Law Office of Abigail Smith
A Professional Corporation
2305 Historic Decatur Road, Suite 100, San Diego, CA 92106

Abigail A. Smith, Esq.
Email: abby@socalceqa.com
Telephone: (951) 808-8595

VIA E-MAIL AND U.S. MAIL

February 20, 2024

City of Beaumont City Council
Beaumont Civic Center
550 E. 6th Street
Beaumont, CA 92223
nicolew@beaumontca.gov
emorgan@beaumontca.gov
CKendrick@beaumontca.gov

Re: Public Comments – Beaumont Pointe Specific Plan Project including Environmental Impact Report

Dear City of Beaumont City Council:

Please accept this letter on behalf of the Sierra Club regarding the Beaumont Pointe Specific Plan Project ("the Project") including the Environmental Impact Report ("the EIR"). Sierra Club understands that the City's Planning Commission considered the Project at its meeting of January 10, 2024, and that the Project will now be considered by the City Council on some date in the near future.

The Project is a request for a General Plan Amendment, a Pre-Zone, and related land use approvals for purposes of developing a 539.9-acre site with approximately 5,331,000 square feet of total development space consisting of commercial and industrial land uses, including approximately 336,000 square feet of commercial uses and 4,995,000 square feet of warehousing/logistics space over six industrial planning areas (232.6 acres). The industrial land uses will include users such as warehouse/storage, fulfillment center, high cube warehouse, cold storage warehouse and e-commerce operations. The industrial land uses will promise approximately 94% of the planned uses at the site.

The Project site is located in the San Gorgonio Pass Area of unincorporated Riverside County and in the City's Sphere of Influence. The site is currently zoned Controlled Development Areas with a minimum 20-acre lot size to allow one-family dwellings, agricultural and animal raising uses. The site is located within the Pass Area of the Riverside County General Plan and Pass Area Plan. According to the Project's Draft EIR, the Pass Area Plan "focuses on preserving the unique features found only in the Pass Area." (Draft EIR p. 3-5.) The Draft EIR states the Pass Area "is a distinctive geographical area between the Coachella, San Jacinto, and Moreno Valleys." (Draft

EIR p. 3-4.) The Project site is currently vacant and undeveloped except for the paved portions of the Jack Rabbit Trail. The Draft EIR describes the site as being "nestled in the rolling topography of the northern terminus of the San Jacinto Mountains." (Draft EIR p. 3-3.) The Project contains natural vegetation communities and drainage courses. (*Id.*) It contains hillsides, canyons, valleys, and "steep" ridges. (*Id.*; DEIR p. 4.1-2.) SR-60 is located to north of the Project site; rural mountainous lands are located directly to the south/southwest/southeast including natural drainage courses, unmarked trails, and the Jack Rabbit Trail. Lands to the south/southwest are designated for conservation under the Western Riverside County MSHCP. Similarly, the mountainous areas to the west are designated for conservation within the MSHCP.

By build-out, the Project is anticipated to generate **a total of 16,266 vehicle trips per day** including **2,240 daily big-rig truck trips** (Draft EIR p. 4.13-24). The Project funnels these 2,240 big rig trucks on local roadways such as 4th Street and Portero Boulevard that is shared with local traffic. Vehicles will not access the Project site directly from SR-60 but rather must use local streets for ingress/egress to the site. The Project's substantial number of vehicle trips contribute to the Project's significant air quality, greenhouse gas emission, noise, and "VMT" (traffic) impacts.

Due to the site's topography, Project entails substantial grading of natural landforms and areas within the City's distinctive hillside areas including within "open space" areas inside the Project footprint. Natural and unique landforms will be replaced by manufactured slopes and flat-roofed, 60-foot box-style warehouse buildings as well as light poles (40-45 feet), paved roadways, and potentially a 125-room hotel. The Project proposes to expand development south of SR-60 by bringing urban infrastructure to an undeveloped natural area, creating the potential for further development of undeveloped areas in unincorporated Riverside County. For instance, the Project will extend 4th Street to make a roadway connection to the Project site.

The Project is located on a hillside at a relatively steep grade and proposes one primary vehicle access point. A secondary emergency access point is provided according to the EIR. In other words, the entirety of the Project will depend on one point of vehicular access, perhaps two depending on the nature of fire event, for evacuation purposes. This is in combination with evacuating traffic of existing industrial buildings along 4th Avenue (two Amazon facilities, the future Hidden Valley warehouse plus additional) in addition to residents of nearby neighborhoods.

Warehouse buildings are designed with loading docks on both sides (*i.e.,* maximized for industrial operations) despite being adjacent to an MSCHP Conservation Area to the south and being visible from vantage points to the north.

The energy efficiency measures identified in Draft EIR pp. 3-18 – 3-19 are not requirements of the Project through the CEQA mitigation program. All measures identified in or relied upon in the Draft EIR must be made enforceable through the Project's CEQA mitigation program. There are numerous other, feasible mitigation measures that must be adopted before the Project with significant impacts can be approved. We have identified additional measures throughout this letter. Finally, the EIR must examine a reasonable range of project alternatives and the City must adopt the environmentally superior alternative absent adequate findings in the record of infeasibility.

In accordance with the California Environmental Quality Act ("CEQA"), the EIR must be revised with further analysis, and it must identify additional mitigation for significant impacts. We therefore respectfully urge the Council to continue this Project until further action is taken towards appropriate analysis and mitigation of Project impacts.

Aesthetic Impacts

The Project will result in the conversion of the 539-acre site from vacant, undeveloped, natural lands and to large, box-style warehouse buildings up to 60 feet in height. Buildings will be constructed on flat concrete pads along an existing steep ridgeline characterized by rolling hills and natural vegetation. The Project would *wholly replace* natural landforms thereby substantially and permanently altering ridgelines and hillsides which are considered to be "significant" natural and visual resources according to the EIR. The Project proposes a massive amount of grading ("substantial earthwork") of steep ridgelines and hillsides. Natural slopes will be replaced by "manufactured slopes" including in PA 9 and in open space areas. The Draft EIR's analysis does not support the conclusion of less than significant. The EIR recognizes that "landforms in mid-ground views (PAs 1-8) would be altered for the development." (DEIR p. 4.1-13.)

The record does not disclose the level of impact. There are no "before" photographs of the site with sufficient detail to show how the Project will impact it, and there are no visual simulations of the actual development, *i.e.*, there are no visual depictions to show the buildings, lighting, and roadways including relative to surrounding vantage points such as from homes to the east of SR 60 or from SR 60. The record contains Figure 4.1-2, but this is not sufficient to provide realistic representations of Project buildings from surrounding vantage points (*see e.g.* Figure 4.3.-1). This single visual model does not illustrate what the buildings will actually look like and do not show the urban infrastructure including lighting (40-60 foot light poles) including at nighttime. Nor does it show the commercial buildings including 125-room hotel which presumably will be a prominent feature on the hillside given its planned location on the northeast corner of the site. Further, the EIR does not discuss whether the site contains rock outcroppings and whether these will be altered because of the Project. The permanent destruction of rock outcroppings must be disclosed and mitigated. The EIR indicates that some "blasting" may occur of landforms.

Based on the permanent alterations of natural landforms that will occur including flattening ridges and hillsides and replacing these natural landforms with massive box-style industrial buildings and related infrastructure and roadways there are also conflicts with policies of the City's General Plan that are intended to preserve, protect and minimize impacts to these resources, including policies 3.12.1, 3.12.2, 3.12.3, 3.12.4, 8.6.1, 8.6.3, 8.6.4, 8.9.2, 8.9.3, and 8.9.4. Given the importance placed on the preservation of natural landforms through the General Plan, and the permanent loss of these resources as a result of the Project, the EIR's finding of less than significant is not supported.

Moreover, the Project's lighting impacts have not been assessed as to the MSHCP Conservation Area. Artificial nighttime lighting negatively impacts animal species in a variety of ways and it has not been shown that the Project's lighting plan will adequately address the "edge

effects" of this Project on the existing conservation area.[1] [2] [3]

Appropriate mitigation must be adopted before the Project can be approved. This could include limiting the height of the buildings to 45 feet for example; locating truck docks on the southside of buildings only (at present loading docks are located on both sides of buildings); reducing the number of buildings or shrinking the size of the buildings including by way of "clustering" of development to the least sensitive areas of the site; increasing landscaping to buffer buildings; and avoidance of the most sensitive resources such as rock outrcroppings.

Air Quality Impacts

The Project will result in significant operational air quality emissions. In terms of NOx emissions, the Project at full operation will exceed the applicable threshold of significance by approximately nine times (total NOx emissions = 494.5 lbs per day compared to SCAQMD threshold of significance of 55 lbs per day). If construction and operation phases overlap, these emissions are far greater (675 lbs per day). (EIR 4.3-41 - 4.3-42.) Despite these significant operational impacts, the EIR fails to adopt all feasible mitigation to reduce these impacts consistent with CEQA.

The majority of the Project's air quality emissions are caused by mobile emissions. An EIR's central purpose is to identify a project's significant environmental effects and then evaluate ways of avoiding or minimizing them. (Cal. Public Resources Code, §§ 21002.1(a), 21061.) The City must adopt *any* feasible mitigation measure that can substantially lessen the project's significant air quality environmental impacts including due to mobile emissions. (Cal. Pub. Res. C. § 21002; State CEQA Guidelines, § 15002(a)(3).)

Title 24/Cal Green does not currently require the installation of electric vehicle (EV) charging units for cars or trucks; the Building Code requires electrical conduit for vehicle charging stations *but not charging units*. The Project must be conditioned to require the installation of electric vehicle (EV) charging units at the time of occupancy of each phase of the development. EV vehicle charging units are entirely feasible and standard practice.[4] The EIR mentions EV units in the discussion but none are required through the mitigation program and the record contains conflicting information as to how many units will be installed, where they will be installed, or when these units will be installed and operational.

The Project should also be conditioned to require EV charging units for heavy duty and

---

[1] https://darksky.org/resources/what-is-light-pollution/effects/wildlife-ecosystems/
Hyperlinks and their contents cited in this letter are fully incorporated herein by reference, and their contents are summarized in the body of the letter.
[2] https://kids.niehs.nih.gov/topics/natural-world/wildlife/ecology/lighting
[3] https://www.earthobservatory.nasa.gov/images/145767/night-lights-can-disrupt-wildlife
[4] https://www.sdge.com/residential/electric-vehicles/power-your-drive/public-charging#types

medium duty trucks. Level 3/DC Fast (or Quick) Chargers (DCFC) should be required[5] (*see id.*; *see also* **Attachment A** hereto [big rig truck with battery size of 550kw and range of 250 miles take approximately 24 hours to charge with a Level 2 charger].) This comment also applies to "medium duty" vehicles such as delivery vans. *See* [6] [FedEx vans charge in hours with DC quick charger/Level 3].) Chargers must be required that are able to charge the battery of a Class 8 (heavy duty/big rig) truck as well as have the battery range needed to ensure these trucks could meet a "two shift" or even a "one shift" schedule. These chargers are feasible and available on the commercial market.[7]

The Project should adopt further measures to reduce air quality impacts, including:

- Constructing building roofs with "light colored roofing materials." Cool roofs retain less heat and reflect more sunlight, thus lowering energy demand and reducing the "heat island" effect of a building. The Project must be conditioned to use roofing materials with a solar reflectance index ("SRI") of 78 for at least 75% of the roof surface (portions not covered in solar), consistent with USGBC standards. To provide measurable environmental benefit, the roofing material must be at the *highest possible* rating. *See* [8]
- Obtaining LEED certification to the most current USGBC[9] rating system for all industrial buildings, where such certification would require the applicant to implement sustainability measures that provide environmental benefits and off-set impacts.
- Installing concrete, preferably white concrete, in all parking areas. Light-colored concrete is more reflective of sunlight, thus employing concrete in all parking areas will reduce the "heat island" effect of the Project. [10] [11] Among other benefits, cooler surfaces and air reduce the need for air conditioning in vehicles.
- Providing landscaping in parking areas to provide 50% shade coverage within 10 years of operations. This can also reduce "heat island" effects and reduce the need for air conditioning.
- Installing and utilizing solar power for 100% of the facility's total electricity demand including electric vehicle parking in parking areas and automation within buildings. Solar power is entirely feasible and is particularly appropriate for a Project of this size, scale, and location.
- Including within buildings a "truck operator" lounge of a reasonable size which is available to truck operators with seating, restrooms, vending machines, and showers if size allows. The purpose of this lounge is to reduce the need for operators to wait in their cabs running either their diesel truck engine or diesel "APUs" either on- or

[5] https://blog.evbox.com/level-3-charging-speed
[6] https://www.carscoops.com/2018/11/fedex-adds-1000-china-built-chanje-f8100-electric-vans-fleet/
[7] https://polb.com/port-info/news-and-press/charging-station-to-power-electric-trucks-in-port-11-30-2023/
[8] https://www.energy.gov/sites/prod/files/2013/10/f3/coolroofguide.pdf
[9] https://www.usgbc.org/leed
[10] https://coolcalifornia.arb.ca.gov/cool-pave-how
[11] https://heatisland.lbl.gov/coolscience/cool-pavements

off-site. Signage shall also be provided notifying truck operators that a lounge(s) is available for their use.

- The California Attorney General has published a list of best practices for warehouse developments: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf These include:
  - Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
  - Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
  - Requiring on-site equipment, such as forklifts and yard trucks, to be electric *only* with the necessary electrical charging stations provided.
  - Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
  - Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
  - Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
  - Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.

- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

The EIR finds that NOx (diesel-related) impacts are significant (approximately nine times the threshold of significance). In the aggregate, the southern-California "goods movement network" is a "major source of emissions that contribute to the region's air pollution," and the southern California area "continues to have the worse air quality in the nation." (https://www.ca-ilg.org/sites/main/files/file-attachments/f2012rtpscs.pdf?1383110821) A "key component of air pollution is nitrogen oxides (NOx). NOx is emitted whenever fuel is combusted and reacts in the air to form ozone (smog) and fine particulates." (*Id.*) Despite "aggressive strategies" in the South Coast Air Basin, "it is estimated that NOx emissions will need to be reduced by approximately two-thirds in 2023 and three-quarters in 2030." (*Id.*) Addressing NOx impacts associated with mobile sources is key to mitigating the Project's significant air quality impacts. According to the SCAQMD's Blueprint for Clean Air (2016)[12], the southern California air basin will require approximately a 65 percent reduction in NOx emissions, *above and beyond existing measures*, to meet air quality standards.

The Project should thus establish fleet efficiency requirements for vehicle fleets. This should include, at a minimum, requirements that industrial tenants shall use exclusively zero emission light and medium-duty delivery trucks and vans; shall use only zero emission service equipment such as forklifts and yard trucks (electric only/*no natural gas*); and shall use near-zero and zero-emission technologies in heavy-duty applications such as "last mile delivery."[13] As the State moves toward its goal of zero emission goods movement, the City must ensure that the Project is in line with this important objective by also requiring the *phase-in* of zero emission or clean technology for *heavy duty* trucks. According to CARB, actions to deploy both zero emission and cleaner combustion technologies will be essential to meet air quality goals in California particularly with respect to goods movement. [14] Additional, feasible mitigation for operational air quality impacts includes the phase-in of electric, hybrid electric, hydrogen electric, or battery operated (*i.e.*, non-diesel) trucks. The Project should be conditioned to adopt a "Diesel Minimization Plan" whereby zero emission trucks are phased in, *e.g.*, 25% of truck fleets shall use zero emission technology by 2030, and increase that percentage by 10% per year, until 100% of trucks operating on sites are zero emission. This approach to mitigation is consistent with California regulations regarding phase-in of electric vehicles.[15] [16] (California requiring

[12] https://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-blueprint-revdf.pdf?sfvrsn=2

[13] https://www.nbcnews.com/tech/tech-news/treated-sacrifices-families-breathe-toxic-fumes-california-s-warehouse-hub-n1265420

[14] https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf

[15] https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035

[16] https://www.cnbc.com/2023/03/31/california-requires-half-of-heavy-trucks-sales-to-be-electric-by-

manufacturers to produce zero emission trucks beginning in 2024); *see also* (discussing CARB's Advanced Clean Truck Rule)[17].) A mitigation measure is feasible if it can be achieved in a reasonable period of time. (Guidelines, § 15364.)

The Project must establish a "Truck Route" otherwise MM 4.3-17 is ineffective. The EIR does not indicate the path of truck travel and we could not locate any condition that would require trucks to use a certain path of travel, but it is assumed that trucks will use local roadways for access to SR-60 and I-10.

Finally, to the extent the Project purports to include "project design features" aimed at reducing air quality emissions these must be made enforceable requirements through the Project's CEQA mitigation program. Impacts must also be assessed and disclosed apart from any "design features" especially where they are not mandatory requirements of the Project.

Biological Resources

The Project proposes to construct and operate a massive warehouse complex adjacent to MSHCP Conservation Area(s). This has the potential for disruption and harm to biological species and habitat within the Conservation Area. For instance, noise impacts during the Project's anticipated five years of construction are not shown to be less than significant in terms of impacts to biological resources particularly at nighttime. The Conservation Area is a natural area containing biological resources including habitat for protected species. The Project will entail substantial grading and other construction activities including potentially "blasting" of significant landforms. These impacts have not been properly assessed and mitigated.

The Draft EIR does not demonstrate that noise impacts are less than significant with respect to adjacent conserved lands in terms of the residential noise threshold or otherwise. The record does not demonstrate that Planning Area (PA) 9 would serve as a "buffer" to ensure that noise levels due to Project operations *do not exceed the residential noise standard* in terms of conserved lands located immediately adjacent to the Project site particularly at nighttime.

The Draft EIR acknowledges the potential for "edge effects" to adjacent conserved lands. These include nighttime lighting and noise impacts that will adversely impact the habitat of biological species within the conserved lands. Additional biological mitigation should include: locating building loading docks on the northside of buildings only, or designing buildings so that loading docks and Project roadways are located as far away as possible from sensitive biological areas including the MSHCP Conservation Area. At present buildings have loading docks on *both sides* which is not necessary for operations as buildings will be built on speculation. The Project site maximizes development at the expense of providing a more sensitive transition between uses for the benefit of established biological habitat and known biological resources.

2035.html#:~:text=The%20state%27s%20rule%20requires%20manufacturers,on%20the%20road%20by%202035.

[17] https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet

Greenhouse Gas Emissions

The State of California has committed to aggressive goals for the reduction of the emissions causing global climate change. Executive Order S-3-05 establishes a 2030 target of a 40 percent GHG reduction below 1990 levels; Executive Order S-3-05 establishes a GHG emission reduction target of 80% below 1990 levels by 2050; and Executive Order B-16-2012 establishes a target for the reduction of GHG emissions from the transportation sector of 80% below 1990 levels by 2050. The City has adopted targets in line with the State Requirements (General Plan Policy 8.3.1 and Sustainable Beaumont/Climate Action Plan ("CAP")). Roughly a billion square feet of the Inland Empire is devoted to warehouses.[18] The Project serves to increase cumulative GHG emissions by building even more warehousing, but it fails to adopt all feasible mitigation for the cumulatively significant impact.

The Project will result in total GHG emissions of 63,911.07 MTCO2e/year. This vastly exceeds the adopted threshold of significance of 3,000 MTCO2e/year. As such the Project must adopt all feasible mitigation. Air quality mitigation measures listed above (including the phase-in of zero emission trucks) should be considered feasible mitigation for GHG impacts. Many of the Project's "sustainability features" are already requirements of Title 24/CalGreen, as such they cannot be considered "mitigation"; and they do not address mobile emissions, which are the greatest source of the Project's GHG emissions. For instance, the Project does not provide bike paths and the site will not be served by public transit. Accessible and safe bike paths as well as access to public transit should be considered feasible mitigation for significant GHG emissions related to mobile emissions.

Moreover, under Table 4.8-5, the Project has significant conflicts with the City's CAP and other plans adopting for the purposes of reducing GHGs, including, but not limited to:

City of Beaumont CAP

Goal 6: the Project can reduce its heat island effects by using only light-colored concrete in parking areas and roadways preferably "white concrete"; by increasing landscaping in parking areas; and by covering parking areas with solar canopy structures.

Goal 7: the Project has a significant VMT impact; the City should investigate and establish a programmatic VMT reduction fund (see discussion below).

Goal 9: the Project should maximize solar power by committing, through enforceable mitigation measures, to 100% solar power for all aspects of the facility's operations as well as requiring buildings to provide maximize "solar ready" roofs to allow for expansion of solar panels to accommodate future electric vehicle charging (trucks).

Goal 10: the Project patently conflicts with this goal as it does not "decrease GHG emissions from new development"; it vastly *increases* GHG emissions.

[18] https://calmatters.org/commentary/2023/09/inland-empire-warehouse-boom-rejections/

City of Beaumont General Plan

Policy 3.1.12: The Project does not locate "less intensive rural development within proximity to open space areas". It locates an intense warehouse complex with loading docks on both sides of buildings and truck travel lanes adjacent to open space conservation areas. The Project also includes "disturbance *within* areas designated as Open Space." (emphasis added)

Policy 4.1.5: the Project is not "required" to provide a public transit "connection."

Policy 4.4.3: the Project does not "improve safety for all transportation users." There are no bicycle paths and no public transit. The Project is not walkable to homes, and it will require use of personal vehicles by employees and visitors to commercial areas (if built), which is neither equitable nor environmentally sustainable. The same discussion applies to Policy 11.12.6.

County of Riverside CAP

It is not clear that the County of Riverside's CAP Screening Table is relevant to the conclusions of the EIR where the Draft EIR states that consistency with the CAP is shown for "informational purposes." However, to the extent the EIR *relies* on the CAP to determine the level of Project impacts and relies on the CAP Screening Table for purposes of *mitigation*, the Project is not shown to be consistent, including there is *no enforceable* mitigation requirement of photovoltaic power for which the Project claims 19 points under the Screening Table. Many of the Screening Table measures are already requirements of Title 24 (*e.g.*, bike lockers) thus claiming them as "mitigation" is inappropriate particularly where the EIR already reduces GHG emissions by 30% due to compliance with Title 24. The Project incredibly takes "480" points under the Screening Table for installing EV charging stations (the EIR notes that the Project "is anticipated to include 60 EV charging stations"; yet elsewhere the EIR states "15 electric vehicle charging stations"). In either case, the EV chargers are <u>not</u> part of the CEQA mitigation program. The Project further takes 3 points for providing bike lockers but there are no bike paths as part of the Project so that bicycle lockers do not seem to have a practical application. The Project is uphill and not a reasonable walking distance from any existing residential area.

SCAG 2020-2045 RTC/SCS

Goal 5: the Project does not reduce GHG emissions and improve air quality; it causes significant GHG emissions and significant air quality impacts.

Goal 10: the Project develops natural lands and replaces it with warehouse development bringing vehicles, big rig trucks, lighting, and noise ("urban development)" to a natural, undeveloped area adjacent to MSHCP Conservation Areas. Moreover, the Project is not located within "the City of Beaumont"; it is located in Riverside County in an area designated for conservation under the MSHCP.

Overall, the Project does not decrease VMT (it vastly increases VMT) and therefore is not consistent with plans and polices aimed at reducing VMT to reduce GHG emissions in southern California. In terms of proximity to the regional transportation network, access to the Project site is via 4th Street and local roadways including Portero Boulevard. Trucks and vehicles will must traverse local roadways to reach the Project site; the site is not accessible from SR-60.

County of Riverside General Plan

LU 2.1 (f): the Project does not incorporate "multi-modal transportation opportunities" in

that there are no bike paths and no public transit accommodations or access. The site is not within walking distance of anywhere.

LU 2.1 (g): the Project will be built in an environmentally sensitive, high risk fire zone.

LU 4.1: the Project has no requirement of solar energy; the site has no bicycle routes. Generally speaking the site is located far away from any other developed areas and therefore necessitates vehicle use.

LU 8.12: there is no requirement of local hiring so it is unclear that the Project would create a substantial number of jobs "that would be filled by residents of the City and surrounding communities" as claimed. Elsewhere in the EIR it is stated that warehouse distribution/e-commerce facilities are becoming increasingly automated.

LU 11.4: the Project does not provide bicycle paths or public transit. The fact that "sidewalks" will be provided is the minimum requirement to meet accessibility standards under Title 24.

LU 11.5: the Project does not "ensure that all new developments reduce [GHG] emissions". The Project vastly increases GHG emissions.

OS 16.8: the Project does not provide access to public transit. The inclusion of bicycle racks is already a requirement of Title 24. The Project must go beyond existing regulations to increase sustainability measures. The Project must include bicycle paths to encourage the use of bicycles as an alternate mode of transportation. This would include the use of "e-bikes."

OS 16.9: the Draft EIR does not include mitigation to provide within Project buildings "passive, solar design and day-lighting" such as sky lights. Sky lights should be required in all warehouse buildings particularly in employee areas to reduce the need for overhead lighting and provide enhanced working conditions for employees.

Overall, the Project does not reduce VMT and therefore is inconsistent with policies and goals related to reducing vehicle dependency. Among other things the Project does not provide bike lanes or access to public transit. The Project is primarily a warehouse complex located on a steep hillside on the south side of SR-60, and it is not located within walking distance from any residential or commercial areas.

Furthermore, MM 4.8-1 is inadequate under CEQA. It states that the Project will implement the measures of Table 4.8-6 but may also "achieve equivalent reductions from other measures approved by the City." This does not amount to certain and enforceable mitigation under CEQA in part because performance standards are not specified and these "other measures" will be formulated after Project approval. Moreover, the City will only "verify" the measures "prior to the issuance of the final Certificate of Occupancy," which may never occur, since there is no guarantee that all phases of the Project will be developed (including the commercial phase/Phase 3). Additionally, Table 4.8-10 asserts the Project will include a requirement to offset 60% of energy demand via photovoltaic solar but this is neither specified in the GHG Screening Table analysis or in the mitigation program. Again the City should also consider additional measures aimed at reducing VMT including *programmatic* VMT mitigation (see below).

Energy Demand

State CEQA Guidelines Appendix F provides that "[t]he goal of conserving energy implies

the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) *decreasing* reliance on fossil fuels such as coal, natural gas and oil, and (3) *increasing* reliance on renewable energy sources." (emphasis added) Appendix F puts "particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." The EIR's finding of less than significant with respect to energy resources is not supported.

The Project will consume 53,857,582 kBTU of natural gas, 25,747,206 kWh of electricity, and 5,318,792 gallons of fuel annually. The Draft EIR concludes that impacts are less than significant because the Project represents a small percentage of energy consumption compared to State-wide energy usage and fuel demand. Accordingly the Project does not adopt any energy mitigation measures.

The Project creates a massive demand for electricity, but does not, for instance, "increase reliance on renewable energy sources." (*See* CEQA Guidelines Appendix F.) This Project must mitigate its energy impacts. The installation and utilization of a solar energy system for 100% of the facility's total energy demands including all electric vehicle charging could vastly reduce the Project's energy impacts consistent with Guidelines Appendix F. The City must impose measures on the Project to ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100 which commits to 100% clean energy in California by 2045. The Draft EIR indicates that the Project will rely on renewables for 20% of the Project's energy demands but this is not part of the CEQA mitigation program and it is unclear how this measure will be implemented. Flat-roofed warehouse buildings must maximize their reliance on solar power including maximizing solar readiness for future expansion of PV panels to meet additional energy needs (charging of electric trucks).

The Project should be required to adopt further measures to reduce Vehicle Miles Traveled ("VMT") to reduce fuel consumption. The Draft EIR reasons that VMT will be reduced because at full buildout the Project is anticipated to employ approximately 5,000 persons. There is no requirement of local hiring so that assumptions that employees will travel shorter distances to work are not based in fact, and all employees will be dependent on cars as the uphill site is not within reasonable walking distance of any residences or a transit stop. The Project increases VMT and is therefore patently inconsistent with land use plans - local, regional, and State – that aim to reduce VMT. For instance, according to the 2022 CARB Scoping Plan[19],

[19] https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf

> [c]ontrary to popular belief, zero-emission vehicles (ZEV) alone are not enough to solve the climate crisis. The 2022 Scoping Plan illustrates that despite cleaner vehicles and low- carbon fuels, the path to carbon neutrality by 2045 also depends on reducing per capita VMT (the total passenger vehicle miles driven by an average person in California on any given day). To meet the carbon neutrality goal, the Scoping Plan proposes reducing VMT from 24.6 miles per day in 2019 to 18.4 miles by 2030 (a 25 percent reduction) and to 17.2 miles per day by 2045 (a 30 percent reduction).

To reduce VMT consistent with State, regional and local plans, the Project should consider an alternate development scenario involving more mixed-use development balancing professional and business park uses with commercial and warehouse uses. As proposed 94% of the Project's developed space are industrial warehouses. The Project should consider committing to local hiring to reduce VMT. The Project should incorporate safe and accessible bike lanes as well as access to public transit. The City should also explore *programmatic VMT mitigation options*. Other jurisdictions like the City of Escondido are evaluating "VMT Exchange Programs" for instance[20]. *See also* [21] [22].

Finally, mitigation measure 4.3-8 must be revised to require only electric outdoor cargo-handling equipment ("non diesel" includes natural gas/CNG).

Land Use Impacts

Contrary to the conclusions of the Draft EIR, the Project results in significant land use impacts, including, but not limited to, conflicts between the Project and City of Banning General Plan policies as discussed in the GHG section above. The Project also conflicts with General Plan Policies 3.4.8, Policy 3.11.9, Policy 3.12.2, Policy 3.12.3, Policy 3.12.4, Policy 4.1.5, Policy 4.6.2, Policy 8.5.1, Policy 8.6.1, Policy 8.9.2, Policy 8.9.3, 8.9.4, Policy 8.10.4, and Policy 10.1.5 as well as General Plan policies related to noise.

The Project is also inconsistent with Riverside County General Plan Policies, including LU 7.7 in that "buffers" are not required between intense industrial uses and watercourse areas including their habitat. The Project does not provide transportation options and bikeways consistent with Policies C 1.2 and C 1.7. In terms of biological impacts, the EIR does not demonstrate that the Project is consistent with Policy OS 4.9 which "discourage[s] development within watercourses and areas within 100 feet of the outside boundary of riparian vegetation." The record does not demonstrate the Project is consistent with Policy OS 5.5 to "preserve and enhance existing native

---

20 https://www.escondido.org/Data/Sites/1/media/Planning/VMT/EscondidoFeeProgramDocumentation_PublicReviewDraft10212022_clean.pdf

21 https://www.law.berkeley.edu/wp-content/uploads/2018/09/Implementing-SB-743.pdf

22 https://scag.ca.gov/sites/main/files/file-attachments/ladot-vmt-mitigation-program-factsheet.pdf?1643075436

riparian habitat." The Project is patently inconsistent with Policies OS 11.1, 11.,2, 11.3 and 16.9 regarding solar energy systems.

The Project is also inconsistent with plans and policies aimed at reducing VMT. The Project will result in 213,809 vehicle miles traveled per year; the heavy-duty truck VMT is 91,040. The Project will exceed the City's adopted VMT threshold by 45%. (Draft EIR, Appendix K2) The VMT Technical Analysis (Appendix K2) suggests strategies that should be applied to the Project (pp. 6-7) including to "provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities to the east along 4th Street." This was not adopted for the Project. The Draft EIR's transportation section acknowledges that there no transit stops or bicycle facilities *within the Project vicinity*. (DEIR p. 4.17-2.)

The City has apparently an approved *Policy on Land Use and Sensitive Receptors* which is intended to minimize the effects of warehouses in close proximity to sensitive receptors. This policy includes requirements such as that dock doors shall not be visible from surrounding residential properties; truck bays shall be a minimum of 1,000 feet from the property line of a nearest sensitive receptor; projects shall be designed to ensure adequate on-site queuing; truck driveways shall not front sensitive receptors; that a truck route should be submitted as part of the entitlement package; separate entry and exit points for trucks and passenger vehicles shall be provided to minimize vehicle/truck conflict; pad heights should be varied to provide visual dimension and reduce visible height of a structure; external PA systems are prohibited; wayfinding signage should be posted; a community benefit program shall be funded. (*See* **Attachment B** hereto)[23]. The Project has not evaluated in accordance with this Policy and the Project represents significant conflicts with this Policy.

The EIR must be revised in terms of conflicts with General Plan and other land use policies applicable to the Project. Additional mitigation must be imposed to ensure consistency between the Project and adopted land use plans.

Noise

Construction noise is significant contrary to the EIR's conclusions. The Draft EIR Table 4.13-7 claims a 20 dBA "typical building construction" noise reduction but does not explain why this substantial reduction noise is credited. The Draft EIR's Noise Study (Appendix J) indicates that this 20 dBA reduction is applied "for typical buildings with 'windows closed'," meaning, apparently, that the analysis assumes all residences in the vicinity of the Project site will not experience significant noise impacts because they will have their windows closed Monday through Saturday during the five-year construction period. This raw assumption does not account for homes without air conditioning (in summer months), nor does not account for the fact that people use exterior spaces of their homes (backyards). Nor does it account for the fact that wildlife will experience *unabated* noise during the Project's five-year construction period. Noise has harmful

[23] https://www.beaumontca.gov/DocumentCenter/View/37935/Final-PLUS

effects on wildlife species (see above). The analysis (Table 10-2) indicates significant impacts at "BIO" receivers during construction in particular as to BIO-3 (164 feed southwest of the Project site opposite the planned loading dock area of Building 4). Moreover, all construction noise levels exceed the residential noise standards applicable to the Conserved Area. Noise is very harmful to animal species.[24]

Furthermore, the construction noise analysis apparently does not measure or account for *off-site* construction activities including the extension of 4th Street or encroachments into the Open Space areas that are described in the Draft EIR including the construction of the "manufactured slopes" in these areas (*see* Appendix J, Noise Study Exhibit 10-A). The Project Description notes that off-site improvements include the installation of water, recycled water, and sewer lines, which would occur up to 350 feet east of the Project site in the 4th Street right of way. These activities are not captured by the construction noise analysis in terms of receiver locations. Finally, the construction noise analysis does not account for periods where construction will overlap with Project operations, meaning that noise events will be occurring simultaneously.

In terms of operational noise impacts, "loading dock" activity has a referenced noise level of 65.7 dBA at 50 feet according to the EIR. (Appendix J, p. 57). At 164 feet, BIO 3 can be expected to experience significant noise conditions particularly at nighttime. Indeed, the noise study indicates a significant impact at nighttime with respect to BIO-2 and BIO-3 (46.2 dBA and 50.2 dbA respectively.) This is a significant and unmitigated impact of the Project. Also, there were apparently no "ambient noise levels" taken for the BIO receivers meaning that the Draft EIR does not measure or disclose the *increase in noise* with respect to the conservation area to the south (*see* Tables 9-5 and 9-6).

The City must adopt all feasible mitigation measures for significant noise impacts. For impacts to the conservation area, this includes relocating, shrinking or clustering buildings to allow for more buffering between noise sources and sensitive biological receptors, installing noise absorbing walls, limiting nighttime activities including truck deliveries, prohibiting "PA" systems especially at night, prohibiting the use of generators except in case of emergency, ensuring a daytime schedule for trash compaction and collection, and ensuring lights are dimmed off to the maximum amount or turned off when not in use. (*See* Attorney General *Warehouse Best Practices* "Warehouse Siting and Design Considerations.")[25] *Thousands* of trucks per day are anticipated to arrive at the Project site on a 24 basis, utilizing travel lanes in and around the Project site adjacent to the conserved lands.

For significant traffic noise impacts, again site design measures including reducing the size or number of buildings to reduce the amount of truck traffic is feasible mitigation. Additionally, limiting the hours of operation/deliveries/loading dock activities to daytime hours is another feasible and reasonable means to reduce significant nighttime traffic noise impacts.

---

[24] https://www.nature.org/content/dam/tnc/nature/en/documents/Shale_Practices_Noise_Control.pdf
[25] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

The Draft EIR proposes only *one* noise mitigation measure for significant, long-term noise impacts due to intense industrial operations including significant truck traffic on local roadways. Sierra Club submits that numerous measures are available to reduce noise at the Project site due to Project operations including, for instance, paving roads with low noise asphalt (*see, id.,* p. 9; *see also*[26], [27]). Due to the porous nature of asphalt, this material can reduce roadway noise by 3 dBA to 5 dBA[28] (the Draft EIR dismisses this measure). Also for instance, loading docks can be designed with noise attenuating features such as a foam seal and enhanced bumpers on the deck leveler to reduce "dock mating noise." Ensuring a tight connection between the truck and the building will ensure that all unloading is done directly in the building. Again for instance, a completely roofed loading dock and roll up doors that are closed during trailer unloading would reduce nighttime noise if loading activities are permitted at nighttime. In terms of on-site equipment, all cargo moving equipment shall be installed with self-adjusting "back up" beepers that adapt to the noise environment.[29] [30]

Transportation

Project related traffic will use SR 60 and I-10 in route to/from the Project site via Portero Boulevard and 4th Street. The Draft EIR does not disclose that Project related traffic will contribute to cumulatively significant traffic impacts thereby requiring mitigation, and in fact, no traffic mitigation is required through the CEQA mitigation program. The Traffic Impact Analysis (Appendix K1), however, states:

> 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 cumulative traffic analysis scenarios. As such, the Project Applicant's responsibility for the Project's contributions towards deficient off-site intersections is fulfilled through payment of fair share and/or payment into pre-existing fee programs (if applicable) that would be assigned to the future construction of the identified recommended improvements. The Project Applicant would be required to pay requisite fees and/or fair share contributions consistent with the City's requirements (see Section 10 *Local and Regional Funding Mechanisms*). (*See also* Table 1-4.)

---

[26] https://www.petronaftco.com/asphalt-reduces-noise/
[27] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/quieter-pavement-a11y.pdf
[28] https://www.sunlandasphalt.com/can-we-reduce-road-noise-by-selecting-a-certain-pavement-type/
[29] https://www.cpwrconstructionsolutions.org/heavy_equipment/solution/792/self-adjusting-and-directional-backup-alarms.html#:~:text=Self%2Dadjusting%20and%20directional%20backup%20alarms%20are%20an%20engineering%20control,the%20vicinity%20of%20the%20vehicle.
[30] https://www.forkliftamerica.com/forklift-backup-alarms/

This is a significant cumulative impact contrary to the conclusions of the Draft EIR. (DEIR p. 4-17.21.) The City must find the impact to be significant. The EIR indicates that a number of intersections will operate at unacceptable levels of service. (See Draft EIR Exhibit 5-7, 5-8, and 5-9.) The EIR indicates a number of needed improvements. (*See* Draft EIR section 5.7.1) The Project is not conditioned to make any fair share payments for needed traffic improvements.

The traffic model assumes that 25% of Project related vehicle traffic will use Portero Boulevard between 4th Street and Oak Valley Parkway thereby passing by existing residences to the west of Portero Boulevard. This is not disclosed in the Draft EIR. The traffic model assumes *no* truck traffic on this same roadway segment although there is nothing preventing or restricting trucks from using this roadway segment for access to I-10. The Project must establish a "Truck Route" to ensure that Project related truck traffic does not use Portero Boulevard north of the "new" interchange to reach I-10. If trucks use this segment of Portero Boulevard they will pass homes/sensitive receptors. The EIR states that the Project is not "anticipated" to use the Beaumont Avenue and I-10 off ramps but there is no designated and enforceable truck route that would prevent trucks from using this off ramp. On the other hand, the analysis appears to assume that Portero Boulevard and I-10 ramps will be utilized by Project trucks. (*See* Table 4.17-3.)

Contrary to the EIR's conclusions, the Project conflicts with General Plan policies related to transportation including Policies 4.1.5, 4.2.2, 4.2.5, 4.4.3, where there is no public transit available at the Project site and the Project proposes none.

In short, the Draft EIR's conclusion that the Project does not result in cumulatively significant traffic impacts is not supported. Table 4.17.3 indicates that the Project results in cumulatively significant impacts to the studied intersections. Therefore mitigation is required.

Wildfire Evacuation

The Project site is in a "Very High Fire Hazard Zone." The Project is designed so that the entirety of the development will rely on 4th Street and an emergency access point for vehicle ingress/egress points. The location of the Project, the design of the Project, and the intensity of development including the commercial component/hotel raises serious issues of fire safety and evacuation risk.

First, the Draft EIR does not demonstrate that fire response times can be met (the City's goal is five minutes, *see* General Plan Update p. 226[31]). The Fire Protection Plan indicates that the closest fire stations are 6.94 and 9.15 minutes from the entrance to the Project site (not the farthest point of the development). (FPP p. 35.) Both are staffed with a single fire engine. Riverside County has also recommended a 5 minute response time (90% of the time) for land uses such as large industrial complexes under the category of "heavy urban". (FPP p. 36.) There is no indication in the record that the Project can meet this 5 minute response time due to its more remote and hillside

[31] https://www.beaumontca.gov/DocumentCenter/View/36923/Beaumont-GPU_Final-rev-22521

location.

The Draft EIR also does not demonstrate that the Project site can be safely evacuated during a fast-moving major fire event. In addition to visitors to the commercial businesses, including the 125-room hotel, the Project is expected to employee roughly 5,500 people. The EIR must demonstrate that the number of persons occupying the Project site at any given time can evacuate in a safe and efficient manner including via 4th Street, that is, whether the capacity of 4th St. can handle the mass evacuation of the site; also the record does not indicate whether nearby roadways (Portero Road) can accommodate evacuating persons including residents of existing neighborhoods and employees and visitors of nearby warehouses assuming 4th Street through to SR 60 is blocked by fire. The Project depends on local roadways for connections to SR 60 which are likely not capable of handling the mass evacuation of the site (the Project apparently only improves 350 feet along 4th Street).

The Draft EIR's Evacuation Study (Appendix M2) indicates that under "Scenario 3" (4th Street) the Project will take approximately 2.5 hours to evacuate, and in combination with the "Hidden Valley Industrial Park" to the west, will take more than 3 hours to evacuate. This must represent a significant impact of the Project in terms of the need for additional fire protection services. The Project's mitigation program does not include mitigation for wildland fire risk impacts.

The Beaumont General Plan requires the preparation of a fire protection and evacuation plan and requires that new development provide two viable points of ingress and egress for emergency vehicles. The General Plan has other policies intended to mitigate fire risk which are not met here. (*See* General Plan Goals 9.4, 9.5, 9.6.) This includes Policy 9.5.2 stating that fire department resources shall be increased to meet the targeted response time of five minutes. Even with the construction of a new fire station as indicated in the Final EIR there is not evidence that fire response time of 5 minutes can be met for the Project. This new fire station was not evaluated through the Draft EIR and there is not evidence in the record that this new fire station will meet fire response times. Nor does the Project appropriately consider the Amazon facilities located on 4th Street.

Finally, the Fire Protection Plan must be made a mitigation requirement of the Project through the CEQA mitigation program. We could not locate the FPP in the conditions of approval or the mitigation program.

Cumulative Impacts

As noted above, a billion square feet of the Inland Empire is devoted to warehouses. In just a few months, the World Logistics Center (WLC) - the 40 million square foot warehouse complex in eastern Moreno Valley - will break ground. The WLC is located only a few miles from the Project site. The WLC is estimated to generate 12,000 daily diesel truck trips with most of them using SR-60 —traveling past the Project. It is also estimated to generate more than 50,000 daily vehicle trips.

The WLC Project has not been included in the Project's cumulative impact analysis. Because the Project will contribute to traffic impacts on SR-60, the cumulative impact analysis must be updated to include forthcoming the WLC Project. (*See attached; see also*, **Attachment C** hereto [map of warehouse development in Inland Empire indicating WLC].)

Growth Inducement

Based on the Project's development pattern and expansion of infrastructure, including roadways and utilities, and given the site's proximity to undeveloped rural residential lands, the Project presents the potential for growth inducing impacts contrary to the EIR's findings. (Guidelines, § 15126 (d).)

Project Alternatives and Findings of Fact

CEQA requires that an EIR 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 and would avoid or substantially lessen any of the significant effects of the project." (Guidelines, § 15126.6 (a).) The "range of alternatives" presented through the EIR do not provide decisionmakers with meaningful alternatives that substantially reduce project impacts and meet most of the basic objectives of the Project. The Reduced Intensity Alternative would still develop 4,000,000 square feet of industrial uses (a total of 4,495,000 sf of industrial development). It would primarily decrease the amount of commercial uses under the Project.

The Draft EIR should evaluate a development alternative with a greater mix of uses, such as business park or professional park uses, to reduce VMT and noise (due to heavy duty truck traffic). Specific plan zoning is an opportunity to create a comprehensive zoning plan for a particular area; and because the Project proposes to entirely redesignate and rezone the properties it is not a foregone conclusion that only industrial uses (with some limited commercial) must be developed. The City should explore a development that truly balances uses to create the type of "transit oriented" development that reduces VMT. The City should also consider an alternative that substantially reduces the amount of industrial development as this is the "primary" development objective of the Project. By reducing industrial development in a meaningful way there is a real opportunity to reduce Project impacts while still providing employment and tax revenue opportunities.

To ensure that alternatives are properly assessed and considered, CEQA "contains a `substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are feasible alternatives or mitigation measures' that can substantially lessen or avoid those effects'." (*County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 98; Pub. Res. Code § 21002.) A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. (Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092.) Rejected alternatives must be "truly infeasible." (*County of*

Marina v. Bd of Trustees of Calif. State Univ. (2006) 39 Cal.4th 341, 369.) Absent findings of infeasibility supported by substantial evidence, the City here must adopt the Reduced Intensity Alternative. The Findings do not demonstrate that this alternative is infeasible. The purported fact that fewer jobs would be created and that the alternative would not meet Project Objectives C, D, and E "to the same extent" as the Project is not a finding of infeasibility of the alternative.

Conclusion

For the reasons above, Sierra Club urges the Council to delay a decision on this Project pending revisions to and recirculation of the EIR as well as the adoption of further mitigation. Thank you for the opportunity to comment on this Project.

Sincerely,

Abigail Smith

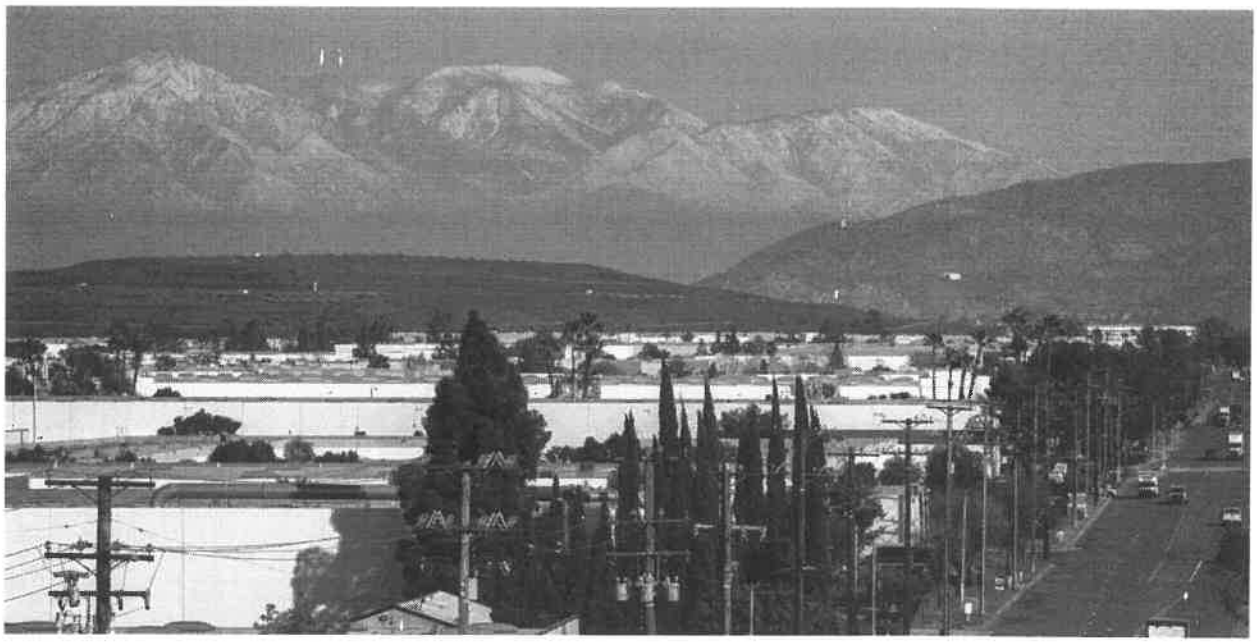
Abigail Smith

Enclosure

ENVIRONMENT

Ontario still 'warehouse king' in Inland Empire

Large project propels Moreno Valley to No. 2 on consultant's list of most impacted areas



Traffic flows on Philadelphia Street near warehouses in Ontario last week. An environmental consultant's data shows the region is becoming more saturated with warehouses.

Image 1 of 2 ›

By Jeff Horseman

jhorseman@scng.com

It's easy in the Inland Empire to feel surrounded by warehouses. But where is the logistics footprint the largest?

Mike McCarthy thinks he knows. Using publicly available data, including information from county assessors' offices, the Riverside environmental consultant recently updated his list of the Inland communities with the most square footage devoted to existing and planned warehouses.

The rankings help residents hold accountable the elected officials who make land-use decisions allowing warehouses, McCarthy said.

"Understanding which cities are disproportionately impacted is helpful for local residents to understand where they fit," he said.

McCarthy's rankings, updated from his first list in 2022, paint a picture of a region increasingly saturated with large warehouses, often 1 million square feet or larger.

Thanks to its nexus of freeways and rail lines, proximity to the ports of Los Angeles and Long Beach, an abundance of flat, cheap, available land and a blue-collar workforce, the Inland Empire is a logistics hub supplying Southern California and a nation thirsty for instant delivery of online-ordered goods.

While warehouses employ thousands and provide an economic foundation in a region lacking the high-paying, white-collar jobs of coastal counties, some also blame logistics for a range of health problems associated with toxic

exhaust belched by warehouse-bound trucks.

Critics also assail the logistics industry for destroying local roads with a seemingly endless stream of tractor trailers and warehouse working conditions described as unsafe and sweltering.

McCarthy, a member of Riverside Neighbors Opposing Warehouses, said he made two changes from his 2022 rankings. He included warehouses that have been planned and approved but not yet built. And he added unincorporated communities that aren't officially part of a city.

Ontario, which was No. 1 in 2022, remains at the top of McCarthy's list.

"Ontario is still the warehouse king of the Inland Empire," McCarthy said.

Moreno Valley, which ranked No. 11 two years ago, is now second.

The biggest factor in Moreno Valley's jump, McCarthy said, is the World Logistics Center, which will feature 40.6 million square feet of warehouse space on 2,610 acres — roughly equal to 700 football fields — once completed.

About 2.6 million square feet of the center has been built and occupied, Eric Rose, spokesperson for the center's developer, Highland Fairview, said via email. Engineering for the next phase of infrastructure is done, with construction expected to start as early as April, he added.

Moreno Valley Mayor Ulises Cabrera said via a text message that, while logistics brings an "economic uplift" to the city, "we must address its impacts on air quality, wages, benefits, and infrastructure strain, particularly affecting our most vulnerable communities."

The city also needs to "pivot" to industries such as "technology, the renewable energy supply chain, manufacturing, artificial intelligence, and health care," Cabrera said.

"This balanced approach aims not only to enhance our economic landscape," Cabrera said, "but also to ensure a higher quality of life, offering residents opportunities that extend beyond living paycheck to paycheck."

Fontana is third on the list. Land controlled by the March Joint Powers Authority, Perris, Rialto, Chino, Jurupa Valley, Beaumont and Rancho

Cucamonga round out the top 10.

One new entry to the top 20 is Menifee, which was not previously ranked. McCarthy said Menifee makes the latest list because "there's just a lot of planned activity going along on (the city's) border with Perris on Ethanac Road."

Redlands did not make the top 20 list.

Some cities rank lower on the list than they did in 2022.

Chino dropped to No. 7 from No. 4, Riverside dropped from 10 to 13, Corona dropped from 12 to 16 and Colton dropped from 15 to 18.

"The biggest trend that I'm seeing is just the continuation of logistics sprawl," McCarthy said. "The cities that are the hotbeds for new activity for the planned warehouses are farther from the ports. We're talking about Moreno Valley, Beaumont, Mead Valley, Temescal Valley (and) Menifee. Those are all 80 to 100 miles from the ports."

McCarthy said he was "a little surprised" to see the biggest changes on his list occurring in Riverside County.

"I don't know if that's just because the San Bernardino County cities are more built out," he said. "But almost all of the big changes happened in Riverside on my list."

The list is sobering to Ana Gonzalez, executive director of the Jurupa Valley-based Center for Community Action and Environmental Justice.

"We feel kind of heartbroken" because the list includes cities where the center has been working with residents to mobilize against warehouse growth, Gonzalez said.

The list also includes communities that are heavily Black and Latino, Gonzalez added. "We just see this perpetration of environmental racism in our communities."

Gonzalez said the list underscores the need for the state government to intervene to stem the tide of logistics development. Politico reported last month that Assembly Speaker Robert Rivas, D-Hollister, asked lawmakers to form a "warehouse working group" to rein in the problems associated with

warenouses in a way that doesn't kill warenouse jobs.

Attachment A

AMPING UP: CHARGING INFRASTRUCTURE FOR ELECTRIC TRUCKS

Widespread innovation and technological advances are producing technologies and practices that could affect decisive, revolutionary, and potentially disruptive opportunities across the transportation industry. As novel concepts, new applications, and original modes of behavior reach the market, fleets and manufacturers need information on the benefits, challenges, and risks so that everyone can profit in this evolving landscape. The North American Council for Freight Efficiency (NACFE) hopes that by fleet managers, manufacturers, and others using its Guidance Reports in the months and years leading to launch, the first generation of production technologies will perform much better and offer higher return on investments.

This report focuses on charging infrastructure considerations for North American commercial battery electric vehicles (CBEVs). In its previous Guidance Reports, *Electric Trucks—Where They Make Sense* and *Medium Duty Electric Trucks—Cost of Ownership*, NACFE found that while the benefits of electric vehicles can be huge, so are the power requirements for charging them. In fact, the previous reports identified charging infrastructure as one of the largest unknowns and sources of anxiety for fleets considering near-term adoption of this technology. NACFE created this Guidance Report to provide unbiased information detailing the multiple factors to consider in infrastructure planning for charging CBEVs. While there

is no "one size fits all" solution to charging, there are common steps and considerations that any fleet considering deployment of electric trucks should undertake in order to ensure they have a complementary and cost-effective charging strategy in place.

This is the third in a series of NACFE guidance reports on electric trucks. It will be followed by Guidance Reports on Class 7 and 8 day cabs and Class 8 long-haul electric vehicles. The goals of this guidance report are to: a) give an overview of electric vehicle supply equipment (EVSE); b) provide information on procuring charging stations and the required electricity; and c) provide common steps and considerations to ensure a complementary and cost-effective charging strategy.

METHODOLOGIES

NACFE's research for this report included interviewing key people with first-hand knowledge of electric vehicle charging infrastructure at fleets, manufacturers, suppliers, utilities, and industry groups. The report includes an extensive list of references to assist readers interested in pursuing more detail. Interviewees were specifically asked what they would want to see in this report and NACFE has taken care to include these wants in the final report. This report builds off the NACFE Guidance Reports: *Electric Trucks—Where They Make Sense*, published in May 2108, and *Medium Duty Electric Trucks—Cost of Ownership*, published October 2018.

SCOPE OF THIS REPORT

The report covers charging considerations for CBEVs currently in production for freight delivery. Because most CBEVs are currently being deployed in the goods movement sector in the medium-duty urban delivery and drayage sectors, much of the best practices and lessons learned come from these applications. And while we touch on considerations for long-haul CBEVs, much of this information is speculative at this point in time as electric trucks have yet to be deployed for this application in any meaningful way.

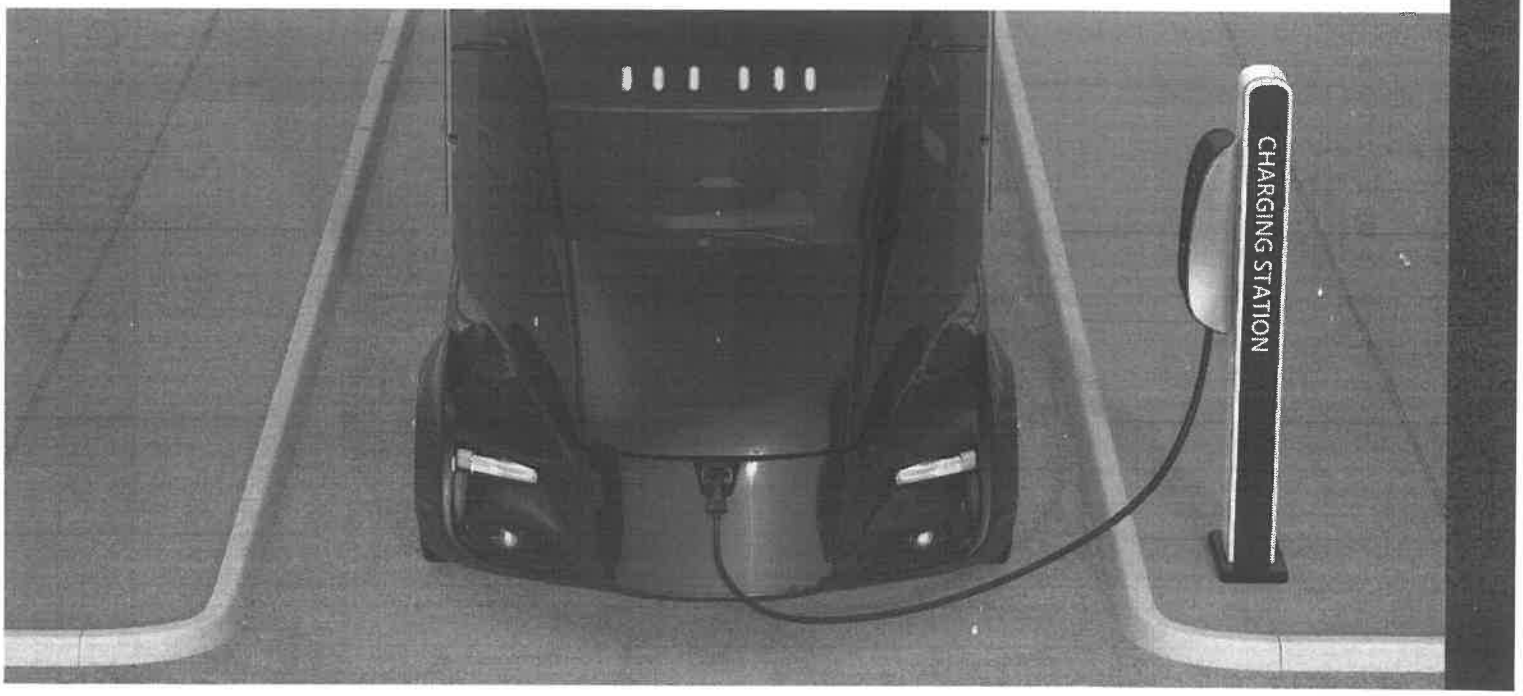
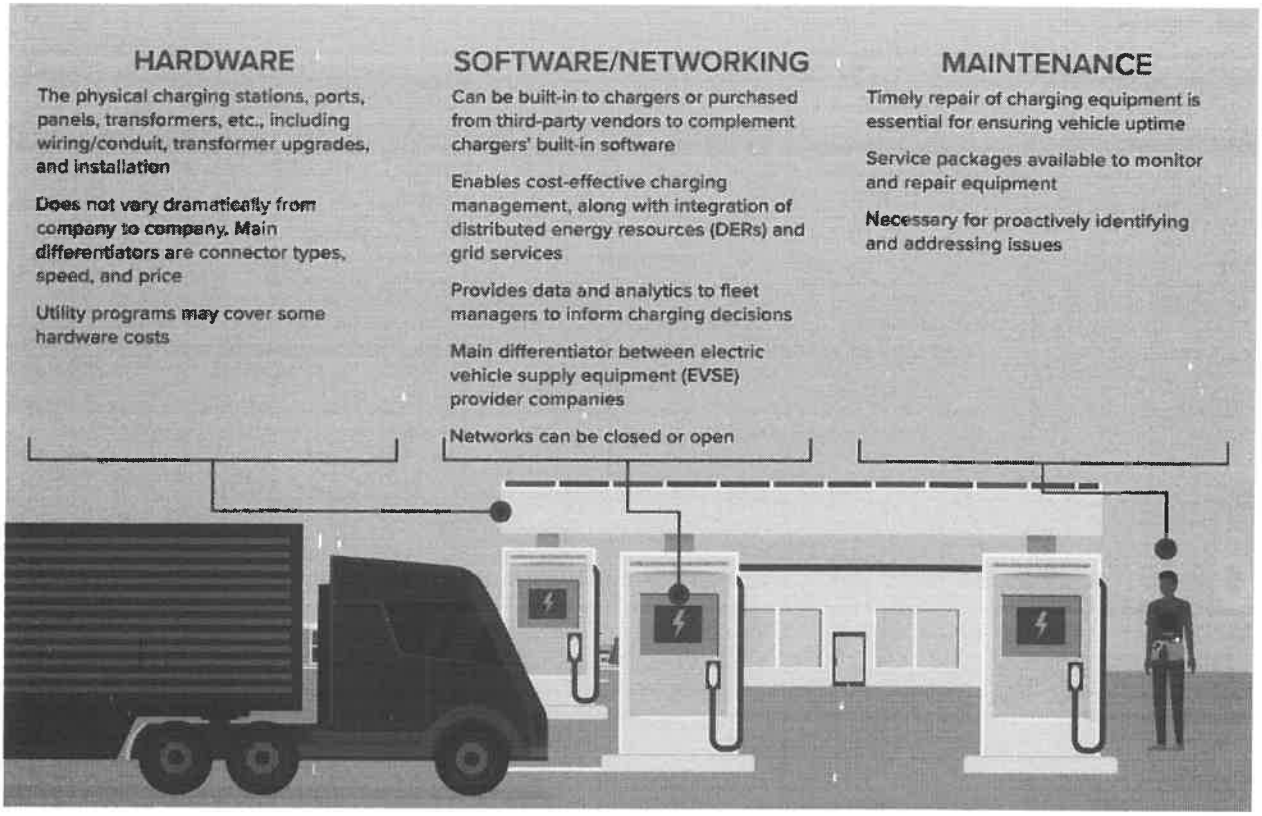


FIGURE ES1
ELECTRIC TRUCK CHARGING INFRASTRUCTURE COMPONENTS



INFRASTRUCTURE BASICS

ELECTRIC VEHICLE SUPPLY EQUIPMENT

When planning for charging infrastructure, fleets must plan for three separate but related components: hardware, software/networking, and maintenance.

The hardware consists of the electric vehicle supply equipment (EVSE), also known as a charging station, which charges the batteries of electric vehicles. The most common type of EVSE is a plug-in charging station, which plugs into a port on the truck to recharge it. Unfortunately, charging station connecters are not yet standardized, and there are a number of competing charging station connector types throughout the world (e.g., SAE J1772, CCS, CHAdeMO, Tesla, etc.).

It is important to pair electric trucks with the appropriate type of connector. However, standardizing connectors may eventually occur for regional marketplaces as one configuration wins significant market share advantage over others. In the near term, commercial vehicles may be developed with several adapters to deal with various charging station constraints or forced to use proprietary connections and be limited to proprietary charging stations. Similarly, some charging stations offer multiple connector types to ensure usability across different vehicles. The connector choice may not be an issue for fleets with only one CBEV model and with dedicated A-B-A type routes where the vehicle only charges from its home base. However, if a fleet is using competing CBEV models from different manufacturers but wanting to use the same charging system, there may be need for adapters. Thus, for fleets that choose their vehicles first, they will need to know what type of port the truck has in order to plan which charger type(s) to purchase.

An alternative to charging through wires and plugs is termed wireless power transfer (WPT). Wireless charging protocols are in use with automobiles and some buses. Applicability of wireless charging to trucks is being investigated both in static situations where the vehicle is not moving, and in on-road methods were the vehicle is moving. Although static charging presents the least technical challenge for wireless, currently wireless charging technology appears too expensive for the trucking market, with a few exceptions for niche markets. For example, wireless charging may be an opportunity for heavy-duty trucks to charge while they're waiting to pick up loads from ports. It is also being considered as a solution in port applications where union contracts may prevent workers from physically plugging in charging cables. However, some see a bigger opportunity for wireless charging in the trucking sector.

Other charging options include overhead or in-ground conductive charging systems and battery swapping—rapidly charging vehicles by simply replacing the battery packs.

CHARGING SPEEDS

In regard to charging speed, there are three types of EVSEs: Level 1—a 120 Volt home wall outlet, typically only used for light-duty passenger vehicles; Level 2—a 240 Volt charger; and Level 3—DC Fast Chargers (DCFC).

Since a Level 1 charger is not appropriate for charging commercial fleets, fleets will need to decide between Level 2 or DCFC (or a mix of both) in order to keep their vehicles charged. Level 2 chargers can range from $2,000 to $7,000 and offer upwards of 7.2 kW of power, with some now offering over 19 kW. Depending on duty cycle, many fleets that employ "return to base" or "depot" charging find Level 2 EVSEs adequate for charging overnight or during their "dwell time" between shifts.

However, trucks with larger battery packs and/or shorter dwell times may need to consider DCFCs, which are much faster and also much more expensive. Not including installation or any grid/facility upgrades that may be required, current DCFC stations can cost upwards of $15,000 and as much as $90,000. Deciding which level of charging is right for your fleet depends on how many trucks need to be charged, the size of their batteries, and how long they each have to charge.

FIGURE ES2
TYPES OF EVSE (NACFE)

Type of EVSE	Voltage	Power (kW)	Price	Installation Requirements
Level 1	120 V	1.9 kW	Usually included with vehicle purchase (for passenger EVs)	Most plug-in electric light-duty vehicles come with a cord set capable of plugging into a standard home wall outlet, so no additional charging equipment is required
Level 2	208 - 240 V	7.2 - 19.2 kW	A few thousand dollars per charger	Requires installation of charging equipment and a dedicated circuit of 20 to 100 amps
DC Fast Charge (sometimes called Level 3)	Typically 480 V AC input	72 kW–1 MW (in discussion)	$15,000–$90,000 per charger	Requires installation of charging equipment and dedicated circuit

FIGURE ES3
POTENTIAL REAL-WORLD CHARGING SCENARIOS

Truck	Battery Size	Range	Charge Time with Level 2* **		Charging Time with DCFC* ***	
			To 80%	To 100%	To 80%	To 100%
Chanje V8100	100 kWh	150 miles	3–4 hours	4–6 hours	30–40 minutes	1–2 hours
Freightliner eCascadia	550 kWh	250 miles	17–18 hours	23–26 hours	2.5–3.5 hours	4–6 hours

* Assuming 20% state of charge
** Assuming 19.2 kW
*** Assuming 120 kW from charger and that vehicle capable of receiving 120 kW

For example, as shown in Figure ES3, an electric delivery van may be able to recharge its batteries in 4–6 hours using a Level 2 charger, whereas an electric Class 8 tractor may require the same amount of time to recharge using a DCFC.

Note: The estimates in Figure ES3 assume a 20% starting state of charge for the batteries, that the Level 2 charger delivers 19.2 kW, and that the DCFC delivers 120 kW. It also assumes that both vehicles are capable of receiving 120 kW.

"Fast charging is not really an issue for most medium-duty trucks in the US. Most are one-shift operations with lots of time to charge."

–Don Francis, Clean Cities Georgia

CHARGER COMMUNICATION

In order to ensure proper charging, the charger must know how much power to provide and when. This is accomplished via the EVSE protocol, which, on a basic level, is a two-way communication between the charger and the vehicle. It detects the battery's state of charge (SOC) and sets the correct charging current based on the maximum current the charger can provide as well as the maximum current the vehicle can receive. There's also a safety feature that will prevent current from flowing when the charger is not connected to the vehicle or when there is not proper grounding. EVSE is also capable of detecting hardware faults and disconnecting the power in order to prevent battery damage, electrical shorts, or fire.

The EVSE protocol's ability to understand battery SOC also creates opportunities for smart charging systems to prioritize the order of charging vehicles based on where power is most needed to optimize charging from the fleet's perspective rather than by individual truck. For example, a truck with batteries that are 80% depleted will need more power and therefore more charging time than a truck with batteries that are only depleted 30%. Smartly managing these trade-offs and interactions requires appropriate software.

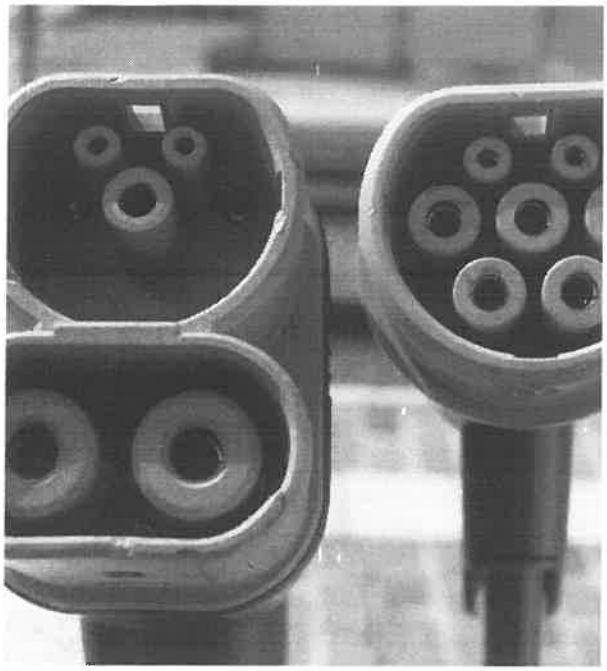


Image courtesy of Wikipedia Commons

CHARGER SOFTWARE AND NETWORKING

Charging software is key for easily and cost-effectively managing fleet charging operations and is now the main differentiator between EVSE provider companies. For example, software is what allows multiple chargers on-site to be able to communicate with one another to optimize sequencing, load management, and variable time of day electricity rates and what ensures that a fleet is charging smartly.

Sometimes, software comes built-in to chargers. Software can also be purchased from third-party vendors to complement the chargers' built-in software. In addition to real-time charging optimization, software is also capable of collecting data and providing analytics to help fleet managers make informed charging decisions.

Most software requires that a charger be connected to a network in order to achieve full functionality. Generally speaking, there are three types of charging station networks: non-networked—typically used in residential applications; closed—which communicate between the charging station and the network server; and open—which allow charging stations to connect to multiple open networks. Particularly when fleets are first dipping their toe into electrification and piloting charging solutions, they may want to opt for open, standards-based networks in case they want to test multiple chargers but manage them all together on one network or in case they want to switch or mix and match chargers in the future.

CHARGER MAINTENANCE

Similar to networking, charging companies may offer very different maintenance packages. These may include services such as proactive monitoring and repair of equipment if needed. Monitoring is important in order to spot and address issues before they snowball into crises. And timely repair of charging equipment is essential for ensuring mission-critical vehicle uptime. Therefore, maintenance packages should be carefully reviewed to ensure they meet fleet needs.

CHARGING LOCATIONS

Charging will roll out in stages, first at a fleets' home depot. Later, fleets may share charging, where a truck goes from its home depot to someone else's home depot, both equipped witn chargers. Eventually, remote public charging is expected to emerge on high density freight corridors where distances demand a mid-trip boost or recharge. Charging will evolve as demand grows.

Similar to the personal vehicle market, most commercial vehicles currently charge at "home," or at private, "depot," or "return-to-base" charging stations. Due to the unpredictable "hub and spoke" nature of commercial trucking operations, most fleets currently adopting electric truck technology will want to place chargers at a central home base such as a warehouse, distribution center, or headquarters where trucks start from and return to each day. This type of "return-to-base charging" also makes sense because fleets have full control over site access, charger type, placement, and timing. This may mean redesigning the site, as the vehicles must be co-located with the chargers for some extended period of time to allow charging.

However, charging vehicles at the fleet's base during dwell times between shifts may not be sufficient for vehicles with larger battery packs and/or longer routes. One potential solution, at least for dedicated regional routes, might be to install charging stations not only at the fleet depot, but also at the customer's site(s). This could allow vehicles with relatively long A-B-A routes to charge at point B while unloading, giving them enough of a charge to make it back to their home base for further charging between shifts.

In addition to depot charging, fleets may also consider "opportunity charging" on the road. For example, vehicles may take advantage of the quickly developing public charging network if needed for range extension or in emergencies. However, because of the costs of using public chargers and the uncertainty of availability, vehicles will likely only want to rely on public charging in case of emergency. But knowing that this option exists should relieve some of the "range anxiety" that fleet managers and drivers may feel about potentially running out of power while away from their home base. Regardless of where charging takes place, fleets that invest in charging infrastructure will want to ensure that station utilization is maximized in order to justify the significant expense.

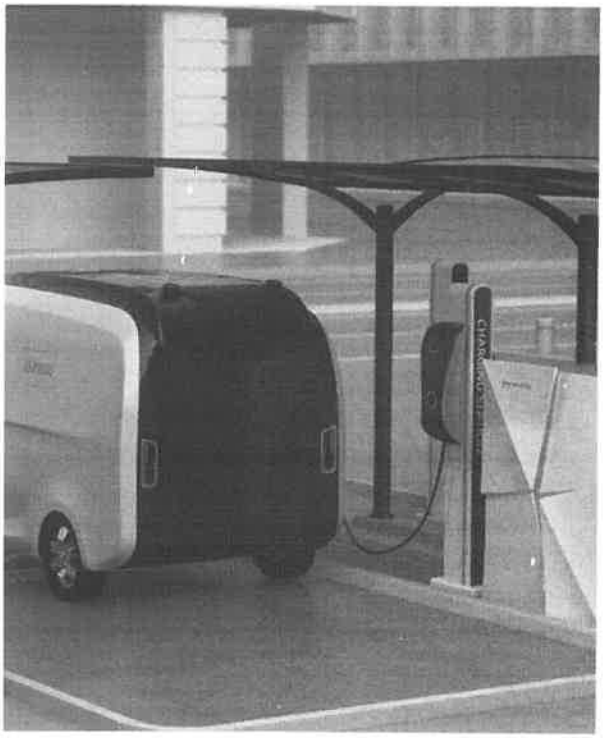
GRID INTEGRATION AND UTILITY BUSINESS MODELS

What is clear, as far as the overall charging system, is that electric trucks will increase demand on electricity. Because of this, grid capacity will need to be improved. New generation may need to be added if increased efficiency in other sectors (buildings, industry, etc.) is not enough to counterbalance the new load from the quickly electrifying transportation sector. Utilities may also need to develop new demand management and/or storage solutions to help balance timing concerns with electricity supply and demand. Similarly, new tariff structures may be necessary in order to encourage smart charging when electricity supply is available, clean, and economical.

Given constraints of the current grid, utilities would prefer that electric vehicles not charge during "peak" times when electricity demand is highest, typically in the late afternoon or early evening when people return home from work and begin doing energy-intensive chores. Rather, utilities are interested in encouraging charging (and other energy-intensive tasks) during "off-peak" hours when the grid has more excess capacity.

The growing demand for electric vehicles combined with state-level greenhouse gas reduction goals and mandates, are causing some utilities to rethink their tariff structures and even to design new tariffs specifically to support EV charging for commercial and industrial customers. This includes implementing time-of-use rates, in which utilities charge a different rate for on-peak versus off-peak times, or demand charges, which allow utilities to charge customers based on their individual peak demand or highest use in a given timeframe. Because of this dynamic, fleets with flexible operations or operations that allow for trucks to be charged at night will likely find charging to be more economical than fleets that may need to charge during the day or all at once to support mission critical operations. However, this dynamic will vary by region and by utility.

Because many utilities earn a profit based on a "cost-of-service" business model that guarantees a "rate of return" on the company's assets or "rate base," utilities are incentivized to build the necessary infrastructure to support transportation electrification, a trend which will likely require them to invest in new assets and therefore earn more profits. With this information in mind, fleets should not be shy in demanding reasonable support and accommodations from utilities to support vehicle charging.



PROCURING CHARGING INFRASTRUCTURE AND ELECTRICITY

There are two main business models for procuring charging stations and associated infrastructure. The most common is by buying the stations outright, often through a request for proposal process. In this scenario, fleets may hire a consultant to help make these decisions and set up the infrastructure (and potentially also help manage the relationship with the utility), but in the end, the fleet owns and manages the chargers, which are then considered a capital expense.

The other way is through leasing in which the supplier owns the stations and the fleet simply pays a fee for using them. This model allows the fleet to pay for the stations out of their operational expense budget. In both the lease and own options, fleets often pay charging suppliers not just for the physical stations but also for access to their fleet management networks, which again, are a recurring operational expense.

Other innovative business arrangements may be possible, including third parties that step in with capital to create turnkey systems, with various usage rates that could remove the site owner from the complexity of managing part or all of the charging system. Those third parties, similar to an energy service provider in the buildings sector, may specialize not just in infrastructure procurement and installation, but also in optimizing charging, which can have large financial implications. Especially for fleets with little experience or interest in optimizing charging, this sort of "charging-as-a-service" model can be a good option since these third-party companies specialize in this area and therefore may be better able to maximize efficiency and avoid load spikes and demand charges.

ELECTRICITY BUSINESS MODELS

Just as there are various ways to procure the charging infrastructure, there are also various ways to procure the electricity. Most fleets procure electricity the traditional way—through the local utility's electric grid. Depending on whether the region is a regulated or deregulated electricity market, fleets may have options with respect to which company they buy their energy from. In thinking through electricity pricing, fleets must be aware of their utility's rates and if and how demand charges are integrated into those rates.

Fleets can also get their electricity from on-site "behind the meter" solutions such as microgrids and renewables like solar PV. However, integrating systems like these into electric fleet charging systems is a very new concept and no data is yet available as far as best practices.

FINANCIAL ASSISTANCE

Fortunately for fleets, depending on the location and project, there are a myriad of financial assistance programs available to help make vehicle electrification more economically feasible. While some of these funding mechanisms are focused more on the vehicles themselves, some can also help cover the cost of charging infrastructure.

Utilities are typically aware of any financial incentives offered within their service territory, so speaking with a utility representative is usually a good place to start. There are also directories available online that allow fleets to search for funding support by location.

IMPLEMENTATION STEPS AND CONSIDERATIONS

Fleets planning for vehicle electrification must consider many variables for implementation. And while each project by necessity involves some bespoke engineering (since each site and project is different), there are some common factors to consider. A suggested chronological roadmap, including key considerations is outlined in Figure ES3.

The roadmap will have the same general steps regardless of number or size of trucks; however, as fleets scale the number of electric vehicles at each site, the charging procurement process will become exponentially more complex and time-consuming.

FIGURE ES4
CHARGING PROCUREMENT ROADMAP

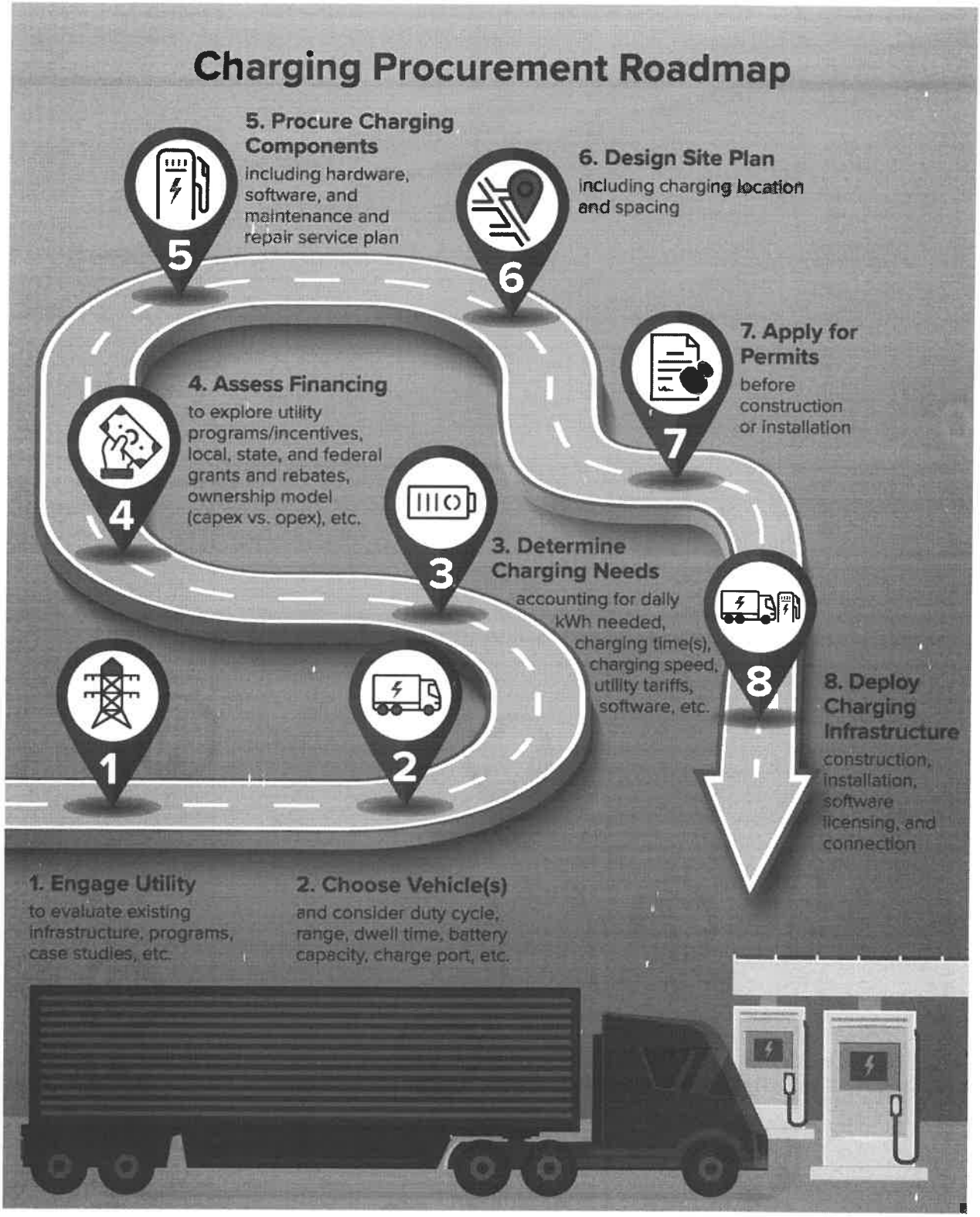
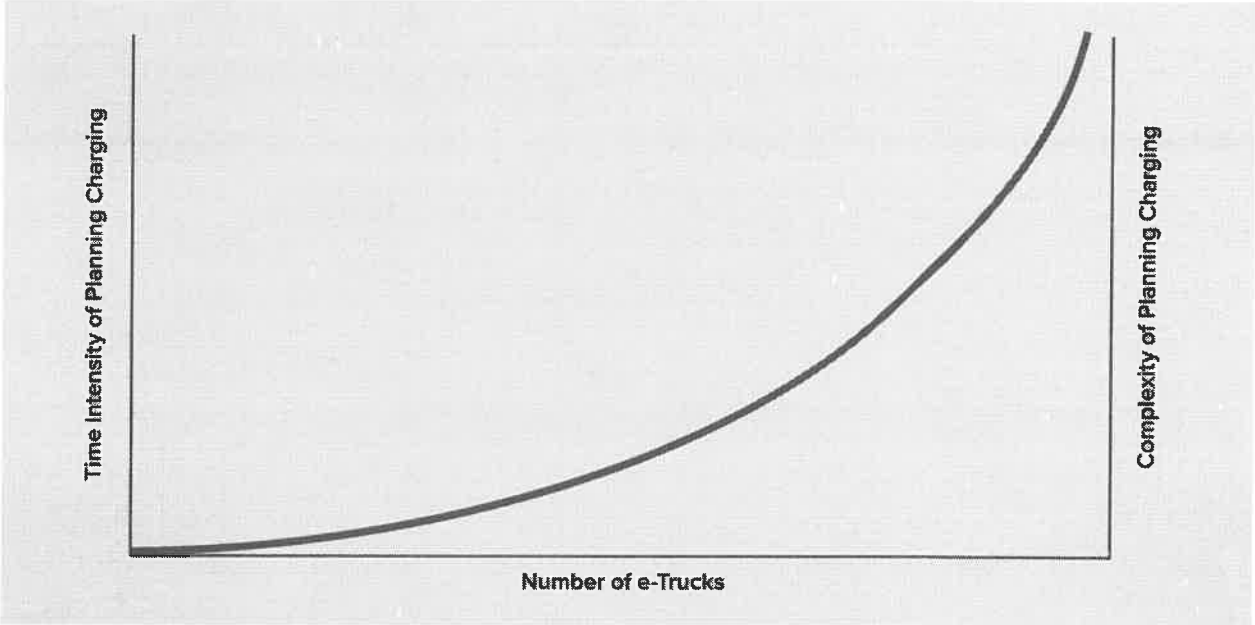


FIGURE ES5
CHARGING IMPLEMENTATION COMPLEXITY



This implementation process may be lengthy, but as more fleets and utilities gain more and more experience, this process will become more streamlined as a common "cookbook" approach evolves.

ADDITIONAL CONSIDERATIONS

In addition to the opportunities and challenges mentioned above, other considerations to take into account when planning for charging infrastructure include employee safety, fueling schedules and operator time requirements, scaling, grid services, integrating renewables, workforce dynamics, ratepayer benefits, and utility business model reform.

"Every charging installation faces a variety of variables—number of trucks to charge, local utility rate tariffs and power delivery structure, existing site and local grid details. There are no rules of thumb."

–Chris Nelder, RMI

Image courtesy of National Renewable Energy Laboratory

CONCLUSION AND RECOMMENDATIONS

NACFE's research into charging infrastructure for commercial battery electric vehicles to date has revealed the following:

- The focus for the foreseeable future of electric truck charging will be on private, "depot," or "return-to-base charging."
- Planning and permitting for charging infrastructure can be a time-intensive process, so fleets should appreciate lead times and start early.
- Fleets planning to electrify some or all of their vehicles should work closely with their local utility, regulators, cities, neighbors, OEMs, and charging system providers.
- Fleets should focus on differentiating products and companies based on their software, network, and maintenance offerings, and should ensure that they are comparing apples to apples during the procurement process.
- Fleets must develop a fairly sophisticated understanding of the existing electric infrastructure and demand, their electricity rates, and the types, number, duty cycles, and time available for charging of their vehicles—or contract a third party to do so for them.
- Fleets should plan on a site-by-site basis since charging infrastructure is not one size fits all.
- Fleet electrification will happen most where special programs are implemented to help mitigate hardware, installation, and electricity costs, at least in the initial stages of technology adoption.
- Fleets should consider investing in smart, networked charging software and services, particularly for deployments of multiple vehicles and/or vehicles with large battery capacities.
- Fleets should demand improvements from technology providers and utilities and inform them quickly of all dissatisfactions.
- As all new technologies go through learning curves, fleets should not make rash conclusions in the first months or year of operation, but realize that solutions will be iterative as experience amasses.

Fleets as well as utilities, regulators, and technology providers are constantly learning and developing in this rapidly evolving space. And innovative utility programs and rate structures are allowing commercial battery electric vehicles to charge successfully and economically in growing areas of the country. However, much broader and faster design and approval of these sorts of programs by utilities and regulators is needed in order to scale electric vehicle adoption across the nation. As much as possible, EV-friendly programs and rate structures should be standardized so that fleets with operations that span multiple utility service territories can scale their electrification efforts without having to reinvent the wheel in each new territory. It's important to remember that utilities are relatively new to the EV charging space, and that although it will require a significant departure from their historical rate structures and business models, it is in their financial interest to support the build-out of charging infrastructure because it offers additional rate-basing investments and load growth opportunities in an otherwise plateauing market.

It is also imperative that utilities understand the important differences between passenger EVs and commercial EVs. Not only is the charging capacity much higher for CBEVs, but they have unique needs and constraints due to their mission-focused operations, which are much less flexible than personal vehicle usage and charging times. As such, CBEVs need to be looked at as a distinct market rather than an extension of the passenger EV market.

While the charger itself is the most visible piece of the charging infrastructure ecosystem, fleets must focus more on the big picture than on simply comparing EVSEs. We expect more and more innovative networking and maintenance options to arise. Software will be invaluable as smart charging will be key to minimizing costs while also ensuring mission critical uptime of vehicles. Many business models exist to help manage charging, and fleets will need to decide what trade-offs they're comfortable making between risk management and price volatility. Fleets that develop expertise in smart charging will have a leg up on their peers, though innovative partnerships will allow even fleets new to the electrification space to be successful.

Smart charging and vehicle-to-grid capabilities may also enable new grid services that, if compensated for appropriately, may be a win-win-win for utilities, fleets, and ratepayers. That said, it is imperative that these services are piloted in the real world for further refinement, as they are mostly hypothetical today.

Last but certainly not least, charging infrastructure, though no doubt not sufficient today, should not be considered an insurmountable problem. Thomas Edison's first patent for the light bulb was filed in 1879 well before there was a North American power grid. Light bulb and electric motor technology ignited national development of new infrastructure to adapt society to the new technology rather than forcing the technology to fit poorly into the existing infrastructure. The power grid infrastructure was demand driven based on success of the electric devices that needed it. This lag between product introduction and infrastructure investment has been repeated many times, and there's no reason to think it won't be repeated for CBEV charging infrastructure as well.

"In order for electric trucks to scale, we need both the truck and the ability to charge it. The three keys to infrastructure deployment are standardization, collaboration for construction, and teaming with utility companies for the efficient delivery of electricity."

–Gary Horvat, VP of eMobility, Navistar, Inc.

THE FULL REPORT

The full report is available at www.nacfe.org and includes 160 references; a robust, current, relevant bibliography of charging infrastructure works; appendices that list charging infrastructure suppliers and utilities with electric truck charging programs; and 91 figures. See the Table of Contents below for more information on the full report:

1 Table of Contents

NACFE

The North American Council for Freight Efficiency (NACFE) is a nonprofit organization dedicated to doubling the freight efficiency of North American goods movement. For the past 10 years, NACFE has operated as a nonprofit in order to provide an independent, unbiased research organization for the transformation of the transportation industry. Data is critical and NACFE is proving to help the industry with real-world information that fleets can use to take action. In 2014, NACFE collaborated with Carbon War Room, founded by Sir Richard Branson and now a part of Rocky Mountain Institute (RMI), to deliver tools and reports to improve trucking efficiency. These reports include a series of Confidence Reports that detail the solutions that exist, highlight the benefits and consequences of each, and deliver decision-making tools for fleets, manufacturers, and others. As of early 2019, NACFE and RMI have completed 18 such reports covering nearly all the 85 technologies available.

www.nacfe.org

ROCKY MOUNTAIN INSTITUTE

Rocky Mountain Institute (RMI)—an independent nonprofit founded in 1982—transforms global energy use to create a clean, prosperous, and secure low-carbon future. It engages businesses, communities, institutions, and entrepreneurs to accelerate the adoption of market-based solutions that cost-effectively shift from fossil fuels to efficiency and renewables. RMI has offices in Basalt and Boulder, Colorado; New York City; Washington, D.C.; and Beijing.

www.rmi.org

GET INVOLVED

Trucking Efficiency is an exciting opportunity for fleets, manufacturers, and other trucking industry stakeholders.

Learn more at:

Or contact: Mike Roeth at mike.roeth@nacfe.org

Attachment B

Policy on Land Use and Sensitive Receptors

Purpose

For the past decade, the City of Beaumont was one of the fastest growing cities in the region. The City's proximity to Los Angeles, Orange and San Diego counties, the availability of affordable land and high quality of life have all contributed to making Beaumont an attractive place to live and work. The continuing rate of growth in Beaumont and in the larger region exceeds the capacity of the City's financial resources to meet the needs for transportation infrastructure. Warehousing, logistics, e-commerce and distribution are established sectors of the Inland Empire economy and are increasing in the City of Beaumont. These uses contribute to local job growth and continue to expand based on trends in e-commerce. Due to the City's location, providing direct access to I-10, SR-60 and SR79, it is anticipated that strong demand for growth in the logistics industry will continue.

The City recognizes construction and operations of logistics, warehouses and other similar types of projects in close proximity to sensitive land uses or sensitive receptors, negatively affects quality of life. ***Sensitive receptors generally include residences, schools, parks, playgrounds, community centers, assisted living, day care centers, nursing homes, hospitals, and similar uses.*** The City of Beaumont has all of these types of sensitive receptors and additionally has several active-55+ communities.

This policy is intended to provide a guide through which logistics, warehouses and similar projects can be planned in a way that lessens their impact on the community and the environment. This policy will aid in minimizing potential impacts to sensitive receptors by acknowledging the City's existing General Plan and zoning which provides location and standards for development of these types of projects and California Environmental Quality Act (CEQA) project analysis. This policy does not exempt a project from preparation of the appropriate environmental review and application of any necessary measures that may arise as a result. This policy provides criteria which shall be implemented to supplement project-level mitigation measures, to further reduce impacts related to logistics, warehousing and any project of similar size or type of development.

The application of this policy is intended to be included in the evaluation of and conditions of approval for individual development projects. This will provide standards for which applicants and the public can look to and will provide an opportunity for City staff to monitor individual conditions of approval. The policies are organized into specific categories, to address potential quality of life issues from initial design to construction and operations.

Applicability

The policy guidelines apply to new projects submitted after the policy approval date and will be implemented during the development review process.

This policy applies to logistics, warehouse and similar projects that include any building larger than 100,000 square feet in size or type. It is intended to provide a general guidance that will be appropriate for most industrial or logistics, warehouse or similar projects. Project-level review under CEQA applies to any project,

regardless of square footage and may include any technical reports including, but not limited to noise, greenhouse gas, air quality, and traffic. The Planning Department shall use this policy to review projects and in instances where a project does not conform to the policy shall document findings to be considered by the Planning Commission and City Council.

Analysis

1. An "Air Quality" study shall be prepared in accordance with CEQA and the South Coast Air Quality Management District (SCAQMD) guidelines which includes both project specific and cumulative impact analysis.

2. A "Health Risk Assessment" shall be prepared in accordance with CEQA and the South Coast Air Quality Management District (SCAQMD) guidelines when a proposed project meeting the criteria of this policy is located within 1,000 feet of a sensitive receptor.

3. A "Noise Impact Analysis" shall be prepared in accordance with CEQA guidelines to assess potential impacts to the neighboring properties and surrounding community.

4. A "Construction Traffic Control Plan" shall be prepared, reviewed and approved prior to issuance of a grading permit, which details the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations.

5. A "Traffic Study" or "Traffic Impact Analysis" shall be prepared in accordance with CEQA, analyzing both Vehicle Miles Traveled (VMT) and Level of Service (LOS) C as allowed by the City's General Plan. The study shall identify improvements and fair share costs for the project.

6. A stacking or queuing study shall be provided as part of the project review. The study shall identify the necessary on-site queuing area so vehicle and truck traffic waiting to access the site shall not extend into the public right-of-way.

7. A "Water Supply Assessment" shall be prepared as part of the environmental review process.

8. A "Sewer Study" shall be prepared as part of the project review process.

9. An "Economic Impact Study" shall be prepared as part of the project review process. At a minimum, the study shall provide a cost for service analysis, estimate of revenue generated, anticipated property tax revenue and any other information necessary to provide a comprehensive evaluation of the fiscal impacts to the City.

10. An "Energy Efficiency Plan" shall be prepared as part of the project review process which shows how the project will encourage efficiency above and beyond Title 24 requirements.

Construction Phase

1. During construction of the project, all copy of current California registration for each piece of construction equipment accessing the site shall be provided to the City. If equipment is not registered in

California proof of CARB-Compliant engines or newer as identified by the most current CARB engine standards shall be provided.

2. Construction contractors shall locate or park all stationary construction equipment away from sensitive receptors nearest the project site.

3. The surrounding streets shall be swept on a daily basis to remove any construction related debris and dirt.

4. Dust control measures meeting SCAQMD standards shall be implemented for all land disturbance and construction activity.

5. All Water Quality requirements and best practices shall be adhered to throughout the construction phase.

6. Construction contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

7. During construction, a City representative shall conduct an on-site inspection with a project representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts.

Siting and Design

1. Truck bays and loading docks shall be a minimum of 1,000 feet, from the property line of the sensitive receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design includes berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Dock doors shall not be visible from surrounding residential properties or the public right-of-way. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design.

2. Projects shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks not visible from sensitive receptors. Commercial trucks shall not be parked in the public right-of-way or nearby residential areas. Queuing shall not extend into the public right-of-way.

3. Truck driveways shall be placed on streets that do not front sensitive receptors.

4. Sites shall clearly mark entry and exit points for trucks and service vehicles.

5. Facility operators shall establish specific truck routes between the facility and regular destinations, identifying the most direct routes to the nearest highway/freeway and prohibit traveling near sensitive receptors or through residential neighborhoods. The truck route should be submitted as part of the entitlement package.

6. Separate entry and exit points for trucks and passenger vehicles shall be provided to minimize vehicle/truck conflict.

7. Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced no further apart than 25 feet on center. Trees utilized in landscape screening shall be a minimum of 36-inch box. A permanent maintenance mechanism shall be approved as part of the entitlement process to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan.

8. A "wing-wall" shall be installed perpendicular to the loading dock areas to further reduce truck or operational noise and to serve as an aesthetic screening feature for the loading area when adjacent to sensitive receptors.

9. All project lighting shall comply with the City's "Dark Sky Ordinance", Beaumont Municipal Code Chapter 8.50 Outdoor Lighting. Lighting shall be shielded and directed down to the interior of the site and not spill over onto adjacent properties.

10. Project facilities shall install electrical panels and conduit to facilitate future electrical connections, to eliminate idling of main and auxiliary engines during the loading and unloading process. At all cold storage facilities electrical connections shall be provided to each dock.

11. Facility construction and operational noise shall comply with Beaumont Municipal Code Chapter 9.02 Noise Control.

12. Sites shall be designed to significantly minimize aesthetic impact and structures shall have a neutral palette, blending in with the surrounding environment.

13. Any mechanical or structural equipment or components located on the exterior of the building shall be screened from view and enclosed to protect the equipment and deter vandalism.

Operation

1. Facility operators shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

2. Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.

3. On-site equipment shall be compliant with CARB and SCAQMD regulations.

4. Facility operators shall require all drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.

5. Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.

6. A minimum of 5% or as required by the Cal Green Code, whichever is greater of employee parking spaces shall be designated and infrastructure installed and operational for electric or other alternative fueled vehicles.

7. Externally announcing public address (PA) system are prohibited with the exception of emergency notifications.

8. Facility operational noise shall comply with Beaumont Municipal Code Chapter 9.02 Noise Control. Any ongoing operational noise shall be evaluated through the CEQA process.

Wayfinding

1. Wayfinding signs shall be posted in the appropriate locations that trucks should not idle for more than five (5) minutes and that truck drivers should turn off their engines when not in use.

2. Wayfinding signage shall be posted in the appropriate locations that clearly show the designated entry and exit points for trucks, service vehicles and passenger vehicles.

3. Signs stating parking and maintenance of all trucks is to be conducted within designated areas and not within the surrounding community or on public streets shall be posted in the appropriate locations.

4. Signs should be posted in the appropriate locations and handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services, if these services are not available onsite. The facility operator shall also email this information to drivers expected to visit the site, 24 hours in advance of their arrival.

5. Each facility shall designate a point of contact responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information should be provided to the City and updated annually, and signs should be posted in visible locations providing the contact information for the point of contact to the surrounding community. These signs shall also identify the website and contact information for the South Coast Air Quality Management District.

6. Signage shall comply with the City's Sign Ordinance, Beaumont Municipal Code Chapter 17.07 Signage, which may be amended from time to time.

Community Benefit

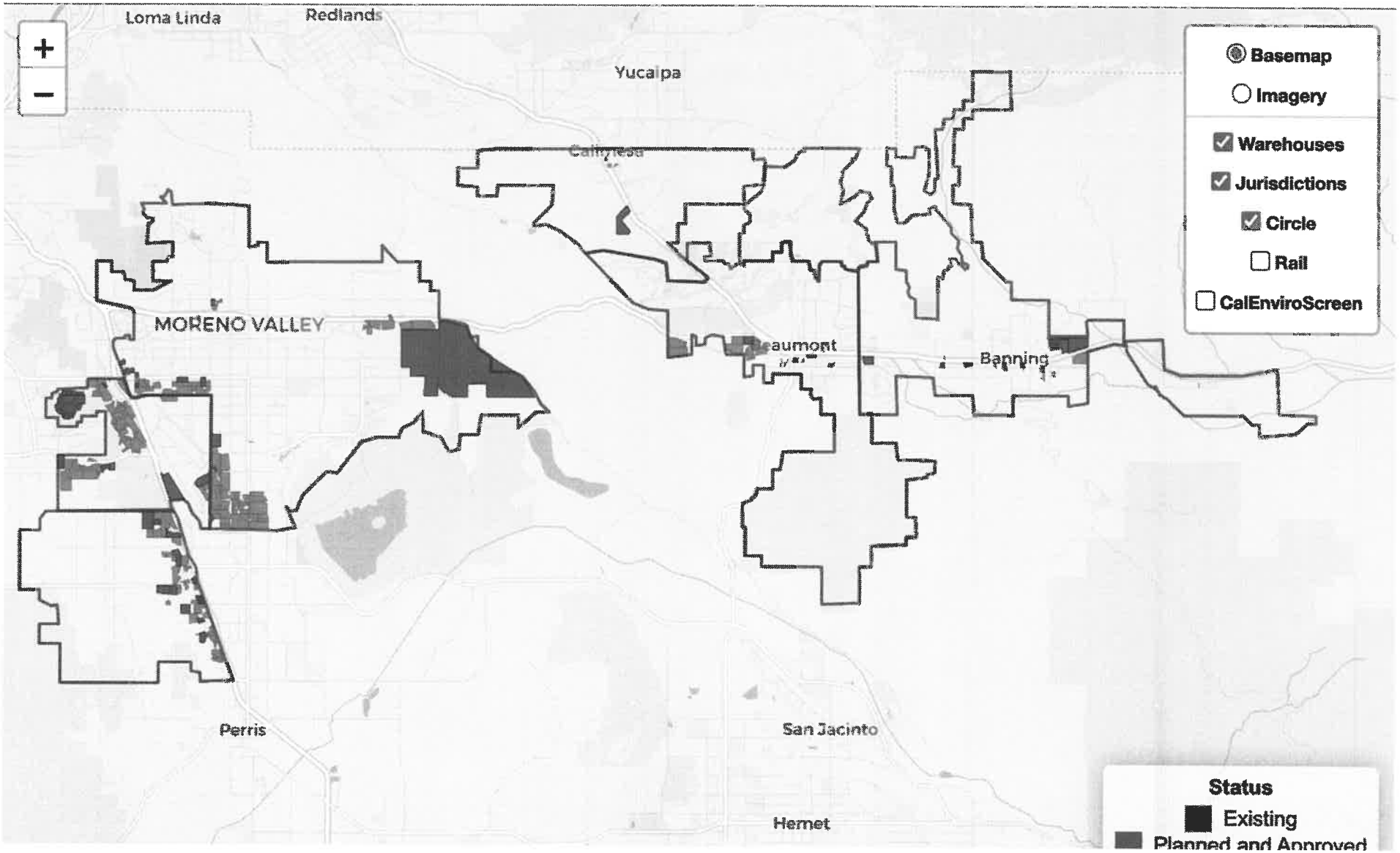
1. Applicants for proposed projects meeting the criteria for this policy shall engage in meaningful and transparent community outreach to engage the existing community in determining issues of concern. The applicant shall make a quantifiable effort to address concerns through site design and other means during the project entitlement process. Suggested outreach efforts include but are not limited to, hosting community meetings, making presentations at Homeowner's Association meetings, and Planning Commission workshops.

2. Warehouse/distribution, logistics, e-commerce and other similar types of industrial development typically produce some community impacts related to the construction and operation of these facilities. The

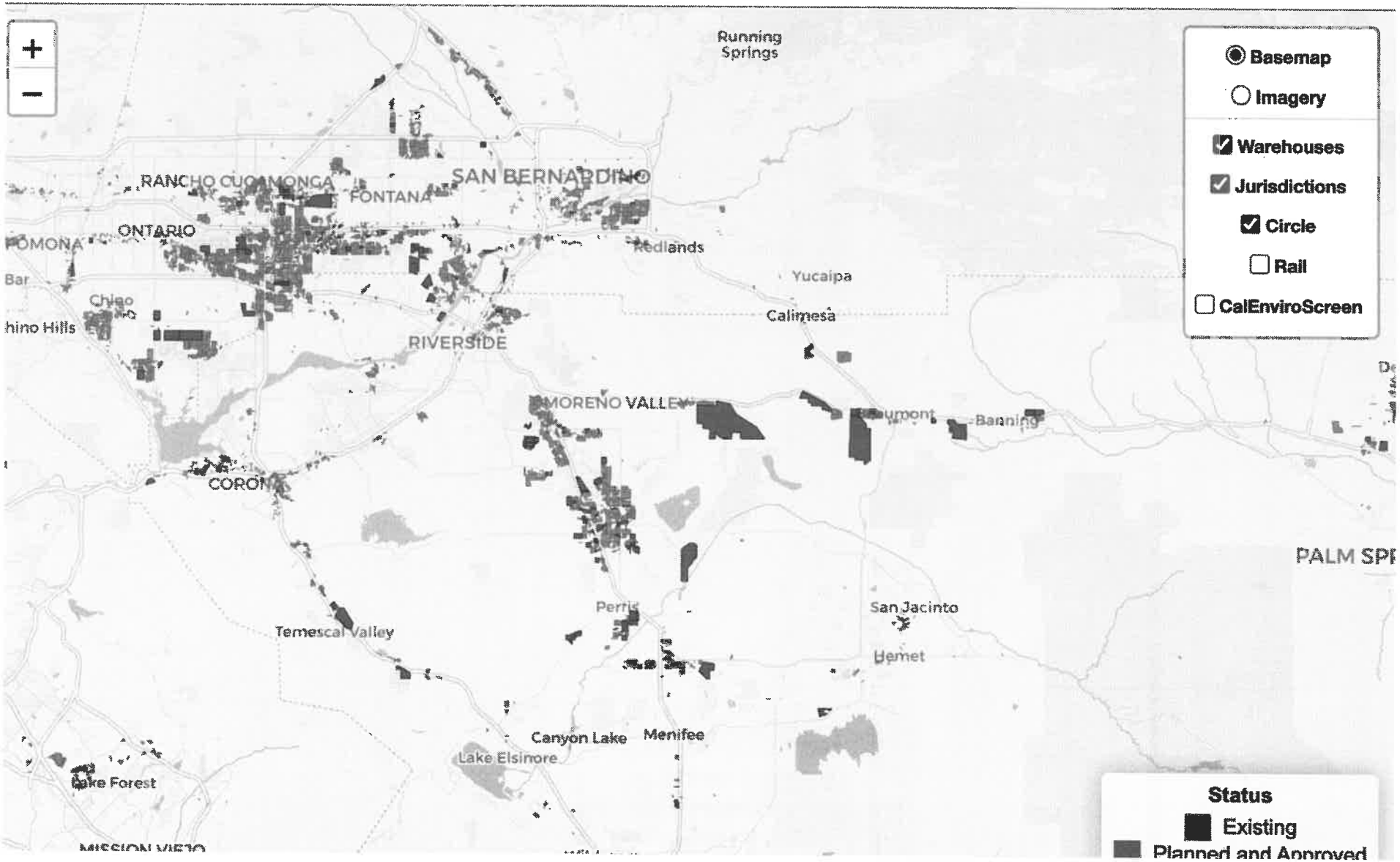
applicant for any new project will be required to participate in the Land Use Management Mitigation Fee, which would be utilized to address applied to further off-set potential air quality impacts to the community and provide a community benefit above and beyond any CEQA related mitigation measures. The fee would be based on a nexus study and subject to the requirements of California Government Code sections 66000-66025 (the "Mitigation Fee Act"), and Assembly Bill (AB) 1600. The fee will be collected on a one-time basis. Funds collected through the fee program will be subject to designation for use by the City Council and will generally be used for projects that directly benefit the impacted community wherein the project is located

Attachment C

Category	Warehouse count	Acreage	Warehouse floor space (Sq.Ft.)	Daily Truck trips	Daily Diesel PM (pounds)	Daily NOx (pounds)	Daily CO2 (metric tons)	Jobs
Existing	231	3,774	90,400,000	61,000	84.4	9,504	2565.5	30,192
Planned and Approved	55	3,972	95,200,000	64,000	88.5	9,971	2691.7	31,776



Category	Warehouse count	Acreage	Warehouse floor space (Sq.Ft.)	Daily Truck trips	Daily Diesel PM (pounds)	Daily NOx (pounds)	Daily CO2 (metric tons)	Jobs
Existing	9,011	59,202	1,418,400,000	950,000	1314	148,010	39954.2	473,616
Planned and Approved	377	18,307	438,600,000	294,000	406.7	45,805	12364.8	146,456



From: Christina Taylor
To: Carole Kendrick
Subject: Fwd: Please Oppose Beaumont Pointe Specific Plan!
Date: Monday, February 5, 2024 4:59:02 PM

FYI BPSP Comment Letter below.

CHRISTINA TAYLOR
Deputy City Manager
City of Beaumont
550 E. 6th Street, Beaumont, Ca 92223
Desk (951) 572-3212 | Fax (951) 769-8526
BeaumontCa.gov
Facebook | Twitter | Instagram | YouTube

#ACITYELEVATED

Get Outlook for iOS

From: Cindi Deats <cindi.deats@icloud.com>
Sent: Wednesday, January 31, 2024 3:53:39 PM
To: Christina Taylor <Ctaylor@beaumontca.gov>
Subject: Please Oppose Beaumont Pointe Specific Plan!

Hello!
My name is Cindi Deats. I am a local resident, run a small family farm near the Amazons.
I know all my neighbors in my neighborhood as well as many residents and business owners in Beaumont, Banning, Calimesa, Cherry Valley and beyond. Warehousing, shopping and hotels in that location will be bad for residents. Building right off of those highways is not what Beaumont needs at this time.
It will hinder our emergency services and evacuation will be impossible in the event of a natural disaster.
Residents do not envision our city becoming a warehousing hub like the rest of IE has become. We pride ourselves in not letting that happen out here.
Beaumont is a very rare location that residents love to live in, loading it with warehouses is just not acceptable.
The #1 ultimate plan for us residents is to prevent out of town, greedy builders turning this beautiful countryside into a moVal or Riverside. The charm of Beaumont, Banning, Idylwild, Cherry Valley, Calimesa, Oak Glen, even Redlands are our small businesses! Apples, the pumpkin patch, cherries, lavender festivals are things the residents in our area want to be known for. We are not a large scale warehousing district, nor do we want to ever be.
Let our cities be the places that travelers can't wait to stop, tour and shop at instead of the warehouse lined highways we drive through in LA and Orange counties.
I live here for the rural landscape and small town atmosphere therefore, you won't hear me saying I need a SuperTarget, chain hotels or brand new chain restaurants. I'm looking to continue to shop in our small local owned businesses, the businesses that fit with what I envision Beaumont to grow up to be. Active downtown, local family businesses, little parks, community feel, walking and biking friendly, pet friendly, restored & historic properties instead of ugly square warehouses.
Let's make market nights for Beaumont Cherry Valley Yucaipa Calimesa Banning etc in each city

showing that we all are supporting our individual small towns together and oppose large scale warehousing. We love growth but a little growth at a time!
I'd like to see a cap on the square footage allowed for warehouses in this area. When we do build future warehousing, after infrastructure is in place to support it, let's honor the theme that our towns recognize. Western or railroad themes. I enjoy high desert low water landscaping. Make the off ramps beautiful and different than all the usual things. I really love the Potrero Bridge made from iron, again fitting the theme that The Pass Area tries hard to stick to, Railroad and Western theme. I also think a forest of Evergreens that will eventually grow to cover the large, plain warehouses. Pre planning development such as planting an abundance of long living trees in the industrialized spaces of Beaumont would help minimize noise from warehousing traffic as well as pull the pollutants from the air that will settle here from the semi trucks, train, traffic and the warehousing itself. It would make commuting feel like a beautiful, relaxing drive home through the country side.
Let's slow down on future fast paced growth until we can fund and provide for our community the infrastructure needed to handle all we're trying to build. This will upset our residents greatly if we continue to do the work backwards.

If the city council considers selling land to any more developments like these warehouses without the major traffic improvements needed beforehand, if we have not accurately allocated funding for road improvements in these last few years then we have to take a real look at local government and the projects they are prioritizing over the dire needs of the residents.
I can assure you that Beaumont, with Banning community and the like, are the last people who want EVEN MORE Millions of sqft of warehousing built in their little slice of heaven. Contrary to the hundreds of "YES!" emails sent to the rest of our city council by the builders who dont live here and are purely financially motivated.

Most of Beaumonts people are working, home with their family and attending their children's extra curricular activities.
Most of Beaumonts people are struggling to find enough time in their days to prioritize family and making ends meet.
Most of Beaumonts people aren't going to write in or attend council meetings regularly because they are working, busy taxpayers with real issues who are blindly trusting our council to please represent us accordingly. Please understand that approving this now will wreak havoc on our fledgling highways and communities.
I believe I speak for most of Beaumonts people when I say that we don't want additional mass residential or warehousing projects to go forward at this time. Even if it comes with a few road improvements, it will not be near what is currently desperately needed for our roadways.
None of it is worth the change that will happen to our city and surrounding sister cities.
There will be more vehicles, noise and pollution around and through our little town, long time residents have probably never seen the likes of.

Other problematic changes will soon arise with overuse and development of Beaumonts land, there will be a great need for heavy roadwork. Bringing even more congested traffic, litter and crime near our homes.

We will have to widen existing and build many new major surrounding roads to accommodate the influx of traffic. More specifically, the on/off ramps of 6th St/60, Oak Valley, CV, Calimesa & Singleton. For this project specifically, Jackrabbit Tr, Westward, Bolo, Veile- all which are currently dirt country backroads used by residents to get to our farms. Heavy traffic right off our residential street would be detrimental to my neighbors.

Cherry Valley Blvd, Brookside Dr, Union St, Hannon Dr, Oak Valley and Beaumont Ave need to widen and reinforce their roads to withstand the major uptake of heavily loaded diesels since establishing warehouse development in that area. That hasn't happened yet and there are already too many truckers using our inner city roads. Not to mention all the other roads in town needing improvements.
Beaumont Ave bridge is residents' and travelers' primary bridge across the railroad tracks. It is a mess. When there are inevitable fires & earthquakes, we're all screwed trying to evacuate. I've had to evacuate my 5 acre property during the Rabbit Fire 2023 & it would be absolutely impossible to do

if they don't fix our existing infrastructure before they develop JackRabbit Rd and surrounding Badlands area! It's called the Badlands because of the fault line. It has been deemed unbuildable many times. Past EiRs have stated as much.
The traffic cumulative impact report needs to include present and future neighboring cities' warehouses and planned warehousing. Give is all the big picture, there are enough warehouses throughout IE! We will NOT be able to evacuate, read the analysis! Over 3 hours to evacuate around the Oak Valley, Olivewood areas.
Our city could have an honest concept of what life here will look like in the coming years and that truth will not make anyone happy!
We need to keep future industrial plans in our industrial area located on Fourth St. Any other hotels, shopping and dense residential offered by builders in this area just to sweeten the deal is not wise. We will not be able to evacuate.
We need a hillside ordinance in place so potential landowners and new builders come in knowing that this is not ideal land for large warehousing or mass housing to be built on top of. We should not allow it! It is directly on San Jacinto Fault Line, our existing homeowners are losing their home insurance left and right!
How can we plan on insuring assets when most people in our residential homes out here are getting dropped from their long term insurance companies because of the high fire risk? It's very difficult, this year especially, to find another company who will take the chance with insuring our homes.
We need frontage roads for ER vehicles and maintenance workers to maintain the natural gas pipes and electrical equipment.
Warehouse builders can not possibly fund any amount of road repair needed NOW in Beaumont and beyond, let alone AFTER the build!
How long will that realistically take? As of today, there is nothing in the records setting a date for much needed road improvement projects like that. That is of utmost importance to people in Beaumont.
Road work on a 2-lane highway while trying to be on time for work?
It is difficult enough getting to Beaumont High School or any elementary school within city limits, for that matter. Imagine how long that line will be for residents while we're waiting for a ton of semis and road workers at all the stop signs!
There will be too much large Semi Truck traffic for a roundabout so installing traffic lights will be necessary.
I am really uncomfortable with the rushing traffic and congestion near the schools already.
The city is going to have to add so many new stoplights with the handful of warehouses that are lined up to build after this one.
I hope the city sees and meet our needs and add flashing crosswalk lights across the road near all the schools because people are already sidetracked, running late, constantly running stop signals and causing accidents.
These updates for school children need to be made asap and will be imperative in ensuring their safety. Wide sidewalks for children on bikes and children who walk so they are not having to pass each other by one or more children riding or walking into the 2 lane road loaded with semis.
Additionally, the hotel. Hm. I'm just waiting for the day when our governor will allow us to house our homeless and all the new migrants there. Again, a little too close to our residences and schools for my comfort, sorry.
No judgement here but it is things like this that every resident of Beaumont, Cherry Valley, Banning, Calimesa and Yucaipa are thinking about. It is an even bigger concern of every one of our neighbors living in the nearby neighborhoods that warehousing is directly affecting.
Once warehousing built, there will soon be a need for gas stations nearby equipped for a large amount of trucks to refuel daily. Maybe a Loves and a Pilot? That will inevitably bring more crime/traffic/litter 24/7 to an area that has never had growth this massive before.
These may all just sound like big city problems but that's just it, this is not a big city.
Beaumont is just learning to recycle its own water instead of buying used water!(yeah, we buy our water)But it's got enough residents for its sewer system to be at capacity!

This is a huge HUGE issue that most residents don't know about. Warehousing, hotel, industrial builds will deplete clean drinking water needed for our residents. Let’s instead focus on the needs of the people that live here. Fix the sewers, roads, water processing system, aquifers and water storage! I call for a moratorium on large scale housing and warehouse builds until we can plan and build the infrastructure to support the recent growth we have already gone through.
This is not just affecting the city of Beaumont. We are a community of small towns & we’d like to stay that way.
I do hope our City Council COMPLETELY oppose the future planned warehouses on the books as well as propose a better planned land use for the out of town developers or they can move on. I would consider a more fitting project that actual members of our small community will really benefit from and be proud to have in Beaumont!

In place of Beaumont Pointe Specific Plan, since there are 2 brand new massive Amazons already there and the 60 and 10 freeways are PACKED right there, I propose council to completely deny this project and propose a moratorium on some more large building projects until our infrastructure can be dealt with correctly. Money is not needed from these projects for our town, no thank you.
Just dig out the holding ponds for now, to help replenish Beaumonts water storage since the basin is natural in our area.
Also, Beaumont doesn't want to make changes to existing land uses such as changing Rural Residental land into Industrial Land.

Thank you for your time,
Cindi Deats, American Citizen, lifetime Californian and current Beaumont Resident @ 13865 Bolo Court
Beaumont
661.487.7224

Sent from my iPhone with LOVE.

Carole Kendrick

From: Christina Taylor <Ctaylor@beaumontca.gov>
Sent: Friday, February 2, 2024 1:26 PM
To: Carole Kendrick
Subject: FW: Beaumont Pointe Specific Plan"

FYI... not sure if you got this.

CHRISTINA TAYLOR
Deputy City Manager

City of Beaumont
550 E. 6th Street, Beaumont, Ca 92223
Desk (951) 572-3212
BeaumontCa.gov
Facebook | Twitter | Instagram | YouTube

#ACITYELEVATED

-----Original Message-----
From: Denise Featherstone <defeather@icloud.com>
Sent: Thursday, February 1, 2024 12:15 PM
To: Christina Taylor <Ctaylor@beaumontca.gov>
Subject: Beaumont Pointe Specific Plan"

I am dismayed that the Beaumont City Council is continuing to try to build huge warehouses within our city limits. Have you looked at the freeways lately? Can you imagine thousands of trucks added to the 10 and 60 freeways? Our city streets will be impacted, too. Every time trucks need to travel off the freeway, our main streets will be over crowded. We've seen this happen in the past, when trains have been stopped in Beaumont. It is gridlock.

There is always the claim that it will bring jobs to our area, but that isn't quite true. The jobs required will be to build the behemoth warehouses, which vanish once the work is done. We neeeder permanent jobs, not just temporary ones.

I moved to Four Seasons Beaumont in 2012 because of the semi rural area surrounding the San Gorgonio Pass. I bought my home with views of the mountains and desert in the distance. I love the dark skies at night. All of this will disappear with the addition of warehouses and their trucks.

Please vote NO on the Beaumont Pointe Specific Plan.

Sincerely,Ci
Denise Featherstone
316 Blowing Rock
Beaumont, CA 92223

Law Office of Abigail Smith
A Professional Corporation
2305 Historic Decatur Road, Suite 100, San Diego, CA 92106

Abigail A. Smith, Esq.
Email: abby@socalceqa.com
Telephone: (951) 808-8595

VIA E-MAIL AND U.S. MAIL

February 20, 2024

City of Beaumont City Council
Beaumont Civic Center
550 E. 6th Street
Beaumont, CA 92223
nicolew@beaumontca.gov
emorgan@beaumontca.gov
CKendrick@beaumontca.gov

Re: Public Comments – Beaumont Pointe Specific Plan Project including Environmental Impact Report

Dear City of Beaumont City Council:

Please accept this letter on behalf of the Sierra Club regarding the Beaumont Pointe Specific Plan Project ("the Project") including the Environmental Impact Report ("the EIR"). Sierra Club understands that the City's Planning Commission considered the Project at its meeting of January 10, 2024, and that the Project will now be considered by the City Council on some date in the near future.

The Project is a request for a General Plan Amendment, a Pre-Zone, and related land use approvals for purposes of developing a 539.9-acre site with approximately 5,331,000 square feet of total development space consisting of commercial and industrial land uses, including approximately 336,000 square feet of commercial uses and 4,995,000 square feet of warehousing/logistics space over six industrial planning areas (232.6 acres). The industrial land uses will include users such as warehouse/storage, fulfillment center, high cube warehouse, cold storage warehouse and e-commerce operations. The industrial land uses will promise approximately 94% of the planned uses at the site.

The Project site is located in the San Gorgonio Pass Area of unincorporated Riverside County and in the City's Sphere of Influence. The site is currently zoned Controlled Development Areas with a minimum 20-acre lot size to allow one-family dwellings, agricultural and animal raising uses. The site is located within the Pass Area of the Riverside County General Plan and Pass Area Plan. According to the Project's Draft EIR, the Pass Area Plan "focuses on preserving the unique features found only in the Pass Area." (Draft EIR p. 3-5.) The Draft EIR states the Pass Area "is a distinctive geographical area between the Coachella, San Jacinto, and Moreno Valleys." (Draft

EIR p. 3-4.) The Project site is currently vacant and undeveloped except for the paved portions of the Jack Rabbit Trail. The Draft EIR describes the site as being "nestled in the rolling topography of the northern terminus of the San Jacinto Mountains." (Draft EIR p. 3-3.) The Project contains natural vegetation communities and drainage courses. (*Id*.) It contains hillsides, canyons, valleys, and "steep" ridges. (*Id.*; DEIR p. 4.1-2.) SR-60 is located to north of the Project site; rural mountainous lands are located directly to the south/southwest/southeast including natural drainage courses, unmarked trails, and the Jack Rabbit Trail. Lands to the south/southwest are designated for conservation under the Western Riverside County MSHCP. Similarly, the mountainous areas to the west are designated for conservation within the MSHCP.

By build-out, the Project is anticipated to generate **a total of 16,266 vehicle trips per day** including **2,240 daily big-rig truck trips** (Draft EIR p. 4.13-24). The Project funnels these 2,240 big rig trucks on local roadways such as 4th Street and Portero Boulevard that is shared with local traffic. Vehicles will not access the Project site directly from SR-60 but rather must use local streets for ingress/egress to the site. The Project's substantial number of vehicle trips contribute to the Project's significant air quality, greenhouse gas emission, noise, and "VMT" (traffic) impacts.

Due to the site's topography, Project entails substantial grading of natural landforms and areas within the City's distinctive hillside areas including within "open space" areas inside the Project footprint. Natural and unique landforms will be replaced by manufactured slopes and flat-roofed, 60-foot box-style warehouse buildings as well as light poles (40-45 feet), paved roadways, and potentially a 125-room hotel. The Project proposes to expand development south of SR-60 by bringing urban infrastructure to an undeveloped natural area, creating the potential for further development of undeveloped areas in unincorporated Riverside County. For instance, the Project will extend 4th Street to make a roadway connection to the Project site.

The Project is located on a hillside at a relatively steep grade and proposes one primary vehicle access point. A secondary emergency access point is provided according to the EIR. In other words, the entirety of the Project will depend on one point of vehicular access, perhaps two depending on the nature of fire event, for evacuation purposes. This is in combination with evacuating traffic of existing industrial buildings along 4th Avenue (two Amazon facilities, the future Hidden Valley warehouse plus additional) in addition to residents of nearby neighborhoods.

Warehouse buildings are designed with loading docks on <u>both sides</u> (*i.e.,* maximized for industrial operations) despite being adjacent to an MSCHP Conservation Area to the south and being visible from vantage points to the north.

The energy efficiency measures identified in Draft EIR pp. 3-18 – 3-19 are not requirements of the Project through the CEQA mitigation program. All measures identified in or relied upon in the Draft EIR must be made enforceable through the Project's CEQA mitigation program. There are numerous other, feasible mitigation measures that must be adopted before the Project with significant impacts can be approved. We have identified additional measures throughout this letter. Finally, the EIR must examine a reasonable range of project alternatives and the City must adopt the environmentally superior alternative absent adequate findings in the record of infeasibility.

In accordance with the California Environmental Quality Act ("CEQA"), the EIR must be revised with further analysis, and it must identify additional mitigation for significant impacts. We therefore respectfully urge the Council to continue this Project until further action is taken towards appropriate analysis and mitigation of Project impacts.

Aesthetic Impacts

The Project will result in the conversion of the 539-acre site from vacant, undeveloped, natural lands and to large, box-style warehouse buildings up to 60 feet in height. Buildings will be constructed on flat concrete pads along an existing steep ridgeline characterized by rolling hills and natural vegetation. The Project would *wholly replace* natural landforms thereby substantially and permanently altering ridgelines and hillsides which are considered to be "significant" natural and visual resources according to the EIR. The Project proposes a massive amount of grading ("substantial earthwork") of steep ridgelines and hillsides. Natural slopes will be replaced by "manufactured slopes" including in PA 9 and in open space areas. The Draft EIR's analysis does not support the conclusion of less than significant. The EIR recognizes that "landforms in mid-ground views (PAs 1-8) would be altered for the development." (DEIR p. 4.1-13.)

The record does not disclose the level of impact. There are no "before" photographs of the site with sufficient detail to show how the Project will impact it, and there are no visual simulations of the actual development*, i.e.,* there are no visual depictions to show the buildings, lighting, and roadways including relative to surrounding vantage points such as from homes to the east of SR 60 or from SR 60. The record contains Figure 4.1-2, but this is not sufficient to provide realistic representations of Project buildings from surrounding vantage points (*see e.g*. Figure 4.3.-1). This single visual model does not illustrate what the buildings will actually look like and do not show the urban infrastructure including lighting (40-60 foot light poles) including at nighttime. Nor does it show the commercial buildings including 125-room hotel which presumably will be a prominent feature on the hillside given its planned location on the northeast corner of the site. Further, the EIR does not discuss whether the site contains rock outcroppings and whether these will be altered because of the Project. The permanent destruction of rock outcroppings must be disclosed and mitigated. The EIR indicates that some "blasting" may occur of landforms.

Based on the permanent alterations of natural landforms that will occur including flattening ridges and hillsides and replacing these natural landforms with massive box-style industrial buildings and related infrastructure and roadways there are also conflicts with policies of the City's General Plan that are intended to preserve, protect and minimize impacts to these resources, including policies 3.12.1, 3.12.2, 3.12.3, 3.12.4, 8.6.1, 8.6.3, 8.6.4, 8.9.2, 8.9.3, and 8.9.4. Given the importance placed on the preservation of natural landforms through the General Plan, and the permanent loss of these resources as a result of the Project, the EIR's finding of less than significant is not supported.

Moreover, the Project's lighting impacts have not been assessed as to the MSHCP Conservation Area. Artificial nighttime lighting negatively impacts animal species in a variety of ways and it has not been shown that the Project's lighting plan will adequately address the "edge

effects" of this Project on the existing conservation area.[1] [2] [3]

Appropriate mitigation must be adopted before the Project can be approved. This could include limiting the height of the buildings to 45 feet for example; locating truck docks on the southside of buildings only (at present loading docks are located on both sides of buildings); reducing the number of buildings or shrinking the size of the buildings including by way of "clustering" of development to the least sensitive areas of the site; increasing landscaping to buffer buildings; and avoidance of the most sensitive resources such as rock outrcroppings.

Air Quality Impacts

The Project will result in significant operational air quality emissions. In terms of NOx emissions, the Project at full operation will exceed the applicable threshold of significance by approximately nine times (total NOx emissions = 494.5 lbs per day compared to SCAQMD threshold of significance of 55 lbs per day). If construction and operation phases overlap, these emissions are far greater (675 lbs per day). (EIR 4.3-41 - 4.3-42.) Despite these significant operational impacts, the EIR fails to adopt all feasible mitigation to reduce these impacts consistent with CEQA.

The majority of the Project's air quality emissions are caused by mobile emissions. An EIR's central purpose is to identify a project's significant environmental effects and then evaluate ways of avoiding or minimizing them. (Cal. Public Resources Code, §§ 21002.1(a), 21061.) The City must adopt *any* feasible mitigation measure that can substantially lessen the project's significant air quality environmental impacts including due to mobile emissions. (Cal. Pub. Res. C. § 21002; State CEQA Guidelines, § 15002(a)(3).)

Title 24/Cal Green does not currently require the installation of electric vehicle (EV) charging units for cars or trucks; the Building Code requires electrical conduit for vehicle charging stations *but not charging units*. The Project must be conditioned to require the installation of electric vehicle (EV) charging units at the time of occupancy of each phase of the development. EV vehicle charging units are entirely feasible and standard practice.[4] The EIR mentions EV units in the discussion but none are required through the mitigation program and the record contains conflicting information as to how many units will be installed, where they will be installed, or when these units will be installed and operational.

The Project should also be conditioned to require EV charging units for heavy duty and

[1] https://darksky.org/resources/what-is-light-pollution/effects/wildlife-ecosystems/
Hyperlinks and their contents cited in this letter are fully incorporated herein by reference, and their contents are summarized in the body of the letter.
[2] https://kids.niehs.nih.gov/topics/natural-world/wildlife/ecology/lighting
[3] https://www.earthobservatory.nasa.gov/images/145767/night-lights-can-disrupt-wildlife
[4] https://www.sdge.com/residential/electric-vehicles/power-your-drive/public-charging#types

medium duty trucks. Level 3/DC Fast (or Quick) Chargers (DCFC) should be required[5] (*see id*.; *see also* **Attachment A** hereto [big rig truck with battery size of 550kw and range of 250 miles take approximately 24 hours to charge with a Level 2 charger].) This comment also applies to "medium duty" vehicles such as delivery vans. *See* [6] [FedEx vans charge in hours with DC quick charger/Level 3].) Chargers must be required that are able to charge the battery of a Class 8 (heavy duty/big rig) truck as well as have the battery range needed to ensure these trucks could meet a "two shift" or even a "one shift" schedule. These chargers are feasible and available on the commercial market.[7]

The Project should adopt further measures to reduce air quality impacts, including:

- Constructing building roofs with "light colored roofing materials." Cool roofs retain less heat and reflect more sunlight, thus lowering energy demand and reducing the "heat island" effect of a building. The Project must be conditioned to use roofing materials with a solar reflectance index ("SRI") of 78 for at least 75% of the roof surface (portions not covered in solar), consistent with USGBC standards. To provide measurable environmental benefit, the roofing material must be at the *highest possible* rating. *See* [8]
- Obtaining LEED certification to the most current USGBC[9] rating system for all industrial buildings, where such certification would require the applicant to implement sustainability measures that provide environmental benefits and off-set impacts.
- Installing concrete, preferably white concrete, in all parking areas. Light-colored concrete is more reflective of sunlight, thus employing concrete in all parking areas will reduce the "heat island" effect of the Project. [10] [11] Among other benefits, cooler surfaces and air reduce the need for air conditioning in vehicles.
- Providing landscaping in parking areas to provide 50% shade coverage within 10 years of operations. This can also reduce "heat island" effects and reduce the need for air conditioning.
- Installing and utilizing solar power for 100% of the facility's total electricity demand including electric vehicle parking in parking areas and automation within buildings. Solar power is entirely feasible and is particularly appropriate for a Project of this size, scale, and location.
- Including within buildings a "truck operator" lounge of a reasonable size which is available to truck operators with seating, restrooms, vending machines, and showers if size allows. The purpose of this lounge is to reduce the need for operators to wait in their cabs running either their diesel truck engine or diesel "APUs" either on- or

[5] https://blog.evbox.com/level-3-charging-speed
[6] https://www.carscoops.com/2018/11/fedex-adds-1000-china-built-chanje-f8100-electric-vans-fleet/
[7] https://polb.com/port-info/news-and-press/charging-station-to-power-electric-trucks-in-port-11-30-2023/
[8] https://www.energy.gov/sites/prod/files/2013/10/f3/coolroofguide.pdf
[9] https://www.usgbc.org/leed
[10] https://coolcalifornia.arb.ca.gov/cool-pave-how
[11] https://heatisland.lbl.gov/coolscience/cool-pavements

off-site. Signage shall also be provided notifying truck operators that a lounge(s) is available for their use.

- The California Attorney General has published a list of best practices for warehouse developments: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf These include:
  - Requiring that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2010 model-year emissions equivalent engine standards as currently defined in California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and state upon request.
  - Requiring all heavy-duty vehicles entering or operated on the project site to be zero-emission beginning in 2030.
  - Requiring on-site equipment, such as forklifts and yard trucks, to be electric *only* with the necessary electrical charging stations provided.
  - Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
  - Forbidding trucks from idling for more than two minutes and requiring operators to turn off engines when not in use.
  - Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
  - Constructing electric truck charging stations proportional to the number of dock doors at the project.
- Constructing electric light-duty vehicle charging stations proportional to the number of parking spaces at the project.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity, such as equal to the building's projected energy needs.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.
- Achieving certification of compliance with LEED green building standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.

- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.

The EIR finds that NOx (diesel-related) impacts are significant (approximately nine times the threshold of significance). In the aggregate, the southern-California "goods movement network" is a "major source of emissions that contribute to the region's air pollution," and the southern California area "continues to have the worse air quality in the nation." (https://www.ca-ilg.org/sites/main/files/file-attachments/f2012rtpscs.pdf?1383110821) A "key component of air pollution is nitrogen oxides (NOx). NOx is emitted whenever fuel is combusted and reacts in the air to form ozone (smog) and fine particulates." (*Id*.) Despite "aggressive strategies" in the South Coast Air Basin, "it is estimated that NOx emissions will need to be reduced by approximately two-thirds in 2023 and three-quarters in 2030." (*Id*.) Addressing NOx impacts associated with mobile sources is key to mitigating the Project's significant air quality impacts. According to the SCAQMD's Blueprint for Clean Air (2016)[12], the southern California air basin will require approximately a 65 percent reduction in NOx emissions, *above and beyond existing measures*, to meet air quality standards.

The Project should thus establish fleet efficiency requirements for vehicle fleets. This should include, at a minimum, requirements that industrial tenants shall use exclusively zero emission light and medium-duty delivery trucks and vans; shall use only zero emission service equipment such as forklifts and yard trucks (electric only/*no natural gas*); and shall use near-zero and zero-emission technologies in heavy-duty applications such as "last mile delivery."[13] As the State moves toward its goal of zero emission goods movement, the City must ensure that the Project is in line with this important objective by also requiring the *phase-in* of zero emission or clean technology for *heavy duty* trucks. According to CARB, actions to deploy both zero emission and cleaner combustion technologies will be essential to meet air quality goals in California particularly with respect to goods movement. [14] Additional, feasible mitigation for operational air quality impacts includes the phase-in of electric, hybrid electric, hydrogen electric, or battery operated (*i.e*., non-diesel) trucks. The Project should be conditioned to adopt a "Diesel Minimization Plan" whereby zero emission trucks are phased in, *e.g*., 25% of truck fleets shall use zero emission technology by 2030, and increase that percentage by 10% per year, until 100% of trucks operating on sites are zero emission. This approach to mitigation is consistent with California regulations regarding phase-in of electric vehicles.[15] [16] (California requiring

[12] https://www.aqmd.gov/docs/default-source/Agendas/aqmp/white-paper-working-groups/wp-blueprint-revdf.pdf?sfvrsn=2
[13] https://www.nbcnews.com/tech/tech-news/treated-sacrifices-families-breathe-toxic-fumes-california-s-warehouse-hub-n1265420
[14] https://ww3.arb.ca.gov/planning/sip/2016sip/2016mobsrc.pdf
[15] https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035
[16] https://www.cnbc.com/2023/03/31/california-requires-half-of-heavy-trucks-sales-to-be-electric-by-

manufacturers to produce zero emission trucks beginning in 2024); *see also* (discussing CARB's Advanced Clean Truck Rule)[17].) A mitigation measure is feasible if it can be achieved in a reasonable period of time. (Guidelines, § 15364.)

The Project must establish a "Truck Route" otherwise MM 4.3-17 is ineffective. The EIR does not indicate the path of truck travel and we could not locate any condition that would require trucks to use a certain path of travel, but it is assumed that trucks will use local roadways for access to SR-60 and I-10.

Finally, to the extent the Project purports to include "project design features" aimed at reducing air quality emissions these must be made enforceable requirements through the Project's CEQA mitigation program. Impacts must also be assessed and disclosed apart from any "design features" especially where they are not mandatory requirements of the Project.

Biological Resources

The Project proposes to construct and operate a massive warehouse complex adjacent to MSHCP Conservation Area(s). This has the potential for disruption and harm to biological species and habitat within the Conservation Area. For instance, noise impacts during the Project's anticipated five years of construction are not shown to be less than significant in terms of impacts to biological resources particularly at nighttime. The Conservation Area is a natural area containing biological resources including habitat for protected species. The Project will entail substantial grading and other construction activities including potentially "blasting" of significant landforms. These impacts have not been properly assessed and mitigated.

The Draft EIR does not demonstrate that noise impacts are less than significant with respect to adjacent conserved lands in terms of the residential noise threshold or otherwise. The record does not demonstrate that Planning Area (PA) 9 would serve as a "buffer" to ensure that noise levels due to Project operations *do not exceed the residential noise standard* in terms of conserved lands located immediately adjacent to the Project site particularly at nighttime.

The Draft EIR acknowledges the potential for "edge effects" to adjacent conserved lands. These include nighttime lighting and noise impacts that will adversely impact the habitat of biological species within the conserved lands. Additional biological mitigation should include: locating building loading docks on the northside of buildings only, or designing buildings so that loading docks and Project roadways are located as far away as possible from sensitive biological areas including the MSHCP Conservation Area. At present buildings have loading docks on *both sides* which is not necessary for operations as buildings will be built on speculation. The Project site maximizes development at the expense of providing a more sensitive transition between uses for the benefit of established biological habitat and known biological resources.

2035.html#:~:text=The%20state%27s%20rule%20requires%20manufacturers,on%20the%20road%20by%202035.

[17] https://ww2.arb.ca.gov/resources/fact-sheets/advanced-clean-trucks-fact-sheet

Greenhouse Gas Emissions

The State of California has committed to aggressive goals for the reduction of the emissions causing global climate change. Executive Order S-3-05 establishes a 2030 target of a 40 percent GHG reduction below 1990 levels; Executive Order S-3-05 establishes a GHG emission reduction target of 80% below 1990 levels by 2050; and Executive Order B-16-2012 establishes a target for the reduction of GHG emissions from the transportation sector of 80% below 1990 levels by 2050. The City has adopted targets in line with the State Requirements (General Plan Policy 8.3.1 and Sustainable Beaumont/Climate Action Plan ("CAP")). Roughly a billion square feet of the Inland Empire is devoted to warehouses.[18] The Project serves to increase cumulative GHG emissions by building even more warehousing, but it fails to adopt all feasible mitigation for the cumulatively significant impact.

The Project will result in total GHG emissions of 63,911.07 MTCO2e/year. This vastly exceeds the adopted threshold of significance of 3,000 MTCO2e/year. As such the Project must adopt all feasible mitigation. Air quality mitigation measures listed above (including the phase-in of zero emission trucks) should be considered feasible mitigation for GHG impacts. Many of the Project's "sustainability features" are already requirements of Title 24/CalGreen, as such they cannot be considered "mitigation"; and they do not address mobile emissions, which are the greatest source of the Project's GHG emissions. For instance, the Project does not provide bike paths and the site will not be served by public transit. Accessible and safe bike paths as well as access to public transit should be considered feasible mitigation for significant GHG emissions related to mobile emissions.

Moreover, under Table 4.8-5, the Project has significant conflicts with the City's CAP and other plans adopting for the purposes of reducing GHGs, including, but not limited to:

City of Beaumont CAP

Goal 6: the Project can reduce its heat island effects by using only light-colored concrete in parking areas and roadways preferably "white concrete"; by increasing landscaping in parking areas; and by covering parking areas with solar canopy structures.

Goal 7: the Project has a significant VMT impact; the City should investigate and establish a programmatic VMT reduction fund (see discussion below).

Goal 9: the Project should maximize solar power by committing, through enforceable mitigation measures, to 100% solar power for all aspects of the facility's operations as well as requiring buildings to provide maximize "solar ready" roofs to allow for expansion of solar panels to accommodate future electric vehicle charging (trucks).

Goal 10: the Project patently conflicts with this goal as it does not "decrease GHG emissions from new development"; it vastly *increases* GHG emissions.

[18] https://calmatters.org/commentary/2023/09/inland-empire-warehouse-boom-rejections/

City of Beaumont General Plan

Policy 3.1.12: The Project does not locate "less intensive rural development within proximity to open space areas". It locates an intense warehouse complex with loading docks on both sides of buildings and truck travel lanes adjacent to open space conservation areas. The Project also includes "disturbance *within* areas designated as Open Space." (emphasis added)

Policy 4.1.5: the Project is not "required" to provide a public transit "connection."

Policy 4.4.3: the Project does not "improve safety for all transportation users." There are no bicycle paths and no public transit. The Project is not walkable to homes, and it will require use of personal vehicles by employees and visitors to commercial areas (if built), which is neither equitable nor environmentally sustainable. The same discussion applies to Policy 11.12.6.

County of Riverside CAP

It is not clear that the County of Riverside's CAP Screening Table is relevant to the conclusions of the EIR where the Draft EIR states that consistency with the CAP is shown for "informational purposes." However, to the extent the EIR *relies* on the CAP to determine the level of Project impacts and relies on the CAP Screening Table for purposes of *mitigation*, the Project is not shown to be consistent, including there is *no enforceable* mitigation requirement of photovoltaic power for which the Project claims 19 points under the Screening Table. Many of the Screening Table measures are already requirements of Title 24 (*e.g.*, bike lockers) thus claiming them as "mitigation" is inappropriate particularly where the EIR already reduces GHG emissions by 30% due to compliance with Title 24. The Project incredibly takes "480" points under the Screening Table for installing EV charging stations (the EIR notes that the Project "is anticipated to include 60 EV charging stations"; yet elsewhere the EIR states "15 electric vehicle charging stations"). In either case, the EV chargers are <u>not</u> part of the CEQA mitigation program. The Project further takes 3 points for providing bike lockers but there are no bike paths as part of the Project so that bicycle lockers do not seem to have a practical application. The Project is uphill and not a reasonable walking distance from any existing residential area.

SCAG 2020-2045 RTC/SCS

Goal 5: the Project does not reduce GHG emissions and improve air quality; it causes significant GHG emissions and significant air quality impacts.

Goal 10: the Project develops natural lands and replaces it with warehouse development bringing vehicles, big rig trucks, lighting, and noise ("urban development)" to a natural, undeveloped area adjacent to MSHCP Conservation Areas. Moreover, the Project is not located within "the City of Beaumont"; it is located in Riverside County in an area designated for conservation under the MSHCP.

Overall, the Project does not decrease VMT (it vastly increases VMT) and therefore is not consistent with plans and polices aimed at reducing VMT to reduce GHG emissions in southern California. In terms of proximity to the regional transportation network, access to the Project site is via 4th Street and local roadways including Portero Boulevard. Trucks and vehicles will must traverse local roadways to reach the Project site; the site is not accessible from SR-60.

County of Riverside General Plan

LU 2.1 (f): the Project does not incorporate "multi-modal transportation opportunities" in

that there are no bike paths and no public transit accommodations or access. The site is not within walking distance of anywhere.

LU 2.1 (g): the Project will be built in an environmentally sensitive, high risk fire zone.

LU 4.1: the Project has no requirement of solar energy; the site has no bicycle routes. Generally speaking the site is located far away from any other developed areas and therefore necessitates vehicle use.

LU 8.12: there is no requirement of local hiring so it is unclear that the Project would create a substantial number of jobs "that would be filled by residents of the City and surrounding communities" as claimed. Elsewhere in the EIR it is stated that warehouse distribution/e-commerce facilities are becoming increasingly automated.

LU 11.4: the Project does not provide bicycle paths or public transit. The fact that "sidewalks" will be provided is the minimum requirement to meet accessibility standards under Title 24.

LU 11.5: the Project does not "ensure that all new developments reduce [GHG] emissions". The Project vastly increases GHG emissions.

OS 16.8: the Project does not provide access to public transit. The inclusion of bicycle racks is already a requirement of Title 24. The Project must go beyond existing regulations to increase sustainability measures. The Project must include bicycle paths to encourage the use of bicycles as an alternate mode of transportation. This would include the use of "e-bikes."

OS 16.9: the Draft EIR does not include mitigation to provide within Project buildings "passive, solar design and day-lighting" such as sky lights. Sky lights should be required in all warehouse buildings particularly in employee areas to reduce the need for overhead lighting and provide enhanced working conditions for employees.

Overall, the Project does not reduce VMT and therefore is inconsistent with policies and goals related to reducing vehicle dependency. Among other things the Project does not provide bike lanes or access to public transit. The Project is primarily a warehouse complex located on a steep hillside on the south side of SR-60, and it is not located within walking distance from any residential or commercial areas.

Furthermore, MM 4.8-1 is inadequate under CEQA. It states that the Project will implement the measures of Table 4.8-6 but may also "achieve equivalent reductions from other measures approved by the City." This does not amount to certain and enforceable mitigation under CEQA in part because performance standards are not specified and these "other measures" will be formulated after Project approval. Moreover, the City will only "verify" the measures "prior to the issuance of the final Certificate of Occupancy," which may never occur, since there is no guarantee that all phases of the Project will be developed (including the commercial phase/Phase 3). Additionally, Table 4.8-10 asserts the Project will include a requirement to offset 60% of energy demand via photovoltaic solar but this is neither specified in the GHG Screening Table analysis or in the mitigation program. Again the City should also consider additional measures aimed at reducing VMT including *programmatic* VMT mitigation (see below).

Energy Demand

State CEQA Guidelines Appendix F provides that "[t]he goal of conserving energy implies

the wise and efficient use of energy. The means of achieving this goal include: (1) decreasing overall per capita energy consumption; (2) *decreasing* reliance on fossil fuels such as coal, natural gas and oil, and (3) *increasing* reliance on renewable energy sources." (emphasis added) Appendix F puts "particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy." The EIR's finding of less than significant with respect to energy resources is not supported.

The Project will consume 53,857,582 kBTU of natural gas, 25,747,206 kWh of electricity, and 5,318,792 gallons of fuel annually. The Draft EIR concludes that impacts are less than significant because the Project represents a small percentage of energy consumption compared to State-wide energy usage and fuel demand. Accordingly the Project does not adopt any energy mitigation measures.

The Project creates a massive demand for electricity, but does not, for instance, "increase reliance on renewable energy sources." (*See* CEQA Guidelines Appendix F.) This Project must mitigate its energy impacts. The installation and utilization of a solar energy system for 100% of the facility's total energy demands including all electric vehicle charging could vastly reduce the Project's energy impacts consistent with Guidelines Appendix F. The City must impose measures on the Project to ensure compliance with Guidelines, Appendix F and to advance the policies and goals of Senate Bill 100 which commits to 100% clean energy in California by 2045. The Draft EIR indicates that the Project will rely on renewables for 20% of the Project's energy demands but this is not part of the CEQA mitigation program and it is unclear how this measure will be implemented. Flat-roofed warehouse buildings must maximize their reliance on solar power including maximizing solar readiness for future expansion of PV panels to meet additional energy needs (charging of electric trucks).

The Project should be required to adopt further measures to reduce Vehicle Miles Traveled ("VMT") to reduce fuel consumption. The Draft EIR reasons that VMT will be reduced because at full buildout the Project is anticipated to employ approximately 5,000 persons. There is no requirement of local hiring so that assumptions that employees will travel shorter distances to work are not based in fact, and all employees will be dependent on cars as the uphill site is not within reasonable walking distance of any residences or a transit stop. The Project increases VMT and is therefore patently inconsistent with land use plans - local, regional, and State – that aim to reduce VMT. For instance, according to the 2022 CARB Scoping Plan[19],

[19] https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf

> [c]ontrary to popular belief, zero-emission vehicles (ZEV) alone are not enough to solve the climate crisis. The 2022 Scoping Plan illustrates that despite cleaner vehicles and low- carbon fuels, the path to carbon neutrality by 2045 also depends on reducing per capita VMT (the total passenger vehicle miles driven by an average person in California on any given day). To meet the carbon neutrality goal, the Scoping Plan proposes reducing VMT from 24.6 miles per day in 2019 to 18.4 miles by 2030 (a 25 percent reduction) and to 17.2 miles per day by 2045 (a 30 percent reduction).

To reduce VMT consistent with State, regional and local plans, the Project should consider an alternate development scenario involving more mixed-use development balancing professional and business park uses with commercial and warehouse uses. As proposed 94% of the Project's developed space are industrial warehouses. The Project should consider committing to local hiring to reduce VMT. The Project should incorporate safe and accessible bike lanes as well as access to public transit. The City should also explore *programmatic VMT mitigation options*. Other jurisdictions like the City of Escondido are evaluating "VMT Exchange Programs" for instance[20]. *See also* [21] [22].

Finally, mitigation measure 4.3-8 must be revised to require only electric outdoor cargo-handling equipment ("non diesel" includes natural gas/CNG).

Land Use Impacts

Contrary to the conclusions of the Draft EIR, the Project results in significant land use impacts, including, but not limited to, conflicts between the Project and City of Banning General Plan policies as discussed in the GHG section above. The Project also conflicts with General Plan Policies 3.4.8, Policy 3.11.9, Policy 3.12.2, Policy 3.12.3, Policy 3.12.4, Policy 4.1.5, Policy 4.6.2, Policy 8.5.1, Policy 8.6.1, Policy 8.9.2, Policy 8.9.3, 8.9.4, Policy 8.10.4, and Policy 10.1.5 as well as General Plan policies related to noise.

The Project is also inconsistent with Riverside County General Plan Policies, including LU 7.7 in that "buffers" are not required between intense industrial uses and watercourse areas including their habitat. The Project does not provide transportation options and bikeways consistent with Policies C 1.2 and C 1.7. In terms of biological impacts, the EIR does not demonstrate that the Project is consistent with Policy OS 4.9 which "discourage[s] development within watercourses and areas within 100 feet of the outside boundary of riparian vegetation." The record does not demonstrate the Project is consistent with Policy OS 5.5 to "preserve and enhance existing native

---

20 https://www.escondido.org/Data/Sites/1/media/Planning/VMT/EscondidoFeeProgramDocumentation_PublicReviewDraft10212022_clean.pdf

21 https://www.law.berkeley.edu/wp-content/uploads/2018/09/Implementing-SB-743.pdf

22 https://scag.ca.gov/sites/main/files/file-attachments/ladot-vmt-mitigation-program-factsheet.pdf?1643075436

riparian habitat." The Project is patently inconsistent with Policies OS 11.1, 11.,2, 11.3 and 16.9 regarding solar energy systems.

The Project is also inconsistent with plans and policies aimed at reducing VMT. The Project will result in 213,809 vehicle miles traveled per year; the heavy-duty truck VMT is 91,040. The Project will exceed the City's adopted VMT threshold by 45%. (Draft EIR, Appendix K2) The VMT Technical Analysis (Appendix K2) suggests strategies that should be applied to the Project (pp. 6-7) including to "provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities to the east along 4th Street." This was not adopted for the Project. The Draft EIR's transportation section acknowledges that there no transit stops or bicycle facilities *within the Project vicinity*. (DEIR p. 4.17-2.)

The City has apparently an approved *Policy on Land Use and Sensitive Receptors* which is intended to minimize the effects of warehouses in close proximity to sensitive receptors. This policy includes requirements such as that dock doors shall not be visible from surrounding residential properties; truck bays shall be a minimum of 1,000 feet from the property line of a nearest sensitive receptor; projects shall be designed to ensure adequate on-site queuing; truck driveways shall not front sensitive receptors; that a truck route should be submitted as part of the entitlement package; separate entry and exit points for trucks and passenger vehicles shall be provided to minimize vehicle/truck conflict; pad heights should be varied to provide visual dimension and reduce visible height of a structure; external PA systems are prohibited; wayfinding signage should be posted; a community benefit program shall be funded. (*See* **Attachment B** hereto)[23]. The Project has not evaluated in accordance with this Policy and the Project represents significant conflicts with this Policy.

The EIR must be revised in terms of conflicts with General Plan and other land use policies applicable to the Project. Additional mitigation must be imposed to ensure consistency between the Project and adopted land use plans.

Noise

Construction noise is significant contrary to the EIR's conclusions. The Draft EIR Table 4.13-7 claims a 20 dBA "typical building construction" noise reduction but does not explain why this substantial reduction noise is credited. The Draft EIR's Noise Study (Appendix J) indicates that this 20 dBA reduction is applied "for typical buildings with 'windows closed'," meaning, apparently, that the analysis assumes all residences in the vicinity of the Project site will not experience significant noise impacts because they will have their windows closed Monday through Saturday during the five-year construction period. This raw assumption does not account for homes without air conditioning (in summer months), nor does not account for the fact that people use exterior spaces of their homes (backyards). Nor does it account for the fact that wildlife will experience *unabated* noise during the Project's five-year construction period. Noise has harmful

[23] https://www.beaumontca.gov/DocumentCenter/View/37935/Final-PLUS

effects on wildlife species (see above). The analysis (Table 10-2) indicates significant impacts at "BIO" receivers during construction in particular as to BIO-3 (164 feed southwest of the Project site opposite the planned loading dock area of Building 4). Moreover, all construction noise levels exceed the residential noise standards applicable to the Conserved Area. Noise is very harmful to animal species.[24]

Furthermore, the construction noise analysis apparently does not measure or account for *off-site* construction activities including the extension of 4th Street or encroachments into the Open Space areas that are described in the Draft EIR including the construction of the "manufactured slopes" in these areas (*see* Appendix J, Noise Study Exhibit 10-A). The Project Description notes that off-site improvements include the installation of water, recycled water, and sewer lines, which would occur up to 350 feet east of the Project site in the 4th Street right of way. These activities are not captured by the construction noise analysis in terms of receiver locations. Finally, the construction noise analysis does not account for periods where construction will overlap with Project operations, meaning that noise events will be occurring simultaneously.

In terms of operational noise impacts, "loading dock" activity has a referenced noise level of 65.7 dBA at 50 feet according to the EIR. (Appendix J, p. 57). At 164 feet, BIO 3 can be expected to experience significant noise conditions particularly at nighttime. Indeed, the noise study indicates a significant impact at nighttime with respect to BIO-2 and BIO-3 (46.2 dBA and 50.2 dbA respectively.) This is a significant and unmitigated impact of the Project. Also, there were apparently no "ambient noise levels" taken for the BIO receivers meaning that the Draft EIR does not measure or disclose the *increase in noise* with respect to the conservation area to the south (*see* Tables 9-5 and 9-6).

The City must adopt all feasible mitigation measures for significant noise impacts. For impacts to the conservation area, this includes relocating, shrinking or clustering buildings to allow for more buffering between noise sources and sensitive biological receptors, installing noise absorbing walls, limiting nighttime activities including truck deliveries, prohibiting "PA" systems especially at night, prohibiting the use of generators except in case of emergency, ensuring a daytime schedule for trash compaction and collection, and ensuring lights are dimmed off to the maximum amount or turned off when not in use. (*See* Attorney General *Warehouse Best Practices* "Warehouse Siting and Design Considerations.")[25] *Thousands* of trucks per day are anticipated to arrive at the Project site on a 24 basis, utilizing travel lanes in and around the Project site adjacent to the conserved lands.

For significant traffic noise impacts, again site design measures including reducing the size or number of buildings to reduce the amount of truck traffic is feasible mitigation. Additionally, limiting the hours of operation/deliveries/loading dock activities to daytime hours is another feasible and reasonable means to reduce significant nighttime traffic noise impacts.

[24] https://www.nature.org/content/dam/tnc/nature/en/documents/Shale_Practices_Noise_Control.pdf
[25] https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf

The Draft EIR proposes only *one* noise mitigation measure for significant, long-term noise impacts due to intense industrial operations including significant truck traffic on local roadways. Sierra Club submits that numerous measures are available to reduce noise at the Project site due to Project operations including, for instance, paving roads with low noise asphalt (*see, id.,* p. 9; *see also*[26], [27]). Due to the porous nature of asphalt, this material can reduce roadway noise by 3 dBA to 5 dBA[28] (the Draft EIR dismisses this measure). Also for instance, loading docks can be designed with noise attenuating features such as a foam seal and enhanced bumpers on the deck leveler to reduce "dock mating noise." Ensuring a tight connection between the truck and the building will ensure that all unloading is done directly in the building. Again for instance, a completely roofed loading dock and roll up doors that are closed during trailer unloading would reduce nighttime noise if loading activities are permitted at nighttime. In terms of on-site equipment, all cargo moving equipment shall be installed with self-adjusting "back up" beepers that adapt to the noise environment.[29] [30]

Transportation

Project related traffic will use SR 60 and I-10 in route to/from the Project site via Portero Boulevard and 4th Street. The Draft EIR does not disclose that Project related traffic will contribute to cumulatively significant traffic impacts thereby requiring mitigation, and in fact, no traffic mitigation is required through the CEQA mitigation program. The Traffic Impact Analysis (Appendix K1), however, states:

> 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 cumulative traffic analysis scenarios. As such, the Project Applicant's responsibility for the Project's contributions towards deficient off-site intersections is fulfilled through payment of fair share and/or payment into pre-existing fee programs (if applicable) that would be assigned to the future construction of the identified recommended improvements. The Project Applicant would be required to pay requisite fees and/or fair share contributions consistent with the City's requirements (see Section 10 *Local and Regional Funding Mechanisms*). (*See also* Table 1-4.)

---

[26] https://www.petronaftco.com/asphalt-reduces-noise/
[27] https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/quieter-pavement-a11y.pdf
[28] https://www.sunlandasphalt.com/can-we-reduce-road-noise-by-selecting-a-certain-pavement-type/
[29] https://www.cpwrconstructionsolutions.org/heavy_equipment/solution/792/self-adjusting-and-directional-backup-alarms.html#:~:text=Self%2Dadjusting%20and%20directional%20backup%20alarms%20are%20an%20engineering%20control,the%20vicinity%20of%20the%20vehicle.
[30] https://www.forkliftamerica.com/forklift-backup-alarms/

This is a significant cumulative impact contrary to the conclusions of the Draft EIR. (DEIR p. 4-17.21.) The City must find the impact to be significant. The EIR indicates that a number of intersections will operate at unacceptable levels of service. (See Draft EIR Exhibit 5-7, 5-8, and 5-9.) The EIR indicates a number of needed improvements. (*See* Draft EIR section 5.7.1) The Project is not conditioned to make any fair share payments for needed traffic improvements.

The traffic model assumes that 25% of Project related vehicle traffic will use Portero Boulevard between 4th Street and Oak Valley Parkway thereby passing by existing residences to the west of Portero Boulevard. This is not disclosed in the Draft EIR. The traffic model assumes *no* truck traffic on this same roadway segment although there is nothing preventing or restricting trucks from using this roadway segment for access to I-10. The Project must establish a "Truck Route" to ensure that Project related truck traffic does not use Portero Boulevard north of the "new" interchange to reach I-10. If trucks use this segment of Portero Boulevard they will pass homes/sensitive receptors. The EIR states that the Project is not "anticipated" to use the Beaumont Avenue and I-10 off ramps but there is no designated and enforceable truck route that would prevent trucks from using this off ramp. On the other hand, the analysis appears to assume that Portero Boulevard and I-10 ramps will be utilized by Project trucks. (*See* Table 4.17-3.)

Contrary to the EIR's conclusions, the Project conflicts with General Plan policies related to transportation including Policies 4.1.5, 4.2.2, 4.2.5, 4.4.3, where there is no public transit available at the Project site and the Project proposes none.

In short, the Draft EIR's conclusion that the Project does not result in cumulatively significant traffic impacts is not supported. Table 4.17.3 indicates that the Project results in cumulatively significant impacts to the studied intersections. Therefore mitigation is required.

Wildfire Evacuation

The Project site is in a "Very High Fire Hazard Zone." The Project is designed so that the entirety of the development will rely on 4th Street and an emergency access point for vehicle ingress/egress points. The location of the Project, the design of the Project, and the intensity of development including the commercial component/hotel raises serious issues of fire safety and evacuation risk.

First, the Draft EIR does not demonstrate that fire response times can be met (the City's goal is five minutes, *see* General Plan Update p. 226[31]). The Fire Protection Plan indicates that the closest fire stations are 6.94 and 9.15 minutes from the entrance to the Project site (not the farthest point of the development). (FPP p. 35.) Both are staffed with a single fire engine. Riverside County has also recommended a 5 minute response time (90% of the time) for land uses such as large industrial complexes under the category of "heavy urban". (FPP p. 36.) There is no indication in the record that the Project can meet this 5 minute response time due to its more remote and hillside

[31] https://www.beaumontca.gov/DocumentCenter/View/36923/Beaumont-GPU_Final-rev-22521

location.

The Draft EIR also does not demonstrate that the Project site can be safely evacuated during a fast-moving major fire event. In addition to visitors to the commercial businesses, including the 125-room hotel, the Project is expected to employee roughly 5,500 people. The EIR must demonstrate that the number of persons occupying the Project site at any given time can evacuate in a safe and efficient manner including via 4th Street, that is, whether the capacity of 4th St. can handle the mass evacuation of the site; also the record does not indicate whether nearby roadways (Portero Road) can accommodate evacuating persons including residents of existing neighborhoods and employees and visitors of nearby warehouses assuming 4th Street through to SR 60 is blocked by fire. The Project depends on local roadways for connections to SR 60 which are likely not capable of handling the mass evacuation of the site (the Project apparently only improves 350 feet along 4th Street).

The Draft EIR's Evacuation Study (Appendix M2) indicates that under "Scenario 3" (4th Street) the Project will take approximately 2.5 hours to evacuate, and in combination with the "Hidden Valley Industrial Park" to the west, will take more than 3 hours to evacuate. This must represent a significant impact of the Project in terms of the need for additional fire protection services. The Project's mitigation program does not include mitigation for wildland fire risk impacts.

The Beaumont General Plan requires the preparation of a fire protection and evacuation plan and requires that new development provide two viable points of ingress and egress for emergency vehicles. The General Plan has other policies intended to mitigate fire risk which are not met here. (*See* General Plan Goals 9.4, 9.5, 9.6.) This includes Policy 9.5.2 stating that fire department resources shall be increased to meet the targeted response time of five minutes. Even with the construction of a new fire station as indicated in the Final EIR there is not evidence that fire response time of 5 minutes can be met for the Project. This new fire station was not evaluated through the Draft EIR and there is not evidence in the record that this new fire station will meet fire response times. Nor does the Project appropriately consider the Amazon facilities located on 4th Street.

Finally, the Fire Protection Plan must be made a mitigation requirement of the Project through the CEQA mitigation program. We could not locate the FPP in the conditions of approval or the mitigation program.

Cumulative Impacts

As noted above, a billion square feet of the Inland Empire is devoted to warehouses. In just a few months, the World Logistics Center (WLC) - the 40 million square foot warehouse complex in eastern Moreno Valley - will break ground. The WLC is located only a few miles from the Project site. The WLC is estimated to generate 12,000 daily diesel truck trips with most of them using SR-60 —traveling past the Project. It is also estimated to generate more than 50,000 daily vehicle trips.

The WLC Project has not been included in the Project's cumulative impact analysis. Because the Project will contribute to traffic impacts on SR-60, the cumulative impact analysis must be updated to include forthcoming the WLC Project. (*See attached; see also*, **Attachment C** hereto [map of warehouse development in Inland Empire indicating WLC].)

Growth Inducement

Based on the Project's development pattern and expansion of infrastructure, including roadways and utilities, and given the site's proximity to undeveloped rural residential lands, the Project presents the potential for growth inducing impacts contrary to the EIR's findings. (Guidelines, § 15126 (d).)

Project Alternatives and Findings of Fact

CEQA requires that an EIR 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 and would avoid or substantially lessen any of the significant effects of the project." (Guidelines, § 15126.6 (a).) The "range of alternatives" presented through the EIR do not provide decisionmakers with meaningful alternatives that substantially reduce project impacts and meet most of the basic objectives of the Project. The Reduced Intensity Alternative would still develop 4,000,000 square feet of industrial uses (a total of 4,495,000 sf of industrial development). It would primarily decrease the amount of commercial uses under the Project.

The Draft EIR should evaluate a development alternative with a greater mix of uses, such as business park or professional park uses, to reduce VMT and noise (due to heavy duty truck traffic). Specific plan zoning is an opportunity to create a comprehensive zoning plan for a particular area; and because the Project proposes to entirely redesignate and rezone the properties it is not a foregone conclusion that only industrial uses (with some limited commercial) must be developed. The City should explore a development that truly balances uses to create the type of "transit oriented" development that reduces VMT. The City should also consider an alternative that substantially reduces the amount of industrial development as this is the "primary" development objective of the Project. By reducing industrial development in a meaningful way there is a real opportunity to reduce Project impacts while still providing employment and tax revenue opportunities.

To ensure that alternatives are properly assessed and considered, CEQA "contains a `substantive mandate' requiring public agencies to refrain from approving projects with significant environmental effects if 'there are feasible alternatives or mitigation measures' that can substantially lessen or avoid those effects'." (*County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 98; Pub. Res. Code § 21002.) A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. (Public Resources Code §§ 21081 (a), 21081.5; Guidelines, §§ 15091 (a)(3), 15092.) Rejected alternatives must be "truly infeasible." (*County of*

Marina v. Bd of Trustees of Calif. State Univ. (2006) 39 Cal.4th 341, 369.) Absent findings of infeasibility supported by substantial evidence, the City here must adopt the Reduced Intensity Alternative. The Findings do not demonstrate that this alternative is infeasible. The purported fact that fewer jobs would be created and that the alternative would not meet Project Objectives C, D, and E "to the same extent" as the Project is not a finding of infeasibility of the alternative.

Conclusion

For the reasons above, Sierra Club urges the Council to delay a decision on this Project pending revisions to and recirculation of the EIR as well as the adoption of further mitigation. Thank you for the opportunity to comment on this Project.

Sincerely,

Abigail Smith

Abigail Smith

Enclosure

ENVIRONMENT

Ontario still ‘warehouse king’ in Inland Empire

Large project propels Moreno Valley to No. 2 on consultant’s list of most impacted areas

Traffic flows on Philadelphia Street near warehouses in Ontario last week. An environmental consultant's data shows the region is becoming more saturated with warehouses.

Image 1 of 2

By Jeff Horseman

jhorseman@scng.com

It's easy in the Inland Empire to feel surrounded by warehouses. But where is the logistics footprint the largest?

Mike McCarthy thinks he knows. Using publicly available data, including information from county assessors' offices, the Riverside environmental consultant recently updated his list of the Inland communities with the most square footage devoted to existing and planned warehouses.

The rankings help residents hold accountable the elected officials who make land-use decisions allowing warehouses, McCarthy said.

"Understanding which cities are disproportionately impacted is helpful for local residents to understand where they fit," he said.

McCarthy's rankings, updated from his first list in 2022, paint a picture of a region increasingly saturated with large warehouses, often 1 million square feet or larger.

Thanks to its nexus of freeways and rail lines, proximity to the ports of Los Angeles and Long Beach, an abundance of flat, cheap, available land and a blue-collar workforce, the Inland Empire is a logistics hub supplying Southern California and a nation thirsty for instant delivery of online-ordered goods.

While warehouses employ thousands and provide an economic foundation in a region lacking the high-paying, white-collar jobs of coastal counties, some also blame logistics for a range of health problems associated with toxic

also blame logistics for a range of health problems associated with toxic exhaust belched by warehouse-bound trucks.

Critics also assail the logistics industry for destroying local roads with a seemingly endless stream of tractor trailers and warehouse working conditions described as unsafe and sweltering.

McCarthy, a member of Riverside Neighbors Opposing Warehouses, said he made two changes from his 2022 rankings. He included warehouses that have been planned and approved but not yet built. And he added unincorporated communities that aren't officially part of a city.

Ontario, which was No. 1 in 2022, remains at the top of McCarthy's list.

"Ontario is still the warehouse king of the Inland Empire," McCarthy said.

Moreno Valley, which ranked No. 11 two years ago, is now second.

The biggest factor in Moreno Valley's jump, McCarthy said, is the World Logistics Center, which will feature 40.6 million square feet of warehouse space on 2,610 acres — roughly equal to 700 football fields — once completed.

About 2.6 million square feet of the center has been built and occupied, Eric Rose, spokesperson for the center's developer, Highland Fairview, said via email. Engineering for the next phase of infrastructure is done, with construction expected to start as early as April, he added.

Moreno Valley Mayor Ulises Cabrera said via a text message that, while logistics brings an "economic uplift" to the city, "we must address its impacts on air quality, wages, benefits, and infrastructure strain, particularly affecting our most vulnerable communities."

The city also needs to "pivot" to industries such as "technology, the renewable energy supply chain, manufacturing, artificial intelligence, and health care," Cabrera said.

"This balanced approach aims not only to enhance our economic landscape," Cabrera said, "but also to ensure a higher quality of life, offering residents opportunities that extend beyond living paycheck to paycheck."

Fontana is third on the list. Land controlled by the March Joint Powers Authority, Perris, Rialto, Chino, Jurupa Valley, Beaumont and Rancho

Cucamonga round out the top 10.

One new entry to the top 20 is Menifee, which was not previously ranked. McCarthy said Menifee makes the latest list because "there's just a lot of planned activity going along on (the city's) border with Perris on Ethanac Road."

Redlands did not make the top 20 list.

Some cities rank lower on the list than they did in 2022.

Chino dropped to No. 7 from No. 4, Riverside dropped from 10 to 13, Corona dropped from 12 to 16 and Colton dropped from 15 to 18.

"The biggest trend that I'm seeing is just the continuation of logistics sprawl," McCarthy said. "The cities that are the hotbeds for new activity for the planned warehouses are farther from the ports. We're talking about Moreno Valley, Beaumont, Mead Valley, Temescal Valley (and) Menifee. Those are all 80 to 100 miles from the ports."

McCarthy said he was "a little surprised" to see the biggest changes on his list occurring in Riverside County.

"I don't know if that's just because the San Bernardino County cities are more built out," he said. "But almost all of the big changes happened in Riverside on my list."

The list is sobering to Ana Gonzalez, executive director of the Jurupa Valley-based Center for Community Action and Environmental Justice.

"We feel kind of heartbroken" because the list includes cities where the center has been working with residents to mobilize against warehouse growth, Gonzalez said.

The list also includes communities that are heavily Black and Latino, Gonzalez added. "We just see this perpetration of environmental racism in our communities."

Gonzalez said the list underscores the need for the state government to intervene to stem the tide of logistics development. Politico reported last month that Assembly Speaker Robert Rivas, D-Hollister, asked lawmakers to form a "warehouse working group" to rein in the problems associated with

warehouses in a way that doesn't kill warehouse jobs.

Attachment A

AMPING UP: CHARGING INFRASTRUCTURE FOR ELECTRIC TRUCKS

Widespread innovation and technological advances are producing technologies and practices that could affect decisive, revolutionary, and potentially disruptive opportunities across the transportation industry. As novel concepts, new applications, and original modes of behavior reach the market, fleets and manufacturers need information on the benefits, challenges, and risks so that everyone can profit in this evolving landscape. The North American Council for Freight Efficiency (NACFE) hopes that by fleet managers, manufacturers, and others using its Guidance Reports in the months and years leading to launch, the first generation of production technologies will perform much better and offer higher return on investments.

This report focuses on charging infrastructure considerations for North American commercial battery electric vehicles (CBEVs). In its previous Guidance Reports, *Electric Trucks—Where They Make Sense* and *Medium Duty Electric Trucks—Cost of Ownership*, NACFE found that while the benefits of electric vehicles can be huge, so are the power requirements for charging them. In fact, the previous reports identified charging infrastructure as one of the largest unknowns and sources of anxiety for fleets considering near-term adoption of this technology. NACFE created this Guidance Report to provide unbiased information detailing the multiple factors to consider in infrastructure planning for charging CBEVs. While there

is no “one size fits all” solution to charging, there are common steps and considerations that any fleet considering deployment of electric trucks should undertake in order to ensure they have a complementary and cost-effective charging strategy in place.

This is the third in a series of NACFE guidance reports on electric trucks. It will be followed by Guidance Reports on Class 7 and 8 day cabs and Class 8 long-haul electric vehicles. The goals of this guidance report are to: a) give an overview of electric vehicle supply equipment (EVSE); b) provide information on procuring charging stations and the required electricity; and c) provide common steps and considerations to ensure a complementary and cost-effective charging strategy.

METHODOLOGIES

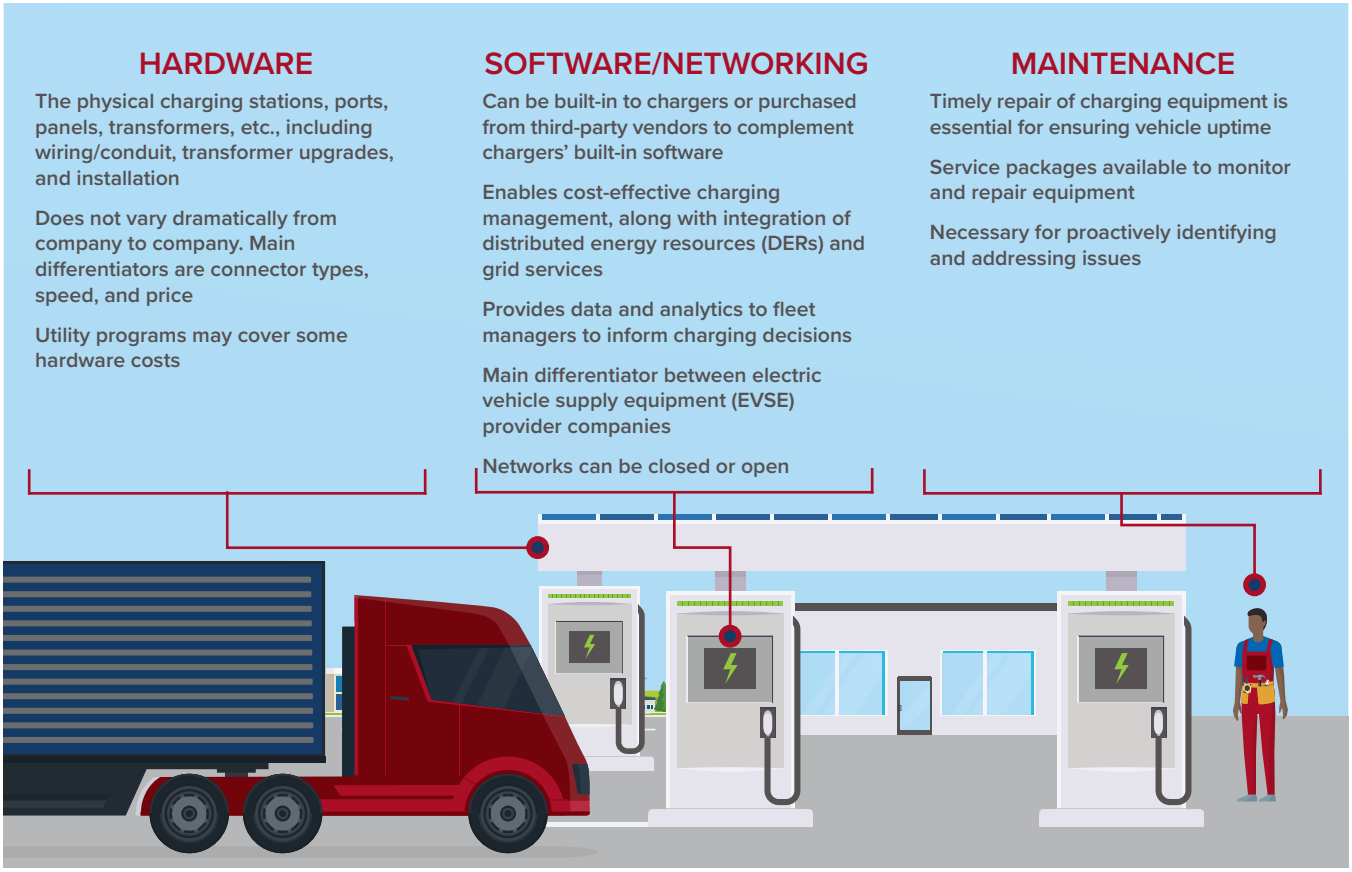
NACFE’s research for this report included interviewing key people with first-hand knowledge of electric vehicle charging infrastructure at fleets, manufacturers, suppliers, utilities, and industry groups. The report includes an extensive list of references to assist readers interested in pursuing more detail. Interviewees were specifically asked what they would want to see in this report and NACFE has taken care to include these wants in the final report. This report builds off the NACFE Guidance Reports: *Electric Trucks—Where They Make Sense*, published in May 2108, and *Medium Duty Electric Trucks—Cost of Ownership*, published October 2018.

SCOPE OF THIS REPORT

The report covers charging considerations for CBEVs currently in production for freight delivery. Because most CBEVs are currently being deployed in the goods movement sector in the medium-duty urban delivery and drayage sectors, much of the best practices and lessons learned come from these applications. And while we touch on considerations for long-haul CBEVs, much of this information is speculative at this point in time as electric trucks have yet to be deployed for this application in any meaningful way.

FIGURE ES1

ELECTRIC TRUCK CHARGING INFRASTRUCTURE COMPONENTS



INFRASTRUCTURE BASICS

ELECTRIC VEHICLE SUPPLY EQUIPMENT

When planning for charging infrastructure, fleets must plan for three separate but related components: hardware, software/networking, and maintenance.

The hardware consists of the electric vehicle supply equipment (EVSE), also known as a charging station, which charges the batteries of electric vehicles. The most common type of EVSE is a plug-in charging station, which plugs into a port on the truck to recharge it. Unfortunately, charging station connecters are not yet standardized, and there are a number of competing charging station connector types throughout the world (e.g., SAE J1772, CCS, CHAdeMO, Tesla, etc.).

It is important to pair electric trucks with the appropriate type of connector. However, standardizing connectors may eventually occur for regional marketplaces as one configuration wins significant market share advantage over others. In the near term, commercial vehicles may be developed with several adapters to deal with various charging station constraints or forced to use proprietary connections and be limited to proprietary charging stations. Similarly, some charging stations offer multiple connector types to ensure usability across different vehicles. The connector choice may not be an issue for fleets with only one CBEV model and with dedicated A-B-A type routes where the vehicle only charges from its home base. However, if a fleet is using competing CBEV models from different manufacturers but wanting to use the same charging system, there may be need for adapters. Thus, for fleets that choose their vehicles first, they will need to know what type of port the truck has in order to plan which charger type(s) to purchase.

An alternative to charging through wires and plugs is termed wireless power transfer (WPT). Wireless charging protocols are in use with automobiles and some buses. Applicability of wireless charging to trucks is being investigated both in static situations where the vehicle is not moving, and in on-road methods were the vehicle is moving. Although static charging presents the least technical challenge for wireless, currently wireless charging technology appears too expensive for the trucking market, with a few exceptions for niche markets. For example, wireless charging may be an opportunity for heavy-duty trucks to charge while they're waiting to pick up loads from ports. It is also being considered as a solution in port applications where union contracts may prevent workers from physically plugging in charging cables. However, some see a bigger opportunity for wireless charging in the trucking sector.

Other charging options include overhead or in-ground conductive charging systems and battery swapping—rapidly charging vehicles by simply replacing the battery packs.

CHARGING SPEEDS

In regard to charging speed, there are three types of EVSEs: Level 1—a 120 Volt home wall outlet, typically only used for light-duty passenger vehicles; Level 2—a 240 Volt charger; and Level 3—DC Fast Chargers (DCFC).

Since a Level 1 charger is not appropriate for charging commercial fleets, fleets will need to decide between Level 2 or DCFC (or a mix of both) in order to keep their vehicles charged. Level 2 chargers can range from $2,000 to $7,000 and offer upwards of 7.2 kW of power, with some now offering over 19 kW. Depending on duty cycle, many fleets that employ "return to base" or "depot" charging find Level 2 EVSEs adequate for charging overnight or during their "dwell time" between shifts.

However, trucks with larger battery packs and/or shorter dwell times may need to consider DCFCs, which are much faster and also much more expensive. Not including installation or any grid/facility upgrades that may be required, current DCFC stations can cost upwards of $15,000 and as much as $90,000. Deciding which level of charging is right for your fleet depends on how many trucks need to be charged, the size of their batteries, and how long they each have to charge.

FIGURE ES2
TYPES OF EVSE (NACFE)

Type of EVSE	Voltage	Power (kW)	Price	Installation Requirements
Level 1	120 V	1.9 kW	Usually included with vehicle purchase (for passenger EVs)	Most plug-in electric light-duty vehicles come with a cord set capable of plugging into a standard home wall outlet, so no additional charging equipment is required
Level 2	208 - 240 V	7.2 - 19.2 kW	A few thousand dollars per charger	Requires installation of charging equipment and a dedicated circuit of 20 to 100 amps
DC Fast Charge (sometimes called Level 3)	Typically 480 V AC input	72 kW–1 MW (in discussion)	$15,000–$90,000 per charger	Requires installation of charging equipment and dedicated circuit

FIGURE ES3

POTENTIAL REAL-WORLD CHARGING SCENARIOS

Truck	Battery Size	Range	Charge Time with Level 2* **		Charging Time with DCFC* ***	
			To 80%	To 100%	To 80%	To 100%
Chanje V8100	100 kWh	150 miles	3–4 hours	4–6 hours	30–40 minutes	1–2 hours
Freightliner eCascadia	550 kWh	250 miles	17–18 hours	23–26 hours	2.5–3.5 hours	4–6 hours

* Assuming 20% state of charge
** Assuming 19.2 kW
*** Assuming 120 kW from charger and that vehicle capable of receiving 120 kW

For example, as shown in Figure ES3, an electric delivery van may be able to recharge its batteries in 4–6 hours using a Level 2 charger, whereas an electric Class 8 tractor may require the same amount of time to recharge using a DCFC.

Note: The estimates in Figure ES3 assume a 20% starting state of charge for the batteries, that the Level 2 charger delivers 19.2 kW, and that the DCFC delivers 120 kW. It also assumes that both vehicles are capable of receiving 120 kW.

"Fast charging is not really an issue for most medium-duty trucks in the US. Most are one-shift operations with lots of time to charge."

–Don Francis, Clean Cities Georgia

CHARGER COMMUNICATION

In order to ensure proper charging, the charger must know how much power to provide and when. This is accomplished via the EVSE protocol, which, on a basic level, is a two-way communication between the charger and the vehicle. It detects the battery's state of charge (SOC) and sets the correct charging current based on the maximum current the charger can provide as well as the maximum current the vehicle can receive. There's also a safety feature that will prevent current from flowing when the charger is not connected to the vehicle or when there is not proper grounding. EVSE is also capable of detecting hardware faults and disconnecting the power in order to prevent battery damage, electrical shorts, or fire.

The EVSE protocol's ability to understand battery SOC also creates opportunities for smart charging systems to prioritize the order of charging vehicles based on where power is most needed to optimize charging from the fleet's perspective rather than by individual truck. For example, a truck with batteries that are 80% depleted will need more power and therefore more charging time than a truck with batteries that are only depleted 30%. Smartly managing these trade-offs and interactions requires appropriate software.

Image courtesy of Wikipedia Commons

CHARGER SOFTWARE AND NETWORKING

Charging software is key for easily and cost-effectively managing fleet charging operations and is now the main differentiator between EVSE provider companies. For example, software is what allows multiple chargers on-site to be able to communicate with one another to optimize sequencing, load management, and variable time of day electricity rates and what ensures that a fleet is charging smartly.

Sometimes, software comes built-in to chargers. Software can also be purchased from third-party vendors to complement the chargers' built-in software. In addition to real-time charging optimization, software is also capable of collecting data and providing analytics to help fleet managers make informed charging decisions.

Most software requires that a charger be connected to a network in order to achieve full functionality. Generally speaking, there are three types of charging station networks: non-networked—typically used in residential applications; closed—which communicate between the charging station and the network server; and open—which allow charging stations to connect to multiple open networks. Particularly when fleets are first dipping their toe into electrification and piloting charging solutions, they may want to opt for open, standards-based networks in case they want to test multiple chargers but manage them all together on one network or in case they want to switch or mix and match chargers in the future.

CHARGER MAINTENANCE

Similar to networking, charging companies may offer very different maintenance packages. These may include services such as proactive monitoring and repair of equipment if needed. Monitoring is important in order to spot and address issues before they snowball into crises. And timely repair of charging equipment is essential for ensuring mission-critical vehicle uptime. Therefore, maintenance packages should be carefully reviewed to ensure they meet fleet needs.

CHARGING LOCATIONS

Charging will roll out in stages, first at a fleets' home depot. Later, fleets may share charging, where a truck goes from its home depot to someone else's home depot, both equipped with chargers. Eventually, remote public charging is expected to emerge on high density freight corridors where distances demand a mid-trip boost or recharge. Charging will evolve as demand grows.

Similar to the personal vehicle market, most commercial vehicles currently charge at "home," or at private, "depot," or "return-to-base" charging stations. Due to the unpredictable "hub and spoke" nature of commercial trucking operations, most fleets currently adopting electric truck technology will want to place chargers at a central home base such as a warehouse, distribution center, or headquarters where trucks start from and return to each day. This type of "return-to-base charging" also makes sense because fleets have full control over site access, charger type, placement, and timing. This may mean redesigning the site, as the vehicles must be co-located with the chargers for some extended period of time to allow charging.

However, charging vehicles at the fleet's base during dwell times between shifts may not be sufficient for vehicles with larger battery packs and/or longer routes. One potential solution, at least for dedicated regional routes, might be to install charging stations not only at the fleet depot, but also at the customer's site(s). This could allow vehicles with relatively long A-B-A routes to charge at point B while unloading, giving them enough of a charge to make it back to their home base for further charging between shifts.

In addition to depot charging, fleets may also consider "opportunity charging" on the road. For example, vehicles may take advantage of the quickly developing public charging network if needed for range extension or in emergencies. However, because of the costs of using public chargers and the uncertainty of availability, vehicles will likely only want to rely on public charging in case of emergency. But knowing that this option exists should relieve some of the "range anxiety" that fleet managers and drivers may feel about potentially running out of power while away from their home base. Regardless of where charging takes place, fleets that invest in charging infrastructure will want to ensure that station utilization is maximized in order to justify the significant expense.

GRID INTEGRATION AND UTILITY BUSINESS MODELS

What is clear, as far as the overall charging system, is that electric trucks will increase demand on electricity. Because of this, grid capacity will need to be improved. New generation may need to be added if increased efficiency in other sectors (buildings, industry, etc.) is not enough to counterbalance the new load from the quickly electrifying transportation sector. Utilities may also need to develop new demand management and/or storage solutions to help balance timing concerns with electricity supply and demand. Similarly, new tariff structures may be necessary in order to encourage smart charging when electricity supply is available, clean, and economical.

Given constraints of the current grid, utilities would prefer that electric vehicles not charge during "peak" times when electricity demand is highest, typically in the late afternoon or early evening when people return home from work and begin doing energy-intensive chores. Rather, utilities are interested in encouraging charging (and other energy-intensive tasks) during "off-peak" hours when the grid has more excess capacity.

The growing demand for electric vehicles combined with state-level greenhouse gas reduction goals and mandates, are causing some utilities to rethink their tariff structures and even to design new tariffs specifically to support EV charging for commercial and industrial customers. This includes implementing time-of-use rates, in which utilities charge a different rate for on-peak versus off-peak times, or demand charges, which allow utilities to charge customers based on their individual peak demand or highest use in a given timeframe. Because of this dynamic, fleets with flexible operations or operations that allow for trucks to be charged at night will likely find charging to be more economical than fleets that may need to charge during the day or all at once to support mission critical operations. However, this dynamic will vary by region and by utility.

Because many utilities earn a profit based on a "cost-of-service" business model that guarantees a "rate of return" on the company's assets or "rate base," utilities are incentivized to build the necessary infrastructure to support transportation electrification, a trend which will likely require them to invest in new assets and therefore earn more profits. With this information in mind, fleets should not be shy in demanding reasonable support and accommodations from utilities to support vehicle charging.

PROCURING CHARGING INFRASTRUCTURE AND ELECTRICITY

There are two main business models for procuring charging stations and associated infrastructure. The most common is by buying the stations outright, often through a request for proposal process. In this scenario, fleets may hire a consultant to help make these decisions and set up the infrastructure (and potentially also help manage the relationship with the utility), but in the end, the fleet owns and manages the chargers, which are then considered a capital expense.

The other way is through leasing in which the supplier owns the stations and the fleet simply pays a fee for using them. This model allows the fleet to pay for the stations out of their operational expense budget. In both the lease and own options, fleets often pay charging suppliers not just for the physical stations but also for access to their fleet management networks, which again, are a recurring operational expense.

Other innovative business arrangements may be possible, including third parties that step in with capital to create turnkey systems, with various usage rates that could remove the site owner from the complexity of managing part or all of the charging system. Those third parties, similar to an energy service provider in the buildings sector, may specialize not just in infrastructure procurement and installation, but also in optimizing charging, which can have large financial implications. Especially for fleets with little experience or interest in optimizing charging, this sort of "charging-as-a-service" model can be a good option since these third-party companies specialize in this area and therefore may be better able to maximize efficiency and avoid load spikes and demand charges.

ELECTRICITY BUSINESS MODELS

Just as there are various ways to procure the charging infrastructure, there are also various ways to procure the electricity. Most fleets procure electricity the traditional way—through the local utility's electric grid. Depending on whether the region is a regulated or deregulated electricity market, fleets may have options with respect to which company they buy their energy from. In thinking through electricity pricing, fleets must be aware of their utility's rates and if and how demand charges are integrated into those rates.

Fleets can also get their electricity from on-site "behind the meter" solutions such as microgrids and renewables like solar PV. However, integrating systems like these into electric fleet charging systems is a very new concept and no data is yet available as far as best practices.

FINANCIAL ASSISTANCE

Fortunately for fleets, depending on the location and project, there are a myriad of financial assistance programs available to help make vehicle electrification more economically feasible. While some of these funding mechanisms are focused more on the vehicles themselves, some can also help cover the cost of charging infrastructure.

Utilities are typically aware of any financial incentives offered within their service territory, so speaking with a utility representative is usually a good place to start. There are also directories available online that allow fleets to search for funding support by location.

IMPLEMENTATION STEPS AND CONSIDERATIONS

Fleets planning for vehicle electrification must consider many variables for implementation. And while each project by necessity involves some bespoke engineering (since each site and project is different), there are some common factors to consider. A suggested chronological roadmap, including key considerations is outlined in Figure ES3.

The roadmap will have the same general steps regardless of number or size of trucks; however, as fleets scale the number of electric vehicles at each site, the charging procurement process will become exponentially more complex and time-consuming.

FIGURE ES4
CHARGING PROCUREMENT ROADMAP

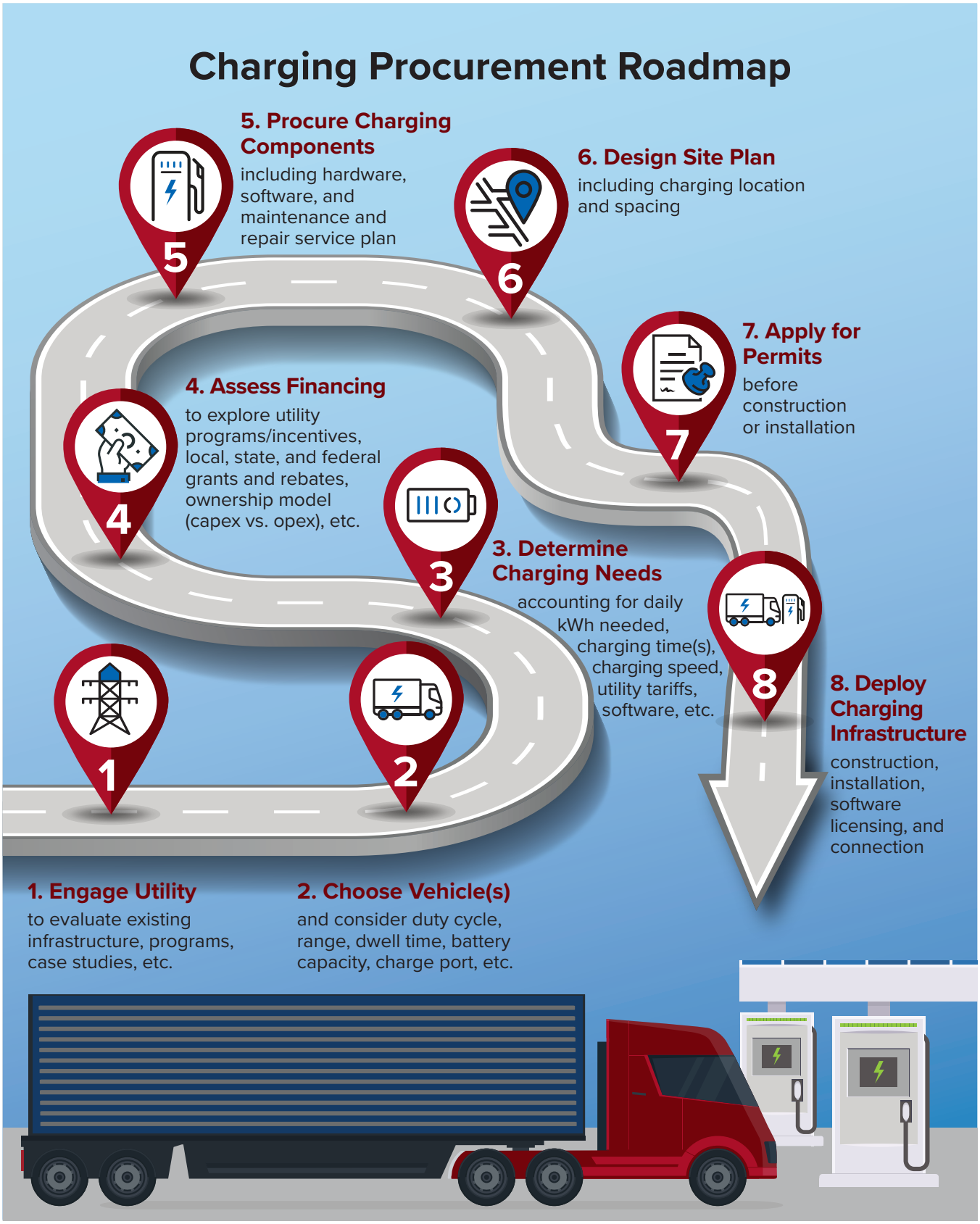
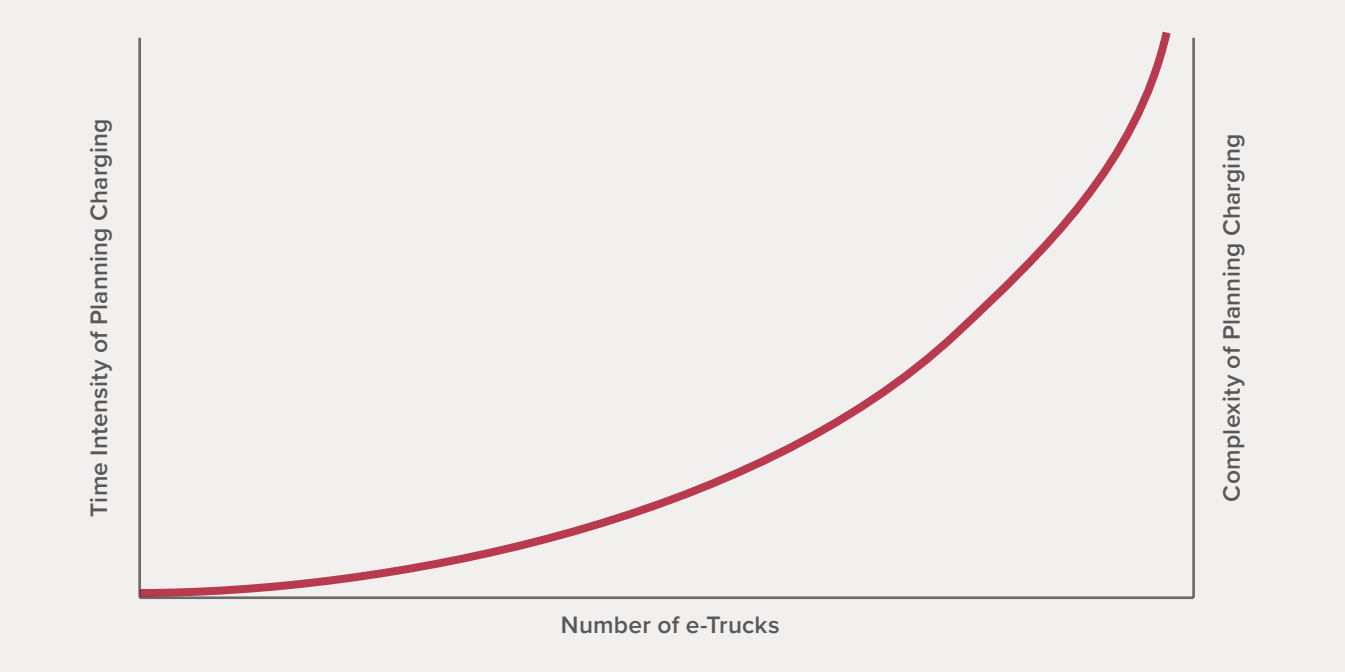


FIGURE ES5
CHARGING IMPLEMENTATION COMPLEXITY



This implementation process may be lengthy, but as more fleets and utilities gain more and more experience, this process will become more streamlined as a common "cookbook" approach evolves.

ADDITIONAL CONSIDERATIONS

In addition to the opportunities and challenges mentioned above, other considerations to take into account when planning for charging infrastructure include employee safety, fueling schedules and operator time requirements, scaling, grid services, integrating renewables, workforce dynamics, ratepayer benefits, and utility business model reform.

"Every charging installation faces a variety of variables—number of trucks to charge, local utility rate tariffs and power delivery structure, existing site and local grid details. There are no rules of thumb."

–Chris Nelder, RMI

Image courtesy of National Renewable Energy Laboratory

CONCLUSION AND RECOMMENDATIONS

NACFE's research into charging infrastructure for commercial battery electric vehicles to date has revealed the following:

- The focus for the foreseeable future of electric truck charging will be on private, "depot," or "return-to-base charging."
- Planning and permitting for charging infrastructure can be a time-intensive process, so fleets should appreciate lead times and start early.
- Fleets planning to electrify some or all of their vehicles should work closely with their local utility, regulators, cities, neighbors, OEMs, and charging system providers.
- Fleets should focus on differentiating products and companies based on their software, network, and maintenance offerings, and should ensure that they are comparing apples to apples during the procurement process.
- Fleets must develop a fairly sophisticated understanding of the existing electric infrastructure and demand, their electricity rates, and the types, number, duty cycles, and time available for charging of their vehicles—or contract a third party to do so for them.
- Fleets should plan on a site-by-site basis since charging infrastructure is not one size fits all.
- Fleet electrification will happen most where special programs are implemented to help mitigate hardware, installation, and electricity costs, at least in the initial stages of technology adoption.
- Fleets should consider investing in smart, networked charging software and services, particularly for deployments of multiple vehicles and/or vehicles with large battery capacities.
- Fleets should demand improvements from technology providers and utilities and inform them quickly of all dissatisfactions.
- As all new technologies go through learning curves, fleets should not make rash conclusions in the first months or year of operation, but realize that solutions will be iterative as experience amasses.

Fleets as well as utilities, regulators, and technology providers are constantly learning and developing in this rapidly evolving space. And innovative utility programs and rate structures are allowing commercial battery electric vehicles to charge successfully and economically in growing areas of the country. However, much broader and faster design and approval of these sorts of programs by utilities and regulators is needed in order to scale electric vehicle adoption across the nation. As much as possible, EV-friendly programs and rate structures should be standardized so that fleets with operations that span multiple utility service territories can scale their electrification efforts without having to reinvent the wheel in each new territory. It's important to remember that utilities are relatively new to the EV charging space, and that although it will require a significant departure from their historical rate structures and business models, it is in their financial interest to support the build-out of charging infrastructure because it offers additional rate-basing investments and load growth opportunities in an otherwise plateauing market.

It is also imperative that utilities understand the important differences between passenger EVs and commercial EVs. Not only is the charging capacity much higher for CBEVs, but they have unique needs and constraints due to their mission-focused operations, which are much less flexible than personal vehicle usage and charging times. As such, CBEVs need to be looked at as a distinct market rather than an extension of the passenger EV market.

"In order for electric trucks to scale, we need both the truck and the ability to charge it. The three keys to infrastructure deployment are standardization, collaboration for construction, and teaming with utility companies for the efficient delivery of electricity."

–Gary Horvat, VP of eMobility, Navistar, Inc.

While the charger itself is the most visible piece of the charging infrastructure ecosystem, fleets must focus more on the big picture than on simply comparing EVSEs. We expect more and more innovative networking and maintenance options to arise. Software will be invaluable as smart charging will be key to minimizing costs while also ensuring mission critical uptime of vehicles. Many business models exist to help manage charging, and fleets will need to decide what trade-offs they're comfortable making between risk management and price volatility. Fleets that develop expertise in smart charging will have a leg up on their peers, though innovative partnerships will allow even fleets new to the electrification space to be successful.

Smart charging and vehicle-to-grid capabilities may also enable new grid services that, if compensated for appropriately, may be a win-win-win for utilities, fleets, and ratepayers. That said, it is imperative that these services are piloted in the real world for further refinement, as they are mostly hypothetical today.

Last but certainly not least, charging infrastructure, though no doubt not sufficient today, should not be considered an insurmountable problem. Thomas Edison's first patent for the light bulb was filed in 1879 well before there was a North American power grid. Light bulb and electric motor technology ignited national development of new infrastructure to adapt society to the new technology rather than forcing the technology to fit poorly into the existing infrastructure. The power grid infrastructure was demand driven based on success of the electric devices that needed it. This lag between product introduction and infrastructure investment has been repeated many times, and there's no reason to think it won't be repeated for CBEV charging infrastructure as well.

THE FULL REPORT

The full report is available at www.nacfe.org and includes 160 references; a robust, current, relevant bibliography of charging infrastructure works; appendices that list charging infrastructure suppliers and utilities with electric truck charging programs; and 91 figures. See the Table of Contents below for more information on the full report:

NACFE

The North American Council for Freight Efficiency (NACFE) is a nonprofit organization dedicated to doubling the freight efficiency of North American goods movement. For the past 10 years, NACFE has operated as a nonprofit in order to provide an independent, unbiased research organization for the transformation of the transportation industry. Data is critical and NACFE is proving to help the industry with real-world information that fleets can use to take action. In 2014, NACFE collaborated with Carbon War Room, founded by Sir Richard Branson and now a part of Rocky Mountain Institute (RMI), to deliver tools and reports to improve trucking efficiency. These reports include a series of Confidence Reports that detail the solutions that exist, highlight the benefits and consequences of each, and deliver decision-making tools for fleets, manufacturers, and others. As of early 2019, NACFE and RMI have completed 18 such reports covering nearly all the 85 technologies available.

www.nacfe.org

ROCKY MOUNTAIN INSTITUTE

Rocky Mountain Institute (RMI)—an independent nonprofit founded in 1982—transforms global energy use to create a clean, prosperous, and secure low-carbon future. It engages businesses, communities, institutions, and entrepreneurs to accelerate the adoption of market-based solutions that cost-effectively shift from fossil fuels to efficiency and renewables. RMI has offices in Basalt and Boulder, Colorado; New York City; Washington, D.C.; and Beijing.

www.rmi.org

GET INVOLVED

Trucking Efficiency is an exciting opportunity for fleets, manufacturers, and other trucking industry stakeholders.

Learn more at: www.nacfe.org

Or contact: Mike Roeth at mike.roeth@nacfe.org

Attachment B

Policy on Land Use and Sensitive Receptors

Purpose

For the past decade, the City of Beaumont was one of the fastest growing cities in the region. The City's proximity to Los Angeles, Orange and San Diego counties, the availability of affordable land and high quality of life have all contributed to making Beaumont an attractive place to live and work. The continuing rate of growth in Beaumont and in the larger region exceeds the capacity of the City's financial resources to meet the needs for transportation infrastructure. Warehousing, logistics, e-commerce and distribution are established sectors of the Inland Empire economy and are increasing in the City of Beaumont. These uses contribute to local job growth and continue to expand based on trends in e-commerce. Due to the City's location, providing direct access to I-10, SR-60 and SR79, it is anticipated that strong demand for growth in the logistics industry will continue.

The City recognizes construction and operations of logistics, warehouses and other similar types of projects in close proximity to sensitive land uses or sensitive receptors, negatively affects quality of life. ***Sensitive receptors generally include residences, schools, parks, playgrounds, community centers, assisted living, day care centers, nursing homes, hospitals, and similar uses.*** The City of Beaumont has all of these types of sensitive receptors and additionally has several active-55+ communities.

This policy is intended to provide a guide through which logistics, warehouses and similar projects can be planned in a way that lessens their impact on the community and the environment. This policy will aid in minimizing potential impacts to sensitive receptors by acknowledging the City's existing General Plan and zoning which provides location and standards for development of these types of projects and California Environmental Quality Act (CEQA) project analysis. This policy does not exempt a project from preparation of the appropriate environmental review and application of any necessary measures that may arise as a result. This policy provides criteria which shall be implemented to supplement project-level mitigation measures, to further reduce impacts related to logistics, warehousing and any project of similar size or type of development.

The application of this policy is intended to be included in the evaluation of and conditions of approval for individual development projects. This will provide standards for which applicants and the public can look to and will provide an opportunity for City staff to monitor individual conditions of approval. The policies are organized into specific categories, to address potential quality of life issues from initial design to construction and operations.

Applicability

The policy guidelines apply to new projects submitted after the policy approval date and will be implemented during the development review process.

This policy applies to logistics, warehouse and similar projects that include any building larger than 100,000 square feet in size or type. It is intended to provide a general guidance that will be appropriate for most industrial or logistics, warehouse or similar projects. Project-level review under CEQA applies to any project,

regardless of square footage and may include any technical reports including, but not limited to noise, greenhouse gas, air quality, and traffic. The Planning Department shall use this policy to review projects and in instances where a project does not conform to the policy shall document findings to be considered by the Planning Commission and City Council.

Analysis

1. An "Air Quality" study shall be prepared in accordance with CEQA and the South Coast Air Quality Management District (SCAQMD) guidelines which includes both project specific and cumulative impact analysis.

2. A "Health Risk Assessment" shall be prepared in accordance with CEQA and the South Coast Air Quality Management District (SCAQMD) guidelines when a proposed project meeting the criteria of this policy is located within 1,000 feet of a sensitive receptor.

3. A "Noise Impact Analysis" shall be prepared in accordance with CEQA guidelines to assess potential impacts to the neighboring properties and surrounding community.

4. A "Construction Traffic Control Plan" shall be prepared, reviewed and approved prior to issuance of a grading permit, which details the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations.

5. A "Traffic Study" or "Traffic Impact Analysis" shall be prepared in accordance with CEQA, analyzing both Vehicle Miles Traveled (VMT) and Level of Service (LOS) C as allowed by the City's General Plan. The study shall identify improvements and fair share costs for the project.

6. A stacking or queuing study shall be provided as part of the project review. The study shall identify the necessary on-site queuing area so vehicle and truck traffic waiting to access the site shall not extend into the public right-of-way.

7. A "Water Supply Assessment" shall be prepared as part of the environmental review process.

8. A "Sewer Study" shall be prepared as part of the project review process.

9. An "Economic Impact Study" shall be prepared as part of the project review process. At a minimum, the study shall provide a cost for service analysis, estimate of revenue generated, anticipated property tax revenue and any other information necessary to provide a comprehensive evaluation of the fiscal impacts to the City.

10. An "Energy Efficiency Plan" shall be prepared as part of the project review process which shows how the project will encourage efficiency above and beyond Title 24 requirements.

Construction Phase

1. During construction of the project, all copy of current California registration for each piece of construction equipment accessing the site shall be provided to the City. If equipment is not registered in

California proof of CARB-Compliant engines or newer as identified by the most current CARB engine standards shall be provided.

2. Construction contractors shall locate or park all stationary construction equipment away from sensitive receptors nearest the project site.

3. The surrounding streets shall be swept on a daily basis to remove any construction related debris and dirt.

4. Dust control measures meeting SCAQMD standards shall be implemented for all land disturbance and construction activity.

5. All Water Quality requirements and best practices shall be adhered to throughout the construction phase.

6. Construction contractors shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

7. During construction, a City representative shall conduct an on-site inspection with a project representative to verify compliance with these policies, and to identify other opportunities to reduce construction impacts.

Siting and Design

1. Truck bays and loading docks shall be a minimum of 1,000 feet, from the property line of the sensitive receptor to the nearest dock door using a direct straight-line method. This distance may be reduced if the site design includes berms or other similar features to appropriately shield and buffer the sensitive receptors from the active truck operations areas. Dock doors shall not be visible from surrounding residential properties or the public right-of-way. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design.

2. Projects shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks not visible from sensitive receptors. Commercial trucks shall not be parked in the public right-of-way or nearby residential areas. Queuing shall not extend into the public right-of-way.

3. Truck driveways shall be placed on streets that do not front sensitive receptors.

4. Sites shall clearly mark entry and exit points for trucks and service vehicles.

5. Facility operators shall establish specific truck routes between the facility and regular destinations, identifying the most direct routes to the nearest highway/freeway and prohibit traveling near sensitive receptors or through residential neighborhoods. The truck route should be submitted as part of the entitlement package.

6. Separate entry and exit points for trucks and passenger vehicles shall be provided to minimize vehicle/truck conflict.

7. Sites shall be densely screened with landscaping along all bordering streets and adjacent sensitive receptors, with trees spaced no further apart than 25 feet on center. Trees utilized in landscape screening shall be a minimum of 36-inch box. A permanent maintenance mechanism shall be approved as part of the entitlement process to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan.

8. A "wing-wall" shall be installed perpendicular to the loading dock areas to further reduce truck or operational noise and to serve as an aesthetic screening feature for the loading area when adjacent to sensitive receptors.

9. All project lighting shall comply with the City's "Dark Sky Ordinance", Beaumont Municipal Code Chapter 8.50 Outdoor Lighting. Lighting shall be shielded and directed down to the interior of the site and not spill over onto adjacent properties.

10. Project facilities shall install electrical panels and conduit to facilitate future electrical connections, to eliminate idling of main and auxiliary engines during the loading and unloading process. At all cold storage facilities electrical connections shall be provided to each dock.

11. Facility construction and operational noise shall comply with Beaumont Municipal Code Chapter 9.02 Noise Control.

12. Sites shall be designed to significantly minimize aesthetic impact and structures shall have a neutral palette, blending in with the surrounding environment.

13. Any mechanical or structural equipment or components located on the exterior of the building shall be screened from view and enclosed to protect the equipment and deter vandalism.

Operation

1. Facility operators shall prohibit truck drivers from idling more than five (5) minutes and require operators to turn off engines when not in use, in compliance with the California Air Resources Board regulations.

2. Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.

3. On-site equipment shall be compliant with CARB and SCAQMD regulations.

4. Facility operators shall require all drivers to park and perform any maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.

5. Facility operators for sites that exceed 250 employees shall establish a rideshare program, in accordance with AQMD rule 2202, with the intent of discouraging single-occupancy vehicle trips and promote alternate modes of transportation, such as carpooling and transit where feasible.

6. A minimum of 5% or as required by the Cal Green Code, whichever is greater of employee parking spaces shall be designated and infrastructure installed and operational for electric or other alternative fueled vehicles.

7. Externally announcing public address (PA) system are prohibited with the exception of emergency notifications.

8. Facility operational noise shall comply with Beaumont Municipal Code Chapter 9.02 Noise Control. Any ongoing operational noise shall be evaluated through the CEQA process.

Wayfinding

1. Wayfinding signs shall be posted in the appropriate locations that trucks should not idle for more than five (5) minutes and that truck drivers should turn off their engines when not in use.

2. Wayfinding signage shall be posted in the appropriate locations that clearly show the designated entry and exit points for trucks, service vehicles and passenger vehicles.

3. Signs stating parking and maintenance of all trucks is to be conducted within designated areas and not within the surrounding community or on public streets shall be posted in the appropriate locations.

4. Signs should be posted in the appropriate locations and handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services, if these services are not available onsite. The facility operator shall also email this information to drivers expected to visit the site, 24 hours in advance of their arrival.

5. Each facility shall designate a point of contact responsible for implementing the measures described herein and/or in the project conditions of approval and mitigation measures. Contact information should be provided to the City and updated annually, and signs should be posted in visible locations providing the contact information for the point of contact to the surrounding community. These signs shall also identify the website and contact information for the South Coast Air Quality Management District.

6. Signage shall comply with the City's Sign Ordinance, Beaumont Municipal Code Chapter 17.07 Signage, which may be amended from time to time.

Community Benefit

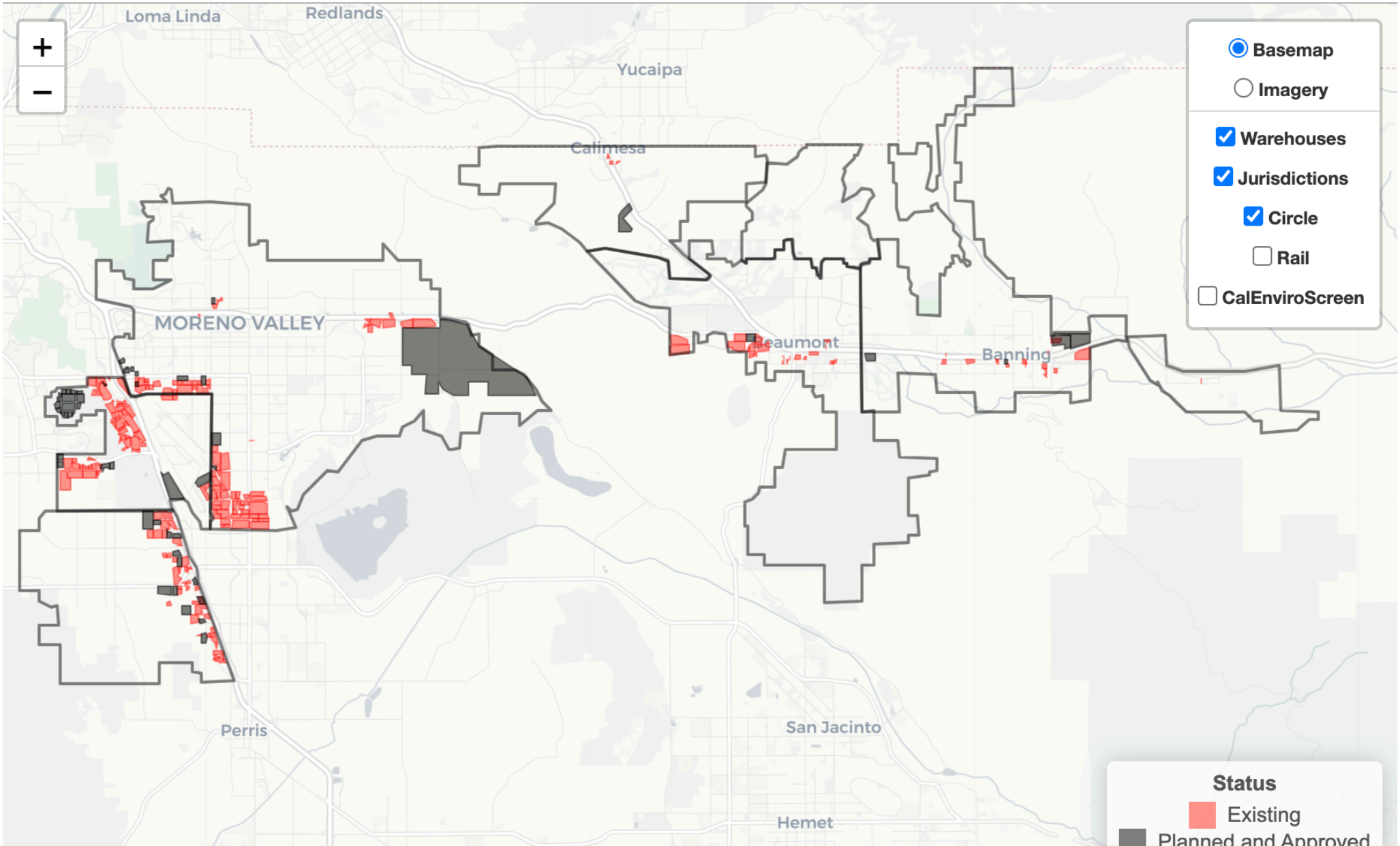
1. Applicants for proposed projects meeting the criteria for this policy shall engage in meaningful and transparent community outreach to engage the existing community in determining issues of concern. The applicant shall make a quantifiable effort to address concerns through site design and other means during the project entitlement process. Suggested outreach efforts include but are not limited to, hosting community meetings, making presentations at Homeowner's Association meetings, and Planning Commission workshops.

2. Warehouse/distribution, logistics, e-commerce and other similar types of industrial development typically produce some community impacts related to the construction and operation of these facilities. The

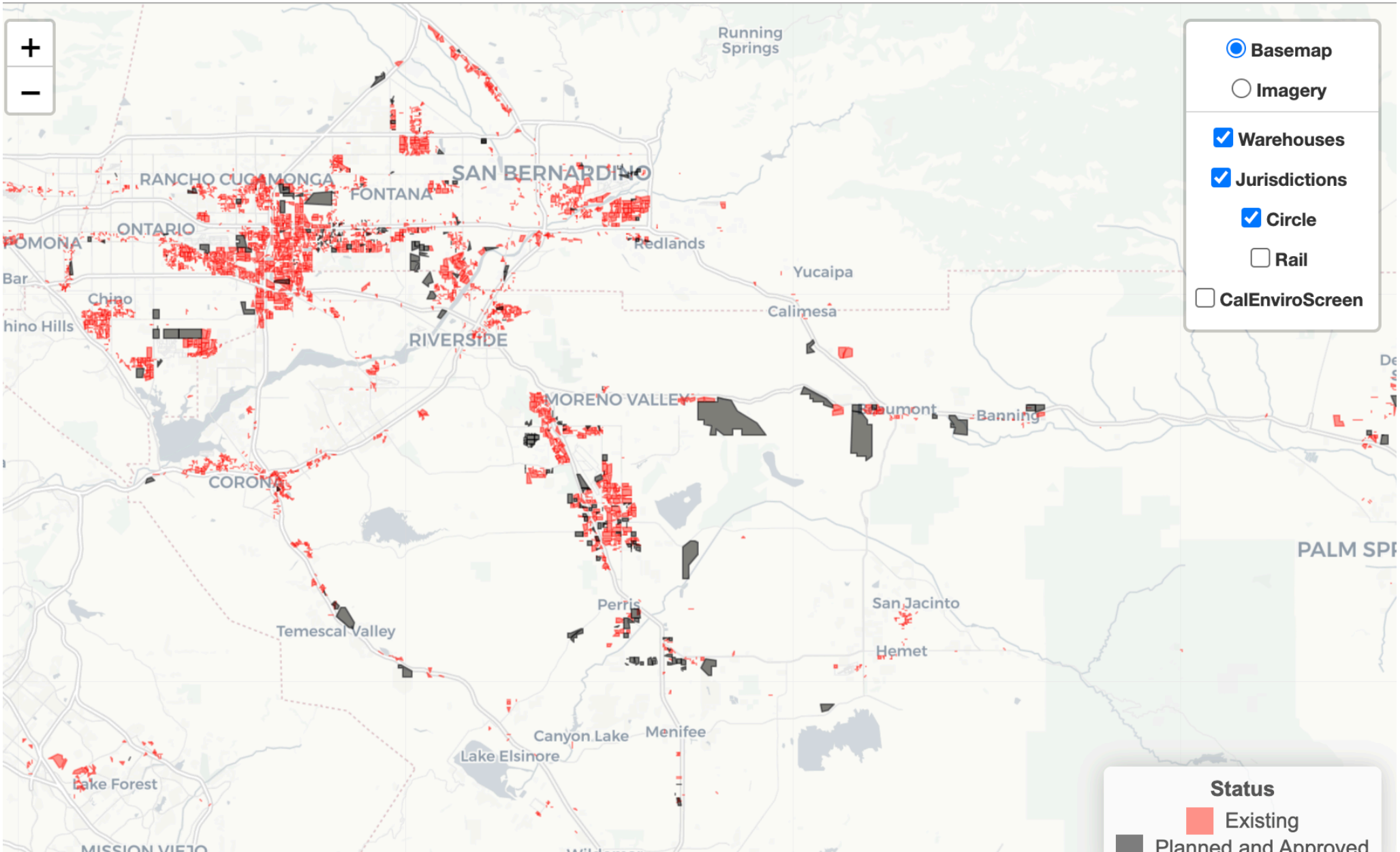
applicant for any new project will be required to participate in the Land Use Management Mitigation Fee, which would be utilized to address applied to further off-set potential air quality impacts to the community and provide a community benefit above and beyond any CEQA related mitigation measures. The fee would be based on a nexus study and subject to the requirements of California Government Code sections 66000-66025 (the “Mitigation Fee Act”), and Assembly Bill (AB) 1600. The fee will be collected on a one-time basis. Funds collected through the fee program will be subject to designation for use by the City Council and will generally be used for projects that directly benefit the impacted community wherein the project is located

Attachment C

Category	Warehouse count	Acreage	Warehouse floor space (Sq.Ft.)	Daily Truck trips	Daily Diesel PM (pounds)	Daily NOx (pounds)	Daily CO2 (metric tons)	Jobs
Existing	231	3,774	90,400,000	61,000	84.4	9,504	2565.5	30,192
Planned and Approved	55	3,972	95,200,000	64,000	88.5	9,971	2691.7	31,776



Category	Warehouse count	Acreage	Warehouse floor space (Sq.Ft.)	Daily Truck trips	Daily Diesel PM (pounds)	Daily NOx (pounds)	Daily CO2 (metric tons)	Jobs
Existing	9,011	59,202	1,418,400,000	950,000	1314	148,010	39954.2	473,616
Planned and Approved	377	18,307	438,600,000	294,000	406.7	45,805	12364.8	146,456



From:	Nicole Wheelwright
To:	Carole Kendrick
Subject:	FW: Beaumont Pointe Specific Plan South of SR 60 in Beaumont Sphere of Influence
Date:	Wednesday, January 31, 2024 11:35:14 AM
Attachments:	Outlook-5hoe3fb0.png

Carole,

For your public input file.

NICOLE WHEELWRIGHT
Deputy City Clerk, MMC

City of Beaumont
550 E. 6th Street, Beaumont, Ca 92223
Desk (951) 572-3196 |

From: Elaine Morgan <emorgan@beaumontca.gov>
Sent: Tuesday, January 30, 2024 5:00 PM
To: Nicole Wheelwright <NWheelwright@beaumontca.gov>
Subject: Fw: Beaumont Pointe Specific Plan South of SR 60 in Beaumont Sphere of Influence

Public Comment

Elaine Morgan

City Clerk

City of Beaumont

550 E. Sixth Street, Beaumont, CA 92223-2253

Main (951) 769-8520

EMorgan@BeaumontCA.gov

BeaumontCa.gov

Facebook | Twitter | Instagram | YouTube

From: srjoel@verizon.net <srjoel@verizon.net>
Sent: Tuesday, January 30, 2024 3:34 PM
To: Elaine Morgan <emorgan@beaumontca.gov>; Jessica Voigt <jvoigt@beaumontca.gov>; Lloyd White <LWhite@beaumontca.gov>; David Fenn <dfenn@beaumontca.gov>; Mike Lara <MLara@beaumontca.gov>; Julio Martinez <jmartinez@beaumontca.gov>; AJ Patel <apatel@beaumontca.gov>
Subject: Beaumont Pointe Specific Plan South of SR 60 in Beaumont Sphere of Influence

I would like it to be noted that I am in opposition to the Beaumont Pointe Specific Plan South of SR 60 in Beaumont Sphere of Influence where a developer wants to build 5 million square feet of warehouses over 540 acres of land.

Unfortunately, the city scheduled the first Planning Commission Hearing during the Thanksgiving Holiday, when families would rather gather together and celebrate with each other, rather than sift through hundreds of pages of fairly dry and technical documents. Consequently, it was not convenient for many to attend this meeting to voice their concerns. And, unfortunately, the Planning Commission approved this project 3-1.

I am asking the city council to vote to deny the project.

From: David Castillo
To: Christina Taylor
Subject: Oppose this project!
Date: Wednesday, March 13, 2024 9:02:00 PM

March 19th: Beaumont Pointe Warehouse Project: 5 million sq.ft. of warehouses will be on the Beaumont City Council Agenda: Meeting Starts at 6pm:

Why is this a bad project:

Traffic:
- Project will cause Level of Service levels to reach F grade.
  Level or Service (LOS) are "graded" and grades range from A grade (free flowing) to F grade (bumper-to-bumper standstill traffic)
  standstill)
- Intersections that will reach F levels:
  - Desert Lawn Dr. & Oak Valley Parkway.
  - Potrero Blvd & Oak Valley Parkway
  - Potrero Blvd & Western Knolls Ave.
  - Potrero Blvd & 4th St.
  - I10 Eastbound Ramps & Oak Valley Parkway
  - I10 Westbound Ramps & Oak Valley Parkway
  - Veille Ave & 4th St.
  - California Ave & 6th St
  - California Ave & 5th Street
  - California Ave and 4th Street

There's no adequate mitigations that prevent big-rig diesel truck traffic from flooding onto nearby arterials and their neighborhoods, such as Potrero Blvd, Oak Valley Parkway, California Ave. First Street (all the way to Highland Springs Blvd), SR 79, Pennsylvania Avenue, Beaumont Ave. etc.

Poor Employment Prospects:
Prospects for high quality employment for Beaumont Youth will not exist:
- Average salary is $33,000
- Average turnover rate is 107%, meaning almost all workers quit in less than one year.
- Working environment/conditions are known for being unsafe/uncomfortable (No HVAC or heating), injuries, illness).
- How will Beaumont Youth be able to afford buying a house with these wages.
- As of 2023 over 1/2 of city's workforce (6300) is already dependent on warehouse workers. If Beaumont becomes a warehouse town (like a factory town) if warehouse industry suffers a downturn (which is underway), many workers will laid off causing burden on local government resources)
- Most warehouses are headed towards automation.

Sales Tax Revenue is not reliable/sustainable revenue source.
- Sales tax revenues fluctuate based on economic factors
- Recent downturn in warehouses has caused increased vacancy rates and layoffs.
- Not all warehouses generate sales tax revenues.
- Beaumont will not keep all of its sales tax revenues due to allocation formulas.

There are many more reasons why Beaumont Pointe Warehouse project is a very bad idea, and bad for Beaumont's

long term future.

Voice your objections by:
- Emailing Christina Taylor (make sure to reference Beaumont Pointe) at:
  Christina Taylor
  Deputy City Manager
  City of Beaumont
  email: ctaylor@beaumontca.gov

- Attend City Hall meeting on March 19th an voice your objections: Starts at 6pm:
  Beaumont City Hall
  550 E. 6th Street, Beaumont, Ca 92223

- Call in with your objections: Please use the following phone number to join the call (951) 922 - 4845.

Tell the city council to deny this project.

David Castillo
Riverside Co resident
Sent from my iPhone