.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-168.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-168.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-168.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-168.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-168.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-168.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-168.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-168.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-168.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-168.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-168.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-168.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-168.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-168.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-168.47	This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
I-168.48	This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
I-168.49	This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-168.50	This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-168.51	This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
l-168.52	This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-169

March CARGO Port EIR

daveandlanacall@juno.com <daveandlanacall@juno.com>

Mon 7/22/2024 9:23 AM

To:Jeffrey Smith <smith@marchjpa.com>

Hello- I am writing to request a response to an Mission Grove Pkwy N). Specifically, and in no p	d voice concerns I have regarding the increase in flights proposed near my residence(154 particular order are :	I	-169.1
, , , , , , , , , , , , , , , , , , , ,	 increase in air quality increase in noise pollution negative impact on wildlife/habitat of threatened and endangered species nearby increased danger to residents of neighborhood(increase crash risk comes with 	1	-169.2 -169.3 -169.4 -169.5
increased volume)			
	 -decreased overall quality of life -decreased desirability of neighborhood leading to decreased property values have experienced many of the negative consequences of these types of commercial flights has on prevail once again and do not let commerce take priority over people and their safety in advance. 	\mathbf{H}	-169.6 -169.7 -169.8 -169.9

Respectfully signed,

Lana Call 154 Mission Grove Pkwy N Riverside, CA 92506

Response to Comment Letter I-169

Lana Call July 22, 2024

- **I-169.1** This is a general introductory comment that provides general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-169.2 This comment raises general concerns regarding air quality. Impacts to air quality are addressed in Section 3.1, Air Quality, of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-169.3 This comment raises general concerns regarding noise. Noise impacts are addressed in Section 3.11, Noise, of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-169.4 This comment raises general concerns regarding threatened and endangered species in the vicinity of the Proposed Project. Impacts to biological resources are addressed in Section 3.3, Biological Resources, of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- In this comment raises general concerns regarding danger to the neighborhood in relation to airplane crashes. Section 3.8, Hazards and Hazardous Materials, of the EIR adequately analyzed the Proposed Project's potential impacts related to safety hazards within an airport land use plan, as required by CEQA. Generally, the potential for plane crashes onto the project site is too speculative to predict in the environmental analysis. However, existing regulations and land use planning (i.e., ALUCPs) assist in providing parameters for such events. The project site is not located within the Accident Potential Zone of the March ARB/Inland Port Airport ALUCP. As such, required consistency with the ALUCP and subsequent ALUC review prior to project approval provide regulatory compliance for safety risks within the vicinity of an airport. Moreover, the EIR's analysis demonstrates the Proposed Project would not exacerbate existing safety risk. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. Airplane crashes are not required to be analyzed per CEQA.
- **I-169.6** This comment raises general concerns regarding overall quality of life. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- In this comment raises general concerns regarding a decrease in property values as a result of the Proposed Project. As discussed in Effects of Aircraft Noise: Research Update on Select Topics, 127 "[t]he studies of the effects of aviation noise on property values are highly complex owing to the differences in methodologies, airport and community environments, market conditions, and demand variables involved. Whereas most studies concluded that aviation noise effects on property value range from some negative impacts to significant negative impacts, some studies combined airport noise and proximity and concluded that the net effect on property value was positive." The comment does not

¹²⁷ National Academies of Sciences, Engineering, and Medicine. 2008. Effects of Aircraft Noise: Research Update on Select Topics. Washington, DC: The National Academies Press. https://doi.org/10.17226/14177.

raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- In this comment raises concerns regarding the negative impacts of the 2005–2008 DHL cargo flights. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s. As of 2024, there were fewer than 20 DC-9s still in service. Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project. The Proposed Project is separate from the 2005–2008 DHL cargo flights, which are no longer occurring. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- **I-169.9** This comment provides general opposition to the Proposed Project in relation to increasing commerce in exchange for public safety. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

 $^{{}^{128} \}quad \text{https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation} \\$

https://simpleflying.com/dc-9-operators-2024/

¹³⁰ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

Comment Letter I-170

Eden Vitakis

From: Sent: To: lajanique0@gmail.com

Monday, July 22, 2024 3:41 PM Jeffrey Smith; +CBFCentury@aol.com

Subject:

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH

2021040012)

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-170.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?	I I-170.2
Are there any plans to monitor and report on air quality data in real-time?	I I-170.3
Has the project considered the potential health risks associated with poor air quality?	I I-170.4
What measures are in place to address potential respiratory issues from increased air pollution?	I I-170.5
How will the project impact the overall noise levels in the region?	I I-170.6
Are there any plans to implement noise mitigation strategies for affected communities?	I I-170.7
Has the project considered the potential disruption to local wildlife from increased noise pollution?	I I-170.8
What measures are in place to address potential sleep disturbances from airport operations?] -170.9
How will the project impact the overall light pollution in the region?	I I-170.10

1

Are there any plans to implement dark sky initiatives to reduce light pollution?	I I-170.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?] -170.12
What measures are in place to address potential light trespass issues for nearby residents?] -170.13
How will the project impact the overall water quality in the region?] -170.14
Are there any plans to prevent water contamination from airport operations?] -170.15
Has the project considered the potential runoff and drainage issues from the project site?] -170.16
What measures are in place to address potential water scarcity concerns in the area?	I I-170.17
How will the project impact the overall soil quality in the region?] -170.18
Are there any plans to prevent soil erosion and degradation from construction activities?] -170.19
Has the project considered the potential contamination of soil from hazardous materials?	I-170.20
What measures are in place to address potential soil remediation needs in the area?	I -170.21
How will the project impact the overall traffic congestion in the region?] -170.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?	I-170.23
Has the project considered the potential increase in accidents from congested roadways?] -170.24
What measures are in place to address potential traffic management challenges?	I I-170.25
How will the project impact the overall public transportation system in the region?] -170.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-170.27
Has the project considered the potential strain on public transportation services?] -170.28
What measures are in place to address potential accessibility issues for public transit users?] -170.29
How will the project impact the overall community health and safety in the region?] -170.30
Are there any plans to promote healthy living initiatives for residents in the area?] I-170.31
Has the project considered the potential health risks associated with increased pollution?] -170.32
What measures are in place to address potential emergency response needs for the community?] -170.33
How will the project impact the overall community resilience to environmental hazards?] -170.34
Are there any plans to implement disaster preparedness programs for the community?] -170.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-170.36

2

Page 2 of 3 in Comment Letter I-170

What measures are in place to address potential public health crises in the region?	I I-170.37
How will the project comply with local, state, and federal environmental regulations?	I-170.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I -170.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-170.40
What measures are in place to address potential regulatory violations during the project?	I I-170.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-170.42
Are there any plans to monitor and evaluate the project's environmental performance over time] I-170.43
Has the project considered the potential need for adaptive management strategies?	Ī I-170.44
What measures are in place to promote environmental education and awareness in the commun	nity? [I-170.45
How will the project engage with stakeholders and the public to address environmental concerns	- 5?
Are there any plans to establish a community advisory board for ongoing environmental oversigh	
Has the project considered the potential need for independent environmental audits and reviews	
What measures are in place to ensure transparency and accountability in environmental reporting	
How will the project address any unforeseen environmental challenges or emergencies?	T I-170.50
Are there any plans to establish a contingency fund for environmental mitigation efforts?] I-170.51
Thank you for your attention to these critical issues. I look forward to your response and further can effectively address these concerns.	

Sincerely,

[LaJanique Favors] [9512170942] [1170 Brasado way riverside ca 92508] Lajanique0@gmail.com]

Sent from my iPhone

3

Page 3 of 3 in Comment Letter I-170

Response to Comment Letter I-170

LaJanique Favors July 22, 2024

I-170.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-170.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-170.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-170.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-170.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-170.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-170.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-170.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-170.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-170.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-170.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-170.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-170.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-170.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-170.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-170.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-170.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-170.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-170.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-170.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-170.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-170.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

I-170.23 This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4. 1-170.24This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6. I-170.25 This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15. I-170.26 This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12. I-170.27 This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2. I-170.28 This comment is FAO-TRA-7. Please see the response to FAO-TRA-7. I-170.29 This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14. I-170.30 This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9. I-170.31 This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3. I-170.32 This comment is recorded as FAO-AO-4 and FAO-HAZ-73. Please see the responses to FAO-AO-4 and FAQ-HAZ-73. 1-170.33This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4. I-170.34 This comment is FAO-HAZ-35. Please see the response to FAO-HAZ-35. I-170.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10. 1-170.36This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6. I-170.37 This comment is FAO-MISC-10. Please see the response to FAO-MISC-10. I-170.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7. I-170.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1. I-170.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4. I-170.41 This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9. I-170.42 This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11. I-170.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3. 1-170.44This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5.

This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

I-170.45

This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8. I-170.46 I-170.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2. I-170.48 This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6. I-170.49 This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12. I-170.50 This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5. I-170.51 This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2. I-170.52 This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

1-171.1

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Lala Fa <drsmithfavors@gmail.com>

on communities surrounding the Air Force Base.

Mon 7/22/2024 3:22 PM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?	I I-171.2
Are there any plans to monitor and report on air quality data in real-time?	I I-171.3
Has the project considered the potential health risks associated with poor air quality?	I I-171.4
What measures are in place to address potential respiratory issues from increased air pollution?	<u>I</u> I-171.5
How will the project impact the overall noise levels in the region?	<u>I</u> I-171.6
Are there any plans to implement noise mitigation strategies for affected communities?	I I-171.7
Has the project considered the potential disruption to local wildlife from increased noise pollution?	I I-171.8
What measures are in place to address potential sleep disturbances from airport operations?	I I-171.9
How will the project impact the overall light pollution in the region?	I I-171.10
Are there any plans to implement dark sky initiatives to reduce light pollution?	I I-171.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?	I I-171.12
What measures are in place to address potential light trespass issues for nearby residents?	I I-171.13
How will the project impact the overall water quality in the region?	I I-171.14
Are there any plans to prevent water contamination from airport operations?	I I-171.15
Has the project considered the potential runoff and drainage issues from the project site?	I I-171.16

DECEMBER 2025

What measures are in place to address potential water scarcity concerns in the area?	I I-171.17
How will the project impact the overall soil quality in the region?	I I-171.18
Are there any plans to prevent soil erosion and degradation from construction activities?	I I-171.19
Has the project considered the potential contamination of soil from hazardous materials?	I I-171.20
What measures are in place to address potential soil remediation needs in the area?	I I-171.21
How will the project impact the overall traffic congestion in the region?	I I-171.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?	I I-171.23
Has the project considered the potential increase in accidents from congested roadways?	I I-171.24
What measures are in place to address potential traffic management challenges?	I I-171.25
How will the project impact the overall public transportation system in the region?	I I-171.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-171.27
Has the project considered the potential strain on public transportation services?	I I-171.28
What measures are in place to address potential accessibility issues for public transit users?	I I-171.29
How will the project impact the overall community health and safety in the region?	I I-171.30
Are there any plans to promote healthy living initiatives for residents in the area?	I I-171.31
Has the project considered the potential health risks associated with increased pollution?	I I-171.32
What measures are in place to address potential emergency response needs for the community?	I I-171.33
How will the project impact the overall community resilience to environmental hazards?	I I-171.34
Are there any plans to implement disaster preparedness programs for the community?	I I-171.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-171.36
What measures are in place to address potential public health crises in the region?	I I-171.37
How will the project comply with local, state, and federal environmental regulations?	I I-171.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I I-171.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-171.40
What measures are in place to address potential regulatory violations during the project?	I I-171.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-171.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I I-171.43
Has the project considered the potential need for adaptive management strategies?	I I-171.44
What measures are in place to promote environmental education and awareness in the community?	I I-171.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-171.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	I I-171.47
Has the project considered the potential need for independent environmental audits and reviews?	I I-171.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I 1-171.49

Page 2 of 3 in Comment Letter I-171

How will the project address any unforeseen environmental challenges or emergencies?

I I-171.50

Are there any plans to establish a contingency fund for environmental mitigation efforts?

I I-171.51

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

| 1-171.52

Sincerely,

LaShaun Favors 1170 Brasado Way, Riverside, CA 92508 <u>Drsmithfavors@gmail.com</u>

Page 3 of 3 in Comment Letter I-171

Response to Comment Letter I-171

LaShuan Favors July 22, 2024

I-171.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-171.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-171.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-171.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-171.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-171.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-171.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-171.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-171.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-171.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-171.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-171.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-171.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-171.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-171.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-171.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-171.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-171.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-171.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-171.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-171.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-171.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

- I-171.23 This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4.
- **I-171.24** This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6.
- **I-171.25** This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15.
- **I-171.26** This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12.
- **I-171.27** This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2.
- **I-171.28** This comment is FAQ-TRA-7. Please see the response to FAQ-TRA-7.
- **I-171.29** This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14.
- **I-171.30** This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9.
- **I-171.31** This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3.
- **I-171.32** This comment is recorded as FAQ-AQ-4 and FAQ-HAZ-73. Please see the responses to FAQ-AQ-4 and FAQ-HAZ-73.
- **I-171.33** This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4.
- I-171.34 This comment is FAO-HAZ-35. Please see the response to FAO-HAZ-35.
- I-171.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10.
- I-171.36 This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6.
- I-171.37 This comment is FAQ-MISC-10. Please see the response to FAQ-MISC-10.
- I-171.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7.
- I-171.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1.
- I-171.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4.
- **I-171.41** This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9.
- **I-171.42** This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11.
- I-171.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3.
- **I-171.44** This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5.
- I-171.45 This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

- I-171.46 This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8.
- I-171.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2.
- **I-171.48** This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6.
- **I-171.49** This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12.
- **I-171.50** This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5.
- **I-171.51** This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2.
- **I-171.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Eden Vitakis

 From:
 L S <nichole19161@gmail.com>

 Sent:
 Monday, July 22, 2024 5:00 PM

 To:
 Jeffrey Smith; +CBFCentury@aol.com

Subject: Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH

2021040012)

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I believe this DEIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

4.1.1: The trip generational model does not have any trip generation rates for an air flight center. It states it used data from a "similar" facility. What facility is that? Does that facility have the same makeup as the communities surrounding March AFB that it would even be a good comparison for the trip model? I doubt it. It also stated that this trip generational model was conducted during covid, hense making it inaccurate based just on that. It was also based off of only 6 flights a day. How is that a similar comparison?

Can the report provide more information on the quantification of refrigerant emissions from air-conditioning equipment during regular operation and routine servicing over the equipment lifetime, as mentioned in the report?

How does the project ensure consistency with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard to meet the required standards and guidelines for sustainable development and energy efficiency?

What specific goals and policies from the Local March Joint Powers Authority General Plan are being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?

1-172.1

I-172.2

1-172.3

1-172.4

1-172.5

I-172.6

I-172.7

1

How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	I-172.8
What measures are being taken to reduce emissions associated with the transportation of goods and vehicles related to the Proposed Project, as mentioned in the report?	I-172.9
How does the project plan to address emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment?	I-172.10
Can the report provide more details on the consistency evaluation of the Proposed Project with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard?	I-172.11
What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid waste diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or after 2020 and annually thereafter?	I-172.12
How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and emissions criteria?	1-172.13
What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	1-172.14
Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	l-172.15
How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	-172.16
What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment to minimize environmental impact?	-172.17
How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft-related operational emissions, including the refueling of aircraft and the associated GHG emissions, as modeled using AEDT Version 3C in the report?	1-172.18
Can the report provide more information on the quantification of refrigerant emissions from air-conditioning equipment during regular operation and routine servicing over the equipment lifetime, as mentioned in the report?	l-172.19

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How does the project ensure consistency with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard to meet the required standards and guidelines for sustainable development and energy efficiency?	I-172.20
What specific goals and policies from the Local March Joint Powers Authority General Plan are being considered and incorporated into the Proposed Project to address GHG emissions related to noise and air quality?	I-172.21
How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	I-172.22
What measures are being taken to reduce emissions associated with the transportation of goods and vehicles related to the Proposed Project, as mentioned in the report?	1-172.23
How does the project plan to address emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment?	-172.24
Can the report provide more details on the consistency evaluation of the Proposed Project with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard?	I-172.25
What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid waste diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or after 2020 and annually thereafter?	I-172.26
How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development of new combined heat and power systems in California with specific efficiency and emissions criteria?	I-172.27
What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the water use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	I-172.28
Can the report provide more details on how the project aligns with the goals and policies outlined in the Local March Joint Powers Authority General Plan, specifically related to reducing emissions associated with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	I-172.29
How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	1-172.30
What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment to minimize environmental impact?	-172.31

Page 3 of 5 in Comment Letter I-172

How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft-related opera emissions, including the refueling of aircraft and the associated GHG emissions, as modeled using Version 3C in the report?	
Can the report provide more information on the quantification of refrigerant emissions from air-conditioning equipment during regular operation and routine servicing over the equipment lifetime mentioned in the report?	e, as I-172.33
How does the project ensure consistency with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard to meet the required standards and guidelines for sustainable development and energy efficiency?	
What specific goals and policies from the Local March Joint Powers Authority General Plan are bei considered and incorporated into the Proposed Project to address GHG emissions related to noise air quality?	
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What measures are being taken to reduce emissions associated with the transportation of goods a vehicles related to the Proposed Project, as mentioned in the report?	and [I-172.37
How does the project plan to address emissions associated with on-site operational equipment, s yard tractors, and what fuel types are being considered for these equipment?	such as I-172.38
Can the report provide more details on the consistency evaluation of the Proposed Project with regulatory programs such as	I-172.39
What specific strategies and initiatives are outlined in the report to ensure compliance with the California Integrated Waste Management Act of 1989 and AB 341 requirements regarding solid wa diversion and recycling targets, especially concerning the diversion of 75% of all solid waste on or 2020 and annually thereafter?	117970
How does the project intend to adhere to the Waste Heat and Carbon Emissions Reduction Act guidelines outlined in Assembly Bill 1613, particularly focusing on encouraging the development o combined heat and power systems in California with specific efficiency and emissions criteria?	of new [-172.41
What measures are being taken by the Meridian D-1 Gateway Aviation Center Project to meet the use efficiency goals set by the Water Conservation Act of 2009 (Senate Bill X7-7), including the requirement to reduce per capita urban water use by 20% by December 31, 2020?	water [I-172.42
Can the report provide more details on how the project aligns with the goals and policies outlined Local March Joint Powers Authority General Plan, specifically related to reducing emissions associately with vehicle/engine use and encouraging the use of energy-efficient equipment and design in the planning area?	

How are operational emissions, including CO2, CH4, and N2O, being managed and mitigated by the Proposed Project, especially concerning energy consumption, water supply treatment, and solid waste sources?	I-172.44
What specific measures are being implemented to reduce emissions associated with on-site operational equipment, such as yard tractors, and what fuel types are being considered for these equipment to minimize environmental impact?	I-172.45
How does the Meridian D-1 Gateway Aviation Center Project plan to address aircraft-related operational emissions, including the refueling of aircraft and the associated GHG emissions, as modeled using AEDT Version 3C in the report?	I-172.46
Can the report provide more information on the quantification of refrigerant emissions from air-conditioning equipment during regular operation and routine servicing over the equipment lifetime, as mentioned in the report?	I-172.47
How does the project ensure consistency with regulatory programs such as California Title 24 Green Building Standards Code and Senate Bill X1-2 Renewables Portfolio Standard to meet the required standards and guidelines for sustainable development and energy efficiency?	I-172.48
Thank you for your attention to these critical issues. I look forward to your response and further community engagement discussions on how we can effectively address these concerns.	I-172.49
C' I	

Sincerely,

Laura Sandidge Mission Grove 19161 Vintage Woods Drive Riverside Ca 92508 nichole19161@gmail.com

5

Response to Comment Letter I-172

Laura Sandidge July 22, 2024

- I-172.1 This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
- I-172.2 This comment alleges the Project Traffic Analysis (Appendix M-1) did not utilize a trip generation rate for an air flight center. As discussed in the Project Traffic Analysis, the ITE Trip Generation Manual (10th Edition, 2017) does not currently have any trip generation rates for an air freight cargo center; as such, trip generation estimates for the Proposed Project were developed using data collected at a similar facility with operations similar to those proposed.
- I-172.3 This comment questions what facility was used to develop the Proposed Project's trip generation. The Traffic Analysis (Appendix M-1) trip generation estimates were appropriately developed using empirical data collected at an existing March ARB/Inland Port Airport facility with operations similar to those proposed by the Proposed Project. In summary, driveway counts were collected at the existing facility, reflecting the number of trips entering and exiting that site. The number of trips is proportional to the number of facility aircraft parking positions. This empirical data was then interpolated to reflect the scope and configuration of the Proposed Project, including the number of aircraft parking positions proposed. Please refer also to the detailed discussion of trip generation presented in the Traffic Analysis (Appendix M-1.1, Traffic Study Scoping Agreement, Scoping Agreement pp. 2, 3, and Appendix 1.1, pp. 1.1-8 and 1.1-9). The Traffic Analysis trip generation methodology is based on the best available information and reflects the practical and professional judgment of the Traffic Analysis traffic engineers and March JPA. The Traffic Analysis and its assumptions, evaluations, and conclusions have been independently reviewed by third-party experts and determined to be adequate and accurate in all respects.
- I-172.4 This comment questions the accuracy of data collected during the pandemic. This is specifically recognized in the Traffic Analysis Scoping Agreement (Appendix 1.1, p. 1.1-10), as summarized below:

Due to the currently ongoing COVID-19 pandemic, information for Existing (2020) conditions cannot be developed based on current traffic counts. As such, historic traffic count data is proposed to be utilized in conjunction with the application of a growth factor (2% per year) to represent the baseline traffic conditions.

Additionally, as explained in the Traffic Analysis (Appendix M-1), because the traffic counts for the existing March ARB/Inland Port Airport facility were conducted during the COVID-19 pandemic, the data collected may actually overstate this facility's typical operations. This is due to the increase in online shopping in comparison to pre-COVID conditions, with correlating increases in air freight operations and traffic in and out of the site (p. 63). The Traffic Analysis (Appendix M-1) accounts for pandemic-related traffic anomalies and accurately establishes baseline traffic conditions.

- **I-172.5** This comment is FAQ-GHG-4. Please see the response to FAQ-GHG-4.
- I-172.6 This comment is FAQ-ENG-5. Please see the response to FAQ-ENG-5.

- I-172.7 This comment is recorded as FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13. Please see the responses to FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13.
 I-172.8 This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
- **I-172.9** This comment is FAQ-AQ-12. Please see the response to FAQ-AQ-12.
- **I-172.10** This comment is FAQ-AQ-8. Please see the response to FAQ-AQ-8.
- **I-172.11** This comment is FAQ-ENG-4. Please see the response to FAQ-ENG-4.
- **I-172.12** This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6.
- **I-172.13** This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5.
- **I-172.14** This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3.
- **I-172.15** This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAQ-LU-1.
- **I-172.16** This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7.
- **I-172.17** This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15.
- I-172.18 This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10.
- I-172.19 This comment is FAO-GHG-4. Please see the response to FAO-GHG-4.
- I-172.20 This comment is FAO-ENG-5. Please see the response to FAO-ENG-5.
- I-172.21 This comment is recorded as FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13. Please see the responses to FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13.
- **I-172.22** This comment is FAO-AO-7. Please see the response to FAO-AO-7.
- **I-172.23** This comment is FAQ-AQ-12. Please see the response to FAQ-AQ-12.
- I-172.24 This comment is FAO-AO-8. Please see the response to FAO-AO-8.
- **I-172.25** This comment is FAQ-ENG-4. Please see the response to FAQ-ENG-4.
- **I-172.26** This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6.
- **I-172.27** This comment is FAQ-GHG-5. Please see the response to FAQ-GHG-5.
- I-172.28 This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3.
- I-172.29 This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAQ-LU-1.

I-172.30 This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7. I-172.31 This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15. I-172.32 This comment is FAQ-GHG-10. Please see the response to FAQ-GHG-10. I-172.33 This comment is FAQ-GHG-4. Please see the response to FAQ-GHG-4. I-172.34 This comment is FAQ-ENG-5. Please see the response to FAQ-ENG-5. I-172.35 This comment is recorded as FAO-AO-16, FAO-GHG-14, FAO-LU-6, and FAO-NOI-13. Please see the responses to FAQ-AQ-16, FAQ-GHG-14, FAQ-LU-6, and FAQ-NOI-13. I-172.36 This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7. I-172.37 This comment is FAO-AO-12. Please see the response to FAO-AO-12. I-172.38 This comment is FAQ-AQ-8. Please see the response to FAQ-AQ-8. I-172.39 This comment is FAQ-ENG-4. Please see the response to FAQ-ENG-4. I-172.40 This comment is FAQ-UTL-6. Please see the response to FAQ-UTL-6. I-172.41 This comment is FAO-GHG-5. Please see the response to FAO-GHG-5. I-172.42 This comment is FAQ-UTL-3. Please see the response to FAQ-UTL-3. I-172.43 This comment is recorded as FAQ-ENG-3 and FAQ-LU-1. Please see the responses to FAQ-ENG-3 and FAO-LU-1. I-172.44 This comment is FAQ-AQ-7. Please see the response to FAQ-AQ-7. I-172.45 This comment is FAQ-AQ-15. Please see the response to FAQ-AQ-15. I-172.46This comment is FAO-GHG-10. Please see the response to FAO-GHG-10. I-172.47 This comment is FAQ-GHG-4. Please see the response to FAQ-GHG-4. I-172.48 This comment is FAQ-ENG-5. Please see the response to FAQ-ENG-5. I-162.49 This comment is conclusory in nature. The comment raises no specific issues, questions or concerns about the analysis in the EIR.

Eden Vitakis

 From:
 L S <nichole19161@gmail.com>

 Sent:
 Monday, July 22, 2024 4:15 PM

To: Jeffrey Smith

Subject: Public comment- DEIR Meridian D-1 Gateway Aviation Center Project SCH #

2021040012

RE: Public comment- DEIR Meridian D-1 Gateway Aviation Center Project SCH # 2021040012

Good morning. This email letter serves as my official comment/concern/questions over the Meridian D-1 Gateway Aviation Center Project Draft Environmental Impact Report.

I-173.2

1-173.1

I OPPOSE this project. The March JPA manages millions of *taxpayer dollars* and makes decisions <u>influencing the quality of life</u> for county residents. This proposed aviation center is not a wise decision and will diminish the quality of life for many residents in Riverside, Perris and Moreno Valley. Enough is enough.

I-173.3

I have owned my home for 28 years in the Mission Grove Riverside 92508 neighborhood, which is in the flight path of MAFB zone C2 bordering C1. As it stands now, if a plane from the base is flying over my house, it is so loud, I have to stop my conversations with others. I can not imagine how my quality of life will be affected if I have to stop my conversations up to 57 times a day for cargo airplanes if this project is approved. That is unacceptable. When we bought homes in the flight zones, we were fine with supporting and accepting military flights, but this project is clearly about money over the safety, health and quality of life for the surrounding communities, many of which are environmental justice communities. March JPA has already ruined our communities by allowing so many warehouses that are clogging our roads, emitting pollution, greenhouse gasses, noise pollution, road damage, etc. Enough is Enough.

I-173.5

1-173.4

I attended the community meeting at WMWD on July 1st, 2024. It was a terrible outreach meeting as the developer representative, Timothy Reeves, was not helpful with answering the various community members questions. He also clearly did not want to be there nor did he care about our concerns. This is not a developer we can trust. It was very concerning when a UPS worker spoke at the meeting. He works around all the warehouses that MJPA approved, which all stated in their individual Environmental Impact Reports that the trucks are not supposed to idle over 3 minutes. He said that ALL the trucks stay idling for extreme amounts of time and no one cares or is monitoring it. When the UPS worker said this to the Developer rep Reeves, he did not care. Mr. Reeves stated they just have to put that in all Environmental Impact Reports and laughed. Wow. The residents expect these rules to be followed, yet neither MJPA or the developer care after they all get their money. This is why there is no trust MJPA will do the right thing if this project moves forward. Additionally, the scathing report from the Riverside Grand Jury did not boast confidence that the MJPA will do the right thing or be transparent.

1-173.6

MAFB is in no danger of closing since getting awarded to be the home of the 12 KC 46A Pegasus aerial refueling planes.

I-173.7

My questions are as follows:

1

9T.E71-I ↓	3.7 Greenhouse Gas Emissions conclusion states that more than 90% of the greenhouse gas emissions in the proposed project will be aircraft operations and there are no feasible mitigation measures to
ST.871-I	3.2 Air Quality- Under AQMP consistency, and even with your mitigation (MM-AQ3-6), the emissions will still exceed the thresholds. That is unacceptable. That alone should be a reason to not approve this project.
₽ Т.≅71-I	3.2 Air Quality- Table3.2-1 Project Site Air Quality Monitoring is based off of data from up to 2022. There needs to be an updated study because there has been many more warehouses that have been built in the last two years, all creating additional poor air quality according to all their environmental impact reports.
ET.E71-I	3- Environmental Analysis: Table 3-1 (cumulative projects) for the City of Riverside does not show a 347 unit five building four story multi family apartment complex (Mission Grove Apartments). This is important and should be added, especially under hazards because this project was denied by the Airport Land Use Commission due to the high density and being in a flight zone. This project just passed the Riverside Planning Commission. Adding that many more flights will be a safety hazard if this apartment complex moves forward at 34DU/AC inside of the areas 6DU/AC.
ZT.871-I	In your Executive Summary ES.4.1, it is stated there will be an average of 17 two way flights per day, nothing equaling 34 flights per day. Under Project Operations 2.4.2, it states 17 average flights per day, nothing about equaling 34 flights as stated in the Executive Summary. Which one is it?
TT.E71-1	3.12 Transportation TRA-1. MM-TRA-2 States that the project applicant shall ensure the designated truck routes are followed. This has been a massive failure with the warehouses this developer opened. Multiple 4 axle semi trucks are using the city of Riverside's atreets that have banned 4 axle trucks (Alessandro, Arlington, Central, Van Buren, Trauitwein, etc). They rarely have Riverside County Sheriff conduct enforcement around the warehouses. Who is going to enforce it with whoever gets the cargo business at the airport? Amazon is one of the offenders. These truck drivers will go down whatever streets they want to avoid the gridlocked 215 freeway. How will this be stopped?
OT.871-I	3.7- Greenhouse Gas Emissions (GHG-1) This states the project will create potentially significant greenhouse emissions. Your mitigation measure (MM-GHG-1) measure states in bold "installation of EV charging stations are going to be installed. Shouldn't MJPA tell them how many chargers are required for this project? How many for installed. Shouldn't MJPA tell them how many chargers are required for this project? How many for tuture trucks and how many for employees?
6.57£-I	3.3-Biological Resources MM-BIO-1A regarding the burrowing owls. Why does the developer get to pick the "qualified biologist" to conduct the pre-construction survey report? The biologist should be picked randomly, maybe by a drawing to ensure the developer does not pick one that they already have a relationship with and who may skew the report in the developers favor abd against the safety and protection of the burrowing owls. Where can the public have access to this biologist report?
8.571-1	3.2- Air Quality - construction requirements (MM-AQ-2)- The list A-1 of specific requirements during construction, such as no trucks shall be idling over 3 minutes, no grading on bad air quality days, etc Who will enforce this? As I stated earlier, a warehouse worker at the community meeting said trucks are idling all day long and no truck driver follows the 3 minute idle requirement. The Developer rep, Mr. Reeves blew off that comment.

Page 2 of 3 in Comment Letter I-173

reduce these emissions. That is unacceptable. That alone is a reason to not approve this project as it is currently proposed with 34+ flights a day on average.	1-173.16 Cont.
3.8 Hazards- (p. 3.8-26) states there will be an average 17 flights per day. This is inconsistent with other areas in the DEIR that state 34 flights a day. Please make it consistent throughout the document.	-173.17
Looking at the Los Of Service at the 12 intersections you covered, the majority are already LOS F. Your mitigation measures are not adequate. Additionally, there were no studies regarding the 215 freeway in that area. As it stands now, that freeway is already constantly gridlocked with semi trucks going to the surrounding warehouses. This DEIR states this project will generate another 1,276 one way trips on non peak times and 1,880 one way trips during peak times. Where do you think all these vehicles from your project will be coming and going from? It's the 215 freeway. There needs to be an analysis of that, which will show it will contribute to significant environmental issues, creating more GHG due to vehicles idling in stopped traffic on the 215. The 215 freeway is a big issue for all residents in the surrounding communities. It is untenable, not to mention the extreme damage that has been caused to our freeway and roads due to all the semi trucks. Why did you not account for these things in your study?	 -173.18
Table 3.11-3 does not mention the KC46A Pegasus under the March ARB aircrafts. Since March got the position for these fuel tankers, you need to add them to this list and also advise how many annual flights they will be doing.	I-173.19
3.11- Project aircraft operation noise: Significant and unavoidable even with feasible mitigation. A big reason why this project should not be approved! How is that being a good neighbor to the taxpayers of Riverside County and the surrounding communities?	I-173.20
5- Alternatives. There was not enough research dedicated to looking at alternatives that would be better for the surrounding communities. Clearly, if you insist on picking a project, alternative three and four would be a better fit for surrounding communities and there is no reason why you can't go those routes and still benefit.	I-173.21
In conclusion, there are just too many significant effects that will affect us, especially with noise, GHG and hazards. March does not need to do this project to be viable, especially after getting awarded the 12 KC-46A aircraft. Thank you.	I-173.22
Laura Sandida	

Laura Sandidge 19161 Vintage Woods Drive Riverside Ca 92508 nichole19161@gmail.com

3

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Response to Comment Letter I-173

Laura Sandidge July 22, 2024

- **I-173.1** This comment is introductory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-173.2 This comment provides general opposition to the Proposed Project and concerns regarding quality of life. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-173.3 The comment expresses general concerns regarding flights not associated with the Proposed Project and about noise. For clarification of terminology, a "flight" is composed of two flight operations: a take-off and a landing. The Project Description has been revised to be clear that, during the non-peak season, there would be a maximum of 17 flights per day and that during the peak season, there would be a maximum of 21 flights per day. It is unclear where the numbers referenced in the comment are from. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR used the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, Mission Grove is outside the 60 dBA contour line. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near Mission Grove. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- I-173.4 This comment expresses opposition to the Proposed Project and the impact on environmental justice communities. As discussed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project would be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element. Where 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. The Proposed Project is sited in a location that would not result in a localized impact to sensitive receptors located in housing, schools, childcare facilities, and hospitals. The nearest sensitive receptor is approximately 0.5 miles east of the project site. As demonstrated in Section 3.2, Air Quality, of the EIR, construction and operational LST (NO₂, CO, PM₁₀, and PM_{2.5}) analyses and the CO hot spot assessment, the Proposed Project is not anticipated to result in localized criteria pollutant impacts.

The rest of this comment is FAQ-AQ-17. Please see the response to FAQ-AQ-17.

I-173.5 This comment expresses opposition to existing warehouses within the area, specifically in regard to warehouse impacts to transportation, air quality, and noise. The comment is not related to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- I-173.6 This comment expresses disappointment with the community meeting held on July 1, 2024, and concern regarding idling relative to UPS vehicles that are not part of the Proposed Project. MM-AQ-4 (Truck Requirements) includes anti-idling measures, specifically anti-idling signs. As included in MM-AQ-4, "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 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 CARB to report violations." This requirement will be enforced through the Mitigation Monitoring and Reporting Program (MMRP).
- I-173.7 This comment states that March ARB is not in danger of closing. The comment does not raise any specific comments, questions, or concerns about the analysis included in the EIR.
- **I-173.8** This comment raises concerns about the enforcement of **MM-AQ-3** (Construction Requirements). This requirement will be enforced through the MMRP.
- I-173.9 This comment questions who will serve as a "qualified biologist" under MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures). As stated in MM-BIO-1A, "For the purposes of this mitigation measure, a 'qualified biologist' is a biologist who meets the requirements set forth in the CDFW 2012 Staff Report on Burrowing Owl Mitigation." The applicant will submit at least one burrowing owl pre-construction survey report to MIPAA and CDFW. The report would be a public record.
- I-173.10 This comment states that MM-GHG-1 does not indicate how many EV chargers will be installed. As detailed in Section 3.7, GHG Emissions, of the EIR, since the Proposed Project would provide 122 parking spaces, 2022 CALGreen would require 6 charging stations; Tier 2 would require 19 charging stations, resulting in a reduction of 146 MT CO₂e per year.
- I-173.11 This comment questions the enforcement of MM-TRA-2. MM-TRA-2 would be enforced through the MMRP. Further, March JPA contracts with the Riverside County Sheriff's Department for 40 hours of patrol service per week, and truck route enforcement is paid for through an existing truck route mitigation fund. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-173.12 This comment raises concerns that the Project Description discusses "average" flights per day but is not clear as to the maximum number of flights per day. The Project Description has been revised to be clear that, during the non-peak season, there would be a maximum of 17 flights per day and that during the peak season, there would be a maximum of 21 flights per day. This revision does not constitute "new information" under CEQA and does not impact the environmental analysis in the EIR.
- I-173.13 This comment discusses the cumulative projects list and the omission of an apartment building. As discussed in Chapter 3, Environmental Analysis, of the EIR, the cumulative project list (Table 3-1) was developed for the purposes of EIR analysis through consultation with planning and engineering staff from March JPA, the City of Riverside, the City of Moreno Valley, the City of Perris, and the County of Riverside to include key projects in their respective jurisdictions. The NOP for the Proposed Project EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021, which is used as the baseline for the EIR. The project identified by the comment was not proposed until October 2022.

- **I-173.14** This comment questions the air quality monitoring data (2022) provided in Table 3.2-1. This table is provided for informational purposes and was not used for analysis.
- I-173.15 This comment urges denial of the Proposed Project because of the significant and unavoidable air quality impacts. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- Inis comment urges denial of the Proposed Project because of emissions generated by the flight operations of the Proposed Project. As discussed in Response I-173.3, a "flight" is composed of two flight operations: a take-off and a landing. The Project Description has been revised to be clear that, during the non-peak season, there would be a maximum of 17 flights per day and that during the peak season, there would be a maximum of 21 flights per day. As discussed in the EIR, aircraft emissions compose the vast majority of the Proposed Project's emissions, and there are no feasible mitigation measures to reduce aircraft emissions because aircraft technology to control emissions has not been developed, although research is ongoing for controlling NO_x and improving fuel efficiencies. Additionally, any potential mitigation measures that would address aircraft emissions would be under the jurisdiction of other agencies, such as FAA or EPA. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-173.17 This comment raises concerns regarding the number of flights per day. As discussed in Response I-173.3, a "flight" is composed of two flight operations: a take-off and a landing. The Project Description has been revised to be clear that, during the non-peak season, there would be a maximum of 17 flights per day and that during the peak season, there would be a maximum of 21 flights per day.
- I-173.18 This comment raises concerns regarding traffic and LOS data that was provided in the EIR. The Project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak-hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. Under SB 743, VMT is the most appropriate measure for transportation impacts. As discussed in Section 3.12, Transportation, the Proposed Project's VMT impact would be less than significant. With implementation of MM-TRA-1 and MM-TRA-2, the Proposed Project's transportation impacts would be less than significant.
- I-173.19 This comment questions the omission of the KC46A Pegasus and its potential flights in and out of March ARB in Table 3.11-3. Table 3.11-3 provides the existing flight operations, both military and civilian. The KC46A aircraft was not yet approved, and its flights were not part of the existing baseline. The KC46A aircraft operations are discussed in the cumulative impacts analysis in Section 3.11, Noise, of the EIR.
- I-173.20 This comment urges denial of the Proposed Project because of the significant and unavoidable aircraft noise determination. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

- I-173.21 This comment requests additional alternatives, but it does not present a specific alternative to the Proposed Project. The EIR considers a reasonable range of alternatives, as further discussed in Chapter 5, Alternatives. In developing the alternatives to be addressed in Chapter 5, consideration was given to the ability to meet the basic objectives of the Proposed Project and eliminate or substantially reduce the identified significant environmental impacts. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-173.22 This comment summarizes earlier comments and general opposition to the Proposed Project.

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Peggy Adaskaveg <padaskaveg@gmail.com>

Mon 7/22/2024 7:25 PM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project ensure that all workers and contractors involved in hazardous materials management are properly trained and equipped?

Are there any provisions for emergency response and contingency planning in case of hazardous materials incidents?

What measures will be taken to prevent the unauthorized release or disposal of hazardous materials during the project?

How will the project ensure that hazardous materials are properly labeled and stored to prevent accidents and spills?

1-174.1

1-174.2

1-174.3

1-174.4

I-174.5

Are there any plans for public education and awareness campaigns regarding hazardous materials and waste management?	I-174.6
What steps will be taken to minimize the environmental impact of hazardous materials on surrounding ecosystems and wildlife?	I-174.7
How will the project address any potential risks to groundwater quality and availability posed by hazardous materials?] -174.8
Are there any provisions for ongoing monitoring and reporting of hazardous materials impacts on the environment?	- I-174.9
What measures will be taken to ensure the safe and responsible disposal of hazardous wastes generated during the project?	I-174.10
How will the project address any potential risks of contamination to nearby water sources from hazardous materials?	I-174.11
Are there any plans for remediation and cleanup of contaminated areas after the project is completed?	I -174.12
What steps will be taken to ensure the long-term sustainability of hazardous materials management practices at the project site?	I-174.13
How will the project address any potential conflicts with neighboring land uses and communities regarding hazardous materials?	 -174.14
Are there any provisions for stakeholder engagement and consultation regarding hazardous materials management practices?	I-174.15
What measures will be taken to ensure the health and safety of workers and residents in the vicinity of the project site?	I I-174.16
How will the project address any potential risks of exposure to hazardous materials for vulnerable populations in the area?	-174.17
Are there any plans for regular health assessments and monitoring of individuals potentially affected by hazardous materials?	-174.18
What steps will be taken to ensure the proper disposal of hazardous materials to prevent long-term health impacts on the community?	I-174.19
How will the project address any concerns raised by local residents regarding hazardous materials management?	I-174.20
Are there any provisions for community outreach and education programs on the risks associated with hazardous materials?	I-174.21
What measures will be taken to ensure the equitable distribution of risks and benefits related to hazardous materials management?	- I-174.22

Page 2 of 4 in Comment Letter I-174

How will the project address any potential conflicts with existing land use regulations and zoning laws regarding hazardous materials?	-174.23
Are there any plans for ongoing collaboration with regulatory agencies and local authorities on hazardous materials management?	I-174.24
What steps will be taken to address any gaps or inconsistencies in the current hazardous materials management plan?	I-174.25
How will the project ensure compliance with all relevant environmental laws and regulations related to hazardous materials?	-174.26
Are there any provisions for regular audits and inspections to verify compliance with hazardous materials management requirements?	-174.27
What measures will be taken to address any unforeseen hazards or risks that may arise during the project's construction and operation?	- I -174.28
How will the project address any potential environmental justice concerns related to hazardous materials and waste management?	I-174.29
Are there any plans in place to involve the local community in decision-making processes regarding hazardous materials and waste management?	I-174.30
What measures will be taken to ensure transparency and accountability in the handling of hazardous materials throughout the project?	-174.31
How will the project address any potential conflicts with existing environmental regulations and guidelines?	-174.32
Are there any provisions for public access to information regarding hazardous materials used, stored, or disposed of at the project site?	1-174.33
What steps will be taken to address any gaps or deficiencies in the current hazardous materials management plan?	-174.34
How will the project ensure that all workers and contractors involved in hazardous materials management are properly trained and equipped?	- I-174.35
Are there any provisions for emergency response and contingency planning in case of hazardous materials incidents?	I-174.36
What measures will be taken to prevent the unauthorized release or disposal of hazardous materials during the project?	I-174.37
How will the project ensure that hazardous materials are properly labeled and stored to prevent accidents and spills?	-174.38

Page 3 of 4 in Comment Letter I-174

Are there any plans for public education and awareness campaigns regarding hazardous materials and waste management?	I -174.39
What steps will be taken to minimize the environmental impact of hazardous materials on surrounding ecosystems and wildlife?	I -174.40
How will the project address any potential risks to groundwater quality and availability posed by hazardous materials?	1-174.41
Are there any provisions for ongoing monitoring and reporting of hazardous materials impacts on the environment?	I-174.42
What measures will be taken to ensure the safe and responsible disposal of hazardous wastes generated during the project?	I -174.43
How will the project address any potential risks of contamination to nearby water sources from hazardous materials?	I I-174.44
Are there any plans for remediation and cleanup of contaminated areas after the project is completed?	1-174.45
What steps will be taken to ensure the long-term sustainability of hazardous materials management practices at the project site?	I -174.46
How will the project address any potential conflicts with neighboring land uses and communities regarding hazardous materials?	I -174.47
Are there any provisions for stakeholder engagement and consultation regarding hazardous materials management practices?	1-174.48
What measures will be taken to ensure the health and safety of workers and residents in the vicinity of the project site?	I-174.49
How will the project address any potential risks of exposure to hazardous materials for vulnerable populations in the area?	I-174.50
Are there any plans for regular health assessments and monitoring of individuals potentially affected by hazardous materials?	I-174.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	1-174.52

Sincerely,

Dr. Peggy Mauk Adaskaveg 951-236-2059 5970 Claridge Dr. Riverside 92506 Padaskaveg@gmail.com Sent from my iPhone

Page 4 of 4 in Comment Letter I-174

Response to Comment Letter I-174

Peggy Adaskaveg July 22, 2024

I-174.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-174.2	This comment is FAQ-HAZ-32. Please see the response to FAQ-HAZ-32.
I-174.3	This comment is FAQ-HAZ-12. Please see the response to FAQ-HAZ-12.
I-174.4	This comment is FAQ-HAZ-56. Please see the response to FAQ-HAZ-56.
I-174.5	This comment is FAQ-HAZ-33. Please see the response to FAQ-HAZ-33.
I-174.6	This comment is FAQ-HAZ-4. Please see the response to FAQ-HAZ-4.
I-174.7	This comment is recorded as FAQ-BIO-23 and FAQ-HAZ-65. Please see the responses to FAQ-BIO-23 and FAQ-HAZ-65.
I-174.8	This comment is recorded as FAQ-HAZ-27 and FAQ-HYD-28. Please see the responses to FAQ-HAZ-27 and FAQ-HYD-28.
I-174.9	This comment is FAQ-HAZ-13. Please see the response to FAQ-HAZ-13.
I-174.10	This comment is FAQ-HAZ-53. Please see the response to FAQ-HAZ-53.
I-174.11	This comment is recorded as FAQ-HAZ-25 and FAQ-HYD-27. Please see the responses to FAQ-HAZ-25 and FAQ-HYD-27.
I-174.12	This comment is FAQ-HAZ-6. Please see the response to FAQ-HAZ-6.
I-174.13	This comment is FAQ-HAZ-63. Please see the response to FAQ-HAZ-63.
I-174.14	This comment is FAQ-LU-2. Please see the response to FAQ-LU-2.
I-174.15	This comment is FAQ-HAZ-16. Please see the response to FAQ-HAZ-16.
I-174.16	This comment is recorded as FAQ-HAZ-51 and FAQ-HYD-30. Please see the responses to FAQ-HAZ-51 and FAQ-HYD-30.
I-174.17	This comment is FAQ-HAZ-26. Please see the response to FAQ-HAZ-26.
I-174.18	This comment is FAQ-HAZ-5. Please see the response to FAQ-HAZ-5.
I-174.19	This comment is FAQ-HAZ-64. Please see the response to FAQ-HAZ-64.
I-174.20	This comment is FAQ-HAZ-22. Please see the response to FAQ-HAZ-22.

I-174.21 This comment is FAQ-HAZ-11. Please see the response to FAQ-HAZ-11. I-174.22 This comment is FAQ-HAZ-50. Please see the response to FAQ-HAZ-50. I-174.23 This comment is FAQ-LU-7. Please see the response to FAQ-LU-7. I-174.24 This comment is FAQ-HAZ-2. Please see the response to FAQ-HAZ-2. I-174.25 This comment is FAQ-HAZ-60. Please see the response to FAQ-HAZ-60. I-174.26 This comment is FAO-HAZ-30. Please see the response to FAO-HAZ-30. I-174.27 This comment is FAQ-HAZ-15. Please see the response to FAQ-HAZ-15. I-174.28 This comment is FAQ-HAZ-49. Please see the response to FAQ-HAZ-49. I-174.29 This comment is FAQ-HAZ-23. Please see the response to FAQ-HAZ-23. I-174.30 This comment is FAO-HAZ-8. Please see the response to FAO-HAZ-8. I-174.31 This comment is FAQ-HAZ-55. Please see the response to FAQ-HAZ-55. I-174.32 This comment is FAO-PROCESS-5. Please see the response to FAO-PROCESS-5. I-174.33 This comment is FAO-HAZ-14. Please see the response to FAO-HAZ-14. I-174.34 This comment is FAQ-HAZ-59. Please see the response to FAQ-HAZ-59. I-174.35 This comment is FAQ-HAZ-32. Please see the response to FAQ-HAZ-32. I-174.36 This comment is FAQ-HAZ-12. Please see the response to FAQ-HAZ-12. I-174.37 This comment is FAQ-HAZ-56. Please see the response to FAQ-HAZ-56. I-174.38 This comment is FAQ-HAZ-33. Please see the response to FAQ-HAZ-33. I-174.39 This comment is FAQ-HAZ-4. Please see the response to FAQ-HAZ-4. I-174.40 This comment is recorded as FAQ-BIO-23 and FAQ-HAZ-65. Please see the responses to FAQ-BIO-23 and FAQ-HAZ-65. I-174.41 This comment is recorded as FAQ-HAZ-27 and FAQ-HYD-28. Please see the responses to FAQ-HAZ-27 and FAQ-HYD-28. I-174.42 This comment is FAQ-HAZ-13. Please see the response to FAQ-HAZ-13.

This comment is FAQ-HAZ-53. Please see the response to FAQ-HAZ-53.

I-174.43

about the analysis in the EIR.

I-174.52

I-174.44 This comment is recorded as FAQ-HAZ-25 and FAQ-HYD-27. Please see the responses to FAQ-HAZ-25 and FAQ-HYD-27. I-174.45 This comment is FAQ-HAZ-6. Please see the response to FAQ-HAZ-6. I-174.46 This comment is FAQ-HAZ-63. Please see the response to FAQ-HAZ-63. I-174.47 This comment is FAQ-LU-2. Please see the response to FAQ-LU-2. I-174.48 This comment is FAQ-HAZ-16. Please see the response to FAQ-HAZ-16. I-174.49 This comment is FAQ-HAZ-51. Please see the response to FAQ-HAZ-51. I-174.50 This comment is FAQ-HAZ-26. Please see the response to FAQ-HAZ-26. I-174.51 This comment is FAQ-HAZ-5. Please see the response to FAQ-HAZ-5.

This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Peggy Adaskaveg <padaskaveg@gmail.com>

Mon 7/22/2024 7:24 PM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-175.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

What specific hazardous materials were historically used, stored, or disposed of at the former March AFB that could impact the project site?

I-175.2

Are there any ongoing monitoring programs in place to track the levels of hazardous materials in the soil, soil gas, and groundwater at the project site?

1-175.3

How will the project address the contamination of chlorinated VOCs, particularly trichloroethylene (TCE), in the soil, soil gas, and groundwater?

1-175.4

What are the potential health risks associated with exposure to PFOS and PFOA in the soil and groundwater at the project site?

I-175.5

How will the project ensure the safety of workers and future occupants in light of the documented soil, soil gas, and groundwater contamination at Site 7?	I-175.6
Are there any plans in place to mitigate the risks associated with PFAS contamination in the soil and groundwater?	I-175.7
What measures will be taken to prevent the spread of contaminated groundwater during construction activities?	- -175.8
How will the project ensure compliance with federal, state, and local regulations regarding the handling, transport, and disposal of hazardous materials?	-175.9
What steps will be taken to protect nearby sensitive receptors, such as housing, schools, hospitals, and childcare facilities, from potential hazards?	1-175.10
Are there any contingency plans in case of accidental release of hazardous materials during construction?	-175.11
How will the project address the potential safety hazards posed by the expansion and modification of the existing southern access roadway?	I-175.12
What measures are in place to prevent the exposure of people or structures to significant risks of loss, injury, or death involving wildland fires?	I-175.13
How will the project ensure that hazardous materials are stored, used, and transported in compliance with relevant regulations?	1-175.14
Are there any plans for the safe removal and disposal of hazardous wastes during construction?] 1-175.15
What role will the California Office of Emergency Services play in overseeing the handling and release of hazardous materials during the project?	1-175.16
How will the project comply with the hazardous substances regulations enforced by the California Occupational Safety and Health Administration?	1-175.17
Are there any specific guidelines in place for the handling of asbestos during construction activities?	I I-175.18
What measures will be taken to ensure the safety of workers exposed to hazardous substances during construction?	1-175.19
How will the project address the potential risks associated with construction activities near contaminated groundwater wells?	- I-175.20
Are there any plans to monitor and manage contaminated groundwater encountered during excavation activities?	1-175.21
What procedures will be followed in case of groundwater contamination during construction?] -175.22
How will the project ensure that contaminated groundwater is properly managed and treated if	↓ I-175.23

encountered during construction?	↑ I-175.23 Cont.
What measures are in place to prevent the disturbance of existing treatment systems (e.g., soil vapor extraction systems) during construction?	I -175.24
How will the project address potential impacts on wildlife, particularly birds, attracted to the project site?	I I-175.25
Are there any specific measures in place to protect wildlife and prevent potential safety risks to aircraft in flight?] 1-175.26
What steps will be taken to incorporate recommendations from the Wildlife Hazard Review into the project design?	I-175.27
How will the project ensure that noise levels are within acceptable limits for nearby land uses?	I I-175.28
Are there any plans to mitigate noise impacts on nearby residential areas during construction and operation?	I I-175.29
What measures will be taken to reduce noise intrusions upon indoor activities within the project site?	I I-175.30
How will the project comply with the California Building Code requirements for interior environmental comfort regarding noise levels?] -175.31
Are there any provisions for providing hearing protection to workers exposed to excessive noise during construction?	I-175.32
What measures are in place to prevent potential safety hazards that could interfere with aircraft operations?] -175.33
How will the project address potential safety risks associated with drainage features and vegetation attracting animals near the active runway?	I-175.34
Are there any specific guidelines for the construction of drainage features and vegetation to minimize safety risks to aircraft?	I-175.35
What steps will be taken to ensure that the project does not exacerbate existing conditions of hazardous materials on the site?	I-175.36
How will the project ensure that impacts associated with hazardous materials are controlled and do not have cumulative effects?	I I-175.37
Are there any plans to monitor and address any cumulative impacts of handling, transporting, and disposing of hazardous materials from nearby projects?	I-175.38
What measures will be taken to ensure that the project does not contribute to cumulative hazards in the area?	I-175.39
How will the project address any potential long-term sustainability issues related to hazardous materials and waste management?] -175.40

Are there any plans for ongoing monitoring and maintenance of hazardous materials after the completion of the project?] 1-175.41
What measures will be taken to ensure the long-term safety and health of workers and occupants in relation to hazardous materials?	I-175.42
How will the project ensure compliance with all relevant environmental regulations throughout the project's lifespan?	I-175.43
Are there any provisions for public access to information regarding hazardous materials used, stored, or disposed of at the project site?	I-175.44
What steps will be taken to address any unforeseen hazards or risks that may arise during the project's construction and operation?	I-175.45
How will the project address any potential environmental justice concerns related to hazardous materials and waste management?	I-175.46
Are there any plans in place to involve the local community in decision-making processes regarding hazardous materials and waste management?	I-175.47
What measures will be taken to ensure transparency and accountability in the handling of hazardous materials throughout the project?	I-175.48
How will the project address any potential conflicts with existing environmental regulations and guidelines?	I-175.49
Are there any provisions for regular audits and inspections to ensure compliance with hazardous materials management requirements?	I-175.50
What steps will be taken to address any gaps or deficiencies in the current hazardous materials management plan?	I-175.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.] 1-175.52

Sincerely,

Dr. Peggy Mauk Adaskaveg 951-236-2059 5970 Claridge Dr. Riverside 92506 Padaskaveg@gmail.com

Sent from my iPhone

Page 4 of 4 in Comment Letter I-175

Response to Comment Letter I-175

Peggy Adaskaveg July 22, 2024

I-175.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-175.2	This comment is FAQ-HAZ-58. Please see the response to FAQ-HAZ-58.
I-175.3	This comment is recorded as FAQ-HAZ-71 and FAQ-HYD-24. Please see the responses to FAQ-HAZ-71 and FAQ-HYD-24.
I-175.4	This comment is recorded as FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29. Please see the responses to FAQ-GEO-9, FAQ-HAZ-76, and FAQ-HYD-29.
I-175.5	This comment is FAQ-HAZ-78. Please see the response to FAQ-HAZ-78.
I-175.6	This comment is FAQ-HAZ-77. Please see the response to FAQ-HAZ-77.
I-175.7	This comment is recorded as FAQ-HAZ-9 and FAQ-HYD-25. Please see the responses to FAQ-HAZ-9 and FAQ-HYD-25.
I-175.8	This comment is FAQ-HYD-22. Please see the response to FAQ-HYD-22.
I-175.9	This comment is FAQ-HAZ-31. Please see the response to FAQ-HAZ-31.
I-175.10	This comment is a question regarding sensitive receptors. Please see the responses to FAQ-AQ-17, FAQ-HAZ-66, and FAQ-NOI-14.
I-175.11	This comment is FAQ-HAZ-1. Please see the response to FAQ-HAZ-1.
I-175.12	This comment is a question regarding safety hazards. Please see the responses to FAQ-HAZ-28 and FAQ-TRA-9.
I-175.13	This comment is FAQ-HAZ-44. Please see the response to FAQ-HAZ-44.
I-175.14	This comment is FAQ-HAZ-34. Please see the response to FAQ-HAZ-34.
I-175.15	This comment is FAQ-HAZ-7. Please see the response to FAQ-HAZ-7.
I-175.16	This comment is FAQ-HAZ-57. Please see the response to FAQ-HAZ-57.
I-175.17	This comment is FAQ-HAZ-29. Please see the response to FAQ-HAZ-29.
l-175.18	This comment is FAQ-HAZ-17. Please see the response to FAQ-HAZ-17.
I-175.19	This comment is FAQ-HAZ-54. Please see the response to FAQ-HAZ-54.
	This confinent is 1 AQ-11AZ-34. Flease see the response to 1 AQ-11AZ-34.

I-175.21	This comment is FAQ-HYD-2. Please see the response to FAQ-HYD-2.
I-175.22	This comment is FAQ-HYD-23. Please see the response to FAQ-HYD-23.
I-175.23	This comment is FAQ-HYD-14. Please see the response to FAQ-HYD-14.
I-175.24	This comment is FAQ-HAZ-43. Please see the response to FAQ-HAZ-43.
I-175.25	This comment is FAQ-BIO-13. Please see the response to FAQ-BIO-13.
I-175.26	This comment is FAQ-BIO-8. Please see the response to FAQ-BIO-8.
I-175.27	This comment is FAQ-BIO-22. Please see the response to FAQ-BIO-22.
I-175.28	This comment is FAQ-NOI-9. Please see the response to FAQ-NOI-9.
I-175.29	This comment is FAQ-NOI-4. Please see the response to FAQ-NOI-4.
I-175.30	This comment is FAQ-NOI-12. Please see the response to FAQ-NOI-12.
I-175.31	This comment is FAQ-NOI-8. Please see the response to FAQ-NOI-8.
I-175.32	This comment is FAQ-NOI-5. Please see the response to FAQ-NOI-5.
I-175.33	This comment is FAQ-HAZ-42. Please see the response to FAQ-HAZ-42.
I-175.34	This comment is FAQ-BIO-14. Please see the response to FAQ-BIO-14.
I-175.35	This comment is FAQ-HAZ-72. Please see the response to FAQ-HAZ-72.
I-175.36	This comment is FAQ-HAZ-62. Please see the response to FAQ-HAZ-62.
I-175.37	This comment is FAQ-HAZ-68. Please see the response to FAQ-HAZ-68.
I-175.38	This comment is FAQ-HAZ-67. Please see the response to FAQ-HAZ-67.
I-175.39	This comment is FAQ-HAZ-69. Please see the response to FAQ-HAZ-69.
I-175.40	This comment is FAQ-HAZ-24. Please see the response to FAQ-HAZ-24.
I-175.41	This comment is FAQ-HAZ-3. Please see the response to FAQ-HAZ-3.
I-175.42	This comment is FAQ-HAZ-52. Please see the response to FAQ-HAZ-52.
I-175.43	This comment is FAQ-PROCESS-6. Please see the response to FAQ-PROCESS-6.
I-175.44	This comment is FAQ-HAZ-14. Please see the response to FAQ-HAZ-14.
I-175.45	This comment is FAQ-HAZ-61. Please see the response to FAQ-HAZ-61.

I-175.46	This comment is FAQ-HAZ-23. Please see the response to FAQ-HAZ-23.
I-175.47	This comment is FAQ-HAZ-8. Please see the response to FAQ-HAZ-8.
I-175.48	This comment is FAQ-HAZ-55. Please see the response to FAQ-HAZ-55.
l-175.49	This comment is FAQ-PROCESS-5. Please see the response to FAQ-PROCESS-5.
I-175.50	This comment is FAQ-HAZ-70. Please see the response to FAQ-HAZ-70.
I-175.51	This comment is FAQ-HAZ-59. Please see the response to FAQ-HAZ-59.
I-175.52	This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

II.6 - RESPONSES TO INDIVIDUAL COMMENTS

Eden Vitakis

From: phuddle104 < phuddle104@charter.net >

Sent: Monday, July 22, 2024 4:31 PM
To: Jeffrey Smith; CBFCentury@aol.com

Subject: Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH

2021040012)

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. These planes fly directly over my house and were very noisy, often waking my family up at night.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furtherm

Sincerely,

Patty Huddleston 639 Burwood Ct. Riverside, CA 92506 I-176.1

Response to Comment Letter I-176

Patty Huddleston July 22, 2024

I-176.1 This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Peggy Adaskaveg <padaskaveg@gmail.com>

Mon 7/22/2024 7:19 PM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-177.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the proposed project impact local wildlife habitats and biodiversity?	I I-177.2
Has the report thoroughly assessed the potential noise pollution from the project on nearby residential areas?	-177.3
What measures are in place to mitigate the impact of increased traffic congestion in the surrounding area?	I -177.4
Are there any plans to address the potential increase in air pollution resulting from the project?	I I-177.5
How will the project affect the quality of water sources in the vicinity?	I I-177.6

Has the report considered the long-term effects of the project on the local climate and microclimate?	T 1-177.7
What steps will be taken to minimize light pollution from the project's operations?	I I-177.8
How will the project impact the visual aesthetics of the surrounding area?	I I-177.9
Are there any plans to address the potential disruption of local ecosystems caused by the project?	I I-177.10
Has the report thoroughly assessed the risk of soil contamination from construction activities?	I I-177.11
What measures are in place to prevent soil erosion during and after construction?	I I-177.12
How will the project impact the availability of green spaces and recreational areas in the community?	_ I I-177.13
Are there any plans to mitigate the potential loss of agricultural land due to the project?	I I-177.14
Has the report considered the impact of the project on groundwater resources in the area?	I I-177.15
What measures are in place to ensure the safety of nearby residents in case of emergencies related to the project?	1-177.16
How will the project affect the overall air quality in the region?	I I-177.17
Are there any plans to address the potential increase in greenhouse gas emissions resulting from the project?	I-177.18
Has the report thoroughly assessed the risk of wildfires in the area due to the project?	I I-177.19
What measures are in place to protect local water bodies from pollution during and after construction?	I I-177.20
How will the project impact the local flora and fauna species, especially those that are endangered or protected?	I-177.21
Are there any plans to address the potential displacement of wildlife habitats caused by the project?	I I-177.22
Has the report considered the impact of the project on nearby wetlands and waterways?	I I-177.23
What measures are in place to ensure the safe disposal of hazardous materials used during construction and operation?	I-177.24
How will the project impact the overall health and well-being of the local community?	I I-177.25
Are there any plans to address the potential increase in waste generation resulting from the project?	I I-177.26
Has the report thoroughly assessed the risk of landslides in the area due to the project?] I-177.27
What measures are in place to protect the local population from exposure to harmful chemicals or pollutants?	I-177.28

Page 2 of 4 in Comment Letter I-177

How will the project impact the availability of affordable housing in the region?] 1-177.29
Are there any plans to address the potential gentrification of the area due to the project?] 1-177.30
Has the report considered the impact of the project on the cultural heritage and historical sites in the vicinity?	-177.31
What measures are in place to ensure the project complies with all relevant environmental regulations and standards?	1-177.32
How will the project impact the local economy, including job creation and income generation?	I I-177.33
Are there any plans to address the potential increase in light and noise pollution from the project's operations?	-177.34
Has the report thoroughly assessed the risk of flooding in the area due to the project?	I I-177.35
What measures are in place to protect the local population from the spread of diseases or health hazards associated with the project?] -177.36
How will the project impact the availability of public transportation and infrastructure in the region?	I I-177.37
Are there any plans to address the potential strain on public services and utilities caused by the project?	I I-177.38
Has the report considered the impact of the project on property values and real estate in the surrounding area?	I-177.39
What measures are in place to ensure the project's long-term sustainability and environmental stewardship?	I-177.40
How will the project impact the overall livability and quality of life for residents in the community?] 1-177.41
Are there any plans to address the potential social inequalities or disparities that may arise from the project?	I-177.42
Has the report thoroughly assessed the risk of soil contamination from hazardous waste disposal related to the project?	I-177.43
What measures are in place to protect vulnerable populations, such as children and the elderly, from the project's negative impacts?	I-177.44
How will the project impact the local infrastructure, including roads, bridges, and utilities?] 1-177.45
Are there any plans to address the potential increase in traffic accidents and road safety issues resulting from the project?	-177.46
Has the report considered the impact of the project on nearby schools, hospitals, and other essential services?	I-177.47

Page 3 of 4 in Comment Letter I-177

What measures are in place to ensure the project's compliance with all relevant zoning and land use regulations?	I-177.48
How will the project impact the overall social cohesion and community well-being in the area?] 1-177.49
Are there any plans to address the potential loss of community cohesion and sense of belonging due to the project?	I-177.50
Has the report thoroughly assessed the risk of air and water pollution from the project's operations?] -177.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-177.52

Sincerely,

Dr. Peggy Mauk Adaskaveg 951-236-2059 5970 Claridge Dr. Riverside 92506 Padaskaveg@gmail.com

Sent from my iPhone

Page 4 of 4 in Comment Letter I-177

Response to Comment Letter I-177

Peggy Adaskaveg July 22, 2024

I-177.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-177.2	This comment is FAQ-BIO-19. Please see the response to FAQ-BIO-19.
I-177.3	This comment is FAQ-NOI-6. Please see the response to FAQ-NOI-6.
I-177.4	This comment is FAQ-TRA-17. Please see the response to FAQ-TRA-17.
I-177.5	This comment is FAQ-AQ-1. Please see the response to FAQ-AQ-1.
I-177.6	This comment is FAQ-HYD-13. Please see the response to FAQ-HYD-13.
I-177.7	This comment is recorded as FAQ-AQ-6 and FAQ-GHG-9. Please see the responses to FAQ-AQ-6 and FAQ-GHG-9.
I-177.8	This comment is FAQ-AES-13. Please see the response to FAQ-AES-13.
I-177.9	This comment is FAQ-AES-10. Please see the response to FAQ-AES-10.
I-177.10	This comment is FAQ-BIO-4. Please see the response to FAQ-BIO-4.
I-177.11	This comment is recorded as FAQ-GEO-4 and FAQ-HAZ-20. Please see the responses to FAQ-GEO-4 and FAQ-HAZ-20.
I-177.12	This comment is FAQ-GEO-8. Please see the response to FAQ-GEO-8.
I-177.13	This comment is FAQ-REC-4. Please see the response to FAQ-REC-4.
I-177.14	This comment is FAQ-AG-1. Please see the response to FAQ-AG-1.
I-177.15	This comment is FAQ-HYD-6. Please see the response to FAQ-HYD-6.
I-177.16	This comment is FAQ-HAZ-41. Please see the response to FAQ-HAZ-41.
I-177.17	This comment is FAQ-AQ-9. Please see the response to FAQ-AQ-9.
I-177.18	This comment is FAQ-GHG-2. Please see the response to FAQ-GHG-2.
I-177.19	This comment is FAQ-FIRE-1. Please see the response to FAQ-FIRE-1.
I-177.20	This comment is FAQ-HYD-19. Please see the response to FAQ-HYD-19.
I-177.21	This comment is FAQ-BIO-16. Please see the response to FAQ-BIO-16.

- **I-177.22** This comment is FAQ-BIO-2. Please see the response to FAQ-BIO-2.
- **I-177.23** This comment is recorded as FAQ-BIO-12 and FAQ-HYD-9. Please see the responses to FAQ-BIO-12 and FAQ-HYD-9.
- I-177.24 This comment is FAQ-HAZ-40. Please see the response to FAQ-HAZ-40.
- I-177.25 This comment is FAQ-EJ-5. Please see the response to FAQ-EJ-5.
- **I-177.26** This comment is FAQ-UTL-2. Please see the response to FAQ-UTL-2.
- I-177.27 This comment is FAQ-GEO-2. Please see the response to FAQ-GEO-2.
- I-177.28 This comment is FAQ-HAZ-47. Please see the response to FAQ-HAZ-47.
- **I-177.29** This comment is FAQ-POP-8. Please see the response to FAQ-POP-8.
- I-177.30 This comment is FAQ-EJ-8. Please see the response to FAQ-EJ-8.
- **I-177.31** This comment is FAQ-CUL-2. Please see the response to FAQ-CUL-2.
- I-177.32 This comment is FAO-PROCESS-10. Please see the response to FAO-PROCESS-10.
- I-177.33 This comment is FAO-POP-11. Please see the response to FAO-POP-11.
- I-177.34 This comment is recorded as FAQ-AES-14 and FAQ-NOI-15. Please see the responses to FAQ-AES-14 and FAQ-NOI-15.
- I-177.35 This comment is FAO-HYD-11. Please see the response to FAO-HYD-11.
- I-177.36 This comment is FAQ-MISC-12. Please see the response to FAQ-MISC-12.
- I-177.37 This comment is FAQ-TRA-11. Please see the response to FAQ-TRA-11.
- **I-177.38** This comment is recorded as FAQ-PUB-6 and FAQ-UTL-8. Please see the responses to FAQ-PUB-6 and FAQ-UTL-8.
- I-177.39 This comment is FAQ-MISC-7. Please see the response to FAQ-MISC-7.
- **I-177.40** This comment is recorded as FAQ-ENG-9 and FAQ-MISC-11. Please see the responses to FAQ-ENG-9 and FAQ-MISC-11.
- **I-177.41** This comment is FAQ-EJ-6. Please see the response to FAQ-EJ-6.
- I-177.42 This comment is FAO-EJ-2. Please see the response to FAO-EJ-2.
- **I-177.43** This comment is FAQ-HAZ-21. Please see the response to FAQ-HAZ-21.

- I-177.44 This comment is recorded as FAQ-AQ-21 and FAQ-NOI-17. Please see the responses to FAQ-AQ-21 and FAQ-NOI-17.
- **I-177.45** This comment is recorded as FAQ-TRA-18 and FAQ-UTL-7. Please see the responses to FAQ-TRA-18 and FAQ-UTL-7.
- I-177.46 This comment is FAQ-TRA-1. Please see the response to FAQ-TRA-1.
- I-177.47 This comment is FAQ-PUB-7. Please see the response to FAQ-PUB-7.
- I-177.48 This comment is FAQ-LU-5. Please see the response to FAQ-LU-5.
- I-177.49 This comment is FAQ-EJ-9. Please see the response to FAQ-EJ-9.
- **I-177.50** This comment is FAQ-MISC-1. Please see the response to FAQ-MISC-1.
- **I-177.51** This comment is recorded as FAQ-AQ-18 and FAQ-HYD-26. Please see the responses to FAQ-AQ-18 and FAQ-HYD-26.
- **I-177.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Peggy Adaskaveg <padaskaveg@gmail.com>

Mon 7/22/2024 7:14 PM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

I-178.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	I 1-178.2
Are there any endangered species in the project area that could be affected?	I I-178.3
What measures are in place to protect water quality in the surrounding areas?	I I-178.4
Has the potential impact on groundwater been thoroughly assessed?	I I-178.5
Are there any plans to mitigate the project's impact on air quality?	I I-178.6
How will the project affect the overall noise levels in the area?	I I-178.7

What measures are in place to ensure the safety of pedestrians and cyclists in the area? I 1-178.12 Has the project considered the potential increase in accidents due to increased traffic? I 1-178.13 Are there any plans to improve public transportation access to the project site? I 1-178.14 How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? I 1-178.16 Has the project considered the cumulative impact of other nearby developments? I 1-178.17 Are there any plans to address potential environmental justice concerns in the project area? I 1-178.18 How will the project affect the visual aesthetics of the surrounding area? I 1-178.19 Are there any plans to preserve or enhance the natural beauty of the project site? I 1-178.20 Has the project considered the impact on property values in the surrounding area? I 1-178.21 What measures are in place to address potential soil contamination from the project? I 1-178.22 How will the project impact the local economy and job market? I 1-178.23 Are there any plans to mitigate the project's impact on local businesses? I 1-178.24 Has the project considered the potential displacement of residents or businesses? I 1-178.25 What measures are in place to address potential cultural heritage sites in the project area? How will the project impact the overall community cohesion and social dynamics? I 1-178.26 Are there any plans to address potential gentrification issues in the project area? I 1-178.28 What measures are in place to address potential strain on local infrastructure? I 1-178.30 How will the project impact the availability of affordable housing in the area?	What steps will be taken to minimize light pollution from the project?	I I-178.8
How will the project impact local traffic patterns and congestion? I I-178.12 What measures are in place to ensure the safety of pedestrians and cyclists in the area? I I-178.13 Are there any plans to improve public transportation access to the project site? I I-178.14 How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? I I-178.16 What measures are in place to address potential health risks associated with the project? I I-178.16 Has the project considered the cumulative impact of other nearby developments? I I-178.17 Are there any plans to address potential environmental justice concerns in the project area? I I-178.19 Are there any plans to preserve or enhance the natural beauty of the project site? II-178.20 Has the project considered the impact on property values in the surrounding area? II-178.21 What measures are in place to address potential soil contamination from the project? II-178.22 How will the project impact the local economy and job market? II-178.23 Are there any plans to mitigate the project's impact on local businesses? II-178.26 How will the project considered the potential displacement of residents or businesses? II-178.26 How will the project impact the overall community cohesion and social dynamics? II-178.27 Are there any plans to address potential cultural heritage sites in the project area? II-178.28 Has the project considered the potential increase in demand for public services? II-178.29 What measures are in place to address potential strain on local infrastructure? II-178.29 What measures are in place to address potential strain on local infrastructure? II-178.30 How will the project impact the availability of affordable housing in the area?	Has the project considered the long-term effects on climate change?	I I-178.9
What measures are in place to ensure the safety of pedestrians and cyclists in the area? I 1-178.12 Has the project considered the potential increase in accidents due to increased traffic? I 1-178.13 Are there any plans to improve public transportation access to the project site? I 1-178.14 How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? I 1-178.16 Has the project considered the cumulative impact of other nearby developments? I 1-178.17 Are there any plans to address potential environmental justice concerns in the project area? I 1-178.18 How will the project affect the visual aesthetics of the surrounding area? I 1-178.19 Are there any plans to preserve or enhance the natural beauty of the project site? I 1-178.20 Has the project considered the impact on property values in the surrounding area? I 1-178.21 What measures are in place to address potential soil contamination from the project? I 1-178.22 How will the project impact the local economy and job market? I 1-178.23 Are there any plans to mitigate the project's impact on local businesses? I 1-178.24 Has the project considered the potential displacement of residents or businesses? I 1-178.25 What measures are in place to address potential cultural heritage sites in the project area? How will the project impact the overall community cohesion and social dynamics? I 1-178.26 Are there any plans to address potential gentrification issues in the project area? I 1-178.28 What measures are in place to address potential strain on local infrastructure? I 1-178.30 How will the project impact the availability of affordable housing in the area?	Are there any plans for sustainable energy use in the project?	I I-178.10
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	What measures are in place to address potential strain on local infrastructure?	I I-178.30
Are there any plans to address potential noise pollution from increased aviation activities? $I_{-178.32}$	How will the project impact the availability of affordable housing in the area?	I I-178.31
	Are there any plans to address potential noise pollution from increased aviation activities?	I I-178.32

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How will the project impact the local schools and educational facilities?	I I-178.33
Has the project considered the potential impact on healthcare services in the area?	I I-178.34
What measures are in place to address potential emergency response challenges?	I I-178.35
Are there any plans to mitigate the project's impact on nearby recreational areas?] I-178.36
How will the project impact the overall sense of community in the area?	I I-178.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-178.38
What measures are in place to address potential safety hazards from increased air traffic?	I I-178.39
How will the project impact the local flora and fauna in the area?	I I-178.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I I-178.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I-178.42
What measures are in place to address potential water pollution from airport operations?	I I-178.43
How will the project impact the overall biodiversity of the area?	I I-178.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-178.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?] I-178.46
What measures are in place to promote sustainable aviation practices?	I I-178.47
How will the project impact the overall carbon footprint of the region?	I I-178.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?] I-178.49
Has the project considered the potential impact of increased aviation activities on local weather patterns?	I-178.50
What measures are in place to address potential climate change effects from airport operations?	I I-178.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I -178.52

Sincerely,

[Your Full Name] [Your Contact Information] [Your Address] [Your Email Address]

Sent from my iPhone

Page 3 of 3 in Comment Letter I-178

Response to Comment Letter I-178

Peggy Adaskaveg July 22, 2024

I-178.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-178.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-178.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-178.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-178.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-178.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-178.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-178.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-178.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-178.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-178.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-178.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-178.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-178.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-178.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-178.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-178.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-178.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-178.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-178.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-178.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-178.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-178.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-178.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-178.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-178.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-178.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-178.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-178.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-178.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-178.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-178.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-178.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-178.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-178.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-178.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-178.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-178.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-178.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-178.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-178.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-178.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-178.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-178.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-178.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-178.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- **I-178.47** This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
- **I-178.48** This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
- **I-178.49** This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- **I-178.50** This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- **I-178.51** This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- **I-178.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Eden Vitakis

From: Sent: To: L S <nichole19161@gmail.com> Monday, July 22, 2024 4:40 PM

Jeffrey Smith; +CBFCentury@aol.com

Subject:

Questions/Comments: Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I believe this DEIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-179.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?

Are there any plans to monitor and report on air quality data in real-time?

I I-179.3

Has the project considered the potential health risks associated with poor air quality?

What measures are in place to address potential respiratory issues from increased air pollution?

I I-179.5

How will the project impact the overall noise levels in the region?

I I-179.6

Are there any plans to implement noise mitigation strategies for affected communities?

1

Has the project considered the potential disruption to local wildlife from increased noise pollution?	I I-179.8
What measures are in place to address potential sleep disturbances from airport operations? Where can community members file a complaint over noise nuisances? How does that get investigated?	I-179.9
How will the project impact the overall light pollution in the region?	I I-179.10
Are there any plans to implement dark sky initiatives to reduce light pollution?] -179.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?	I I-179.12
What measures are in place to address potential light trespass issues for nearby residents?	I I-179.13
How will the project impact the overall water quality in the region?] -179.14
Are there any plans to prevent water contamination from airport operations?] -179.15
Has the project considered the potential runoff and drainage issues from the project site?] -179.16
What measures are in place to address potential water scarcity concerns in the area?] -179.17
How will the project impact the overall soil quality in the region?] -179.18
Are there any plans to prevent soil erosion and degradation from construction activities?	I I-179.19
Has the project considered the potential contamination of soil from hazardous materials?] I-179.20
What measures are in place to address potential soil remediation needs in the area?] -179.21
How will the project impact the overall traffic congestion in the region?	I I-179.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?] -179.23
Has the project considered the potential increase in accidents from congested roadways?] -179.24
What measures are in place to address potential traffic management challenges?] I-179.25
How will the project impact the overall public transportation system in the region?	I I-179.26
Are there any plans to enhance public transit options to reduce reliance on cars? Is there a bus stop by the project?	I-179.27
Has the project considered the strain on public transportation services?	I I-179.28
What measures are in place to address potential accessibility issues for public transit users?	I I-179.29
How will the project impact the overall community health and safety in the region?	I I-179.30

2

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Are there any plans to promote healthy living initiatives for residents in the area?] -179.31
Has the project considered the potential health risks associated with increased pollution?	I I-179.32
What measures are in place to address potential emergency response needs for the community?	I I-179.33
How will the project impact the overall community resilience to environmental hazards?	I I-179.34
Are there any plans to implement disaster preparedness programs for the community? With the amount of daily flights increasing substantially, hence chances of a disaster increase, this is critical.	I-179.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-179.36
What measures are in place to address potential public health crises in the region?	I I-179.37
How will the project comply with local, state, and federal environmental regulations?	I I-179.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I I-179.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-179.40
What measures are in place to address potential regulatory violations during the project?	I I-179.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-179.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I I-179.43
Has the project considered the potential need for adaptive management strategies?	I I-179.44
What measures are in place to promote environmental education and awareness in the community?	I I-179.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-179.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	I I-179.47
Has the project considered the potential need for independent environmental audits and reviews?	I I-179.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I I-179.49
How will the project address any unforeseen environmental challenges or emergencies? Are there enough emergency services locally that can handle emergencies such as aircraft crashes?	I I-179.50
Are there any plans to establish a contingency fund for environmental mitigation efforts?	1-179.51
Thank you for your attention to these critical issues. I look forward to your response and further community engagement on how we can effectively address these concerns.	I-179.52
Sincerely,	

3

Page 3 of 4 in Comment Letter I-179

Laura Sandidge 19161 Vintage Woods Drive Riverside Ca 92508 Mission Grove nichole19161@gmail.com

4

Page 4 of 4 in Comment Letter I-179

Response to Comment Letter I-179

Laura Sandidge July 22, 2024

I-179.1	This comment is the FAQ Introduction. As such, please see FAQ Introduction Response.
I-179.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-179.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-179.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-179.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-179.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-179.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-179.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-179.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-179.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-179.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-179.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-179.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-179.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-179.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-179.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-179.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-179.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-179.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-179.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-179.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-179.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

- **I-179.23** This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4.
- I-179.24 This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6.
- **I-179.25** This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15.
- I-179.26 This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12.
- I-179.27 This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2. Regarding a bus stop nearby the project site, the March JPA Planning Area is currently served by the Riverside Transit Authority, a public transit agency serving the unincorporated Riverside County region. There are currently no existing bus routes that serve the roadways within the study area close to the project site. Existing bus transit routes in the vicinity of the study area are illustrated in Figure 3.12-4.
- **I-179.28** This comment is FAQ-TRA-7. Please see the response to FAQ-TRA-7.
- **I-179.29** This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14.
- **I-179.30** This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9.
- **I-179.31** This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3.
- **I-179.32** This comment is recorded as FAQ-AQ-4 and FAQ-HAZ-73. Please see the responses to FAQ-AQ-4 and FAQ-HAZ-73.
- **I-179.33** This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4.
- I-179.34 This comment is FAQ-HAZ-35. Please see the response to FAQ-HAZ-35.
- I-179.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10.
- **I-179.36** This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6.
- I-179.37 This comment is FAQ-MISC-10. Please see the response to FAQ-MISC-10.
- I-179.38 This comment is FAO-PROCESS-7. Please see the response to FAO-PROCESS-7.
- I-179.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1.
- I-179.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4.
- I-179.41 This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9.
- **I-179.42** This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11.
- I-179.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3.

- I-179.44 This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5.
 I-179.45 This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.
- **I-179.46** This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8.
- I-179.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2.
- I-179.48 This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6.
- **I-179.49** This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12.
- **I-179.50** This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5.
- **I-179.51** This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2.
- **I-179.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

nd.cole <nd.cole@sbcglobal.net>

Mon 7/22/2024 7:27 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the local wildlife and ecosystems?	I I-180.2
Are there any endangered species in the project area that could be affected?	I I-180.3
What measures are in place to protect water quality in the surrounding areas?	I I-180.4
Has the potential impact on groundwater been thoroughly assessed?	I I-180.5
Are there any plans to mitigate the project's impact on air quality?	I I-180.6
How will the project affect the overall noise levels in the area?	I 1-180.7
What steps will be taken to minimize light pollution from the project?	I I-180.8
Has the project considered the long-term effects on climate change?	I I-180.9
Are there any plans for sustainable energy use in the project?	I -180.10
How will the project impact local traffic patterns and congestion?	I -180.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I I-180.12
Has the project considered the potential increase in accidents due to increased traffic?	I I-180.13
Are there any plans to improve public transportation access to the project site?	I -180.14
How will the project impact the quality of life for nearby residents?	I -180.15
What measures are in place to address potential health risks associated with the project?	I I-180.16

1-180.1

Has the project considered the cumulative impact of other nearby developments?	I I-180.17
Are there any plans to address potential environmental justice concerns in the project area?	I -180.18
How will the project affect the visual aesthetics of the surrounding area?	I I-180.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-180.20
Has the project considered the impact on property values in the surrounding area?	I I-180.21
What measures are in place to address potential soil contamination from the project?	I I-180.22
How will the project impact the local economy and job market?	I I-180.23
Are there any plans to mitigate the project's impact on local businesses?	I I-180.24
Has the project considered the potential displacement of residents or businesses?	I I-180.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-180.26
How will the project impact the overall community cohesion and social dynamics?	I I-180.27
Are there any plans to address potential gentrification issues in the project area?	I I-180.28
Has the project considered the potential increase in demand for public services?	I I-180.29
What measures are in place to address potential strain on local infrastructure?	I I-180.30
How will the project impact the availability of affordable housing in the area?	I I-180.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-180.32
How will the project impact the local schools and educational facilities?	I I-180.33
Has the project considered the potential impact on healthcare services in the area?	I I-180.34
What measures are in place to address potential emergency response challenges?	I I-180.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	I I-180.36
How will the project impact the overall sense of community in the area?	I I-180.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-180.38
What measures are in place to address potential safety hazards from increased air traffic?	I I-180.39
How will the project impact the local flora and fauna in the area?	I 1-180.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I I-180.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I I-180.42
What measures are in place to address potential water pollution from airport operations?	I I-180.43
How will the project impact the overall biodiversity of the area?	I I-180.44
Are there any plans to preserve or enhance natural habitats in the project area?	I I-180.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	I I-180.46
What measures are in place to promote sustainable aviation practices?	I I-180.47
How will the project impact the overall carbon footprint of the region?	I I-180.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	I I-180.49

Page 2 of 3 in Comment Letter I-180

Has the project considered the potential impact of increased aviation activities on local weather patterns?

I I-180.50

What measures are in place to address potential climate change effects from airport operations?

I I-180.51

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

T I-180.52

Sincerely,

Norman Cole 951.204.7715 166 Acacia Glen Dr. Riverside, CA 92506 nd.cole@sbcglobal.net

Sent from my T-Mobile 5G Device

Page 3 of 3 in Comment Letter I-180

Response to Comment Letter I-180

Norman Cole July 22, 2024

I-180.1	This comment is the FAQ Introduction. As such, please see FAQ Introduction Response.
I-180.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-180.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-180.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-180.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-180.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-180.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-180.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-180.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-180.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-180.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-180.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-180.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-180.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-180.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-180.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-180.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-180.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-180.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-180.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-180.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-180.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-180.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-180.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-180.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-180.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-180.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-180.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
l-180.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-180.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-180.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-180.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-180.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-180.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-180.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-180.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-180.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-180.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-180.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-180.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-180.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-180.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-180.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-180.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-180.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-180.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-180.47	This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
I-180.48	This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
I-180.49	This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-180.50	This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-180.51	This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
I-180.52	This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-181

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Prasanna Weerakoon < weerakoon.prasanna@gmail.com >

Mon 7/22/2024 1:21 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-181.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?	I I-181.2
Are there any plans to monitor and report on air quality data in real-time?	I I-181.3
Has the project considered the potential health risks associated with poor air quality?	I I-181.4
What measures are in place to address potential respiratory issues from increased air pollution?	I I-181.5
How will the project impact the overall noise levels in the region?	I I-181.6
Are there any plans to implement noise mitigation strategies for affected communities?	I I-181.7

Has the project considered the potential disruption to local wildlife from increased noise pollution?	I I-181.8
What measures are in place to address potential sleep disturbances from airport operations?	I I-181.9
How will the project impact the overall light pollution in the region?	I I-181.10
Are there any plans to implement dark sky initiatives to reduce light pollution?	I I-181.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?	I I-181.12
What measures are in place to address potential light trespass issues for nearby residents?	I I-181.13
How will the project impact the overall water quality in the region?	I I-181.14
Are there any plans to prevent water contamination from airport operations?	I I-181.15
Has the project considered the potential runoff and drainage issues from the project site?	I I-181.16
What measures are in place to address potential water scarcity concerns in the area?	I I-181.17
How will the project impact the overall soil quality in the region?	I I-181.18
Are there any plans to prevent soil erosion and degradation from construction activities?	I I-181.19
Has the project considered the potential contamination of soil from hazardous materials?	I I-181.20
What measures are in place to address potential soil remediation needs in the area?	I I-181.21
How will the project impact the overall traffic congestion in the region?	I I-181.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?	I I-181.23
Has the project considered the potential increase in accidents from congested roadways?	I I-181.24
What measures are in place to address potential traffic management challenges?	I I-181.25
How will the project impact the overall public transportation system in the region?	I I-181.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-181.27
Has the project considered the potential strain on public transportation services?	I I-181.28
What measures are in place to address potential accessibility issues for public transit users?	I I-181.29
How will the project impact the overall community health and safety in the region?	I I-181.30
Are there any plans to promote healthy living initiatives for residents in the area?] I-181.31
Has the project considered the potential health risks associated with increased pollution?	I I-181.32

Page 2 of 3 in Comment Letter I-181

What measures are in place to address potential emergency response needs for the community?	I I-181.33
How will the project impact the overall community resilience to environmental hazards?	I I-181.34
Are there any plans to implement disaster preparedness programs for the community?	I I-181.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-181.36
What measures are in place to address potential public health crises in the region?	I I-181.37
How will the project comply with local, state, and federal environmental regulations?	I I-181.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I I-181.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-181.40
What measures are in place to address potential regulatory violations during the project?	I I-181.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-181.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I I-181.43
Has the project considered the potential need for adaptive management strategies?	I I-181.44
What measures are in place to promote environmental education and awareness in the community?	I I-181.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-181.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	I I-181.47
Has the project considered the potential need for independent environmental audits and reviews?	I I-181.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I I-181.49
How will the project address any unforeseen environmental challenges or emergencies?	I I-181.50
Are there any plans to establish a contingency fund for environmental mitigation efforts?	I I-181.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-181.52

Sincerely,

Prasanna Weerakoon 9092159807 19230 White Dove Ln, Riverside CA 92508 weerakoon.prasanna@gmail.com

Page 3 of 3 in Comment Letter I-181

Response to Comment Letter I-181

Prasanna Weerakoon July 22, 2024

I-181.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-181.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
l-181.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-181.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
l-181.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-181.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-181.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-181.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-181.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-181.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-181.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-181.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-181.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-181.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-181.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-181.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-181.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-181.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-181.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-181.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-181.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-181.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

- **I-181.23** This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4.
- **I-181.24** This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6.
- **I-181.25** This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15.
- I-181.26 This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12.
- **I-181.27** This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2.
- **I-181.28** This comment is FAQ-TRA-7. Please see the response to FAQ-TRA-7.
- **I-181.29** This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14.
- **I-181.30** This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-9.
- **I-181.31** This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3.
- **I-181.32** This comment is recorded as FAQ-AQ-4 and FAQ-HAZ-73. Please see the responses to FAQ-AQ-4 and FAQ-HAZ-73.
- I-181.33 This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4.
- I-181.34 This comment is FAO-HAZ-35. Please see the response to FAO-HAZ-35.
- I-181.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10.
- **I-181.36** This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6.
- I-181.37 This comment is FAO-MISC-10. Please see the response to FAO-MISC-10.
- I-181.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7.
- I-181.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1.
- I-181.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4.
- **I-181.41** This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9.
- **I-181.42** This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11.
- I-181.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3.
- I-181.44 This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5.
- **I-181.45** This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

- I-181.46 This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8.
- I-181.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2.
- **I-181.48** This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6.
- **I-181.49** This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12.
- **I-181.50** This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5.
- **I-181.51** This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2.
- **I-181.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-182

Meridian D1 Gateway Aviation Center Draft EIR(SCH 2021040012)

Ruth Ann Ryan <auntrockar@aol.com>

Mon 7/22/2024 11:21 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

As residents of the Mission Grove neighborhood, we ask you to consider carefully the impact of this proposal and reject it

Thank you.

Sincerely, Ruth Ann Ryan Stephen Parker 92506

Sent from the all new AOL app for iOS

I-182.1

Response to Comment Letter I-182

Ruth Ann Ryan July 22, 2024

I-182.1 This comment is Form Letter A, with the addition of "As residents of Mission Grove, we ask you to consider carefully the impact of this proposed project and reject it." This added text does not raise any new or different environmental issues than what is already included in the form. As such, please see Form Letter A Response.

Comment Letter I-183

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Rose Gerhartz < gerhartz 2000@aol.com>

Mon 7/22/2024 7:10 AM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR: How will the project impact the local wildlife and ecosystems? Are there any endangered species in the project area that could be affected? What measures are in place to protect water quality in the surrounding areas? Has the potential impact on groundwater been thoroughly assessed? Are there any plans to mitigate the project's impact on air quality? How will the project affect the overall noise levels in the area? What steps will be taken to minimize light pollution from the project? Has the project considered the longterm effects on climate change? Are there any plans for sustainable energy use in the project? How will the project impact local traffic patterns and congestion? What measures are in place to ensure the safety of pedestrians and cyclists in the area? Has the project considered the potential increase in accidents due to increased traffic? Are there any plans to improve public transportation access to the project site? How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? Has the project considered the cumulative impact of other nearby developments? Are there any plans to address potential environmental justice concerns in the project area? How will the project affect the visual aesthetics of the surrounding area? Are there any plans to preserve or enhance the natural beauty of the project site? Has the project considered the impact on property values in the surrounding area? What measures are in place to address potential soil contamination from the project? How will the project impact the local economy and job market? Are there any plans to mitigate the project's impact on local businesses? Has the project considered the potential displacement of residents or businesses? What measures are in place to address potential cultural heritage sites in the project area? How will the project impact the overall community cohesion and social dynamics? Are there any plans to address potential gentrification issues in the project area? Has the project considered the potential increase in demand for public services? What measures are in place to address potential strain on local infrastructure? How will the project impact the availability of affordable housing in the area? Are there any plans to address potential noise pollution from increased aviation activities? How will the project impact the local schools and educational facilities? Has the project

I-183.1

I-183.2 I-183.3-4 1-183.5 1-183.6 I-183.7-8 1-183.9 I-183.10-11 I-183.12 I-183.13 I-183.14 I-183.15 I-183.16 I-183 17-18 I-183 19 I-183.20 I-183.21 1-183.22 1-183.23 1-183.24-25 I-183.26 I-183.27 I-183.28 1-183.29 I-183.30 I-183.31 I-183.32-33 I-183 34

considered the potential impact on healthcare services in the area? What measures are in place to address potential emergency response challenges? Are there any plans to mitigate the project's impact on nearby recreational areas? How will the project impact the overall sense of community in the area? Has the project considered the potential increase in light pollution from the airport operations? What measures are in place to address potential safety hazards from increased air traffic? How will the project impact the local flora and fauna in the area? Are there any plans to mitigate the project's impact on migratory bird populations? Has the project considered the potential disruption to local ecosystems from increased aviation activities? What measures are in place to address potential water pollution from airport operations? How will the project impact the overall biodiversity of the area? Are there any plans to preserve or enhance natural habitats in the project area? Has the project considered the potential increase in greenhouse gas emissions from airport operations? What measures are in place to promote sustainable aviation practices? How will the project impact the overall carbon footprint of the region? Are there any plans to offset the project's carbon emissions through environmental initiatives? Has the project considered the potential impact of increased aviation activities on local weather patterns? What measures are in place to address potential climate change effects from airport operations? Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns. Sincerely, Rose Gerhartz, 951-218-9980, 625 Atwood Ct Riverside 92506, gerhartz2000@aol.com.

I-183.35 I-183.36 I-183.37 I-183.38 I-183.39 I-183.40-41 I-183.42 1-183.43 1-183.44 I-183.45 I-183.46 I-183.47 I-183.48 I-183.49 I-183.50 I-183.51 I-183.52

Page 2 of 2 in Comment Letter I-183

Response to Comment Letter I-183

Rose Gerhartz July 22, 2024

I-183.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-183.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-183.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-183.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-183.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-183.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-183.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-183.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-183.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-183.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-183.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-183.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-183.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-183.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-183.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-183.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-183.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-183.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-183.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-183.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-183.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-183.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-183.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-183.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-183.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-183.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-183.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-183.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-183.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-183.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-183.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-183.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-183.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-183.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-183.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-183.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-183.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-183.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-183.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-183.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-183.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-183.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-183.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-183.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-183.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-183.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-183.47 This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
I-183.48 This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
I-183.49 This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-183.50 This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-183.51 This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
I-183.52 This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-184

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Robert Rietveld <robert.rietveld@yahoo.com>

Mon 7/22/2024 8:48 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

1-184.1

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?	I I-184.2
Are there any plans to monitor and report on air quality data in real-time?] -184.3
Has the project considered the potential health risks associated with poor air quality?] -184.4
What measures are in place to address potential respiratory issues from increased air pollution?	I I-184.5
How will the project impact the overall noise levels in the region?	I I-184.6
Are there any plans to implement noise mitigation strategies for affected communities?	I I-184.7

Has the project considered the potential disruption to local wildlife from increased noise pollution?	I I-184.8
What measures are in place to address potential sleep disturbances from airport operations?	I I-184.9
How will the project impact the overall light pollution in the region?	I I-184.10
Are there any plans to implement dark sky initiatives to reduce light pollution?	I I-184.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?	I I-184.12
What measures are in place to address potential light trespass issues for nearby residents?	I I-184.13
How will the project impact the overall water quality in the region?	I I-184.14
Are there any plans to prevent water contamination from airport operations?	I I-184.15
Has the project considered the potential runoff and drainage issues from the project site?	I I-184.16
What measures are in place to address potential water scarcity concerns in the area?	I I-184.17
How will the project impact the overall soil quality in the region?	I I-184.18
Are there any plans to prevent soil erosion and degradation from construction activities?	I I-184.19
Has the project considered the potential contamination of soil from hazardous materials?	I I-184.20
What measures are in place to address potential soil remediation needs in the area?	I I-184.21
How will the project impact the overall traffic congestion in the region?	I I-184.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?	I I-184.23
Has the project considered the potential increase in accidents from congested roadways?	I I-184.24
What measures are in place to address potential traffic management challenges?	I I-184.25
How will the project impact the overall public transportation system in the region?	I I-184.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-184.27
Has the project considered the potential strain on public transportation services?	I I-184.28
What measures are in place to address potential accessibility issues for public transit users?	I I-184.29
How will the project impact the overall community health and safety in the region?	I I-184.30
Are there any plans to promote healthy living initiatives for residents in the area?	I I-184.31
Has the project considered the potential health risks associated with increased pollution?	I I-184.32

Page 2 of 3 in Comment Letter I-184

What measures are in place to address potential emergency response needs for the community?	I I-184.33
How will the project impact the overall community resilience to environmental hazards?	I I-184.34
Are there any plans to implement disaster preparedness programs for the community?	I I-184.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-184.36
What measures are in place to address potential public health crises in the region?	I I-184.37
How will the project comply with local, state, and federal environmental regulations?	I I-184.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I I-184.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-184.40
What measures are in place to address potential regulatory violations during the project?	I I-184.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-184.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I I-184.43
Has the project considered the potential need for adaptive management strategies?	I I-184.44
What measures are in place to promote environmental education and awareness in the community?] I-184.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-184.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	I I-184.47
Has the project considered the potential need for independent environmental audits and reviews?	I I-184.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I I-184.49
How will the project address any unforeseen environmental challenges or emergencies?	I I-184.50
Are there any plans to establish a contingency fund for environmental mitigation efforts?	I I-184.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-184.52

Sincerely,

Robert Rietveld 6680 Darkwood Dr Riverside Ca, 92506 951-789-2235 robert.rietveld@yahoo.com Sent from my iPhone

Page 3 of 3 in Comment Letter I-184

Response to Comment Letter I-184

Robert Rietveld July 22, 2024

I-184.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-184.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-184.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-184.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-184.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-184.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-184.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-184.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
l-184.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-184.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-184.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
l-184.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-184.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-184.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-184.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-184.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-184.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-184.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
l-184.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-184.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-184.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-184.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

I-184.23 This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4. I-184.24 This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6. I-184.25 This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15. I-184.26 This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12. I-184.27 This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2. I-184.28 This comment is FAO-TRA-7. Please see the response to FAO-TRA-7. I-184.29 This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14. I-184.30 This comment is FAQ-PUB-10. Please see the response to FAQ-PUB-10. I-184.31 This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3. I-184.32 This comment is recorded as FAO-AO-4 and FAO-HAZ-73. Please see the responses to FAO-AO-4 and FAQ-HAZ-73. I-184.33 This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4. I-184.34 This comment is FAQ-HAZ-35. Please see the response to FAQ-HAZ-35. I-184.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10. I-184.36 This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6. I-184.37 This comment is FAO-MISC-10. Please see the response to FAO-MISC-10. I-184.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7. I-184.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1. I-184.40 This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4. I-184.41 This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9. I-184.42 This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11. I-184.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3.

This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74

This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

and FAQ-MISC-5.

I-184.44

I-184.45

- **I-184.46** This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8.
- I-184.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2.
- **I-184.48** This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6.
- **I-184.49** This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12.
- **I-184.50** This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5.
- **I-184.51** This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2.
- **I-184.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-185

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Steven Balmer <sjgbalmer@gmail.com>

Mon 7/22/2024 10:16 AM

To:Jeffrey Smith <smith@marchjpa.com>;+CBFCentury@aol.com <+CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. Please save our area!

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

How will the project impact the overall air quality in the region?	I ∣-185.2
Are there any plans to monitor and report on air quality data in real-time?	I I-185.3
Has the project considered the potential health risks associated with poor air quality?	I I-185.4
What measures are in place to address potential respiratory issues from increased air pollution?	I I-185.5
How will the project impact the overall noise levels in the region?	I I-185.6
Are there any plans to implement noise mitigation strategies for affected communities?	I I-185.7
Has the project considered the potential disruption to local wildlife from increased noise pollution?	I I-185.8
What measures are in place to address potential sleep disturbances from airport operations?	I I-185.9
How will the project impact the overall light pollution in the region?	I I-185.10
Are there any plans to implement dark sky initiatives to reduce light pollution?	I -185.11
Has the project considered the potential impact on nocturnal animals from increased artificial lighting?	I I-185.12
What measures are in place to address potential light trespass issues for nearby residents?	I I-185.13
How will the project impact the overall water quality in the region?	I I-185.14
Are there any plans to prevent water contamination from airport operations?	I I-185.15
Has the project considered the potential runoff and drainage issues from the project site?	I I-185.16

1-185.1

What measures are in place to address potential water scarcity concerns in the area?	I I-185.17
How will the project impact the overall soil quality in the region?	I I-185.18
Are there any plans to prevent soil erosion and degradation from construction activities?	I I-185.19
Has the project considered the potential contamination of soil from hazardous materials?	I I-185.20
What measures are in place to address potential soil remediation needs in the area?	I I-185.21
How will the project impact the overall traffic congestion in the region?	I I-185.22
Are there any plans to improve transportation infrastructure to alleviate traffic issues?	I I-185.23
Has the project considered the potential increase in accidents from congested roadways?	I I-185.24
What measures are in place to address potential traffic management challenges?	I I-185.25
How will the project impact the overall public transportation system in the region?	I I-185.26
Are there any plans to enhance public transit options to reduce reliance on cars?	I I-185.27
Has the project considered the potential strain on public transportation services?	I I-185.28
What measures are in place to address potential accessibility issues for public transit users?	I I-185.29
How will the project impact the overall community health and safety in the region?	I I-185.30
Are there any plans to promote healthy living initiatives for residents in the area?	I I-185.31
Has the project considered the potential health risks associated with increased pollution?	I I-185.32
What measures are in place to address potential emergency response needs for the community?	I I-185.33
How will the project impact the overall community resilience to environmental hazards?	I I-185.34
Are there any plans to implement disaster preparedness programs for the community?	I I-185.35
Has the project considered the community's potential vulnerability to climate change impacts?	I I-185.36
What measures are in place to address potential public health crises in the region?	I I-185.37
How will the project comply with local, state, and federal environmental regulations?	I I-185.38
Are there any plans to ensure regulatory compliance throughout the project lifecycle?	I I-185.39
Has the project obtained all necessary permits and approvals for construction and operation?	I I-185.40
What measures are in place to address potential regulatory violations during the project?	I I-185.41
How will the project ensure long-term sustainability and environmental stewardship?	I I-185.42
Are there any plans to monitor and evaluate the project's environmental performance over time?	I I-185.43
Has the project considered the potential need for adaptive management strategies?	I I-185.44
What measures are in place to promote environmental education and awareness in the community?	I I-185.45
How will the project engage with stakeholders and the public to address environmental concerns?	I I-185.46
Are there any plans to establish a community advisory board for ongoing environmental oversight?	I I-185.47
Has the project considered the potential need for independent environmental audits and reviews?	I -185.48
What measures are in place to ensure transparency and accountability in environmental reporting?	I I-185.49

Page 2 of 3 in Comment Letter I-185

How will the project address any unforeseen environmental challenges or emergencies?

I I-185.50

Are there any plans to establish a contingency fund for environmental mitigation efforts?

I I-185.51

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

|-185.52

Sincerely,

Steve Balmer 818-398-0492 20699 Hillsdale Road, Riverside, CA 92508 sjgbalmer@reuzeit.com

Page 3 of 3 in Comment Letter I-185

Response to Comment Letter I-185

Steven Balmer July 22, 2024

I-185.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-185.2	This comment is FAQ-AQ-11. Please see the response to FAQ-AQ-11.
I-185.3	This comment is FAQ-AQ-3. Please see the response to FAQ-AQ-3.
I-185.4	This comment is FAQ-AQ-5. Please see the response to FAQ-AQ-5.
I-185.5	This comment is FAQ-AQ-14. Please see the response to FAQ-AQ-14.
I-185.6	This comment is FAQ-NOI-10. Please see the response to FAQ-NOI-10.
I-185.7	This comment is FAQ-NOI-3. Please see the response to FAQ-NOI-3.
I-185.8	This comment is FAQ-BIO-10. Please see the response to FAQ-BIO-10.
I-185.9	This comment is FAQ-NOI-11. Please see the response to FAQ-NOI-11.
I-185.10	This comment is FAQ-AES-9. Please see the response to FAQ-AES-9.
I-185.11	This comment is FAQ-AES-3. Please see the response to FAQ-AES-3.
I-185.12	This comment is FAQ-BIO-11. Please see the response to FAQ-BIO-11.
I-185.13	This comment is FAQ-AES-11. Please see the response to FAQ-AES-11.
I-185.14	This comment is FAQ-HYD-16. Please see the response to FAQ-HYD-16.
I-185.15	This comment is FAQ-HYD-3. Please see the response to FAQ-HYD-3.
I-185.16	This comment is FAQ-HYD-5. Please see the response to FAQ-HYD-5.
I-185.17	This comment is FAQ-UTL-5. Please see the response to FAQ-UTL-5.
I-185.18	This comment is FAQ-GEO-7. Please see the response to FAQ-GEO-7.
I-185.19	This comment is FAQ-GEO-1. Please see the response to FAQ-GEO-1.
I-185.20	This comment is FAQ-HAZ-18. Please see the response to FAQ-HAZ-18.
I-185.21	This comment is FAQ-HAZ-38. Please see the response to FAQ-HAZ-38.
I-185.22	This comment is FAQ-TRA-13. Please see the response to FAQ-TRA-13.

I-185.23 This comment is FAQ-TRA-4. Please see the response to FAQ-TRA-4. I-185.24 This comment is FAQ-TRA-6. Please see the response to FAQ-TRA-6. I-185.25 This comment is FAQ-TRA-15. Please see the response to FAQ-TRA-15. I-185.26 This comment is FAQ-TRA-12. Please see the response to FAQ-TRA-12. I-185.27 This comment is FAQ-TRA-2. Please see the response to FAQ-TRA-2. I-185.28 This comment is FAO-TRA-7. Please see the response to FAO-TRA-7. I-185.29 This comment is FAQ-TRA-14. Please see the response to FAQ-TRA-14. I-185.30 This comment is FAQ-PUB-9. Please see the response to FAQ-PUB-10. I-185.31 This comment is FAQ-EJ-3. Please see the response to FAQ-EJ-3. I-185.32 This comment is recorded as FAO-AO-4 and FAO-HAZ-73. Please see the responses to FAO-AO-4 and FAQ-HAZ-73. I-185.33 This comment is FAQ-PUB-4. Please see the response to FAQ-PUB-4. I-185.34 This comment is FAQ-HAZ-35. Please see the response to FAQ-HAZ-35. I-185.35 This comment is FAQ-HAZ-10. Please see the response to FAQ-HAZ-10. I-185.36 This comment is FAQ-GHG-6. Please see the response to FAQ-GHG-6. I-185.37 This comment is FAO-MISC-10. Please see the response to FAO-MISC-10. I-185.38 This comment is FAQ-PROCESS-7. Please see the response to FAQ-PROCESS-7. I-185.39 This comment is FAQ-PROCESS-1. Please see the response to FAQ-PROCESS-1. I-185.40This comment is FAQ-PROCESS-4. Please see the response to FAQ-PROCESS-4. I-185.41 This comment is FAQ-PROCESS-9. Please see the response to FAQ-PROCESS-9. I-185.42 This comment is recorded as FAQ-ENG-6 and FAQ-GHG-11. Please see the responses to FAQ-ENG-6 and FAQ-GHG-11.2 I-185.43 This comment is FAQ-PROCESS-3. Please see the response to FAQ-PROCESS-3. I-185.44 This comment is recorded as FAQ-HAZ-74 and FAQ-MISC-5. Please see the responses to FAQ-HAZ-74 and FAQ-MISC-5. I-185.45 This comment is FAQ-PROCESS-13. Please see the response to FAQ-PROCESS-13.

This comment is FAQ-PROCESS-8. Please see the response to FAQ-PROCESS-8. I-185.46 I-185.47 This comment is FAQ-PROCESS-2. Please see the response to FAQ-PROCESS-2. I-185.48 This comment is FAQ-MISC-6. Please see the response to FAQ-MISC-6. I-185.49 This comment is FAQ-PROCESS-12. Please see the response to FAQ-PROCESS-12. I-185.50 This comment is recorded as FAQ-FIRE-2 and FAQ-PUB-5. Please see the responses to FAQ-FIRE-2 and FAQ-PUB-5. I-185.51 This comment is FAQ-MISC-2. Please see the response to FAQ-MISC-2. I-185.52 This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

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Comment Letter I-186

Eden Vitakis

From: Roylene Scott <roylenescott@gmail.com>

Sent:Monday, July 22, 2024 4:01 PMTo:+CBFCentury@aol.com; Jeffrey Smith

Subject: Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH

2021040012)

Dear Mr. Smith, Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community. The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project. The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area. More specifically, I would like to comment and question the following related to the EIR: How will the project impact the local wildlife and ecosystems? Are there any endangered species in the project area that could be affected? What measures are in place to protect water quality in the surrounding areas? Has the potential impact on groundwater been thoroughly assessed? Are there any plans to mitigate the project's impact on air quality? How will the project affect the overall noise levels in the area? What steps will be taken to minimize light pollution from the project? Has the project considered the long-term effects on climate change? Are there any plans for sustainable energy use in the project? How will the project impact local traffic patterns and congestion? What measures are in place to ensure the safety of pedestrians and cyclists in the area? Has the project considered the potential increase in accidents due to increased traffic? Are there any plans to improve public transportation access to the project site? How will the project impact the quality of life for nearby residents? What measures are in place to address potential health risks associated with the project? Has the project considered the cumulative impact of other nearby developments? Are there any plans to address potential environmental justice concerns in the project area? How will the project affect the visual aesthetics of the surrounding area? Are there any plans to preserve or enhance the natural beauty of the project site? Has the project considered the impact on property values in the surrounding area? What measures are in place to address potential soil contamination from the project? How will the project impact the local economy and job market? Are there any plans to mitigate the project's impact on local businesses? Has the project considered the potential displacement of residents or businesses? What measures are in place to address potential cultural heritage sites in the project area? How will the project impact the overall community cohesion and social dynamics? Are there any plans to address potential gentrification issues in the project area? Has the project considered the potential increase in demand for public services? What measures are in

I-186.1

I-186.2 I-186.3-4 I-186.5 I-186.6-7 I-186.8 I-186.9-10 1-186.11 1-186.12 I-186.13-14 I-186 15 I-186.16 1-186.17 I-186.18-19 I-186.20 I-186.21 I-186.22-23 I-186.24 I-186.25 1-186.26 I-186.27-28

I-186.29

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place to address potential strain on local infrastructure? How will the project impact the availability of affordable housing in the area? Are there any plans to address potential noise pollution from increased aviation activities? How will the project impact the local schools and educational facilities? Has the project considered the potential impact on healthcare services in the area? What measures are in place to address potential emergency response challenges? Are there any plans to mitigate the project's impact on nearby recreational areas? How will the project impact the overall sense of community in the area? Has the project considered the potential increase in light pollution from the airport operations? What measures are in place to address potential safety hazards from increased air traffic? How will the project impact the local flora and fauna in the area? Are there any plans to mitigate the project's impact on migratory bird populations? Has the project considered the potential disruption to local ecosystems from increased aviation activities? What measures are in place to address potential water pollution from airport operations? How will the project impact the overall biodiversity of the area? Are there any plans to preserve or enhance natural habitats in the project area? Has the project considered the potential increase in greenhouse gas emissions from airport operations? What measures are in place to promote sustainable aviation practices? How will the project impact the overall carbon footprint of the region? Are there any plans to offset the project's carbon emissions through environmental initiatives? Has the project considered the potential impact of increased aviation activities on local weather patterns? What measures are in place to address potential climate change effects from airport operations?

Thank you for your attention to these critical issues.

I look forward to your response and further discussion on how we can effectively address these concerns.

Sincerely, Roylene Scott 7741 Coatbridge Dr, Riverside, CA 92508 Roylenescott@gmail.com

Blessings,

Roylene

But for me it is good to be near God: I have made the Lord my refuge, that I may tell of all His works. Psalm 73:28

| -186.37-38 | -186.39 | -186.40 | -186.41 | -186.42 | -186.43-44 | -186.45 | -186.46 | -186.47-48 | -186.50 | -186.51

I-186.30

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I-186.34

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Page 2 of 2 in Comment Letter I-186

Response to Comment Letter I-186

Roylene Scott July 22, 2024

I-186.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-186.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-186.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-186.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-186.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-186.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-186.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-186.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-186.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-186.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-186.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-186.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-186.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-186.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-186.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-186.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-186.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-186.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-186.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-186.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-186.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-186.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-186.23	This comment is FAQ-POP-9. Please see the response to FAQ-POP-9.
I-186.24	This comment is FAQ-POP-3. Please see the response to FAQ-POP-3.
I-186.25	This comment is FAQ-POP-4. Please see the response to FAQ-POP-4.
I-186.26	This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3.
I-186.27	This comment is FAQ-LU-3. Please see the response to FAQ-LU-3.
I-186.28	This comment is FAQ-EJ-7. Please see the response to FAQ-EJ-7.
I-186.29	This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1.
I-186.30	This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4.
I-186.31	This comment is FAQ-POP-7. Please see the response to FAQ-POP-7.
I-186.32	This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1.
I-186.33	This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3.
I-186.34	This comment is FAQ-PUB-8. Please see the response to FAQ-PUB-8.
I-186.35	This comment is FAQ-PUB-2. Please see the response to FAQ-PUB-2.
I-186.36	This comment is FAQ-REC-2. Please see the response to FAQ-REC-2.
I-186.37	This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAQ-MISC-9.
I-186.38	This comment is FAQ-AES-5. Please see the response to FAQ-AES-5.
I-186.39	This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36.
I-186.40	This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15.
I-186.41	This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6.
I-186.42	This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9.
I-186.43	This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17.
I-186.44	This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18.
I-186.45	This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7.
I-186.46	This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

I-186.47	This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
I-186.48	This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
I-186.49	This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
I-186.50	This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
I-186.51	This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
I-186.52	This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

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Comment Letter I-187

1-187.1

Questions and Comments on the Meridian D1 Gateway Aviation Center Project (SCH 2021040012)

Nicole Wengel <nicole_wengel@hotmail.com>

Mon 7/22/2024 10:04 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com> Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). I appreciate the effort put into developing the Draft EIR; however, I believe it is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

The EIR must meet CEQA requirements, including an impartial analysis of the proposed project. The information and analysis must be presented unbiasedly; that is, the EIR and any project-related technical reports must not suggest in any way that the project should be approved or favored. In keeping with this admonition, project alternatives must not be formulated in such a way as to support the proposed project. Alternatives must meet the spirit and intent of CEQA in that they must be feasible and reduce or avoid the significant impacts resulting from the proposed project.

The proposed Project is inconsistent in multiple ways. The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.

Additionally, the Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.

Furthermore, March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations

I have serious concerns about the viability of this project, its influence on the community, and its effect on the quality of life for the residents in the area.

More specifically, I would like to comment and question the following related to the EIR:

on communities surrounding the Air Force Base.

How will the project impact the local wildlife and ecosystems?	I I-187.2
Are there any endangered species in the project area that could be affected?	I I-187.3
What measures are in place to protect water quality in the surrounding areas?	I I-187.4
Has the potential impact on groundwater been thoroughly assessed?	I I-187.5
Are there any plans to mitigate the project's impact on air quality?	I I-187.6
How will the project affect the overall noise levels in the area?	I I-187.7
What steps will be taken to minimize light pollution from the project?	I I-187.8
Has the project considered the long-term effects on climate change?	I I-187.9
Are there any plans for sustainable energy use in the project?	I I-187.10
How will the project impact local traffic patterns and congestion?	I I-187.11
What measures are in place to ensure the safety of pedestrians and cyclists in the area?	I I-187.12
Has the project considered the potential increase in accidents due to increased traffic?	1-187.13
Are there any plans to improve public transportation access to the project site?	T 1-187.14
How will the project impact the quality of life for nearby residents?	T -187.15
What measures are in place to address potential health risks associated with the project?	T -187.16

Has the project considered the cumulative impact of other nearby developments?	I I-187.17
Are there any plans to address potential environmental justice concerns in the project area?	Ī I-187.18
How will the project affect the visual aesthetics of the surrounding area?	I I-187.19
Are there any plans to preserve or enhance the natural beauty of the project site?	I I-187.20
Has the project considered the impact on property values in the surrounding area?	<u>I</u> I-187.21
What measures are in place to address potential soil contamination from the project?	I -187.22
How will the project impact the local economy and job market?	I I-187.23
Are there any plans to mitigate the project's impact on local businesses?	I I-187.24
Has the project considered the potential displacement of residents or businesses?	I I-187.25
What measures are in place to address potential cultural heritage sites in the project area?	I I-187.26
How will the project impact the overall community cohesion and social dynamics?	I I-187.27
Are there any plans to address potential gentrification issues in the project area?	T I-187.28
Has the project considered the potential increase in demand for public services?	- I-187.29
What measures are in place to address potential strain on local infrastructure?	Ī I-187.30
How will the project impact the availability of affordable housing in the area?	I I-187.31
Are there any plans to address potential noise pollution from increased aviation activities?	I I-187.32
How will the project impact the local schools and educational facilities?	I I-187.33
Has the project considered the potential impact on healthcare services in the area?	I I-187.34
What measures are in place to address potential emergency response challenges?	I I-187.35
Are there any plans to mitigate the project's impact on nearby recreational areas?	I I-187.36
How will the project impact the overall sense of community in the area?	I I-187.37
Has the project considered the potential increase in light pollution from the airport operations?	I I-187.38
What measures are in place to address potential safety hazards from increased air traffic?	I I-187.39
How will the project impact the local flora and fauna in the area?	I I-187.40
Are there any plans to mitigate the project's impact on migratory bird populations?	I I-187.41
Has the project considered the potential disruption to local ecosystems from increased aviation activities?	I I-187.42
What measures are in place to address potential water pollution from airport operations?	I I-187.43
How will the project impact the overall biodiversity of the area?	I I-187.44
Are there any plans to preserve or enhance natural habitats in the project area?	- -187.45
Has the project considered the potential increase in greenhouse gas emissions from airport operations?	T I-187.46
What measures are in place to promote sustainable aviation practices?	T I-187.47
How will the project impact the overall carbon footprint of the region?	T I-187.48
Are there any plans to offset the project's carbon emissions through environmental initiatives?	T I-187.49
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Page 2 of 3 in Comment Letter I-187

Has the project considered the potential impact of increased aviation activities on local weather patterns?

Under the project considered the potential impact of increased aviation activities on local weather patterns?

In 1-187.50

Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.

Sincerely,

Nicole Wengel (949) 554-8874 9288 Archwood Court Riverside, CA 92508 nicole_wengel@hotmail.com

Page 3 of 3 in Comment Letter I-187

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Response to Comment Letter I-187

Nicole Wengel July 22, 2024

I-187.1	This comment is the FAQ Introduction. As such, please see the FAQ Introduction Response.
I-187.2	This comment is FAQ-BIO-17. Please see the response to FAQ-BIO-17.
I-187.3	This comment is FAQ-BIO-1. Please see the response to FAQ-BIO-1.
I-187.4	This comment is FAQ-HYD-21. Please see the response to FAQ-HYD-21.
I-187.5	This comment is FAQ-HYD-4. Please see the response to FAQ-HYD-4.
I-187.6	This comment is FAQ-AQ-2. Please see the response to FAQ-AQ-2.
I-187.7	This comment is FAQ-NOI-7. Please see the response to FAQ-NOI-7.
I-187.8	This comment is FAQ-AES-12. Please see the response to FAQ-AES-12.
I-187.9	This comment is FAQ-GHG-7. Please see the response to FAQ-GHG-7.
I-187.10	This comment is FAQ-ENG-1. Please see the response to FAQ-ENG-1.
I-187.11	This comment is FAQ-TRA-10. Please see the response to FAQ-TRA-10.
I-187.12	This comment is FAQ-TRA-16. Please see the response to FAQ-TRA-16.
I-187.13	This comment is FAQ-TRA-5. Please see the response to FAQ-TRA-5.
I-187.14	This comment is FAQ-TRA-3. Please see the response to FAQ-TRA-3.
I-187.15	This comment is FAQ-EJ-10. Please see the response to FAQ-EJ-10.
I-187.16	This comment is FAQ-AQ-13. Please see the response to FAQ-AQ-13.
I-187.17	This comment is FAQ-CUMULATIVE-1. Please see the response to FAQ-CUMULATIVE-1.
I-187.18	This comment is FAQ-EJ-1. Please see the response to FAQ-EJ-1.
I-187.19	This comment is FAQ-AES-6. Please see the response to FAQ-AES-6.
I-187.20	This comment is FAQ-AES-4. Please see the response to FAQ-AES-4.
I-187.21	This comment is FAQ-MISC-3. Please see the response to FAQ-MISC-3.
I-187.22	This comment is FAQ-HAZ-37. Please see the response to FAQ-HAZ-37.

I-187.23 This comment is FAQ-POP-9. Please see the response to FAQ-POP-9. I-187.24 This comment is FAQ-POP-3. Please see the response to FAQ-POP-3. I-187.25 This comment is FAQ-POP-4. Please see the response to FAQ-POP-4. I-187.26 This comment is FAQ-CUL-3. Please see the response to FAQ-CUL-3. I-187.27 This comment is FAQ-LU-3. Please see the response to FAQ-LU-3. I-187.28 This comment is FAO-EJ-7. Please see the response to FAO-EJ-7. I-187.29 This comment is FAQ-PUB-1. Please see the response to FAQ-PUB-1. I-187.30 This comment is FAQ-UTL-4. Please see the response to FAQ-UTL-4. I-187.31 This comment is FAQ-POP-7. Please see the response to FAQ-POP-7. I-187.32 This comment is FAQ-NOI-1. Please see the response to FAQ-NOI-1. I-187.33 This comment is FAQ-PUB-3. Please see the response to FAQ-PUB-3. I-187.34 This comment is FAO-PUB-8. Please see the response to FAO-PUB-8. I-187.35This comment is FAO-PUB-2. Please see the response to FAO-PUB-2. I-187.36 This comment is FAQ-REC-2. Please see the response to FAQ-REC-2. I-187.37 This comment is recorded as FAQ-LU-4 and FAQ-MISC-9. Please see the responses to FAQ-LU-4 and FAO-MISC-9. I-187.38 This comment is FAQ-AES-5. Please see the response to FAQ-AES-5. I-187.39 This comment is FAQ-HAZ-36. Please see the response to FAQ-HAZ-36. I-187.40 This comment is FAQ-BIO-15. Please see the response to FAQ-BIO-15. I-187.41 This comment is FAQ-BIO-6. Please see the response to FAQ-BIO-6. I-187.42 This comment is FAQ-BIO-9. Please see the response to FAQ-BIO-9. I-187.43 This comment is FAQ-HYD-17. Please see the response to FAQ-HYD-17. I-187.44 This comment is FAQ-BIO-18. Please see the response to FAQ-BIO-18. I-187.45 This comment is FAQ-BIO-7. Please see the response to FAQ-BIO-7. I-187.46 This comment is FAQ-GHG-8. Please see the response to FAQ-GHG-8.

- **I-187.47** This comment is FAQ-ENG-10. Please see the response to FAQ-ENG-10.
- **I-187.48** This comment is FAQ-GHG-12. Please see the response to FAQ-GHG-12.
- **I-187.49** This comment is recorded as FAQ-ENG-2 and FAQ-GHG-3. Please see the responses to FAQ-ENG-2 and FAQ-GHG-3.
- **I-187.50** This comment is FAQ-MISC-4. Please see the response to FAQ-MISC-4.
- **I-187.51** This comment is FAQ-GHG-13. Please see the response to FAQ-GHG-13.
- **I-187.52** This comment is conclusory in nature. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

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Comment Letter I-188

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

dds_mail <dds_mail@att.net>

Mon 7/22/2024 12:04 PM

To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Dawn Villavicencio 92508

Sent from my T-Mobile 4G LTE Device

1-188.1

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Response to Comment Letter I-188

Dawn Villavicencio July 22, 2024

I-188.1 This comment is Form Letter A. As such, please see Form Letter A Response.

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Comment Letter I-189

Meridian D1 Gateway Aviation Center project (SCH 2021040012) DEIR

Debbie Walsh abilene149@gmail.com

Mon 7/22/2024 11:03 AM

To:Jeffrey Smith <smith@marchjpa.com>;CBFCentury@aol.com <CBFCentury@aol.com>

1 attachments (103 KB)

RAMVlettermarchair.pdf;

Mr. Smith please find the attached comment letter regarding the Meridian D1 Gateway Aviation Center project DEIR.

Please submit this comment letter into the record.

Thank you.

Debbie Walsh

Rural Association of Mead Valley Debbie Walsh abilene149@gmail.com PO BOX 2244 Perris, CA 92572

Jeffrey M. Smith, AICP Principal Planner March Joint Powers Authority 14205 Meridian Parkway, Suite 140 Riverside, CA 92518

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to the EJ Community of Mead Valley and the Greater Mead Valley Area. In addition, there are numerous other EJ Communities near the March Air Reserve Base. The City of Riverside, Moreno Valley, Perris and other communities that are under the flight path of the cargo airplanes will be adversely impacted by the noise, pollution and health impacts from this Project that are not addressed in the DEIR. In fact, the DEIR has failed to include the Environmental Justice Element into the document. This must be added to the DEIR.

I-189.2 I-189.3 I-189.4

Please Consider:

1) ALTERNATIVE 4: NO ACTION ALTERNATIVE

The No Project/No Development Alternative considers no development on the Project site beyond that which occurs under existing conditions. As such, the entire site would remain vacant and undeveloped, and no improvements would be made to the Project site.

I-189.5

There is ample cargo space at the Norton Site. Former Norton Air Force Base now a logistics hub with UPS, FedEx and Amazon can be expanded to provide more air cargo planes. Our communities cannot endure the huge substantial impacts from this Project. Of over 10,000 increased flights over our homes day and night. Over half a million people will be impacted day and night by the expansion of the Cargo Port.

I-189.6

Particulate matter and harmful gases from diesel emissions will contribute to high rates of asthma, cancer and premature death to residents especially children from this Project. The Communities near March Reserve Air Base already have the second worse air pollution in the nation. Over 10,000 more flights would increase air pollution substantially and increase the air pollution to number one in the nation. Impacts from this Project would be significant and unavoidable. There is no way to mitigate the impacts below significant and unavoidable.

I-189.7

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There is no need to expand cargo flights at the March Air Reserve Base when a better option nearby is available that will not impact local communities near the March Air Reserve base. Therefore the best option is ALTERNATIVE 4: NO ACTION ALTERNATIVE.	e
The communities surrounding March Air Reserve Base are Environmental Justice Communities. The impacts to these communities will be severe.	I-189.9 I-189.10
1) Aircraft noise will have a negative effect on the health of our community. Our community is listed as an Environmental Justice Community. The south end of the runway at March A Reserve Base is directly west of the community of Mead Valley and the noise is already extremely loud when cargo planes are loaded and taking off. This is where you plan to have your expanded facility. The noise will increase 3 times as much as we currently have. Flights over homes are only part of the noise impacts and not addressed. Noise from the airplanes on the runway and starting down the path to the runway is extremely loud and cabe heard for miles. Loaded cargo planes make substantially more noise and pollution that unloaded planes. The Draft EIR does not address this noise and its impacts to the resident living in the surrounding communities and cities.	e -189.12
Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease from these noise impacts.	-189.13
2) The Draft EIR does not consider the true noise impacts on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, Mead Valley, Lake Mathews, Perris and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.	S
3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.	T I-189.15
4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.	1-189.16
5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM) during flight and before flight. Cargo Planes that are loaded with freight emit substantially more greenhouse gases than unloaded and passenger plans. Cargo Planes emit (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM) when taxiing, planes taking off and in flight. Cargo Planes emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM) during flight and before flight. Cargo Planes that are loaded with freight emit substantially more greenhouse gases (GHG such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM) and will severely impact local environmental justice communities if approved. This has not been addressed in the DEIR. Half the flights will be loaded cargo flights and emit substantially more emission and noise than unloaded planes. This has not been addressed in the DEIR	I-189.17

Page 3 of 4 in Comment Letter I-189

6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.	-189.18
7) Cargo plane noise can adversely affect the academic performance of our children.	-189.19
8) Many of these communities near the air cargo port are included in the Environmental Justice Communities. Mead Valley, Moreno Valley Orange Crest, Mission Grove, Perris, Nuevo. Environmental Justice is not included in the DEIR.	I-189.20
9) The residents were not notified of this DEIR. MARCH JPA only gave notice 300 feet from the Project site where no residents live. Everyone that is impacted by this Project must be given proper notice. All those who are in the flight path must be notified of the project and its pollution impacts and noise impacts.	I-189.21
9) The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.	I-189.22
10) We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects.	I-189.23 I-189.24
The No Project/No Development Alternative considers no development on the Project site beyond that which occurs under existing conditions. As such, the entire site would remain vacant and undeveloped, and no improvements would be made to the Project site.	I-189.25
Please consider the No Project Alternative. There is no reason to expand cargo operations at March Air Reserve Base when other locations that are more suitable are available.	I-189.26 I-189.27
The Rural Association of Mead Valley is asking that the No Project/No Development Alternative be considered and approved.	-189.28

Thank you.

Sincerely,

Debbie Walsh President, RAMV

Oullie Walsh

Page 4 of 4 in Comment Letter I-189

Response to Comment Letter I-189

Rural Association of Mead Valley Debbie Walsh July 22, 2024

- **I-189.1** This comment is a transmittal email. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-189.2 This comment generally states that the analysis in the EIR is inadequate with regard to impacts to environmental justice communities but does not list any specific concerns. Specific issues are addressed below.
- I-189.3 This comment alleges the EIR does not address noise, pollution, and health impacts to the Cities of Riverside, Moreno Valley, and Perris. The EIR analyses potential Proposed Project impacts to air quality in Section 3.1, Air Quality, and to noise in Section 3.11, Noise. A Health Risk Assessment (HRA) (Appendix C-1) was prepared for the Proposed Project. As stated in Section 3.1, Air Quality, the results of the HRA indicate that the Proposed Project would not result in any significant health risk impacts. Thus, impacts to sensitive receptors would be less than significant.
- I-189.4 This comment alleges the EIR does not include the March JPA Environmental Justice Element. As analyzed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project was found to be generally consistent with the goals and policies identified in the March JPA General Plan, including the Environmental Justice Element.
- **I-189.5** This comment provides a summary of the No Project/No Development Alternative. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-189.6 This comment proposes an alternate site at the former Norton Air Force Base, which is now San Bernardino International Airport. Alternatives considered but rejected, including an alternate site alternative, are included in Chapter 5, Alternatives, As explained in Section 5.3.1, Alternate Site, after a review of available open spaces of approximately 34 acres (similar to the Air Cargo Center Component) around MIP Airport, no additional sites that could accommodate the Proposed Project were found. Additionally, the project applicant does not have ownership of 34 acres elsewhere within the project vicinity such that the Proposed Project could be developed on an alternate site. Therefore, off-site locations capable of accommodating the entire Proposed Project are considered infeasible, and no off-site location alternatives were carried forward in this analysis. The comment also suggests the Proposed Project would add 10,000 flights over residential neighborhoods "day and night." For clarification of terminology, a "flight" is composed of two flight operations: a take-off and a landing. The numbers referenced by the comment relate to flight operations, not flights. Further, in consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-189.7 This comment raises concerns as to the health impacts from Proposed Project emissions. The impacts to air quality by the Proposed Project are discussed in Section 3.1, Air Quality. The Project HRA (Appendix C-1) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from Proposed Project construction with the incorporation of MM-AQ-1 (Construction Management Plan) or from Proposed Project operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. As discussed in Response I-189-6, above, the numbers referenced by the comment relate to flight operations, not flights.
- **I-189.8** This comment expresses general opposition to the Proposed Project. Chapter 5, Alternatives, of the EIR, analyzes the alternatives, including the No Action/No Development Alternative.
- I-189.9 This comment states that the communities surrounding March ARB are environmental justice communities. An analysis of environmental justice is not required by CEQA. Appendix G thresholds do not include environmental justice. However, the March JPA General Plan includes an Environmental Justice Element. As analyzed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project was found to be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element.
- Ithis comment raises concerns regarding the impacts of noise on health. Consistent with Goal 2 from the March JPA General Plan Noise/Air Quality Element, the Proposed Project aims to "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." In 2008, the National Academies of Sciences, Engineering, and Medicine released "Effects of Aircraft Noise: Research Update on Select Topics," which states "[t]rying to identify, measure, and quantify any potential effects of aviation noise on health is a complex and difficult field of study. Variations on how to identify and/or measure the noise exposure itself (single dose, long-term average, number of events above a certain level, etc.), and attempting to separate the effects from other life events are difficult at best. For example, lifestyles, life's stressors, hereditary factors, and genetic composition are just a few factors that may distort potential results of an aviation noise health effects study." The report reviewed:
 - Cardiovascular effects: "Some studies have identified a potential correlation between increased hypertension and aviation or road noise above certain noise thresholds; however, other studies contradict such findings. Occupational noise often becomes an intricate concern."
 - Effects on children: "Neither psychiatric disorders nor environmental factors showed any relationship to noise; however, psychophysiological parameters (e.g., heart rate and muscle tension) did demonstrate some relationship to noise."
 - Hospitals and care facilities: "Most airport noise and land-use compatibility guidelines list hospitals and care facilities as noise-sensitive uses, although there are no studies that have identified health effects associated with aviation noise."

MERIDIAN D-1 GATEWAY AVIATION CENTER PROJECT FINAL EIR DECEMBER 2025

March JPA (Joint Powers Authority). 1999. *General Plan of the March Joint Powers Authority*. https://www.marchjpa.com/documents/docs_forms/general_plan_updt_011718.pdf.

National Academies of Sciences, Engineering, and Medicine. 2008. Effects of Aircraft Noise: Research Update on Select Topics. Washington, DC: The National Academies Press. https://doi.org/10.17226/14177.

Hearing impairment: "Recent studies conclude aviation noise does not pose a risk factor for child or adolescent hearing loss, but perhaps other noise sources (personal music devices, concerts, motorcycles, or night clubs) are a main risk factor. Because aviation and typical community noise levels near airports are not comparable to the occupational or recreational noise exposures associated with hearing loss, hearing impairment resulting from community aviation noise has not been identified."

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-189.11 This comment states that the community is an environmental justice community. An analysis of environmental justice is not required by CEQA. Appendix G thresholds do not include environmental justice. However, the March JPA General Plan includes an Environmental Justice Element. As analyzed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project was found to be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element.
- I-189.12 This comment states air cargo noise is already loud in Mead Valley and alleges the Proposed Project's noise would be "3 times as much." Mead Valley is west of I-215 and southwest of March ARB/Inland Port Airport. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. While military and cargo aviation may be audible at locations within the Mead Valley neighborhood, as shown in Figure 3.11-3 of the EIR, Mead Valley is outside the 60 dBA contour line. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near Mead Valley. These two figures display the loudest noise level contours aligned with the runway, where the aircraft are lowest to grade. The AEDT aviation noise modeling software used to predict project cargo aviation operations has incorporated relevant flight operations characteristics that include parameters such as flight tracks and their origin points; hence, the EIR applied appropriate methodology to assess potential Proposed Project-attributed aviation noise impacts to the surrounding communities. Further, as shown in Exhibit 3.11-1, Noise Level Increase Perception, of the EIR, a 1 dB increase is just perceptible, a 3 dB increase is barely perceptible, a 5 dB increase is readily perceptible, and a 10 dB increase is perceived as twice as loud. As shown in Table 3.11-56, the highest noise increase for a sensitive receptor is only 1.8 dB. No sensitive receptor would be subjected to "3 times as much" noise.
- I-189.13 This comment is paragraph 2 of Form Letter B. As such, see Form Letter B Response and Response I-189.10, above.

I-189.14 This comment raises concerns about noise impacts to residential neighborhoods to the west of I-215, Mission Grove, Canyon Crest, Orangecrest, Woodcrest, Mead Valley, and Lake Mathews. As discussed in Section 3.11, Noise, of the EIR, all the flights throughout the year (including type of aircraft, time of day, direction, landing/takeoff) are modeled to develop baseline aircraft noise contours. The EIR utilized the aircraft noise modeling presented in the January 2024 Revised Draft KC-46A EIS, which disclosed existing civilian and military aircraft noise. The existing operations data used in the KC-46A EIS were obtained in June 2022. As shown in Figure 3.11-3 of the EIR, the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, Mead Valley, and Lake Mathews are outside the 60 dBA contour line. As shown in Figures 3.11-11 (non-peak operations) and 3.11-12 (peak operations) of the EIR, the addition of the Proposed Project's aircraft noise would not expand the 60 dBA contour line over or near the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, Woodcrest, Mead Valley, or Lake Mathews.

The comment references the negative impacts of the 2005–2008 DHL cargo flights. As approved, DHL did not have restricted hours of operation, with most flight operations occurring during the nighttime and early morning hours. Further, DHL's aircraft mix included several DC-9s.¹³³ As of 2024, there were fewer than 20 DC-9s still in service.¹³⁴ Developed in the 1960s prior to international and FAA noise standards, the DC-9 was noisier than the 767-300 aircraft evaluated for the Proposed Project.¹³⁵ The Proposed Project is separate from the 2005–2008 DHL flights, which are no longer occurring.

The comment also raises concerns about noise impacts to residential neighborhoods in Perris. As discussed in Section 3.11, Noise, the Proposed Project's aircraft operational noise increases may exceed the applicable noise increase thresholds for noise-sensitive receptors located in the vicinity of the southwest portion of the Markham Street and Brennan Avenue intersection. Due to the nature of noise levels generated by aircraft landings and take-offs (i.e., acoustic energy affecting the roof, walls, windows, and doors), reducing the noise-level increase resulting from airborne operations is difficult. The primary mitigation measures suitable for addressing airborne aircraft noise can include modifications to the flight path, restrictions on hours of operation, limiting the number of flight operations, substituting aircraft type, or providing sound insulation treatment programs for those affected by aviation noise. However, MIPAA does not have the authority to modify flight paths at March ARB/Inland Port Airport or to mandate aircraft types. Additionally, the level of restriction on flight operations and incomplete involvement in sound insulation programs often result in limitations on achieving the necessary noise level reductions. MM-NOI-2 (Future Tenant Aircraft Fleet) requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions.

In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not

¹³³ https://www.freightwaves.com/news/dhl-considers-replacing-noisy-aircraft-at-riverside-operation

https://simpleflying.com/dc-9-operators-2024/

¹³⁵ https://www.pressenterprise.com/2018/08/01/amazon-air-cleared-for-5-cargo-flights-a-day-from-march-air-reserve-base/

include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-189.15 This comment is paragraph 4 of Form Letter B. As such, see Form Letter B Response.
- **I-189.16** This comment is paragraph 4 of Form Letter B. As such, see Form Letter B Response.
- I-189.17 This comment raises general concerns regarding the impact of cargo planes on air quality, greenhouse gases, and noise, and on alleged varying noise levels and emissions of GHGs such as CO2, NOx, and PM during flight and before flight and for loaded/unloaded aircraft. As discussed in Section 3.2, Air Quality; Section 3.7, Greenhouse Gas Emissions; and Section 3.11, Noise, of the EIR, the noise and emissions analysis for aircraft is based on noise and emissions calculations using the FAA AEDT. AEDT uses aircraft- and engine-specific emissions factors to calculate total emissions associated with each operation entered into the model. The AEDT model assumed that the total aircraft operations were equally divided between arrivals and departures. The emissions estimate accounted for departure and arrival taxi emissions and departure and arrival below mixing-height emissions. Because there is no tenant identified, ultimate destinations of the Proposed Project's flights are unknown, and flight distances would be speculative. As such, the emissions estimate provided a reasonable estimate of emissions accounting for the known sources of aircraft emissions. As disclosed in Section 3.7, Greenhouse Gas Emissions, the Proposed Project is not assessed against a numerical threshold, but rather for potential to conflict with applicable GHG reduction plans. The Proposed Project was found not to conflict and would therefore result in a less-than-significant GHG impact. As there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane used in air cargo operations. As discussed in Section 3.2 Air Quality, NO_x and PM₁₀ emissions from aircraft were accounted for, and in Section 3.7, Greenhouse Gases, CO₂ emissions from aircraft were disclosed. See Appendix B-1 of the EIR regarding the varying flight scenarios (e.g. taxiing in, taking off, etc.).

The comment also alleges that the EIR does not address the Proposed Project's impact on environmental justice communities. Section 3.2, Air Quality, of the EIR, specifically, the MATES V discussion, the CalEnviroScreen discussion, and the Healthy Places discussion, provides a description of the existing air quality setting. This section notes the air quality challenges relative to air toxics (higher cancer risk than 22% of the SCAOMD population) and that the project site is in a disadvantaged community, pursuant to Senate Bill 535, and experiences both a higher pollution burden and a lower HPI relative to other census tracts in the state. Section 3.2, Air Quality, identified the significant and unavoidable impacts associated with the Proposed Project relative to consistency with the AOMP for attainment of air quality standards and exceedances of regional thresholds of significance for ozone precursors (VOCs, NOx, and CO). Section 3.2, Air Quality, of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13, the Proposed Project would not exceed the SCAQMD LSTs during construction with the incorporation of MM-AQ-1 and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14, the Proposed Project would not exceed the SCAOMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction and operation. The Project HRA (Appendix C-1) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from Project construction with the incorporation of **MM-AQ-1** or from Project operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. The EIR clearly disclosed the Proposed Project's impacts to the public and decision makers.

- I-189.18 This comment is paragraph 7 of Form Letter B. As such, see Form Letter B Response.
- I-189.19 This comment is paragraph 8 of Form Letter B. As such, see Form Letter B Response.
- I-189.20 This comment states that many communities near the airport are environmental justice communities. An analysis of environmental justice is not required by CEQA. Appendix G thresholds do not include environmental justice. However, the March JPA General Plan includes an Environmental Justice Element. As analyzed in Section 3.10, Land Use and Planning, of the EIR, the Proposed Project was found to be generally consistent with the goals and policies identified in the March JPA General Plan and the Environmental Justice Element.
- I-189.21 This comment states that the public was not notified of the Proposed Project. As discussed in Chapter 1, Introduction, an NOP for the Draft EIR and a description of potential adverse impacts were distributed to the State Clearinghouse, responsible agencies, and other interested parties on March 31, 2021. The public review period for the Initial Study/NOP began on March 31, 2021, and ended on April 29, 2021. During the 30-day public review period of the NOP, March JPA held a scoping meeting on April 14, 2021. All issues and concerns raised in the comments have been fully addressed and analyzed in the Final EIR.

The Draft EIR was distributed for 45-day public review from May 23, 2024, to July 9, 2024, which was extended to July 22, 2024, for a total of 60 days to provide time for additional public input (although not required by CEQA). The applicant held community meetings on June 18, 2024, July 1, 2024, and September 24, 2025. Further, all comments received are responded to in this Final EIR.

- **I-189.22** This comment is paragraph 9 of Form Letter B. As such, see Form Letter B Response.
- I-189.23 This comment is paragraph 10 of Form Letter B. As such, see Form Letter B Response.
- I-189.24 This comment is paragraph 10 of Form Letter B. As such, see Form Letter B Response.
- **I-189.25** This comment summarizes the No Project Alternative. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- **I-189.26** This comment urges adoption of the No Project Alternative. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-189.27 This comment urges consideration of alternate locations. Please see Response I-189.6, above.
- **I-189.28** This comment expresses general opposition to the Proposed Project. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-190

Senanu & Cynthia Spring-Pearson 6195 Oswego Dr. Riverside, CA 92506

Jeffrey M. Smith, AICP smith@marchjpa.com

July 22, 2024

Dear Sir,

We would like to comment on several aspects of the draft EIR for the Meridian D-1 Gateway Aviation Center Project.

1. The D1 Aviation center project is not the only project for which development of March ARB has been proposed. In addition to the aviation project, development of March ARB land has been proposed for construction and operation of warehouse facilities. CEQA requires that the full scope of a project be considered within the same EIR and expressly prohibits 'piecemealing' or 'segmenting' of a project. Such segmenting often results in smaller environmental impacts being addressed than would need to be considered were the entire project to be assessed comprehensively, and this has, without doubt, occurred here. Furthermore, if an activity is a "reasonably foreseeable consequence of approving the project, then it should be considered an integral project component that should be analyzed within the environmental analysis" (CEQAportal.org Topic Paper: Project Description).

I-190.1

In addition to multiple projects being segmented, their combined activity contributes to increased cumulative impact of each. This is likely to affect traffic conditions, air pollution, and greenhouse gas emissions, among others. In conclusion, the aviation project must be considered as part of other development activities at March ARB and any environmental effects must be analyzed in conjunction with those other developments. Although the draft EIR pays lip service to this, the conclusions therein are wholly inadequate. For example, page 3.2.55 states that estimating cumulative effects of air pollution from related projects is difficult or impossible. However, the effects of these pollutants is largely known. Claiming that making estimates is difficult cannot absolve the draft EIR from doing the difficult work.

I-190.2

I-190.3

2. Why were Alternative scenarios 2 & 3 not seriously considered? According to the draft EIR, both of these meet all the objectives, and each provide important improvements over the proposed project. Alternative 2 limits aircraft events to before 10pm, whereas the proposed project allows flights until 11pm. Because noise is a significant environmental concern with serious implications for local residents, limiting nighttime flights would be important. In fact, most families with children would consider 8pm – 9pm to be children's bedtime, after which increased aviation noise would be a very unwelcome addition. If a 10pm limit on flights still meets project objectives, please consider an earlier limit, which is also likely to meet project objectives.

1-190.4

The proposed project assumes that 5% of air traffic would occur between 10-11pm. What guarantees are there that it would be limited to 5%? If 95% of all traffic would occur before 10pm, why not place a hard limit of 10pm (or, preferably, earlier) on the last 5% of flights?

1-190.5

Alternative 3 envisions a reduced number of overall flights, and also meets all the project object According to CEQA, the alternative that meets all objectives but minimizes environmental imposhould be chosen.		
Given that alternatives 2 and 3 BOTH meet the project's objectives, they should be combined so the number of events and the timing of those events are reduced and moved earlier in the day, respectively. The lack of consideration of reasonable alternatives suggests that alternative proponot adequately and seriously considered.	1-190.7	
3. In addition to the increased effects of nighttime flights to the noise levels in the surrounding communities, the draft EIR has failed to consider the effects of prevailing wind patterns in disp pollutants caused by the aviation industry. Despite lip service given in the draft EIR to the air movement patterns, their effects on the local communities is not clearly addressed. Prevailing winds often mitigate the effects of pollutants within the local environment (though they shift the of those pollutants elsewhere.) However, at March ARB, the wind typically dies before sunset,	vesterly e burden	
pollutants to linger in the immediate vicinity of their source. Table 2.1 in the draft EIR anticipates many departures during the evening after the westerly flow has subsided. The communities around March	tes many -190.10	
ARB are already plagued with poor air quality, and this additional burden (at whatever time of	day) is $\int_{-1}^{1-190.11}$	
not insignificant. It is a tragedy that the draft EIR considers the burden on residents' health to be 'significant and unavoidable'. According to Table 3.2-2, several pollutants already reach 'nonattainment' status, resulting in many days each year where the region exceeds federal and state air quality standards. At what point will we stop adding additional pollutants to our air?	1	
	<u>I</u> 1-190.14	
4. We do not understand table 2.1. An average of 17 flights per day should result in 12,410 flight counts as 2 events), with additional flights during the month of December (peak). This is significantly more than the 10,608 flights in table 2.1.	hts (each	
5. We find the estimates of probability (\sim 5%) of a person would be awaken by an aircraft making over 65dB noise wholly unbelievable. The draft EIR must outline the methodology and assumptions made within this document rather than outsourcing it. Nevertheless, it is disappointing that our communities will be impacted by "significant and unavoidable" additional noise in order to serve the commercial interests of large, multinational corporations.	made	
6. The draft EIR has addressed queuing times at several intersections along the area's freeways However, the 215/60 interchange, which is closest to March ARB, is almost always slow simple the volume of traffic flowing through the interchange. Additional truck traffic will make this w	y due to TI-190.20 orse and	
aply analyzing queuing time at a few entry/exit ramps is insufficient to address the additional allenges faced by local residents that the aviation project will impose.	l -190.21	

Sincerely,

Dr. Senanu & Cynthia Spring-Pearson Residents of Riverside, CA 92506

Page 2 of 2 in Comment Letter I-190

Response to Comment Letter I-190

Dr. Senanu and Cynthia Spring-Pearson July 22, 2024

- I-190.1 This comment expresses concern that the Proposed Project was piecemealed from other developments within March ARB but does not identify any specific development. Chapter 2, Project Description, accounts for the full scope of the Proposed Project. There was no piecemealing. Chapter 3, Environmental Analysis, Table 3-1 presents the cumulative projects surrounding the project site, capturing the March JPA Planning Area and surrounding areas. The projects listed are also shown in Figure 3-1.
- I-190.2 This comment questions the cumulative impacts analysis. As discussed in Chapter 3, Environmental Analysis, cumulative projects that fall within the built (on-ground) environment and the aviation/aircraft flight environment are assessed for cumulative impacts within each environmental issue area identified throughout the environmental analysis section of this EIR. For purposes of this analysis, the aviation/aircraft flight environment cumulative impacts are assessed in Section 3.2, Air Quality; Section 3.5, Energy; Section 3.7, Greenhouse Gas Emissions; and Section 3.11, Noise. The cumulative aviation/aircraft flight impact assessment is limited to these sections because aviation uses are anticipated to generate additional air quality and greenhouse gas emissions, use additional energy fueling resources, and generate additional noise through the use of aircraft.
- I-190.3 This comment disagrees with the EIR's discussion of the difficulty of estimating cumulative effects for air pollution. Section 3.2 relied on the technical expertise of SCAQMD and SJVAPCD 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.
- I-190.4 This comment questions why a combination of Alternatives 2 and 3 was not considered. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-190.5 This comment discusses the amount of Proposed Project flights that would occur between 10:00 p.m. And 11:00 p.m. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Please refer to Chapter III, Errata, of this Final EIR for details.
- I-190.6 This comment alleges that CEQA requires the selection of Alternative 3. As discussed in Chapter 5, Alternatives, of the EIR, the inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is, in fact, "feasible." The final decision regarding the feasibility of alternatives lies with the decision maker for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives

and reduces the severity of significant environmental effects pursuant to CEQA (California Public Resources Code Section 21081; refer also to 14 CCR 15091). As discussed in Section 5.5, Environmentally Superior Alternative, Alternative 3 would reduce flight operations by 10% compared to the Proposed Project; however, air quality impacts would remain significant and unavoidable. Additionally, the ambient noise level increase that would occur under Alternative 3 would exceed the relative increase thresholds, resulting in noise impacts that would be similar to the Proposed Project. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.

- I-190.7 This comment requests the consideration of a combination of Alternatives 2 and 3. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-190.8 This comment expresses concern regarding a lack of alternatives analyzed. Chapter 5, Alternatives, of the EIR includes a reasonable range of alternatives that would feasibly attain most of the basic objectives of the Proposed Project but would avoid or substantially lessen any of the significant effects of the Proposed Project. In consideration of public input, the applicant has elected to pursue Alternative 6, the Reduced Aviation Noise Alternative, which would reduce Proposed Project operations by approximately 30% and not include any nighttime flights (i.e., flights between 10:00 p.m. and 7:00 a.m.). Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated. For a further discussion of Alternative 6, please see Chapter III, Errata, of this Final EIR.
- I-190.9 This comment alleges the EIR did not consider the effects of prevailing wind patterns in dispersing pollutants. Section 3.2, Air Quality, of the EIR explains the importance of wind to the dispersion and transport of air pollution and details the regional wind patterns within the SCAB. Further, meteorological data from SCAQMD's Perris Valley monitoring station (SRA 24, Air Quality Station ID 060656001) were used to represent local weather conditions and prevailing winds for analysis purposes.
- I-190.10 This comment is in regard to Table 2-1 of the EIR and states the evening departures will reportedly occur after the westerly winds have subsided for the day. As discussed in Response I-190.9, above, meteorological data from SCAQMD's Perris Valley monitoring station (SRA 24, Air Quality Station ID 060656001) were used to represent local weather conditions and prevailing winds for analysis purposes.
- I-190.11 This comment expresses concern about the existing air quality of communities surrounding March ARB. As explained in Section 3.2 of the EIR, the Proposed Project's impacts regarding the potential to conflict with or obstruct implementation of SCAQMD's 2022 AQMP would be significant and unavoidable. Additionally, the Proposed Project would result in a significant and unavoidable impact regarding

cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.

- I-190.12 This comment expresses concerns about the health impacts the Proposed Project would have with regard to air quality. Section 3.2 of the EIR evaluated potential health risks associated with increased pollution from criteria air pollutants and from TACs in the form of DPM. In addition to the regional emission-based thresholds shown in Table 3.2-4 of the EIR, 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. As shown in Table 3.2-13, the Proposed Project would not exceed the SCAOMD LSTs during construction with the incorporation of MM-AO-1 (Construction Management Plan) and MM-AQ-2 (Construction Requirements). As shown in Table 3.2-14, the Proposed Project would not exceed the SCAOMD LSTs during operations. Therefore, nearby sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction and operation. The Project Health Risk Assessment (Appendix C-1) evaluated potential health risk impacts during construction and operation. The Proposed Project would not result in any significant health risk impacts from exposure to TACs from Project construction with the incorporation of MM-AO-1 or from Project operations. As shown in Table 3.2-16, the Proposed Project would result in a less-than-significant human health or cancer risk to adjacent land uses as a result of construction and operational activity. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- I-190.13 This comment notes that several pollutants already reach nonattainment status. As discussed in Section 3.2, nonattainment status of regional pollutants is a result of past and present development, and SCAQMD develops and implements plans for future attainment of ambient air quality standards. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- **I-190.14** This comment questions when pollutants will no longer be released into the air. The comment does not raise any specific concerns, issues, or questions regarding the adequacy of the environmental analysis in the EIR.
- I-190.15 This comment suggests the EIR underestimates the number of flights. However, flight operations would only occur 6 days a week, not 7, which appears to be the basis for the comment's identified numbers. Further, the Project Description has been revised to be clear that, during the non-peak season, there would be a maximum of 17 flights per day and that during the peak season, there would be a maximum of 21 flights per day. This revision does not constitute "new information" under CEQA and does not impact the environmental analysis in the EIR.
- I-190.16 This comment opines on the believability of an estimated sleep-awakening probability value due to Proposed Project aviation traffic, which has been examined in Appendix L-2 (the sleep disturbance technical report) by a qualified firm that is on the team of listed preparers for the EIR and using cited methodology (American National Standards Institute [ANSI] Technical Report ASA TR S12.9-2018/Part 6 Rationale for Withdrawing S.12.9-2008/Part 6 Methods for Estimation of Awakenings Associated with Outdoor Noise Events Heard In Homes) that includes two Informative Annexes (B and C) containing algorithms upon which predictive calculations for sleep awakening probabilities for habituated and new

receptors, respectively, were based and reported therein. Section 3.11, Noise, of the EIR summarized and explained the results from Appendix L-2.

- **I-190.17** This comment suggests the EIR must include all methodology and assumptions rather than "outsourcing it." Please refer to Response I-190.16, above.
- I-190.18 The comment expresses general opposition to the Proposed Project because of the significant and unavoidable noise impact. CEQA does not prohibit agencies from approving projects with significant and unavoidable impacts. After applying all feasible mitigation, an agency can approve such a project with a statement of overriding conditions. No comments, questions, or concerns about the environmental analysis included in EIR are raised.
- I-190.19 This comment discusses the EIR evaluated queuing times at intersections along the area's freeways. Traffic impacts are discussed in Section 3.12, Transportation, of the EIR, and a transportation analysis is provided in Appendix M-1 of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-190.20 This comment describes the existing traffic conditions at the I-215/State Route 60 (SR-60) interchange. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-190.21 This comment states increased truck traffic will negatively affect traffic conditions at the I-215/SR-60 interchange and was not discussed as part of the queuing analysis. The Project Traffic Analysis (Appendix M-1) provides analysis of LOS for informational purposes only and does not indicate impacts under CEQA. Peak-hour intersection operation analysis (delay and associated LOS) is no longer the measure of effectiveness used to determine traffic impact and mitigation measures for CEQA. With implementation of MM-TRA-1 (Construction Transportation Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street), the Proposed Project's transportation impacts would be less than significant.

Comment Letter I-191

Re: Meridian D-1 Gateway Aviation Center Project Draft EIR: Extension of Public Comment Period
Erik Ruehr <eruehr@vrpatechnologies.com> Tue 7/23/2024 7:45 AM To:Jeffrey Smith <smith@marchjpa.com></smith@marchjpa.com></eruehr@vrpatechnologies.com>
1 attachments (645 KB) Gateway Aviation Center - VRPA Review 7-23-24.pdf;
Hi Jeff,
I apologize for missing yesterday's deadline, but VRPA's comments are attached. If you have any questions or if you would like to see any changes, please let me know.
Erik
Traffic Engineering, Civil Engineering, Transportation Planning Environmental Assessment, Public Outreach
Erik O. Ruehr, P.E., T.E., PTOE Director of Traffic Engineering VRPA Technologies, Inc. 9747 Businesspark Avenue, Suite 210 San Diego, CA 92131
Direct: 858/361-7151 Office: 858/566-1766
An SBE & WBE Certified Firm
Website: www.vrpatechnologies.com
On Wed, 3 Jul 2024 20:45:07 +0000, Jeffrey Smith <smith@marchjpa.com> wrote:</smith@marchjpa.com>
Good Afternoon:

The March Joint Powers Authority (March JPA) has extended the comment period on the Draft Environmental Impact Report (Draft EIR) for the Meridian D-1 Gateway Aviation Center Project (State Clearinghouse Number 2021040012). The comment period will now end on Monday, July 22, 2024. As noted on the Notice of Availability, the Draft EIR is available for review at the March JPA's office or on the March JPA's webpage at:

• https://marchjpa.com/meridian-d1-gateway-aviation-center-project/

For more information, please refer to the attached notice.

Thank you.

Jeffrey M. Smith, AICP

Principal Planner

March Joint Powers Authority

14205 Meridian Parkway, Suite 140

Riverside, CA 92518

Phone: (951) 656-7000

Cell: (951) 807-7283

Fax: (951) 653-5558

Email: smith@marchipa.com

Web: www.marchjpa.com

PLEASE VISIT WWW.MARCHJPA.COM OR CALL

(951) 656-7000 FOR MORE INFORMATION. THANK YOU.

Page 2 of 3 in Comment Letter I-191



July 23, 2024

Jeffrey Smith Principal Planner March Joint Powers Authority 14205 Meridian Parkway, Ste. 140 Riverside, CA 92518

Re: Meridian D-1 Gateway Aviation Center Project

Dear Jeff:

VRPA Technologies (VRPA) has reviewed the Draft EIR dated May 2024 as well as the transportation-related technical appendices for the referenced project. Our comments are as follows:	1-191.2
The technical analysis related to traffic analysis and VMT analysis is appropriate we are not requesting any changes.	1-191.3
Although the roadway improvements and fair share contributions toward roadway improvements identified in the traffic analysis are not CEQA mitigation measures, the applicant will need to work with March JPA to provide improvements and fair share payments as conditions of approval of the project.	-191.4
If you have any questions regarding this letter, please feel free to contact me. I can be reached by email at eruehr@vrpatechnologies.com or by phone at (858) 361-7151.	I-191.5

Sincerely,

Erik O. Ruehr, P.E., Director of Traffic Engineering

VRPA Technologies, Inc.

TRANSPORTATION PLANNING • TRAFFIC ENGINEERING • ENVIRONMENTAL ASSESSMENT • SUSTAINABLE COMMUNITIES PLANNING • PUBLIC OUTREACH

9747 Businesspark Avenue, Suite 210, San Diego, CA 92131 • Phone (858) 566-1766 • Fax (559) 271-1269 www.vrpatechnologies.com

Page 3 of 3 in Comment Letter I-191

Response to Comment Letter I-191

VRPA Technologies Erik Ruehr July 23, 2024

- **I-191.1** This comment is a transmittal email. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- **I-191.2** This is a general introductory comment. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- **I-191.3** This comment states that the transportation analysis is appropriate and no changes are required. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.
- I-191.4 This comment states that the applicant will need to work with March JPA to provide improvements and fair-share payments as conditions of approval. As noted in the comment, the improvements and fair-share payments are included in Section 3.12, Transportation, of the EIR. In response to a request from the City of Moreno Valley (see Response A-6.11), PDF-TRA-1 has been revised to include a fair-share contribution for pavement maintenance for specified roadways over a 30-year cycle. Although Project Design Features are already part of the Proposed Project, they will also be included as separate conditions of approval and included in the Mitigation Monitoring and Reporting Program (MMRP). MIPAA will monitor compliance through the MMRP. Please see Chapter IV, MMRP, of this EIR for the revised language of PDF-TRA-1.
- **I-191.5** This is a general closing comment. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

Comment Letter I-192

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Ajay Shah <ajayatsc@yahoo.com>

Tue 7/23/2024 1:20 PM
To:Jeffrey Smith <smith@marchjpa.com>

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Ajay Shah 92508 1-192.1

Response to Comment Letter I-192

Ajay Shah July 23, 2024

I-192.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-193

Stop Expansion at March Field

Mark Howard <mark951@icloud.com>

Tue 7/23/2024 2:03 PM

To:Jeffrey Smith <smith@marchjpa.com>

The expansion of commercial air cargo at March Field should not occur. Too much noise and traffic. I-193.1

Mark Howard Concerned Citizen Riverside, CA

Response to Comment Letter I-193

Mark Howard July 23, 2024

I-193.1 This comment expresses general opposition to the Proposed Project because of noise and traffic. Noise impacts are addressed in Section 3.11, Noise, of the EIR. Traffic impacts are addressed in Section 3.12, Transportation, of the EIR. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.

Comment Letter I-194

Eden Vitakis

Sent:

Carlos LLiguin <malinalli_1997@yahoo.com>

Wednesday, July 24, 2024 7:41 AM

To:

Jeffrey Smith

Subject:

Public Comment for Meridian D1 Gateway Aviation Center Draft EIR (SCH 2021040012)

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, even though these neighborhoods were severely impacted by the 2005-2008 March cargo
- 3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.

Residents are disappointed that the March JPA has not learned its lessons from the cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. Please consider less environmentally-harmful, community-focused alternatives.

Thank you.

Sincerely, Carlos Lliguin

92508

1-194.1

Response to Comment Letter I-194

Carlos Lliguin July 24, 2024

I-194.1 This comment is Form Letter A. As such, please see Form Letter A Response.

Comment Letter I-195

Eden Vitakis

From:

Jimmy Calanchini <jimmy.calanchini@ucr.edu>

Sent:

Wednesday, July 24, 2024 3:36 PM

To:

Jeffrey Smith

Subject:

I oppose the current draft of the Meridian D1 Gateway Aviation Center Project (SCH

2021040012)

To our policy makers in the Riverside area,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to our community.

Please Consider:

- 1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.
- 2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations.
- 3) The Draft EIR contains multiple numerical errors and omissions, making it difficult for an expert to check its claims.
- 4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base.
- 5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM) during flight.
- 6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise.
- 7) Cargo plane noise can adversely affect the academic performance of our children.

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations

have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase.

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008.

1-195.1

Response to Comment Letter I-195

Jimmy Calanchini July 24, 2024

I-195.1 This comment is Form Letter B. As such, please see Form Letter B Response.

Comment Letter I-196

Eden Vitakis

From:

Kathleen Bocian < kathleen.bocian@gmail.com>

Sent: To: Wednesday, July 24, 2024 2:12 PM Jeffrey Smith; CBFCentury@aol.com

Subject:

Objection to expansion of Cargo Plane Flights

July 22, 2024

smith@marchipa.com, CBFCentury@aol.com

Dear Mr. Smith,

Thank you for the opportunity to submit comments for the Meridian D1 Gateway Aviation Center project (SCH 2021040012). The Draft EIR is inadequate in addressing and mitigating the myriad of negative environmental impacts this project would cause to my community.

Please Consider:

1) Aircraft noise has a negative effect on health: Multiple scientific studies show increased insomnia, substance abuse, and cardiovascular disease.

2) The Draft EIR does not consider noise effects on the residential neighborhoods of Mission Grove, Canyon Crest, Orangecrest, or Woodcrest, and many other neighborhoods, even though these neighborhoods were severely impacted by the 2005-2008 March cargo operations. We live near the Sycamore Canyon Wilderness area. There are many days when we cannot sit outside in our backyard and talk because of the constant airplane noise.

3) The Draft EIR contains multiple numerical errors and omissions, making it impossible for an expert to check its claims. Many of the neighbors this proposal impacts are UCR faculty and staff, community leaders, and persons who direct major law firms, architectural firms and businesses. This disregard for accuracy in your proposal will not 'fly' with this audience and insults our intelligence.

4) March JPA and associated developers have a documented history of misleading claims about the impact of cargo operations on communities surrounding the Air Force Base. Again, for an audience of neighbors who make their living holding people, reporting and experiments accountable, it is foolish to think that you can mislead us.

5) Cargo planes, like passenger planes, emit greenhouse gases (GHGs) such as carbon dioxide (CO2), nitrogen oxides (NOx), and particulate matter (PM)during flight.

6) Climate Change: The GHG emissions from cargo planes contribute to climate change, which has severe consequences, including rising temperatures, more extreme weather events, and sea-level rise. News flash: climate change is no longer considered a 'woke' concern. The extreme weather and wild fires of the past few days have made the immediate threats of climate change very real.

7) Cargo plane noise can adversely affect the academic performance of our children.

I-196.1

I-196.2

I-196.3

I-196.4

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V I-196.9

1

The distinctive bowl-shape of Inland geographies captures pollutants, leading to cardiac, respiratory, and reproductive health impacts as well as cancers. Over the past 22 years, state and federal air quality regulations have progressed with reducing large particulate matter and oxides of nitrogen (NOx) emissions. However, with the recent exponential increase in warehouses in the Inland Empire, decades of effort are becoming undermined as greenhouse gases (GHG) climb, and NOx, particulate matter (PM), and ozone increase. It is ironic that the AQMD has just relocated to a campus adjacent to UCR. It appears that this Meridian Gateway Aviation Project will provide realistic and relevant data.

I-196.9 Cont. I-196.10

We suffered from the noise and pollution from the DHL cargo flights of 2005-2008. This project is ill-conceived and fatally flawed from the start, and the Draft EIR dramatically underestimates the project's negative effects. The Riverside community has a long, historical relationship with March AFB, and we are home to many, many valued veterans. Please consider less environmentally-harmful, community-focused alternatives. Thank you.

I-196.11

Sincerely,

Kathleen Bocian
6308 Glen Aire Ave. Riverside CA 92506
Retired, Research Analyst
Graduate School of Education
University of California, Riverside

--

Kathy Bocian

2

Page 2 of 2 in Comment Letter I-196

Response to Comment Letter I-196

Kathleen Bocian July 24, 2024

- I-196.1 This comment is paragraphs 1–3 of Form Letter B. As such, please see Form Letter B Response.
- I-196.2 This comment describes personal experience with existing aircraft noise near Sycamore Canyon Wilderness Area. The commenter's location is approximately 3.8 miles northwest of the 65 dBA CNEL Baseline + Peak Project aviation noise contours shown in Figure 3.11-12 of the EIR. While flights may be visible and audible under the right conditions, changes to the outdoor ambient noise level exposures (expressed as CNEL) in these off-site areas attributed to Proposed Project aviation traffic are not expected to be significant. The comment does not raise any specific questions, issues, or concerns regarding the adequacy of the environmental analysis in the EIR.
- I-196.3 This comment is paragraph 4 of Form Letter B. As such, please see Form Letter B Response.
- **I-196.4** This comment expresses general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the accuracy of the environmental analysis in the EIR.
- **I-196.5** This comment is paragraph 5 of Form Letter B. As such, please see Form Letter B Response.
- **I-196.6** This comment expresses general opposition to the Proposed Project. The comment does not raise any specific questions, issues, or concerns regarding the accuracy of the environmental analysis in the EIR.
- **I-196.7** This comment is paragraphs 6–7 of Form Letter B. As such, please see Form Letter B Response.
- **I-196.8** This comment raises concerns regarding extreme weather and wildfires related to climate change. The comment does not raise questions, issues, or concerns about the adequacy of the environmental analysis included in the EIR.
- I-196.9 This comment is paragraphs 8-9 of Form Letter B. As such, please see Form Letter B Response.
- **I-196.10** This comment references the relocation of SCAQMD's campus. The comment does not raise questions, issues, or concerns about the environmental analysis included in the EIR.
- **I-196.11** This comment is the first two sentences of paragraph 10 of Form Letter B. As such, please see Form Letter B Response.
- **I-196.12** This is a general comment about the Riverside community. The comment does not raise questions, issues, or concerns about the adequacy of the environmental analysis included in the EIR.
- I-196.13 This comment is the last sentence of paragraph 10 of Form Letter B. As such, please see Form Letter B Response.

Comment Letter I-197

Eden Vitakis

From: Michael Delpit <mdelpit56@gmail.com>

Sent: Sunday, July 28, 2024 8:47 AM

To: Dan Fairbanks; Jeffrey Smith; Cindy Camargo
Subject: No cargo planes/ No Gateway Aviation Project

Hello,

I will be brief. Please do not allow this project to move forward. Everyone is aware of the negative ramifications of this aviation project. As it is, we are surrounded by warehouses while proposals to build more are still on the table. Also, the number of four axle trucks that are breaking the law on a daily basis is inexcusable. If this project is approved, the future of our neighborhoods will certainly be at jeopardy. If approved, this will be the final turning point of the spoilation of our neighborhoods,

1-197.1

Please help us,

Michael Delpit

What measures are in place to ensure the project's compliance with all relevant zoning and land use regulations?	I-159.48
How will the project impact the overall social cohesion and community well-being in the area?	I I-159.49
Are there any plans to address the potential loss of community cohesion and sense of belonging due to the project?	I-159.50
Has the report thoroughly assessed the risk of air and water pollution from the project's operations?	-159.51
Thank you for your attention to these critical issues. I look forward to your response and further discussion on how we can effectively address these concerns.	I-159.52

Sincerely,

Ira Long 951-961-6646 Riverside, 92506

Page 4 of 4 in Comment Letter I-159

Response to Comment Letter I-197

Michael Delpit July 28, 2024

I-197.1 This comment raises general opposition to the Proposed Project. The comment raises no specific issues, questions, or concerns about the analysis in the EIR.

III Errata

The comments received during the public review period for the Draft EIR resulted in clarifications, revisions, and minor editorial corrections to the text of the Draft EIR. These revisions are shown in this chapter and are presented by chapter number, section number, and page number. Sections III.1 and III.2 of this chapter provide general information regarding global edits and changes to figures from the Draft EIR. In Section III.3 of this chapter, individual revisions are presented, with additions shown in <u>double underline</u> and deletions shown in <u>strike through</u> text, to be presented to the March Joint Powers Commission for certification prior to Project approval. Where necessary, introductory paragraphs are provided for the text revisions, all of which are shown after the applicable page numbers from the Draft EIR, with surrounding sentences for context. Where footnotes are reproduced from the Draft EIR, footnote numbers may not match the numbering from the original document, due to being reproduced in a new document. These errata merely clarify facts and correct minor errors and do not constitute "substantial revisions" requiring recirculation of the Draft EIR, as set forth in CEQA Guidelines Section 15073.5.

III.1 Global Edits

Several minor corrections have been made in the Draft EIR that appear numerous times throughout the document. These corrections are described once below and are applicable throughout the Draft EIR.

March JPA References

The March Joint Powers Authority ("March JPA") is a joint powers agency comprised of the County of Riverside, the City of Riverside, the City of Riverside, the City of Perris (collectively, the "Member Agencies") created by a Joint Powers Agreement dated September 7, 1993 to act as the federally recognized reuse authority, redevelopment agency, and airport authority for the former March Air Force Base. Pursuant to Government Code section 6502 and section 1 of the Joint Powers Agreement, as amended, the Member Entities delegated to the March JPA the power and authority to operate and manage the March Inland Port Airport Authority and its civilian airport and having all the rights, powers, and duties related thereto including authority for airport master planning and authority to collect and retain, for airport purposes, any and all lease revenues from airport properties.

In April 2023, the Member Agencies entered into the 14th Amendment to the Joint Powers Agreement, which transferred land use authority of non-airport property to the County of Riverside ("14thAmendment"). Specifically, through operation of the 14th Amendment, post-July 1, 2025, the March Inland Port Airport Authority, a California airport authority, established by the March Joint Powers Commission of the March JPA ("MIPAA") now exercises land use authority over the MIPAA territory as shown in Exhibit B to the 14th Amendment, and retains control over the operations and development of the March Inland Port Airport, including the D-1 Aviation Center Project ("Project") site.

On May 23, 2024, pursuant to the California Environmental Quality Act ("CEQA"), March JPA published a Draft Environmental Impact Report ("EIR") for the Project. The Draft EIR (SCH Number 2021040012) states that the March JPA is the "lead agency" for the Project, but, per the 14th Amendment, as of July 1, 2025, MIPAA (who prior to July 1, 2025 had land use authority and control over development of the March Inland Port Airport as a part of the March JPA) is now the more appropriate lead agency. As such, and consistent with case law, MIPAA is utilizing the environmental documents prepared by March JPA. *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1383

(court held it was proper for the city to utilize the CEQA documents prepared by the county prior to incorporation); see also, State CEQA Guidelines § 15052.

All references in the EIR and appendices to March Joint Powers Authority, March JPA, and MJPA for actions prior to July 1, 2025 remain the same. All references in the EIR and appendices to March Joint Powers Authority, March JPA, and MJPA for actions on or after July 1, 2025 are revised to MIPAA. MIPAA still applies the March JPA General Plan, Development Code and CEQA Guidelines as referenced in the Draft EIR.

Landscape References

Landscaping on the project site will only include hardscape and soil binders; no hydroseed landscaping will be included. Figure 2-9, Landscape Plan, has been revised in the Final EIR to remove proposed vegetation.

Project Summary

To provide clarity throughout the EIR, all references to "a flight" include two flight operations: an arrival and a departure.

In all instances where the following paragraph is included, such as the introduction in the resource sections within Chapter 3.0 Environmental Analysis, the following project summary is replaced to provide further clarity.

As discussed in detail in Chapter 2, Project Description, of this EIR, the Proposed Project consists of two components: the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component involves the development of a gateway air freight cargo center, including taxilane/taxiway and parking improvements, within an approximately 34-acre site within March Inland Port Airport under the jurisdiction of MIPAAMarch JPA. The Off-Site Component of the Proposed Project includes taxiway and other infrastructure improvements within approximately 12 acres of March ARB. Once constructed, the Proposed Project is anticipated to average have a maximum of 17 two-way flights per day, 6 days per week (non-peak). During the peak season (i.e., late November through late December), the Proposed Project is anticipated to average have a maximum of 21 two-way flights per day, 6 days per week, over a 4-week period. Aircraft Flight operations would occur between 7:00 a.m. and 11:00 p.m. (approximately 5% of the proposed aircraft flight operations would occur between 10:00 p.m. and 11:00 p.m.).

Figures Depicting the Site Plan

Several figures in the Draft EIR incorrectly depict a larger aircraft in the southernmost aircraft parking gate. All figures in the EIR should be considered to reflect a fleet consisting of Boeing 767-300 aircraft, which is consistent with the assumptions and analysis included in the Draft EIR (see Section III.2.1, Figure 2-5).

III.2 Figure Edits

III.2.1 Figure 2-5, Site Plan: Air Cargo Center Component

Figure 2-5 in the Draft EIR incorrectly depicted a larger aircraft in the southernmost aircraft parking gate. Figure 2-5 has been revised to reflect a fleet consisting of Boeing 767-300 aircraft, which is consistent with the assumptions and analysis included within the Draft EIR.

III.2.2 Figure 2-6, Cargo Building Elevations

Figure 2-6 from the Draft EIR has been revised to reflect the correct number of dock doors (31) and also maximum height (45 feet) of the proposed cargo building, which is consistent with the assumptions and analysis included in the within the Draft EIR.

III.2.3 Figure 2-9, Landscape Plan

Figure 2-9 from the Draft EIR incorrectly depicted a larger aircraft in the southernmost aircraft parking gate. Figure 2-9 has been revised to reflect a fleet consisting of Boeing 767-300 aircraft, which is consistent with the assumptions and analysis included in the within the Draft EIR. As discussed in Section III.1, Figure 2-9 has been revised to remove all vegetation and depict hardscape and soil binders.

III.2.4 Figure 2-11, Tentative Parcel Map

Figure 2-11, Tentative Parcel Map, has been added to the EIR. As shown in Figure 2-11, the Proposed Project would subdivide an existing 56.33-acre parcel of the D-1 Property to create two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes. The eastern developable parcel would encompass the Air Cargo Component and exclude all of Site 7. The western constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment, and its addition does not change the analysis in the EIR.

III.3 Changes to the Draft EIR

Where necessary, introductory paragraphs are provided for the text revisions, which are shown after the applicable page numbers from the Draft EIR, with surrounding sentences for context. Revisions are presented with additions shown in <u>double underline</u> and deletions shown in <u>strike through</u> text.

III.3.1 Changes to the Executive Summary

III.3.1.1 Section ES.4.1, Project Overview

Page ES-4

As discussed in detail in Chapter 2, Project Description, of this Draft EIR, the Proposed Project consists of two components: the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component involves the development of a gateway air freight cargo center, including taxilane/taxiway and parking improvements, within an approximately 34-acre site within MIP Airport under the jurisdiction of MIPAAMarch JPA. The Off-Site Component of the Proposed Project includes taxiway and other infrastructure improvements within approximately 12 acres of March ARB. Once constructed, the Proposed Project is anticipated to average have a maximum of 17 two-way flights per day, 6 days per week (34 flight operations per day). Each flight includes two flight operations: an arrival and a departure. During the holiday season (i.e., late November through late December), increased aircraft operations the Proposed Project would be anticipated to average 22 have a maximum of 21 flights per day, 6 days per week, resulting in an additional 128 two way flights (256 flight operations) over the 4 week period. The maximum annual flight operations for the Proposed Project, estimated at 10,608 flight

operations, would not exceed the currently available civilian air cargo flight operations annual capacity under the <u>Joint Use Agreement</u>, which is approximately 21,000 flight operations.¹ <u>Aircraft Flight</u> operations would occur between 7:00 a.m. and 11:00 p.m. (approximately 5% of the proposed <u>aircraft flight</u> operations would occur between 10:00 p.m. and 11:00 p.m.).²

III.3.1.2 Section ES.4.3, Project Design Features

NOTE: PDF-TRA-1 has been revised in response to a request by the City of Moreno Valley (See Comment A-6.11 and Response A-6.11, Chapter II, Response to Comments of this Final EIR).

Page ES-5

PDF-TRA-1 Payment of Fair-Share Cost.

- <u>A.</u> To address operational deficiencies at off-site intersections, prior to the issuance of a certificate of occupancy, the Proposed Project shall contribute \$281,498 (with Heacock Street Extension) as its fair share toward the improvement measures provided in Table 1-5, Summary of Improvements and Rough Order of Magnitude Costs with Heacock Street Extension, of the Traffic Analysis (Appendix M-1 to this EIR).
- B. The applicant shall pay a fair-share contribution to the City of Moreno Valley for the pavement maintenance over a 30-year cycle of the following roadway segments:
 - a. Heacock Street from the access roadway to Cactus Avenue.
 - b. Heacock Street from the access roadway to San Michele Road.
 - c. Cactus Avenue from Heacock Street to the western City limits.
 - d. Indian Street from San Michele Road to the southern City limits.
 - e. Perris Boulevard from San Michele Road to the southern City limits.
- C. The applicant agrees to pay an aggregate amount for pavement maintenance described in subsection B up to a maximum of \$324,173.00, which shall be payable in annual installments equal to \$10,805.76.

III.3.1.3 Section ES.6, Required Permits and Approvals

NOTE: In response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project requests approval of a tentative parcel map (See, e.g., Comment A-3.2 and Response A-3.2, Chapter II, Response to Comments of this Final EIR) <u>and ground lease</u>.

Section 1(c) of the Joint Use Agreement.

Day flights would occur between 7:00 a.m. and 7:00 p.m., evening flights would occur from 7:00 p.m. to 10:00 p.m., and night flights would occur from 10:00 p.m. to 11:00 p.m.

Pages ES-5-ES-6

Zoning Designation

The project site has not previously been given a zoning designation; therefore, because the Proposed Project would be consistent with the March General Plan land use designation of Aviation (AV), the applicant is requesting a zoning designation of AV for the approximately 34-acre Air Cargo Center Component.

Tentative Parcel Map

In response to agency concerns regarding potential hazards related to Site 7 and requests for clearer delineation, the Proposed Project requests approval of a tentative parcel map to subdivide an existing 56.33-acre parcel of the D-1 Property to create two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes. The eastern developable parcel would encompass the Air Cargo Component and exclude all of Site 7. The western constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment, and its addition does not change the analysis in the EIR.

Ground Lease

Ground Lease between MIPAA (Landlord) and Meridian Park D-1, LLC (Tenant) under which Landlord would exclusively lease to the Tenant approximately 22.87 acres of March Inland Airport premises, as detailed in the Project Description, together with all easements and appurtenances and Landlord would allow the Tenant, pursuant to the proposed Plot Plans and Tentative Parcel Map analyzed in the EIR, to construct buildings and other improvements.

III.3.1.4 Table ES-1, Summary of Project Impacts

NOTE: For readability, the following mitigation measure changes are presented in the body of the document rather than within the table. Cultural and Tribal Cultural Resources mitigation measures have been revised through Tribal consultation subsequent to the release of the Draft EIR.

Pages ES-18-ES-20

3.4 Cultural Resources, Threshold Cul-2, Mitigation Measure(s)

Archaeological and Tribal Monitoring. Prior to the commencement of ground-disturbing activities issuance of a grading permit, the project applicant shall retain an Archaeological Principal Investigator (Principal Investigator), meeting the Secretary of the Interior's Professional Qualification Standards, a qualified tribal monitor to monitor to oversee monitoring of all mass grading and trenching activities. The Project Archaeologist shall manage and oversee monitoring for all initial ground-disturbing activities and excavation of each portion of the project site including but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition, etc. The Project Archaeologist shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with the Consulting Tribe(s) and MIPAA. The applicant shall secure an agreement with the tribe (or tribes)

for tribal monitoring. The applicant shall submit a copy of a signed contract between the tribe (or tribes) and the landowner/applicant for the monitoring of the Proposed Project to March Air Reserve Base (ARB) and the March Joint Powers Authority (JPA) Planning Director. The applicant shall provide a minimum of 30 days' advance notice to the tribe (or tribes) of all mass grading and trenching activities.

- MM-CUL-2 CRMTP. Prior to the <u>start</u> commencement of ground-disturbing activities, the <u>Proposed</u> Project's qualified archaeological Principal Investigator (Principal Investigator), meeting the Secretary of the Interior's Professional Qualification Standards, in consultation with the <u>Consulting Tribe(s)</u>tribe, March ARB, <u>MIPAAMarch JPA</u>, and the construction manager, shall develop a Cultural Resource Monitoring and Treatment Plan (CRMTP). The CRMTP shall define the process to be followed upon discovery of cultural resources to ensure the proper treatment, evaluation, and management of cultural resources within the project site, should they be encountered during construction.
 - A. For purposes of CRMTP implementation, the project area subject to monitoring is defined as <u>follows</u>:
 - All areas within the project site boundary specifically in which ground-disturbing activities (e.g., including, but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition) will occur are subject to monitoring.
 - 2. Any on-site or off-site ancillary Proposed Project use areas or facility locations are subject to the protocols outlined in the CRMTP. These include, but are not limited to, access roadways, yards/support areas, easements, staging areas, and utility tie-ins.
 - B. The following shall be included in the CRMTP:
 - 1. Project description and location
 - 2. Project grading and development scheduling
 - 3. Roles and responsibilities of individuals on the Project
 - 4. The pre-grading meeting and Cultural Resources Worker Sensitivity Training (MM-CUL-3) details
 - 5. The protocols and stipulations that the contractor, MIPAA, Consulting Tribe(s), and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation (MM-CUL-4, MM-TCR-2)
 - 6. <u>The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items</u>
 - 7. Contact information of relevant individuals for the Proposed Project.
- <u>MM-CUL-3</u> <u>Cultural Resources Worker Sensitivity Training.</u> The CRMTP shall include a requirement for all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities. The Training shall be conducted by a qualified archaeologist (Project Archaeologist) <u>and representatives of the Consulting Tribe(s)</u>. The Training shall provide (1) the types and characteristics of cultural materials that may be identified during construction and an explanation of the importance of and legal basis for the protection of significant cultural resources; (2) proper procedures to follow in the event that cultural resources

or human remains are uncovered during ground-disturbing activities, including procedures for work curtailment or redirection; and (3) protocols for contacting the site supervisor and archaeological and tribal monitor upon discovery of a cultural resources or human remains. All new construction personnel must take the Training prior to beginning ground-disturbing activities.

Inadvertent Discovery of Archaeological Resources. In the event that cultural resources are inadvertently unearthed during excavation and grading activities for the Proposed Project, all earth-disturbing activities within a 100-foot radius of the area of the discovery shall cease and the Project Archaeologist shall notify March Air Reserve Base (ARB), March Inland Port Airport Authority (MIPAA), and the Consulting Tribe(s). The Project Archaeologist, in consultation with the Tribes, will evaluate the significance of the find and determine the appropriate course of action. Authorization to resume construction shall be given by March ARB and MIPAA only after an action plan has been agreed to and it has been fulfilled. The action plan shall include implementation of all appropriate measures to protect any possible archaeological resources. Treatment of tribal cultural resources inadvertently discovered during the Project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.

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

- 1. The Project Archaeologist and the tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition, etc. The Project Archaeologist and the tribal monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with March JPA.
- 2. If, during ground disturbing activities, potential cultural resources are inadvertently discovered, the Project Archaeologist and tribal monitor(s) shall immediately redirect grading operations in a 100 foot radius around the discovery and the following procedures shall be followed:
- A. All ground-disturbance disturbing activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the <u>project</u> applicant, <u>the Project Archaeologist</u>, the <u>Tribal Representative(s)</u>, and <u>MIPAA the Principal Investigator</u>, the <u>tribal representative(s)</u>, the <u>Project Archaeologist and tribal monitors</u>, and the <u>Planning Director</u> to discuss the significance of the find <u>pursuant to California Public Resources Code (PRC) Section 21083.2.</u>
- B. At the meeting, the significance of the <u>discovery discoveries</u> shall be discussed and after consultation with <u>the Tribal Representative(s)</u> and the <u>Project Archaeologist</u> the <u>Principal Investigator</u>, the tribal representative(s), the <u>Project Archaeologist</u>, and tribal monitors, a decision shall be made, with the concurrence of the <u>MIPAA Planning Director</u>, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources.
- C. Grading or fEurther ground disturbance, including but not limited to grading, trenching, etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional tribal monitors if needed.

- d. Treatment and disposition of the inadvertently discovered cultural resources shall be carried out in one or more of the following methods:
- D. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property, so they are not subject to further disturbance in perpetuity as identified in MM-TCR-4 (Non-Disclosure).
- E. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archaeologist, in consultation with the Tribe, and shall be submitted to MIPAA for review and approval prior to implementation of said plan.
- F. Pursuant to PRC <u>California Public Resources Code</u> Section 21083.2(b), avoidance is the preferred method of preservation for <u>archaeological resources and</u> cultural resources.
 - ii. During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the Project Archaeologist. If removal of artifacts from the project site is necessary, each artifact shall be cataloged, and an inventory will be provided to the tribal monitor upon each addition. No recordation of sacred items is permitted without the written consent of the tribe.
 - iii. Following the completion of the Proposed Project, the applicant shall relinquish ownership of all cultural resources that have been determined to be of Native American origin to the tribe.

If the landowner and the tribe the project applicant and the Tribe(s) cannot come to a consensus agree on the significance of, or the mitigation for the Native American archaeological or cultural resources, these issues will be presented to the Planning Director MIPAA for decision. The Planning Director MIPAA shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources and the recommendations of the Project Archaeologist archaeological Principal Investigator and shall consider the cultural and religious principles and practices of the tribe. Notwithstanding any other rights available under the law, the decision of the MIPAA Planning Director shall be appealable to the March Joint Powers Commission JPA.

G. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to MIPAA upon the completion of a treatment plan and final report detailing the significance and treatment finding.

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

Regardless of discovery, at the completion of all ground disturbing activities, the Project Archaeologist shall prepare a Monitoring Report and submit it to March ARB; March JPA; the Eastern Information Center located at the University of California, Riverside; and the designated tribal government. The Monitoring Report will document all monitoring efforts and be completed within 60 days of conclusion of all ground disturbing activities.

Phase IV Report. Prior to final inspection, the Project Archaeologist shall submit two copies of the Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. MIPAA shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the MIPAA Director shall clear this condition. Once the report(s) are determined to be adequate, two copies shall be submitted to the South Coastal Information Center at San Diego State University and one copy shall be submitted to the Pechanga Cultural Resources Department.

MM-CUL-2 Inadvertent Discovery of Archaeological Resources. In the event that archaeological resources are inadvertently unearthed during excavation and grading activities for the Proposed Project, the contractor shall cease all earth disturbing activities within a 100 foot radius of the area of the discovery and notify March Air Reserve Base (ARB) and March Joint Powers Authority (JPA). The Project Archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall evaluate the significance of the find and determine the appropriate course of action. Authorization to resume construction shall be given by March ARB and March JPA only after consultation with the qualified archaeologist and shall include implementation of all appropriate measures to protect any possible archaeological resources.

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3.4 Cultural Resources, Threshold Cul-3, Mitigation Measure(s)

MM-CUL-3 Inadvertent Discovery of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the project contractor shall immediately halt work and contact the Riverside County Coroner to evaluate the discovery. The contractor shall also notify March Air Reserve Base (ARB) and March Joint Powers Authority (JPA). No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, NAHC shall immediately notify those persons it believes to be the most likely descendants (MLDs) of the deceased Native American. The MLDs shall complete their inspection within 48 hours of being granted access to the site. The MLDs shall then determine. in consultation with the property owner or their representative, the disposition of the human remains. Authorization to resume construction shall be given by March ARB and March JPA only after consultation with the MLDs and shall include implementation of all appropriate measures to protect any possible burial sites and/or human remains.

See MM-TCR-3.

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3.4 Cultural Resources, Cumulative, Mitigation Measure(s)

See MM-CUL-1 through MM-CUL-35 and MM-TCR-3.

Page ES-22

NOTE: In response to comments received from March ARB, MM-HAZ-1 has been revised to include March ARB's review of the HMCP prior to grading (See Comment A-7.15, Response A-7.15, Chapter II, Response to Comments, of this Final EIR).

3.8 Hazards and Hazardous Materials, Threshold HAZ-1, Mitigation Measure(s)

MM-HAZ-1 Hazardous Materials Contingency Plan. Prior to issuance of a grading permit, the project applicant shall submit to March JPA MIPAA and March ARB for review and approval a hazardous materials contingency plan (HMCP) that addresses the potential impacts to soil, soil vapor, and groundwater beneath the project site to ensure the health and safety of construction workers and future occupants of the industrial uses on the site. The HMCP shall include procedures for assessment, characterization, handling, transportation, and disposal of potentially contaminated soils and soil vapor, including metals, PAHs, petroleum hydrocarbons and PFAS in soil, and TCE in soil vapor. Contaminated soils shall be managed and disposed of in accordance with federal, state, and local regulations, and in accordance with the rules of the receiving landfill. The HMCP shall be submitted to U.S. Environmental Protection Agency Region IX and the state (California Department of Toxic Substances Control and the Santa Ana Regional Water Quality Control Board) for review of the protective measures during work within Site 7, which is under an Environmental Restrictive Covenant. The HMCP shall include health and safety measures for handling contaminated soils and working in potentially contaminated soil vapor, including procedures for soil vapor and breathing zone monitoring in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166, and control of fugitive dust emissions in accordance with SCAQMD Rules 1403 and 1466. The HMCP shall be implemented at all times during excavation, grading, and construction activities, or other activities that could disturb or be impacted by site soils or

Pages ES-25-ES-26

soil vapors.

NOTE: MM-TRA-2 has been revised in response to a request by the City of Moreno Valley (See Comment A-6.10 and Response A-6.110 Chapter II, Response to Comments of this Final EIR).

3.12 Transportation, TRA-1, Mitigation Measure(s)

MM-TRA-2 Project Truck Route on Heacock Street. The project applicant shall ensure that all leasing agreements for the Proposed Project require that all Proposed Project truck traffic utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. The intersection improvements at Heacock Street shall include installed signage directing trucks to the Harley Knox Boulevard interchange. Prior to issuance of a certificate of occupancy, a traffic management plan shall be submitted to MIPAA and the City of Moreno Valley to manage and identify potential hazards associated with the Proposed Project within the City of Moreno Valley. Initial drive counts (to include vehicle classification) shall be provided to the City of Moreno Valley within one (1) year of occupancy and thereafter every three (3) years for up to ten (10) years from occupancy.

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3.13 Tribal Cultural Resources, Threshold TCR-1(i), Mitigation Measure(s)

N/A

- MM-TCR-1 Tribal Monitoring. Prior to issuance of a grading permit, the project applicant shall retain a qualified tribal monitor to monitor all initial ground-disturbing activities, including, but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition. The applicant shall secure an agreement with the Tribe (or Tribes) for tribal monitoring. The applicant shall submit a copy of a signed contract between the Tribe (or Tribes) and the landowner/applicant for the monitoring of the Proposed Project to March Air Reserve Base (ARB) and the March Inland Port Airport Authority (MIPAA) Director. The applicant shall provide a minimum of 30 days' advance notice to the Tribe (or Tribes) of all mass grading and trenching activities. The tribal monitor(s) shall oversee monitoring for all initial ground-disturbing activities and excavation of each portion of the project site, including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition, etc. The tribal monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with the Project Archaeologist and MIPAA.
- MM-TCR-2 Final Disposition. In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:
 - A. One or more of the following treatments, in order of preference, shall be employed with the Tribes. Evidence of such shall be provided to MIPAA:
 - Preservation in place of the cultural resources, if feasible. Preservation in place means
 avoiding the resources, leaving them in the place where they were found with no
 development affecting the integrity of the resources.
 - 2. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with MIPAA under a confidential cover and not subject to Public Records Request.
 - 3. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources, ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the

landowner to MIPAA. There shall be no destructive or invasive testing on sacred items, burial goods, or Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to MIPAA upon the completion of a treatment plan and final report detailing the significance and treatment finding.

MM-TCR-3

Discovery of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the project contractor shall immediately halt work and contact the Riverside County Coroner to evaluate the discovery. The contractor shall also notify March Air Reserve Base (ARB) and March Inland Port Airport Authority (MIPAA). No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, NAHC shall immediately notify those persons it believes to be the most likely descendants (MLDs) of the deceased Native American. The MLDs shall complete their inspection within 48 hours of being granted access to the site. The MLDs shall then determine, in consultation with the property owner or their representative, the disposition of the human remains. Authorization to resume construction shall be given by March ARB and MIPAA

See also MM-CUL-1 and MM-CUL-3.

3.13 Tribal Cultural Resources, Threshold TCR-1(i), Level of Significance after Mitigation

Less than significant with mitigation incorporated

3.13 Tribal Cultural Resources, Threshold TCR-1(il), Mitigation Measure(s)

to protect any possible burial sites and/or human remains.

See MM-CUL-1.

MM-TCR-4

Non-Disclosure. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and lead agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.

only after consultation with the MLDs and shall include implementation of all appropriate measures

See also MM-TCR-1, MM-TCR-2, MM-TCR-3, and MM-CUL-3.

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3.13 Tribal Cultural Resources, Cumulative, Mitigation Measure(s)

See MM-TCR-1, MM-CUL-1, MM-TCR-2, MM-TCR-3, MM-CUL-3, and MM-TCR-4 MM-CUL 1.

III.3.1.5 Section ES.10.1 Alternatives Evaluated

Page ES-29

This Draft EIR includes an evaluation of the following alternatives:

- Alternative 1: No Project
- Alternative 2: Nighttime Flight Noise Reduction
- Alternative 3: Reduced Flight Operations
- Alternative 4: Private Aircraft Services
- Alternative 5: Reduced Operation/No Nighttime Flights
- Alternative 6: Reduced Aviation Noise

Page ES-30

Once operational, Alternative 4 would accommodate private aircraft, rather than commercial aircraft, in contrast to the Proposed Project. In addition, because there would be no air cargo facility constructed under this alternative, no air cargo would be transported to or from the project site, eliminating the movement of goods-distribution trucks to and from the project site. However, personal vehicle trips would be added for passengers of the private aircraft, and the anticipated number of employees would be 52, resulting in a reduction of employees compared to the Proposed Project. Annual flights under Alternative 4 would remain the same as the Proposed Project; however, flight operations would not occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations).

Alternative 5: Reduced Operation/No Nighttime Flights Alternative

Under Alternative 5, the Reduced Operation/No Nighttime Flights Alternative, buildout of the project site would occur in an identical manner to the Proposed Project. Thus, Alternative 5 would result in the development of the Air Cargo Center Component and the Off-Site Component, as discussed in Chapter 2, Project Description. The cargo building and all proposed taxiway and aircraft parking apron improvements, utility improvements, landscaping, and internal driveways/parking lots, as well as the work within the right-of-way along Heacock Street, would be constructed in the exact same manner as the Proposed Project. In addition, all off-site work planned under the Proposed Project, including the work to be completed in Work Areas 1–5, would occur under this alternative.

The operational aspects of the cargo building would remain the same as those identified for the Proposed Project. However, under Alternative 5, annual flight operations would be reduced by 10%, resulting in total annual operations of 9,548 flight operations. Additionally, under Alternative 5, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Thus, flight operations under Alternative 5 would occur only from 7:00 a.m. to 10:00 p.m. Operation of the air cargo center would similarly be reduced by 10%.

Alternative 6 - Reduced Aviation Noise Alternative

Under Alternative 6, the Reduced Aviation Noise Alternative, buildout of the project site would occur in an identical manner to the Proposed Project. Thus, Alternative 6 would result in the development of the Air Cargo Center Component and the Off-Site Component, as discussed in Chapter 2, Project Description. The cargo building and all proposed taxiway and aircraft parking apron improvements, utility improvements, landscaping, and internal driveways/parking lots, as well as the work within the right-of-way along Heacock Street, would be constructed in the exact same manner as the Proposed Project. In addition, all off-site work planned under the Proposed Project, including the work to be completed in Work Areas 1–5, would occur under this alternative.

The operational aspects of the cargo building would remain the same as those identified for the Proposed Project. However, under Alternative 6, annual flight operations would be reduced by approximately 30%, resulting in total annual operations of 7,488 flight operations. Flight operations would occur between 7:00 a.m. and 10:00 p.m. Alternative 6 restricts a higher percentage of flight operations to daytime hours (7:00 a.m. to 7:00 p.m.) than the Project. Additionally, under Alternative 6, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Alternative 6 forgoes the Proposed Project's non-peak/peak flight distribution. Alternative 6 is anticipated to have a maximum of 12 flights per day, 6 days a week. Operation of the air cargo center would similarly be reduced by approximately 30%.

III.3.1.6 Section ES.10.2, Environmentally Superior Alternative

Pages ES-30-ES-32

Table ES-2 provides a summary of the alternatives impact analysis considered in the EIR, identifies the areas of potential environmental effects per CEQA, and ranks each alternative as better than, the same as, or worse than the Proposed Project with respect to each issue area.

Table ES-2. Comparison of Impacts from the Proposed Project and Alternatives

Environmental Topic	Proposed Project	Alternative 1: No Project	Alternative 2: Nighttime Flight Noise Reduction	Alternative 3: Reduced Flight Operations	Alternative 4: Private Aircraft Services	Alternative 5: Reduced Operation/ No Nighttime Flights	Alternative 6: Reduced Aviation Noise
Aesthetics	LTS	▼	▼	▼	▼	<u></u>	<u></u>
		No impact	LTS	LTS	LTS	<u>LTS</u>	<u>LTS</u>
Air Quality	SUI	▼	=	▼	▼	<u></u>	<u></u>
	(operational VOC, NOx, CO)	No impact	SUI	SUI	LTS	<u>SUI</u>	<u>SUI</u>
Biological	LTS + mitigation	▼	=	=	=	<u>=</u>	=
Resources		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation
Cultural Resources	LTS + mitigation	▼	=	=	=	<u>=</u>	=
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation
Energy	LTS	▼	=	▼	▼	<u></u>	<u></u>
		No impact	LTS	LTS	LTS	<u>LTS</u>	<u>LTS</u>
Geology and Soils	LTS + mitigation	▼	=	=	=	=	=
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation
Greenhouse Gas	LTS + mitigation	▼	=	▼	▼	<u></u>	<u></u>
Emissions		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	LTS + mitigation
Hazards/Hazardous	LTS + mitigation	▼	=	▼	▼	<u>▼</u>	<u></u>
Materials		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>
Hydrology/Water	LTS + mitigation	▼	=	=	=	=	=
Quality		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>
Land Use/Planning	LTS + mitigation	▼	=	=	=	=	=
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	<u>LTS + mitigation</u>
Noise	SUI	▼	▼	▼	▼	<u></u>	<u></u>
	(aviation noise)	No impact	SUI	SUI	LTS	<u>SUI</u>	LTS + mitigation
Transportation	LTS + mitigation	▼	=	▼	▼	<u></u>	<u></u>
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	<u>LTS + mitigation</u>

Table ES-2. Comparison of Impacts from the Proposed Project and Alternatives

Environmental Topic	Proposed Project	Alternative 1: No Project	Alternative 2: Nighttime Flight Noise Reduction	Alternative 3: Reduced Flight Operations	Alternative 4: Private Aircraft Services	Alternative 5: Reduced Operation/ No Nighttime Flights	Alternative 6: Reduced Aviation Noise
Tribal Cultural	LTS + mitigation	▼	=	=	=	.	=
Resources		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation
Utilities/Service	LTS	▼	=	▼	▼	<u>▼</u>	<u></u>
Systems		No impact	LTS	LTS	LTS	<u>LTS</u>	<u>LTS</u>

Notes: LTS = less than significant; SUI = significant and unavoidable; LTS + mitigation = less than significant with mitigation incorporated.

Green = No impact or less than significant; Yellow = less than significant with mitigation incorporated; Red = significant and unavoidable.

[▲] Impacts would be greater than those of the Proposed Project.

⁼ Impacts would be comparable to those of the Proposed Project.

[▼] Impacts would be reduced compared to those of the Proposed Project.

III.3.2 Changes to Chapter 1, Introduction

III.3.2.1 Section 1.1, Purpose and Scope

Page 1-2

To facilitate approval of the Proposed Project, the following would be required:

- Zoning Designation. The project site has not previously been assigned a zoning designation; therefore, to be consistent with the current March JPA General Plan land use designation of Aviation (AV), the proposed project is requesting a zoning designation of Aviation (AV) for the approximately 34-acre Air Cargo Center Component.
- Plot Plan. Concurrent with the requested zoning designation, a Plot Plan Application would be submitted to allow construction of the following within MIPAAMarch JPA jurisdiction:
 - An approximately 180,800-square-foot cargo building with 9 grade-level loading doors and 31 dock positions, a parking apron sufficient to support commercial cargo airplanes, 37 trailer storage positions, and 122 stalls for employee parking
 - An expansion of the existing taxiways/tarmac
 - Construction of stormwater facilities, including an underground detention basin
 - Expansion of the existing access roadway and a signalized entrance onto Heacock Street
- Tentative Parcel Map. The Proposed Project requests approval of a tentative parcel map to subdivide an existing 56.33-acre parcel of the D 1 Property to create two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes. The eastern developable parcel would encompass the Air Cargo Component and exclude all of Site 7. The western constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment, and its addition does not change the analysis in the EIR.
- Ground Lease. Ground Lease between MIPAA (Landlord) and Meridian Park D-1, LLC (Tenant) under which Landlord would exclusively lease to the Tenant approximately 22.87 acres of March Inland Airport premises, as detailed in the Project Description, together with all easements and appurtenances and Landlord would allow the Tenant, pursuant to the proposed Plot Plans and Tentative Parcel Map analyzed in the EIR, to construct buildings and other improvements.

III.3.2.2 Section 1.2.1, Format

Page 1-3

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

- A-1: Notice of Preparation
- A-2: Initial Study
- A-3: NOP Comments
- B-1: Air Quality Report

- M-1: Traffic Analysis
- M-2: Vehicle Miles Traveled Analyses
- M-2A: VMT Analysis
- M-2B: VMT Alternatives Analysis

- B-2: Opening Year Emissions Memo
- C-1: Health Risk Assessment Report
- C-2: Amicus Curiae Briefs
- D: Biological Technical Report
- E: Historic Properties Report
- F: Energy Analysis Report
- G: GHG Emissions Analysis Report
- H: Geotechnical Exploration Report
- I: Paleontological Resources Report
- J-1: Phase I Environmental Site Assessment
- J-2: NETR Environmental Lien Report
- J-3: Wildlife Hazard Review
- K-1: Preliminary Hydrology Study
- K-2: Project-Specific Water Quality Management Plan
- L-1: Noise Impact Analysis Report
- L-2: Noise Technical Report (Sleep Disturbance)
- L-3: Outdoor Ambient Sound Survey Location L5

- N-1: EMWD/WMWD Interagency Agreement for Intertie to Serve March ARB
- N-2: MARB Water Master Plan
- N-3: Conceptual Site Plans
- N-4: WMWD Water Supply and Sewer Will-Serve Letter
- N-5: EMWD Sewer Capacity Study
- N-6: Correspondence with WMWD
- N-7: WMWD Conditions of Approval for Proposed Project
- O: Fuel Farm Letter
- P: Meridian D-1 Project Aviation CNEL Scenarios
- Q: Regional Air Cargo Capacity Overview
- R: Riverside County ALUC Consistency Finding Letter
- S-1: Alternative 3 AQ/GHG/Energy/HRA Analysis
- S-2: Alternative 4 AQ/GHG/Energy/HRA Analysis
- S-3: Alternative 6 AQ/GHG/Energy Analysis

III.3.3 Changes to Chapter 2, Project Description

III.3.3.1 Section 2.2, Project Background

NOTE: The following discussion and Table 3.11, Annual Airfield Operations at March ARB, from Section 3.11, Noise, Section 3.11, Existing Conditions, is now also included in Section 2.2, Project Background, for informational purposes. Note that because the added text includes a table, to avoid renumbering the subsequent tables in Chapter 2 this table has been numbered "2-A."

Page 2-3

On May 7, 1997, DAF and March JPA entered into a Joint Use Agreement to designate March ARB as a joint use airport (March JPA and DAF 1997). DAF defines a "joint use airport" as one where facilities that are owned and operated by DAF are made available for use by civil aviation. The Joint Use Agreement was amended by Amendment 1 on February 21, 2001, and by Amendment 2 on June 20, 2008. Amendments 1 and 2 changed certain conditions for civil aircraft operations and the type of civil aircraft operations authorized at March ARB under the Joint Use Agreement. A new Joint Use Agreement was established on March 14, 2014. The 2014 Joint Use Agreement assigned all of March JPA's rights and interest under the 1997 Joint Use Agreement to the MIP Airport Authority (MIPAA and DAF 2014). The Joint Use Agreement resulted in a lease for more than 350 acres and established the civilian airport that has since been named March Inland Port (MIP) Airport (MIPAA and DAF 2014). Under the agreement, March JPA and the military entities share essential aviation facilities, such as the control towers and runways, as well as maintenance of facilities. The MIP Airport is the civilian facility that is managed and operated

by the MIP Airport Authority. A land use map depicting the boundaries of March ARB and MIP Airport is shown on Figure 2-4, March Inland Port Airport Boundaries.

Civilian and military entities share essential facilities, and the existing aircraft noise levels include both military and civilian flights. In January 2024, DAF released the Revised Draft KC-46A Main Operating Base 5 (MOB 5) Beddown Environmental Impact Statement (Draft KC-46A EIS), which evaluates the replacement of the KC-135 aircraft with the KC-46A aircraft at March ARB (DAF 2024). The Draft KC-46A EIS provided information regarding existing military and civilian flight operations, as shown in Table 2-A. As identified in the Draft KC-46A EIS, civilian flights compose approximately 18% of the total flight operations at March ARB.

Table 2-A. Annual Airfield Operations at March ARB

<u>Aircraft</u>	<u>Total Flight Operations</u>
Military	
<u>KC-135</u>	<u>5,367</u>
<u>C-17</u>	<u>8,961</u>
<u>F-16C</u>	<u>1,980</u>
<u>MQ-9</u>	<u>2,272</u>
King Air 350	<u>832</u>
<u>AS-350</u>	<u>275</u>
Military transient	<u>2,939</u>
Civilian	
All civilian	<u>4,972</u>
Total Military and Civilian Flight Operations	<u>27,598</u>

III.3.3.2 Section 2.4.1.1, Air Cargo Component

Page 2-5

Landscaping and Fencing

The Proposed Project would include landscaped hardscaped areas at the project site entrance from the access roadway and on small islands in the two employee parking lots (Figure 2-9, Landscape Plan) that would be compatible with FAA regulations, as well as the Wildlife Hazard Review prepared for the Proposed Project (Appendix J-3), for landscaping in flight paths. Any proposed landscaping would exceed the minimum setback requirements. Landscaping would include two areas of non native hydroseed totaling 137,381 square feet (refer to Figure 2-9, Landscape Plan). As required by Chapter 9.17 of the March JPA Development Code (March JPA 2016) and the recommendations in the Wildlife Hazard Review prepared for the Proposed Project, the native hydroseed mix would consist of a drought tolerant native grass and forb mix, specifically small fescue (Festuca microstachys). Along the project site's northern boundary, a 14-foot-high fence compliant with Department of Defense regulations and requirements would be installed. Along the project site's southern boundary and along the site access roadway, a

Beddown is a military term that references the execution of a base action, such as establishing a unit on Air Force real property for longer than 1 year (U.S. Air Force 2020).

10-foot-tall tube steel fence would be installed. A 12-foot-tall concrete masonry unit wall would be installed in the interior of the site to separate Site 7 from areas within the project site accessible to trucks and employees.

III.3.3.3 Section 2.4.2, Project Operations

Page 2-6

Once constructed, the Proposed Project is anticipated to average-have a maximum of 17 flights per day, 6 days a week (non-peak), as shown in Table 2-1. Each flight includes two flight operations: an arrival and a departure. Generally, arrivals would occur in the early morning hours and departures would occur in the late evening hours. Arriving aircraft would approach from the southeast on Runway 32, over non-residential land uses. During the peak season (i.e., late November through late December), the Proposed Project is anticipated to average have a maximum of 21 22 flights per day, 6 days per week, over a 4-week period. However, the maximum annual aircraft flight operations for the Proposed Project, estimated at 10,608 flight operations, would not exceed the currently available civilian air cargo flight operations annual capacity under the Joint Use Agreement, which is 21,000 flight operations.⁴ Aircraft-Flight operations would occur between 7:00 a.m. and 11:00 p.m. (approximately 5% of Proposed Project's proposed aircraft flight operations would occur between 10:00 p.m. and 11:00 p.m.).5 The Proposed Project increased flight operations under the Proposed Project would require one additional traffic controller. Because there is no proposed tenant at this time, the proposed flight operations scenarios reflect a fleet consisting of Boeing 767-300 aircraft, which is a typical plane utilized in air cargo operations. As a condition of approval, prior to issuance of a certificate of occupancy, analysis of the ultimate tenant's aircraft fleet mix (i.e., emissions, fueling requirements, noise) shall be reviewed by MIPAAMarch JPA for conformance with this EIR; non-conformance may require additional CEQA review.

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NOTE: Table 2-1 is replaced in its entirety with the following.

Table 2-1. Proposed Aircraft Project Flight Operations

Maximum Daily Operatio	<u>ns</u>	Total Maximum Daily Flight Operations ^a	<u>Total Maximum Daily</u> <u>Flightsa</u>
Non-Peak Season			
<u>Arrivals</u>		<u>17</u>	<u>17</u>
<u>Day</u>	<u>14</u>		
<u>Evening</u>	<u>3</u>		
<u>Night</u>	<u>0</u>		
<u>Departures</u>		<u>17</u>	
<u>Day</u>	<u>3</u>		
<u>Evening</u>	<u>12</u>		
<u>Night</u>	<u>2</u> b		
Peak Season			
<u>Arrivals</u>		<u>21</u>	<u>21</u>

Section 1(c) of the Joint Use Agreement

Day <u>flight</u> operations would occur between 7:00 a.m. and 7:00 p.m., evening <u>flight</u> operations would occur from 7:00 p.m. to 10:00 p.m., and night <u>flight</u> operations would occur from 10:00 p.m. to 11:00 p.m.

Table 2-1. Proposed Aircraft Project Flight Operations

Maximum Daily Operatio	<u>ns</u>	Total Maximum Daily Flight Operations ^a	Total Maximum Daily Flights ^a
<u>Day</u>	<u>15</u>		
<u>Evening</u>	<u>7</u>		
<u>Night</u>	<u>0</u>		
<u>Departures</u>		<u>21</u>	
<u>Day</u>	<u>6</u>		
<u>Evening</u>	<u>13</u>		
<u>Night</u>	2		

Notes: day = 7:00 a.m.-7:00 p.m.; evening = 7:00 p.m.-10:00 p.m.; night = 10:00 p.m.-11:00 p.m.

Page 2-7

Upon arrival, the air freight cargo would be transferred from the planes to the cargo building, where the air cargo would be placed onto trucks and conveyed to distribution centers; this process would also occur in reverse, from a distribution center to the cargo building. The cargo building would serve as a passthrough for air freight cargo; therefore, there would be no storage, including cold storage. The cargo building would provide an area for mobile maintenance equipment for planes and trucks. All maintenance activities would occur within the proposed tarmac areas on the project site. A portable wash rack for ground support and maintenance equipment would be available in the cargo building. Water from the wash rack would be routed through a grease removal/trap system inside the cargo building before discharging to the sanitary sewer. In the event that emergency maintenance is needed, the cargo building would have the capability to provide service for a plane.⁴ It is anticipated the Proposed Project would employ up to 150 individuals.

Page 2-9

Table 2-2. Construction Schedule

Phase Name	Start Date	End Date	Days
Site preparation, including demolition	06/01/2025	06/23/2025	17
Grading	07/01/2025	08/15/2025	32
Building construction	08/01/2025	02/28/2026	152
Paving	12/01/202 <u>5</u> 6	01/30/2026	43
Architectural coating	02/15/2026	03/30/2026	32

III.3.3.4 Section 2.4.4, Project Design Features

NOTE: PDF-TRA-1 has been revised in response to a request by the City of Moreno Valley (See Comment A-6.11 and Response A-6.11, Chapter II, Response to Comments of this Final EIR).

Each flight includes two operations: an arrival and a departure.

This represents an overstatement of the maximum daily nighttime aircraft operations during non-peak hours, which is approximately 1.6 aircraft operations.

Pages 2-10 and 2-11

PDF-TRA-1 Payment of Fair-Share Cost.

- <u>A.</u> To address operational deficiencies at off-site intersections, prior to the issuance of a certificate of occupancy, the Proposed Project shall contribute \$281,498 (with Heacock Street Extension) as its fair share toward the improvement measures provided in Table 1-5, Summary of Improvements and Rough Order of Magnitude Costs with Heacock Street Extension, of the Traffic Analysis (Appendix M-1 to this EIR).
- B. The applicant shall pay a fair-share contribution to the City of Moreno Valley for the pavement maintenance over a 30-year cycle of the following roadway segments:
 - a. Heacock Street from the access roadway to Cactus Avenue.
 - b. Heacock Street from the access roadway to San Michele Road.
 - c. Cactus Avenue from Heacock Street to the western City limits.
 - d. Indian Street from San Michele Road to the southern City limits.
 - e. Perris Boulevard from San Michele Road to the southern City limits.
- C. The applicant agrees to pay an aggregate amount for pavement maintenance described in subsection B up to a maximum of \$324,173.00, which shall be payable in annual installments equal to \$10,805.76.

III.3.3.5 Section 2.6.1, Requested Approvals and Entitlements

Page 2-12

- Tentative Parcel Map: The Proposed Project requests approval of a tentative parcel map to subdivide an existing 56.33-acre parcel of the D 1 Property to create two parcels (one developable parcel and one constrained parcel) and a lettered lot for access and utility purposes. The eastern developable parcel would encompass the Air Cargo Component and exclude all of Site 7. The western constrained parcel, which fronts Heacock Street, would encompass part of Site 7, including the former fire training and disposal/burn pit areas. The parcel map will have no physical effect on the environment, and its addition does not change the analysis in the EIR.
- Ground Lease. Ground Lease between MIPAA (Landlord) and Meridian Park D-1, LLC (Tenant) under which Landlord would exclusively lease to the Tenant approximately 22.87 acres of March Inland Airport premises, as detailed in the Project Description, together with all easements and appurtenances and Landlord would allow the Tenant, pursuant to the proposed Plot Plans and Tentative Parcel Map analyzed in the EIR, to construct buildings and other improvements.

III.3.3.6 Section 2.6.2, Other Discretionary Actions

NOTE: Table 2-4 has been revised in response to the Riverside County ALUC Consistency Finding with the March ARB/Inland Port Airport Land Use Compatibility Plan on March 13, 2025 (Appendix R to the Final EIR). Because the Proposed Project was found to be consistent, it is no longer an outstanding discretionary action.

Pages 2-11 and 2-12

Table 2-4. Permits, Approvals, and Discretionary Actions of Other Federal, State, and Local Agencies

Agency	Permit
Federal	
Federal Aviation Administration	Approval of Environmental Assessment prepared per the National Environmental Policy Act; approval of the Airport Layout Plan update
Department of the Air Force	Approval of Environmental Assessment prepared per the National Environmental Policy Act
U.S. Army Corps of Engineers	Clean Water Act Section 404 Nationwide Permit
March Air Reserve Base	Approval of the tarmac expansion and necessary easements for Work Areas 1–5
State or Regional	
State Water Resources Control Board	National Pollutant Discharge Elimination System Construction General Permit, which would include a stormwater pollution prevention plan
California Department of Fish and Wildlife	California Fish and Game Code Section 1600 Streambed Alteration Agreement
California Department of Toxic Substances Control	Notification prior to construction for (1) approval of the project under the Environmental Restrictive Covenant and (2) approval of the hazardous materials contingency plan
Regional Water Quality Control Board, Santa Ana Region	401 Water Quality Certification or a Waste Discharge Requirement Permit (401 needed if a U.S. Army Corps of Engineers Section 404 Nationwide Permit is needed)
Local	
Riverside County Airport Land Use Commission	Consistency finding with the March Air Reserve Base/ Inland Port Airport Land Use Compatibility Plan
City of Moreno Valley	A traffic control plan if Project construction restricts traffic on Heacock Street and permits for road closures

III.3.4 Changes to Chapter 3, Environmental Analysis

III.3.4.1 Section 3.2, Air Quality

Section 3.2.2, Relevant Plans, Policies, and Ordinances

Pages 3.2-13 and 3.2-14

NOTE: Table 3.2-3 in the Draft EIR has been revised to reflect the revised NAAQS primary annual arithmetic mean for PM_{2.5}.

Table 3.2-3. Ambient Air Quality Standards

		CAAOCa	NAAOCh		
		CAAQS ^a	NAAQSb		
Pollutant	Averaging Time	Concentration ^c	Primary ^{c,d}	Secondary ^{c,e}	
03	1 hour	0.09 ppm (180 μg/m³)	_	Same as primary	
	8 hours	0.070 ppm (137 μg/m ³)	0.070 ppm (137 μg/m³) ^f	standard ^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/m ³)	35 ppm (40 mg/m ³)	None	
	8 hours	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m ³)		
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	_	
PM_{10}^{i}	24 hours	50 μg/m³	150 μg/m³	Same as primary	
	Annual arithmetic mean	20 μg/m ³	_	standard	
PM _{2.5} i	24 hours	_	35 μg/m³	Same as primary standard	
	Annual arithmetic mean ^j	12 μg/m³	12.0 μg/m³ 9.0 μg/m³	15.0 μg/m ³	
Lead ^{j,k}	30-day average	1.5 μg/m ³	_	_	
	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/m ³)	_	_	
Vinyl chloride ^j	24 hours	0.01 ppm (26 μg/m³)	_	_	
Sulfates	24 hours	25 μg/m³	_	_	
Visibility reducing particles	8 hours (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: CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; $O_3 = ozone; \mu g/m^3 = micrograms$ per cubic meter; ppm = parts per million by volume; $NO_2 = microgen$ dioxide; CO = carbon monoxide; $mg/m^3 = milligrams$ per cubic meter; $SO_2 = microgen$ dioxide; $PM_{10} = microgen$ di

- a CAAQS for O₃, CO, SO₂ (1-hour and 24-hour), NO₂, and suspended particulate matter (PM₁₀, 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 17 CCR 70200.
- NAAQS (other than O₃, NO₂, SO₂, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O₃ 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 PM₁₀, 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 1. 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 (77 °F) 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 Primary NAAQS: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- e Secondary NAAQS: 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 O₃ were lowered from 0.075 ppm to 0.070 ppm
- To attain the 1-hour NAAQS, 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 1-hour NAAQS is in units of ppb. CAAQS are in units of parts per million (ppm). To directly compare the 1-hour NAAQS to the CAAQS, the units can be converted from ppb to ppm. In this case, the NAAQS of 100 ppb is identical to 0.100 ppm.
- On June 2, 2010, a new 1-hour SO2 NAAQS was established and the existing 24-hour and annual primary NAAQS were revoked. To attain the 1-hour NAAQS, 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 SO2 NAAQS (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 NAAQS, except that in areas designated nonattainment of the 1971 NAAQS, the 1971 NAAQS remain in effect until implementation plans to attain or maintain the 2010 NAAQS are approved.
- Effective May 6, 2024, the annual PM_{2.5} standard was reduced to 9.0 μg/m³ (89 FR 16202-16404). On December 14, 2012, the annual PM_{2.5} primary NAAQS was lowered from 15 μg/m³ to 12.0 μg/m³. The existing 24-hour PM_{2.5} NAAQS (primary and secondary) were retained at 35 μg/m³, as was the annual secondary NAAQS of 15 μg/m³. The existing 24-hour PM₁₀ NAAQS (primary and secondary) of 150 μg/m³ also were retained. The form of the annual primary and secondary NAAQS is the annual mean, averaged over 3 years.
- ¹ CARB has identified lead and vinyl chloride as toxic air contaminants (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.
- The NAAQS for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead NAAQS (1.5 μg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 NAAQS, except that in areas designated nonattainment for the 1978 NAAQS, the 1978 NAAQS remains in effect until implementation plans to attain or maintain the 2008 NAAQS are approved.

Section 3.2.4, Impacts Analysis; Threshold AQ-2

NOTE: Table 3.2-12 in the Draft EIR omitted the SO_x emissions from aircraft sources but were disclosed in Appendix B-1. Table 3.2-12 has been revised to show the total SO_x emissions. Notably, the emissions still would not exceed the SCAQMD thresholds of significance.

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Table 3.2-12. Summary of Proposed Project Operational Emissions - Peak Season (4 Weeks - Winter)

	Emissions (Pounds per Day)					
Source	VOCs	NO _x	СО	SO _x	PM ₁₀	PM _{2.5}
Mobile source	11.22	62.80	132.80	0.76	19.60	4.49
Area source ^a	9.64	0.00	0.00	0.00	0.00	0.00
Energy source	0.10	1.86	1.56	0.02	0.14	0.14

Table 3.2-12. Summary of Proposed Project Operational Emissions - Peak Season (4 Weeks - Winter)

	Emissions (Pounds per Day)					
Source	VOCs	NO _x	СО	SO _x	PM ₁₀	PM _{2.5}
On-site equipment source	0.23	0.75	32.89	0.00	0.06	0.05
Aircraft source	194.34	617.00	811.02	0.00 <u>45.98</u>	6.44	6.38
Total Maximum Daily Emissions	215.53	682.42	978.27	0.78 <u>46.76</u>	26.24	11.06
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No

Source: Appendix B-1.

Notes: VOCs = volatile organic compounds; NO_x = oxides of nitrogen; CO = carbon monoxide; SO_x = sulfur oxides; PM_{10} = coarse particulate matter; $PM_{2.5}$ = fine particulate matter; SCAQMD = South Coast Air Quality Management District.

Peak values are based on winter emissions estimates.

Operational emissions were modeled based on an opening year of 2024 and would decrease with a later opening year. See Meridian D-1 Gateway Aviation Center Opening Year Emissions Comparison Memorandum, Appendix B-2.

Section 3.2.8, References Cited

NOTE: Because a new table note added to Table 3.2-3 included a new parenthetical reference, an entry has been added to the references cited list as shown below.

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89 FR 16202–16406. Final rule: "Reconsideration of the National Ambient Air Quality Standards for Particulate Matter." March 6, 2024. https://www.federalregister.gov/documents/2024/03/06/2024-02637/reconsideration-of-the-national-ambient-air-quality-standards-for-particulate-matter.

III.3.4.2 Section 3.3, Biological Resources

Section 3.3.1, Existing Conditions

NOTE: There was a typographical error as there is no FW WW-3 – the EIR text applies to FW WW-2 (See EIR Table 3.3-4, Figure 3.3-2, Appendix D).

Subheading "Wetland Waters of the United States"

Page 3.32-14

FW WW-2 is composed of two disturbed, seasonally inundated depression areas primarily within a dirt access road and a swale near the central portion of the project site directly southeast of Swale (S) 2 (described further below). FW WW-32 did not display an observable OHWM or bed and bank, instead displaying drainage patterns and surface

Based on CalEEMod defaults, it is assumed that landscape maintenance equipment would not be used in the winter. It should be noted that the Proposed Project would use hardscape landscaping, and the use of landscaping equipment would likely be minimal.

soil cracks indicative of ponding within a depressional area, as well as a dark layer of a biotic crust. Wetland delineation data were collected within FW WW-32 to confirm the presence or absence of wetland parameters. FW WW-32 met the hydrophytic vegetation, hydric soil, and wetland hydrology parameters. This feature was dominated by short woollyheads (FACW) and smallseed sandmat (*Euphorbia polycarpa*; not listed/obligate upland [NL/UPL]). This feature is depicted on Figure 3.3-2.

III.3.4.3 Section 3.4, Cultural Resources

In response to comments received from Pechanga Band of Indians and Soboba Band of Luiseño Indians, the following changes have been made to the Cultural Resources section of the EIR.

3.4 Cultural Resources

This section describes the existing cultural and historical setting of the proposed Meridian D-1 Gateway Aviation Center Project (Proposed Project) site (project site) and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the Proposed Project. The following reference was used in the preparation of this section of the Draft-Environmental Impact Report (EIR):

 Identification and Evaluation of Historic Properties Gateway Aviation Center Project, March Air Reserve Base (ARB), Moreno Valley Area, Riverside County, California (Historic Properties Report), by CRM TECH in September 2020, included as Appendix E of this EIR.

The purpose of the Historic Properties Report is to provide the March <u>Inland Port Airport Joint Powers</u> Authority (<u>MIPAAJPA</u>) with the necessary information and analysis to determine whether the undertaking would have an effect on any historical resources, as defined by 14 CCR 15064.5(a)(1)–(3), or historic properties, as defined by 36 CFR 800.16(I), that may exist in the area of potential effects (APE). The research methods utilized by CRM TECH to identify such resources included a historical/archaeological resources records search, historical and geoarchaeological background research, contacting Native American representatives, and an intensive-level field survey within the APE and vicinity. The geographic extent of these research methods is further defined in Section 3.4.1, Existing Conditions. Other sources consulted are listed in Section 3.4.8, References Cited.

As discussed in detail in Chapter 2, Project Description, of this EIR, the Proposed Project consists of two components: the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component involves the development of a gateway air freight cargo center, including taxilane/taxiway and parking improvements, within an approximately 34-acre site within March Inland Port Airport under the jurisdiction of MIPAAMarch JPA. The Off-Site Component of the Proposed Project includes taxiway and other infrastructure improvements within approximately 12 acres of March ARB. Once constructed, the Proposed Project would average have a maximum of 17 two-way flights per day, 6 days per week (non-peak). During the peak season (i.e., late November through late December), the Proposed Project would average have a maximum of 2122 two-way flights per day, 6 days per week, over a 4-week period. Aircraft Flight operations would occur between 7:00 a.m. and 11:00 p.m. (approximately 5% of the proposed aircraft flight operations would occur between 10:00 p.m. and 11:00 p.m.).

3.4.1 Existing Conditions

Defining the Area of Potential Effects

The APE is the geographic area within the boundaries of which impacts are anticipated. The APE analyzed in the Historic Properties Report (Appendix E) is bounded roughly by Heacock Street on the east, the March ARB Fire Department facility on the north, Taxiways A and G on the west, and an industrial warehouse and an air cargo center on the south, as shown in Figure 3.4-1, Area of Potential Effects for Cultural Resources. The APE consists of mostly undeveloped and currently unused land that is relatively level, with a gradual decline to the southeast. Most of the APE features open fields covered by dense, low-lying ruderal grasses and weeds,⁶ although some areas have been cleared of vegetation. Existing development on the project site consists of two well extraction facilities, a former (now vacant) fire house constructed between 1978 and 1994, a paved taxiway and tarmac area associated with aviation uses, and various paved improvements located next to the existing taxiway. The topsoil generally consists of fine- to medium-grained clayey loam, reddish brown in color and mixed with some small rocks.

Eastern Information Center Records Search

The Historic Properties Report documents the results of a California Historical Resources Information System (CHRIS) search conducted at the Eastern Information Center, and a search of the Native American Heritage Commission (NAHC) Sacred Lands File.

CRM TECH completed a CHRIS search at the Eastern Information Center for the APE and the surrounding area within a 1-mile radius on June 8, 2020 (Appendix E). This search included mapped prehistoric, historical, and built-environment resources and properties designated as California Historical Landmarks, Points of Historical Interest, or Riverside County Landmarks. Additional consulted sources included the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and the California Historical Resources Inventory.

Records Search Results

The Eastern Information Center records search for the APE and surrounding area indicated that 31 technical studies have been previously conducted within 1 mile of the APE from the mid-1990s through 2016 that collectively cover roughly 70% of the land within the records search scope, mostly within the boundaries of March ARB. Of these 31 studies, 4 partially or entirely overlap the APE. Of these 4 overlapping studies, 3 were large-scale studies conducted on the entire area of the former March ARB in preparation for its realignment in the mid-1990s. The most recent study among the 4, which was completed in 2016, did not include the westernmost portion of the current APE. During that study, a drainage channel lying within the APE was recorded in the California Historical Resources Inventory and designated as Site 33-024853. As a result of the records search, in addition to Site 33-024853 within the APE, 9 additional historical/archaeological sites and 1 isolate (i.e., a locality with fewer than 3 artifacts) were identified within 1 mile of the APE.

The previously recorded resources are historical in age and consist of the Atchison, Topeka, and Santa Fe Railway; two flood-control channels; structural remains from the World War II-era Camp Haan; and refuse deposits. Several of the sites were remains of facilities at March ARB. Other than Site 33-024853, all recorded resources were found

[&]quot;Ruderal" describes plant species that thrive in disturbed lands.

at least 0.5 miles from the APE. Therefore, none of them required further consideration during the preparation of the Historic Properties Report.

Geoarchaeological Analysis

CRM TECH conducted a geoarchaeological analysis to assess the potential for the deposition and preservation of subsurface cultural deposits from the prehistoric period within the APE. Sources consulted for this analysis included primary topographic, geologic, and soil maps pertaining to the APE and surrounding area (Appendix E). The surface geology in the APE has been mapped as Qal, or alluvium of recent (Holocene) age (Rogers 1965). More recently, however, the area has been mapped as Qvofa, or very old alluvial fan deposits of early Pleistocene age (Morton 2001, 2003; Morton and Cox 2001; Morton and Matti 2001; Morton and Miller 2006). The deposition of the surface sediments in the APE predate the earliest human occupation in the region. The APE is located on an alluvial fan subject to occasional flooding but is nearly 10 miles from any relatively steady streams and would not have provided a favorable setting for permanent or long-term habitation by the aboriginal population during prehistoric times. Instead, the area was likely used as a travel route and for opportunistic subsistence activities, where surviving cultural remains are typically limited to the ground surface and shallow deposits (Appendix E).

Native American Coordination

Ethnographic Setting

According to current ethnohistorical scholarship, the traditional territories of several Native American groups, including the Luiseño, the Serrano, the Gabrieleño, and the Cahuilla, overlapped one another in the present-day Riverside–San Bernardino region during the Late Prehistoric Period. However, the Moreno Valley area is generally recognized as a part of the traditional homeland of the Luiseño, a Takic-speaking people whose territory extended from present-day Riverside to Escondido and Oceanside. The name of the group derived from Mission San Luis Rey, which held jurisdiction over most of the traditional Luiseño territory during the late eighteenth and early nineteenth centuries (Appendix E; Bean and Shipek 1978).

Anthropologists have divided the Luiseño into several autonomous lineages or kin groups, which represented the basic political unit among most Native Americans in Southern California. Each Luiseño lineage possessed a permanent base camp, or village, on the valley floor and another in the mountain regions for acorn collection. Luiseño villages were made up of family members and relatives, the chiefs inherited their positions, and each village owned its own land. Villages were usually located in sheltered canyons or near year-round sources of fresh water, always near subsistence resources (Appendix E; Bean and Shipek 1978).

The Luiseño exploited nearly all resources of the environment in a highly developed seasonal mobility system. Primarily hunters and gatherers, they collected seeds, roots, wild berries, acorns, wild grapes, strawberries, wild onions, and prickly pear cacti, and hunted deer, elks, antelopes, rabbits, wood rats, and a variety of insects. Bows and arrows, atlatls or spear throwers, rabbit sticks, traps, nets, clubs, and slings were the main hunting tools. Each lineage had exclusive hunting and gathering rights in their procurement ranges. These boundaries were respected and only crossed with permission (Appendix E; Bean and Shipek 1978).

The traditional Cahuilla territory included most of central Southern California. The territory was bounded by the San Bernardino Mountains to the north, Borrego Springs and the Chocolate Mountains to the south, the Colorado Desert to the east, the San Jacinto Plain to the west, and the Palomar Mountains to the east. The Cahuilla are subdivided into three geographical divisions: the Mountain Cahuilla, Western Cahuilla, and Desert Cahuilla. The Mountain

Cahuilla and Western Cahuilla lived closest to the current project site (Kroeber 1925). The distinctions between the Mountain Cahuilla, Western Cahuilla, and Desert Cahuilla are believed to be largely geographic, although linguistic and cultural differences may have existed to varying degrees (Strong 1929). The Cahuilla were divided into two moieties named tūktum (Wildcats) and istam (Coyotes) (Strong 1929; Bean 1972).

It is estimated that when Spanish colonization of Alta California began in 1769, the Luiseño had approximately 50 active villages with an average population of 200 individuals each (making the total population approximately 10,000), although other estimates place the total Luiseño population at 4,000–5,000. Some of the villages were forcibly moved to the Spanish missions, while others were left largely intact. Ultimately, Luiseño population declined rapidly after European contact because of diseases such as smallpox, as well as harsh living conditions at the missions and later on the Mexican ranchos, where the native people often worked as seasonal ranch hands (Appendix E; Bean and Shipek 1978).

After the annexation of Alta California by the United States, the large number of non-native settlers further eroded the foundation of traditional Luiseño society. During the latter half of the nineteenth century, almost all remaining Luiseño villages were displaced, their occupants eventually removed to the various reservations. Today, the nearest Native American groups of Luiseño heritage live on the Soboba, Pechanga, and Pala Indian Reservations.

Sacred Lands File Search and Tribal Outreach

CRM TECH requested a search of the Sacred Lands File from the California NAHC for the Proposed Project's APE on April 21, 2020. In response to CRM TECH's inquiry, NAHC reported that the Sacred Lands File search yielded negative results for Native American cultural resources in the APE, although NAHC did note that the absence of specific information does not indicate the absence of cultural resources and recommended that local Native American groups be contacted for further information. NAHC provided a list of potential contacts in the region for that purpose. Following NAHC's recommendations and previously established consultation protocol, CRM TECH contacted eight tribal representatives in the region for additional information on potential Native American cultural resources in or near the APE. The written requests for comments were sent to the tribal representatives via both U.S. mail and email on May 1, 2020, and follow-up telephone solicitations were carried out from May 15 through May 22, 2020. This coordination was conducted for informational purposes only and does not constitute formal government-to-government consultation as specified by Assembly Bill (AB) 52. For some of the tribes, the designated spokespersons on cultural resources issues were contacted in lieu of the individuals suggested by NAHC, as recommended previously by the tribal government staff. Five responses (four written, and one by telephone) were received as a result of the tribal outreach letters; these are summarized in Table 3.4-1.

Table 3.4-1. Native American Tribal Communications

Contact Person/Native American Tribe	Response Received (Method)
Mercedes Estrada, Tribal Administrative Assistant, Santa Rosa Band of Cahuilla Indians	No comments regarding the Proposed Project (telephone).
Denisa Torres, Cultural Resources Manager, Morongo Band of Mission Indians	The tribe noted the presence of prehistoric bedrock milling features within a 5-mile radius of the APE but did not make a specific request or recommendation (email).
Bobby Ray Esparza, Cultural Coordinator, Cahuilla Band of Indians	The tribe requested that ground-disturbing activities in the APE be monitored by a representative of the Cahuilla Band (email).

Table 3.4-1. Native American Tribal Communications

Contact Person/Native American Tribe	Response Received (Method)
Cheryl Madrigal, Tribal Historic Preservation Officer, Rincon Band of Luiseño Indians	The tribe stated that they had no knowledge of any cultural resources in the APE and requested to review the results of the historical/archaeological resources records search (email).
Joseph Ontiveros, Tribal Historic Preservation Officer, Soboba Band of Luiseño Indians	The tribe reported that multiple areas of potential impact were identified during an in-house database search and requested further consultation with March JPA and FAA. Furthermore, the tribe requested that ground-disturbing activities in the APE be monitored by a representative of the Soboba Band (email).
Ray Chapparosa, Chairperson, Los Coyotes Band of Cahuilla and Cupeño Indians	No response.
Molly Earp-Escobar, Cultural Planning Specialist, Pechanga Band of Luiseño Indians	No response.
John Gomez Jr., Cultural Resource Coordinator, Ramona Band of Cahuilla Indians	No response.

Note: APE = area of potential effects; JPA = Joint Powers Authority; FAA = Federal Aviation Administration.

Assembly Bill 52 Consultation

The Proposed Project is subject to compliance with AB 52 (California Public Resources Code [PRC] Section 21074), which requires consideration of impacts to tribal cultural resources (TCRs) and that the lead agency notify California Native American tribal representatives (who have requested notification) who are traditionally or culturally affiliated with the geographic area of the project site. All NAHC-listed California Native American tribal representatives who have requested project notification pursuant to AB 52 were sent letters by March JPA on August 19, 2020 (see Table 3.4-2). The letters contained a project description, an outline of AB 52 timing, a request for consultation, and contact information for the appropriate lead agency representative. The request for tribal consultation window under AB 52 closed on September 18, 2020.

Responses providing a formal request to begin consultation were received by March JPA staff on August 28, 2020, from the Pechanga Band of Luiseño Indians; September 3, 2020, from the Rincon Band of Luiseño Indians; September 17, 2020, from the Agua Caliente Band of Cahuilla Indians; and October 6, 2020, from the Soboba Band of Luiseño Indians. On August 20, 2020, March JPA staff received a response from the Quechan Tribe of the Fort Yuma Reservation, stating that the tribe had no comments and would defer to the more local tribes. On August 19, 2020, March JPA staff received a response from the San Manuel Band of Mission Indians, stating that the tribe had no concerns over implementation of the Proposed Project. The tribe provided a list of mitigation measures/conditions of approval in their response and requested that the language be included as part of the Proposed Project. No other responses were received. Documents related to AB 52 consultation are on file with MIPAA.

Table 3.4-2. Assembly Bill 52 NAHC-Listed Native American Contacts

Native American Tribal Representative	<u>Tribe</u>
Jeff Grubbe, Chairperson	Agua Caliente Band of Cahuilla Indians
Amanda Vance, Chairperson	Augustine Band of Cahuilla Mission Indians
Doug Welmas, Chairperson	Cabazon Band of Mission Indians

Table 3.4-2. Assembly Bill 52 NAHC-Listed Native American Contacts

Native American Tribal Representative	<u>Tribe</u>
Daniel Salgado, Chairperson	Cahuilla Band of Indians
Ralph Goff, Chairperson	Campo Band of Mission Indians
Robert Pinot, Chairperson	Ewiiaapaayp Tribal Office
Michael Garcia, Vice Chairperson	Ewiiaapaayp Tribal Office
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians-Kizh Nation
Anthony Morales, Chairperson	Gabrieleño-Tongva San Gabriel Band of Mission Indians
Sandonne Goad, Chairperson	Gabrieleño-Tongva Nation
Robert Dorame, Chairperson	Gabrieleño-Tongva Indians California Tribal Council
<u>Charles Alvarez</u>	Gabrieleño-Tongva Tribe
Matias Belardes, Chairperson	<u>Juaneño Band of Mission Indians Acjachemen</u> <u>Nation-Belardes</u>
Javaughn Miller, Tribal	La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson	La Posta Band of Mission Indians
Shane Chapparosa, Chairperson	Los Coyotes Band of Mission Indians
Angela Elliott Santos, Chairperson	Manzanita Band of Kumeyaay Nation
Michael Linton, Chairperson	Mesa Grande Band of Diegueño Mission Indians
Robert Martin, Chairperson	Morongo Band of Mission Indians
Mark Macarro, Chairperson	Pechanga Band of Luiseño Indians
Jill McCormick, Historic Preservation Officer	Quechan Tribe of the Fort Yuma Reservation
Joseph Hamilton, Chairperson	Ramona Band of Cahuilla Mission Indians
Bo Mazzetti, Chairperson	Rincon Band of Luiseño Indians
Cheryl Madrigal, Tribal Historic Preservation Officer	Rincon Band of Luiseño Indians
Jessica Mauck, Director of Cultural Resources	San Manuel Band of Mission Indians
Steven Estrada, Chairperson	Santa Rosa Band of Mission Indians
Scott Cozart, Chairperson	Soboba Band of Luiseño Indians
Cody J. Martinez, Chairperson	Sycuan Band of the Kumeyaay
Thomas Tortez, Chairperson	Torres-Martinez Desert Cahuilla Indians

Note: NAHC = Native American Heritage Commission.

Historical Resources Research and Field Survey

Research

CRM TECH reviewed published literature in local and regional history, archival records of the U.S. Bureau of Land Management and the County of Riverside, U.S. General Land Office land survey plat maps dated 1856, U.S. Geological Survey topographic maps dated 1901–1980, and aerial photographs taken in 1966–2018 to understand the development of the APE and surrounding area. The geographic extent of the surrounding area, for purposes of the historical research, included an approximately 3- to 4-mile radius around the APE (refer to Appendix E, Figures 6 and 7). Historical sources consulted during this study yielded no evidence of any settlement or development activities in or near the APE before the present-day March ARB expanded to this area during World War II (Appendix E).

In the 1850s through the 1890s, the only built features known to be present in the APE and surrounding area were crisscrossing roads, including one that ran northwest–southeast across the eastern portion of the APE. The military base was originally built by the U.S. Army in 1918 as Alessandro Aviation Field, but it was renamed March Field later that year. Although it is not shown in maps published during World War II, by the 1930s March Field occupied a roughly 0.8-by-0.8-mile area in and around what is now the March Field Historic District on March ARB (Appendix E).

During 1941–1942, the U.S. government acquired several hundred acres of adjacent land and doubled the size of March Field in preparation for its wartime service as a bomber crew training facility that hosted as many as 75,000 troops. The name of the base was changed to March Army Air Field in 1941, March Army Air Base in 1942, March Air Force Base in 1947, and finally March Air Reserve Base in 1996 (Appendix E).

Among the existing features in the APE, Taxiway A, running northeast to southwest along the northwestern project site boundary, was known to be extant by the early 1950s, evidently a result of the 1940s expansion (Appendix E). Taxiway G, running northwest to southeast along the southwestern project site boundary, and the associated apron were both constructed between 1953 and 1966. The drainage channel recorded in 2016 as Site 33-024853 was also present by 1966. Because the channel drains into Lateral B of the Perris Valley Storm Drain, which was built by the Riverside County Flood Control District in 1955, the earthen channel in the APE likely also dates to the mid-1950s (Appendix E). Since the 1960s, no major changes have been observed in the land use or other characteristics of the APE despite the construction of the nearby warehouses between 1997 and 2005 and the fire station constructed between 1978 and 1994 (NETR 2020).

Juan Bautista de Anza National Historic Trail

In 1775–1776, Juan Bautista de Anza led a Spanish expedition from Mexico to San Francisco with the goal of establishing a mission and presidio in San Francisco (March JPA 1999, p. 5-11; DAF 1996, p. 3-143). A portion of the route traveled by this party crossed what is now the northeast corner of March ARB. In 1990, de Anza's route was designated by the National Park Service as a National Historic Trail under the National Trails System Act (March JPA 1999, p. 5-11). There is no evidence the National Historic Trail is present within the APE.

Development History of March ARB

The Historic Properties Report prepared by CRM TECH (Appendix E, pp. 7, 12–13) describes the history of March ARB as follows:

The Moreno Valley area remained unclaimed public land until 1870, when a 13,471-acre tract was purchased from the U.S. government in a single transaction (BLM n.d.). It was on this vast acquisition that the 11,560-acre Alessandro Tract and the town of Alessandro, which is occupied by March ARB today, were laid out and offered to settlers in 1887 during a land boom that swept through southern California in the 1880s (Gunther 1984:11). After this initial development scheme failed, the developers of Redlands in San Bernardino County, fresh from their acclaimed success in creating the Bear Valley reservoir and the thriving Redlands colony, took over the Alessandro Tract with the intention of irrigating the land with an elaborate water system (ibid.)....

In the vicinity of the APE, in contrast, the establishment of the U.S. Army's Alessandro Aviation Field in 1918 began a long history of military installations, a tradition that was reinforced by the WWII-era Camp Haan and carried to the present time by March ARB. In more recent times, the area around

March ARB has undergone a gradual transition to an industrial/commercial park, largely because of its convenient location in close proximity to the Interstate Highway 215 corridor....

Historical sources consulted during this study yielded no evidence of any settlement or development activities in or near the APE before the forerunner of present-day March ARB expanded to this area during World War II. In the 1850s and the 1890s, the only man-made features known to be present in the immediate project vicinity were a number of crisscrossing roads, including one that traversed northwest-southeast across the eastern portion of the APE (Figs. 6, 7). As mentioned above, the base was originally built by the U.S. Army in 1918 as Alessandro Aviation Field but was renamed March Field later that year (Gunther 1984:13; 310). Although not shown in maps published during WWII, by the 1930s March Field occupied a roughly 0.8×0.8-mile area in and around what is now the March Field Historic District on March ARB (Figs. 8, 9).

Located some ¾ mile to the south of the original March Field, the APE remained undeveloped land that did not appear to be under any use at that time (Fig. 9). In 1941–1942, the U.S. government acquired several hundred acres of adjacent land and doubled the size of March Field in preparation for its wartime service as a bomber crew training facility that hosted as many as 75,000 troops (County of Riverside 1937–1948; March ARB n.d.). The name of the base was changed to March Army Air Field in 1941, March Army Air Base in 1942, March Air Force Base in 1947, and finally March ARB in 1996 (Gunther 1984:310; March ARB n.d.).

Field Survey

CRM TECH conducted a pedestrian field survey of the APE on June 23, 2020. The June 2020 survey was completed by one CRM TECH field director and one CRM TECH archaeologist walking a series of parallel north–south and northeast–southwest transects at 15-meter (approximately 50-foot) intervals. The surveyors systematically surveyed for any evidence of human activities dating to the prehistoric or historic period. Ground visibility was variable, ranging from poor (nearly 0%) in open fields with dense vegetation to excellent (100%) where the ground surface had been cleared. In light of past ground disturbances in the APE, the ground visibility was considered adequate for the survey and for completion of the Historic Properties Report (Appendix E).

No cultural historic-era resources were identified within the APE as a result of the CHRIS records search, Native American outreach, or intensive pedestrian survey, with the exception of Site 33-024853 (Drainage Channel), CRM TECH 3611-1H, and CRM TECH 3611-2H (Taxiways A and G) (Appendix E). These three sites were evaluated against the criteria for listing in the NRHP and none were found to be eligible for the NRHP.

Archaeological Resources Research and Field Survey

CRM TECH conducted a field survey of the APE on June 23, 2020, for archaeological resources. Additionally, a CHRIS records search was conducted for the APE and a 1-mile buffer around the APE. An NAHC Sacred Lands File search and tribal outreach were also conducted. No archaeological resources were identified within the APE as a result of the CHRIS records search, Sacred Lands File search, Native American outreach, or field survey (Appendix E).

3.4.2 Relevant Plans, Policies, and Ordinances

Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq.), authorized the NRHP. Overseen by the National Park Service under the U.S. Department of the Interior, the NRHP is the United States' official list of districts, sites, buildings, structures, and objects worthy of preservation. Its listings encompass all National Historic Landmarks and historic areas administered by the National Park Service.

NRHP guidelines for the evaluation of historic significance were developed to be flexible and to recognize the accomplishments of all who have made significant contributions to the nation's history and heritage. Its criteria are designed to guide federal agencies, state and local governments, and others in evaluating potential entries in the NRHP. For a property to be listed in or determined eligible for listing in the NRHP, it must be demonstrated to possess integrity and to meet at least one of the following criteria (NPS 1997):

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

Integrity is defined in the NRHP guidance as "the ability of a property to convey its significance. To be listed in the NRHP, a property must not only be shown to be significant under the NRHP criteria, but it also must have integrity" (NPS 1997). Historic properties either retain integrity (convey their significance) or they do not. Within the concept of integrity, the NRHP criteria recognize seven aspects or qualities that define integrity: location, setting, design, materials, workmanship, feeling, and association. To retain historic integrity, "a property will always possess several, and usually most, of the aspects" (NPS 1997).

The NRHP guidance further requires that properties be completed at least 50 years ago to be considered for eligibility. Properties completed less than 50 years before evaluation must be proven to be "exceptionally important" (criteria consideration G of the NRHP guidance) to be considered for listing (NPS 1997).

Under Section 106 of the National Historic Preservation Act, a historic property is defined as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties that are of traditional religious and cultural importance to a Native American tribe or Native Hawaiian organization and that meet the NRHP criteria (36 CFR 800.16[I][1]).

Impacts on historic properties under Section 106 of the National Historic Preservation Act are defined in the assessment of impacts (or adverse effects) in 36 CFR 800.5(a):

- (1) An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.
- (2) Adverse effects on historic properties are clearly defined and include, but are not limited to:
 - (i) Physical destruction of or damage to all or part of the property;
 - (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines;
 - (iii) Removal of the property from its historic location;
 - (iv) Change of the character of the property's use or of physical features within the property's setting that contributes to its historic significance;
 - (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
 - (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
 - (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

To comply with Section 106, the criteria of adverse impact are applied to historic properties, if any exist in an APE, pursuant to 36 CFR 800.5(a)(1). If no historic properties are identified in an APE, a finding of "no historic properties affected" will be made. If there are historic properties in an APE, application of the criteria of adverse effect will result in action-related findings of either "no adverse effect" or "adverse effect." A finding of no adverse effect may be appropriate when the undertaking's effects do not meet the thresholds in criteria of adverse effect found in 36 CFR 800.5(a)(1), in certain cases when the undertaking is modified to avoid or lessen effects, or if conditions are imposed to ensure review of rehabilitation plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (codified in 36 CFR Part 68).

State

California Register of Historical Resources

In California, the term "historical resource" includes "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies,

private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). According to PRC Section 5024.1(c), a resource may be listed as a historical resource in the CRHR if it meets at least one of the following criteria:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- (2) Is associated with the lives of persons important in our past.
- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric- and historic-era resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are California Historical Landmarks from No. 770 onward, California Points of Historical Interest designated after January 1998, and resources recommended by the State Historical Resources Commission. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98

California law protects Native American burials, skeletal remains, and associated grave goods regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code (H&SC) Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains can occur until the County Coroner has examined the remains (H&SC Section 7050.5[b]). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the Coroner determines or has reason to believe the remains are those of a Native American, the Coroner must contact NAHC within 24 hours (H&SC Section 7050.5[c]). NAHC will notify the most likely descendant (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The inspection must be completed within 48 hours of being granted access to the site. The MLD may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

Assembly Bill 52

The California Environmental Quality Act (CEQA) requires an assessment of impacts associated with the direct or indirect destruction of a historic resource, a unique archaeological resource, or a TCR or site with cultural value to a California Native American tribe. AB 52 amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 was to include California Native American tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as TCRs. PRC

Section 21074(a)(1) and (2) defines *TCRs* as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe" that are either included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources, or a resource that is determined to be a TCR by a lead agency in its discretion and as supported by substantial evidence.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact or tribal representatives of California Native American tribes that are traditionally and culturally affiliated with the geographic area of a site (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1[b]). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification, and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1[d] and 21080.3.1[e]).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary, the significance of TCRs, the significance of a project's impacts on TCRs, project alternatives or appropriate measures for preservation, and mitigation measures. Consultation is considered concluded when either (1) the parties agree to measures to mitigate or avoid an adverse effect, if an adverse effect exists, on a TCR, or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2[b]).

If a California Native American tribe has requested consultation pursuant to PRC Section 21080.3.1 and has failed to provide comments to the lead agency or otherwise failed to engage in the consultation process, or if the lead agency has complied with PRC Section 21080.3.1(d) and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an environmental document (PRC Section 21082.3[d][2] and [3]).

PRC Section 21082.3(c)(1) states that any information, including the location, description, and use of TCRs, that is submitted by a California Native American tribe during the environmental review process must not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information must be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Local

March JPA General Plan

The Resource Management Element of the March JPA General Plan defines cultural and historical resources as those consisting of historic structures and facilities, archaeological resources, and paleontological resources. The Resource Management Element states that cultural resources are limited, are often-non-renewable, and need to be carefully preserved and managed.

The goal and policies relevant to cultural resources and the Proposed Project from the Resource Management Element are described below (March JPA 1999):

- Goal 1: Promote cultural awareness through preservation of the planning area's historic, archaeological and paleontological resources.
 - 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. 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.

3.4.3 Thresholds of Significance

The significance criteria used to evaluate the Proposed Project's impacts related to cultural resources are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and, as applicable, the March JPA CEQA Guidelines (March JPA 2022). For the purposes of the analysis in this EIR, a significant impact related to cultural resources would occur if the Proposed Project would:

- CUL-1 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5.
- CUL-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5.
- CUL-3 Disturb any human remains, including those interred outside of dedicated cemeteries.

3.4.4 Impacts Analysis

NOTE: Revisions to the Threshold CUL-2 impact analysis below was requested by the Tribes during consultation and do not represent a new significant impact not identified in the Draft EIR. Through consultation with the Tribes, added mitigation clarifies the monitoring protocol process and does not identify new impacts. The mitigation measures fall in line with an extension of the original tribal cultural resources mitigation reflecting refinement of the regulatory body and further defining the tribal cultural resources process.

Threshold CUL-1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

No Impact. As discussed in Section 3.4.1, Sites 33-024853, CRM TECH 3611-1H, and CRM TECH 3611-2H, representing a drainage channel and two taxiways at March ARB, are the only potential "historic properties" or "historical resources" identified within the APE. These three sites were evaluated against the criteria for listing in the NRHP and the CRHR, and the results are summarized below.

Site 33-024853 (Drainage Channel)

The drainage channel (Site 33-024853) was found ineligible under all NRHP and CRHR designation criteria (see Section 3.4.2, Relevant Plans, Policies, and Ordinances). The drainage channel was not an important engineering project within the history and development of Riverside County, and it is not known to be directly associated with any other important historical events. Although it is associated with the event of post-World War II expansion at the former March Air Force Base, this segment of channel is not an important physical expression of this event or period in the current March ARB's history. It constitutes a minor utilitarian feature within the larger overall scheme of flood control development within the region, and it is one of many similar flood protective works built throughout Southern California. The channel was constructed by the U.S. Army Corps of Engineers and its contractors, not by individuals. There is no evidence that the subject channel has any known direct association with the productive lives of important individuals in local, regional, state, or national history. Thus, it does not demonstrate a unique or particularly close association with that event or with any other events (Criterion A/1) or persons (Criterion B/2) of recognized historic significance. Additionally, the channel does not stand out from other similar earthen flood-control channels as having architectural or engineering merits. Rather, the channel is of standard design and construction, not unlike any other simple earthen flood-control channel. Thus, it is not an important example of a style, type, period, region, or method of construction, nor is it known to represent the work of a prominent architect, designer, engineer, or builder (Criterion C/3). Finally, the channel demonstrates little potential for important historical/archaeological information, as the channel has not yielded, nor is it likely to yield, information important to the study of flood control systems of its particular type or vintage in local, state, or national history (Criterion D/4; Appendix E). Therefore, Site 33-024853 is not considered a historical resource for the purposes of CEQA.

Sites CRM TECH 3611-1H and CRM TECH 3611-2H (Taxiways A and G)

Taxiway A, Taxiway G, and the apron along Taxiway G are nondescript, minor infrastructure features of standard design and construction that date to the late historic period. As such, none of them stands out as an important example of a style, type, period, region, or method of construction, nor are they known to represent the work of a prominent architect, designer, engineer, or builder. Taxiway A was evidently built during the World War II-era expansion of the current March ARB, while Taxiway G and the apron were added during the early post-World War II era. As such, both sites are arguably associated with establishment and growth of what is now March ARB. However, as secondary, peripheral features of the current March ARB, they do not demonstrate a unique, important, or particularly close association with that event or with other events or persons of recognized historic significance. Furthermore, these working components of modern transportation infrastructure are subject to frequent maintenance and repairs, and as a result do not demonstrate any distinctively historical characteristics (Appendix E). Therefore, Sites CRM TECH 3611-1H and CRM TECH 3611-2H do not meet the criteria for listing in the NRHP or the CRHR, and do not qualify as "historic properties" or "historical resources."

As described above, none of the three identified sites meets the definition of a historic property or a historical resource. Thus, the Proposed Project would result in **no impact** to historical resources.

Threshold CUL-2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Less-Than-Significant Impact with Mitigation Incorporated. No Native American cultural resources were identified within the APE as a result of the CHRIS records search conducted on June 8, 2020, for the APE and a 1-mile buffer (Appendix E). In addition, NAHC reported that the Sacred Lands File search yielded negative results for Native American cultural resources in the APE. Finally, government to government consultation initiated by

March JPA has not resulted in the identification of a TCR within or near the APE to date. No TCRs have been identified by California Native American tribes as part of March JPA's completed AB 52 notification and consultation process. However, in Even though the previous studies returned negative results for cultural resources, there are known resources in the greater area that have been conveyed through consultation, but no geographically defined resources or TCRs have been identified within the APE. In consideration of the known sensitivity of the greater area surrounding the project site for cultural resources, as well as the requests for monitoring by the Soboba Band of Luiseño Indians, Mitigation Measure (MM) CUL-1 (Archaeological Monitoring) and MM-TCR-1 (Tribal Monitoring) are is included in the Proposed Project to provide for archaeological and tribal monitoring for all initial ground-disturbing activities (see Section 3.13.6), as well as the authority of the archaeological and tribal monitors to temporarily divert, redirect, or halt the ground-disturbing activities to allow for identification, evaluation, and potential recovery of cultural resources in coordination with MIPAAMarch JPA (see Section 3.4.5, Mitigation Measures, for the full text of all cultural resource mitigation measures). MM-CUL-2 (CRMTP) requires the development of a Cultural Resource Monitoring and Treatment Plan (CRMTP), prior to any ground disturbance. Additionally, MM-CUL-13 (Cultural Resources Worker Sensitivity Training) requires all construction personnel to complete a Cultural Resources Worker Sensitivity Training program prior to commencement of construction activities. MM-CUL-5 (Phase IV Report) requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. Therefore, impacts to Native American cultural resources would be less than significant with mitigation incorporated.

CRM TECH conducted a field survey of the APE on June 23, 2020, for archaeological resources. Additionally, a CHRIS records search was conducted for the APE and within a 1-mile buffer around the APE, and an NAHC Sacred Lands File search and tribal outreach were conducted. No archaeological resources were identified within the APE as a result of the CHRIS records search, Sacred Lands File Search, Native American tribal outreach, or field survey.

The geoarchaeological analysis conducted for the Proposed Project assessed the potential for the deposition and preservation of subsurface cultural deposits within the APE. Sources consulted for this purpose included topographic, geologic, and soil maps pertaining to the surrounding area. The results of the geoarchaeological analysis determined that surface soils within March ARB and the APE have been extensively disturbed by past construction and military activities since the beginning of Alessandro Aviation Field in 1918. In the APE, the presence of the drainage channel at Site 33-024853, the taxiways, and the underground utility lines indicate prior disturbances to the surface and subsurface sediments. Based on the APE's geoarchaeological profile, the surface and subsurface sediments in the APE are considered to have a low sensitivity for containing archaeological resources (Appendix E). However, it is possible that unanticipated discoveries could be encountered during ground-disturbing activities associated with the Proposed Project. If such unanticipated discoveries are encountered, impacts to archaeological resources would be potentially adverse. However, MM-CUL24 (Inadvertent Discovery of Archaeological Resources) will be implemented, which requires that all construction work occurring within 100 feet of a find immediately stop until the on-site qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find to determine the appropriate course of action (see Section 3.4.5). March ARB and MIPAAMarch JPA shall only grant authorization to resume construction after consultation with the qualified archaeologist, and such authorization shall be predicated on implementation of all appropriate measures to protect any possible archaeological resources.

Although the APE is considered to have low sensitivity for containing archaeological resources, it is possible that unanticipated discoveries could be encountered during ground-disturbing activities associated with the Proposed Project. If such unanticipated discoveries were encountered, impacts to archaeological resources would be

potentially significant. However, with implementation of **MM-CUL24**, which requires that all construction work occurring within 100 feet of the find immediately stop until the on-site qualified archaeologist can evaluate the significance of the find, potentially significant impacts to archaeological resources would be reduced to **less than significant with mitigation incorporated**.

Threshold CUL-3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Less-Than-Significant Impact with Mitigation Incorporated. No prehistoric or historic burials were identified within the APE as a result of the CHRIS or Sacred Lands File records search, tribal outreach, or field survey (Appendix E). Thus, the likelihood of encountering human remains as a result of implementation of the Proposed Project is low to nonexistent. However, it is possible that unanticipated human remains could be encountered during ground-disturbing activities associated with the Proposed Project, which would be a potentially significant impact. In the unexpected event that human remains are unearthed during construction activities within the APE, MM-CULTCR-3 (Inadvertent Discovery of Human Remains) would address potential impacts (see Section 3.13.6 3.4.5). With implementation of MM-CULTCR-3, the discovery of human remains would be handled in accordance with H&SC Section 7050.5 and PRC Section 5097.98, which state that in the event that human remains are discovered during construction, construction activity must be halted, and the contractor must contact the Riverside County Coroner to evaluate the discovery. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify NAHC within 24 hours. In accordance with PRC Section 5097.98, NAHC shall immediately notify the persons it believes to be the MLDs of the deceased Native American. The MLDs shall complete their inspection within 48 hours of being granted access to the site. The MLDs shall determine, in consultation with the property owner or their representative, the disposition of the human remains. Authorization to resume construction shall be given by MIPAAMarch JPA only after consultation with the MLDs and shall include implementation of all appropriate measures to protect any possible burial sites and/or human remains. With implementation of MM-CULTCR-3, impacts to human remains would be less than significant with mitigation incorporated.

3.4.5 Mitigation Measures

The following mitigation measures would be implemented to reduce potentially significant impacts to cultural resources from implementation of the Proposed Project:

MM-CUL-1

Archaeological and Tribal Monitoring. Prior to the commencement of ground-disturbing activities issuance of a grading permit, the project applicant shall retain an Archaeological Principal Investigator (Principal Investigator), meeting the Secretary of the Interior's Professional Qualification Standards, a qualified tribal monitor to monitor to oversee monitoring of all mass grading and trenching activities. The Project Archaeologist shall manage and oversee monitoring for all initial ground-disturbing activities and excavation of each portion of the project site including, but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition, etc. The Project Archaeologist shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with the Consulting Tribe(s) and MIPAA. The applicant shall secure an agreement with the tribe (or tribes) for tribal monitoring. The applicant shall submit a copy of a signed contract between the tribe (or tribes) and the landowner/applicant for the monitoring of the Proposed Project to March Air Reserve Base (ARB) and the March Joint Powers Authority (JPA)

Planning Director. The applicant shall provide a minimum of 30 days' advance notice to the tribe (or tribes) of all mass grading and trenching activities.

- MM-CUL-2 CRMTP. Prior to the <u>start eommencement</u> of ground-disturbing activities, the <u>Proposed</u> Project's qualified archaeological Principal Investigator (Principal Investigator), meeting the Secretary of the Interior's Professional Qualification Standards, in consultation with the <u>Consulting Tribe(s)</u>tribe, March ARB, <u>MIPAAMarch JPA</u>, and the construction manager, shall develop a Cultural Resource Monitoring and Treatment Plan (CRMTP). The CRMTP shall define the process to be followed upon discovery of cultural resources to ensure the proper treatment, evaluation, and management of cultural resources within the project site, should they be encountered during construction.
 - A. For purposes of CRMTP implementation, the project area subject to monitoring is defined as <u>follows</u>:
 - All areas within the project site boundary specifically in which ground-disturbing activities (e.g., including, but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition) will occur are subject to monitoring.
 - 2. Any on-site or off-site ancillary Proposed Project use areas or facility locations are subject to the protocols outlined in the CRMTP. These include, but are not limited to, access roadways, yards/support areas, easements, staging areas, and utility tie-ins.
 - B. The following shall be included in the CRMTP:
 - 1. Project description and location
 - 2. Project grading and development scheduling
 - 3. Roles and responsibilities of individuals on the Project
 - 4. The pre-grading meeting and Cultural Resources Worker Sensitivity Training (MM-CUL-3) details
 - 5. The protocols and stipulations that the contractor, MIPAA, Consulting Tribe(s), and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation (MM-CUL-4, MM-TCR-2)
 - 6. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items
 - 7. Contact information of relevant individuals for the Proposed Project
- <u>MM-CUL-3</u> <u>Cultural Resources Worker Sensitivity Training.</u> The CRMTP shall include a requirement for all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities. The Training shall be conducted by a qualified archaeologist (Project Archaeologist) <u>and representatives of the Consulting Tribe(s)</u>. The Training shall provide (1) the types and characteristics of cultural materials that may be identified during construction and an explanation of the importance of and legal basis for the protection of significant cultural resources; (2) proper procedures to follow in the event that cultural resources or human remains are uncovered during ground-disturbing activities, including procedures for work curtailment or redirection; and (3) protocols for contacting the site supervisor and archaeological

and tribal monitor upon discovery of a cultural resources or human remains. All new construction personnel must take the Training prior to beginning ground-disturbing activities.

Inadvertent Discovery of Archaeological Resources. In the event that cultural resources are inadvertently unearthed during excavation and grading activities for the Proposed Project, all earth-disturbing activities within a 100-foot radius of the area of the discovery shall cease and the Project Archaeologist shall notify March Air Reserve Base (ARB), March Inland Port Airport Authority (MIPAA), and the Consulting Tribe(s). The Project Archaeologist, in consultation with the Tribes, will evaluate the significance of the find and determine the appropriate course of action. Authorization to resume construction shall be given by March ARB and MIPAA only after an action plan has been agreed to and it has been fulfilled. The action plan shall include implementation of all appropriate measures to protect any possible archaeological resources. Treatment of tribal cultural resources inadvertently discovered during the Project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.

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

- 1. The Project Archaeologist and the tribal monitor(s) shall manage and oversee monitoring for all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition, etc. The Project Archaeologist and the tribal monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with March JPA.
- 2. If, during ground disturbing activities, potential cultural resources are inadvertently discovered, the Project Archaeologist and tribal monitor(s) shall immediately redirect grading operations in a 100 foot radius around the discovery and the following procedures shall be followed:
- A. All ground-disturbance disturbing activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the <u>project</u> applicant, <u>the Project Archaeologist</u>, the <u>Tribal Representative(s)</u>, and <u>MIPAA</u> the <u>Principal Investigator</u>, the <u>tribal representative(s)</u>, the <u>Project Archaeologist and tribal monitors</u>, and the <u>Planning Director</u> to discuss the significance of the find <u>pursuant to California Public Resources Code (PRC) Section 21083.2.</u>
- B. Grading or fFurther ground disturbance, including but not limited to grading, trenching, etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional tribal monitors if needed.
- d. Treatment and disposition of the inadvertently discovered cultural resources shall be carried out in one or more of the following methods:
- C. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property, so they are not subject to further disturbance in perpetuity as identified in MM-TCR-4 (Non-Disclosure).

- D. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archaeologist, in consultation with the Tribe, and shall be submitted to MIPAA for review and approval prior to implementation of said plan.
- E. Pursuant to PRC <u>California Public Resources Code</u> Section 21083.2(b), avoidance is the preferred method of preservation for <u>archaeological resources and</u> cultural resources.
 - ii. During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the Project Archaeologist. If removal of artifacts from the project site is necessary, each artifact shall be cataloged, and an inventory will be provided to the tribal monitor upon each addition. No recordation of sacred items is permitted without the written consent of the tribe.
 - iii. Following the completion of the Proposed Project, the applicant shall relinquish ownership of all cultural resources that have been determined to be of Native American origin to the tribe.

If the landowner and the tribe the project applicant and the Tribe(s) cannot come to a consensus agree on the significance of, or the mitigation for the Native American archaeological or cultural resources, these issues will be presented to the Planning Director MIPAA for decision. The Planning Director MIPAA shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources and the recommendations of the Project Archaeologist archaeological Principal Investigator and shall consider the cultural and religious principles and practices of the tribe. Notwithstanding any other rights available under the law, the decision of the MIPAA Planning Director shall be appealable to the March Joint Powers Commission JPA.

- F. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to MIPAA upon the completion of a treatment plan and final report detailing the significance and treatment finding.
 - On site reburial of the discovered items may occur and shall include measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed.
 - Regardless of discovery, at the completion of all ground disturbing activities, the Project Archaeologist shall prepare a Monitoring Report and submit it to March ARB; March JPA; the Eastern Information Center located at the University of California, Riverside; and the designated tribal government. The Monitoring Report will document all monitoring efforts and be completed within 60 days of conclusion of all ground disturbing activities.
- MM-CUL-5

 Phase IV Report. Prior to final inspection, the Project Archaeologist shall submit two copies of the Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. MIPAA shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the MIPAA Director shall clear this condition. Once the report(s) are determined to be adequate, two copies shall be submitted to the South Coastal Information Center at San Diego State University and one copy shall be submitted to the Pechanga Cultural Resources Department.

- MM-CUL-2 Inadvertent Discovery of Archaeological Resources: In the event that archaeological resources are inadvertently unearthed during excavation and grading activities for the Proposed Project, the contractor shall cease all earth disturbing activities within a 100 foot radius of the area of the discovery and notify March Air Reserve Base (ARB) and March Joint Powers Authority (JPA). The Project Archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall evaluate the significance of the find and determine the appropriate course of action. Authorization to resume construction shall be given by March ARB and March JPA only after consultation with the qualified archaeologist and shall include implementation of all appropriate measures to protect any possible archaeological resources.
- MM-CUL-3 Inadvertent Discovery of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the project contractor shall immediately halt work and contact the Riverside County Coroner to evaluate the discovery. The contractor shall also notify March Air Reserve Base (ARB) and March Joint Powers Authority (JPA). No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, NAHC shall immediately notify those persons it believes to be the most likely descendants (MLDs) of the deceased Native American. The MLDs shall complete their inspection within 48 hours of being granted access to the site. The MLDs shall then determine, in consultation with the property owner or their representative, the disposition of the human remains. Authorization to resume construction shall be given by March ARB and March JPA only after consultation with the MLDs and shall include implementation of all appropriate measures to protect any possible burial sites and/or human remains.

The following measures, provided in full in Section 3.13.6, Mitigation Measures, of the Tribal Cultural Resources section (Section III.3.4.7, below, of the Final EIR), shall also be implemented to reduce impacts to cultural resources:

- MM-TCR-1 (Tribal Monitoring)
- MM-TCR-2 (Final Disposition)
- MM-TCR-3 (Discovery of Human Remains)
- MM-TCR-4 (Non-Disclosure)

3.4.6 Level of Significance after Mitigation

No impact would occur relating to the Proposed Project causing a substantial adverse change in the significance of a historical resource.

With implementation of the following mitigation measures the potential impacts to archaeological resources would be reduced to less than significant with mitigation incorporated: MM-CUL-1, which requires archaeological and tribal monitoring during all initial ground-disturbing activities; potential impacts to TCRs would be reduced to less than significant. With implementation of MM-CUL-2, which requires that all construction work occurring within 100 feet of an archaeological resources find immediately stop until the on site qualified archaeologist can evaluate the significance of the find, potentially significant impacts to archaeological resources would be reduced to less

than significant. With implementation of MM-CUL-3, the Principal Investigator, in conjunction with the Tribe(s). March ARB, MIPAA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities; MM-TCR-3, under which the discovery of human remains would require handling in accordance with H&SC Section 7050.5 and PRC Section 5097.98, which state that in the event that human remains are discovered during construction, construction activity must be halted, and the area must be protected until consultation and treatment can occur as prescribed by law; MM-CUL-4, which requires that all construction work occurring within 100 feet of an archaeological resources find immediately stop until the on-site qualified archaeologist can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting.

With implementation of MM-CULTCR-3, potentially significant impacts to human remains would be reduced to less than significant.

3.4.7 Cumulative Effects

Historical Resources

The geographical area evaluated for cumulative impacts to historical resources encompasses areas within the jurisdictions in the vicinity of the project site, including <u>MIPAAMarch JPA</u>, the County of Riverside, and the Cities of Perris, Moreno Valley, and Riverside. As future growth occurs within the jurisdictions in the project vicinity, impacts to historical resources could occur due to the substantial historical-age resources known to occur in the area. The Project APE was surveyed for cultural resources relative to historical and archaeological resources. As discussed in Section 3.4.1, a pedestrian field survey of the Proposed Project's APE was conducted, and a Historic Properties Report was prepared by CRM TECH (Appendix E).

According to CEQA, the importance of cultural resources comes from their research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the potential cumulative loss of that information. No historical resources within the APE were found eligible for inclusion in the NRHP or the CRHR. As a result of the historic significance evaluation, Site 33-024853 (Drainage Channel) and Sites CRM TECH 3611-1H and CRM TECH 3611-2H (Taxiways A and G) were found ineligible under all NRHP and CRHR designation criteria. No other potential historic properties or historical resources were identified through the various avenues of research. As such, the Proposed Project was determined to result in no impact on historical resources.

A cumulative impact, in terms of historical resources, refers to the collective potential effect on historical resources due to modern or recent historical land use, that result from human activity. Considering the Proposed Project would have no impact on historical resources, **no cumulatively considerable impacts** related to historical resources would occur.

Archaeological Resources

No archaeological resources were observed with the APE. In the unlikely event that unanticipated archaeological resources are encountered during ground-disturbing activities, the following mitigation measures would reduce potentially significant impacts to archaeological resources to less-than-significant levels: MM-CUL-1, which requires archaeological monitoring during all initial ground-disturbing activities; MM-CUL-2, which requires the Principal

Investigator, in conjunction with the Tribe(s), March ARB, MIPAA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires all construction personnel to complete a Training prior to commencement of construction activities; MM-TCR-3, under which the discovery of human remains would require handling in accordance with H&SC Section 7050.5 and PRC Section 5097.98, which state that in the event that human remains are discovered during construction, construction activity must be halted, and the area must be protected until consultation and treatment can occur as prescribed by law; MM-CUL-4, which requires that all construction work occurring within 100 feet of an archaeological resources find immediately stop until the on-site qualified archaeologist can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. MM-CUL-2 requires that all construction work occurring within 100 feet of the find shall immediately stop until the on site qualified archaeologist can evaluate the significance of the find, which would reduce potentially significant impacts to archaeological resources to less than significant levels.

The cumulative projects listed in Table 3-1, Cumulative Projects (see the introduction to Chapter 3, Environmental Analysis), have the potential to result in discovery of unknown or subsurface archaeological resources of unknown significance, similar to the Proposed Project. Cumulative projects located in fully developed areas would have a low chance of accidental discoveries of unknown archaeological resources due to previous grading and development likely having removed, preserved, or destroyed archaeological resources that previously existed within the sites. However, because the Proposed Project and other projects identified within the cumulative impact study area are primarily mitigated by the collection and curation of information and the preservation of the most important resources, adequate mitigation has occurred for in situ appreciation of and access to information regarding those sites for future generations. This reduces the potential for cumulative effects from implementing the Proposed Project improvements. Therefore, implementation of the Proposed Project, in addition to the related projects identified in Table 3-1, would not result in cumulatively considerable impacts to archaeological resources.

Tribal Cultural Resources

Similar to archaeological resources, cumulative impacts to TCRs would result from an aggregate of disturbance and loss of Native American artifacts. Projects located in the cumulative projects area would have the potential to result in an impact to TCRs from grading, excavation, or other ground disturbing activities. Each of the cumulative projects would be required to comply with applicable laws for the proper handling of TCRs; therefore, a potentially significant cumulative impact would not occur. With implementation of MM-CUL-1, which requires tribal monitoring during all initial ground disturbing activities, potential impacts to TCRs would be reduced to less than significant. Therefore, implementation of the Proposed Project, in addition to the related projects identified in Table 3 1, would not result in cumulatively considerable impacts to TCRs.

Human Remains

Similar to cumulative impacts on archaeological resources, cumulative impacts to human remains would result from an aggregate of disturbance and loss of Native American remains. Projects located in the cumulative projects area would have the potential to result in an impact associated with human remains from grading, excavation, or other ground-disturbing activities. Each of the cumulative projects would be required to comply with applicable laws for the proper handling of human remains; therefore, a potentially significant cumulative impact would not occur. The Proposed Project is also subject to regulations addressing discovery of human remains and would implement MM-CULTCR-3. Therefore, implementation of the Proposed Project, in addition to the related projects identified in Table 3-1, would not result in cumulatively considerable impacts to human remains.

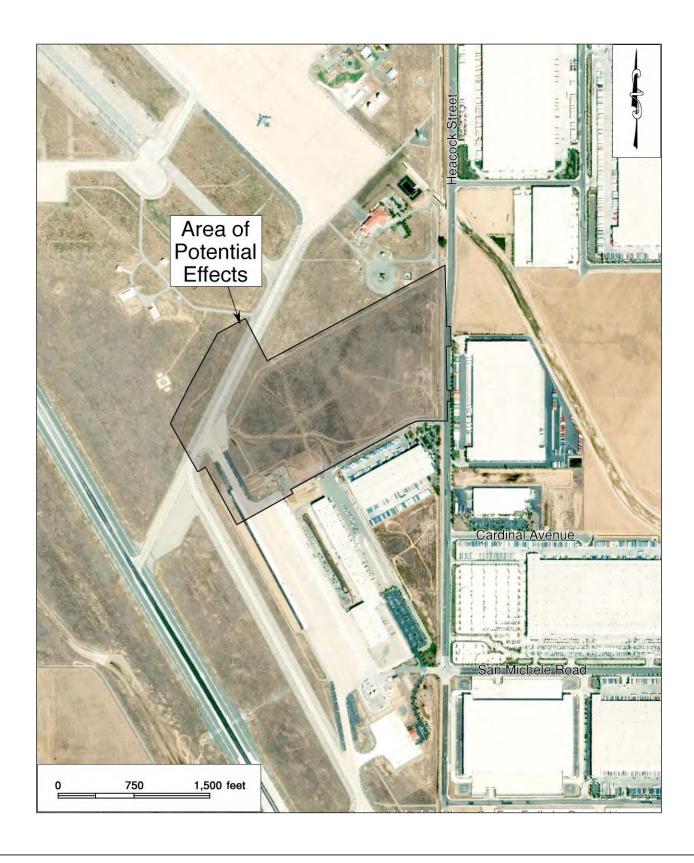
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III.3.4.4 Section 3.8, Hazards and Hazardous Materials

Section 3.8.4, Impacts Analysis; Threshold HAZ-2

NOTE: In response to comments received from the City of Riverside, the following has been added to the operations discussion to address the potential impacts from hazardous materials released due to an aircraft accident (See Comment A-8.20 and Response A-8.20, Chapter II, Responses to Comments, of this Final EIR). Additional revisions reflect Riverside ALUC's consistency finding (Appendix R to the Final EIR).

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Operation

Aircraft fueling would be subject to the MIP Airport Authority Rules and Regulations, which include BMPs for protection of stormwater (refer to Section 3.9, Hydrology and Water Quality). These protections include spill prevention and response procedures and BMPs for fueling that would reduce the likelihood for an upset or accident condition involving the release of fuels to soil and groundwater and include stormwater conveyances. Fueling would occur in designated paved areas by trained personnel and with spill protection measures in place. Specific spill protection measures (BMPs) would include placement of spill response kits adjacent to refueling locations (or equivalent measure as approved by MIPAAthe March JPA); kits would include sufficient materials to contain the likely release volume during fueling.

In the unlikely event that hazardous materials are released due to an aircraft accident, accident response would also be subject to the MIP Airport Authority Rules and Regulations, which provide procedures for emergency response both within the terminal and for aircraft parked at the terminal gates. Response procedures for accidents that may result in a release of hazardous materials, such as aircraft fires and fuel spills, are outlined in the Rules and Regulations. Procedures involve notification of authorities and airport command, evacuation of tenants or workers, and containment of the spill. Therefore, potential impacts during operations would be less than significant.

Section 3.8.4, Impacts Analysis; Threshold HAZ-4

NOTE: In response to the Riverside County ALUC consistency finding with the March ARB/Inland Port Airport Land Use Compatibility Plan on March 13, 2025 (Appendix R to the Final EIR), the following has been added.

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- Aboveground bulk storage (greater than 6,000 gallons) of hazardous materials is discouraged.
- March ARB must be notified of any land use having an electromagnetic radiation component to assess whether a potential conflict with Air Base radio communications could result. Sources of electromagnetic radiation include microwave transmission in conjunction with a cellular tower, radio wave transmission in conjunction with remote equipment inclusive of irrigation controllers and other similar electromagnetic radiation emissions.

Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R), subject to specific conditions related to outdoor lighting, reflective materials, generation of environments that would attract birds, activities that generate electrical interference, sensitive receptors, noise, and other flight hazards.

Construction

Construction employees on the project site would be exposed to noise levels within the 65 dBA CNEL noise level contour, in addition to noise due to construction equipment. As required by Cal/OSHA, a hearing conservation program and readily available hearing protection for employees are required for exposure to noise above 85 dBA over an 8-hour TWA. The TWA would be calculated as outlined in 8 CCR, Section 5097. Therefore, with adherence to state regulations, potential hazard impacts due to noise during construction would be **less than significant**.

To avoid and/or minimize potential safety hazards for people working within Zone B2, the March ARB/Inland Port Airport ALUCP requires an airspace review for objects greater than 35 feet; however, the height criterion is for general guidance and airspace review requirements are determined on a site-specific basis in accordance with 14 CFR, Part 77 (County of Riverside 2014). The proposed cargo building would have a maximum height of 45 feet, as shown in Figure 2-6, Cargo Building Elevations; therefore, airspace review in accordance with 14 CFR, Part 77, is required prior to publication of the Draft EIR. Also, pursuant to Table 9.05.040-8, Industrial Site Development Minimum Standards, of the March JPA Development Code, maximum building height for development in the Aviation (A) district is 45 feet.

FAA issued Determinations of No Hazard (FAA 2020a, 2020b, 2020c, and 2020d) letters for the proposed cargo building corners on September 3, 2020. Because the FAA plan review did not identify any safety hazards that would interfere with aircraft operations, **no impacts** for potential safety hazards to people working within the vicinity of a public airport would occur.

Additionally, ALUC review is required for the Proposed Project in accordance with Section 1.5.3(a)(9) of Chapter 2, Countywide Policies, of the Riverside County ALUCP. As previously stated, airspace review by the ALUC is generally required for objects in Zone B2 that are greater than 35 feet tall; in this case, ALUC review is required for any development on the project site, based on its location within the ALUCP area. Riverside ALUC considered the complete application including the FAA hazard determination, as part of the Proposed Project's consistency review, and determined the Proposed Project is consistent with the ALUCP (Appendix R). Although the ALUCP notes that a height of 35 feet is for general guidance and that taller objects may be accepted if determined not to be obstructions (County of Riverside 2014, Table MA 2: Basic Compatibility Criteria), this document assumes that airspace review would be required. Therefore, documents would be submitted and reviewed in accordance with ALUC regulations, and approvals would be required prior to March JPA approval of the Proposed Project. This formal review process is required; however, based on a review of the ALUCP the Proposed Project is believed to be consistent with the ALUCP and it is anticipated that the Proposed Project will be approved. Additionally, based on the Determinations of No Hazard received from the FAA, similar determinations are anticipated from the ALUC and aAs such, no impacts for potential safety hazards would occur during Proposed Project construction.

Section 3.8.5, Mitigation Measures

NOTE: In response to comments received from March ARB, MM-HAZ-1 has been revised to include March ARB's review of the HMCP prior to grading (See Comment A-7.15, Response A-7.15, Chapter II, Response to Comments, of this Final EIR).

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MM-HAZ-1 Hazardous Materials Contingency Plan. Prior to issuance of a grading permit, the project applicant shall submit to March JPA MIPAA and March ARB for review and approval a hazardous materials contingency plan (HMCP) that addresses the potential impacts to soil, soil vapor, and

groundwater beneath the project site to ensure the health and safety of construction workers and future occupants of the industrial uses on the site. The HMCP shall include procedures for assessment, characterization, handling, transportation, and disposal of potentially contaminated soils and soil vapor, including metals, PAHs, petroleum hydrocarbons and PFAS in soil, and TCE in soil vapor. Contaminated soils shall be managed and disposed of in accordance with federal, state, and local regulations, and in accordance with the rules of the receiving landfill. The HMCP shall be submitted to U.S. Environmental Protection Agency Region IX and the state (California Department of Toxic Substances Control and the Santa Ana Regional Water Quality Control Board) for review of the protective measures during work within Site 7, which is under an Environmental Restrictive Covenant. The HMCP shall include health and safety measures for handling contaminated soils and working in potentially contaminated soil vapor, including procedures for soil vapor and breathing zone monitoring in accordance with South Coast Air Quality Management District (SCAOMD) Rule 1166, and control of fugitive dust emissions in accordance with SCAOMD Rules 1403 and 1466. The HMCP shall be implemented at all times during excavation, grading, and construction activities, or other activities that could disturb or be impacted by site soils or soil vapors.

III.3.4.5 Section 3.10, Land Use and Planning

NOTE: Typographical errors were corrected. Additional revisions reflect Riverside ALUC's consistency finding (Appendix R to the Final EIR).

Section 3.10.2, Relevant Plans, Policies, and Ordinances; Local; Environmental Justice Element

NOTE: In response to the R-NOW and Center for Community Action petition to challenge the Environmental Justice Element of the Riverside County General Plan, the following discussion has been added.

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In April 2024, March JPA adopted an Environmental Justice Element for its General Plan (March JPA 2024). The Environmental Justice Element incorporates the environmental justice policies of the County of Riverside Healthy Communities Element pursuant to California 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 goal of the Environmental Justice Element is to ensure the consideration of environmental justice policies 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.

On May 29, 2024, Petitioners R-NOW and Center for Community Action and Environmental Justice filed a petition for writ of mandate, challenging the Environmental Justice Element (Riverside Superior Court Case No. CVRI2402936). On June 25, 2025, Petitioners filed a request for dismissal and the case is closed.

Section 3.10.4, Impacts Analysis; Threshold LU-1, Table 3.10-1

Subheading "Land Use Element"

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Goal/Policy Number	Goal or Policy	Consistency Analysis
Land Use Ele	ment	
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. The Proposed Project would enable the operations capacity of the MIP Airport to be more fully utilized to meet regional demands for air cargo services within Southern California, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region. The Proposed Project includes development of a gateway air cargo center that would be consistent with the General Plan land use designation of Aviation (AV). Based on review of the March ARB/Inland Port ALUCP, it is anticipated that the Proposed Project would demonstrate consistency Riverside ALUC determined the Proposed Project to be consistent with the land uses in the March ARB/Inland Port ALUCP (Appendix R to the Final EIR). In addition, the project applicant is requesting a zoning designation of Aviation (A) for the project site, consistent with the existing General Plan land use designation, as no zoning designation is currently assigned to the project site by the March JPA.

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Goal/Policy Number	Goal or Policy	Consistency Analysis
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 overlaps the Clear Zone (CZ) and Accident Potential Zone (APZ) I (March ARB 2018), located south of the Runway 12-30 alignment; however, the cargo building would be located outside of these zone boundaries. The Riverside County ALUCP identifies the project site as Zone B2, High Noise Zone. The Proposed Project would undergo ALUC review to demonstrate the proposed development is consistent with the ALUCP criteria for Zone B2 prior to approval of the Proposed Project. Based on review of the March ARB/Inland Port ALUCP, it is anticipated that the Proposed Project would demonstrate consistency with Zone B2 criteria and Riverside ALUC determined the Proposed Project is consistent with the ALUCP criteria for Zone B2 (Appendix R to the Final EIR). The Proposed Project therefore would not conflict with existing airfield operations.

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Goal/Policy Number	Goal or Policy	Consistency Analysis
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. The project site is located in March ARB/Inland Port ALUCP Compatibility Zone B2, which allows for the uses proposed by the Proposed Project. The project site overlaps the Clear Zone (CZ) and Accident Potential Zone (APZ) I (March ARB 2018), located south of the Runway 12-30 alignment; however, the cargo building would be located outside of these zone boundaries. The Proposed Project would be developed in accordance with the March JPA Development Code that would ensure the Proposed Project meets the setback requirements, height restrictions, site and building design, site orientation, etc. that would be compatible with adjacent and surrounding land uses. Based on review of the March ARB/Inland Port ALUCP, it is anticipated that the Proposed Project would be consistent with the criteria established for Compatibility Zone B2, Riverside ALUC determined the Proposed Project is consistent with the criteria established for Compatibility Zone B2 (Appendix R to the Final EIR) and therefore would not conflict with the existing or long-term needs of the Air Force Reserve at March ARB.
Policy 6.5	Ensure that plans and development conform to the draft Comprehensive Land Use Plan for March AFB/March Inland Port.	Consistent. Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R to the Final EIR). Based on review of the March ARB/Inland Port ALUCP, it is anticipated that the Proposed Project would conform to the March ARB/Inland Port ALUCP. Prior to Proposed Project approval, the Proposed Project would require review by the Riverside County ALUC, and ultimately, an ALUCP consistency finding.

Page 3.10-17

Goal/Policy Number	Goal or Policy	Consistency Analysis
Policy 6.7	Ensure that land uses adhere to floor area ratios applicable under California Department of Transportation (Caltrans) guidelines for airports.	Consistent. The Proposed Project conforms to the floor area ratios as adopted in the March ARB/Inland Port ALUCP, which are more restrictive than the Caltrans guidelines for airports. Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R to the Final EIR).

Page 3.10-18

Goal/Policy Number	Goal or Policy	Consistency Analysis
Policy 7.6	Plan for compatible land uses within the aviation area.	Consistent. The project site is located in March ARB/Inland Port ALUCP Compatibility Zone B2, which allows for the uses proposed by the Proposed Project. The project site overlaps the Clear Zone (CZ) and Accident Potential Zone (APZ) I (March

Goal/Policy Number	Goal or Policy	Consistency Analysis
		ARB 2018), located south of the Runway 12-30 alignment; however, the cargo building is proposed outside of these zone boundaries. The Proposed Project would be developed in accordance with the March JPA Development Code that would ensure the Proposed Project meets the setback requirements, height restrictions, site and building design, site orientation, etc. that would be compatible with adjacent and surrounding land uses. Based on the latter, as well as review of the March ARB/Inland Port ALUCP, it is anticipated that the Proposed Project would comply with the criteria established for Compatibility Zone B2-Riverside ALUC determined the Proposed Project is consistent with the criteria established for Compatibility Zone B2 (Appendix R to the Final EIR) and therefore would not conflict with the existing aviation operations in the vicinity of the project site.

Page 3.10-23

Goal/Policy Number	Goal or Policy	Consistency Analysis
Policy 15.1	Ensure all hazardous materials are stored, treated, and disposed in accordance with state and federal law.	Consistent. The project site is located within Riverside County ALUCP Compatibility Zone B2. The March ARB/Inland Port ALUCP (2014) and the March ARB AICUZ Study (2018) impose restrictions and limitations on the types and quantities of uses and hazardous materials that can be stored on sites within the B2 zone. Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R to the Final EIR). As discussed in Section 3.8, Hazards and Hazardous Materials, of this EIR, any hazardous materials used on site would be stored, treated, and disposed of in accordance with state and federal law. MM-HAZ-1 (Hazardous Materials Contingency Plan) and MM-HAZ-2 (Stop Work, Groundwater Management) would also be implemented to ensure hazardous materials would be properly handled, stored, treated, and disposed of.

Subheading "Transportation Element"

Page 3.10-25

Goal/Policy Number	Goal or Policy	Consistency Analysis
Policy 2.6	FAA standards, military AICUZ, and appropriate Comprehensive Land Use Plan for March Airfield shall be upheld and supported to encourage and realize a safe	Consistent. The project site overlaps the Clear Zone (CZ) and Accident Potential Zone (APZ) I (March ARB 2018), located south of the Runway 12-30 alignment; however, the cargo building is proposed outside of these zone boundaries. The Riverside County ALUCP identifies the project site as Zone B2, High Noise Zone. The Proposed Project would undergo ALUC review to demonstrate the proposed development is

Goal/Policy Number	Goal or Policy	Consistency Analysis
	environment in and around the aviation field.	consistent with the ALUCP criteria for Zone B2 prior to approval of the Proposed Project. Riverside ALUC determined the Proposed Project is consistent with the ALUCP criteria for Zone B2 (Appendix R to the Final EIR). Consistency with Zone B2 criteria would-ensures that the Proposed Project would not conflict with existing airfield operations.

Page 3.10-27

Goal/Policy Number	Goal or Policy	Consistency Analysis
Goal 9	Develop measures which will reduce the number of vehicle-miles travelled during peak travel periods.	Consistent. The Proposed Project would develop an employment-generating land use, similar to existing permitted land uses in the vicinity. Development of the Proposed Project would provide new job opportunities to residents in the region, improving the jobs/housing balance. The Proposed Project would reduce commutes to large urban centers such as Los Angeles or Orange County and reduce VMT associated with longer commutes as discussed in Section 3.12, Transportation, of this EIR. MM-AQ-5 is intended to reduce employee commute trips and corresponding VMT. The provision of preferential parking spaces is intended to encourage employees to carpool or vanpool together. The provision of short- and long-term bicycle parking is intended to encourage alternative transportation. The provision of showers, lockers, and changing space is intended to encourage bicycling or other alternative transportation by allowing employees to prepare for work after completing their trip. The provision of on-site food encourages employees to stay on site for food breaks rather than make trips off site, resulting in vehicle trips. The requirement to establish and promote a rideshare program helps to discourage single-occupancy vehicle trips.
Policy 9.2	Provide preferential parking for carpools and vanpools, where appropriate.	Consistent. Through implementation of MM-AQ-45 (Commute Trip Reduction), 5% of vehicle/employee parking within the project site would be reserved as preferential spaces for carpools and vanpools.

Subheading "Noise/Air Quality Element"

Page 3.10-28

Goal/Policy Number	Goal or Policy	Consistency Analysis
Policy 1.1	Establish acceptable limits of noise for various land uses throughout the March JPA Planning Area. Future	Consistent. The Proposed Project would be directly south and east of March ARB. Based on the Riverside County ALUCP noise level contours of the March ARB/Inland Port Airport, the project site is located in the B2 High Noise Zone, which

Goal/Policy Number	Goal or Policy	Consistency Analysis
	development that could increase ambient noise levels shall be required to mitigate the anticipated noise increase, to the extent possible.	represents areas of high noise and a moderate accident potential risk. The project site is located within the 60 to 70 dBA CNEL noise level contour boundaries of March ARB/Inland Port Airport. Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R to the Final EIR). Based on the AICUZ noise level contours, the Proposed Project represents a compatible land use (Table 6-2 of the 2018 AICUZ) as discussed in Section 3.11, Noise, of this EIR.

Page 3.10-29

Goal/Policy Number	Goal or Policy	Consistency Analysis
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.	Consistent. The Proposed Project would be directly south and east of March ARB. Based on the Riverside County ALUCP noise level contours of the March ARB/Inland Port Airport, the project site is located in the B2 High Noise Zone, which represents areas of high noise and a moderate accident potential risk. The project site is located within the 60 to 70 dBA CNEL noise level contour boundaries of March ARB/Inland Port Airport. Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R to the Final EIR). Based on the AICUZ noise level contours, the Proposed Project represents a compatible land use (Table 6-2 of the 2018 AICUZ) as discussed in Section 3.11, Noise, of this EIR.
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. The Proposed Project would be directly south and east of March ARB, with industrial development to the south and west. Based on the Riverside County ALUCP noise level contours of the March ARB/Inland Port Airport, the project site is located in the B2 High Noise Zone, which represents areas of high noise and a moderate accident potential risk. The project site is located within the 60 to 70 dBA CNEL noise level contour boundaries of March ARB/Inland Port Airport. Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R to the Final EIR). Based on the AICUZ noise level contours, the Proposed Project represents a compatible land use (Table 6-2 of the 2018 AICUZ).

Page 3.10-30

Goal/Policy Number	Goal or Policy	Consistency Analysis
Policy 3.3	Adhere to the adopted AICUZ and Comprehensive Land Use Plan standards and promote the use of newer and quieter	Consistent. The project site overlaps the Clear Zone (CZ) and Accident Potential Zone (APZ) I (March ARB 2018), located south of the Runway 12-30 alignment; however, the cargo building is proposed outside of these zone boundaries. The Riverside County ALUCP identifies the project site as Zone B2,

Goal/Policy Number	Goal or Policy	Consistency Analysis
	aircraft and support equipment.	High Noise Zone. The Proposed Project would undergo ALUC review to demonstrate the proposed development is consistent with the ALUCP criteria for Zone B2 prior to approval of the Proposed Project. Riverside ALUC determined the Proposed Project is consistent with the ALUCP criteria for Zone B2 (Appendix R to the Final EIR). Consistency with Zone B2 criteria would ensures that the Proposed Project would not conflict with existing airfield operations.

Page 3.10-31

Goal/Policy Number	Goal or Policy	Consistency Analysis
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. MM-AQ-2 requires the annual provision of information to employees and truck drivers about electric vehicle charging availability and alternate transportation opportunities for commuting. MM-AQ-45 requires any tenant agreement to include 5% reserved parking spaces for carpools and vanpools, provision of short- and long-term bicycling parking facilities and 'end-of-trip' facilities, on-site food vending or kitchen equipment and mail facilities, and establishment of rideshare program with financial incentives.

Page 3.10-31

Goal/Policy Number	Goal or Policy	Consistency Analysis
Policy 3.4	Encourage ride share programs.	Consistent. The project would comply with this policy through implementation of MM-AQ-45, which would provide preferential parking spaces for carpools and vanpools and establish a rideshare program with financial incentives.

Subheading "Safety/Risk Management Element"

Pages 3.10-44-3.10-45

Goal/Policy Number	Goal or Policy	Consistency Analysis
Goal 5	Reduce the potential for hazardous material exposure or contamination in the Planning Area.	Consistent. The project site is located within Riverside County ALUCP Compatibility Zone B2. The March ARB/Inland Port ALUCP (2014) and the March ARB AICUZ Study (2018) impose restrictions and limitations on the types and quantities of uses and hazardous materials that can be stored on sites within the

Goal/Policy Number	Goal or Policy	Consistency Analysis
		B2 zone. Riverside ALUC determined the Proposed Project is consistent with the ALUCP (Appendix R to the Final EIR). As discussed in Section 3.8, Hazards and Hazardous Materials, of this EIR, any hazardous materials used on site would be stored, treated, and disposed of in accordance with state and federal law. MM-HAZ-1 (Hazardous Materials Contingency Plan) and MM-HAZ-2 (Stop Work, Groundwater Management) would also be implemented to ensure hazardous materials would be properly handled, stored, treated, and disposed of.

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Goal/Policy Number	Goal or Policy	Consistency Analysis
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. The project site overlaps the Clear Zone (CZ) and Accident Potential Zone (APZ) I (March ARB 2018), located south of the Runway 12-30 alignment; however, the cargo building is proposed outside of these zone boundaries. The Riverside County ALUCP identifies the project site as Zone B2, High Noise Zone. The Proposed Project would undergo ALUC review to demonstrate the proposed development is consistent with the ALUCP criteria for Zone B2 prior to approval of the Proposed Project. Based on review of the March ARB/Inland Port ALUCP, it is anticipated that the Proposed Project would be consistent with Zone B2 criteria Riverside ALUC determined the Proposed Project is consistent with the ALUCP criteria for Zone B2 (Appendix R to the Final EIR) and therefore would not conflict with existing airfield operations. Additionally, the Proposed Project would be developed in accordance with the March JPA Development Code that would ensure the Proposed Project meets the setback requirements, height restrictions, site and building design, site orientation, etc. that would be compatible with adjacent and surrounding land uses. An FAA Form 7460-1 application to FAA for an Obstruction Evaluation/Airport Airspace Analysis would be submitted to ensure the Proposed Project would not create obstructions to air navigation.

Section 3.10.4, Impacts Analysis; March ARB/Inland Port Airport Land Use Compatibility Plan Consistency

Pages 3.10-48 to 3.10-49

Less-Than-Significant Impact with Mitigation Incorporated. The purpose of the March ARB/Inland Port ALUCP is to promote compatibility between 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. The project site is subject to compliance with the March ARB/Inland Port ALUCP (Riverside County ALUC 2014). As identified in the ALUCP, the project site is located in the B2 Zone, High Noise Zone for the March ARB/Inland Port Airport. The B2 Zone is subject to high noise and a moderate accident potential risk (Riverside County ALUC 2014). The land uses prohibited within the B2 Zone include new dwellings, children's schools, daycare centers, libraries, hospitals, congregate care facilities, hotels/motels, places of assembly, buildings with more than three aboveground habitable floors, noise-sensitive outdoor nonresidential uses, critical community infrastructure facilities, and hazards to flight (Riverside County ALUC 2014). Within the B2 Zone, aboveground bulk storage of hazardous materials is discouraged, and air space review is required for objects greater than 35 feet in height. On March 13, 2025, Riverside ALUC determined the Proposed Project was consistent with the ALUCP, subject to certain conditions (Appendix R to the Final EIR).

Building Height Compatibility

The proposed cargo building would have a maximum building height of 45 feet, which would require an airspace review because the height exceeds 35 feet. To ensure the cargo building is designed pursuant to the height restriction criteria in 14 CFR Section 77.17, the project applicant would be required to submit an FAA Form 7460-1 application to FAA for an Obstruction Evaluation/Airport Airspace Analysis to ensure the Proposed Project would not create obstructions to air navigation. FAA reviews the application and issues a hazard determination. The Riverside ALUC considered considers the complete application including the FAA hazard determination, as part of the Proposed Project's consistency review (Appendix R to the Final EIR). Based on review of the ALUCP it is anticipated that the Proposed Project would demonstrate consistency with the ALUCP and would therefore be approved by the ALUC. Once the ALUC approves of the Proposed Project, the relevant permits have been issued, and the building has been constructed, FAA Form 7460-2 would be completed by the project applicant or their designee and e-filed with FAA within 5 days after construction of the Proposed Project reaches its greatest height. Impacts relating to building height compatibility would be less than significant.

Aircraft Noise Compatibility

As identified in the ALUCP (Riverside County ALUC 2014), parts of the project site are within the 60 to 70 dBA CNEL aircraft noise contours for the Proposed Project. Because the proposed land uses are not considered sensitive to noise and considering typical anticipated building construction noise attenuation of approximately 20 decibels (dB) (Riverside County ALUC 2014), the occupants within the proposed cargo building would thus be exposed to aircraft noise levels between 40 and 50 dBA CNEL. Noise levels up to 75 dBA CNEL are normally acceptable at industrial/manufacturing land uses and noise levels up to 70 dBA CNEL are normally acceptable at commercial/office land uses within the March JPA jurisdiction (March JPA 1999a). Implementation of Mitigation Measure (MM) NOI-1 (Construction Worker Hearing Protection; refer to Section 3.11.6 for complete measure) requires that the applicant shall provide evidence that the Proposed Project plans contain the requirements and restrictions with respect to personal protective equipment (PPE) and noise hazard information for onsite construction workers. Implementation of MM-NOI-2 (Future Tenant Aircraft Fleet; refer to Section 3.11.6 for complete measure) requires documentation of tenant's aircraft fleet noise emissions to confirm impacts identified in this EIR. As such, occupants within the proposed cargo building would not be exposed to significant aircraft-generated noise. Thus, it is anticipated that the Proposed Project would be consistent with the aircraft noise compatibility requirements of the ALUCP (Appendix R to the Final EIR); impacts would be less than significant with mitigation incorporated.

Page 3.10-50

Single-Acre Maximum Intensity. Using the Aircraft Hangars and Industrial Uses occupancy rate of one person per 500 square feet of building space, within 1 acre of building (43,560 square feet) the Proposed Project could accommodate 87.1 people,7 which is consistent with single-acre criterion of 250 people per acre.

Although land use intensities analyzed herein conclude Riverside ALUC determined that the Proposed Project would be consistent with the maximum land use intensity thresholds established for Zone B2 (Appendix R to the Final EIR)., the ALUC will conduct land use intensity estimates themselves during ALUC review. As such, implementation of MM-LU-1 (Occupancy Limits; refer to Section 3.10.5 for complete measure) would ensure that the Proposed Project complies with permitted land use intensities within Zone B2.

Therefore, the Proposed Project would be consistent with the March ARB/Inland Port ALUCP, and impacts would be less than significant with mitigation incorporated.

III.3.4.6 Section 3.12, Transportation

Section 3.12.3, Project Design Features

NOTE: PDF-TRA-1 has been revised in response to a request by the City of Moreno Valley (See Comment A-6.11 and Response A-6.11, Chapter II, Response to Comments of this Final EIR).

Page 3.12-10

PDF-TRA-1 Payment of Fair-Share Cost.

- <u>A.</u> To address operational deficiencies at off-site intersections, prior to the issuance of a certificate of occupancy, the Proposed Project shall contribute \$281,498 (with Heacock Street Extension) as its fair share toward the improvement measures provided in Table 1-5, Summary of Improvements and Rough Order of Magnitude Costs with Heacock Street Extension, of the Traffic Analysis (Appendix M-1 to this EIR).
- B. The applicant shall pay a fair-share contribution to the City of Moreno Valley for the pavement maintenance over a 30-year cycle of the following roadway segments:
 - a. Heacock Street from the access roadway to Cactus Avenue.
 - b. Heacock Street from the access roadway to San Michele Road.
 - c. Cactus Avenue from Heacock Street to the western City limits.
 - d. Indian Street from San Michele Road to the southern City limits.
 - e. Perris Boulevard from San Michele Road to the southern City limits.
- <u>C.</u> The applicant agrees to pay an aggregate amount for pavement maintenance described in subsection B up to a maximum of \$324,173.00, which shall be payable in annual installments equal to \$10,805.76.

⁷ 43,560 square feet/500 square feet = 87.1 people.

Section 3.12.6, Mitigation Measures

NOTE: MM-TRA-2 has been revised in response to a request by the City of Moreno Valley (See Comment A-6.10 and Response A-6.110 Chapter II, Response to Comments of this Final EIR).

Page 3.12-21

MM-TRA-2

Project Truck Route on Heacock Street. The project applicant shall ensure that all leasing agreements for the Proposed Project require that all Proposed Project truck traffic utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. The intersection improvements at Heacock Street shall include installed signage directing trucks to the Harley Knox Boulevard interchange. Prior to issuance of a certificate of occupancy, a traffic management plan shall be submitted to MIPAA and the City of Moreno Valley to manage and identify potential hazards associated with the Proposed Project within the City of Moreno Valley. Initial drive counts (to include vehicle classification) shall be provided to the City of Moreno Valley within one (1) year of occupancy and thereafter every three (3) years for up to ten (10) years from occupancy.

III.3.4.7 Section 3.13, Tribal Cultural Resources

NOTE: In response to comments received from Pechanga Band of Indians and Soboba Band of Luiseño Indians, the following changes have been made to the Tribal Cultural Resources section of the EIR. The Existing Conditions, Cultural Setting, discussion has been moved to Section 3.13.2, and CHRIS Records Search discussion has been removed.

3.13 Tribal Cultural Resources

This section describes the existing conditions relating to <u>Tribal Cultural Resources</u> tribal cultural resources (TCRs) of the proposed Meridian D-1 Gateway Aviation Center Project (Proposed Project) site (project site) and vicinity, identifies associated regulatory requirements, evaluates potential impacts related to the implementation of the Proposed Project, and identifies a mitigation measure to minimize these impacts. The following reference was used in the preparation of this section of the Draft Environmental Impact Report (EIR):

Identification and Evaluation of Historic Properties: Gateway Aviation Center Project (Historic Resources Report) prepared by CRM TECH in September 2020 (Appendix E)

On July 1, 2015, Assembly Bill (AB) 52 went into effect amending the California Environmental Quality Act (CEQA) to include TCRs as a new class of resources and requiring additional considerations relating to Native American consultation. A TCR, in general, is similar to the federally defined Traditional Cultural Properties. However, AB 52 incorporates considerations of local and state significance and requires mitigation under CEQA. TCRs may include resources that are listed in or eligible for listing in the California Register of Historical Resources (CRHR), such as archaeological sites, districts, or landscapes, or other kinds of resources that the CEQA lead agency chooses to treat as TCRs through tribal consultation.

The analysis in this section of the EIR is based on the results on the tribal consultation performed by the March Joint Powers Authority (JPA) as the lead agency for the Proposed Project. Other sources consulted are listed in Section 3.13.89, References Cited.

As discussed in detail in Chapter 2, Project Description, of this EIR, the Proposed Project consists of two components: the Air Cargo Center Component and the Off-Site Component. The Air Cargo Center Component involves the development of a gateway air freight cargo center, including taxilane/taxiway and parking improvements, within an approximately 34-acre site within March Inland Port Airport under the jurisdiction of MIPAAMarch JPA. The Off-Site Component of the Proposed Project includes taxiway and other infrastructure improvements within approximately 12 acres of March Air Reserve Base (ARB). Once constructed, the Proposed Project would average have a maximum of 17 two-way flights per day, 6 days per week (non-peak). During the peak season (i.e., late November through late December), the Proposed Project would average have a maximum of 21 two-way flights per day, 6 days per week, over a 4-week period. Aircraft Flight operations would occur between 7:00 a.m. and 11:00 p.m. (approximately 5% of the proposed aircraft flight operations would occur between 10:00 p.m. and 11:00 p.m.).

3.13.1 Tribal Outreach

This section describes the tribal outreach that has occurred as a result of the Proposed Project.

Native American Heritage Commission Sacred Lands File Search

All Native American coordination efforts for the Proposed Project were addressed as part of CRM TECH'S technical results included in Appendix E. CRM TECH requested a review of the Native American Heritage Commission (NAHC) Sacred Lands File on April 21, 2020. The Sacred Lands File request is a cultural resources requirement and is not a form of consultation. In response to CRM TECH'S inquiry, NAHC reported that the Sacred Lands File search yielded negative results for Native American cultural resources in the APE, although NAHC did note that the absence of specific information did not indicate the absence of cultural resources and recommended that local Native American groups be contacted for further information. NAHC provided a list of potential contacts in the region for that purpose.

CRM TECH contacted the eight individuals on the NAHC <u>Sacred Lands File</u> list on May 1, 2020, and follow-up telephone solicitations were carried out from May 15 through May 22, 2020. <u>This outreach was conducted during COVID-19</u>, when many Tribes reduced staff out of caution for their health; therefore, a lack of prompt response was not necessarily a reflection of a Tribe's interest in the Proposed Project. CRM TECH received five responses (four written; one via telephone) from the following tribal representatives: Bobby Ray Esparza, Cultural Coordinator, Cahuilla Band of Indians; Ray Chapparosa, Chairperson, Los Coyotes Band of Cahuilla and Cupeño Indians; Denisa Torres, Cultural Resources Manager, Morongo Band of Mission Indians, and Cupeño Indians; and Denisa Torres, Cultural Resources Manager, Morongo Band of Mission Indians ; Molly Earp Escobar, Cultural Planning Specialist, Pechanga Band of Luiseño Indians; John Gomez Jr., Cultural Resource Coordinator, Ramona Band of Cahuilla Indians; Cheryl Madrigal, Tribal Historic Preservation Officer, Rincon Band of Luiseño Indians; Mercedes Estrada, Tribal Administrative Assistant, Santa Rosa Band of Cahuilla Indians; and Joseph Ontiveros, Tribal Historic Preservation Officer, Soboba Band of Luiseño Indians (see Table 3.13-1). This coordination was conducted for informational purposes only and does not necessarily constitute formal government-to-government consultation as specified by AB 52. AB 52 consultation efforts conducted by March JPA are discussed in the paragraphs following the table.

Table 3.13-1. Native American Coordination

Native American Tribal Representative	Response to Initial Tribal Outreach Letters Sent May 1, 2020 (Method)
Mercedes Estrada, Tribal Administrative Assistant, Santa Rosa Band of Cahuilla Indians	No comments regarding the Proposed Project (telephone).
Denisa Torres, Cultural Resources Manager, Morongo Band of Mission Indians	The $\underbrace{\mathbb{T}}_{r}$ ribe noted the presence of prehistoric bedrock milling features within a 5-mile radius of the APE but did not make a specific request or recommendation (email).
Bobby Ray Esparza, Cultural Coordinator, Cahuilla Band of Indians	The $\underbrace{\mathbb{T}}_{r}$ ribe requested that ground-disturbing activities in the APE be monitored by a representative of the Cahuilla Band (email).
Cheryl Madrigal, Tribal Historic Preservation Officer, Rincon Band of Luiseño Indians	The <code>t_T</code> ribe stated that they had no knowledge of any cultural resources in the APE and requested to review the results of the historical/archaeological resources records search (email).
Joseph Ontiveros, Tribal Historic Preservation Officer, Soboba Band of Luiseño Indians	The <code>tI</code> ribe reported that multiple areas of potential impact were identified during an in-house database search and requested further consultation with March JPA and FAA. Furthermore, the <code>tI</code> ribe requested that ground-disturbing activities in the APE be monitored by a representative of the Soboba Band (email).
Ray Chapparosa, Chairperson, Los Coyotes Band of Cahuilla and Cupeño Indians	No response.
Molly Earp-Escobar, Cultural Planning Specialist, Pechanga Band of Luiseño Indians	No response.
John Gomez Jr., Cultural Resource Coordinator, Ramona Band of Cahuilla Indians	No response.

Notes: APE = area of potential effects; JPA = Joint Powers Authority; FAA = Federal Aviation Administration.

Assembly Bill 52 Consultation

The Proposed Project is subject to compliance with AB 52 (PRC Section 21074), which requires consideration of impacts to TCRs as part of the CEQA process, and that the lead agency notify California Native American tribal representatives who have requested notification and who are traditionally or culturally affiliated with the geographic area of a project. All NAHC-listed California Native American tribal representatives who have requested project notification pursuant to AB 52 were sent letters by March JPA on August 19, 2020 (see Table 3.13-2). The letters contained a project description, an outline of AB 52 timing, a request for consultation, and contact information for the appropriate lead agency representative. The request for tribal consultation window under AB 52 closed on September 18, 2020.

Responses providing a formal request to begin consultation were received by March JPA staff on August 28, 2020, from the Pechanga Band of Luiseño Indians; September 3, 2020, from the Rincon Band of Luiseño Indians; September 17, 2020, from the Agua Caliente Band of Cahuilla Indians; and October 6, 2020, from the Soboba Band of Luiseño Indians. A response was received by March JPA staff on August 20, 2020, from the Quechan Tribe of the Fort Yuma Reservation, stating that the tribe had no comments and would defer to the more local tribes. A response was received by March JPA staff on August 19, 2020, from the San Manuel Band of Mission Indians stating

that the tribe had no concerns over the Proposed Project implementation. The tribe provided a list of mitigation measures/conditions of approval in its response and requested that the language be included as part of the Proposed Project. No other responses were received. Documents related to AB 52 consultation are on file with March JPA.

Table 3.13-2. Assembly Bill 52 NAHC-Listed Native American Contacts

Native American Tribal Representatives	Tribe
Jeff Grubbe, Chairperson	Agua Caliente Band of Cahuilla Indians
Amanda Vance, Chairperson	Augustine Band of Cahuilla Mission Indians
Doug Welmas, Chairperson	Cabazon Band of Mission Indians
Daniel Salgado, Chairperson	Cahuilla Band of Indians
Ralph Goff, Chairperson	Campo Band of Mission Indians
Robert Pinot, Chairperson	Ewiiaapaayp Tribal Office
Michael Garcia, Vice Chairperson	Ewiiaapaayp Tribal Office
Andrew Salas, Chairperson	Gabrieleño Band of Mission Indians-Kizh Nation
Anthony Morales, Chairperson	Gabrieleño-Tongva San Gabriel Band of Mission Indians
Sandonne Goad, Chairperson	Gabrieleño-Tongva Nation
Robert Dorame, Chairperson	Gabrieleño Tongva Indians California Tribal Council
Charles Alvarez	Gabrieleño-Tongva Tribe
Matias Belardes, Chairperson	Juaneño Band of Mission Indians Acjachemen Nation- Belardes
Javaughn Miller, Tribal	La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson	La Posta Band of Mission Indians
Shane Chapparosa, Chairperson	Los Coyotes Band of Mission Indians
Angela Elliott Santos, Chairperson	Manzanita Band of Kumeyaay Nation
Michael Linton, Chairperson	Mesa Grande Band of Diegueño Mission Indians
Robert Martin, Chairperson	Morongo Band of Mission Indians
Mark Macarro, Chairperson	Pechanga Band of Luiseño Indians
Jill McCormick, Historic Preservation Officer	Quechan Tribe of the Fort Yuma Reservation
Joseph Hamilton, Chairperson	Ramona Band of Cahuilla Mission Indians
Bo Mazzetti, Chairperson	Rincon Band of Luiseño Indians
Cheryl Madrigal, Tribal Historic Preservation Officer	Rincon Band of Luiseño Indians
Jessica Mauck, Director of Cultural Resources	San Manuel Band of Mission Indians
Steven Estrada, Chairperson	Santa Rosa Band of Mission Indians
Scott Cozart, Chairperson	Soboba Band of Luiseño Indians
Cody J. Martinez, Chairperson	Sycuan Band of the Kumeyaay
Thomas Tortez, Chairperson	Torres-Martinez Desert Cahuilla Indians

Note: NAHC = Native American Heritage Commission.

Responses providing a formal request to begin consultation were received by March JPA staff on August 28, 2020, from the Pechanga Band of Luiseño Indians; September 3, 2020, from the Rincon Band of Luiseño Indians; September 17, 2020, from the Agua Caliente Band of Cahuilla Indians; and October 6, 2020, from the Soboba Band of Luiseño Indians. A response was received by March JPA staff on August 20, 2020, from the Quechan Tribe of the Fort Yuma Reservation, stating that the Tribe had no comments and would defer to the more local Tribes. A response was received by March JPA staff on August 19, 2020, from the San Manuel Band of Mission Indians

stating that the Tribe had no concerns over the Proposed Project's implementation. The Tribe provided a list of mitigation measures/conditions of approval in its response and requested that the language be included as part of the Proposed Project. No other responses were received. A summary of the consultation is documented in Table 3.13-3. Documents related to AB 52 consultation are on file with MIPAA.

Table 3.13-3. Native American Coordination

Consulting Tribes	Consultation Summary
Agua Caliente Band of Cahuilla Indians	October 22, 2020: March JPA email to Patricia Garcia Plotkin, Agua Caliente, to initiate consultation and provides link to paleo/archaeological reports.
Jeff Grubbe, Chairperson	December 2, 2020: Consultation initiated. March JPA staff presents Proposed Project to Agua Caliente.
	March 30, 2021: March JPA email notifying Agua Caliente of NOP/IS and scoping meeting for the Proposed Project. Email read receipt confirmed, April 6, 2021.
	May 30, 2024: Agua Caliente comments letter requesting revisions to Section 3.13, Tribal Cultural Resources, of EIR.
<u>Pechanga Band of Luiseño</u> <u>Indians</u>	September 29, 2020: March JPA email to Ebru Ozdil and Juan Ochoa to initiate consultation and provides link to Proposed Project plans/documents. Pechanga
Mark Macarro, Chairperson	requested to review copies of any archaeological, cultural, biological, geotechnical reports as well as conceptual grading plans before scheduling consultation.
	September 30, 2020: March JPA email to Ebru Ozdil and Juan Ochoa providing link to paleo/archaeological reports. Missing geotechnical report and initial consultation is pending.
	November 16, 2020: Consultation initiated. March JPA staff presents Proposed Project to Pechanga.
	March 30, 2021: March JPA email, notifying Pechanga of NOP/IS and scoping meeting for the Proposed Project. Email read receipt confirmed, March 31, 2021.
	November 22, 2024: Pechanga submitted comments regarding mitigation measures and Section 3.13, Tribal Cultural Resources, of EIR.
Rincon Band of Luiseño Indians	September 29, 2020: March JPA email to Cheryl Madrigal to initiate consultation and provided link to Proposed Project plans/documents.
Bo Mazzetti, Chairperson	September 30, 2020: March JPA email to Cheryl Madrigal providing link to paleo/archaeological reports.
	October 21, 2020: Phone consultation, presentation held with Cheryl Madrigal. Rincon requested:
	1. Rincon Band of Luiseno Indians, to be included in the National Environmental Policy Act (NEPA) Section 106 Consultation.
	2. Opportunities for joint consultation with other Tribes.3. See Mitigation Measures/Conditions of Approval for the Proposed Project.
	4. See Geotechnical Report when available. March 30, 2021: March JPA email notifying Rincon of NOP/IS and scoping
·	meeting for the Proposed Project. Email read receipt confirmed March 31, 2021.
Soboba Band of Luiseño Indians	October 6, 2020: March JPA received response via email that the Tribe had received notification of the Project. March JPA email to Joseph Ontiveros and
Scott Cozart, Chairperson	Jessica Valdez to initiate consultation and provide link to Proposed Project

Table 3.13-3. Native American Coordination

<u>Consulting Tribes</u>	Consultation Summary
	plans/documents, including paleo/archaeological reports. Initial consultation pending.
	November 4, 2020: Consultation initiated. March JPA staff presented Proposed Project to Soboba. Joseph Ontiveros communicated the presence of the TCRs in the project site's vicinity.
	March 30, 2021: March JPA email notifying Soboba of NOP/IS and scoping meetings for the Proposed Project. Email read receipt not received.
	January 28, 2025: March JPA and Dudek call with Joseph Ontiveros. He requested several changes to Section 3.13, Tribal Cultural Resources, of EIR and to review updated mitigation measures. He also communicated the presence of
	the previously discussed TCRs in the project site's vicinity.

3.13.2 Existing Conditions

Ethnographic Setting

According to current ethnohistorical scholarship, the traditional territories of several Native American groups, including the Luiseño, the Serrano, the Gabrieleño, and the Cahuilla, overlapped one another in the present-day Riverside/San Bernardino region during the Late Prehistoric Period, but the Moreno Valley area is generally recognized as part of the traditional homeland of the Luiseño, a Takic-speaking people whose territory extended from present-day Riverside to Escondido and Oceanside, California. The name of the group derived from Mission San Luis Rey, which held jurisdiction over most of the traditional Luiseño territory during the late eighteenth and early nineteenth centuries (Appendix E; Bean and Shipek 1978).

Anthropologists have divided the Luiseño into several autonomous lineages or kin groups that represent the basic political unit among most Native Americans in Southern California. Each Luiseño lineage possessed a permanent base camp, or village, on the valley floor and another in the mountain regions for acorn collection. Luiseño villages were made up of family members and relatives, the chiefs inherited their positions, and each village owned its own land. Villages were usually located in sheltered canyons or near year-round sources of fresh water, always near subsistence resources (Appendix E; Bean and Shipek 1978).

The Luiseño exploited nearly all resources of the environment in a highly developed seasonal mobility system. Primarily hunters and gatherers, they collected seeds, roots, wild berries, acorns, wild grapes, strawberries, wild onions, and prickly pear cacti, and hunted deer, elk, antelope, rabbit, wood rats, and a variety of insects. Bows and arrows, atlatls or spear throwers, rabbit sticks, traps, nets, clubs, and slings were the main hunting tools. Each lineage had exclusive hunting and gathering rights in their procurement ranges. These boundaries were respected and crossed only with permission (Appendix E; Bean and Shipek 1978).

The traditional Cahuilla territory included most of central Southern California. The territory was bounded by the San Bernardino Mountains to the north, Borrego Springs and the Chocolate Mountains to the south, the Colorado Desert to the east, the San Jacinto Plain to the west, and the Palomar Mountains to the east. The Cahuilla are subdivided into three geographical divisions: the Mountain Cahuilla, Western Cahuilla, and Desert Cahuilla. The Mountain Cahuilla and Western Cahuilla lived closest to the current project site (Kroeber 1925). The distinctions between the

Mountain Cahuilla, Western Cahuilla, and Desert Cahuilla are believed to be largely geographic, although linguistic and cultural differences may have existed to varying degrees (Strong 1929). The Cahuilla were divided into two moieties named tūktum (Wildcats) and istam (Coyotes) (Strong 1929; Bean 1972).

It is estimated that when Spanish colonization of Alta California began in 1769, the Luiseño had approximately 50 active villages with an average population of 200 individuals each (for a total population of approximately 10,000), although other estimates place the total Luiseño population at 4,000 to 5,000. Some of the villages were forcibly moved to the Spanish missions, but others were left largely intact. Ultimately, the Luiseño population declined rapidly after European contact because of diseases such as smallpox as well as harsh living conditions at the missions and, later, on the Mexican ranchos, where the native people often worked as seasonal ranch hands (Appendix E; Bean and Shipek 1978).

After the annexation of Alta California by the United States, the large number of non-native settlers further eroded the foundation of traditional Luiseño society. During the latter half of the nineteenth century, almost all remaining Luiseño villages were displaced and their occupants eventually removed to various reservations. Today, the nearest Native American groups of Luiseño heritage live on the Soboba, Pechanga, and Pala Indian Reservations.

CHRIS Records Search

CRM TECH completed a California Historical Resources Information System (CHRIS) search at the Eastern Information Center for the APE and surrounding 1 mile radius on June 8, 2020, for the Proposed Project (Appendix E). The APE used to determine the locations within the 1 mile radius for the CHRIS records search is shown in Figure 3.4.1, Area of Potential Effects for Cultural Resources (see Section 3.4, Cultural Resources). This search included mapped prehistoric, historical, and built environment resources, and properties designated as California Historical Landmarks, Points of Historical Interest, or Riverside County Landmarks. Additional consulted sources included the National Register of Historic Places (NRHP), the CRHR, and the California Historical Resources Inventory.

The Eastern Information Center records search for the Proposed Project indicated that 31 technical studies have been previously conducted within 1 mile of the Proposed Project's APE between the mid 1990s and 2016, which collectively cover roughly 70% of the land within the records search scope, mostly within the boundaries of March ARB. Of these 31 studies, 4 partially or entirely overlap the APE. Of these 4 studies, 3 were large scale studies conducted on the entire area of the former March Air Force Base in preparation for its realignment in the mid 1990s. The most recent study among these 4, which was completed in 2016, did not include the westernmost portion of the current APE. During that study, a drainage channel within the APE was recorded in the California Historical Resources Inventory and designated as Site 33 024853. As a result of the records search, 9 additional historical/archaeological sites and 1 isolate were identified within 1 mile of the APE.

The previously recorded resources are historical in age and consist of the Atchison, Topeka, and Santa Fe Railway; two flood control channels; structural remains from the World War II-era Camp Haan; and refuse deposits. Several of the sites were remains of facilities from the earlier March Air Force Base. Other than Site 33 024853, all the recorded resources were found at least 0.5 miles from the APE. Therefore, none of them required further consideration during preparation of the Historic Resources Report (Appendix E).

3.13.23 Relevant Plans, Policies, and Ordinances

Federal

There are no federal plans, policies, or ordinances related to TCRs that are relevant to the Proposed Project.

Authority to withhold information. Section 304 of the National Historic Preservation Act provides that the head of a federal agency or other public official receiving grant assistance pursuant to the act, after consultation with the Secretary, shall withhold from public disclosure information about the location, character, or ownership of a historic property when disclosure may cause a significant invasion of privacy; risk harm to the historic property; or impede the use of a traditional religious site by practitioners. When the head of a federal agency or other public official has determined that information should be withheld from the public pursuant to these criteria, the Secretary, in consultation with such federal agency head or official, shall determine who may have access to the information for the purposes of carrying out the act (36 CFR Section 800.11 [c][1]).

State

California State Assembly Bill 52

AB 52 was approved by Governor Jerry Brown on September 25, 2014. AB 52 amended California Public Resources Code (PRC) Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. PRC Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American tribe. A TCR is defined as follows (PRC Section 21074):

- (a) "Tribal cultural resources" are either of the following:
 - (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
 - (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1 In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
- (b) A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
- (c) A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a "nonunique archaeological resource" as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

AB 52 formalizes the lead agency/tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with a project region, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or EIR. Section 1(b)(9) of AB 52 establishes that "a substantial adverse change to a tribal cultural resource has a significant effect on the environment." Effects on TCRs should be considered under CEQA. Section 6 of AB 52 adds PRC Section 21080.3.2, which states that parties may propose mitigation measures "capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource." Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to TCRs, the consultation must include those topics (PRC Section 21080.3.2[a]). Any mitigation measures agreed upon in the consultation are recommended for inclusion in the environmental document and the mitigation monitoring and reporting program (where applicable) (PRC Section 21082.3[a]).

AB 52 requires that any information—not just documents—submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public consistent with California Government Code Sections 7927.000 and 7927.005 (PRC Section 21082.3[c][1]).

California Register of Historical Resources

In California, the term *historical resource* includes "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (PRC Section 5020.1[j]). In 1992, the California legislature established the CRHR "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Section 5024.1[a]). According to PRC Section 5024.1(c), a resource may be listed as an historical resource in the CRHR if it meets at least one of the following criteria:

- 1 Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- 2 Is associated with the lives of persons important in our past.
- 3 Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- 4 Has yielded, or may be likely to yield, information important in prehistory or history.

To understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 CCR 4852[d][2]).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are State Landmarks and Points of Interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

California Health and Safety Code Section 7050.5; California Public Resources Code Section 5097.98

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains can occur until the County Coroner has examined the remains (California Health and Safety Code Section 7050.5[b]). PRC Section 5097.98 also outlines the process to be followed in the event that Native American remains are discovered. If the Coroner determines or has reason to believe the remains are those of a Native American, the Coroner must contact NAHC within 24 hours (California Health and Safety Code Section 7050.5[c]). NAHC will notify the "most likely descendant." With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

PRC Section 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes NAHC to resolve disputes regarding the disposition of such remains. PRC Section 5097.98 has been incorporated into Section 15064.5(e) of the CEQA Guidelines. The Proposed Project would be required to comply with PRC Section 5097.98 should any unknown human remains be discovered during site disturbance.

California Public Resources Code, Sections 5097.5 and 30244

PRC Section 5097.5 prohibits "knowing and willful" removal, destruction, injury, defacement, or excavation upon any historic or prehistoric ruins, burial grounds, or archaeological or vertebrate paleontological site situated on public lands (lands under state, county, city, district, or public authority ownership or jurisdiction, or the ownership or jurisdiction of a public corporation), except where the agency with jurisdiction has granted express permission. PRC Section 30244 requires reasonable mitigation for impacts on archaeological or paleontological resources that occur as a result of development.

Local

There are no local plans, policies, or ordinances related to TCRs that are relevant to the Proposed Project.

3.13.34 Thresholds of Significance

The significance criteria used to evaluate the Proposed Project's impacts to TCRs are based on Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) and, as applicable, the March JPA CEQA Guidelines (March JPA 2022). According to the CEQA Guidelines, for the purposes of this EIR a significant impact related to TCRs would occur if the Proposed Project would:

TCR-1

Cause a substantial adverse change in the significance of a tribal cultural resource <u>Tribal</u> <u>Cultural Resource</u>, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of

the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.13.45 Impacts Analysis

NOTE: Revisions to the TCR-1 impact analysis below were requested by the Tribes during consultation and do not represent a new significant impact not identified in the Draft EIR. Through consultation with the Tribes, added mitigation clarifies the monitoring protocol process and does not identify new impacts. The mitigation measures fall in line with an extension of the original tribal cultural resources mitigation reflecting refinement of the regulatory body and further defining the tribal cultural resources process.

Threshold TCR-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074, as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Less-Than-Significant Impact_with Mitigation Incorporated. As described in Section 3.4.1 3.13.1, Existing Conditions, a California Historical Resources Information System (CHRIS) records search was conducted at the Eastern Information Center on June 8, 2020, for the Proposed Project's APE (Appendix E) and within a 1-mile buffer around the APE. No Native American cultural resources were identified within the Proposed Project's APE as a result of the CHRIS records search. To date, government-to-government consultation initiated by March JPA has not identified any geographically defined TCRs as intersecting the project site, but TCRs have been defined in the broader region. In consideration of the broader landscape, mitigation measures have been included that reflect this consultation, as follows: Mitigation Measure (MM) TCR-1 (Tribal Monitoring; refer to Section 3.13.6, Mitigation Measures, for the full text of all TCR mitigation measures) is included as part of the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities; MM-CUL-1 (Archaeological Monitoring; refer to Section 3.4, Cultural Resources, for the full text of all cultural resources mitigation measures) provides for archaeological monitoring of all initial ground-disturbing activities; MM-TCR-2 (Final Disposition) provides protocols for the treatment of inadvertent discoveries of Tribal resources and human remains; MM-TCR-3 (Discovery of Human Remains) provides protocols for dealing with inadvertent discovery of human remains; and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training. With implementation of these mitigation measures,

resulted in the identification of a TCR within or near the project site. No TCRs have been identified by California Native American tribes as part of March JPA's AB 52 notification and consultation process. Impacts would be less than significant with mitigation incorporated.

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

Less-Than-Significant Impact with Mitigation Incorporated. As discussed for Threshold TCR-1(i), no-several TCRs have been identified by California Native American tribes through the AB 52 consultation process in the vicinity of the project site, but and to date, there have been no TCRs identified within the Proposed Project's APE that have been determined by MIPAAMarch JPA to be significant pursuant to the criteria set forth in PRC Section 5024.1. However, in consideration of the known sensitivity of the project site for cultural resources, the Cahuilla Band of Indians and the Soboba Band of Luiseño Indians were contacted during the AB 52 process and the tTribes requested monitoring. Mitigation Measure (MM)-TCRCUL-1 (Archaeological and Tribal Monitoring: see Section 3.4, Cultural Resources) is included as part of the Proposed Project to provide for archaeological and tribal monitoring for all initial ground-disturbing activities, MM-TCR-2 provides protocols for the treatment of inadvertent discoveries of tribal resources and human remains, MM-TCR-3 (Discovery of Human Remains) provided protocol for dealing with inadvertent discovery of human remains, MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires including cultural/historical sensitivity training, and MM-TCR-4 (Non-Disclosure) restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. With implementation of MM-TCR-UL-1, MM-TCR-2, MM-CUL-3, and MM-TCR-4, impacts would be less than significant with mitigation incorporated.

3.13.<u>56</u> Mitigation Measures

The following mitigation measures would be implemented to reduce potentially significant impacts to TCRs from implementation of the Proposed Project:

MM-TCR-1

Tribal Monitoring. Prior to issuance of a grading permit, the project applicant shall retain a qualified tribal monitor to monitor all initial ground-disturbing activities, including, but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition. The applicant shall secure an agreement with the Tribe (or Tribes) for tribal monitoring. The applicant shall submit a copy of a signed contract between the Tribe (or Tribes) and the landowner/applicant for the monitoring of the Proposed Project to March Air Reserve Base (ARB) and the March Inland Port Airport Authority (MIPAA) Director. The applicant shall provide a minimum of 30 days' advance notice to the Tribe (or Tribes) of all mass grading and trenching activities. The tribal monitor(s) shall oversee monitoring for all initial ground-disturbing activities and excavation of each portion of the project site, including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition, etc. The tribal monitor(s) shall have the authority to temporarily divert, redirect, or halt

the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with the Project Archaeologist and MIPAA.

- MM-TCR-2 Final Disposition. In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:
 - A. One or more of the following treatments, in order of preference, shall be employed with the Tribes. Evidence of such shall be provided to MIPAA:
 - Preservation in place of the cultural resources, if feasible. Preservation in place means
 avoiding the resources, leaving them in the place where they were found with no
 development affecting the integrity of the resources.
 - 2. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with MIPAA under a confidential cover and not subject to Public Records Request.
 - 3. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources, ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to MIPAA. There shall be no destructive or invasive testing on sacred items, burial goods, or Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to MIPAA upon the completion of a treatment plan and final report detailing the significance and treatment finding.

hours. In accordance with California Public Resources Code Section 5097.98, NAHC shall immediately notify those persons it believes to be the most likely descendants (MLDs) of the

MM-TCR-3 Discovery of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the project contractor shall immediately halt work and contact the Riverside County Coroner to evaluate the discovery. The contractor shall also notify March Air Reserve Base (ARB) and March Inland Port Airport Authority (MIPAA). No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) within 24

deceased Native American. The MLDs shall complete their inspection within 48 hours of being granted access to the site. The MLDs shall then determine, in consultation with the property owner or their representative, the disposition of the human remains. Authorization to resume construction shall be given by March ARB and MIPAA only after consultation with the MLDs and shall include implementation of all appropriate measures to protect any possible burial sites and/or human remains.

MM-TCR-4

Non-Disclosure. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and lead agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.

The following measures, provided in full in Section 3.4.5, Mitigation Measures, of the Cultural Resources section (Section III.3.4.3, above, of the Final EIR), shall also be implemented to reduce impacts to TCRs:

- MM-CUL-1 (Archaeological and Tribal Monitoring)
- MM-CUL-3 (Cultural Resources Worker Sensitivity Training)

3.13.67 Level of Significance after Mitigation

With implementation of the following mitigation measures, the potential impacts to TCRs would be reduced to less than significant with mitigation incorporated: MM-TCR-1, which requires tribal monitoring during all initial ground-disturbing activities; MM-CUL-1, which provides archaeological monitoring during all initial ground-disturbing activities; MM-TCR-2, which provides protocols for the treatment of inadvertent discoveries of tribal resources and human remains; MM-TCR-3, which provides protocols for dealing with inadvertent discovery of human remains; MM-CUL-3, which requires cultural resources sensitivity training for construction workers; and MM-TCR-4, which restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. With implementation of MM-CUL-1, which requires archaeological and tribal monitoring during all initial ground disturbing activities, potential impacts to TCRs would be reduced to less than significant with mitigation incorporated.

3.13.78 Cumulative Effects

The geographical area evaluated for cumulative impacts to TCRs encompasses areas within jurisdictions in the vicinity of the project site, including MIPAAMarch JPA; the County of Riverside; and the Cities of Perris, Moreno Valley, and Riverside. As future growth occurs within the jurisdictions in the project site vicinity, impacts to TCRs could occur due to the potential for development to disturb or impact known or unknown TCRs in the area. Cumulative impacts to TCRs would occur if the Proposed Project, in combination with related projects (as identified in Table 3-1, Cumulative Projects, in Chapter 3 of this Draft-EIR), would affect TCRs. As discussed herein, the Proposed Project would not result in significant impacts to TCRs with implementation of MM-TCR-1, MM-CUL-1, MM-TCR-2, MM-TCR-3, MM-CUL-3, and MM-TCR-4; therefore, the Proposed Project would not result in or contribute to cumulative significant impacts to TCRs. Cumulative impacts would be less than significant with mitigation incorporated.

3.13.89 References Cited

- Bean, L.J. 1972. *Mukat's People: The Cahuilla Indians of Southern California*. Berkeley: University of California Press.
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- Strong, W.D. 1929. Aboriginal Society in Southern California. University of California Publications in American Archaeology and Ethnology 26. Berkeley: University of California Press.

III.3.5 Changes to Chapter 5, Alternatives

Addition of new alternatives (Alternative 5 – Reduced Operation/No Nighttime Flights Alternative; Alternative 6 – Reduced Aviation Noise Alternative)

NOTE: These new alternatives were developed in response to comments raising concerns on various aspects of the Proposed Project, specifically aviation noise and nighttime flights. Because the added text includes tables, to avoid renumbering the subsequent tables in Chapter 5, these tables have been numbered "5-A" through "5-D." Alternatives analysis for Cultural Resources and Tribal Cultural Resources have been revised to reflect the clarified and renumbered mitigation measures. The Energy analysis for Alternatives 3 and 4 were corrected to reflect fuel consumption disclosed in Appendices S-1 and S-2. Sections 5.4.6 and 5.4.7 have been added in its entirety to the EIR; therefore, **no strikeout/underline is used in the text of those sections**.

III.3.5.1 Section 5.4, Alternatives Under Consideration

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Once operational, Alternative 4 would accommodate private aircraft, rather than commercial aircraft, in contrast to the Proposed Project. In addition, because there would be no air cargo facility constructed under this alternative, no air cargo would be transported to or from the project site, eliminating the movement of goods-distribution trucks to and from the project site. However, personal vehicle trips would be added for passengers of the private aircraft, and the anticipated number of employees would be 52, resulting in a reduction of employees compared to the Proposed Project. Annual flights under Alternative 4 would remain the same as the Proposed Project; however, flight operations would not occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations).

Alternative 5: Reduced Operation/No Nighttime Flights Alternative

Under Alternative 5, the Reduced Operation/No Nighttime Flights Alternative, buildout of the project site would occur in an identical manner to the Proposed Project. Thus, Alternative 5 would result in the development of the Air Cargo Center Component and the Off-Site Component, as discussed in Chapter 2, Project Description. The cargo building and all proposed taxiway and aircraft parking apron improvements, utility improvements, landscaping, and internal driveways/parking lots, as well as the work within the right-of-way along Heacock Street, would be

constructed in the exact same manner as the Proposed Project. In addition, all off-site work planned under the Proposed Project, including the work to be completed in Work Areas 1–5, would occur under this alternative.

The operational aspects of the cargo building would remain the same as those identified for the Proposed Project. However, under Alternative 5, annual flight operations would be reduced by 10%, resulting in total annual operations of 9,548 flight operations. Additionally, under Alternative 5, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Thus, flight operations under Alternative 5 would occur only from 7:00 a.m. to 10:00 p.m. Alternative 5 is anticipated to have a maximum of 15 flights per day, 6 days a week (non-peak), as shown in Table 5-A. Operation of the air cargo center would similarly be reduced by 10%.

Table 5-A. Alternative 5 Aircraft Flight Operations

Maximum Daily Operatio	<u>ns</u>	Total Maximum Daily Flight Operations	Total Maximum Daily Flights
Non-Peak Season			
<u>Arrivals</u>		<u>15</u>	<u>15</u>
<u>Day</u>	<u>13</u>		
<u>Evening</u>	<u>2</u>		
<u>Night</u>	<u>0</u>		
<u>Departures</u>		<u>15</u>	
<u>Day</u>	<u>2</u>		
<u>Evening</u>	<u>13</u>		
<u>Night</u>	<u>0</u>		
Peak Season			
<u>Arrivals</u>		<u>20</u>	<u>20</u>
<u>Day</u>	<u>14</u>		
<u>Evening</u>	<u>6</u>		
<u>Night</u>	<u>0</u>		
<u>Departures</u>		<u>20</u>	
<u>Day</u>	<u>7</u>		
<u>Evening</u>	<u>13</u>		
<u>Night</u>	<u>0</u>		

As shown in Table 5-B below, in comparison to the Proposed Project, Alternative 5 removes approximately 500 annual nighttime flights. These approximately 500 nighttime flight operations were shifted into the daytime hours, which is why the daytime annual reduction is not 10%.

Table 5-B. Comparison of Proposed Project and Alternative 5 Flight Operations

	Non-Peak Daily Flight Operations	Peak Daily Flight Operations	Annual Daytime Flight Operations	Annual Evening Flight Operations	Annual Nighttime Flight Operations	Total Annual Flight Operations
Proposed Project	<u>34</u>	<u>44</u>	<u>5361</u>	<u>4744</u>	<u>503</u>	<u>10,608</u>
Alternative 5	<u>30</u>	<u>40</u>	<u>5278</u>	<u>4271</u>	<u>0</u>	<u>9,548</u>
<u>Difference</u>	<u>-4</u>	<u>-4</u>	<u>-83</u>	<u>-473</u>	<u>-503</u>	<u>-1,060</u>
Percent change	<u>-11.8%</u>	<u>-9%</u>	<u>-1.6%</u>	<u>-10%</u>	<u>-100%</u>	<u>-10%</u>

Alternative 6 - Reduced Aviation Noise Alternative

Under Alternative 6, the Reduced Aviation Noise Alternative, buildout of the project site would occur in an identical manner to the Proposed Project. Thus, Alternative 6 would result in the development of the Air Cargo Center Component and the Off-Site Component, as discussed in Chapter 2, Project Description. The cargo building and all proposed taxiway and aircraft parking apron improvements, utility improvements, landscaping, and internal driveways/parking lots, as well as the work within the right-of-way along Heacock Street, would be constructed in the exact same manner as the Proposed Project. In addition, all off-site work planned under the Proposed Project, including the work to be completed in Work Areas 1–5, would occur under this alternative.

The operational aspects of the cargo building would remain the same as those identified for the Proposed Project. However, under Alternative 6, annual flight operations would be reduced by approximately 30%, resulting in total annual operations of 7,488 flight operations. Flight operations would occur between 7:00 a.m. and 10:00 p.m. Alternative 6 restricts a higher percentage of flight operations to daytime hours (7:00 a.m. to 7:00 p.m.) than the Project. Additionally, under Alternative 6, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Alternative 6 forgoes the Proposed Project's non-peak/peak flight distribution. Alternative 6 is anticipated to have a maximum of 12 flights per day, 6 days a week, as shown in Table 5-C. Operation of the air cargo center would similarly be reduced by approximately 30%.

Table 5-C. Alternative 6 Flight Operations

Maximum Daily Operation	<u>ns</u>	Total Maximum Daily Flight Operations	<u>Total Maximum Daily</u> <u>Flights</u>
<u>Arrivals</u>		<u>12</u>	<u>12</u>
<u>Day</u>	<u>10</u>		
<u>Evening</u>	<u>2</u>		
<u>Night</u>	<u>O</u>		
<u>Departures</u>		<u>12</u>	
<u>Day</u>	<u>7</u>		
<u>Evening</u>	<u> 5</u>		
<u>Night</u>	<u>0</u>		

As shown in Table 5-D below, in comparison to the Proposed Project, Alternative 6 removes approximately 500 annual nighttime flight operations and 54% of annual flight operations in the evening hours (7:00 p.m. to 10:00 p.m.).

Table 5-D. Comparison of Proposed Project and Alternative 6 Flight Operations

	Non-Peak Daily Flight Operations	Peak Daily Flight Operations	Annual Daytime Flight Operations	Annual Evening Flight Operations	Annual Nighttime Flight Operations	<u>Total Annual Flight</u> <u>Operations</u>
Proposed Project	34	44	5,361	4,744	503	10,608
Alternative 6	24	24	5,304	2,184	0	7,488
<u>Difference</u>	-10	-20	-57	-2,560	-503	-3,120
Percent change	-29.4%	-45.5%	-1.1%	-54%	-100%	-29.4%

Pages 5-4 and 5-5

Table 5-1. Comparison of Impacts from the Proposed Project and Alternatives

Environmental Topic	Proposed Project	Alternative 1 No Project Alternative	Alternative 2 Nighttime Flight Noise Reduction Alternative	Alternative 3 Reduced Flight Operations Alternative	Alternative 4 Private Aircraft Services Alternative	Alternative 5 Reduced Operation/ No Nighttime Flights Alternative	Alternative 6 Reduced Aviation Noise Alternative
Aesthetics	LTS	▼	▼	V	V	<u></u>	<u>▼</u>
		No impact	LTS	LTS	LTS	<u>LTS</u>	<u>LTS</u>
Air Quality	SUI	▼	=	▼	▼	<u></u>	<u></u>
	(operational VOC, NOx, CO)	No impact	SUI	SUI	LTS	<u>SUI</u>	<u>SUI</u>
Biological	LTS + mitigation	▼	=	=	=	<u>=</u>	=
Resources		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation
Cultural Resources	LTS + mitigation	▼	=	=	=	<u>=</u>	=
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation
Energy	LTS	▼	=	▼	▼	<u></u>	<u></u>
		No impact	LTS	LTS	LTS	<u>LTS</u>	<u>LTS</u>
Geology and Soils	LTS + mitigation	▼	=	=	=	=	=
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	LTS + mitigation
Greenhouse Gas	LTS + mitigation	▼	=	▼	▼	<u></u>	<u></u>
Emissions		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	LTS + mitigation
Hazards/Hazardous	LTS + mitigation	▼	=	▼	▼	<u>▼</u>	<u>▼</u>
Materials		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	LTS + mitigation
Hydrology/Water	LTS + mitigation	▼	=	=	=	=	=
Quality		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	LTS + mitigation
Land Use/Planning	LTS + mitigation	▼	=	=	=	≣	=
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	<u>LTS + mitigation</u>	LTS + mitigation
Noise	SUI	▼	▼	▼	▼	<u></u>	<u>▼</u>
	(aviation noise)	No impact	SUI	SUI	LTS	<u>SUI</u>	<u>LTS + mitigation</u>
Transportation	LTS + mitigation	▼	=	▼	▼	<u></u>	<u></u>
		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation

Table 5-1. Comparison of Impacts from the Proposed Project and Alternatives

Environmental Topic	Proposed Project	Alternative 1 No Project Alternative	Alternative 2 Nighttime Flight Noise Reduction Alternative	Alternative 3 Reduced Flight Operations Alternative	Alternative 4 Private Aircraft Services Alternative	Alternative 5 Reduced Operation/ No Nighttime Flights Alternative	Alternative 6 Reduced Aviation Noise Alternative
Tribal Cultural	LTS + mitigation	▼	=	=	=	≣	<u>=</u>
Resources		No impact	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation	LTS + mitigation
Utilities/Service	LTS	▼	=	▼	▼	<u></u>	<u></u>
Systems		No impact	LTS	LTS	LTS	<u>LTS</u>	<u>LTS</u>

Notes: LTS = less than significant; SUI = significant and unavoidable; LTS + mitigation = less than significant with mitigation incorporated.

Green = No impact or less than significant; Yellow = less than significant with mitigation incorporated; Red = significant and unavoidable.

[▲] Impacts would be greater than those of the Proposed Project.

⁼ Impacts would be comparable to those of the Proposed Project.

[▼] Impacts would be reduced compared to those of the Proposed Project.

Alternative 1, Subheading "Cultural Resources"

Page 5-8

As discussed in Section 3.4, Cultural Resources, buildout of the Proposed Project would result in less-thansignificant impacts to archaeological resources with implementation of MM-CUL-1 (Archaeological and Tribal Monitoring), which requires a tribal monitor archaeological monitoring during all initial ground-disturbing activities; and development of a Cultural Resource Monitoring and Treatment Plan (CRMTP), and MM CUL 2 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find. In addition, MM-CUL-2 (CRMTP), which requires the Principal Investigator, in conjunction with the Tribe(s), March ARB, MIPAA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities; MM-CUL-4 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. In addition, MM-TCR-1 (Tribal Monitoring) is included in the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities, and impacts related to the discovery of human remains would be less than significant with implementation of MM-CULTCR-3 (Inadvertent Discovery of Human Remains), which requires handling in accordance with California Health and Safety Code (H&SC) Section 7050.5 and California Public Resources Code Section 5097.98. These impacts would thus be less than significant with mitigation incorporated, and impacts related to historical resources would be less than significant.

Under Alternative 1, no development within the project site would occur; thus, no grading or excavation within the site would occur. Because no grading or construction would occur, Alternative 1 would not have the potential to impact archaeological resources or disturb human remains. Therefore, implementation of MM-CUL-1 through MM-CUL-35, MM-TCR-1, and MM-TCR-3 would not be required under this alternative. Thus, Alternative 1 would result in no potential impacts to cultural resources, as compared to the Proposed Project's less-than-significant impacts with mitigation incorporated.

Alternative 1, Subheading "Tribal Cultural Resources"

Pages 5-11-5-12

As discussed in Section 3.13, Tribal Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to tribal cultural resources (TCRs) with implementation of MM-CULTCR-1 (Archaeological and Tribal Monitoring), which requires the project applicant/developer to retain a qualified tribal monitor to monitor all initial ground-disturbing activities; MM-TCR-2 (Final Disposition), which provides protocols for treatment of inadvertent discoveries of TCRs and human remains; MM-TCR-3 (Discovery of Human Remains), which provides protocols for dealing with discovery of human remains; and MM-TCR-4 (Non-Disclosure), which restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. In addition, MM-CUL-1 (Archaeological Monitoring) requires archaeological monitoring of all mass grading and trenching activities, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical

sensitivity training for personnel on site. MM-CUL-1 also requires the Proposed Project's qualified archaeological Principal Investigator to develop a CRMTP prior to Proposed Project commencement. Impacts related to TCRs that are listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined in California Public Resources Code Section 5020.1(k) would be less than significant with mitigation incorporated.

Under Alternative 1, no development within the project site would occur; thus, no grading or excavation would occur. Because no grading or construction would occur, implementation of <u>MM-TCR-1</u> through <u>MM-TCR-4</u> and <u>MM-CUL-1</u> and <u>MM-CUL-3</u> would not be required under this alternative. Thus, Alternative 1 would result in **no potential impacts** to TCRs, as compared to the Proposed Project's less-than-significant impacts with mitigation incorporated.

Alternative 2, Subheading "Cultural Resources"

Page 5-16

As discussed in Section 3.4, Cultural Resources, buildout of the Proposed Project would result in less-thansignificant impacts to archaeological resources with implementation of MM-CUL-1 (Archaeological and Tribal Monitoring), which requires a tribal monitor archaeological monitoring during all initial ground-disturbing activities; and development of a Cultural Resource Monitoring and Treatment Plan (CRMTP), and MM CUL 2 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find. In addition, MM-CUL-2 (CRMTP), which requires the Principal Investigator, in conjunction with the Tribe(s), March ARB, MIPAA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities; MM-CUL-4 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. In addition, MM-TCR-1 (Tribal Monitoring) is included in the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities, and impacts related to the discovery of human remains would be less than significant with implementation of MM-CULTCR-3 (Inadvertent Discovery of Human Remains), which requires handling in accordance with California Health and Safety Code (H&SC) Section 7050.5 and California Public Resources Code Section 5097.98. These impacts would thus be less than significant with mitigation incorporated, and impacts related to historical resources would be less than significant.

Under Alternative 2, development within the project site would occur in the same manner as the Proposed Project, in that the Air Cargo Component and Off-Site Component under this alternative would be constructed within the same footprint as that planned for the Proposed Project. No grading or excavation activity would be proposed under Alternative 2 that would exceed the boundary of areas previously analyzed for potential cultural resource impacts. Because grading and excavation would occur under Alternative 2, implementation of MM-CUL-1 through MM-CUL-35, MM-TCR-1, and MM-TCR-3 would be required, which would ensure that impacts would be reduced to less than significant. Alternative 2 would not result in the potential to impact historical resources, as development would occur within the same footprint as that for the Proposed Project and would therefore not have the potential to disturb historical resources, the same as the Proposed Project. Impacts would be less than significant with

mitigation incorporated, the same as the Proposed Project. Thus, Alternative 2 would result in the **same level of cultural resources impacts** as the Proposed Project.

Alternative 2, Subheading "Tribal Cultural Resources"

Page 5-20

As discussed in Section 3.13, Tribal Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to TCRs with implementation of MM-CUL_TCR-1 (Archaeological and Tribal Monitoring), which requires the project applicant/developer to retain a qualified tribal monitor to monitor all initial ground-disturbing activities; MM-TCR-2 (Final Disposition), which provides protocols for treatment of inadvertent discoveries of TCRs and human remains; MM-TCR-3 (Discovery of Human Remains), which provides protocols for dealing with discovery of human remains; and MM-TCR-4 (Non-Disclosure), which restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. In addition, MM-CUL-1 (Archaeological Monitoring) requires archaeological monitoring of all mass grading and trenching activities, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training for personnel on site. MM CUL-1 also requires the Proposed Project's qualified archaeological Principal Investigator to develop a CRMTP prior to Proposed Project commencement. Impacts related to TCRs that are listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined in California Public Resources Code Section 5020.1(k) would be less than significant with mitigation incorporated.

Under Alternative 2, development within the site would occur in the same manner as that proposed by the Project; thus, grading and excavation activities within the site would occur, resulting in the potential to impact TCRs. Therefore, implementation of MM-CUL-1 would be required. With implementation of MM-TCR-1 through MM-TCR-4 and MM-CUL-3, Alternative 2 would result in a less-than-significant impact with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 2 would result in the same level of impacts to TCRs as the Proposed Project.

Alternative 3, Subheading "Cultural Resources"

Page 5-26

As discussed in Section 3.4, Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to archaeological resources with implementation of MM-CUL-1 (Archaeological and Tribal Monitoring), which requires a tribal monitor archaeological monitoring during all initial ground-disturbing activities; and development of a Cultural Resource Monitoring and Treatment Plan (CRMTP), and MM CUL 2 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find. In addition, MM-CUL-2 (CRMTP), which requires the Principal Investigator, in conjunction with the Tribe(s), March ARB, MIPAA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities; MM-CUL-4 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with

MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. In addition, MM-TCR-1 (Tribal Monitoring) is included in the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities, and impacts related to the discovery of human remains would be less than significant with implementation of MM-CULTCR-3 (Inadvertent Discovery of Human Remains), which requires handling in accordance with California Health and Safety Code (H&SC) Section 7050.5 and California Public Resources Code Section 5097.98. These impacts would thus be less than significant with mitigation incorporated, and impacts related to historical resources would be less than significant.

Under Alternative 3, development within the project site would occur in the same manner as the Proposed Project, in that the Air Cargo Component and Off-Site Component under this alternative would be constructed within the same footprint as that for the Proposed Project. No grading or excavation activity are proposed under Alternative 3 that would exceed the boundary of areas previously analyzed for potential cultural resource impacts. Because grading and excavation would occur under Alternative 3, implementation of MM-CUL-1 through MM-CUL-35, MM-TCR-1, and MM-TCR-3 would be required, which would ensure that impacts would be reduced to less than significant. Alternative 3 would not result in the potential to impact historical resources, because development would occur within the same footprint as that for the Proposed Project and would therefore not have the potential to disturb historical resources, the same as the Proposed Project. Impacts would be less than significant with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 3 would result in the same level of cultural resources impacts as the Proposed Project.

Alternative 3, Subheading "Energy"

Page 5-26-5-27

Under Alternative 3, the project site would be constructed in the same manner as the Proposed Project; therefore, energy demands associated with construction would be the same as the Proposed Project and construction-related energy impacts would be less than significant. Alternative 3 would also implement MM-AQ-2 through MM-AQ-5 and MM-GHG-1. Once operational, Alternative 3 would consume the same amount of electricity and natural gas as the Proposed Project. As shown in the technical study prepared for this alternative by Urban Crossroads, fuel sources and energy use would be reduced compared to the Proposed Project, because Alternative 3 would result in a reduction of total flight operations by 10% compared to the Proposed Project, resulting in total annual flight operations of 9,548 flights (Appendix S-1B-1). In addition, on-road mobile sources would similarly be reduced. This would yield an estimated annual fuel consumption of 538,441 gallons of fuel from on-road vehicles and 1,350,198 gallons of aircraft fuel, for a total of 1,888,639 gallons of petroleum fuel. This represents which is a reduction of 302,045457,105 gallons compared to the Proposed Project (Appendix S-1B-1). Thus, with the reduction in annual flight operations, total energy demand would be decreased compared to the Proposed Project. The reduction of flights would result in less fuel consumption during operation. Impacts would remain less than significant under Alternative 3, the same as the Proposed Project. However, because less fuel would be consumed during operations, Alternative 3 would result in a lower level of energy impacts compared to the Proposed Project.

Alternative 3, Subheading "Tribal Cultural Resources"

Page 5-31

As discussed in Section 3.13, Tribal Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to TCRs with implementation of **MM-CULTCR-1** (Archaeological and Tribal Monitoring), which

requires the project applicant/developer to retain a qualified tribal monitor to monitor all initial ground-disturbing activities; MM-TCR-2 (Final Disposition), which provides protocols for treatment of inadvertent discoveries of TCRs and human remains; MM-TCR-3 (Discovery of Human Remains), which provides protocols for dealing with discovery of human remains; and MM-TCR-4 (Non-Disclosure), which restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. In addition, MM-CUL-1 (Archaeological Monitoring) requires archaeological monitoring of all mass grading and trenching activities, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training for personnel on site. MM CUL 1 also requires the Proposed Project's qualified archaeological Principal Investigator to develop a CRMTP prior to Proposed Project commencement. Impacts related to TCRs that are listed or eligible for listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined in California Public Resources Code Section 5020.1(k) would be less than significant with mitigation incorporated.

Under Alternative 3, development within the project site would occur in the same manner as that planned for the Proposed Project; thus, grading and excavation activities within the project area would occur, resulting in the potential to impact TCRs. Therefore, implementation of MM-TCR-4 and MM-CUL-1 and <a

Alternative 4, Subheading "Cultural Resources"

Pages 5-36-5-37

As discussed in Section 3.4, Cultural Resources, buildout of the Proposed Project would result in less-thansignificant impacts to archaeological resources with implementation of MM-CUL-1 (Archaeological and Tribal Monitoring), which requires a tribal monitor archaeological monitoring during all initial ground-disturbing activities; and development of a Cultural Resource Monitoring and Treatment Plan (CRMTP), and MM CUL 2 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology can evaluate the significance of the find. In addition, MM-CUL-2 (CRMTP), which requires the Principal Investigator, in conjunction with the Tribe(s), March ARB, MIPAA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities; MM-CUL-4 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. In addition, MM-TCR-1 (Tribal Monitoring) is included in the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities, and impacts related to the discovery of human remains would be less than significant with implementation of MM-CULTCR-3 (Inadvertent Discovery of Human Remains), which requires handling in accordance with California Health and Safety Code (H&SC) Section 7050.5 and California Public Resources Code Section 5097.98. These impacts would thus be less than significant with mitigation incorporated, and impacts related to historical resources would be less than significant.

Under Alternative 4, development within the project site would occur in the same manner as the Proposed Project, in that the private aircraft terminal facility would be constructed within the same footprint as that planned for the Proposed Project. No grading or excavation activity would occur under this alternative that would exceed the boundary of areas previously analyzed for potential cultural resource impacts. Because grading and excavation would occur under Alternative 4, implementation of MM-CUL-1 through MM-CUL-35, MM-TCR-1, and MM-TCR-3 would be required, which would ensure that impacts would be reduced to less than significant. Alternative 4 would not result in the potential to impact historical resources, as development would occur within the same footprint as that planned under the Proposed Project and would therefore not have the potential to disturb historical resources, the same as the Proposed Project. Impacts would be less than significant with mitigation incorporated, the same as the Proposed Project. Therefore, Alternative 4 would result in the same level of cultural resources impacts as the Proposed Project.

Alternative 4, Subheading "Energy"

Page 5-37

Under Alternative 4, the project site would be constructed in the same manner as the Proposed Project; therefore, energy demands associated with construction would be the same as for the Proposed Project and construction-related energy impacts would be less than significant. Alternative 3½ would also implement MM-AQ-3, MM-AQ-5, and MM-GHG-1. Once operational, all energy-utilizing sources under Alternative 4 would consume the same amount of electricity and natural gas as the Proposed Project. As shown in the technical study prepared for this alternative by Urban Crossroads, fuel sources and energy use would be reduced compared to the Proposed Project, because Alternative 4 would include only smaller private aircraft and would eliminate the goods-distribution vehicles (trucks). This would yield an estimated annual motor vehicle fuel consumption of 201,550 gallons, which is a reduction of 420,918 gallons compared to the Proposed Project (Appendix S-2B-1). Annual aircraft fuel use associated with Alternative 4 would be 142,682 gallons, which is a reduction of 1,580,594509,561 gallons compared to the Proposed Project (Appendix S-2B-1). The total reduction in petroleum fuel compared to the Proposed Project would be 2,001,512 gallons. Thus, Alternative 4 would result in a reduction in total energy demand compared to the Proposed Project. However, because less energy would be consumed during operations, Alternative 4 would result in reduced energy impacts compared to the Proposed Project.

Alternative 4, Subheading "Tribal Cultural Resources"

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As discussed in Section 3.13, Tribal Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to TCRs with implementation of MM-GULTCR-1 (Archaeological and Tribal Monitoring), which requires the project applicant/developer to retain a qualified tribal monitor to monitor all initial ground-disturbing activities; MM-TCR-2 (Final Disposition), which provides protocols for treatment of inadvertent discoveries of TCRs and human remains; MM-TCR-3 (Discovery of Human Remains), which provides protocols for dealing with discovery of human remains; and MM-TCR-4 (Non-Disclosure), which restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. In addition, MM-CUL-1 (Archaeological Monitoring) requires archaeological monitoring of all mass grading and trenching activities, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training for personnel on site. MM CUL 1 also requires the Proposed Project's qualified archaeological Principal Investigator to develop a CRMTP prior to Proposed Project commencement. Impacts related to TCRs that are listed or eligible for

listing in the California Register of Historical Resources (CRHR) or in a local register of historical resources as defined in California Public Resources Code Section 5020.1(k) would be less than significant with mitigation incorporated.

Under Alternative 4, development within the project site would occur in a similar manner to that planned for the Proposed Project; thus, grading and excavation activities within the project area would occur. Therefore, Alternative 4 would result in the potential to disturb TCRs, requiring implementation of MM-TCR-1 through MM-TCR-4 and MM-CUL-1. With implementation of these mitigation measures MM-CUL-1, Alternative 4 would result in a less-than-significant impact with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 4 would result in the same level of impacts to TCRs as the Proposed Project.

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5.4.6 Alternative 5: Reduced Operation/No Nighttime Flights Alternative

Under Alternative 5, the Reduced Operation/No Nighttime Flights Alternative, buildout of the project site would occur in an identical manner to the Proposed Project. Thus, Alternative 5 would result in the development of the Air Cargo Center Component and the Off-Site Component, as discussed in Chapter 2, Project Description. The cargo building and all proposed taxiway and aircraft parking apron improvements, utility improvements, landscaping, and internal driveways/parking lots, as well as the work within the right-of-way along Heacock Street, would be constructed in the exact same manner as the Proposed Project. In addition, all off-site work planned under the Proposed Project, including the work to be completed in Work Areas 1–5, would occur under this alternative.

The operational aspects of the cargo building would remain the same as those identified for the Proposed Project. However, under Alternative 5, annual flight operations would be reduced by 10%, resulting in total annual operations of 9,548 flight operations. Additionally, under Alternative 5, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Thus, flight operations under Alternative 5 would occur only from 7:00 a.m. to 10:00 p.m. Operation of the air cargo center would similarly be reduced by 10%.

5.4.6.1 Environmental Analysis

Aesthetics

As discussed in Section 3.1, Aesthetics, implementation of the Proposed Project would not result in the creation of a new source of substantial light or glare that would adversely affect day or nighttime views of the area. The project site is not an existing source of substantial light or glare due to the lack of development within the site, and the Proposed Project would introduce development and construction activity that would generate a source of light and glare. However, lighting associated with the Proposed Project would be of a similar nature and distribution as the lighting sources currently installed on warehouse and distribution facility properties in the surrounding area. Further, the proposed use of hoods or shields on all lighting fixtures, and the downward direction of all lighting sources, would also minimize the potential for outdoor lighting sources to produce glare that would be experienced by off-site viewers. In addition, the development plans would require installation of lighting fixtures with full cutoff fixtures and restriction of individual fixtures to not exceed 2,700 kelvin and 750 watts. With regard to glare, the proposed cargo building would feature non-reflective stucco-clad exterior walls and limited windows that would be

located at the main building entrance and along the building's east elevation (near the main entrance), which would not be directed toward sensitive off-site ground-based receptors. As such, lighting and glare impacts would be less than significant.

Under Alternative 5, the project site would be developed in the same manner as the Proposed Project. Thus, Alternative 5 would contribute additional lighting to the area through the construction and operation of an air cargo center within the site, as well as through aircraft flight operations after sundown. Similar to the Proposed Project, development under this alternative would generate construction light and glare, and the applicant would be required to submit Form 7460-1, Notice of Proposed Construction or Alteration, to FAA. With submittal of this form and completion of a review of the proposed construction and alteration by FAA (and identification of needed temporary lighting measures), in conjunction with the short duration and assumed infrequency of necessary nighttime construction. Construction of this alternative would not create a new source of substantial light or glare that would adversely affect day- or nighttime views in the area, resulting in a less-than-significant impact, the same as the Proposed Project. Regarding operational light and glare impacts, Alternative 5 would implement development plans to ensure that operational light and glare impacts would be less than significant, the same as the Proposed Project. Lastly, regarding March ARB taxiway lighting impacts, because Alternative 5 would result in the same alterations to existing Taxiways A and G within March ARB, the project applicant would be required to submit FAA Form 7460-1, and because any new lighting constructed within Taxiways A, C, and G would be similar to and consistent with the existing March ARB lighting surrounding the project site, Alternative 5 would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. However, because no flight operations would occur between 10:00 p.m. and 11:00 p.m. and annual flight operations would be reduced by 10%, Alternative 5 would result in less overall lighting and potential glare associated with aircraft operations. Additionally, the reduced annual aircraft operations would achieve a related reduction in distribution truck traffic; therefore, Alternative 5 would result in overall reduced nighttime lighting and glare impacts. Impacts would be less than significant, the same as the Proposed Project. Thus, Alternative 5 would result in reduced aesthetic impacts compared to the Proposed Project.

Air Quality

As discussed in Section 3.2, Air Quality, implementation of the Proposed Project would result in construction emissions that do not exceed the SCAQMD regional construction thresholds. Implementation of MM-AQ-1 (Construction Management Plan), which requires the Proposed Project to use Tier 4 off-road-construction equipment, and MM-AQ-2 (Construction Requirements) would further reduce construction emissions and impacts would remain less than significant. Regional operational air quality impacts would be potentially significant, as the Proposed Project's daily regional emissions from ongoing non-peak and peak operations would exceed the thresholds of significance for emissions of VOCs, NO_x, and CO. The exceedance of the regional operational thresholds for VOCs, NO_x, and CO would be primarily due to the Proposed Project's flight operations. The project applicant would implement MM-AQ-1 through MM-AQ-6 to reduce the Proposed Project's operational VOC, NO_x, and CO emissions; however, there is no meaningful way to quantify these reductions in CalEEMod; therefore, no numeric emissions credit was taken in the analysis. Therefore, the Proposed Project's regional operational VOC, NO_x, and CO emissions would be significant and unavoidable. The Proposed Project would not result in an exceedance of SCAQMD's localized significance thresholds, would not cause a CO hotspot, and would not cause a toxic air contaminant health risk impact. Accordingly, impacts to sensitive receptors and those related to odors would be less than significant.

Construction of Alternative 5 would result in the same less-than-significant construction air quality emissions generated as those identified for the Proposed Project. Alternative 5 would incorporate MM-AQ-1 and MM-AQ-2, which would further reduce construction emissions, the same as the Proposed Project.

Regarding operational emissions, Alternative 5 would have equivalent impacts to Alternative 3, which would reduce operational activities compared to the Proposed Project by 10%. Under Alternative 5, the total annual flight operations generated by the Proposed Project (10,608 annual operations) would be reduced by 10%, resulting in a total of 9,548 annual operations. Thus, it can be estimated that total maximum daily emissions from aircraft sources for Alternative 5 would be reduced by 10%, when assuming the same type of aircraft would be used under this alternative. Operation of the air cargo center would similarly be reduced by 10%. In addition, under Alternative 5, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Thus, flight operations under Alternative 5 would occur only from 7:00 a.m. to 10:00 p.m.

CalEEMod utilizes summer and winter EMFAC2021 emission factors to derive vehicle emissions associated with Alternative 5 operational activities, which vary by season. Tables 5-11 and 5-12 provide the daily operational emission estimates assuming a 10% reduction in annual operations. As shown in these tables, with a 10% reduction in annual operations, the total maximum daily emissions of VOC, NO_x, and CO would be reduced but would still exceed the applicable thresholds. Alternative 5 would also implement MM-AQ-3 through MM-AQ-6 to reduce the operational VOC, NO_x, and CO emissions, but impacts would remain significant and unavoidable. Alternative 5 would result in **reduced air quality impacts** compared to the Proposed Project but impacts would still be significant and unavoidable.

Table 5-11. Alternative 5 Operational Emissions - Non-Peak Season, 48 Weeks

	Emissions (Pounds per Day)					
Source	voc	NO _x	СО	SO _x	PM ₁₀	PM _{2.5}
Mobile source	10.58	53.90	145.10	0.71	17.64	4.06
Area source	12.22	0.14	15.72	0.00	0.02	0.02
Energy source	0.10	1.86	1.56	0.02	0.14	0.14
On-site equipment source	0.23	0.75	32.89	0.00	0.06	0.05
Aircraft source ^a	157.46	500.08	657.16	37.26	5.22	5.18
Total Maximum Daily Emissions	180.59	556.73	852.43	37.99	23.08	9.45
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No

Source: Appendix S-1.

Notes: VOC = volatile organic compound; 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; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District. The emissions in this table are based on a CalEEMod summer emissions estimate.

a Assumes a 10% reduction in total annual flight operations compared to the Proposed Project. Aircraft characteristics utilized for estimating aircraft emissions under the Proposed Project assumed 10,608 annual operations occurring from the March ARB Air Cargo facilities (5,304 arrivals and 5,304 departures; refer to Appendix B-1).

Table 5-12. Alternative 5 Operational Emissions - Peak Season, 4 Weeks

	Emissions (Pounds per Day)					
Source	voc	NO _x	СО	SO _x	PM ₁₀	PM _{2.5}
Summer						
Mobile source	10.11	56.70	119.70	0.69	17.64	4.06
Area source	9.64	0.00	0.00	0.00	0.00	0.00
Energy source	0.10	1.86	1.56	0.02	0.14	0.14
On-site equipment source	0.23	0.75	32.89	0.00	0.06	0.05
Aircraft sourcea	174.94	555.64	730.04	41.40	5.82	5.78
Total Maximum Daily Emissions	195.02	614.95	884.19	42.11	23.66	10.03
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No

Source: Appendix S-1.

Notes: VOC = volatile organic compound; 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; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District. Emissions in this table are based on a CalEEMod winter emissions estimate.

Biological Resources

As discussed in Section 3.3, Biological Resources, implementation of the Proposed Project would result in less-than-significant biological resources impacts with implementation of MM-BIO-1A through MM-BIO-5. In regard to impacts to burrowing owls, MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures) requires pre-construction survey buffers for occupied burrows, and monitoring during construction to ensure complete avoidance of the occupied burrows; MM-BIO-1B (Burrowing Owl Relocation and Mitigation Plan) requires the preparation of a Burrowing Owl Relocation and Mitigation Plan and habitat compensation for the loss of occupied habitat; and MM-BIO-2 (Best Management Practices) establishes measures that require clearly marking work limits; restricting vehicle speed limits to 15 mph or less to minimize the generation of fugitive dust; providing pet restrictions; providing measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and the incorporation of native, non-invasive landscaping to minimize the spread of non-native invasive plant and animal species. In regard to impacts to San Diego black-tailed jackrabbit, MM-BIO-2 would be implemented, as would MM-BIO-3 (San Diego Black-Tailed Jackrabbit Avoidance and Minimization Measures), which requires a pre-construction survey to be conducted 30 days prior to ground-disturbing activities and the demarcation and avoidance of active maternity dens during the pup-rearing season (February 15 through July 1). Impacts to the California glossy snake would be mitigated through implementation of MM-BIO-2. Impacts to protected nesting birds would be mitigated through implementation of MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures), which requires nesting bird surveys of impact areas; if active nests are found, the biologist must establish buffers and/or implement monitoring to avoid impacting avian nesting success. Regarding impacts to jurisdictional waters, MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting) would be implemented. This mitigation measure requires that compensatory mitigation be provided, that applicable resource agency permits be received prior to Proposed Project implementation, that equipment and spoil sites not be placed within or adjacent to aquatic resources, and that

a Assumes a 10% reduction in total annual flight operations compared to the Proposed Project. Aircraft characteristics utilized for estimating aircraft emissions under the Proposed Project assumed 10,608 annual operations occurring from the March ARB Air Cargo facilities (5,304 arrivals and 5,304 departures; refer to Appendix B-1).

pollutants be contained to prevent contamination of soils and/or waterways. Impacts to all other biological resources would be less than significant without the need for mitigation.

Under Alternative 5, development within the project site would occur in the same manner as the Proposed Project. Grading and construction activity would occur within the exact same footprint as the Proposed Project, and all operational aspects that would impact biological resources would be the same as the Proposed Project. Therefore, implementation of MM-BIO-1A through MM-BIO-5 would be required, which would result in biological resources impacts that would be less than significant with mitigation incorporated, the same as the Proposed Project. Thus, implementation of Alternative 5 would result in the same level of biological resource impacts as the Proposed Project.

Cultural Resources

As discussed in Section 3.4, Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to archaeological resources with implementation of MM-CUL-1 (Archaeological Monitoring), which requires archaeological monitoring during all initial ground-disturbing activities; MM-CUL-2 (CRMTP), which requires the Principal Investigator, in conjunction with the Tribe(s), March ARB, MIPAAMarch JPA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities; MM-CUL-4 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's March JPA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. In addition, MM-TCR-1 (Tribal Monitoring) is included in the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities, and impacts related to the discovery of human remains would be less than significant with implementation of MM-TCR-3 (Discovery of Human Remains), which requires handling in accordance with H&SC Section 7050.5 and California Public Resources Code Section 5097.98. Impacts related to historical resources would be less than significant.

Under Alternative 5, development within the project site would occur in the same manner as the Proposed Project, in that the Air Cargo Component and Off-Site Component under this alternative would be constructed within the same footprint as that planned for the Proposed Project. No grading or excavation activity would be proposed under Alternative 5 that would exceed the boundary of areas previously analyzed for potential cultural resource impacts. Because grading and excavation would occur under Alternative 5, implementation of MM-CUL-1 through MM-CUL-5, MM-TCR-1, and MM-TCR-3 would be required, which would ensure that impacts would be reduced to less than significant. Alternative 5 would not result in the potential to impact historical resources, as development would occur within the same footprint as that for the Proposed Project and would therefore not have the potential to disturb historical resources, the same as the Proposed Project. Impacts would be less than significant with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 5 would result in the same level of cultural resources impacts as the Proposed Project.

Energy

As discussed in Section 3.5, Energy, construction and operation of the Proposed Project would result in less-than-significant impacts relating to wasteful, inefficient, or unnecessary consumption of energy resources. Mitigation for air quality (MM-AQ-2 through MM-AQ-5) and GHG emissions (MM-GHG-1), although its beneficial

effects are not quantifiable with regard to energy and therefore are not included in the analysis, would provide co-benefits that would further reduce the demand for energy and minimize any potential energy impacts relating to conflict with or obstruction of state or local plans for renewable energy or energy efficiency. Impacts would remain less than significant.

Under Alternative 5, the project site would be constructed in the same manner as the Proposed Project; therefore, energy demands associated with construction would be the same as the Proposed Project and construction-related energy impacts would be less than significant. Alternative 5 would also implement MM-AQ-2 through MM-AQ-5 and MM-GHG-1. Once operational, Alternative 5 would consume the same amount of electricity and natural gas as the Proposed Project. As shown in the technical study prepared for this alternative by Urban Crossroads, fuel sources and energy use would be reduced compared to the Proposed Project, because Alternative 5 would result in a reduction of total flight operations by 10% compared to the Proposed Project, resulting in total annual flight operations of 9,548 flights (Appendix S-1). In addition, on-road mobile sources would similarly be reduced. This would yield an estimated annual fuel consumption of 538,441 gallons of fuel from on-road vehicles and 1,350,198 gallons of aircraft fuel, for a total of 1,888,639 gallons of petroleum fuel. This represents a reduction of 457,105 gallons compared to the Proposed Project (Appendix S-1). Thus, with the reduction in annual flight operations, total energy demand would be decreased compared to the Proposed Project. The reduction of flights would result in less fuel consumption during operation. Impacts would remain less than significant under Alternative 5, the same as the Proposed Project. However, because less fuel would be consumed during operations, Alternative 5 would result in reduced energy impacts compared to the Proposed Project.

Geology and Soils

As discussed in Section 3.6, Geology and Soils, buildout of the Proposed Project would result in less-than-significant impacts through compliance with and implementation of the recommendations included in the project-specific Geotechnical Exploration Report (Appendix H). In addition, impacts related to paleontological resources would be less than significant with implementation of **MM-GEO-1** (Paleontological Monitoring Program), which requires monitoring for and recovery of any found paleontological resources. All other geology and soils impacts would be less than significant.

Under Alternative 5, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned for the Proposed Project. No grading or construction activity would be proposed under Alternative 5 that would exceed the boundary of areas previously analyzed, and all structures constructed within the project site and off-site work areas would be subject to compliance with the geotechnical recommendations contained in the Geotechnical Exploration Report for the Proposed Project (Appendix H). Through implementation of the geotechnical recommendations contained in the Geotechnical Exploration Report, impacts related to seismic ground shaking/seismic-related ground failure, liquefaction, liquefaction-induced lateral spreading, dry dynamic settlement, soil collapse/settlement, and expansive soils would be less than significant, the same as the Proposed Project. Regarding paleontological resources, because grading and excavation would occur under Alternative 5 in the same manner as that planned by the Proposed Project and would occur within the same footprint as that for the Proposed Project, implementation of MM-GEO-1 would be required, which would ensure that impacts to paleontological resources would be reduced to less than significant. Alternative 5 would not have the potential to disturb paleontological resources beyond what was analyzed for the Proposed Project. Impacts to geology and soils would be less than significant with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 5 would result in the same level of geology and soils impacts as the Proposed Project.

Greenhouse Gas Emissions

As discussed in Section 3.7, Greenhouse Gas Emissions, the Proposed Project would be consistent with SB 32, SB 375, and the County of Riverside's CAP with implementation of MM-AQ-2 through MM-AQ-6 and MM-GHG-1 (Installation of EV Charging Stations). Therefore, the Proposed Project's GHG impacts would be less than significant with mitigation incorporated. For informational purposes, the annual GHG emissions associated with operation of the Proposed Project are estimated to be 23,054.04 MT CO₂e per year. Emission reductions from implementation of MM-AQ-2 through MM-AQ-6 are not readily quantifiable; therefore, no reduction in emissions was taken for those measures.

Under Alternative 5, the project site would be built out in the same manner as the Proposed Project; thus, construction GHG emissions would be the same. Alternative 5 would have equivalent impacts to Alternative 3, which reduced operational activities compared to the Proposed Project by 10%. Under Alternative 5, the total annual flight operations generated by the Proposed Project (10,608 annual operations) would be reduced by 10%, resulting in a total of 9,548 annual operations. Thus, it can be estimated that total maximum GHG emissions from aircraft sources for Alternative 5 would be reduced by 10%, when assuming the same type of aircraft would be used under this alternative. Operation of the air cargo center would similarly be reduced by 10%. Operation of the air cargo center would similarly be reduced by 10%. Implementation of MM-AQ-2 through MM-AQ-6 and MM-GHG-1 would be required under Alternative 5. Alternative 5 would be consistent with SB 32, SB 375, and the County of Riverside's CAP, similar to the Proposed Project. Therefore, Alternative 5's GHG impacts would be less than significant with mitigation incorporated. For informational purposes, the estimated total MT CO₂e emissions with mitigation and with a 10% reduction in operations are provided in Table 5-13.

Table 5-13. Alternative 5 Greenhouse Gas Emissions (with Mitigation)

Emission Source	CO ₂ e Emissions (MT/yr) – Mitigated
Annual construction-related emissions amortized over 30 years	24.83
Mobile source	5,185.37
Area source	3.67
Energy source	332.09
Water	103.72
Waste	52.95
Refrigerant leakage	30.42
Cargo handling equipment	285.36
Aircrafta	16,114.93
Reductions from Electric Vehicle Charging Stations	-170
Alternative Total CO ₂ e Emissions (All Sources)	21,963.34

Source: Appendix S-1.

Notes: CO_2e = carbon dioxide equivalent; MT/yr = metric tons per year.

Because total GHG emissions would be reduced, Alternative 5 would result in **reduced GHG emissions impacts** compared to the Proposed Project.

a Assumes a 10% reduction in total annual flight operations compared to the Proposed Project. Aircraft characteristics utilized for estimating aircraft emissions under the Proposed Project assumed 10,608 annual operations occurring from the March ARB Air Cargo facilities (5,304 arrivals and 5,304 departures; refer to Appendix B-1).

Hazards and Hazardous Materials

As discussed in Section 3.8, Hazards and Hazardous Materials, implementation of the Proposed Project would result in less-than-significant impacts associated with Proposed Project construction with implementation of MM-HAZ-1 (Hazardous Materials Contingency Plan) and MM-HAZ-2 (Stop Work, Groundwater Management). MM-HAZ-1 requires the project applicant to develop an HMCP that addresses the potential impacts to soil, soil vapor, and groundwater beneath the project site. Additionally, MM-HAZ-1 requires the project applicant to submit the HMCP to EPA Region IX and the state for review prior to commencement of construction and/or soil disturbance activities on Site 7. MM-HAZ-2 requires work activities to cease should groundwater be encountered during excavation and/or construction activities. In addition, implementation of MM-HAZ-3 (Wildlife Protective Measures) would require that protective measures (e.g., security fencing) be placed to secure contaminated areas and prevent a hazard to human health or the environment (including wildlife). Impacts relating to safety hazards or excessive noise for nearby residents or workers within an airport land use compatibility plan area would be less than significant; all other hazards-related impacts from the Proposed Project would be less than significant with mitigation incorporated.

Under Alternative 5, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned for the Proposed Project. Demolition of existing structures, such as the tarmac, would occur in the same manner as the Proposed Project. No grading or excavation would be proposed under this alternative that would exceed the boundary of areas previously analyzed for potential hazards and hazardous material impacts. During construction of Alternative 5, a variety of hazardous materials, which would be the same as those used during construction of the Proposed Project, would be transported, stored, and used during construction activities. Any handling, transport, use, or disposal would comply with all applicable federal, state, and local regulations (as listed in Section 3.8.2 of the EIR), the same as the Proposed Project. Moreover, implementation of MM-HAZ-1 and MM-HAZ-2 would be required during construction of Alternative 5, which would ensure that potential impacts associated with exposure to soil, soil vapor, and groundwater beneath the project site would be less than significant with mitigation incorporated. In addition, Alternative 5 would incorporate MM-HAZ-3, which requires protective measures (i.e., security fencing) to secure contaminated areas and prevent a hazard to human health or the environment (including wildlife). However, with the 10% reduction in operations. Alternative 5 would use a reduced amount of hazardous materials, such as fuel. Thus, Alternative 5 would result in reduced hazards and hazardous materials impacts compared to the Proposed Project.

Hydrology and Water Quality

As discussed in Section 3.9, Hydrology and Water Quality, implementation of the Proposed Project would result in less-than-significant impacts associated with water quality standards and groundwater with implementation of MM-HYD-1, MM-HAZ-1, MM-HAZ-2, and MM-AQ-6, which require the following: incorporation of water quality BMPs into the Project design (MM-HYD-1); development of an HMCP and submitting it to EPA Region IX and to the state for approval prior to commencement of construction and/or soil disturbance activities on Site 7 (MM-HAZ-1); ceasing of work activities should groundwater be encountered during the course of Proposed Project construction and either management of contaminated groundwater or alteration of construction plans to avoid further contact with contaminated groundwater (MM-HAZ-2); and sweeping of the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants (MM-AQ-6). All other hydrology and water quality impacts would be less than significant, and overall hydrology and water quality impacts would be less than significant with mitigation incorporated.

Under Alternative 5, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned for the Proposed Project. No grading or excavation activity are proposed under Alternative 5 that would exceed the boundary of areas previously analyzed for potential hydrology and water quality impacts. Therefore, any grading and change to the existing hydrological setting would occur in the same manner as the Proposed Project. Thus, implementation of MM-HYD-1, MM-HAZ-1, MM-HAZ-2, and MM-AQ-6 would be required. With implementation of these measures, impacts would be reduced to less than significant with mitigation incorporated, the same as the Proposed Project. Therefore, Alternative 5 would result in the same level of hydrology and water quality impacts as the Proposed Project.

Land Use and Planning

As discussed in Section 3.10, Land Use and Planning, construction and operation of the Proposed Project would result in less-than-significant land use and planning impacts with implementation of mitigation measures related to air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, noise, and transportation. Incorporation of MM-LU-1 (Occupancy Limits) would also avoid or minimize land use and planning impacts.

Under Alternative 5, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned under the Proposed Project. All structures would be constructed to the identical specifications called for in the site plans. Under Alternative 5, annual flight operations would be reduced by 10% compared to the Proposed Project. Operation of the air cargo center would similarly be reduced by 10%. Incorporation of MM-LU-1, as well as implementation of mitigation measures related to air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, noise, and transportation would be required under this alternative. Impacts would be less than significant with mitigation incorporated. As such, Alternative 5 would result in the same level of land use and planning impacts as the Proposed Project.

Noise

As discussed in Section 3.11, Noise, once operational, the Proposed Project would result in less-than-significant impacts associated with exposure of workers to excessive noise relating to potential aircraft noise levels within the cargo building, with implementation of MM-NOI-1 (Construction Worker Hearing Protection). MM-NOI-1 requires the project applicant to provide evidence that the subject plans contain requirements with respect to contractor(s) providing employees with personal protective equipment per 8 CCR, Section 5096, and OSHA information (e.g., Publication 3498). The cargo aircraft flight operations of the Proposed Project would result in an increase in the ambient noise environment. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation, MM-NOI-2 (Future Tenant Aircraft Fleet), which requires that prior to issuance of a certificate of occupancy a noise analysis be provided confirming the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required. Therefore, noise impacts due to Proposed Project's aircraft operations would be significant and unavoidable even with the application of feasible mitigation. The Proposed Project would have less-than-significant impacts related to potential sleep disturbance from nighttime aircraft operations.

Under Alternative 5, buildout of the project site would occur in an identical manner to the Proposed Project, in that the Air Cargo Center Component and all proposed taxiway, taxilane, and aircraft parking apron improvements; utility improvements; landscaping; and internal roadways/parking lots would be constructed in the exact same manner

as the Proposed Project and would require implementation of MM-NOI-1. The operational aspects would be reduced 10% compared to the Proposed Project and no flight operations would occur during nighttime hours (10:00 p.m. to 7:00 a.m., with no flight operations occurring between 10:00 p.m. and 11:00 p.m.). The number of trips would be reduced by 10%, as would annual flight operations, resulting in the total annual cargo aircraft operations of 9,548 flights. Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 5 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. The noise level reduction obtained by eliminating the 5% of the operations that would occur between 10:00 p.m. and 11:00 p.m. and the overall 10% reduction in flight operations compared with the Proposed Project would result in a reduction of approximately 1 dB at noise-sensitive receptors with the greatest exposure to air cargo flight operations. By way of example, modeled off-site receiver position R5 would be predicted to experience an increase to the outdoor ambient sound level due to Alternative 5, but the increase would not be sufficient to exceed FICON-based criteria as presented in Section 3.11, Noise, and thus would be considered a less-than-significant impact. However, the noise level increase that would occur under Alternative 5 as studied at other off-site receptor positions (e.g., at R8, R9, and R10) would still cause the resulting CNEL to grow from a baseline of less than 65 dBA CNEL to a level that exceeds 65 dBA CNEL and would thus remain a significant and unavoidable noise impact (Appendix P). Therefore, MM-NOI-2 would also be implemented under Alternative 5, but impacts would remain significant and unavoidable, similar to the Proposed Project. As previously stated, MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Because Alternative 5 would have no potential sleep disturbance impact and a reduced noise level increase due to aircraft operations, Alternative 5 would result in reduced noise impacts compared to the Proposed Project.

Transportation

As discussed in Section 3.12, Transportation, construction of the Proposed Project would result in a VMT per employee of 23.12, which is below the WRCOG significance threshold of 25.47 VMT per employee (approximately 9.23% below the threshold). Therefore, the Proposed Project's VMT impact would be less than significant. All other transportation-related impacts would be less than significant or less than significant with mitigation incorporated. In addition, the Proposed Project would incorporate PDF-TRA-1 (Payment of Fair-Share Cost) and would require implementation of MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street). PDF-TRA-1 requires the Proposed Project to contribute its fair share toward intersection improvement measures. MM-TRA-1 requires the applicant to develop and implement a project-specific Construction Traffic Management Plan (CTMP) approved by MIPAAMarch JPA, and MM-TRA-2 requires all Proposed Project truck traffic to utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. Overall transportation impacts under the Proposed Project would be less than significant with mitigation incorporated.

Under Alternative 5, the project site would be built out in the same manner as the Proposed Project. Under Alternative 5, annual flight operations would be reduced by 10% compared to the Proposed Project. Operation of the air cargo center would similarly be reduced by 10%. Alternative 5 would incorporate PDF-TRA-1, MM-TRA-1, and MM-TRA-2. Operations would be reduced by 10%, and the employee count under this alternative would also be reduced by 10% compared to the Proposed Project. Thus, the employee trip generation rate would be less than the Proposed Project, and this alternative's impact based on VMT would be less than significant, the same as the Proposed Project. Therefore, Alternative 5 would result in **reduced transportation impacts** compared to the Proposed Project.

Tribal Cultural Resources

As discussed in Section 3.13, Tribal Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to TCRs with implementation of MM-TCR-1 (Tribal Monitoring), which requires the project applicant/developer to retain a qualified tribal monitor to monitor all initial ground-disturbing activities; MM-TCR-2 (Final Disposition), which provides protocols for treatment of inadvertent discoveries of TCRs and human remains; MM-TCR-3 (Discovery of Human Remains), which provides protocols for dealing with discovery of human remains; and MM-TCR-4 (Non-Disclosure), which restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. In addition, MM-CUL-1 (Archaeological Monitoring) requires archaeological monitoring of all mass grading and trenching activities, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training for personnel on site. Impacts related to TCRs that are listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k) would be less than significant with mitigation incorporated.

Under Alternative 5, development within the site would occur in the same manner as that proposed by the Project; thus, grading and excavation activities within the site would occur, resulting in the potential to impact TCRs. Therefore, implementation of MM-TCR-1 through MM-TCR-4 and MM-CUL-1 and MM-CUL-3 would be required. With implementation of these mitigation measures, Alternative 5 would result in a less-than-significant impact with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 5 would result in the same level of impacts to TCRs as the Proposed Project.

Utilities and Service Systems

As discussed in Section 3.14, Utilities and Service Systems, the Proposed Project would have less-than-significant impacts to facilities providing water, wastewater, stormwater, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Proposed Project, resulting in less-than-significant impacts. The Proposed Project would have no impact on solid waste infrastructure and capacity and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, resulting in less-than-significant impacts. Therefore, the Proposed Project's impacts to utilities and service systems would be less than significant and no mitigation is required.

Under Alternative 5, development within the project site would occur in the same manner as that planned for the Proposed Project. Under Alternative 5, annual flight operations would be reduced by 10% compared to the Proposed Project. Operation of the air cargo center would similarly be reduced by 10%. Thus, Alternative 5 would result in less-than-significant impacts related to facilities providing water, wastewater, stormwater, electric power, natural gas, and telecommunications. Alternative 5 would require a reduced level of water and wastewater treatment capacity compared to the Proposed Project. In addition, Alternative 5 would result in a reduced amount of solid waste generated during the construction and grading process and the operation of the Proposed Project, because the development of the site and the number of employees would be the same as the Proposed Project but annual flight operations and air cargo operations would be reduced by 10%, thereby resulting in less-than-significant impacts relating to solid waste. Thus, Alternative 5 would result in a **reduced level of impacts to utilities and service systems** compared to the Proposed Project.

5.4.6.2 Project Objectives

Under Alternative 5, the project site would be built out in the same manner as the Proposed Project. Under this alternative, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Annual flight operations would be reduced by 10% compared to the Proposed

Project. Operation of the air cargo center would similarly be reduced by 10%. Table 5-14 provides a list of the project objectives and whether Alternative 5 meets each objective. As discussed in this table, Alternative 5 would meet all project objectives, but to a lesser extent than the Proposed Project.

Table 5-14. Alternative 5 Success at Meeting Project Objectives

Project Objective	Alternative Meets Objective?
More fully utilize the operations capacity of the March Inland Port Airport to meet regional demands for air cargo services within Southern California and the greater region, thereby alleviating congestion and overtaxed air and roadway facilities within the greater region.	Yes. Development of this alternative would result in the provision of additional air cargo operations that would more fully utilize the operations capacity of MIP Airport to meet regional demands for air cargo services within Southern California and the greater region. However, this alternative would result in a reduction of annual flight operations compared to the Proposed Project, which would not help to alleviate congestion or overtaxed air and roadway facilities within the greater region to the same extent as the Proposed Project. Therefore, this alternative would meet this project objective, albeit to a lesser extent than the Proposed Project.
Provide appropriate land use intensities to comply with the parameters of the March Air Reserve Base/Inland Port Airport Compatibility Plan.	Yes. As discussed in the environmental analysis above, the project site would be constructed in the same manner to that proposed by the Proposed Project and would provide a land use (aviation) that is consistent with the allowed uses of the March ARB/Inland Port ALUCP. Alternative 5 would implement the same Plot Plan associated with the Proposed Project, resulting in the construction of the cargo building and tarmac extensions and improvements. Thus, Alternative 5 would result in the provision of a land use intensity (aviation facility) that would comply with the parameters of the March ARB/Inland Port ALUCP. As such, Alternative 5 would achieve this project objective.
Avoid impacts to, or impediment of, the remediation of the burn areas within Site 7.	Yes. Development of this alternative would have the same footprint as the Proposed Project and would avoid impacts to the burn areas of Site 7.
Provide increased job opportunities for local residents through the provision of employment-generating businesses.	Yes. Implementation of Alternative 5 would result in the generation of jobs. Therefore, Alternative 5 would meet this project objective.
Improve access for airport users to the existing taxiways.	Yes. Development of Alternative 5 would result in the same taxiway extensions and realignments planned under the Proposed Project to provide aircraft access from the project site to the existing taxiways within March ARB. Therefore, Alternative 5 would meet this project objective.
Facilitate development of aviation uses other than federal military aviation.	Yes. Implementation of Alternative 5 would result in the development of civil aircraft aviation uses, as allowed by the joint use agreement between MIPAA and DAF. The total annual flights under this alternative would be consistent with the joint use agreement and Air Installations Compatible Use Zone terms. Therefore, Alternative 5 would meet this project objective.

Notes: MIP = March Inland Port; ARB = Air Reserve Base; ALUCP = Airport Land Use Compatibility Plan; DAF = U.S. Department of the Air Force.

5.4.7 Alternative 6: Reduced Aviation Noise Alternative

Under Alternative 6, the Reduced Aviation Noise Alternative, buildout of the project site would occur in an identical manner to the Proposed Project. Thus, Alternative 6 would result in the development of the Air Cargo Center Component and the Off-Site Component, as discussed in Chapter 2, Project Description. The cargo building and all proposed taxiway and aircraft parking apron improvements, utility improvements, landscaping, and internal driveways/parking lots, as well as the work within the right-of-way along Heacock Street, would be constructed in the exact same manner as the Proposed Project. In addition, all off-site work planned under the Proposed Project, including the work to be completed in Work Areas 1–5, would occur under this alternative.

The operational aspects of the cargo building would remain the same as those identified for the Proposed Project. However, under Alternative 6, annual flight operations would be reduced by approximately 30%, resulting in total annual operations of 7,488 flight operations. Flight operations would occur between 7:00 a.m. and 10:00 p.m. Alternative 6 restricts a higher percentage of flight operations to daytime hours (7:00 a.m. to 7:00 p.m.) than the Project. Additionally, under Alternative 6, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Alternative 6 forgoes the Proposed Project's non-peak/peak flight distribution. Alternative 6 is anticipated to have a maximum of 12 flights per day, 6 days a week. Operation of the air cargo center would similarly be reduced by approximately 30%.

5.4.7.1 Environmental Analysis

Aesthetics

As discussed in Section 3.1, Aesthetics, implementation of the Proposed Project would not result in the creation of a new source of substantial light or glare that would adversely affect day or nighttime views of the area. The project site is not an existing source of substantial light or glare due to the lack of development within the site, and the Proposed Project would introduce development and construction activity that would generate a source of light and glare. However, lighting associated with the Proposed Project would be of a similar nature and distribution as the lighting sources currently installed on warehouse and distribution facility properties in the surrounding area. Further, the proposed use of hoods or shields on all lighting fixtures, and the downward direction of all lighting sources, would also minimize the potential for outdoor lighting sources to produce glare that would be experienced by off-site viewers. In addition, the development plans would require installation of lighting fixtures with full cutoff fixtures and restriction of individual fixtures to not exceed 2,700 kelvin and 750 watts. With regard to glare, the proposed cargo building would feature non-reflective stucco-clad exterior walls and limited windows that would be located at the main building entrance and along the building's east elevation (near the main entrance), which would not be directed toward sensitive off-site ground-based receptors. As such, lighting and glare impacts would be less than significant.

Under Alternative 6, the project site would be developed in the same manner as the Proposed Project. Thus, Alternative 6 would contribute additional lighting to the area through the construction and operation of an air cargo center within the site, as well as through aircraft flight operations after sundown. Similar to the Proposed Project, development under this alternative would generate construction light and glare, and the applicant would be required to submit Form 7460-1, Notice of Proposed Construction or Alteration, to FAA. With submittal of this form and completion of a review of the proposed construction and alteration by FAA (and identification of needed temporary lighting measures), in conjunction with the short duration and assumed infrequency of necessary nighttime construction, construction of this alternative would not create a new source of substantial light or glare

that would adversely affect day- or nighttime views in the area, resulting in a less-than-significant impact, the same as the Proposed Project. Regarding operational light and glare impacts, Alternative 6 would implement development plans to ensure that operational light and glare impacts would be less than significant, the same as the Proposed Project. Lastly, regarding March ARB taxiway lighting impacts, because Alternative 6 would result in the same alterations to existing Taxiways A and G within March ARB, the project applicant would be required to submit FAA Form 7460-1, and because any new lighting constructed within Taxiways A, C, and G would be similar to and consistent with the existing March ARB lighting surrounding the project site, Alternative 6 would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. However, because no flight operations would occur between 10:00 p.m. and 11:00 p.m. and annual flight operations would be reduced by approximately 30%, Alternative 6 would result in less overall lighting and potential glare associated with aircraft operations. Additionally, the reduced annual aircraft operations would achieve a related reduction in distribution truck traffic; therefore, Alternative 6 would result in overall reduced nighttime lighting and glare impacts. Impacts would be less than significant, the same as the Proposed Project. Thus, Alternative 6 would result in reduced aesthetic impacts compared to the Proposed Project.

Air Quality

As discussed in Section 3.2, Air Quality, implementation of the Proposed Project would result in construction emissions that do not exceed the SCAQMD regional construction thresholds. Implementation of MM-AQ-1 (Construction Management Plan), which requires the Proposed Project to use Tier 4 off-road-construction equipment, and MM-AQ-2 (Construction Requirements) would further reduce construction emissions and impacts would remain less than significant. Regional operational air quality impacts would be potentially significant, as the Proposed Project's daily regional emissions from ongoing non-peak and peak operations would exceed the thresholds of significance for emissions of VOCs, NOx, and CO. The exceedance of the regional operational thresholds for VOCs, NOx, and CO would be primarily due to the Proposed Project's flight operations. The project applicant would implement MM-AQ-1 through MM-AQ-6 to reduce the Proposed Project's operational VOC, NOx, and CO emissions; however, there is no meaningful way to quantify these reductions in CalEEMod; therefore, no numeric emissions credit was taken in the analysis. Therefore, the Proposed Project's regional operational VOC, NOx, and CO emissions would be significant and unavoidable. The Proposed Project would not result in an exceedance of SCAQMD's localized significance thresholds, would not cause a CO hotspot, and would not cause a toxic air contaminant health risk impact. Accordingly, impacts to sensitive receptors and those related to odors would be less than significant.

Construction of Alternative 6 would result in the same less-than-significant construction air quality emissions generated as those identified for the Proposed Project. Alternative 6 would incorporate MM-AQ-1 and MM-AQ-2, which would further reduce construction emissions, the same as the Proposed Project.

Regarding operational emissions, Alternative 6 would reduce operational activities by approximately 30% compared to the Proposed Project. Under Alternative 6, the total annual flight operations generated by the Proposed Project (10,608 annual operations) would be reduced by approximately 30%, resulting in a total of 7,488 annual operations. Thus, it can be estimated that total maximum daily emissions from aircraft sources for Alternative 6 would be reduced by approximately 30%, when assuming the same type of aircraft would be used under this alternative. Operation of the air cargo center would similarly be reduced by approximately 30%. In addition, under Alternative 6, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Thus, flight operations under Alternative 6 would occur only from 7:00 a.m. to 10:00 p.m.

CalEEMod utilizes summer and winter EMFAC2021 emission factors to derive vehicle emissions associated with Alternative 6 operational activities, which vary by season. Table 5-15 provides the daily operational emission estimates assuming an approximately 30% reduction in annual operations. Tables 5-16 and 5-17 compare Alternative 6's operational emissions to the Proposed Project's Non-Peak and Peak operational emissions. As shown in these tables, with an approximately 30% reduction in annual operations, the total maximum daily emissions of VOC, NO_x, and CO would be reduced but would still exceed the applicable thresholds. Alternative 6 would also implement MM-AQ-3 through MM-AQ-6 to reduce the operational VOC, NO_x, and CO emissions, but impacts would remain significant and unavoidable. Alternative 6 would result in **reduced air quality impacts** compared to the Proposed Project but impacts would still be significant and unavoidable.

Table 5-15. Alternative 6 Operational Emissions

	Emissions (Pounds per Day)					
Source	voc	NO _x	со	SO _x	PM ₁₀	PM _{2.5}
Summer						
Mobile source	3.35	17.00	45.99	0.22	12.90	3.50
Area source	5.95	0.07	7.86	0.00	0.01	0.01
Energy source	0.05	0.93	0.78	0.01	0.07	0.07
On-site equipment source	0.16	0.53	23.22	0.00	0.04	0.04
Aircraft source ^a	113.75	392.99	516.51	29.28	4.08	4.07
Total Maximum Daily Emissions	123.26	411.51	594.36	29.52	17.11	7.68
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No
Winter						
Mobile source	3.20	17.89	37.91	0.22	12.90	3.50
Area source	4.66	0.00	0.00	0.00	0.00	0.00
Energy source	0.05	0.93	0.78	0.01	0.07	0.07
On-site equipment source	0.16	0.53	23.22	0.00	0.04	0.04
Aircraft source ^a	113.75	392.99	516.51	29.28	4.08	4.07
Total Maximum Daily Emissions	121.83	412.33	578.42	29.51	17.10	7.67
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	Yes	Yes	Yes	No	No	No

Source: Appendix S-3.

Notes: VOC = volatile organic compound; 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; <0.01 = reported emissions are less than 0.01; SCAQMD = South Coast Air Quality Management District.

a Assumes an approximately 30% reduction in total annual flight operations compared to the Proposed Project. Aircraft characteristics utilized for estimating aircraft emissions under the Proposed Project assumed 10,608 annual operations occurring from the March ARB Air Cargo facilities (5,304 arrivals and 5,304 departures; refer to Appendix B-1).

Table 5-16. Comparison of Alternative 6 and Proposed Project (Non-Peak)
Operational Emissions

	Emissions (Pounds per Day)					
Source	voc	NO _x	СО	SO _x	PM ₁₀	PM _{2.5}
Summer						
Proposed Project Total Maximum Daily Emissions	185.42	619.09	942.77	42.29	25.60	10.46
Alternative 6 Total Maximum Daily Emissions	121.83	412.33	578.42	29.51	17.10	7.67
Difference	-63.59	-206.76	-364.35	-12.78	-8.50	-2.79
Percent Reduction	-34.3%	-33.4%	-38.6%	-30.2%	-33.2%	-26.7%

Source: Table 3.2-11, Table 5-15.

Table 5-17. Comparison of Alternative 6 and Proposed Project (Peak)
Operational Emissions

	Emissions (Pounds per Day)						
Source	voc	NO _x	СО	SO _x	PM ₁₀	PM _{2.5}	
Winter							
Proposed Project Total Maximum Daily Emissions	215.53	682.42	978.27	45.98	26.24	11.03	
Alternative 6 Total Maximum Daily Emissions	121.83	412.33	578.42	29.51	17.10	7.67	
Difference	-93.7	-270.09	-399.85	-16.47	-9.14	-3.36	
Percent Reduction	-43.5%	-39.6%	-40.9%	-35.8%	-34.8%	-30.5%	

Source: Table 3.2-12, Table 5-15.

Biological Resources

As discussed in Section 3.3, Biological Resources, implementation of the Proposed Project would result in less-than-significant biological resources impacts with implementation of MM-BIO-1A through MM-BIO-5. In regard to impacts to burrowing owls, MM-BIO-1A (Burrowing Owl Avoidance and Minimization Measures) requires pre-construction survey buffers for occupied burrows, and monitoring during construction to ensure complete avoidance of the occupied burrows; MM-BIO-1B (Burrowing Owl Relocation and Mitigation Plan) requires the preparation of a Burrowing Owl Relocation and Mitigation Plan and habitat compensation for the loss of occupied habitat; and MM-BIO-2 (Best Management Practices) establishes measures that require clearly marking work limits; restricting vehicle speed limits to 15 mph or less to minimize the generation of fugitive dust; providing pet restrictions; providing measures to ensure that trash and debris are disposed of properly to minimize short-term impacts of increased human activities; and the incorporation of native, non-invasive landscaping to minimize the spread of non-native invasive plant and animal species. In regard to impacts to San Diego black-tailed jackrabbit, MM-BIO-2 would be implemented, as would MM-BIO-3 (San Diego Black-Tailed Jackrabbit Avoidance and Minimization Measures), which requires a pre-construction survey to be conducted 30 days prior to

ground-disturbing activities and the demarcation and avoidance of active maternity dens during the pup-rearing season (February 15 through July 1). Impacts to the California glossy snake would be mitigated through implementation of MM-BIO-2. Impacts to protected nesting birds would be mitigated through implementation of MM-BIO-4 (Nesting Bird Avoidance and Minimization Measures), which requires nesting bird surveys of impact areas; if active nests are found, the biologist must establish buffers and/or implement monitoring to avoid impacting avian nesting success. Regarding impacts to jurisdictional waters, MM-BIO-5 (Jurisdictional Waters Permitting and Regulatory Agency Permitting) would be implemented. This mitigation measure requires that compensatory mitigation be provided, that applicable resource agency permits be received prior to Proposed Project implementation, that equipment and spoil sites not be placed within or adjacent to aquatic resources, and that pollutants be contained to prevent contamination of soils and/or waterways. Impacts to all other biological resources would be less than significant without the need for mitigation.

Under Alternative 6, development within the project site would occur in the same manner as the Proposed Project. Grading and construction activity would occur within the exact same footprint as the Proposed Project, and all operational aspects that would impact biological resources would be the same as the Proposed Project. Therefore, implementation of MM-BIO-1A through MM-BIO-5 would be required, which would result in biological resources impacts that would be less than significant with mitigation incorporated, the same as the Proposed Project. Thus, implementation of Alternative 6 would result in the same level of biological resource impacts as the Proposed Project.

Cultural Resources

As discussed in Section 3.4, Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to archaeological resources with implementation of MM-CUL-1 (Archaeological Monitoring), which requires archaeological monitoring during all initial ground-disturbing activities; MM-CUL-2 (CRMTP), which requires the Principal Investigator, in conjunction with the Tribe(s), March ARB, MIPAAMarch JPA, and the construction manager, to develop a CRMTP prior to ground-disturbing activities; MM-CUL-3, which requires all construction personnel to complete a Cultural Resources Worker Sensitivity Training program (Training) prior to commencement of construction activities; MM-CUL-4 (Inadvertent Discovery of Archaeological Resources), which requires that all construction work occurring within 100 feet of a find to immediately stop until a qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, can evaluate the significance of the find; and MM-CUL-5, which requires a Phase IV Cultural Resources Monitoring Report that complies with MIPAA's March JPA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. In addition, MM-TCR-1 (Tribal Monitoring) is included in the Proposed Project to provide for tribal monitoring for all initial ground-disturbing activities, and impacts related to the discovery of human remains would be less than significant with implementation of MM-TCR-3 (Discovery of Human Remains), which requires handling in accordance with H&SC Section 7050.5 and California Public Resources Code Section 5097.98. Impacts related to historical resources would be less than significant.

Under Alternative 6, development within the project site would occur in the same manner as the Proposed Project, in that the Air Cargo Component and Off-Site Component under this alternative would be constructed within the same footprint as that planned for the Proposed Project. No grading or excavation activity would be proposed under Alternative 6 that would exceed the boundary of areas previously analyzed for potential cultural resource impacts. Because grading and excavation would occur under Alternative 6, implementation of MM-CUL-1 through MM-CUL-5, MM-TCR-1, and MM-TCR-3 would be required, which would ensure that impacts would be reduced to less than significant. Alternative 6 would not result in the potential to impact historical resources, as development would occur within the same footprint as that for the Proposed Project and would therefore not have the potential to

disturb historical resources, the same as the Proposed Project. Impacts would be less than significant with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 6 would result in **the same level of cultural resources impacts** as the Proposed Project.

Energy

As discussed in Section 3.5, Energy, construction and operation of the Proposed Project would result in less-than-significant impacts relating to wasteful, inefficient, or unnecessary consumption of energy resources. Mitigation for air quality (MM-AQ-2 through MM-AQ-5) and GHG emissions (MM-GHG-1), although its beneficial effects are not quantifiable with regard to energy and therefore are not included in the analysis, would provide co-benefits that would further reduce the demand for energy and minimize any potential energy impacts relating to conflict with or obstruction of state or local plans for renewable energy or energy efficiency. Impacts would remain less than significant.

Under Alternative 6, the project site would be constructed in the same manner as the Proposed Project; therefore, energy demands associated with construction would be the same as the Proposed Project and construction-related energy impacts would be less than significant. Alternative 6 would also implement MM-AQ-2 through MM-AQ-5 and MM-GHG-1. Once operational, Alternative 6 would consume the same amount of electricity and natural gas as the Proposed Project. As shown in the technical study prepared for this alternative by Urban Crossroads, fuel sources and energy use would be reduced compared to the Proposed Project, because Alternative 6 would result in a reduction of total flight operations by approximately 30% compared to the Proposed Project, resulting in total annual flight operations of 7,488 flights (Appendix S-3). This would yield an estimated annual fuel consumption of 1,642,059 gallons, which is a reduction of 703,684 gallons compared to the Proposed Project (Appendix S-3). Thus, with the reduction in annual flight operations, total energy demand would be decreased compared to the Proposed Project. The reduction of flights would result in less fuel consumption during operation. Impacts would remain less than significant under Alternative 6, the same as the Proposed Project. However, because less fuel would be consumed during operations, Alternative 6 would result in reduced energy impacts compared to the Proposed Project.

Geology and Soils

As discussed in Section 3.6, Geology and Soils, buildout of the Proposed Project would result in less-than-significant impacts through compliance with and implementation of the recommendations included in the project-specific Geotechnical Exploration Report (Appendix H). In addition, impacts related to paleontological resources would be less than significant with implementation of **MM-GEO-1** (Paleontological Monitoring Program), which requires monitoring for and recovery of any found paleontological resources. All other geology and soils impacts would be less than significant.

Under Alternative 6, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned for the Proposed Project. No grading or construction activity would be proposed under Alternative 6 that would exceed the boundary of areas previously analyzed, and all structures constructed within the project site and off-site work areas would be subject to compliance with the geotechnical recommendations contained in the Geotechnical Exploration Report for the Proposed Project (Appendix H). Through implementation of the geotechnical recommendations contained in the Geotechnical Exploration Report, impacts related to seismic ground shaking/seismic-related ground failure, liquefaction, liquefaction-induced lateral spreading, dry dynamic settlement, soil collapse/settlement, and expansive soils would be less than significant, the same as the Proposed Project. Regarding paleontological resources, because grading and excavation would occur under Alternative 6 in the same manner as that planned

by the Proposed Project and would occur within the same footprint as that for the Proposed Project, implementation of **MM-GEO-1** would be required, which would ensure that impacts to paleontological resources would be reduced to less than significant. Alternative 6 would not have the potential to disturb paleontological resources beyond what was analyzed for the Proposed Project. Impacts to geology and soils would be less than significant with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 6 would result in **the same level of geology and soils impacts** as the Proposed Project.

Greenhouse Gas Emissions

As discussed in Section 3.7, Greenhouse Gas Emissions, the Proposed Project would be consistent with SB 32, SB 375, and the County of Riverside's CAP with implementation of **MM-AQ-2** through **MM-AQ-6** and **MM-GHG-1** (Installation of EV Charging Stations). Therefore, the Proposed Project's GHG impacts would be less than significant with mitigation incorporated. For informational purposes, the annual GHG emissions associated with operation of the Proposed Project are estimated to be 23,054.04 MT CO₂e per year. Emission reductions from implementation of **MM-AQ-2** through **MM-AQ-6** are not readily quantifiable; therefore, no reduction in emissions was taken for those measures.

Under Alternative 6, the project site would be built out in the same manner as the Proposed Project; thus, construction GHG emissions would be the same. Alternative 6 would reduce operational activities by approximately 30% compared to the Proposed Project. Under Alternative 6, the total annual flight operations generated by the Proposed Project (10,608 annual operations) would be reduced by approximately 30%, resulting in a total of 7,488 annual operations. Thus, it can be estimated that total maximum GHG emissions from aircraft sources for Alternative 6 would be reduced by approximately 30%, when assuming the same type of aircraft would be used under this alternative. Operation of the air cargo center would similarly be reduced by approximately 30%. Operation of the air cargo center would similarly be reduced by approximately 30%. Implementation of MM-AQ-2 through MM-AQ-6 and MM-GHG-1 would be required under Alternative 6. Alternative 6 would be consistent with SB 32, SB 375, and the County of Riverside's CAP, similar to the Proposed Project. Therefore, Alternative 6's GHG impacts would be less than significant with mitigation incorporated. For informational purposes, the estimated total MT CO₂e emissions with mitigation and with an approximately 30% reduction in operations are provided in Table 5-18.

Table 5-18. Alternative 6 Greenhouse Gas Emissions (with Mitigation)

Emission Source	CO ₂ e Emissions (MT/yr) – Mitigated		
Annual construction-related emissions amortized over 30 years	24.83		
Mobile source	3,920.52		
Area source	3.67		
Energy source	322.81		
Water	103.72		
Waste	52.95		
Refrigerant leakage	30.42		
Cargo handling equipment	201.46		
Aircrafta	11,665.39		
Reductions from Electric Vehicle Charging Stations	-170		
Alternative 6 Total CO ₂ e Emissions (All Sources)	16,155.77		

Source: Appendix S-3.

Notes: $CO_2e = carbon dioxide equivalent; MT/yr = metric tons per year.$

a Assumes an approximately 30% reduction in total annual flight operations compared to the Proposed Project. Aircraft characteristics utilized for estimating aircraft emissions under the Proposed Project assumed 10,608 annual operations occurring from the March ARB Air Cargo facilities (5,304 arrivals and 5,304 departures; refer to Appendix G).

Because total GHG emissions would be reduced, Alternative 6 would result in **reduced GHG emissions impacts** compared to the Proposed Project.

Hazards and Hazardous Materials

As discussed in Section 3.8, Hazards and Hazardous Materials, implementation of the Proposed Project would result in less-than-significant impacts associated with Proposed Project construction with implementation of MM-HAZ-1 (Hazardous Materials Contingency Plan) and MM-HAZ-2 (Stop Work, Groundwater Management). MM-HAZ-1 requires the project applicant to develop an HMCP that addresses the potential impacts to soil, soil vapor, and groundwater beneath the project site. Additionally, MM-HAZ-1 requires the project applicant to submit the HMCP to EPA Region IX and the state for review prior to commencement of construction and/or soil disturbance activities on Site 7. MM-HAZ-2 requires work activities to cease should groundwater be encountered during excavation and/or construction activities. In addition, implementation of MM-HAZ-3 (Wildlife Protective Measures) would require that protective measures (e.g., security fencing) be placed to secure contaminated areas and prevent a hazard to human health or the environment (including wildlife). Impacts relating to safety hazards or excessive noise for nearby residents or workers within an airport land use compatibility plan area would be less than significant; all other hazards-related impacts from the Proposed Project would be less than significant with mitigation incorporated.

Under Alternative 6, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned for the Proposed Project. Demolition of existing structures, such as the tarmac, would occur in the same manner as the Proposed Project. No grading or excavation would be proposed under this alternative that would exceed the boundary of areas previously analyzed for potential hazards and hazardous material impacts. During construction of Alternative 6, a variety of hazardous materials, which would be the same as those used during construction of the Proposed Project, would be transported, stored, and used during construction activities. Any handling, transport, use, or disposal would comply with all applicable federal, state, and local regulations (as listed in Section 3.8.2 of the EIR), the same as the Proposed Project. Moreover, implementation of MM-HAZ-1 and MM-HAZ-2 would be required during construction of Alternative 6, which would ensure that potential impacts associated with exposure to soil, soil vapor, and groundwater beneath the project site would be less than significant with mitigation incorporated. In addition, Alternative 6 would incorporate MM-HAZ-3, which requires protective measures (i.e., security fencing) to secure contaminated areas and prevent a hazard to human health or the environment (including wildlife). However, with the approximately 30% reduction in operations, Alternative 6 would use a reduced amount of hazardous materials, such as fuel. Thus, Alternative 6 would result in reduced hazards and hazardous materials impacts compared to the Proposed Project.

Hydrology and Water Quality

As discussed in Section 3.9, Hydrology and Water Quality, implementation of the Proposed Project would result in less-than-significant impacts associated with water quality standards and groundwater with implementation of MM-HYD-1, MM-HAZ-1, MM-HAZ-2, and MM-AQ-6, which require the following: incorporation of water quality BMPs into the Project design (MM-HYD-1); development of an HMCP and submitting it to EPA Region IX and to the state for approval prior to commencement of construction and/or soil disturbance activities on Site 7 (MM-HAZ-1); ceasing of work activities should groundwater be encountered during the course of Proposed Project construction and either management of contaminated groundwater or alteration of construction plans to avoid further contact with contaminated groundwater (MM-HAZ-2); and sweeping of the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants (MM-AQ-6). All other hydrology and water quality impacts would be less than significant, and overall hydrology and water quality impacts would be less than significant with mitigation incorporated.

Under Alternative 6, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned for the Proposed Project. No grading or excavation activity are proposed under Alternative 6 that would exceed the boundary of areas previously analyzed for potential hydrology and water quality impacts. Therefore, any grading and change to the existing hydrological setting would occur in the same manner as the Proposed Project. Thus, implementation of MM-HYD-1, MM-HAZ-1, MM-HAZ-2, and MM-AQ-6 would be required. With implementation of these measures, impacts would be reduced to less than significant with mitigation incorporated, the same as the Proposed Project. Therefore, Alternative 6 would result in the same level of hydrology and water quality impacts as the Proposed Project.

Land Use and Planning

As discussed in Section 3.10, Land Use and Planning, construction and operation of the Proposed Project would result in less-than-significant land use and planning impacts with implementation of mitigation measures related to air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, noise, and transportation. Incorporation of MM-LU-1 (Occupancy Limits) would also avoid or minimize land use and planning impacts.

Under Alternative 6, development within the project site would occur in the same manner as the Proposed Project, in that the cargo building and all work to be completed within the project site and the off-site work areas would be constructed within the same footprint and in the same design as that planned under the Proposed Project. All structures would be constructed to the identical specifications called for in the site plans. Under Alternative 6, annual flight operations would be reduced by approximately 30% compared to the Proposed Project. Operation of the air cargo center would similarly be reduced by approximately 30%. Incorporation of MM-LU-1, as well as implementation of mitigation measures related to air quality, biological resources, cultural resources, geology and soils, GHG emissions, hazards and hazardous materials, noise, and transportation would be required under this alternative. Impacts would be less than significant with mitigation incorporated. As such, Alternative 6 would result in the same level of land use and planning impacts as the Proposed Project.

Noise

As discussed in Section 3.11, Noise, once operational, the Proposed Project would result in less-than-significant impacts associated with exposure of workers to excessive noise relating to potential aircraft noise levels within the cargo building, with implementation of MM-NOI-1 (Construction Worker Hearing Protection). MM-NOI-1 requires the project applicant to provide evidence that the subject plans contain requirements with respect to contractor(s) providing employees with personal protective equipment per 8 CCR, Section 5096, and OSHA information (e.g., Publication 3498). The cargo aircraft flight operations of the Proposed Project would result in an increase in the ambient noise environment. Noise impacts due to Proposed Project aircraft operations would be significant and unavoidable even with the application of feasible mitigation, MM-NOI-2 (Future Tenant Aircraft Fleet), which requires that prior to issuance of a certificate of occupancy a noise analysis be provided confirming the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR; absent such documentation, additional environmental review is required. Therefore, noise impacts due to Proposed Project's aircraft operations would be significant and unavoidable even with the application of feasible mitigation. The Proposed Project would have less-than-significant impacts related to potential sleep disturbance from nighttime aircraft operations.

Under Alternative 6, buildout of the project site would occur in an identical manner to the Proposed Project, in that the Air Cargo Center Component and all proposed taxiway, taxilane, and aircraft parking apron improvements; utility improvements; landscaping; and internal roadways/parking lots would be constructed in the exact same manner

as the Proposed Project and would require implementation of **MM-NOI-1**. The operational aspects would be reduced approximately 30% compared to the Proposed Project and no flight operations would occur during nighttime hours (10:00 p.m. to 7:00 a.m., with no flight operations occurring between 10:00 p.m. and 11:00 p.m.). The number of trips would be reduced by approximately 30%, as would annual flight operations, resulting in the total annual cargo aircraft operations of 7,488 flights. Because flight operations would be limited to the hours between 7:00 a.m. and 10:00 p.m., Alternative 6 would have no potential impact associated with sleep disturbance between the hours of 10:00 p.m. and 7:00 a.m. The noise level reduction obtained by eliminating the 5% of the operations that would occur between 10:00 p.m. and 11:00 p.m. and the overall approximately 30% reduction in flight operations compared with the Proposed Project would result in a reduction in aviation noise to less than significant as shown in Table 5-19, below.

Table 5-19. Alternative 6 Aircraft Operation Noise-Level Summary

	Baseline Aviation and Modeled Cargo Aircraft Noise Levels (dBA CNEL)			Alt 6 Contribution (dB CNEL) ^b		Exceedance? (of Relative Threshold or	
Receiver Location ^a	Baselined	Alt 6 Ops	Baseline + Alt 6 Ops	Non-peak Ops	Relative Threshold ^o	65 dBA CNEL due to Alt 6 Contribution)	
R5	65.5	57.8	66.0	+0.5	1.5	No	
R6	64.7	55.8	65.0	+0.3	3	No	
R7	65.2	55.8	65.5	+0.3	1.5	No	
R8	64.6	54.8	65.0	+0.4	3	No	
R9	64.2	54.8	64.5	+0.3	3	No	
R10	64.2	54.8	64.5	+0.3	3	No	
R11	63.5	53.8	64.0	+0.5	3	No	
R12	63.5	52.8	64.0	+0.5	3	No	
R13	63.6	52.8	64.0	+0.4	3	No	
R14	63.1	52.8	63.5	+0.4	3	No	
R15	57.0	49.9	58.0	+1.0	5	No	

Source: Appendix P.

Notes: dBA = A-weighted decibel; CNEL = community noise equivalent level; dB = decibel.

- a Aircraft noise receiver locations are shown in Figures 3.11-11 and 3.11-12.
- b The noise-level increase expected with the addition of Alternative 6 flight operations.
- c Significance increase criteria as shown in Table 3.11-25.
- d Baseline aircraft noise as shown in Table 3.11-4.

MM-NOI-2 would also be implemented under Alternative 6 to ensure any future tenant's aviation noise did not exceed the levels disclosed in this EIR. As previously stated, MM-NOI-2 requires that, prior to issuance of a certificate of occupancy, a noise analysis be provided confirming that the proposed tenant's aircraft fleet mix would not exceed the noise levels disclosed in this EIR and that absent such documentation, additional environmental review is required as part of a discretionary action to revise the conditions of approval. Because Alternative 6 would have no potential sleep disturbance impact and a reduced noise level increase due to aircraft operations, Alternative 6 would reduce the Proposed Project's significant and unavoidable aviation noise impacts to less than significant with mitigation incorporated.

Transportation

As discussed in Section 3.12, Transportation, construction of the Proposed Project would result in a VMT per employee of 23.12, which is below the WRCOG significance threshold of 25.47 VMT per employee (approximately 9.23% below the threshold). Therefore, the Proposed Project's VMT impact would be less than significant. All other transportation-related impacts would be less than significant or less than significant with mitigation incorporated. In addition, the Proposed Project would incorporate PDF-TRA-1 (Payment of Fair-Share Cost) and would require implementation of MM-TRA-1 (Construction Traffic Management Plan) and MM-TRA-2 (Project Truck Route on Heacock Street). PDF-TRA-1 requires the Proposed Project to contribute its fair share toward intersection improvement measures. MM-TRA-1 requires the applicant to develop and implement a project-specific Construction Traffic Management Plan (CTMP) approved by MIPAAMarch JPA, and MM-TRA-2 requires all Proposed Project truck traffic to utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. Overall transportation impacts under the Proposed Project would be less than significant with mitigation incorporated.

Under Alternative 6, the project site would be built out in the same manner as the Proposed Project. Under Alternative 6, annual flight operations would be reduced by approximately 30% compared to the Proposed Project. Operation of the air cargo center would similarly be reduced by approximately 30%. Alternative 6 would incorporate PDF-TRA-1, MM-TRA-1, and MM-TRA-2. Operations would be reduced by approximately 30%, and the employee count under this alternative would also be reduced by approximately 30% compared to the Proposed Project. Thus, the employee trip generation rate would be less than the Proposed Project, and this alternative's impact based on VMT would be less than significant, the same as the Proposed Project. Therefore, Alternative 6 would result in reduced transportation impacts compared to the Proposed Project.

Tribal Cultural Resources

As discussed in Section 3.13, Tribal Cultural Resources, buildout of the Proposed Project would result in less-than-significant impacts to TCRs with implementation of MM-TCR-1 (Tribal Monitoring), which requires the project applicant/developer to retain a qualified tribal monitor to monitor all initial ground-disturbing activities; MM-TCR-2 (Final Disposition), which provides protocols for treatment of inadvertent discoveries of TCRs and human remains; MM-TCR-3 (Discovery of Human Remains), which provides protocols for dealing with discovery of human remains; and MM-TCR-4 (Non-Disclosure), which restricts the dissemination of locational information regarding reburied Native American human remains and associated grave goods. In addition, MM-CUL-1 (Archaeological Monitoring) requires archaeological monitoring of all mass grading and trenching activities, and MM-CUL-3 (Cultural Resources Worker Sensitivity Training) requires cultural/historical sensitivity training for personnel on site. Impacts related to TCRs that are listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC Section 5020.1(k) would be less than significant with mitigation incorporated.

Under Alternative 6, development within the site would occur in the same manner as that proposed by the Project; thus, grading and excavation activities within the site would occur, resulting in the potential to impact TCRs. Therefore, implementation of MM-TCR-1 through MM-TCR-4 and MM-CUL-1 and MM-CUL-3 would be required. With implementation of these mitigation measures, Alternative 6 would result in a less-than-significant impact with mitigation incorporated, the same as the Proposed Project. Thus, Alternative 6 would result in the same level of impacts to TCRs as the Proposed Project.

Utilities and Service Systems

As discussed in Section 3.14, Utilities and Service Systems, the Proposed Project would have less-than-significant impacts to facilities providing water, wastewater, stormwater, electric power, natural gas, and telecommunications. There are sufficient water supplies available and wastewater treatment capacity to serve the Proposed Project, resulting in less-than-significant impacts. The Proposed Project would have no impact on solid waste infrastructure and capacity and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, resulting in less-than-significant impacts. Therefore, the Proposed Project's impacts to utilities and service systems would be less than significant and no mitigation is required.

Under Alternative 6, development within the project site would occur in the same manner as that planned for the Proposed Project. Under Alternative 6, annual flight operations would be reduced by approximately 30% compared to the Proposed Project. Operation of the air cargo center would similarly be reduced by approximately 30%. Thus, Alternative 6 would result in less-than-significant impacts related to facilities providing water, wastewater, stormwater, electric power, natural gas, and telecommunications. Alternative 6 would require a reduced level of water and wastewater treatment capacity compared to the Proposed Project. In addition, Alternative 6 would result in a reduced amount of solid waste generated during the construction and grading process and the operation of the Proposed Project, because the development of the site and the number of employees would be the same as the Proposed Project but annual flight operations and air cargo operations would be reduced by approximately 30%, thereby resulting in less-than-significant impacts relating to solid waste. Thus, Alternative 6 would result in a reduced level of impacts to utilities and service systems compared to the Proposed Project.

Other CEQA Considerations – Effects Found Not to Be Significant

As discussed in Section 4.2, Effects Found Not to Be Significant, the Proposed Project would have no impacts to scenic resources within a state scenic highway, conversion of farmland to non-agricultural use, conflict with zoning for agricultural use or Williamson Act contract, conflict with zoning for forest land or timberland, loss of forest land or conversion of forest land to non-forest use, conversion of farmland to non-agricultural use or forest land to non-forest use, septic tanks/alternative wastewater disposal systems, emission or handling of hazardous materials within 0.25 miles of a school, physical division of an established community, loss of a known mineral resource, loss of a locally important mineral resource recovery site, displacement of people or housing, construction or expansion of recreational facilities, and requirement of installation or maintenance of infrastructure that may exacerbate wildfire risk or result in temporary or ongoing impacts to the environment.

The impacts of Alternative 6 would be the same as the Proposed Project and there would be no impact as to these issues for the reasons set forth in Section 4.2.

The Proposed Project would have less-than-significant impacts to scenic vistas, visual character or quality, rupture of a known earthquake fault, landslides, soil erosion or loss of topsoil, interference with an adopted emergency response plan or emergency evacuation plan, exposure of people or structures to significant risk of loss, injury, or death involving wildland fires, geometric design feature or incompatible use hazards, inadequate emergency access, impairment of an adopted emergency response or evacuation plan, exacerbation of wildfire risks that could expose occupants to pollutant concentrations from a wildfire or to uncontrolled spread of wildfire, and exposure of occupants to flooding risk or landslides as a result of runoff, post-fire instability, or drainage changes.

The impacts of Alternative 6 would be the same as the Proposed Project and there would be a less than significant impact as to these issues for the reasons set forth in Section 4.2.

The Proposed Project would have less-than-significant impacts to substantial unplanned population growth, fire protection, police protection, schools, parks, and other public facilities, and deterioration of existing parks.

Alternative 6 would reduce Proposed Project operations by approximately 30%. The impacts of Alternative 6 would be less than the Proposed Project and there would be a less than significant impact as to these issues for the reasons set forth in Section 4.2.

Significant Irreversible Changes

As discussed in Section 4.4, Significant Irreversible Changes, the construction of the Proposed Project would result in the use of nonrenewable resources and energy sources, including fossil fuels, natural gas, and electricity. Proposed Project impacts related to consumption of nonrenewable resources during construction are considered to be less than significant because the Proposed Project would not use unusual or wasteful amounts of energy or construction materials. Although irretrievable commitments of resources would result from construction of the Proposed Project, such impacts would be less than significant.

The use of nonrenewable resources and energy sources for the construction of Alternative 6 would be the same as the Proposed Project and there would be a less than significant impact as to irretrievable commitments of resources during construction of Alternative 6 for the reasons set forth in Section 4.4.

Once operational, the Proposed Project would also require energy resources, such as electricity, natural gas, and various transportation-related fuels, including jet fuel to serve airplanes. Although the resources used for the Proposed Project would be permanently committed and therefore would be considered irreversible, the Proposed Project would not consume an unusual or wasteful amount of energy or materials and would comply with California Building Energy Efficiency Standards (24 CCR Part 6). In addition, the Proposed Project would implement mitigation measures, including MM-AQ-1 through MM-AQ-6 and MM-GHG-1, that would serve to reduce the Proposed Project's use of nonrecoverable materials and energy. The Proposed Project design and associated utilities are all subject to regulations that are working to reduce the amount of nonrenewable resources used by development projects. Although sustainability measures would reduce the materials and energy used during construction and operation of the Proposed Project, these resources would nevertheless be unavailable for other uses. The resources used for the Proposed Project would be permanently committed and therefore would be considered irreversible.

Alternative 6 would reduce Proposed Project operations by approximately 30%. Alternative 6 operations would use less energy resources than the Proposed Project, would comply with California Building Energy Efficiency Standards (24 CCR Part 6), and implement mitigation measures, including MM-AQ-1 through MM-AQ-6 and MM-GHG-1, that would serve to reduce Alternative 6's use of nonrecoverable materials and energy. The resources used for Alternative 6 operations would be less than the Proposed Project but would be permanently committed and therefore would be considered irreversible. for the reasons set forth in Section 4.4.

Regarding uses in which irreversible damage could result from any potential environmental incidents associated with the Proposed Project, irreversible impacts may also occur from environmental damage, such as spill or release of hazardous materials or accidental fire resulting from mechanical or industrial failure. Although there are many other types of accidents possible, those listed above represent the key sources for irreversible damage that can be associated with the types of future development proposed. However, it is assumed that all new uses of hazardous materials would occur pursuant to applicable laws and regulations. That is, industrial uses involving hazardous materials would obtain and comply with a valid materials license specifying the requisite safety measures for the use, handling, storage, transportation, and disposal of these materials. In addition, the Proposed Project would implement mitigation measures, including MM-HAZ-1 through MM-HAZ-3, that would serve to ensure that impacts

related to hazardous material releases or spills would be avoided. Therefore, this would not be considered a significant irreversible environmental effect or cause irreversible environmental damage.

With the approximately 30% reduction in operations, Alternative 6 would use a reduced amount of hazardous materials, such as fuel. The impacts of Alternative 6 would be less than the Proposed Project and there would be a less than significant impact with implementation of **MM-HAZ-1** through **MM-HAZ-3** for the reasons set forth in Section 4.4.

Growth-Inducing Impacts

As discussed in Section 4.5, Growth-Inducing Impacts, the Proposed Project would indirectly stimulate population growth through the addition of new employees/staff. This growth would be consistent with employment growth envisioned in local and regional land use plans and in projections made by regional planning authorities, because the planned growth of the Proposed Project and its land use intensity have been factored into the underlying growth projections of the SCAG 2020 2045 RTP/SCS. Therefore, the Proposed Project is not growth inducing.

Alternative 6 would reduce Proposed Project operations by approximately 30%, also reducing any stimulated population growth. Therefore, Alternative 6 would not be growth inducing for the reasons set forth in Section 4.5.

5.4.7.2 Project Objectives

Under Alternative 6, the project site would be built out in the same manner as the Proposed Project. Under this alternative, no flight operations would occur between 10:00 p.m. and 11:00 p.m. (approximately 5% of the Proposed Project's flight operations). Annual flight operations would be reduced by approximately 30% compared to the Proposed Project. Alternative 6 restricts a higher percentage of flight operations to daytime hours (7:00 a.m. to 7:00 p.m.) than the Project. Operation of the air cargo center would similarly be reduced by approximately 30%. Table 5-20 provides a list of the project objectives and whether Alternative 6 meets each objective. As discussed in this table, Alternative 6 would meet all project objectives, but to a lesser extent than the Proposed Project.

Table 5-20. Alternative 6 Success at Meeting Project Objectives

Project Objective Alternative Meets Objective? More fully utilize the operations capacity Yes. Development of this alternative would result in the provision of the March Inland Port Airport to meet of additional air cargo operations that would more fully utilize the regional demands for air cargo services operations capacity of MIP Airport to meet regional demands for within Southern California and the greater air cargo services within Southern California and the greater region, thereby alleviating congestion and region. However, this alternative would result in a reduction of overtaxed air and roadway facilities within annual flight operations compared to the Proposed Project, which would not help to alleviate congestion or overtaxed air and the greater region. roadway facilities within the greater region to the same extent as the Proposed Project. Therefore, this alternative would meet this project objective, albeit to a lesser extent than the Proposed Project. Yes. As discussed in the environmental analysis above, the project Provide appropriate land use intensities to comply with the parameters of the site would be constructed in the same manner to that proposed by March Air Reserve Base/Inland Port the Proposed Project and would provide a land use (aviation) that Airport Compatibility Plan. is consistent with the allowed uses of the March ARB/Inland Port ALUCP. Alternative 6 would implement the same Plot Plan associated with the Proposed Project, resulting in the construction

Table 5-20. Alternative 6 Success at Meeting Project Objectives

Project Objective	Alternative Meets Objective?
	of the cargo building and tarmac extensions and improvements. Thus, Alternative 6 would result in the provision of a land use intensity (aviation facility) that would comply with the parameters of the March ARB/Inland Port ALUCP. As such, Alternative 6 would achieve this project objective.
Avoid impacts to, or impediment of, the remediation of the burn areas within Site 7.	Yes. Development of this alternative would have the same footprint as the Proposed Project and would avoid impacts to the burn areas of Site 7.
Provide increased job opportunities for local residents through the provision of employment-generating businesses.	Yes. Implementation of Alternative 6 would result in the generation of jobs, albeit to a lesser extent than the Proposed Project. Therefore, Alternative 6 would meet this project objective, albeit to a lesser extent than the Proposed Project.
Improve access for airport users to the existing taxiways.	Yes. Development of Alternative 6 would result in the same taxiway extensions and realignments planned under the Proposed Project to provide aircraft access from the project site to the existing taxiways within March ARB. Therefore, Alternative 6 would meet this project objective.
Facilitate development of aviation uses other than federal military aviation.	Yes. Implementation of Alternative 6 would result in the development of civil aircraft aviation uses, as allowed by the joint use agreement between MIPAA and DAF. The total annual flights under this alternative would be consistent with the joint use agreement and Air Installations Compatible Use Zone terms. Therefore, Alternative 6 would meet this project objective.

Notes: MIP = March Inland Port; ARB = Air Reserve Base; ALUCP = Airport Land Use Compatibility Plan; DAF = U.S. Department of the Air Force.

III.3.5.2 Section 5.5, Environmentally Superior Alternative

NOTE: Changes to this section related to the new alternatives are shown in strikethrough/underline.

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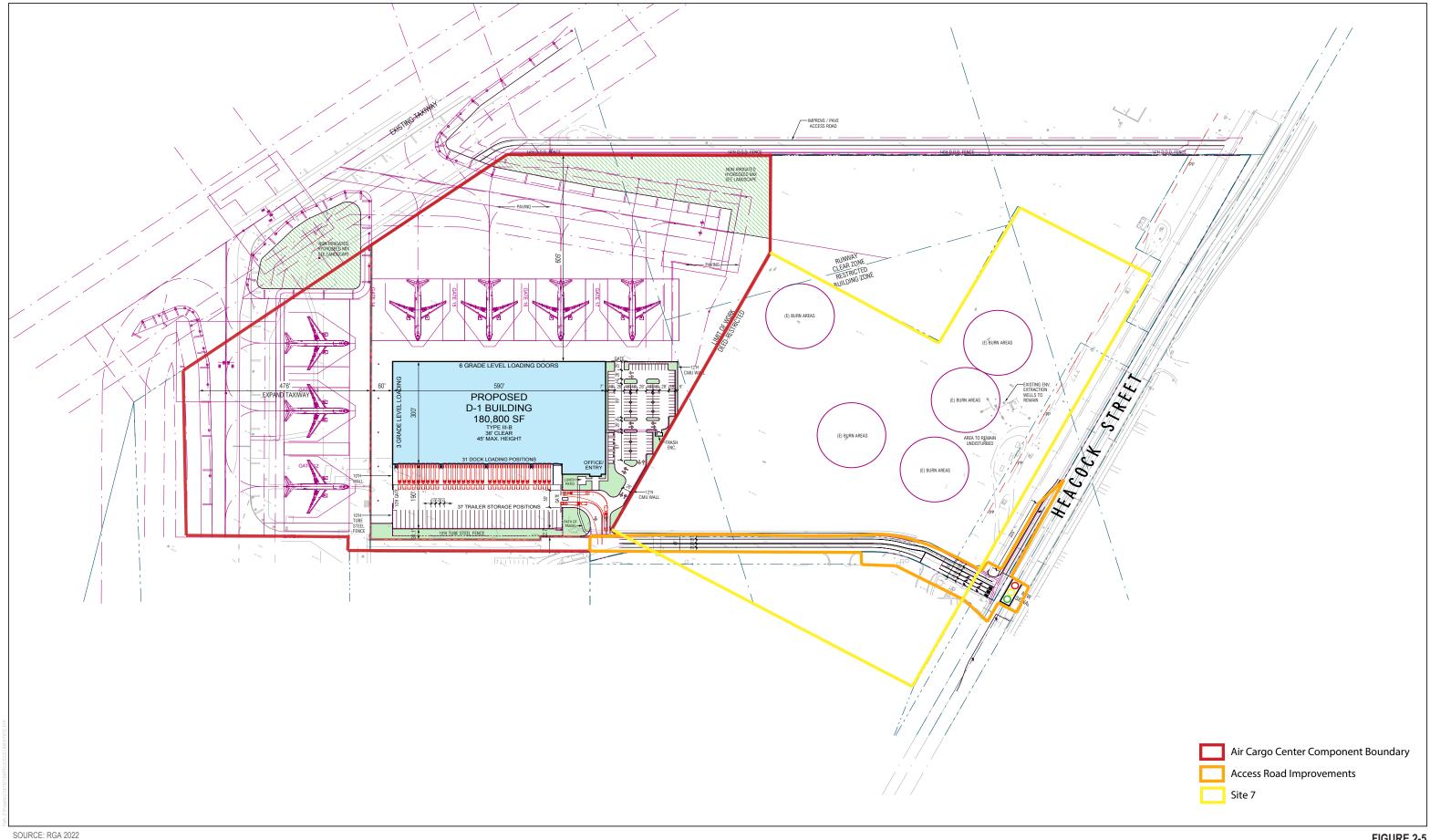
5.5 Environmentally Superior Alternative

As indicated in Table 5-1, Alternative 1, the No Project Alternative, would result in no environmental impacts and would be the environmentally superior alternative. However, it would not meet most of the project objectives, and Section 15126.6(e)(2) of the CEQA Guidelines states that if the environmentally superior alternative is the No Project Alternative, the EIR must also identify an environmentally superior alternative among the other alternatives.

Alternative 4, the Private Aircraft Services Alternative, would be the Environmentally Superior Alternative (refer to Table 5-1) because it would have the most reductions in impacts compared to the Proposed Project. Alternative 4 would accommodate private aircraft, rather than commercial aircraft, and would not meet regional demands for air cargo services (Objective 1) in contrast to the Proposed Project. Although Alternative 2, Nighttime Flight Noise Reduction, and Alternative 3, Reduced Flight Operations, Alternative 5, Reduced Operation/No Nighttime Flights, and Alternative 6, Reduced Aviation Noise, would both meet all of the project objectives, in comparison to Alternative 4 (which would meet five of the six objectives). However, Alternative 4 would achieve most, but not all,

project objectives and would have fewer impacts compared to Alternatives 2 and 3, 5 and 6. Alternative 6 would meet all project objectives to a lesser extent than the Proposed Project, but would reduce the Proposed Project's significant and unavoidable aviation noise impact to less than significant with mitigation incorporated.

Alternative 2 would reduce nighttime flight operations and overall noise, but noise impacts would remain significant and unavoidable. The same number of annual flights would occur under this alternative as under the Proposed Project, resulting in the same significant and unavoidable air quality impacts. Alternative 3 would reduce flight operations by 10% compared to the Proposed Project, reducing emissions and overall noise; however, air quality and noise impacts would remain significant and unavoidable. Alternative 5 would reduce flight operations by 10% and no flight operations would occur during evening hours between 10:00 p.m. and 11:00 p.m., as compared to the Proposed Project; however, the reduced air quality and noise impacts would remain significant and unavoidable. Alternative 6 would reduce flight operations by approximately 30% with no nighttime flight operations; aviation noise impacts would be less than significant but the reduced air quality impacts would remain significant and unavoidable.



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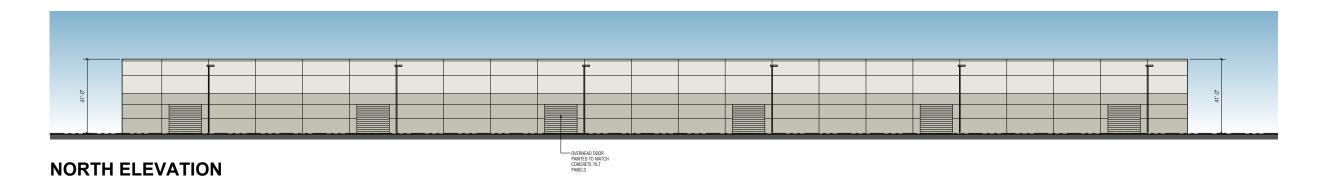
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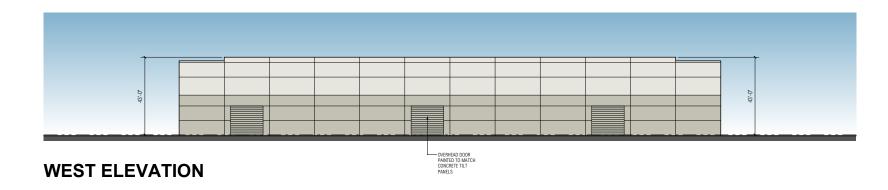
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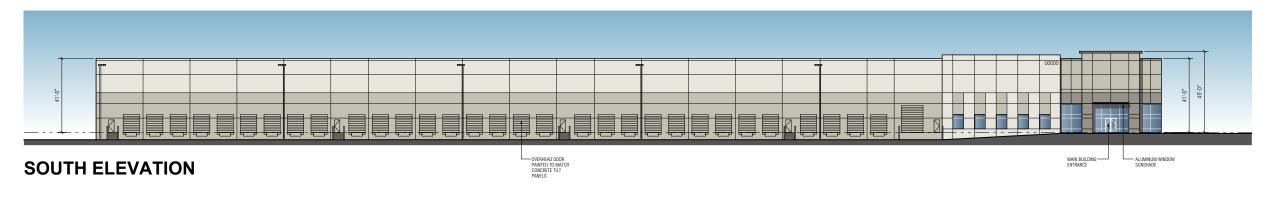
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EAST ELEVATION



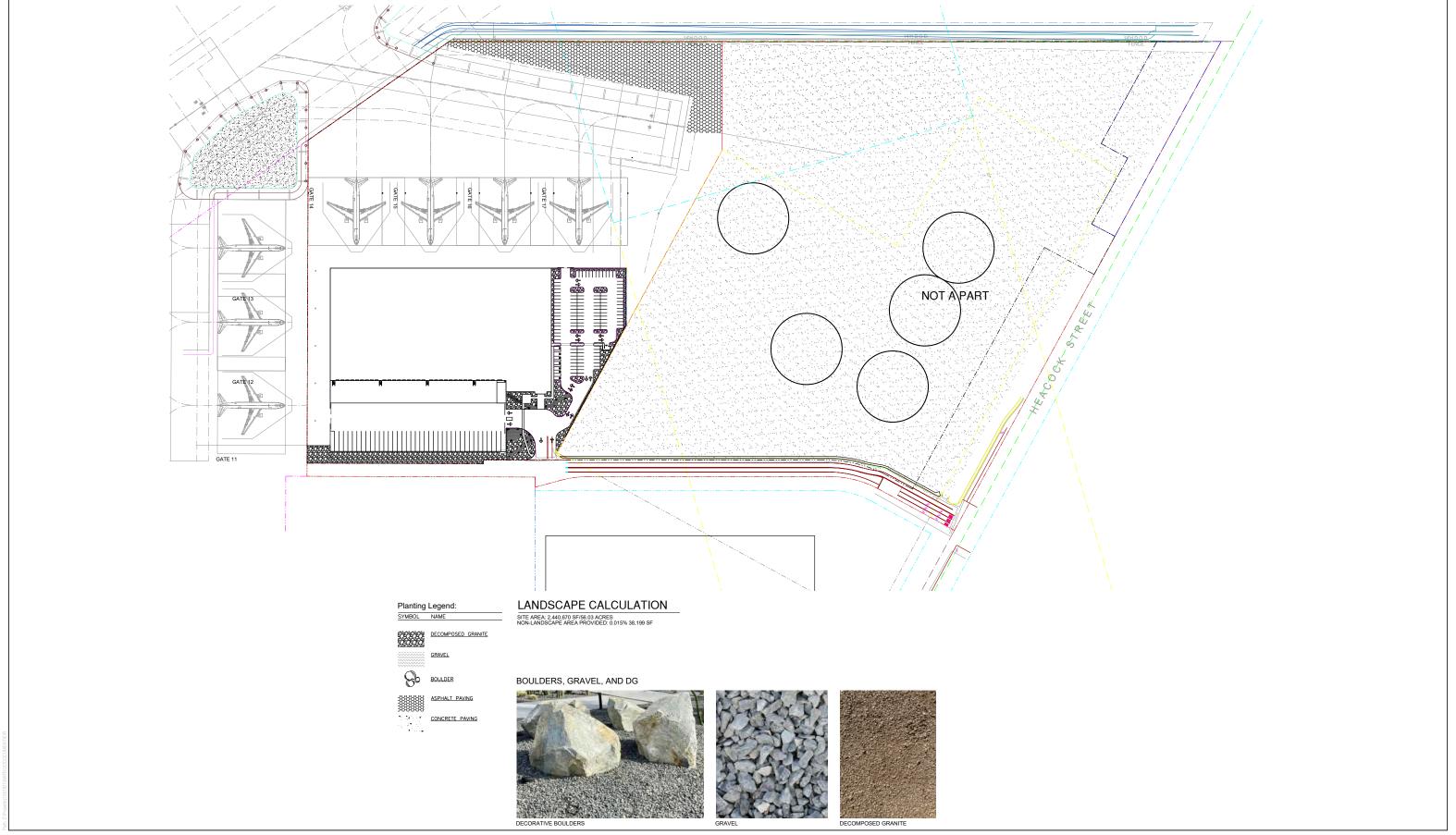




SOURCE: RGA Office of Architectural Design 2022

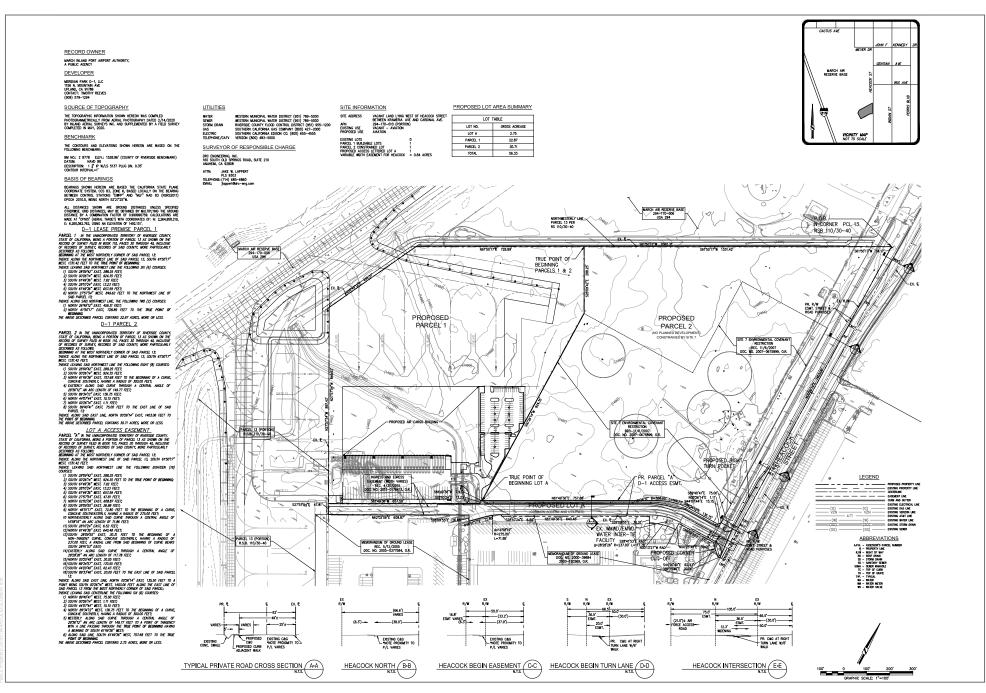
1. FIELD COLOR: SHERWIN WILLIAMS SW 9173 SHITAKE
 2. ACCENT COLOR: SHERWIN WILLIAMS SW 7507 STONE LION
 3. BASE COLOR: SHERWIN WILLIAMS SW 7508 TAVERN TAUPE

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SOURCE: Hirsch and Associates, Inc. 2025

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IV Mitigation Monitoring and Reporting Program

California Public Resources Code Section 21081.6 requires that, upon certification of an EIR, "the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

This chapter contains the mitigation monitoring and reporting program (MMRP) that has been developed for the Meridian D-1 Aviation Center Project (Proposed Project). This MMRP has been developed in compliance with Public Resources Code Section 21081.6 and Section 15097 of the CEQA Guidelines. The Project Design Features (PDFs) and mitigation measures in the table are coded by alphanumeric identification consistent with the EIR. The following items are identified for each PDF and mitigation measure:

- Monitoring. This section of the MMRP lists the stage of the Proposed Project during which the PDF or mitigation measure would be implemented and the stage during which proper implementation would be monitored and verified. It also lists the agency that is responsible for ensuring that the PDF or mitigation measure is implemented and that it is implemented properly.
- Verification of Compliance. This section of the MMRP provides a location for the implementing party and/or
 enforcing agency to make notes and to record their initials and the compliance date for each PDF and
 mitigation measure.

This MMRP shall be enforced throughout all phases of the Proposed Project. The Applicant or its successor shall be responsible for implementing each Project Design Feature and mitigation measure and shall maintain records demonstrating compliance with each Project Design Feature and Mitigation Measure.

After review and approval of the final MMRP by the lead agency, minor changes and modifications to the MMRP are permitted, but can only be made by the Applicant or its successors subject to Lead Agency approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMRP and the need to protect the environment with a workable program. No changes will be permitted unless the MMRP continues to satisfy the requirements of CEQA, as determined by the lead agency.

PDFs are listed first for each environmental topic, with mitigation measures (MMs) related to each specific threshold following the PDFs.

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Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting				Verification of Compliance		
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments	
Air Quality							
Mitigation Measures							
MM-AQ-1. Construction Management Plan.	Prior to issuance of a	Review and approval of construction	MIPAA				
Prior to the issuance of a grading permit, the applicant shall prepare and submit to the March Inland Port Airport Authority (MIPAA) for approval a Construction Management Plan to ensure that off-road diesel construction equipment rated at 50 horsepower or greater complies with U.S. Environmental Protection Agency/California Air Resources Board Tier 4 off-road emissions standards or equivalent and that all construction equipment is tuned and maintained in accordance with the manufacturer's specifications. All equipment maintenance records and data sheets, including design specifications and emission control tier classifications, shall be kept on site and furnished to MIPAA or other regulators upon request.	grading permit	management plan submitted by the Grading and/or Building Superintendent					
MM-AQ-2. Construction Requirements.	Prior to issuance of a	Review and approval of construction	MIPAA				
 Prior to issuance of a grading permit and/or building permit, the applicant shall provide evidence to March Inland Port Airport Authority (MIPAA) that the subject plans contain the following requirements and restrictions: A. 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 24). B. Active ground disturbance shall not exceed 20 acres per day. C. 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. D. No construction equipment idling longer than 3 minutes shall be permitted. No off-road diesel-powered equipment shall be in the "on" position for more than 8 hours per day. E. No diesel-powered portable generators shall be used, unless necessary due to emergency situations or constrained supply. F. Contractor required to provide transit and ridesharing information to on-site construction workers. G. Contractor required to establish location for food or catering truck service to construction workers and to cooperate with food service providers to provide consistent food service. H. Use of electric-powered hand tools, forklifts, and pressure washers, to the extent feasible. I. Designation of an area in the construction site where electric-powered construction vehicles and equipment can charge. J. Project will utilize "Super-Compliant" low volatile organic compound (VOC) paints that have been reformulated to exceed the regulatory VOC limits put forth in the South Coast Air Quality Management District's Rule 1113. Super-Compliant low VOC paints shall be no more than 10 grams per liter (g/L) of VOC. Alternatively, the applicant m	grading permit and/or building permit	plans submitted by the Grading and/or Building Superintendent					
do not require the use of architectural coatings. MM-AQ-3. Improved Energy Efficiency and Water Reduction.	Prior to issuance of a	Review and approval of building and	MIPAA				
A. Building Design – Prior to issuance of a building permit, March Inland Port Airport Authority (MIPAA) shall confirm that building plans include the following: 1. Building constructed to achieve 2023 Leadership in Energy and Environmental Design (LEED) Silver certification standards or equivalent, at a minimum. 2. Energy Star-certified light bulbs and light fixtures.	building permit; prior to issuance of a certificate of occupancy	landscape plans, and any tenant agreements submitted					

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting		Verification of Compliance			
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
3. Duct insulation to a minimum level (R-6) of and modestly enhanced window insulation (0.28						
or less U-factor, 0.22 or less solar heat-gain coefficient [SHGC]).						
 A modest cool roof, defined as Cool Roof Rating Council Rated 0.15 aged solar reflectance and 0.75 thermal emittance. 						
5. Heating, ventilation, and air conditioning equipment with a season energy efficiency ratio of 14 or higher and energy efficiency ratio [EER] 14/78% annual fuel utilization efficiency [AFUE] or 8 heating seasonal performance factor [HSPF].						
6. Water heaters with an energy factor of 0.92 or higher.						
7. All occupied rooms shall have some form of daylighting (e.g., skylights or windows).						
8. At least 50% of artificial lighting unit fixtures shall be high efficacy.						
 Waterless urinals and high efficiency toilets. Water-efficient faucets (1.28 gpm). 						
11. Blower door home energy rating system (HERS) verified envelope leakage or equivalent.						
12. Enhanced insulation (rigid wall insulation R-13 or equivalent, roof/attic R-38).						
13. Cool surface treatments on all drive aisles and parking areas or with a solar-reflective cool pavement such as concrete subject to Airport Land Use Commission (ALUC) approval.						
B. Landscape Design – Prior to issuance of a building permit, MIPAA shall confirm building and landscaping plans include the following:						
1. Electrical outlets to each of the areas in the vicinity of the building that are to be landscaped						
so that electrical equipment shall be used for landscape maintenance. This measure may						
also be satisfied by locating charging stations around the building to accommodate battery-						
operated equipment.						
2. Landscape non-potable water system shall meet "purple" pipe standards.						
3. Water efficient landscaping having no turf and only drought-tolerant plants and including						
additional water-efficient irrigation controls such as smart irrigation controllers.						
C. Tenant Agreement Requirements – Prior to issuance of a certificate of occupancy, MIPAA shall confirm any tenant agreement includes the following:						
1. Require the use of electric or battery-operated equipment for landscape maintenance.						
2. Require the use of 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) 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.						
3. Require provision of the following information annually to employees and truck drivers as						
appropriate:						
a. Building energy efficiency, solid waste reduction, recycling, and water conservation.						
 b. Vehicle greenhouse gas (GHG) emissions, electric vehicle charging availability, and alternate transportation opportunities for commuting. 						
 c. Participation in the Voluntary Interindustry Commerce Solutions (VICS) "Empty Miles" program to improve goods trucking efficiencies. 						
 d. Health effects of diesel particulates, state regulations limiting truck idling time, and the benefits of minimized idling. 						
e. The importance of minimizing traffic, noise, and air pollutant impacts to any residences in						
the Project vicinity.						

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting		Verification of Compliance			
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
f. Efficient scheduling and load management to eliminate unnecessary queuing and idling of						
trucks.	Dries to inquesto of a	Daview and engroved of building plans	MIDAA			
 MM-AQ-4. Truck Requirements. A. Building Design – Prior to issuance of a building permit, March Inland Port Airport Authority (MIPAA) shall confirm the following: The loading docks shall be designed to accommodate SmartWay trucks. 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. Applicant shall provide project specifications, drawings, and calculations that demonstrate that main electrical supply lines and panels have been sized to support 'clean fleet' charging facilities, including heavy trucks and delivery vehicles, 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. B. Anti-Idling Signs – Prior to issuance of a certificate of occupancy, MIPAA shall confirm the following: C. Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable California Air Resources Board (CARB) anti-idling regulations. At a minimum, each sign shall include (1) instructions for truck drivers to shut off engines when not in use; (2) instructions for drivers of diesel trucks to restrict idling to no more than 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 CARB to report violations. Prior to the issuance of an occupancy permit, MIPAA shall conduct a site inspection to ensure that the signs are in place. One 6-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	Prior to issuance of a building permit; prior to issuance of a certificate of occupancy	Review and approval of building plans and any tenant agreements submitted	MIPAA			
MM-AQ-5. Commute Trip Reduction.	Prior to issuance of a	Review and approval of any tenant	MIPAA	+		
Prior to issuance of a certificate of occupancy, March Inland Port Airport Authority shall confirm any enant agreement includes the following:	certificate of occupancy	agreements submitted				
A. Reservation of a total of 5% of vehicle/employee parking spaces for preferential spaces for carpools and van pools.						

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting		Verification of Compliance			
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
 B. Provision of short- and long- term bicycle parking facilities to meet peak season maximum demand (one bike rack space per 20 vehicle/employee parking spaces). C. Provision of "end-of-trip" facilities including showers, lockers, and changing space (four clothes lockers and one shower provided for every 80 employee parking spaces). D. Provision of on-site food vending machines or refrigerator, microwave oven, and mail facilities (i.e., drop box) at the project site. Office space shall include an on-site computer, internet connection, and other services for personal employee use. E. Requirement to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking. 						
им-AQ-6. Additional Air Quality Tenant Requirements.	Prior to issuance of a	Review and approval of any tenant	MIPAA			
Prior to issuance of a certificate of occupancy, MIPAA shall confirm any tenant agreement includes he following:	certificate of occupancy	agreements submitted				
 A. Tenant shall not use diesel back-up generators, unless absolutely necessary. Tenant shall provide documentation demonstrating, to MIPAA'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 (BACT) 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. Tenant shall make every effort to utilize rental emergency backup generators that meet CARB's Tier 4 emission standards or have the least emissions. B. Tenant shall sweep the property monthly, including parking lot and truck court, to remove road dust, tire wear, brake dust, and other contaminants. C. Tenant shall comply with all applicable requirements of the MMRP, a copy of which shall be attached to each agreement. 						
Biological Resources						
Aitigation Measures	•	,	•	1		
MM-BIO-1A. Burrowing Owl Avoidance and Minimization Measures. Prior to the initiation of ground disturbance, a qualified biologist shall conduct pre-construction surveys for burrowing owl to determine presence/absence of the species. The survey shall be conducted in accordance with the most current and applicable California Department of Fish and Wildlife (CDFW) protocol within 30 days of site disturbance. If burrowing owls are not detected during the clearance survey, no additional mitigation is required. Pre-construction surveys shall include suitable burrowing owl habitat within the project footprint and within 500 feet of the project footprint (or within an appropriate buffer as required in the most recent guidelines and where legal access to conduct the survey exists). If burrowing owls are not detected during the clearance survey, no additional mitigation is required.	Prior to initiation of ground disturbance	Conduct, and provide results of pre- construction surveys in a Burrowing Owl Pre-construction Survey Report	MIPAA, CDFW (as applicable)			
If burrowing owl is detected, occupied burrowing owl burrows shall not be disturbed during the breeding season (February 1 through August 31) unless a qualified biologist approved by CDFW verifies through non-invasive methods that either the birds have not begun egg laying and incubation, or that juveniles from the occurred burrows are foraging independently and capable of independent survival. Disturbance buffers shall be implemented by a qualified biologist in accordance with the recommendations within CDFW's 2012 Staff Report on Burrowing Owl						

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting		Verification of Compliance			
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
Mitigation and in coordination with CDFW. A biologist shall be contracted to perform monitoring approximately every other day during all ground disturbance and construction activities. The definitive frequency and duration of monitoring shall be dependent on whether it is the breeding season or the non-breeding season and the efficacy of the exclusion buffers, as determined by a qualified biologist and in coordination with CDFW.						
If burrowing owl is detected during the non-breeding season (September 1 through January 31) or confirmed to not be nesting, a non-disturbance buffer between Proposed Project activities and the occupied burrow shall be installed by a qualified biologist in accordance with the recommendations in CDFW's 2012 Staff Report on Burrowing Owl Mitigation and in coordination with CDFW. The project applicant shall submit at least one burrowing owl pre-construction survey report to the satisfaction of the March Inland Port Airport Authority and CDFW to document compliance with this mitigation measure. For the purposes of this mitigation measure, a "qualified biologist" is a biologist who meets the requirements set forth in the CDFW 2012 Staff Report on Burrowing Owl Mitigation.						
MM-BIO-1B. Burrowing Owl Relocation and Mitigation Plan. If burrowing owls are identified within the project site, a Burrowing Owl Relocation and Mitigation Plan (Plan) shall be prepared and submitted for approval by the California Department of Fish and Wildlife (CDFW). Any passive or active relocation shall only occur outside the burrowing owl breeding season. Once the Plan is approved, any passive or active relocation of non-breeding burrowing owls from the project site shall be implemented by a qualified biologist. The Plan shall detail methods and guidance for passive or active relocation of burrowing owls from the project site, as well as any proposed mitigation (e.g., replacement habitat, creation of artificial burrows, identification of conservation lands, or as otherwise described in the CDFW 2012 Staff Report on Burrowing Owl Mitigation). The Plan will also provide a description of surrounding suitable habitat conditions; describe any monitoring (if passive relocation is implemented); locate a receiver site and assess the conditions for burrowing owl suitability (if active relocation is implemented) followed by burrowing owl relocation activity details, and implement monitoring and management of relocated owls on the receiver site; and describe reporting requirements. Additional compensatory mitigation may also be required by CDFW if occupied burrows or territories occur within the permanent impact footprint. In coordination with CDFW, any additional compensation may include off-site enhancement or expansion of burrows for breeding, shelter and dispersal opportunity, and removal or control of population stressors. Off-site mitigation may also require long-term protection through a conservation easement or other protective measure. Compensatory mitigation shall also be detailed in the Burrowing Owl Relocation and Mitigation Plan.	Prior to initiation of ground disturbance	Review and approval of a Burrowing Owl Relocation and Mitigation Plan if required	MIPAA, CDFW (as applicable)			
 MM-BIO-2. Best Management Practices. To avoid impacts to special-status resources and inadvertent disturbance to areas outside the project construction limits, the following monitoring requirements and best management practices (BMPs) shall be implemented: A biologist shall be contracted to perform daily monitoring during initial vegetation removal and throughout ground-disturbing activities that result in the breaking of the ground surface. After initial vegetation removal and ground disturbance that results in breaking of the ground surface, a biologist shall be contracted to perform regular random checks (not less than once per week but the frequency could be increased depending on the presence of special-status species) to ensure that all mitigation measures and BMPs are implemented. In addition, monitoring reports and a post-construction monitoring report shall be prepared to document compliance with these mitigation measures and BMPs and submitted to the March Inland Port Airport Authority (MIPAA). 	Prior to start of construction activities and during construction activities	Presence of a qualified biologist; Presence of work limit delineation; Daily monitoring and random checks; Review monitoring reports and post-construction monitoring reports; Review of landscape plans	MIPAA			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting		Verification of Compliance			
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
 To prevent inadvertent disturbance to areas outside the limits of work, the construction limits shall be clearly demarcated (e.g., installation of flagging or temporary visibility construction fence) prior to ground-disturbing activities, and all construction activities, including equipment staging and maintenance, shall be conducted within the marked disturbance limits. The work limit delineation shall be maintained throughout project construction. Should construction fencing be installed to delineate the limits of work, adequate openings along the northern and western perimeters shall be established to allow for dispersal of wildlife into the adjacent undeveloped lands. The contractor shall consult with the biological monitor to confirm that construction fencing will prevent unauthorized access beyond the limits of work while allowing wildlife to escape from active construction areas. A biologist shall flush special-status species (i.e., avian or other mobile species) from suitable habitat areas immediately prior to initial vegetation removal activities. Construction vehicles shall not exceed 15 mph on unpaved roads adjacent to the project site or the right-of-way accessing the site. If trash and debris need to be stored overnight during construction activities, fully covered trash receptacles that are animal proof and weather proof shall be used by the contractor to contain all food, food scraps, food wrappers, beverage containers, and other miscellaneous trash. Alternatively, standard trash receptacles may be used during the day, but must be removed each night. Temporary structures and storage of construction materials shall not be located in jurisdictional waters, including wetland or riparian areas. Staging/storage areas for construction equipment and materials shall not be located in jurisdictional waters, including wetland or riparian areas. The operator shall not permit pets on or adjacent to construction sites.<						
MM-BIO-3. San Diego Black-Tailed Jackrabbit Avoidance and Minimization Measures. Thirty days prior to ground-disturbing activities, a qualified biologist shall conduct a survey within the proposed disturbance zone and within 200 feet of the disturbance zone for San Diego black-tailed jackrabbit. If San Diego black-tailed jackrabbits are present, non-breeding rabbits shall be flushed from areas to be disturbed. Dens, depressions, nests, or burrows occupied by pups shall be flagged and ground-disturbing activities shall be avoided within a minimum of 200 feet during the puprearing season (February 15 through July 1). This buffer may be reduced based on the location of	30 days prior to start of ground-disturbing activities and during ground-disturbing activities	Review of preconstruction survey; daily monitoring; review of written report if applicable	MIPAA, CDFW (as applicable)			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verification of Compliance			
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments	
the den upon consultation with the California Department of Fish and Wildlife (CDFW). Occupied maternity dens, depressions, nests, and burrows shall be flagged for avoidance. A biologist shall be contracted to perform daily monitoring during initial vegetation removal and throughout ground-disturbing activities that result in the breaking of the ground surface, as further described in MM BIO-2. If construction fencing is installed, the contractor shall establish adequate openings within the northern and western fence perimeters to allow for passive dispersal into adjacent undeveloped lands during construction. Fence openings will not include openings that direct wildlife to existing aircraft operations. If unattended young are discovered, they shall be relocated to suitable habitat by a qualified biologist. The biologist shall document all San Diego black-tailed jackrabbits identified, avoided, and/or moved, and provide a written report to CDFW within 72 hours. Collection and relocation of animals shall only occur with the proper scientific collection and handling permits, and only in consultation with CDFW.							
MM-BIO-4. Nesting Bird Avoidance and Minimization Measures. To avoid direct impacts to raptors and/or native/migratory birds (including California horned lark), vegetation removal and grading activities should occur outside the breeding season (February 1 through September 15) for these species. If removal of habitat in the proposed area of disturbance must occur during the breeding season (September 16 through January 31), a qualified biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within 3 calendar days prior to the start of ground disturbance (including removal of vegetation).	Prior to and during construction	Review of pre-construction surveys; monitoring throughout construction	MIPAA				
If an active nest is found, a qualified avian biologist shall alert the Operations Manager or Wildlife Hazard Manager at March Air Reserve Base to the presence of the nest to determine whether the nest poses risks to aircraft operations. The biologist shall establish an exclusion buffer, with the established buffer width being dependent on preventing all disruption of nesting behavior and nest activity. All active nests shall be monitored throughout construction, at a frequency determined by a qualified biologist, until ground disturbance and construction activities are concluded or the nest is no longer active, whichever occurs first. The biological monitor shall exercise caution to minimize disturbance to the nest. Photographs and other documentation shall be conducted away from the nest to prevent disturbance. Geographic information system (GIS) points shall be taken at/near the active nest only to the extent that the nest will not be disturbed, and nesting behavior will not be disrupted.							
MM-BIO-5. Jurisdictional Waters Permitting and Regulatory Agency Permitting. The project site supports aquatic resources that are considered jurisdictional under the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW). Prior to ground disturbance, the project applicant shall coordinate with the USACE, Los Angeles District, to assure conformance with the requirements of Section 404 of the Clean Water Act and with the Santa Ana RWQCB (Region 8) to ensure conformance with the requirements of Section 404/401 of the Clean Water Act and the Porter-Cologne Water Quality Control Act. Prior to activity within CDFW-jurisdictional streambed or associated riparian or wetland habitat, the project applicant shall coordinate with CDFW (Eastern Sierra and Inland Desert Region 6) relative to conformance to the Lake and Streambed Alteration permit requirements.	Prior to ground disturbance	Documentation of mitigation or purchase of credits at an approved mitigation bank; Review and approval of a HMMP if applicant-sponsored mitigation is implemented	MIPAA, USACE, RWQCB, CDFW, and State Water Resources Control Board (as applicable)				
The Proposed Project shall mitigate at not less than 1:1 with reestablishment credits (0.45 acres USACE/0.45 acres RWQCB/0.49 acres CDFW) for impacts to aquatic resources as part of an overall strategy to ensure no net loss. Mitigation shall be completed through use of a mitigation bank or other applicant-sponsored mitigation. Final mitigation ratios and credits shall be determined							

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting	Monitoring/Reporting			n of Complia	ance
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
through consultation with USACE, RWQCB, and/or CDFW based on agency evaluation of current resource functions and values and through each aquatic resource agency's respective permitting process.						
Should applicant-sponsored mitigation be implemented, a Habitat Mitigation and Monitoring Plan shall be prepared in accordance with State Water Resources Control Board guidelines and approved by the agencies in accordance with the proposed program permits. The Habitat Mitigation and Monitoring Plan shall include a conceptual planting plan, including planting zones, grading, and irrigation, as applicable; a conceptual plant palette; weeding practices; a long-term maintenance and monitoring plan; annual reporting requirements; and proposed success criteria. Any off-site applicant-sponsored mitigation shall be conserved and managed in perpetuity. Any off-site applicant-sponsored mitigation shall be located a minimum of 10,000 feet away from the project site in order to avoid creating new wildlife attractants near the airfield.						
Best management practices shall be implemented to avoid any indirect impacts to jurisdictional vaters, as follows:						
 Vehicles and equipment shall not be operated in ponded or flowing water except as described in permits. Water containing mud, silt, or other pollutants from grading or other activities shall not be allowed to enter jurisdictional waters or be placed in locations that may be subjected to high storm flows. Spoil sites shall not be located within 30 feet from the boundaries of jurisdictional waters or in locations that may be subject to high storm flows where spoils might be washed back into drainages. Raw cement/concrete or washings thereof, asphalt, paint or other coating material, oil or other petroleum products, or any other substances that could be hazardous to vegetation or wildlife resources resulting from Proposed Project-related activities shall be prevented from contaminating the soil and/or entering avoided jurisdictional waters. No equipment maintenance shall be performed within 100 feet of jurisdictional waters, including wetlands and riparian areas, where petroleum products or other pollutants from the 						
equipment may enter these areas. Fueling of equipment shall not occur on the project site. Cultural Resources						
Mitigation Measures						
MM-CUL-1. Archaeological Monitoring. Prior to the commencement of ground-disturbing activities, the project applicant shall retain a qualified Archaeological Principal Investigator (Principal Investigator), meeting the Secretary of the Interior's Professional Qualification Standards, to oversee monitoring of all mass grading and trenching activities. The Project Archaeologist shall manage and oversee monitoring for all initial ground-disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition, etc. The Project Archaeologist shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with the Consulting Tribe(s) and MIPAA.	Prior to issuance of a grading permit	Review and approval of a CRMTP; submission of a Monitoring Report	MIPAA,			
MM-CUL-2. CRMTP. Prior to the start of ground-disturbing activities, the Project's qualified archaeological Principal Investigator (Principal Investigator), meeting the Secretary of the Interior's Professional Qualification Standards, in consultation with the Consulting Tribe(s), March ARB, MIPAA, and the construction manager, shall develop a Cultural Resource Monitoring and Treatment	Prior to the issuing grading permit	Agreement with Cahuilla Band of Indians and the Soboba Band of Luiseño Indians for tribal monitoring;	MIPAA, Cahuilla Band of Indians and the Soboba Band of Luiseño Indians (as applicable)			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verification of Compliance		
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
Plan (CRMTP). The CRMTP shall define the process to be followed upon discovery of cultural resources to ensure the proper treatment, evaluation, and management of cultural resources within the project site, should they be encountered during construction.		review and approval of a CRMTP; submission of a Monitoring Report				
 A. For purposes of CRMTP implementation, the project area subject to monitoring is defined as follows: 1. All areas within the project site boundary specifically in which ground-disturbing activities (e.g., including, but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition) will occur are subject to monitoring. 2. Any on-site or off-site ancillary Proposed Project use areas or facility locations are subject to the protocols outlined in the CRMTP. These include, but are not limited to, access roadways, yards/support areas, easements, staging areas, and utility tie-ins. B. The following shall be included in the CRMTP: 1. Project description and location 2. Project grading and development scheduling 3. Roles and responsibilities of individuals on the Project 4. The pre-grading meeting and Cultural Resources Worker Sensitivity Training (MM-CUL-3) details 5. The protocols and stipulations that the contractor, MIPAA, Consulting Tribe(s) and Project Archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation (MM-CUL-4, MM-TCR-2) 6. The type of recordation needed for inadvertent finds and the stipulations of recordation of sacred items 7. Contact information of relevant individuals for the Proposed Project. 						
MM-CUL-3. Cultural Resources Worker Sensitivity Training. The CRMTP shall include a requirement or all construction personnel to complete a Cultural Resources Worker Sensitivity Training program Training) prior to commencement of construction activities. The Training shall be conducted by a qualified archaeologist (Project Archaeologist) and representatives of the Consulting Tribe(s). The training shall provide (1) the types and characteristics of cultural materials that may be identified during construction and an explanation of the importance of and legal basis for the protection of significant cultural resources; (2) proper procedures to follow in the event that cultural resources or numan remains are uncovered during ground-disturbing activities, including procedures for work curtailment or redirection; and (3) protocols for contacting the site supervisor and archaeological and tribal monitor upon discovery of a cultural resources or human remains. All new construction personnel must take the Training prior to beginning ground-disturbing activities.	Prior to excavation and grading activities	Agreement with Cahuilla Band of Indians and the Soboba Band of Luiseño Indians	MIPAA, Cahuilla Band of Indians and the Soboba Band of Luiseño Indians (if applicable)			
MM-CUL-4. Inadvertent Discovery of Archaeological Resources. In the event that cultural resources are inadvertently unearthed during excavation and grading activities for the Proposed Project, all earth-disturbing activities within a 100-foot radius of the area of the discovery shall cease and the Project Archaeologist shall notify March Air Reserve Base (ARB), March Inland Port Airport Authority MIPAA), and the Consulting Tribe(s). The Project Archaeologist, in consultation with the Tribes, will evaluate the significance of the find and determine the appropriate course of action. Authorization to resume construction shall be given by March ARB and MIPAA only after an action plan has been agreed to and it has been fulfilled. The action plan shall include implementation of all appropriate measures to protect any possible archaeological resources. Treatment of tribal cultural resources	During excavation and grading activities	Consultation with the NAHC, MLD, and Cahuilla Band of Indians, Soboba Band of Luiseño Indians	MIPAA, Cahuilla Band of Indians and the Soboba Band of Luiseño Indians (if applicable)			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verificati <u>o</u> r	n of Complia	ince
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
inadvertently discovered during the project's ground-disturbing activities shall be subject to the consultation process required by state law and AB 52.						
 A. All ground-disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Project Applicant, the Project Archaeologist, the Tribal Representative(s), and MIPAA to discuss the significance of the find. B. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Tribal Representative(s) and the Project Archaeologist, a decision shall be made, with the concurrence of MIPAA, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the cultural resources. C. Further ground disturbance, including but not limited to grading, trenching, etc., shall not resume within the area of the discovery until an agreement has been reached by all parties as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by additional tribal monitors if needed. D. Treatment and avoidance of the newly discovered resources shall be consistent with the Cultural Resources Management Plan and Monitoring Agreements entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property, so they are not subject to further disturbance in perpetuity as identified in MM-TCR-4 (Non-Disclosure). E. If the find is determined to be significant and avoidance of the site has not been achieved, a Phase III data recovery plan shall be prepared by the Project Archaeologist, in consultation with the Tribe, and shall be submitted to MIPAA for review and approval prior to implementation of said plan. F. Pursuant to California Public Resources Code Section 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the project applicant and the Tribe(s) cannot agree on the significance or the mitigation f						
found, shall be provided to MIPAA upon the completion of a treatment plan and final report detailing the significance and treatment finding. MM-CUL-5. Phase IV Report. Prior to final inspection, the Project Archaeologist shall submit two	Prior to final inspection	Review and approval of a Phase IV	MIPAA			
copies of the Phase IV Cultural Resources Monitoring Report that complies with MIPAA's requirements for such reports. The Phase IV report shall include evidence of the required cultural/historical sensitivity training for the construction staff held during the pre-grade meeting. MIPAA shall review the reports to determine adequate mitigation compliance. Provided the reports are adequate, the MIPAA Director shall clear this condition. Once the report(s) are determined to be adequate, two copies shall be submitted to the South Coastal Information Center at San Diego State University and one copy shall be submitted to the Pechanga Cultural Resources Department.		Report	IVIIFAA			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verificatio	n of Complia	ance
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
Geology and Soils						
Mitigation Measures						
MM-GEO-1. Paleontological Monitoring Program. Prior to the issuance of a grading permit, the project applicant shall, to the satisfaction of the March Inland Port Airport Authority, submit a paleontological monitoring program drafted by a qualified paleontologist (Paleontologist) in accordance with Society of Vertebrate Paleontology's 2010 Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources, along with evidence that a paleontological monitor has been retained to monitor mass grading and construction activities and has the authority to temporarily halt or divert construction equipment to allow for removal of abundant or large specimens. As part of the paleontological monitoring program, the project applicant shall implement the following actions:	Prior to issuance of a grading permit	Review and approval of a paleontological monitoring program; Review and approval of a report and inventory of findings	MIPAA			
 A paleontological monitor shall be on site during all excavations below the depth of previously disturbed sediments. Specifically, all earthmoving operations above the depth of 3 feet below ground surface (bgs) shall be monitored periodically to identify the sediments being impacted, and any earthmoving operations reaching beyond the depth of 3 feet bgs shall require continuous monitoring for potential paleontological remains. In the event that paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activities to allow evaluation and potential recovery of paleontological resources by the Paleontologist. The area of discovery plus a 50-foot-radius buffer shall be roped off. Once documentation and collection of the find is completed, the monitor shall remove the rope and allow grading to recommence in the area of the find. Recovered specimens shall be identified to the lowest taxonomic level and curated at a repository with permanent retrievable storage that allows for further research in the future, such as the Western Science Center. If, during the paleontological monitoring program, half the Proposed Project excavations have occurred with no fossil recovery, monitoring can be reduced or terminated, as determined by the Paleontologist. A report of findings, including an itemized inventory of recovered specimens and a discussion of their significance when appropriate, shall be prepared upon completion of the research procedures outlined above. The report shall summarize the monitoring program and include geological observations and any paleontological resources recovered during paleontological monitoring for the Proposed Project. Approval of the report and the inventory by the March Inland Port Airport Authority shall signify completion of the mitigation program. 						
Greenhouse Gas Emissions						
Mitigation Measures						
MM-GHG-1. Installation of EV Charging Stations. Prior to issuance of a building permit, March Inland Port Airport Authority shall ensure that the Proposed Project plans include the circuitry, capacity, and equipment for electric vehicle (EV) charging stations in accordance with Tier 2 of the 2022 CALGreen Code.	Prior to issuance of a building permit	Review of plans and specifications	MIPAA			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verification of Compliance		
	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
lazards and Hazardous Materials						
ditigation Measures						
	Prior to issuance of a	Review and approval of a HMCP	MIPAA, U.S. EPA,			
5 ,	grading permit		California Department of Toxic Substances Control, Santa Ana Regional Water Quality Control Board			
construction activities shall not disturb existing treatment system (soil vapor extraction [SVE] system) wells or monitoring wells. Although construction activities are not anticipated to encounter roundwater, should groundwater be encountered during excavation and/or construction activities, work activities directly associated with/impacted by the discovery of groundwater shall cease. The project applicant or their designee shall contact the Santa Ana Regional Water Quality Control coard, the March Inland Port Airport Authority, and the March Air Reserve Base environmental group, all of which oversee the cleanup of CG049/0U5, to determine appropriate procedures to dither manage contaminated groundwater or alter construction plans to avoid further contact with contaminated groundwater. Either construction plans shall be altered to avoid groundwater depths, or dewatering activities shall be designed to remove groundwater from excavations as needed to complete proposed activities, characterize the groundwater, and either utilize on-site treatment systems to treat and discharge groundwater, with approval of the treatment system operator and verseeing regulatory agency, or otherwise manage the groundwater as approved by the overseeing egulatory agency. The agreed-upon plan shall be prepared and implemented prior to ecommencement of construction activities.	During excavation and/or construction activities	Review of plans and specifications; Review and approval of construction plan alterations if necessary to avoid groundwater or otherwise manage the groundwater as approved by the Santa Ana Regional Water Quality Control Board	MIPAA; March Air Reserve Base environmental group; Santa Ana Regional Water Quality Control Board			
	Prior to issuance of a grading permit	Review of plans and specifications	MIPAA			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verification of Compliance		
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
Hydrology and Water Quality						
Mitigation Measures						
MM-HYD-1. Water Quality BMPs.	Prior to issuance of a	Review of plans and specifications	MIPAA			
Project design shall include installing drainage sumps that separate sediment, using grease removal/trap systems, and ensuring that ground support and maintenance equipment washing areas are plumbed to the sanitary sewer (instead of the stormwater system).	grading permit					
Land Use and Planning						
Mitigation Measures						
MM-LU-1. Occupancy Limits.	Prior to issuance of a	Documentation of meeting the human	MIPAA			
Prior to the issuance of a certificate of occupancy, the project applicant shall demonstrate, via an Airport Land Use Commission Condition of Approval, to the March Inland Port Airport Authority's satisfaction that the levels of human occupancy would not exceed the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan's maximum permissible average of 100 persons per acre or 250 persons per single acre.	certificate of occupancy	occupancy Airport Land Use Commission Condition of Approval to MIPAA				
Noise						
Mitigation Measures						
MM-NOI-1. Construction Worker Hearing Protection.	Prior to issuance of any	Review of plans and specifications	MIPAA			
Prior to issuance of any grading permit and building permit, the applicant shall provide evidence that the subject plans contain the following requirements and restrictions:	grading and building permits					
 Contractors shall provide personal protective equipment to all employees in compliance with 8 CCR, Section 5096 [Exposure Limits for Noise]. 						
 Contractors shall provide all employees with a copy of "Protecting Yourself from Noise in Construction – Pocket Guide" OSHA Publication 3498 (2011), or similar educational materials. 						
MM-NOI-2. Future Tenant Aircraft Fleet.	Prior to issuance of a	Review of submitted documentation relating to noise impacts	MIPAA			
Prior to issuance of a certificate of occupancy, the applicant shall provide documentation to March Inland Port Airport Authority confirming that expected noise emissions from the tenant's aircraft fleet mix do not exceed the noise impacts identified and disclosed in this Environmental Impact Report. Such documentation shall confirm the residential areas that would experience a significant noise increase due to aircraft operations is equal to or less than that disclosed under Threshold NOI-3. Absent such documentation, additional environmental review shall be required.	certificate of occupancy					
Transportation						
Project Design Features						
PDF-TRA-1. Payment of Fair-Share Cost.	Prior to issuance of a certificate of occupancy	Distribution of mitigation contribution to member entities in accordance with Appendix M-1, Table 1-5	MIPAA			
A. To address operational deficiencies at off-site intersections, prior to the issuance of a certificate of occupancy, the Proposed Project shall contribute \$281,498 (with Heacock Street Extension as its fair share toward the improvement measures provided in Table 1-5, Summary of Improvements and Rough Order of Magnitude Costs – with Heacock Street Extension, of the Traffic Analysis (Appendix M-1 to this EIR).						

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verification of Compliance		
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
 B. The applicant shall pay a fair-share contribution to the City of Moreno Valley for the pavement maintenance over a 30-year cycle of the following roadway segments: Heacock Street from the access roadway to Cactus Avenue. Heacock Street from the access roadway to San Michele Road. Cactus Avenue from Heacock Street to the western City limits. Indian Street from San Michele Road to the southern City limits. Perris Boulevard from San Michele Road to the southern City limits. The applicant agrees to pay an aggregate amount for pavement maintenance described in subsection B up to a maximum of \$324,173.00, which shall be payable in annual installments equal to \$10,805.76. 						
Mitigation Measures				_		_
MM-TRA-1. Construction Traffic Management Plan. Prior to the issuance of building permits, the applicant shall develop and implement a March Inland Port Airport Authority-approved Construction Traffic Management Plan (CTMP) 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; and shall include, but not be limited to, the following measures:	Prior to issuance of building permits	Review and approval of a CTMP	MIPAA			
 Maintain existing access for land uses in proximity of the project site throughout construction. Designate an on-site employee parking area. Schedule deliveries and pickups of construction materials during non-peak travel periods. Minimize obstruction of through traffic lanes on Heacock Street. Ensure that construction equipment traffic from the contractors is controlled by flagman. Identify designated transport routes for heavy trucks to be used throughout Project construction. Schedule vehicle movements to ensure that there are no vehicles waiting off site and impeding public traffic flow on the surrounding streets. 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 to ensure the safety of the pedestrian and access to adjacent businesses and/or properties. Ensure that any travel lane encumbrances do not occur during peak traffic hours. Coordinate with adjacent or affected businesses and/or properties and emergency service providers to ensure that adequate access exists to the project site and neighboring sites. Route construction traffic to avoid travel through, or proximate to, sensitive land uses. Provide all construction contractors with written information on the CTMP, along with clear consequences to violators for failure to follow the CTMP. Post signage on Heacock Street with contact information for the project manager for public questions or concerns about construction traffic. Ensure that a response to comments or inquiries is provided within 72 hours of receipt. 	Duint to incurance of a		MIDAA			
MM-TRA-2. Project Truck Route on Heacock Street. The project applicant shall ensure that all leasing agreements for the Proposed Project require that all Proposed Project truck traffic utilize the Harley Knox Boulevard interchange at I-215 and the designated truck routes to the south of the project site. The intersection improvements at Heacock Street shall include installed signage directing trucks to the Harley Knox Boulevard interchange.	Prior to issuance of a certificate of occupancy	Review and approval of leasing agreements	MIPAA			

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verification of Compliance		
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments
Prior to issuance of a certificate of occupancy, a traffic management plan shall be submitted to MIPAA and the City of Moreno Valley to manage and identify potential hazards associated with the Proposed Project within the City of Moreno Valley. Initial drive counts (to include vehicle classification) shall be provided to the City of Moreno Valley within one (1) year of occupancy and thereafter every three (3) years for up to ten (10) years from occupancy.						
Tribal Cultural Resources						
Mitigation Measures						
MM-TCR-1. Tribal Monitoring. Prior to issuance of a grading permit, the project applicant shall retain a qualified Tribal monitor to monitor all initial ground-disturbing activities, including, but not limited to, clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, and structure demolition. The applicant shall secure an agreement with the Tribe (or Tribes) for Tribal monitoring. The applicant shall submit a copy of a signed contract between the Tribe (or Tribes) and the landowner/applicant for the monitoring of the Proposed Project to March Air Reserve Base (ARB) and the March Inland Port Airport Authority (MIPAA) Director. The applicant shall provide a minimum of 30 days' advance notice to the Tribe (or Tribes) of all mass grading and trenching activities. The Tribal monitor(s) shall oversee monitoring for all initial ground-disturbing activities and excavation of each portion of the project site, including clearing, grubbing, tree removals, mass or rough grading, trenching, stockpiling of materials, rock crushing, structure demolition, etc. The Tribal monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground-disturbing activities to allow identification, evaluation, and potential recovery of cultural resources in coordination with the Project Archaeologist and MIPAA.	Prior to issuance of a grading permit	Presence of qualified Tribal monitor; signed contract between the tribe (or Tribes) and the landowner/applicant; minimum 30 days advance notice to the Tribe (or Tribes) of all mass grading and trenching	MIPAA, Pechanga and Soboba Tribe			
MM-TCR-2. Final Disposition. In the event that Native American cultural resources are discovered during the course of grading (inadvertent discoveries), the following procedures shall be carried out for final disposition of the discoveries:	During ground- disturbing activities	Consultation with Pechanga and Soboba Tribes as applicable; Review and approval of Phase IV report if	MIPAA, Pechanga and Soboba Tribes (as applicable)			
 A. One or more of the following treatments, in order of preference, shall be employed with the Tribes. Evidence of such shall be provided to MIPAA: 1. Preservation in place of the cultural resources, if feasible. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources. 2. Reburial of the resources on the Project property. The measures for reburial shall include, at least, the following: Measures and provisions to protect the future reburial area from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods, and Native American human remains are excluded. Any reburial process shall be culturally appropriate. Listing of contents and location of the reburial shall be included in the confidential Phase IV report. The Phase IV Report shall be filed with MIPAA under a confidential cover and not subject to Public Records Request. 3. If preservation in place or reburial is not feasible then the resources shall be curated in a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources, ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be provided by the landowner to MIPAA. There shall be no destructive or invasive testing on sacred items, burial goods, or 		required				

Table IV-1. Mitigation Monitoring and Reporting Program for Meridian D-1 Gateway Aviation Center Project

	Monitoring/Reporting			Verification of Compliance			
Project Design Feature/Mitigation Measure	Monitoring/Reporting Phase	Monitoring/Reporting Method	Enforcing Agency and Responsible Agency	Initial	Date	Comments	
Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Phase IV monitoring report. Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to MIPAA upon the completion of a treatment plan and final report detailing the significance and treatment finding.							
MM-TCR-3. Discovery of Human Remains. In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the project contractor shall immediately halt work and contact the Riverside County Coroner to evaluate the discovery. The contractor shall also notify March Air Reserve Base (ARB) and March Inland Port Airport Authority (MIPAA). No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the County Coroner has determined, within 2 working days of notification of the discovery, the appropriate treatment and disposition of the human remains. If the County Coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, NAHC shall immediately notify those persons it believes to be the most likely descendants (MLDs) of the deceased Native American. The MLDs shall complete their inspection within 48 hours of being granted access to the site. The MLDs shall then determine, in consultation with the property owner or their representative, the disposition of the human remains. Authorization to resume construction shall be given by March ARB and MIPAA only after consultation with the MLDs and shall include implementation of all appropriate measures to protect any possible burial sites and/or human remains.	During ground disturbing activities	Consultation with the County Coroner, March ARB, MIPAA, NAHC, and MLD as applicable in the unanticipated discovery of human remains	MIPAA				
MM-TCR-4 Non-Disclosure. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. The Coroner, pursuant to the specific exemption set forth in California Government Code 7927.000, parties, and lead agencies will be asked to withhold public disclosure information related to such reburial, pursuant to the specific exemption set forth in California Government Code 7927.000.	During ground- disturbing activities	Consultation with the County Coroner, NAHC, and MLD as applicable	MIPAA				