

APPENDIX A
Agency Correspondence



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Plymouth, MI 48170
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California Department of Fish and Wildlife
Wildlife Branch – Nongame Wildlife
1812 9th Street
Sacramento, California 95811

January 13, 2017

SUBJECT: Intergovernmental and Interagency Coordination of Environmental Planning (NEPA Scoping Letter) for the: Department of Veterans Affairs (VA) Proposed Riverside National Cemetery Expansion 16700 Village West Drive Riverside County, California

To Whom It May Concern:

The US Department of Veterans Affairs (VA) is preparing environmental documentation to assist in the Federal decision-making process concerning the proposed acquisition of approximately 314 acres of land (Site) located at 16700 Village West Drive in an unincorporated area of Riverside County, California for the future expansion of the existing Riverside National Cemetery (RNC), located at 22495 Van Buren Boulevard, in Riverside County, California. The approximately 314-acre Site is contiguous to southwest of the RNC and is associated with General Old Golf Course, an 18-hole golf course opened in 1955 as a private military golf course associated with the March Air Reserve Base. The Site was transferred to the March Joint Powers Authority (JPA) and has been a public golf course since 1996. The land includes a clubhouse, restaurant, associated parking, and a water storage/treatment pond in the northwestern portion and four maintenance buildings in the central portion. The remaining portions are occupied by a landscaped golf course and scattered trees and ponds. The location of the Site is shown in **Attachments 1a – 1c.**

The RNC is currently one of the busiest National Cemeteries in the United States and although VA estimates adequate space remains for burials for the next 20 to 30 years, additional land would be needed in the future. The Site is currently available and has been offered to VA by March JPA. VA would acquire the land, remove all improvements in the near future, and maintain the land as unimproved until such date when the expansion of the RNC becomes necessary. Construction details of the proposed RNC expansion are unknown at this time.

VA is conducting an Environmental Assessment (EA) to evaluate the environmental, cultural, and socioeconomic issues associated with the proposed acquisition, development, and operation of the Site as an expanded RNC pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 *et seq.*); the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508); and VA's Implementing Regulations (38 CFR Part 26, *Environmental Analysis of VA Actions*).

Information Request: *Information your agency can provide on any of the following environmental issue areas (at or in the vicinity of the proposed Site) would be appreciated:*

- Potential environmental concerns or issues;
- Surface and groundwater resources, including streams, wetlands, floodplains, open water features, wells, and local aquifers;

- Federally or state listed threatened or endangered species, or any species proposed for such listing, or critical habitat for such species that may occur within a one-mile radius around the proposed Site;
- Parks, nature preserves, conservation areas, designated wild or scenic rivers, migratory bird habitats, or special wildlife issues;
- Natural resource issues;
- Soils and geologic data, including lists of hydric soils;
- Prime and unique farmland (*National Resources Conservation Services only*);
- Traffic, noise, or socioeconomic concerns;
- Air quality concerns; and
- Additional environmental, cultural, land use, or socioeconomic information or concerns your agency may have with regard to the referenced Site.

Data that you make available will provide valuable and necessary input into the NEPA analytical process, and will serve to scope that analysis. As part of the NEPA process, local citizens, groups, and agencies, among others, will have opportunity to review and comment on the information and alternatives addressed in the document.

Other Agencies and Organizations: A listing of agencies and organizations to which this request was sent is provided in **Attachment 2**. VA will conduct separate consultation regarding the proposed RNC expansion with the California State Historic Preservation Office (SHPO). *Should you know of any additional agencies or organizations that may have data or concerns relevant to this project or Site, please forward them a copy of this letter, include their information in your response, or contact us directly with this information.*

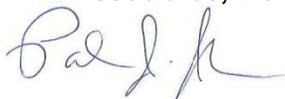
We look forward to and welcome your participation in this process. **Please respond on or before February 10, 2017** to enable us to complete this phase of the project within the scheduled timeframe. TTL Associates, Inc. is assisting the VA in conducting this NEPA process.

Please send your written responses via regular or e-mail (preferred) to:

TTL Associates, Inc.
44265 Plymouth Oaks Boulevard
Plymouth, Michigan 48170
ATTN: Paul J. Jackson, Environmental Scientist
pjackson@tlassoc.com

If you have any questions concerning this request, please direct them to Mr. Jackson at (734) 582-4960.

Sincerely,
TTL Associates, Inc.



Paul J. Jackson
Environmental Scientist

Attachment 1a – 1c: Location Maps
Attachment 2: List of Agencies and Organizations Contacted

**ATTACHMENTS 1A, 1B, AND 1C
LOCATION MAPS**

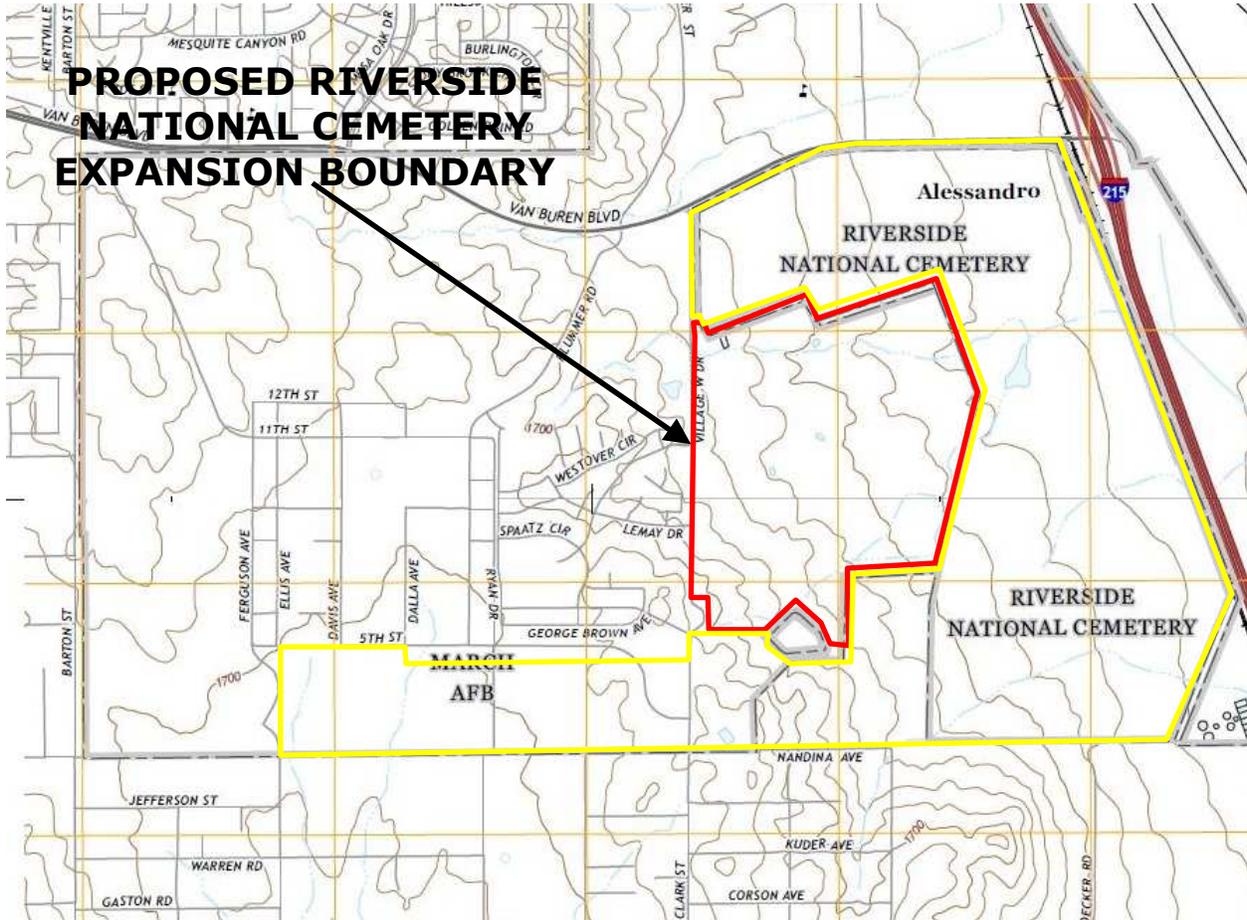
ATTACHMENT 1a

Location Map Proposed Riverside National Cemetery Expansion 16700 Village West Drive Riverside County, California



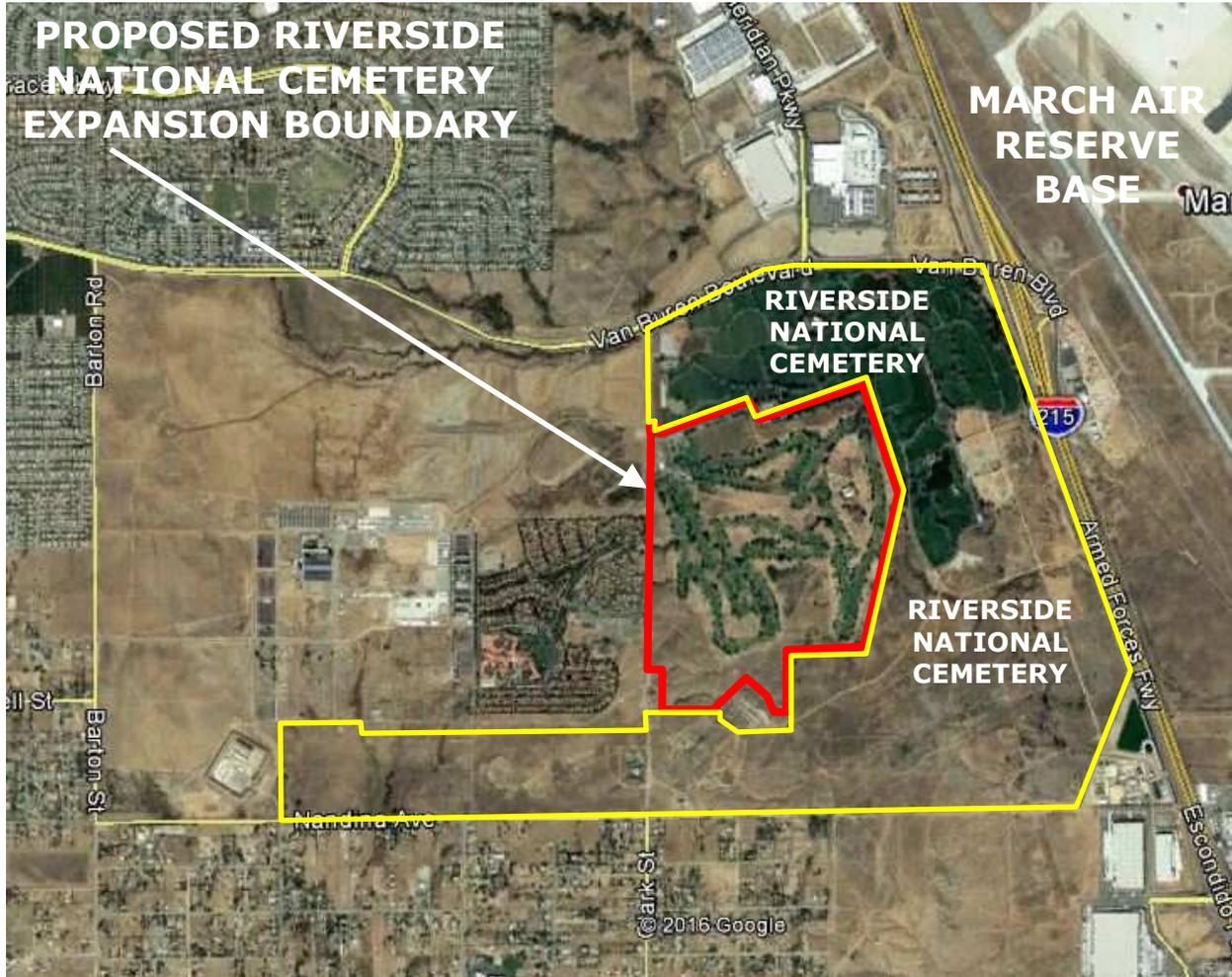
ATTACHMENT 1b

Topographic Location Map Proposed Riverside National Cemetery Expansion 16700 Village West Drive Riverside County, California



ATTACHMENT 1c

Aerial Location Map
Proposed Riverside National Cemetery Expansion
16700 Village West Drive
Riverside County, California



Attachment 2
List of Agencies and Organizations Contacted
Department of Veterans Affairs
Proposed Riverside National Cemetery Expansion
16700 Village West Drive
Riverside County, California

US Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2177 Salk Avenue, Suite 250
Carlsbad, California 92008-7385
Phone: (760) 431-9440

US Environmental Protection Agency, Region 9
Office of Public Affairs
75 Hawthorne Street
San Francisco, California 94105
Phone: (415) 947-8000

US Army Corps of Engineers – Los Angeles District
915 Wilshire Boulevard
Los Angeles, California 90017
Phone: (213) 452-3333

California Environmental Protection Agency
Air Resources Board
P.O. Box 2815
Sacramento, California 95814
Phone: (800) 242-4450

California Environmental Protection Agency
Water Resources Control Board
P.O. Box 100
Sacramento, California 95812-0100
Phone: (916) 341-5057

California Environmental Protection Agency
Office of Environmental Health Hazard
Assessment
P.O. Box 4010
Sacramento, California 95812-4010
Phone: (916) 324-7572

California Environmental Protection Agency
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95814-2828
Phone: (800) 728-6942

California Department of Transportation
District 8
464 West 4th Street
San Bernardino, California 92401
Phone: (909) 383-4631

California Department of Fish and Wildlife
Wildlife Branch – Nongame Wildlife
1812 9th Street
Sacramento, California 95811
Phone: (916) 445-0411

Natural Resources Conservation Service
Indio Service Center
81-077 Indio Boulevard
Indio, California 92201
Phone: (760) 347-3675, Ext. 4

South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765
Phone: (909) 396-2000

Riverside – Corona Resource Conservation
District
4500 Glenwood Drive, Building A
Riverside, California 92501
Phone: (951) 683-7691

Riverside County Flood Control and Water
Conservation District
1995 Market Street
Riverside, California 92501
Phone: (951) 955-1200

Riverside County Building and Safety Department
Administrative Office
4080 Lemon Street, 9th Floor
P.O. Box 1440
Riverside, California 92502
Phone: (951) 955-2025

Riverside County Code Enforcement Department
Administrative Office
4080 Lemon Street, 12th Floor
P.O. Box 1469
Riverside, California 92501
Phone: (951) 955-2004

Riverside County Department of Environmental
Health - Downtown Riverside
3880 Lemon Street, Suite 200
Riverside, California 92501
Phone: (951) 955-8980

Riverside County Environmental Programs
Department
Administrative Office
4080 Lemon Street, 12th Floor
Riverside, California 92501
Phone: (951) 955-6097

Attachment 2 (continued)
List of Agencies and Organizations Contacted
Department of Veterans Affairs
Proposed Riverside National Cemetery Expansion
16700 Village West Drive
Riverside County, California

Riverside County Parks

4600 Crestmore Road
Jurupa Valley, California 92509
Phone: (951) 955-4310

Riverside County Planning Department

4080 Lemon Street
Riverside, California 92502
Phone: (951) 955-3200

Riverside County Transportation Department

4080 Lemon Street, 9th Floor
P.O. Box 1629
Riverside, California 92502-1629
Phone: (951) 955-6880

**Riverside County Transportation and Land
Management Department**

4080 Lemon Street
Riverside, California 92502
Phone: (951) 955-1800

March Joint Powers Authority

Ms. Danielle Wheeler, Executive Director
14205 Meridian Parkway
March Air Reserve Base, California 92518
Phone: (951) 656-7000



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

February 8, 2017

TTL Associates, Inc.
44265 Plymouth Oaks Boulevard
Plymouth, Michigan 48170
ATTN: Paul J. Jackson, Environmental Scientist
pjackson@tlassoc.com

Initial Project Consultation for the Riverside National Cemetery Expansion

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned project. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the CEQA document. Please forward a copy of the CEQA document directly to SCAQMD at the address in our letterhead. **In addition, please send with the CEQA document all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the Lead Agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing

dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*”) can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board’s *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD’s CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD’s Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or Gordon Mize, Air Quality Specialist by e-mail at gmize@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor
Planning, Rule Development & Area Sources

JASON E. UHLEY
General Manager-Chief Engineer



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

210531

RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT

February 9, 2017

TTL Associates, Inc.
44265 Plymouth Oaks Boulevard
Plymouth, MI 48170

Attention: Paul J. Jackson

Re: Riverside National Cemetery Expansion

The 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 has not reviewed the proposed project in detail and the following comment does 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.

GENERAL INFORMATION

This project may require a National Pollutant Discharge Elimination System (NPDES) permit from the State Water Resources Control Board. Clearance for grading, recordation, or other final approval should not be given until the City has determined that the project has been granted a permit or is shown to be exempt.

If this project involves a Federal Emergency Management Agency (FEMA) mapped flood plain, then the City should require the applicant to provide all studies, calculations, plans and other information required to meet FEMA requirements, and should further require that the applicant obtain a Conditional Letter of Map Revision (CLOMR) prior to grading, recordation or other final approval of the project, and a Letter of Map Revision (LOMR) prior to occupancy.

If a natural watercourse or mapped flood plain is impacted by this project, the City should require the applicant to obtain a Section 1602 Agreement from the California Department of Fish and Wildlife and a Clean Water Act Section 404 Permit from the U.S. Army Corps of Engineers, or written correspondence from these agencies indicating the project is exempt from these requirements. A Clean Water Act Section 401 Water Quality Certification may be required from the local California Regional Water Quality Control Board prior to issuance of the Corps 404 permit.

Very truly yours,

A handwritten signature in blue ink that reads "Edwin Quinonez".

EDWIN QUINONEZ
Engineering Project Manager

c: Riverside County Planning Department
Attn: Kristi Lovelady

EO:blm



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

January 25, 2017

Mr. Ed Carroll
California State Historic Preservation Office
1725 23rd Street, Suite 100
Sacramento, CA 95816

RE: Section 106 Consultation on the Expansion of the Riverside National Cemetery through
Redevelopment of the General Archie Old Golf Course

Dear Mr. Carroll,

The VA National Cemetery Administration at Riverside National Cemetery in Riverside, Riverside County, California, proposes to acquire the General Archie Old Golf Course to provide additional gravesite expansion interment space for our nation's Veterans (Attachment A- map). The National Cemetery Administration (NCA) of the U.S. Department of Veterans Affairs (VA) proposes to acquire and develop the Golf Course site to include inground burial sections, public access roads, and columbarium (Undertaking)."

Brief History of the GAO Golf Course Property

The General Archie Old Golf Course is an 18-hole course located southwest of the Riverside National Cemetery. From 1940 to 1945, the course, as well as approximately 8,000 additional acres, were part of Camp Haan, a U.S. Army installation associated with March Air Field, an Army Air Force base. Camp Haan served as a training center for American troops and a Prisoner of War camp. It formally closed in August 1946. March Air Force Base leadership redeveloped the acreage into a golf course in the mid-1950s. After its opening, Noted American comedian and actor Bob Hope hosted numerous charity golf tournaments at the course. The course was renamed for Lt. General Archie J. Old Jr., a former commander of March AFB, in 1978.¹

In 1996, March Air Force Base was realigned in accordance with the Base Realignment and Closure (BRAC) program. Redevelopment of the property is the responsibility of the March Joint Powers Authority (MJPA). The GAO Golf Course is operated by Donovan Brothers Golf, LLC.

Area of Potential Effect

The proposed acquisition of the GAO Golf Course would alter the existing boundaries of the Riverside National Cemetery and the GAO Golf Course; NCA has determined that the full acreage of both properties is the APE.

Proposed redevelopment of the GAO Golf Course includes installation of headstones and, possibly, columbarium(a). These headstones will have no effect on the viewshed of other historic properties. Other than the National Cemetery, there are no adjacent historic properties with viewsheds potentially affected. Installation of columbarium(a) will have no effect on nearby historic properties.

¹ March Joint Powers Authority, Draft Vision 2030: March JPA General Plan, March 2010, http://marchjpa.com/documents/docs_forms/draft_general_plan.pdf, 1-4-1-5.

Identification of Historic Properties

Built Resources

NCA conducted a records and literature search of CA SHPO files related to built resources on November 8, 2016. As part of the required analysis under BRAC, all acreage that was part of March AFB in the 1990s, including the GAO Golf Course, was surveyed several times to identify historic properties. These surveys did not identify any historic built properties located within the boundaries of the GAO Golf Course.² The same BRAC surveys determined that the original acreage of March Air Field contained a historic district. In 1994, the National Park Service listed the March Field Historic District in the National Register of Historic Places under Criterion A: Military, and Criterion C: Architecture. The historic district is limited to the earliest building and landscape elements of the base. This historic district is located approximately one mile from the GAO Gold Course. Neither the GAO Golf Course nor the Riverside National Cemetery are included in the March Field Historic District.³

In November 2016, an architectural historian who exceeds the Professional Qualification Standards established by the Secretary of the Interior visited the GAO Golf Course to identify properties in the area that are more than 50 years of age and that retain sufficient integrity to warrant listing in the National Register of Historic Places. The March Air Field Golf Course opened as a 9-hole course in the early 1950s; it was expanded and opened as an 18-hole course in 1958.⁴ The course still uses the original clubhouse, although the building was renovated in 2012.⁵ The course has not been significantly altered since its opening. The feeling and association of the course have been lost due to the closure of March AFB. Though the property retains integrity of location, materials, workmanship, and design, and is more than fifty years of age, the property is not a significant example of a regional golf course. No evidence has been located that identifies the course as the work of a master course architect, nor does the landscape rise to the level of individually eligible. The course was the site of several charity golf tournaments hosted by comedian and actor Bob Hope, but Mr. Hope's generosity and love of golf extended to courses around the United States. The course also does not represent the significant military accomplishments of March AFB, nor does it contribute to the March Field Historic District. The General Archie Old Golf Course is not eligible for the National Register of Historic Places.

None of the 27 properties listed in the California Historical Landmarks in Riverside County are located within or adjacent to the APE.⁶ There are no National Historic Landmarks located within or adjacent to the APE.⁷

In 2011, the National Park Service issued a policy determining that all National Cemeteries, regardless of date of founding, eligible for listing in the National Register of Historic Places.⁸ The Riverside National

² Laurence Spann, *Report on a Cultural Resources Survey for Three Proposed Construction Locations on March Air Force Base*, 1986; Archaeological Research Unit, University of California- Riverside, *An Archaeological Assessment of 970+ Acres of Land Located on March Air Force Base, Riverside County, California*, 1987; ASM Affiliates, Inc, *An Intensive Survey of Approximately 2,500 Acres of March Air Force Base, Riverside County, California*, 1996.

³ National Register of Historic Places, March Field Historic District, Riverside, Riverside County, California, National Register #94001420.

⁴ March Joint Powers Authority, Draft Vision 2030, 2-12.

⁵ Mirjam Swanson, "GOLF NOTEBOOK: General Old's new look has old flavor," *The Press Enterprise*, June 24, 2012, <http://www.pe.com/articles/course-657121-hope-old.html>.

⁶ California Office of Historic Preservation, California Historical Landmarks: Riverside County, http://ohp.parks.ca.gov/?page_id=21452.

⁷ National Park Service, database of National Historical Landmarks, <https://www.nps.gov/nhl/find/statelists/ca/CA.pdf>.

Cemetery therefore is eligible for listing in the National Register of Historic Places and should be afforded consideration in accordance with the NHPA. However, that NPS policy clarification specifically recognizes that “National cemeteries continue to expand,” and that they are “ever-changing.”⁹ The proposed expansion of the National Cemetery therefore does not constitute an adverse effect to that historic property.

Archaeological Resources

NCA conducted a records and literature search of CA SHPO files related to archaeological resources on November 8, 2016. Cultural resource surveys of March Air Field/March AFB conducted between 1900 and 1995 identified 35 prehistoric sites and one historic site. In 1996, ASM Affiliates, Inc. completed an intensive pedestrian survey of approximately 2,500 acres of the former March AFB, including the GAO Golf Course. Archaeologists recorded 68 archaeological deposits: 60 prehistoric sites, 5 historic sites, and 3 isolated artifacts.¹⁰ Nearly all prehistoric sites related to milling practices of Native Americans, i.e. tools used to process plants into foodstuffs. The majority of the historic sites related to military occupation of the property. None of these archaeological deposits were recorded within the boundaries of the GAO Golf Course.

Traditional Cultural Properties

Following an ethnographic study, the Environmental Impact Statement completed in 1999 determined that there are no Traditional Cultural Properties (TCPs) on any of the grounds of former March AFB, including the GAO Golf Course.¹¹

Effects of the Proposed Project on Historic Properties

Adverse effects of an undertaking occur when the action directly or indirectly alters the characteristics of a historic property that qualify it for inclusion in the National Register of Historic Places. Reasonably foreseeable effects that are caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative also need to be considered.

No eligible buildings, landscapes, archaeological sites, or Traditional Cultural Properties were identified inside the Area of Potential Effect of the proposed National Cemetery expansion project. The proposed project will have a direct effect on the physical boundaries of the Riverside National Cemetery, which will expand from its current limitations; however, this effect will not be adverse. Therefore, the NCA finds that this project will have No Adverse Effect to Historic Properties. We request your comments and concurrence on this finding.

NCA takes seriously the potential to unintentionally affect human remains. NCA therefore will include the following unanticipated discoveries plan in the construction contract to redevelop the GAO Golf Course should NCA acquire the property:

If properties are discovered that may be historically significant or unanticipated adverse effects to historic properties are identified, NCA shall implement the following discovery plan:

- *If human remains or associated burial items not related to NCA burials are encountered during excavations or during construction activities, NCA shall consult with the most likely descendant(s), as identified by the California Native American Heritage Commission (NAHC), on the sensitive and dignified treatment and disposition of Native American human remains and associated items.*

⁸ National Park Service, National Register Eligibility of National Cemeteries – A Clarification of Policy – A Clarification of Policy (9/8/2011), September 2011.

⁹ Ibid, p. 1.

¹⁰ ASM Affiliates, Inc, “An Intensive Survey of Approximately 2,500 Acres of March Air Force Base, Riverside County, California, 1996:iii.

¹¹ March Joint Powers Authority, *Environmental Assessment- Recreational Development/Golf Course at march Air Force Base, California*, 1999, 3-7.

- *If construction affects a previously unidentified archaeological property, NCA shall immediately stop construction activity within 25 feet of the property and implement all reasonable measures needed to avoid, minimize, or mitigate further harm to the property including, but not limited to, fencing and/or covering with tarps.*
- *Within 48 hours of the discovery, NCA shall require an archaeologist who meets the Secretary of the Interior's Professional Qualification Standards in Archaeology (36 CFR 61) to assess the discovery. If determined to be potentially eligible for inclusion in the NRHP, NCA shall provide initial notification to SHPO and any Indian tribe that might attach religious or cultural significance to the affected property. Notification shall include, to the extent such information is available: a description of the action; a description of the nature and extent of the historic property or properties affected; an assessment of National Register of Historic Places eligibility of any historic properties affected; the type and extent of any damage to the historic property or properties affected; any prudent and feasible treatment measures that would take adverse effects into account; and a request for comments. NCA may furnish this information through correspondence, hard copy, electronic media, telephone, or meetings, at its discretion, taking into account the corresponding capabilities of the consulting parties, and shall document this process for the administrative record.*
- *Should any of the notified parties respond with comments within 72 hours of the initial notification of the discovery, or indicate that they wish to be involved in resolving the effects, NCA shall take into account their comments or continue consultation with any commenting parties. NCA shall inform SHPO and THPO(s) of relevant data as it becomes known. NCA shall determine the time frame for any further consultation, taking into account the qualities of the property, consequences of construction delays, and interests of consulting parties. Following the conclusion of any further consultation, NCA shall take all comments received into account and may carry out actions to resolve any effects. Failure of any notified party to respond within 72 hours of the notification shall not preclude NCA from proceeding with their proposed actions.*

We thank you for your review of this NCA undertaking. If you have any questions about this project, please contact Michael Hayes at Michael.Hayes6@va.gov, 202-382-2767.

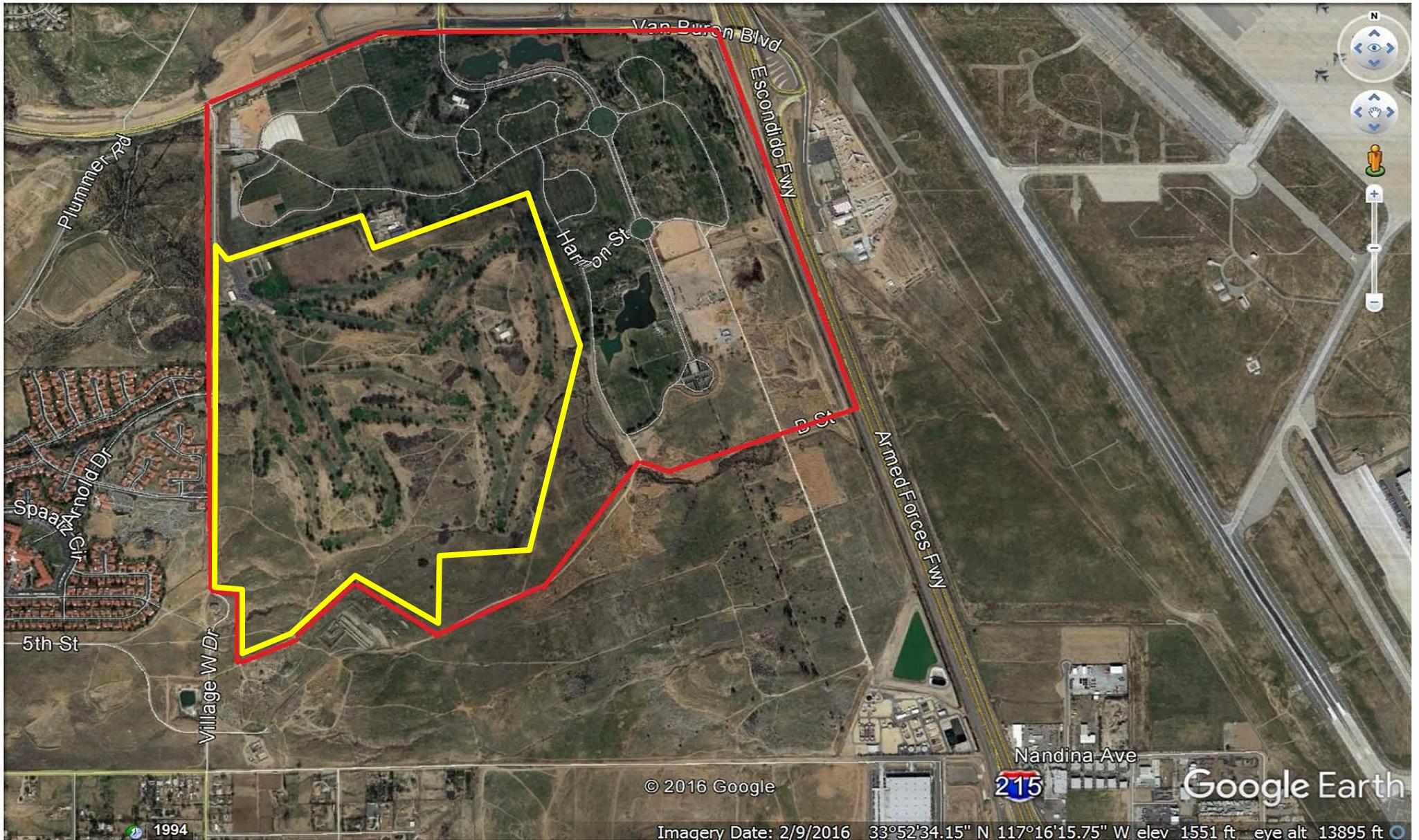
Sincerely,



Michael Hayes
Realty Specialist
Office of Real Property

References:

- Archaeological Research Unit, University of California- Riverside, *An Archaeological Assessment of 970+ Acres of Land Located on March Air Force Base, Riverside County, California*, 1987.
- ASM Affiliates, Inc, *An Intensive Survey of Approximately 2,500 Acres of March Air Force Base, Riverside County, California*, 1996.
- California Office of Historic Preservation, California Historical Landmarks: Riverside County, http://ohp.parks.ca.gov/?page_id=21452.
- Department of the Air Force Headquarters, Strategic Air Command, Offutt AFB. *Final Environmental Impact Statement Realignment of March Air Force Base, California*. July 1991.
- March Joint Powers Authority, Draft Vision 2030: March JPA General Plan, March 2010, http://marchjpa.com/documents/docs_forms/draft_general_plan.pdf.
- *Environmental Assessment- Recreational Development/Golf Course at March Air Force Base, California*, 1999.
- National Park Service, database of National Historical Landmarks, <https://www.nps.gov/nhl/find/statelists/ca/CA.pdf>.
- National Register Eligibility of National Cemeteries – A Clarification of Policy – A Clarification of Policy (9/8/2011), September 2011.
- National Register of Historic Places, March Field Historic District, Riverside, Riverside County, California, National Register #94001420.
- Spanne, Laurence, *Report on a Cultural Resources Survey for Three Proposed Construction Locations on March Air Force Base*, 1986.
- Swanson, Mirjam, “GOLF NOTEBOOK: General Old's new look has old flavor,” *The Press Enterprise*, June 24, 2012, <http://www.pe.com/articles/course-657121-hope-old.html>.



**Area of Potential Effect
Riverside National Cemetery/General A. Old Golf Course
Riverside County, California**

Base map courtesy of Google Earth



**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

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December 29, 2017

In reply refer to VA 2017 0206 001

Maina Gakure, DBA
Department of Veterans Affairs
Office of Construction & Facilities Management
810 Vermont Avenue NW (003C)
Washington, DC 20420

Subject: Section 106 Consultation for the Riverside National Cemetery Expansion Project,
Riverside County, California

Dear Mr. Gakure:

The California State Historic Preservation Officer (SHPO) received your letter on December 01, 2017 continuing consultation on the Riverside National Cemetery Expansion Project in order to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulations at 36 CFR Part 800. The U.S. Department of Veterans Affairs (VA) has provided the following document for review:

- *Confidential – Archaeological Survey Report for the Proposed Expansion of the Riverside National Cemetery Project, Located in Riverside County, California* (Environmental Intelligence, LLC, August 2017)

The VA is proposing to expand the current 941-acre Riverside National Cemetery by 315 acres, to a total of 1,256 acres. The expansion will encompass the existing General Old Golf Course and undeveloped land to the southeast. The Area of Potential Effects (APE) has been defined as 705 acres, including the existing Riverside National Cemetery property and the proposed expansion area.

Historic property identification efforts were conducted by Environmental Intelligence, LLC (EI) and included a records search at the Eastern Information Center and a pedestrian archaeological survey. EI relocated nine previously recorded archaeological sites and recorded three additional sites in the APE. Eleven of the sites represent prehistoric bedrock milling stations with no associated artifacts. Previous testing in the project area indicates that the area consists of shallow soils of less than 30 centimeters in depth, and no subsurface artifacts are expected to occur. Three previously recorded archaeological sites and one historic isolate were not relocated during the present survey. The VA previously provided an evaluation of the General Archie Old Golf Course, in a letter dated January 25, 2017. One additional built environment resource, a historic unroofed hut, is

located in the APE but is not within the proposed expansion area. A list of these resources is provided in Table 1 below, along with a response to the VA's eligibility determinations.

Table 1: Resources Identified in Riverside National Cemetery Expansion APE

Resource	Description	VA Eligibility Determination	SHPO Concurrence
CA-RIV-5399	Prehistoric bedrock milling stations (BRMs) 3 milling slicks	Not Eligible	Concur not eligible under Criterion D
CA-RIV-5402	BRMs 3 milling slicks	Not Eligible	Concur not eligible under Criterion D
CA-RIV-5406	BRM 1 milling slick	Not Eligible	Concur not eligible under Criterion D
CA-RIV-5407	BRM 1 milling slick not relocated during current survey	Not Eligible	Previously determined not eligible through Sec 106 consensus process in 1998
CA-RIV-5408	BRMs 2 milling slicks	Not Eligible	Concur not eligible under Criterion D
CA-RIV-5409	BRMs 5 milling slicks	Not Eligible	Concur not eligible under Criterion D
CA-RIV-5410	BRMs 2 milling slicks	Not Eligible	Concur not eligible under Criterion D
CA-RIV-5411	BRMs 1 milling slick not relocated during current survey	Not Eligible	Previously determined not eligible through Sec 106 consensus process in 1998
CA-RIV-5413	BRMs 2 milling slicks, 1 basin milling feature	Not Eligible	Concur not eligible under Criterion D
CA-RIV-5444H	Historic concrete markers attached to Boulder	Not Eligible	Concur not eligible
CA-RIV-5455H	Concrete foundations	Not Eligible	Concur not eligible
P-33-24180	Quonset Hut	Previously determined not eligible	No record of concurrence found
ERG-VA-RIV-Site001	Historic can scatter	Not Eligible	Concur not eligible
ERG-VA-RIV-Site002	BRMs 4 milling slicks	Not Eligible	Concur not eligible under Criterion D
ERG-VA-RIV-Site003	BRM 1 milling slick	Not Eligible	Concur not eligible under Criterion D
NA	General Archie Old Golf Course	Not Eligible	Concur not eligible

The VA's letter states that they have provided the cultural report to interested Native American tribal parties, and have received a request that an archaeological landscape study and report be prepared. According to the letter, this study is being undertaken by a different subcontractor. The landscape study was not provided for review and no additional information about the Native American consultation process was provided.

The VA has determined that all of the resources identified in the APE are not eligible for listing on the National Register of Historic Places (NRHP) and that therefore, no impacts to historic properties are expected to occur as part of the proposed Project. After reviewing the submitted materials, the following comments are provided:

- Pursuant to 36 CFR 800.4(c)(2), the VA has determined that CA-RIV-5444H, CA-RIV-5455H, ERG-VA-RIV-Site001, and the General Archie Old Golf Course are not eligible for listing on the NRHP. **I concur.**
- Pursuant to 36 CFR 800.4(c)(2), the VA has determined that CA-RIV-5399, CA-RIV-5402, CA-RIV-5406, CA-RIV-5408, CA-RIV-5409, CA-RIV-5410, CA-RIV-5411, CA-RIV-5413, ERG-VA-RIV-Site002, and ERG-VA-RIV-Site003 are not eligible for listing on the NRHP. **I concur that these sites are not eligible under Criterion D only.** The VA's letter indicates that additional tribal consultation and a landscape study are being completed. It is unknown, based on the information provided, if tribal consultation has indicated that these sites are ascribed cultural or religious values. Please provide an evaluation of these sites under NRHP Criteria A-C based on information provided through the consultation process.
- Please provide an update with any comments/concerns received by Native American consulting parties and the VA's response to such comments.
- Please submit the DPR 523 forms for the newly recorded resources to the Eastern Central Information Center for assignment of primary numbers. For future consultations, OHP requests that primary numbers be assigned to resources prior to consulting on eligibility.
- Pursuant to 36 CFR 800.4(d)(1), at this time I am unable to agree with the VA's finding of *no historic properties affected* for this undertaking, as the historic property identification efforts remain incomplete.

I look forward to continuing consultation with the VA for this undertaking under 36 CFR Part 800. For more information or if you have any questions, please contact Koren Tippett, Associate State Archaeologist, at (916) 445-7017 or koren.tippett@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer



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January 11, 2018

In reply refer to VA 2017 0206 001

Maina Gakure, DBA
Department of Veterans Affairs
Office of Construction & Facilities Management
810 Vermont Avenue NW (003C)
Washington, DC 20420

Subject: Section 106 Consultation for the Riverside National Cemetery Expansion Project,
Riverside County, California

Dear Mr. Gakure:

The California State Historic Preservation Officer (SHPO) received your letter on January 10, 2017 continuing consultation on the Riverside National Cemetery Expansion Project in order to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended) and its implementing regulations at 36 CFR Part 800. The U.S. Department of Veterans Affairs (VA) is providing additional information to respond to my comments in a letter dated December 29, 2017.

The VA is proposing to expand the current 941-acre Riverside National Cemetery by 315 acres, to a total of 1,256 acres. The VA previously consulted on their historic property identification efforts and eligibility determinations. I concurred that the following sites are not eligible for the National Register of Historic Places (NRHP) under Criterion D, but requested that they be evaluated under Criteria A-C: CA-RIV-5399, CA-RIV-5402, CA-RIV-5406, CA-RIV-5408, CA-RIV-5409, CA-RIV-5410, CA-RIV-5411, CA-RIV-5413, ERG-VA-RIV-Site002, and ERG-VA-RIV-Site003. I also requested an update on the VA's Native American consultation efforts for the proposed undertaking.

The VA sent request for comment letters to Native American tribes with interest in the area on April 27, 2017. The Soqoqa Band of Luiseno Indians requested that a landscape study of the APE be completed. Dr. Mitch Marken completed a confidential focused landscape study using the Soqoqa's internal records to determine if the archaeological sites in the APE are part of a significant ethnographic landscape. Following this study, the VA has determined that these sites are not eligible for the NRHP under Criteria A-C. Attachment 1 to this letter contains a list (Table 1) of the sites identified during the VA's historic property identification efforts and their eligibility determinations.

Based on the above information, the VA has made a finding of *No Historic Properties Affected* for the proposed undertaking. After reviewing the submitted materials, the following comments are provided:

- Pursuant to 36 CFR 800.4(c)(2), the VA has determined that CA-RIV-5399, CA-RIV-5402, CA-RIV-5406, CA-RIV-5408, CA-RIV-5409, CA-RIV-5410, CA-RIV-5411, CA-RIV-5413, ERG-VA-RIV-Site002, and ERG-VA-RIV-Site003 are not eligible for listing on the NRHP under Criteria A-D. **I concur.**
- Please submit the DPR 523 forms for the newly recorded resources to the Eastern Central Information Center for assignment of primary numbers. For future consultations, OHP requests that primary numbers be assigned to resources prior to consulting on eligibility.
- Pursuant to 36 CFR 800.4(d)(1), **I do not object** to a finding of *no historic properties affected* for this undertaking.

Be advised that under certain circumstances, such as unanticipated discovery or a change in project description, the VA may have additional future responsibilities for this undertaking under 36 CFR Part 800. For more information or if you have any questions, please contact Koren Tippett, Associate State Archaeologist, at (916) 445-7017 or koren.tippett@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

Attachment 1

Table 1: Resources Identified in Riverside National Cemetery Expansion APE

Resource	Description	VA Eligibility Determination	SHPO Concurrence
CA-RIV-5399	Prehistoric bedrock milling stations (BRMs) 3 milling slicks	Not Eligible	Concur not eligible
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