"ATTACHMENT I"

Findings of Fact and Statement of Overriding Considerations for the:

Beaumont Pointe Specific Plan Project

State Clearinghouse No. 2020099007

Lead Agency
City of Beaumont
550 East 6th Street
Beaumont, CA 92223

CEQA Consultant
T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

Lead Agency Discretionary Permits
General Plan Amendment PLAN2019-0284
Pre-Zone PLAN2019-0283
Beaumont Pointe Specific Plan SP2019-0003
Beaumont Pointe Sign Program PLAN2022-0856
Vesting Tentative Parcel Map No. 38161 PM2022-0012
Development Agreement PLAN2023-0906
Minor Amendment to the Western Riverside County Multiple Species Habitat Conservation Plan

March 2024

"ATTACHMENT I"

Table of Contents

Section **Page**

Attachments

Exhibit A – Fiscal Impact Analysis

"ATTACHMENT I"

1.0 INTRODUCTION AND PURPOSE

The 539.9-acre Project site, as described under Section 1.2.1 below, is in unincorporated Riverside County at the western edge of the City and in the City's sphere of influence. The City of Beaumont (the "City") in approving the Beaumont Pointe Specific Plan Project (the "Project") makes the Findings described below. The Findings are based upon the entire record before the City, as described in Subsection 1.3 below, including the Environmental Impact Report ("EIR") prepared for the Project with the City acting as lead agency under the California Environmental Quality Act ("CEQA").

Hereafter, the Notice of Preparation ("NOP"), Notice of Availability ("NOA"), Draft EIR ("DEIR"), Technical Studies, and Final EIR ("FEIR") (containing responses to public comments on the DEIR and textual revisions to the FEIR), will be referred to collectively herein as the "EIR" unless otherwise specified.

1.1 FINDINGS REQUIRED UNDER CEQA

Public Resources Code Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]" The statute also provides that the procedures required by CEQA are "intended to assist public agencies in systematically identifying both the significant effects of projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." Finally, Section 21002 indicates that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The mandate described in Public Resources Code Section 21002 is implemented, in part, through the requirement that for projects with one or more significant environmental effects, agencies must adopt written findings before approving projects for which EIRs are required. For each significant environmental effect identified in an EIR for a project, the approving agency must issue a written finding reaching one or more of three permissible conclusions. The first such finding is that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. The second finding is that such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. The third finding is that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the EIR (CEQA Guidelines Section 15091). Public Resources Code Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, legal, and technological factors." As stated in CEQA Guidelines Section 15093 (a), "[i]f the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered `acceptable.'"

1.2 PROJECT SUMMARY

1.2.1 SITE LOCATION

The 539.9-acre Project site is located in unincorporated Riverside County at the western edge of the City and in the City's sphere of influence. The City is located east of the City of Moreno Valley and unincorporated Riverside County, west of the City of Banning and unincorporated Riverside County, north of the City of San Jacinto and unincorporated Riverside County, and south of the City of Calimesa and unincorporated Riverside County. The Project site is situated astride the regional transportation network which connects the Ports of Long Beach and Los Angeles, both major gateways for international trade, to the Inland Empire and the Western United States. State Highway (SR-60) abuts the Project site to the north, Interstate 10 (I-10) is located approximately 1.5 miles to the north of the site, and Interstate 79 (I-79) is located approximately 1.5 miles to the east of the site. The Project site is located west of Jack Rabbit Trail and south of SR-60.

1.2.2 PROJECT OVERVIEW

The Project Applicant, JRT BP 1 LLC, proposes to entitle and develop the Project on a 539.9-acre undeveloped site (Project site or site) and allow for the development on the Project site of a maximum of 246,000 square feet (sf) of general commercial uses in addition to a 125-room hotel (90,000 sf) and a maximum of 4,995,000 sf of industrial uses. The Project would provide 124.7 acres of open space to accommodate landscaped manufactured slopes, fuel modification areas, and natural open space as a buffer to adjacent conservation area and 152.4 acres of open space – conservation. The Project would conserve a total of 230.82 acres of lands that would support the function of Proposed Core 3 consistent with the MSHCP goals of providing live-in habitat and facilitating movement, including 152.42 acres on site and 78.40 acres off site. This 78.40-acre off-site area is outside of the Project boundary and is in Riverside County and not within the City's SOI. Associated improvements to the Project site would include, but are not limited to, paved roads, paved parking areas, drive aisles, truck courts, utility infrastructure, landscaping, water quality basins, signage, lighting, property walls, gates, and fencing, including perimeter fencing for the Project site.

The Project is primarily defined by the Beaumont Pointe Specific Plan. The Specific Plan is also available for review at the City's Planning Division at 550 East 6th Street, Beaumont, CA 92223 and on the City's website. The Specific Plan identifies ten (10) Planning Areas (PAs), of which two (2) are identified and zoned for General Commercial uses (PAs 1 and 2), six (6) are identified and zoned for Industrial uses (PAs 3 through 8), and the remaining two PAs are identified and zoned for Open Space (PA 9) and Open Space – Conservation (PA 10).

1.2.3 PROJECT OBJECTIVES

The fundamental purpose and goal of the Beaumont Pointe Specific Plan is to accomplish the orderly development of General Commercial, Industrial, Open Space, and Open Space-Conservation land uses over the approximately 539.9-acre Project site. The Project would achieve this goal through the following Project Objectives:

1. Develop large land areas in the City and particularly south of SR-60 and adjacent to existing industrial uses, infrastructure, and truck routes to meet the growing demand for large scale industrial and warehouse development in the City while minimizing impacts of industrial development on residential and other sensitive receptors in the City, which are primarily located north of SR-60.

2. Providing for conservation of open space habitat within MSHCP criteria cells in a manner consistent with the MSHCP requirements and providing access for wildlife movement to Caltrans constructed and proposed wildlife under-crossings along the SR-60 Freeway that abut the northern Project boundary to accommodate wildlife movement.

3. Maximizing opportunities to develop land in the City's sphere of influence to provide job opportunities and economic benefit to the City and its residents, including new sales and property tax revenues that can be used for City services and providing sufficient fiscal benefit to permit annexation of the Project site into the City.

4. Creating new job opportunities within the City of Beaumont which improve the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances.

5. Fulfilling a need in the City and region for wellness-based retail, including entertainment, recreation, hospitality, and restaurants.

6. Developing a center that will accommodate a variety of future tenants, including light manufacturing, warehouse, distribution tenants, and other businesses that rely on transportation efficiency within an industrial corridor in a location with superior access to the local and regional transportation network, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.

7. Developing a project that utilizes existing investment in capital improvements for water, reclaimed water, sewer, storm drain and circulation facilities to further the planned development of land in the City and in its sphere of influence.

8. Developing a range of warehouse facility options, such as varying structure sizes and building configurations within the City with high quality businesses to facilitate local and regional distribution of goods while minimizing vehicle miles traveled, air quality, and greenhouse gas impacts.

9. Minimizing the demand for water resources by creating a development-wide landscape concept that features drought-tolerant plant materials to provide for an aesthetically pleasing outdoor environment and developing a project where recycled water is planned to be available.

1.2.4 CITY OF BEAUMONT ACTIONS COVERED BY THE EIR

The following discretionary and administrative actions are required of the City to implement the Project. The EIR prepared for the Project covers all discretionary and administrative approvals which

may be needed to construct or implement the Project, whether or not they are explicitly listed. They include:

- General Plan Amendment (PLAN2019-0284)
- Pre-Zone (PLAN2019-0283)
- Beaumont Pointe Specific Plan (SP2019-0003)
- Beaumont Pointe Sign Program (PLAN2022-0856)
- Vesting Tentative Parcel Map (VTPM) No. 38161 (PM2022-0012)
- Development Agreement (PLAN2023-0906)
- Approval by the City and LAFCO of annexation to the City of Beaumont and approval by BCVWD and LAFCO of annexation to the Beaumont-Cherry Valley Water District
- Minor Amendment to the Western Riverside County Multiple Species Habitat Conservation Plan

1.2.5 APPROVALS FROM OTHER AGENCIES

The California Public Resource Code (Section 21104) requires that all EIRs be reviewed by responsible and trustee agencies (see also CEQA Guidelines Section 15082 and Section 15086(a)). As defined by CEQA Guidelines Section 15381, "the term 'Responsible Agency' includes all public agencies other than the Lead Agency which have discretionary approval power over the project." A "Trustee Agency" is defined in CEQA Guidelines Section 15386 as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California."

The anticipated agencies expected to use the EIR are described below. However, the EIR can be used by any Trustee Agency or Responsible Agency, whether identified in the EIR or not, as part of their decision-making processes in relation to the proposed Project.

Public Agency	Approvals and Decisions
City of Beaumont	
Proposed Project – City of Beaumont Discretionary Approvals	
Planning Commission	• Provide recommendation to the Beaumont City Council regarding whether to certify the Project's EIR. • Provide recommendations to the Beaumont City Council regarding whether to approve: o General Plan Amendment (PLAN2019-0284), o Pre-Zone (PLAN2019-0283). o Beaumont Pointe Specific Plan (SP2019-0003), o Beaumont Pointe Sign Program (PLAN2022-0856) o Vesting Tentative Parcel Map o Development Agreement

"ATTACHMENT I"

Public Agency	Approvals and Decisions
City Council	• Certify the Project's EIR (ENV2019-0008) and adopt the Mitigation Monitoring and Reporting Program and Findings and Statement of Overriding Considerations. • Approval or Adoption of: o General Plan Amendment (PLAN2019-0284), o Pre-Zone (PLAN2019-0283). o Beaumont Pointe Specific Plan (SP2019-0003), o Beaumont Pointe Sign Program (PLAN2022-0856) o Vesting Tentative Parcel Map o Development Agreement
City of Beaumont	• Annexation Application • Joint Project Review (as Permittee) • Minor Amendment to the MSHCP (submitted by the City with approval by the Wildlife Agencies)
Subsequent City of Beaumont Discretionary and Ministerial Approvals	
City of Beaumont Subsequent Implementing Approvals	• Approve Final Phased Parcel Maps • Approve Plot Plans • Approve Landscaping/Irrigation Plan • Approve Conditional or Temporary Use Permits, if required. • Issue Grading Permits • Issue Building Permits • Approve Road Improvement Plans • Approve Infrastructure Plans • Issue Encroachment Permits • Approve public right-of-way dedications • Approve Water Quality Management Plan • Approve connections to the municipal sewer system
Responsible Agencies – Approvals and Permits	
Beaumont-Cherry Valley Water District (BCVWD)	• Annexation • Adoption of the Water Supply Assessment • Approvals for construction of water infrastructure and connection to water distribution system.
Eastern Municipal Water District	• Approvals for construction of sewer infrastructure and connection to sewer distribution system.
Riverside County Local Agency Formation Commission (LAFCO)	• Approval of the BCVWD and City annexation applications.
Western Riverside County Regional Conservation Authority	• Approval of Criteria Refinement • Minor Amendment to the MSHCP • Approval of Habitat Evaluation and Acquisition Negotiation Strategy • Determination of Biologically Equivalent or Superior Preservation
Regional Water Quality Control Board (RWQCB)	• Issuance of a Construction Activity General Construction Permit.

Public Agency	Approvals and Decisions
	• Issuance of a National Pollutant Discharge Elimination System (NPDES) Permit. • Issuance of a Section 401 Permit pursuant to the Clean Water Act
Riverside County Flood Control and Water Conservation District	• Approval of master plan of drainage infrastructure
Southern California Gas Company and Southern California Edison	• Issuance of approvals necessary for the installation of new SoCalGas and SCE facilities/connections to service the Project.
South Coast Air Quality Management District	• Issuance of permits that allow for the construction and operation of the proposed Project.
U.S. Army Corps of Engineers	• Issuance of a Section 404 Permit pursuant to the Clean Water Act
U.S. Fish and Wildlife Service	• Approval of Criteria Refinement • Minor Amendment to the MSHCP • Determination of Biologically Equivalent or Superior Preservation •
Trustee Agencies – Approvals and Permits	
Native American Heritage Commission	• Ensuring California Native American tribes have accessibility to ancient Native American cultural resources on public lands overseeing the treatment and disposition of inadvertently discovered Native American human remains and burial items, and administering the California Native American Graves Protection and Repatriation Act.
California Department of Fish and Wildlife	• Approval of Criteria Refinement • Minor Amendment to the MSHCP • Determination of Biologically Equivalent or Superior Preservation • Issuance of a Section 1602 Streambed Alteration Agreement

1.3 ENVIRONMENTAL REVIEW AND PUBLIC PARTICIPATION

The City conducted an extensive environmental review of the Project to ensure that the City's decision makers and the public are fully informed about the potential significant environmental effects of the Project; to identify ways that environmental damage can be avoided or significantly reduced; and to prevent significant, avoidable damage to the environment by requiring changes in the Project using mitigation measures which have been found to be feasible. To do this, the City, acting as lead agency under CEQA, undertook the following:

- Circulated a Notice of Preparation (NOP) to the California Office of Planning and Research (the "State Clearinghouse"), Responsible Agencies, Trustee Agencies, and other interested parties on September 7, 2020 for a 30-day review period between September 7, 2020 and October 6, 2020;

- The NOP was posted on the City's website and Beaumont City Hall Planning Department, and at the Riverside County Clerk's office on September 7, 2020;

- The NOP was posted at the Riverside County Clerk's office on September 2, 2020

- Published the NOP in the Press-Enterprise Newspaper, which is the newspaper of general circulation in the area affected by the Project, Publish Date September 7, 2020;

- Held a publicly noticed EIR Scoping Meeting via teleconference communications (live streaming), recorded for the City's official YouTube webpage, and open to public attendance subject to social distancing and applicable health orders, on September 17, 2020, to solicit comments from the public on the environmental issue areas that should be analyzed in the EIR;

- Sent a Notice of Availability (NOA) and Notice of Completion (NOC) and electronic copies of the DEIR to the California Office of Planning and Research, State Clearinghouse, on December 21, 2022;

- Mailed via certified mail a copy of the NOA to all Responsible Agencies, Trustee Agencies, and other interested parties and organizations to inform recipients that the DEIR was available for a 45-day review period beginning on December 22, 2022, and ending on February 8, 2023;

- The NOA was posted on the City's website and at the Riverside County Clerk's office on December 21, 2022;

- Published the NOA in the Press-Enterprise Newspaper, which is the newspaper of general circulation in the area affected by the Project, on December 22, 2022;

- The DEIR was posted on the City's website at https://www.beaumontca.gov/1143/Beaumont-Pointe-SpecificPlan during the public review period for the DEIR.

- Prepared responses to comments on the DEIR received during the 45-day comment period on the DEIR, which have been included in the FEIR;

- Distributed the FEIR, including individual responses to agencies that commented on the DEIR on November 17, 2023; and

- Held a Planning Commission hearing on November 29, 2023;

- Held a Planning Commission hearing on January 10, 2024;

- Held a City Council hearing on March 19, 2024.

For the purposes of CEQA and the Findings herein set forth the Record of Proceedings for the Project and consists of those items listed in CEQA Section 21167.6(e), along with other items contained within the City's files that are relevant to the consideration of the Project. The Record of Proceedings for the

"ATTACHMENT I"

City's decision on the Project consists of the following documents, at a minimum and without limitation, which are herein incorporated by reference and made part of the record supporting these Findings:

- The Notice of Preparation, Notice of Availability, and all other public notices issued by the City in conjunction with the Project;
- The DEIR for the Project and all technical appendices and documents cited, relied upon or incorporated by reference;
- All written comments submitted by agencies, organizations, or members of the public during the public review comment period on the DEIR and the City's responses to those comments (FEIR), as well as the Memoranda entitled: "Beaumont Pointe Specific Plan – Supplemental CEQA Memorandum" (herein "Supplemental CEQA Memorandum"), and "Beaumont Pointe Specific Plan Project – Response to Comment Letter" (comments from the Sierra Club), and other responses provided to address late comments;
- The DEIR for the Project and all technical appendices and documents cited, relied upon or incorporated by reference;
- The Mitigation Monitoring and Reporting Program for the Project;
- All reports, studies, memoranda, maps, staff reports, or other planning documents relating to the Project prepared by the City or consultants to the City with respect to the City's compliance with the requirements of CEQA and with respect to the City's action on the Project;
- All documents submitted to the City by public agencies, organizations or members of the public in connection with the DEIR, up through the close of the public review period for the project on February 8, 2023;
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by the City in connection with the Project;
- Any documentary or other evidence submitted to the City at such information sessions, public meetings, and public hearings;
- All findings and resolutions adopted by the City regarding the project, all documents, cited or referred to therein and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Matters of common knowledge to the City, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these Findings, in addition to those cited above; and any other materials required for the record of proceedings by CEQA Section 21167.6(e).

"ATTACHMENT I"

All the documents identified above and all the documents which constitute the Record of Proceedings for the City's actions related to the Project and are required to be part of the record pursuant to Public Resources Code Section 21167.6(e) are located at the City, 550 East 6th Street, Beaumont, CA 92223, Department of Planning. Questions should be directed to Carole L. Kendrick, Planning Manager.

2.0 ENVIRONMENTAL IMPACTS AND FINDINGS

The EIR was prepared by T&B Planning, Inc., an independent, professional consulting firm. The professional qualifications and reputation of the EIR Consultant, the supervision and direction of the EIR Consultant by City staff, the thorough and independent peer review of the DEIR and DEIR, including comments and responses by City staff, and the review and careful consideration of the DEIR by the City, including comments and responses; all conclusively show that the DEIR is the product of and reflects the independent judgment and analysis of the City as the Lead Agency.

Based on the NOP, *Technical Appendix A* to the DEIR, and the responses of the NOP, the EIR analyzed 20 potential areas where significant environmental impacts could result from implementation of the Project. These environmental topics were analyzed in the EIR and include aesthetics, agriculture and forest resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire.

Having received, reviewed, and considered the information in the DEIR, as well as any and all other information in the record, the City hereby makes findings pursuant to and in accordance with CEQA Sections 21081, 21081.5, and 21081.6.

3.0 ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

The City hereby finds that the following potential environmental impacts associated with the implementation of the Project are less-than-significant and therefore do not require the imposition of mitigation measures.

3.1 AESTHETICS

Project impacts for Aesthetics do not result in significant impacts and findings are discussed below.

3.1.1 REGULATORY REQUIREMENTS AND PROJECT DESIGN FEATURES

The Project will comply with Regulatory Requirements and Project Design Features that serve to reduce any potential impacts to less than significant. RR 1-1, which is applicable regardless of CEQA and would apply to any project under similar circumstances. RR 1-1 does not constitute a mitigation measure but will nonetheless be included in the Project's Mitigation Monitoring and Reporting Program to ensure implementation of mandated RRs.

RR 1-1 The Project is required to comply with City of Beaumont Municipal Code Chapter 8.50, which establishes specific design, construction, and performance standards applicable to lighting and lighting fixtures within the City to reduce "skyglow" or light pollution that affects day or nighttime views of the Mt. Palomar Observatory.

The Project includes the following Project Design Feature (PDF 1-1) that serves to reduce the Project's impacts. PDFs will be included in the Project's Mitigation Monitoring and Reporting Program to ensure their implementation.

PDF 1-1 Development implementing the Beaumont Pointe Specific Plan shall comply with the Development Standards set forth in Chapter 3 and the Design Guidelines related to Architectural Design and Landscape Design in Chapter 4 of the Specific Plan. Conformity to the Development Standards and Design Guidelines would be addressed by the City's future review of implementing building permits for compliance with the Specific Plan's requirements and would serve to reduce and/or avoid impacts relating to aesthetics.

3.1.2 THRESHOLD A

Impact Statement: The Project would not have a substantial adverse effect on a scenic vista.

- ❑ **Findings**

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.1.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold a; therefore, no mitigation is required.

- **Substantial Evidence**

The City has not designated any portion of the Development Site as a scenic resource. Accordingly, the Development Project will not physically alter a designated scenic resource. With respect to the ability of the Development Project to block a scenic vista, although landforms in mid-ground views (PAs 1-8) would be altered for the development, the Project would not allow grading within PA 10, which would preserve foreground landforms along the SR-60 Freeway and ridgeline background views behind the development. Landform would not change along the north-northeast edge of the Project site between the site's north-northeast property line to the SR-60 Freeway. Additionally, the Project's proposed structures, which would reach a maximum height of 60 feet above finished grade, are not anticipated to block major views to the San Gorgonio Mountains, San Bernardino Mountains, and San Jacinto Mountains due to the Project site's orientation and topography in relation to SR-60 and Frontage Road. Specifically, the topography to the north near SR-60 will be higher than the finished grade building pads for the proposed industrial uses, which would limit the views of the proposed structures from SR-60. Under Project conditions, SR-60 and Frontage Road are anticipated to continue to provide intermittent and partial views to the existing ridgelines.

Proposed signage, due to its small size in comparison to panoramic ridgelines views, would not block views to the San Gorgonio Mountains, San Bernardino Mountains, and San Jacinto Mountains. The southern portion of the Project site and the areas surrounding the proposed structures will be designated as Open Space and Open Space - Conservation, which will also help preserve the scenic views within this area. The Project's proposed Industrial and General Commercial land uses are in proximity to developing areas that are designated for Industrial uses. In accordance with the Beaumont General Plan goals and policies, the Project's design will be reviewed to ensure that the Project is attractive and cohesive, without diminishing the quality of the natural beauty of the general vicinity. The Beaumont General Plan goals and policies are intended to ensure that urbanization of the City will not result in significant visually intrusive or incompatible development. As such, through compliance and implementation of the Beaumont General Plan goals, policies, and implementation strategies, and consistency with the established Specific Plan Development Standards and Design Guidelines and the Sign Program, impacts on scenic vistas would be less than significant. (DEIR pp. 4.1-8 to 4.1-10)

View simulations were presented at the Planning Commission Hearing on January 10, 2024 and are shown in the Supplemental CEQA Memorandum submitted by T&B Planning to the City of Beaumont to incorporate changes requested by the Planning Commission and provided to the City Council. These simulations reflect the design grading plan, the conceptual building architecture and colors, and the Landscape Screen Plan with five-years and 10 years of plant growth after initial planting. The view simulations reinforce the analysis of aesthetic impacts in DEIR and the conclusion that there will be no significant visual impact with respect to preservation of scenic views within the area or scenic vistas (Supplemental CEQA Memorandum).

3.1.3 THRESHOLD B

Impact Statement: The Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

❑ **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.1.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts with respect to Threshold b; therefore, no mitigation is required.

❑ **Substantial Evidence**

According to the Caltrans List of Eligible and Designated State Scenic Highways, there are no designated or eligible State scenic highways within or adjacent to the Project site. The nearest officially designated State scenic highway is CA-243 located approximately 9.5 miles east of the Project site (Caltrans, 2019). At this distance, the Project would not be within the corridor of CA-243 and would not have any effect on views of the scenic resources available in CA-243 corridor. The nearest eligible State scenic highway is CA-74 located approximately 13.0 miles south of the Project site. Additionally, at this distance the Project would not be within the viewing corridor of this eligible State scenic highway and would not have any effect on views of the scenic resources available from this highway corridor. Accordingly, the Project would not have the potential to substantially damage scenic resources within a State scenic highway and no impacts would occur.

According to Figure C-8, *Scenic Highways*, of the Riverside County General Plan, the nearest Riverside County eligible scenic highway to the Project site is San Timoteo Canyon Road/Redlands Boulevard, located approximately 2.1 miles northeast. San Timoteo Canyon Road/Redlands Boulevard is an east-west oriented roadway that provides views to San Gorgonio Mountains and San Bernardino Mountains. Due to distance, intervening topography, and the relatively low profile of the Project's proposed structures and signage, the Project is not anticipated to substantially damage scenic resources within the San Timoteo Canyon Road/Redlands Boulevard corridor and impacts would be less than significant. (DEIR pp. 4.1-10 to 4.1-12)

3.1.4 THRESHOLD C

Impact Statement: The Project would not, in a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings.

❑ **Findings**

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.1.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ **Substantial Evidence**

The Project site is within a non-urbanized area of the City's sphere of influence and unincorporated Riverside County. As such, the Project's potential to degrade the existing visual character or quality of public views of the site and its surroundings is analyzed.

The Project site is vacant and undeveloped, consisting of a mixture of flat to rolling terrain along the south side of SR-60, with steep hillsides and various canyons throughout. The Project site includes

various unmarked trails and is covered in ground covering, trees, and shrubs. Under existing conditions, the Project site has a rural character and includes natural features that the City classifies as scenic resources. The areas surrounding the Project site include vacant undeveloped land, residential land uses, and industrial/commercial uses. Industrial/commercial uses to the east include the Hidden Canyon Industrial Park project, currently under construction, visible from SR-60 and the Project site. Due to the topographic constraints of the Project area, public views of the Project site are limited to SR-60 and Frontage Road. There are limited distant views of the Project site from Oak Valley Parkway north of SR-60.

The Project Applicant proposes to develop the 539.9-acre Project site with Industrial, General Commercial, Open Space and Open Space - Conservation land uses. The conceptual grading design provides for an overall balanced earthwork condition. Development of the Project site would require a substantial amount of earthwork, and earthwork activities are expected to balance on site. The boundary between PA 9 and PA 10 is designated as the "Limits of Disturbance" on the Land Use Plan, meaning that no grading, fuel management, or development activities will occur beyond the location of that line.

Construction activities at the Project site would be visible from public vantage points. The most visible construction activities would occur during mass grading activities, when constructing slopes and leveling higher elevations to create building pads and within PAs 2 and 8, which have the greatest visibility from SR-60. However, overall views of construction activities would be limited due to distance to SR-60 and the surrounding topography. Although landforms in mid-ground views (PAs 1-8) would be altered for development, no grading would occur between the Project site's north-northeast property line and SR-60 or within PA 10, which would preserve existing foreground landforms along SR-60 and distant ridgeline background views to the south. Specifically, building pad elevations would range from approximately 2,348 to 2,410 feet above msl, while the existing landform between the north-northeastern boundary of the Project site and SR-60 would be maintained with elevations ranging between approximately 2,220 to 2,300 feet above msl.

During grading and construction, various pieces of heavy machinery would be used. All Project-related construction activities would be temporary and all construction equipment would be removed from the Project site following the completion of the Project's construction activities. As such, Project-related changes to local visual character as viewed from SR-60 and Frontage Road during near-term construction activities would be less than significant due to limited views of construction equipment and the low profile of construction equipment compared to future development. The construction of the Project would not substantially degrade the existing visual character or quality of public views of the Project site and its surroundings.

Although the Project would convert undeveloped hillside areas to industrial and commercial development, it would not substantially degrade the existing visual character or quality of public views of the Project site and its surroundings because the existing hillsides surrounding the Project site would be maintained, limiting views of the development. Additionally, the Project's proposed structures, which would reach a maximum height of 60 feet above finished grade, would not block views to the San Gorgonio Mountains, San Bernardino Mountains, and San Jacinto Mountains due to Project site's

orientation and topography in relation to SR-60 and Frontage Road. Additionally, the Project's proposed structures, which would reach a maximum height of 60 feet above finished grade, would not block views to the San Gorgonio Mountains, San Bernardino Mountains, and San Jacinto Mountains due to Project site's orientation and topography in relation to SR-60 and Frontage Road. The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

The Beaumont General Plan goals and policies are intended to ensure that urbanization of the City will not result in substantial degradation to the existing visual character or quality of the Project site and its surroundings. The Project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. Therefore, Project impacts would be less than significant. The Project does not conflict with any General Plan policies in the land use and community design element. (DEIR pp. 4.1-12 to 4.1-24)

3.1.5 THRESHOLD D

Impact Statement: The Project would not create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

- ❑ **Findings**

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.1.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold d; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

Currently, the Project site does not have any sources of artificial light. The Project site is within Zone B of the Mt. Palomar Nighttime Lighting Policy Area (RCIT, 2020). Development projects within Zone B of the Mt. Palomar Nighttime Lighting Policy Area are required to adhere to the requirements of Riverside County Ordinance No. 655, which controls artificial lighting sources to protect the Observatory (Riverside County, 1988). Compliance with the Beaumont Municipal Code Chapter 8.50 would ensure compliance with Ordinance No. 655.

Implementation of the Project would introduce new sources of light on the Project site that may affect the nighttime sky. Lighting will be installed on buildings and along streets, parking areas, loading dock areas, and pedestrian walkways for the security and safety of future employees and visitors. Exterior lighting fixtures shall be downward directed. Pole-mounted lights shall be shielded with the light source oriented away from public streets, open space, SR-60, and/or adjacent properties. Additionally, new sources of light from glare may also arise from the use of reflective materials on building exteriors from the Project's proposed structures. Industrial building facades may include freeway visible business identification signs, murals, or other visual works to be used to enhance building walls, particularly along SR-60. Murals may include down-lighting only, to allow passing motorists views of the signs or murals. Uplighting is not permitted. Such signs, murals or other visual works are prohibited

from including moving, flashing, or otherwise visually distracting elements, or materials that are highly reflective.

According to the Project's Conceptual Lighting Study, which was prepared in compliance with Beaumont Municipal Code Chapter 8.50, lighting generated from the proposed industrial and general commercial uses to the trespass line is at an average of zero footcandles and a maximum of 0.7 footcandles. The trespass line is within the edge of PA 9, which is designated as Open Space and serves as a buffer between the Specific Plan's developed areas and the Open Space – Conservation in PA 10. No light trespass would reach PA 10. (Visual Concepts Lighting, 2021)

Additionally, the Project would be required to comply with the Development Standards and Design Guidelines established in the Beaumont Pointe Specific Plan (refer to PDF 1-1). The Design Guidelines contain standards related to architecture to provide specific guidance for future implementing development. None of the Project's proposed building materials would consist of large expanses of reflective materials, except for proposed windows, which would not be mirrored and would have low-potential glare characteristics. Compliance with the Development Standards and compliance with the Design Guidelines of the Beaumont Pointe Specific Plan, the Sign Program, and Beaumont Municipal Code Chapter 8.50 would ensure that all lighting and building design elements proposed by the Project are designed to prevent the creation of substantial light or glare that could affect day or nighttime views in the area, Therefore, the implementation of the Project would not create a new source of substantial light or glare in the area and, as such, the Project's impacts would be less than significant. (DEIR pp. 4.1-24 and 4.1-25)

3.1.6 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in cumulatively considerable impacts related to aesthetics.

- ❑ **Findings**

Potential cumulative impacts of the Project related aesthetics are discussed in detail in Section 4.1.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to aesthetics; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

The Project's potential to result in cumulatively considerable visual quality impacts would be limited to a geographic area that extends a relatively short distance from the Project site. Under existing conditions, the Project site is visible from SR-60 to the north, and Frontage Road to the northeast, which are located at relatively the same elevations as the Project site. Accordingly, for purposes of analysis herein, the Project's cumulative study area for the purposes of scenic vistas is limited to the Project site and immediately surrounding area, as areas beyond this study area would not be in the same viewshed as the Project.

As previously discussed under Threshold a, the City is within the Pass area. Although the City has not designated the nearby mountain ranges or foothills as scenic vistas, the Pass area does provide scenic vistas to the San Gorgonio Mountains, San Bernardino Mountains, San Jacinto Mountains, and Badlands. The implementation of the Project with related projects would not result in substantial adverse effects on scenic vistas, as the orientation of the Project site and the Project's proposed buildings would not substantially obstruct or contribute to the obstruction of views to prominent scenic vistas open to the public and impacts would be less-than-cumulatively considerable. Additionally, the Project and other development projects in the area would be required to comply with the goals, policies, and implementation strategies identified in the Beaumont General Plan, MSHCP and Riverside County General Plan to ensure that urbanization of the City will not result in significant visually intrusive or incompatible development. Therefore, the Project is not anticipated to result in a cumulatively considerable impact on scenic vistas.

As discussed under Threshold b, the Project site is not within or adjacent to any designated or eligible State scenic highway. Therefore, the Project would not have the potential to degrade any scenic resources within a State scenic highway. As such, the Project would not result in a cumulatively considerable impact on scenic resources within a State scenic highway.

As discussed under Threshold c, the Project site is within a rural, yet developing portion of the City's SOI. Although the Project would require substantial landform modification and mid-ground views would be altered for the development, the Project would preserve foreground landforms along the SR-60 Freeway and distant ridgeline views. There are no components of the Project that would substantially degrade public views. The Project would be required to adhere to the Development Standards established in Chapter 3 and Design Guidelines established in Chapter 4 in the Beaumont Pointe Specific Plan, which contains standards related to architecture, landscaping, walls/fences, and other elements of the physical environment. Therefore, the Project would not result in a cumulatively considerable impact to the visual character or quality of public views of the site and its surroundings.

As discussed under Threshold d, the Project incorporates Development Standards and Design Guidelines for exterior lighting and would be required to comply with the regulations of the City's Municipal Code Chapter 8.50 and the Sign Program. All development to the north and east (development to the west and south being precluded by conservation requirements) in the vicinity of the Project site would be in the City and would also be required to comply with the City's Municipal Code Chapter 8.50 regarding lighting. The Project is designed to ensure that Project lighting elements do not adversely affect nighttime views in the local area. Additionally, there are no components of the Project that would produce substantial amounts of glare, such as mirrored windows or reflective glass. Therefore, the Project would not result in a cumulatively considerable impact related to light and glare. (DEIR pp. 4.1-25 and 4.1-26)

3.2 AGRICULTURAL AND FORESTRY RESOURCES

Project impacts for Agricultural and Forestry Resources do not result in significant impacts and findings are discussed below.

3.2.1 THRESHOLD A

Impact Statement: The Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

- ❑ **Findings**

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.2.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold a; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

Based on the most recent Farmland Mapping and Monitoring Program (FMMP) data available for Riverside County (2016) the Project site does not contain any "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance." The majority of the Project site is designated as "Other Land" and the remaining portions (approximately 60.9 acres) of the site, areas located around the northeastern boundary of the Project site and along SR-60, is designated "Farmland of Local Importance" (CDC, 2016b). The Project site has not been used for agriculture. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps pursuant to the FMMP of the California Resource Agency to non-agricultural use, and less than significant impacts would result. (DEIR pp. 4.2-8 and 4.2-9)

3.2.2 THRESHOLD B

Impact Statement: The Project would not conflict with existing zoning for agricultural use, or a Williamson Act contract.

- ❑ **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.2.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold b; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

The Project is zoned under the County of Riverside as "Controlled Development Area" (W-2-20), which is intended for one-family dwellings but includes a broad number of permitted uses, including light agriculture, aviaries, apiaries, grazing of farm animals, and animal husbandry. Additionally, the W-2-20 zone allows the following with a Plot Plan approval: guest ranches, educational institutions, country clubs, churches, and meat cutting/packing plants without slaughtering. The County of Riverside does not consider W-2-20 to be primarily an agricultural use. Additionally, the Project would result in annexation of the Project site to the City. The Project site is not zoned for agricultural use by the City. Accordingly, the Project would not conflict with existing zoning for agricultural use.

The Project site is not located within an agricultural preserve and is not under a Williamson Act contract (RCIT, 2021); therefore, impacts resulting from a conflicting existing Williamson Act contract would be less than significant. (DEIR p. 4.2-9)

3.2.3 THRESHOLD C

Impact Statement: The Project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).

- ❑ **Findings**

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.2.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold c; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

The Project site does not contain any forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)). Accordingly, the Project would not conflict with existing zoning for forest land or timberland and would not result in the loss or conversion of forest land. Accordingly, no impacts relating to existing zoning, or rezoning of, forest land, timberland, or timberland zoned Timberland Production would occur. (DEIR p. 4.2-9)

3.2.4 THRESHOLD D

Impact Statement: The Project would not result in the loss of forest land or conversion of forest land to non-forest use.

- ❑ **Findings**

Potential impacts of the Project related to Threshold d are discussed in detail in Section 5.4.2 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold d; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

The Project site and surrounding areas do not consist of forest land. Therefore, the Project would not result in the loss of forest land or result in the conversion of forest land to non-forest use. Accordingly, no impact would occur and no further analysis of this topic is required. (DEIR, p. 4.2-9)

3.2.5 THRESHOLD E

Impact Statement: The Project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

❑ **Findings**

Potential impacts of the Project related to Threshold e are discussed in detail in Section 4.2.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold e; therefore, no mitigation is required.

❑ **Substantial Evidence**

The Project would not result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. Additionally, the Project would not result in the indirect conversion of agricultural land to non-agricultural use as a result of land use incompatibilities where agricultural and urban uses interface. There are no agricultural uses on the Project site or its surrounding area. The only location in the City with Prime Farmland is the Dowling Farms site, which is now vacant and no longer growing row crops. Therefore, the Project would not result in the conversion of Farmland to non-agricultural uses and no impact would occur.

The Project site and surrounding areas do not consist of forest land; therefore, the Project would not convert forest land to non-forest use.

The Project would not result in changes in the environment which, due to their location or nature, could result in conversion of forest land to non-forest use. Accordingly, no impact would occur and no further analysis of this topic is required. (DEIR, pp. 4.2-9 and 4.2-10)

3.2.6 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to agricultural and forestry resources.

❑ **Findings**

Potential cumulative impacts of the Project related agricultural and forestry resources are discussed in detail in Section 4.2.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to agricultural and forestry resources; therefore, no mitigation is required.

❑ **Substantial Evidence**

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development in the Project area.

The proposed Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps pursuant to the FMMP of the California Resource Agency to non-agricultural use. Therefore, the Project would not contribute to the cumulative loss of farmland or conversion of farmland to a non-agricultural use. No cumulative impacts would result.

The Project site is located in the City's SOI and is not currently zoned by the City. As noted previously, the County of Riverside does not consider W-2-20 to be primarily an agricultural use. Therefore, the Project would not conflict with zoning for an agricultural use. Furthermore, the Project site does not contain a Williamson Contract under existing conditions. Accordingly, the Project would not have cumulative significant impact due to conflicting with a Williamson Contract.

Additionally, there are no forest lands, timberlands, or Timberland Production zones on the Project site or in the Project site's vicinity, nor are any nearby lands under active production as forest land. Therefore, cumulatively significant impacts to forest land would not occur and the Project has no potential to result in a cumulatively considerable impact to the loss of these lands.
(DEIR, p. 4.2-10)

3.3 AIR QUALITY

Project impacts for CEQA Air Quality Thresholds c and d do not result in significant impacts and findings are discussed below.

3.3.1 REGULATORY REQUIREMENTS AND PROJECT DESIGN FEATURES

The Project will comply with Regulatory Requirements RRs 3-1 through 3-3, which are applicable regardless of CEQA and would apply to any project under similar circumstances. RRs 1 through 3-3 do not constitute a mitigation measure but will nonetheless be included in the Project's Mitigation Monitoring and Reporting Program to ensure implementation of mandated RRs.

RR 3-1 The Project shall comply with the provisions of South Coast Air Quality Management District Rule 403, "Fugitive Dust." Rule 403 requires implementation of best available dust control measures during construction activities that generate fugitive dust, such as earth moving and stockpiling activities, grading, and equipment travel on unpaved roads, including limiting vehicle speeds to 15 miles per hour.

RR 3-2 The Project shall comply with the provisions of South Coast Air Quality Management District Rule 1186 "PM_{10} Emissions from Paved and Unpaved Roads and Livestock Operations" and Rule 1186.1, "Less-Polluting Street Sweepers." Adherence to Rule 1186 and Rule 1186.1 reduces the release of criteria pollutant emissions into the atmosphere during construction.

RR 3-3 The Project shall comply with the provisions of South Coast Air Quality Management District Rule 402 "Nuisance." Adherence to Rule 402 reduces the release of odorous emissions into the atmosphere.

3.3.2 THRESHOLD C

Impact Statement: The Project would not expose sensitive receptors to substantial pollutant concentrations.

❑ Findings

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.3.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ Substantial Evidence

Construction Localized Emissions Impact Analysis

Criteria Pollutant Emissions

DEIR Table 4.3-9, *Localized Significant Summary - Construction*, identifies the localized impacts at the nearest receptor location in the vicinity of the Project. For analytical purposes, emissions associated with peak grading activities are considered for purposes of LSTs since these phases represent the maximum localized emissions that would occur. Any other construction phases of development that overlap would result in lesser emissions and consequently lesser impacts than what is disclosed herein. As shown in DEIR Table 4.3-9, Project-related construction emissions would not exceed the applicable South Coast AQMD LSTs for CO, NO_X, PM_{10}, or $PM_{2.5}$ at the maximally impacted receptor location. All other modeled locations in the study area would experience a lesser concentration and consequently a lesser impact. Accordingly, construction of the Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations. Therefore, localized emissions from construction of the Project would result in less than significant impacts with respect to Threshold c.

DPM Source Cancer and Non-Cancer Risks Impact Analysis

The land use with the greatest potential exposure to Project construction DPM source emissions is Location R4, which represents the existing residence at 14157 Bosana Lane, approximately 1,151 feet north of the Project site. At this maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 0.47 in one million, which is less than the South Coast AQMD's significance threshold of 10 in one million. At this same location, non-cancer health risks were estimated to be ≤ 0.01, which would not exceed the applicable threshold of 1.0. As such, the Project would not cause a significant human health or cancer risk to people in adjacent land uses as a result of Project construction activity. All other receptors during construction activity (even if they are located at a nearer distance to the site) would experience less risk than what is identified for the MEIR due to modeled meteorological conditions, source locations, and relative spatial distance from emission sources to other receptor locations. Detailed analysis for construction DPM emissions can be found in the Project's HRA (DEIR *Technical Appendix B2*).

Operational Emissions Localized Emissions Impact Analysis

Criteria Pollutant Emissions

The LST analysis generally includes on-site sources (area, energy, mobile, and on-site cargo handling equipment). However, it should be noted that the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. As such, to establish a maximum potential impact scenario for analytic purposes, the modeled emissions include all on-site Project-related stationary (area) sources and 5% of the Project-related mobile sources. Applying the trip length applied in the CalEEMod

analysis for the Project (approximately 17.54 miles for passenger cars and 40.0 miles for all trucks), 5% of this total would represent an on-site travel distance of approximately 0.9 mile/4,631 feet for passenger cars and 2 miles/10,560 feet for trucks. It should be noted that the longest on-site distance is roughly 0.5 miles for both trucks and passenger cars. As such, the 5% assumption is conservative and would tend to overstate the actual impact because it is not likely that every single passenger car would drive 0.9 mile on the site or that every truck would drive 2 miles on the site.

DEIR Table 4.3-10, *Localized Significant Summary – Operation*, presents the results of the LST analysis for long-term operation of the Project. As shown, operational emissions would not exceed the South Coast AQMD's LSTs at the maximally impacted receptor location. All other modeled locations in the study area would experience a lesser concentration and consequently a lesser impact. Therefore, the Project would have a less than significant localized impact during operational activity.

CO Hot Spot Impact Analysis

The Project would not result in potentially adverse CO concentrations or "hot spots." Detailed modeling of Project-specific CO "hot spots" is not needed to reach this conclusion. An adverse CO concentration, known as a "hot spot," would occur if an exceedance of the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm were to occur.

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

To establish a more accurate record of baseline CO concentrations affecting the SCAB, a CO "hot spot" analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. This "hot spot" analysis did not predict any violation of CO standards. For example, 8.4 ppm 8-hr CO concentration measured at the Long Beach Boulevard/Imperial Highway intersection (highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 7.7 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, an adverse CO concentration, known as a "hot spot," would occur if an exceedance of the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9 ppm were to occur.

The ambient 1-hr and 8-hr CO concentration within the Project study area is estimated to be 2.0 ppm and 1.3 ppm, respectively (data from Hemet/San Jacinto Valley station for 2019). Therefore, even if the traffic volumes for the proposed Project were double or even triple of the traffic volumes generated at the Long Beach Boulevard/Imperial Highway intersection, coupled with the on-going improvements in ambient air quality, the Project would not be capable of resulting in a CO "hot spot" at any study area intersections.

Furthermore, the Bay Area Air Quality Management District (BAAQMD) concluded that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph)—or 24,000 vph where vertical and/or horizontal air does not mix—in order to generate a significant CO impact. The busiest intersection evaluated was that at Wilshire Blvd and Veteran Ave., which has a daily traffic volume of approximately 100,000 vehicles per day and AM/PM traffic volumes of 8,062 vph and 7,719 vph respectively. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).

The highest trips on a segment of road for the Project (Opening Year 2023) during AM and PM traffic is 2,433 vph on Beaumont Avenue/Interstate 10 (I-10) Eastbound Ramps and 3,156 vph on Potrero Boulevard/I-10 Eastbound Ramps, respectively. The highest trips on a segment of road for the proposed Project (Opening Year 2025) during AM and PM traffic is 2,531 vph on Beaumont Avenue/I-10 Eastbound Ramps and 3,254 vph on Potrero Boulevard/I-10 Eastbound Ramps, respectively. The highest trips on a segment of road for the proposed Project (Buildout Year 2027) during AM and PM traffic is 3,412 vph and 4,187 vph on Potrero Boulevard/I-10 Eastbound Ramps, respectively. As such, Project-related traffic volumes are less than the traffic volumes identified in the 2003 AQMP. The proposed Project would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the Project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant. Based on the foregoing analysis, the Project would result in less-than-significant impacts related to the creation of CO Hot Spots.

Individual Exposure Scenario

The residential land use with the greatest potential exposure to Project DPM source emissions is Location R4, which represents the existing residence at 14157 Bosana Lane, approximately 1,151 feet north of the Project site. At this maximally exposed individual receptor (MEIR), the maximum incremental cancer risk attributable to Project DPM source emissions is estimated at 0.86 in one million, which is less than the South Coast AQMD's significance threshold of 10 in one million. At this same location, non-cancer health risks were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to nearby residences. All other receptors during operational activity (even if they are located at a nearer distance to the site) would experience less concentration and consequently less risk than what is identified for the MEIR due to modeled meteorological conditions, source locations, and relative spatial distance from emission sources to other receptor locations. A detailed analysis of Individual Exposure Scenario for construction and operational DPM emissions can be found in the HRA, DEIR *Technical Appendix B2*.

Worker Exposure Scenario

The worker receptor land use with the greatest potential exposure to Project DPM source emissions is Location R6, which represents the Hidden Canyon Industrial Building 2, approximately 305 feet east

of the Project site. R6 is placed at the building façade where a worker could remain for a typical workday. At the maximally exposed individual worker (MEIW), the maximum incremental cancer risk impact is 0.23 in one million which is less than the South Coast AQMD's threshold of 10 in one million. Maximum non-cancer health risks at this same location were estimated to be <0.01, which would not exceed the applicable significance threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent workers. All other receptors during operational activity (even if they are located at a nearer distance to the site) would experience less concentration and consequently less risk than what is identified for the MEIW due to modeled meteorological conditions, source locations, and relative spatial distance from emission sources to other receptor locations.

School Child Exposure Scenario

There are no schools located within ¼ mile of the Project site. As such, there would be no significant impacts that would occur to any schools in the vicinity of the Project. Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop-off in particulate pollution levels at 500 feet. Based on California Air Resources Board (CARB) and South Coast AQMD emissions and modeling analyses, an 80% drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. For purposes of this assessment, a one-quarter mile radius or 1,320 feet geographic scope is utilized for determining potential impacts to nearby schools. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above.

Combined Construction and Operational Impacts

The land use with the greatest potential exposure to Project construction and operational DPM source emissions is Location R4. At the MEIR, the maximum incremental cancer risk attributable to Project construction and operational DPM source emissions is estimated at 1.33 in one million, which is less than the threshold of 10 in one million. At this same location, non-cancer health risks were estimated to be ≤ 0.01, which would not exceed the applicable threshold of 1.0. As such, the Project will not cause a significant human health or cancer risk to adjacent land uses as a result of Project construction and operational activity. All other receptors during operational activity (even if they are located at a nearer distance to the site) would experience less concentration and consequently less risk than what is identified for the MEIR due to modeled meteorological conditions, source locations, and relative spatial distance from emission sources to other receptor locations.

Potential Health Impacts of the Project

The potential impact of Project-generated air pollutant emissions at sensitive receptors has also been considered. Results of the LST analysis indicate that the Project will not exceed the South Coast AQMD localized significance thresholds during construction. Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during Project construction. Additionally, the Project will not exceed the South Coast AQMD localized significance thresholds during operational

activity. Further, Project traffic would not create or result in a CO "hotspot." Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations as the result of Project operations. However, as described in DEIR Table 4.3-7 , the Project would exceed the South Coast AQMD's significance threshold with respect to VOCs, NOx, CO, PM_{10} and $PM_{2.5}$ from operational emissions and this impact is considered significant and unavoidable. Likewise, the Project would not be consistent with elements of the 2016 AQMP.

If a project in the SCAB exceeds the regional significance thresholds, the project could contribute to an increase in health effects in the basin until such time the attainment standard are met in the SCAB. The project exceeds the emissions in DEIR Table 4.3-7 for the following: VOCs, NOx, CO, PM_{10} and $PM_{2.5}$. These emissions would cumulatively contribute to the nonattainment status and would contribute to elevating health effects associated to these criteria air pollutants. However, because of the relatively small amount of emissions from the Project relative to regional-wide emissions, it would be speculative to assess whether or the extent to which the Project would contribute to adverse health effects. South Coast AQMD has not provided methodology, and modeling does not currently exist, to assess the specific correlation between mass emissions generated, cumulative increases from individual projects, and the effect on health or even to determine how exceeding the regional thresholds by small amounts would affect the number of days the region is in nonattainment. For extremely large regional projects (unlike the proposed Project), the South Coast AQMD states that it has been able to correlate potential health outcomes for very large emissions sources – as part of their rulemaking activity, specifically 6,620 lbs./day of NO_X and 89,180 lbs./day of VOC were expected to result in approximately 20 premature deaths per year and 89,947 school absences due to O_3.

The Project would generate up to 189.40 lbs/day of NO_X during construction and 494.43 lbs/day of NO_X during operations (2.86% and 7.47% of 6,620 lbs/day, respectively). Additionally, the Project would also generate a maximum of 34.96 lbs/day of VOC emissions during construction and 179.96 lbs/day of VOC emissions during operations (0.04% and 0.20% of 89,190 lbs/day, respectively). Therefore, the Project is not expected to have a measurable effect on human health and the Project's emissions are not sufficiently high enough to use a regional modeling program to correlate health effects on a basin-wide level. (DEIR, pp. 4.3-42 to 4.3-48)

3.3.3 THRESHOLD D

Impact Statement: The Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

- ❑ **Findings**

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.3.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold d; therefore, no mitigation is required.

- **Substantial Evidence**

Land uses generally associated with odor complaints include agricultural uses (livestock and farming), wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The Project does not contain land uses typically associated with emitting objectionable odors.

Potential odor sources associated with the Project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities. Standard construction requirements would minimize odor impacts from construction. The Project would be subject to standard construction requirements, including the use of low-VOC architectural coatings as required by South Coast AQMD Rule 113, *Table of Standards*; compliance with low sulfur fuel requirements pursuant to South Coast AQMD Rule 431.2, *Low Sulfur Fuel;* and compliance with South Coast AQMD Rule 402, *Nuisance*, which requires that a person shall not discharge air contaminants or other materials that would cause health or safety hazards to any considerable number of persons or the public. Compliance with these standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature, and would cease upon completion of the respective phase of construction; thus, they are considered less than significant.

Potential sources of operational odors generated by the Project would include disposal of commercial and industrial refuse and the use of diesel equipment. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with City's solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on site. Additionally, the Project includes the construction of a sewer lift station. However, the location of the sewer lift station, which is located more than ¼ mile or 1,320 feet from the nearest residential land use, would not result in the potential odor source affecting a substantial number of people. The proposed Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project operations would not adversely affect a substantial number of people, and Project impacts during long-term operations would be less than significant. (DEIR, pp. 4.3-48 and 4.3-49)

3.3.4 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to air quality (exposure of sensitive receptors to substantial pollutant concentrations and odors; CEQA Air Quality Thresholds c and d).

- **Findings**

Potential cumulative air quality impacts of the Project related to exposure of substantial pollutant concentrations and odors are discussed in detail in Section 4.3.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to these impacts; therefore, no mitigation is required.

- **Substantial Evidence**

As shown in DEIR Table 4.3-9, *Localized Significant Summary - Construction*, emissions would not exceed the South Coast AQMD Localized Threshold for CO, NOx, PM10, or PM2.5. Pursuant to the South Coast AQMD's CEQA Air Quality Significance Thresholds, projects with daily emissions that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant impact; therefore, the Project's emissions during construction would be less than significant on a direct and cumulative basis.

As shown in DEIR Table 4.3-10, Localized Significant Summary – Operation, under long-term operating conditions, the Project's localized operational emissions would not exceed any of the South Coast AQMD LST thresholds. Pursuant to the South Coast AQMD's CEQA Air Quality Significance Thresholds, the Project would have a less-than-cumulatively considerable LST impact during long-term operation. Additionally, the Project would have no potential to result in or contribute to a CO "Hot Spot." Accordingly, impacts associated with CO "Hot Spots" would be less than cumulatively considerable. (DEIR, pp. 4.3-49 to 4.3-50)

The Project would not result in a source of odors that would adversely affect a substantial number of people during construction or operation. Compliance with these standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature and would cease upon completion of the respective phase of construction. Further, potential sources of operational odors generated by the Project would include disposal of commercial and industrial refuse and the use of diesel equipment. It is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with City's solid waste regulations, thereby precluding substantial generation of odors due to temporary holding of refuse on site. Additionally, the Project includes the construction of a sewer lift station, however the location of the sewer lift station, which is located more than ¼ mile or 1,320 feet from the nearest residential land use, would not result in the potential odor source affecting a substantial number of people. The Project also would be required to comply with SCAQMD Rule 402 to prevent occurrences of public nuisances. Therefore, odors associated with the proposed Project would not adversely affect a substantial number of people; and Project impacts during short-term construction or long-term operations would be less than significant. (DEIR, pp. 4.3-49 to 4.3-49) There are no nearby projects with sources of odors that the Project odors would combine with to adversely affect a substantial number of people; therefore, impacts would be less than cumulatively considerable.

3.4 BIOLOGICAL RESOURCES

Project impacts for CEQA Biological Resources Threshold e do not result in significant impacts and findings are discussed below.

3.4.1 THRESHOLD E

Impact Statement: The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

❑ **Findings**

Potential impacts of the Project related to Threshold e are discussed in detail in Section 4.4.7 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold e; therefore, no mitigation is required.

❑ **Substantial Evidence**

The Project would be consistent with all applicable General Plan policies pertaining to biological resources. The City does not have a tree preservation policy or ordinance. The Project would not conflict with any local policies or ordinances protecting biological resources. Therefore, no impacts would occur. (DEIR p. 4.4-59)

3.4.2 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to biological resources (conflict with policies or ordinances protecting biological resources).

❑ **Findings**

Potential cumulative biological resources impacts of the Project related to policies and ordinances are discussed in detail in Section 4.4.8 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to these impacts; therefore, no mitigation is required.

❑ **Substantial Evidence**

The proposed Project would impact local movement routes for wildlife but would conserve lands contributing to the assembly of the adjacent Proposed Core 3 and would therefore support the MSHCP goals for Proposed Core 3, including the movement of wildlife through Proposed Core 3. As such, the Project would not result or contribute to a cumulative impact to wildlife movement or corridors. (DEIR, pp. 4.4.-61 and 4.4.-62)

3.5 CULTURAL RESOURCES

Project impacts for CEQA Cultural Resources Thresholds a and c do not result in significant impacts and findings are discussed below.

3.5.1 REGULATORY REQUIREMENTS

The following Regulatory Requirements (RRs) are applicable regardless of CEQA and would apply to any project under similar circumstances and, therefore, do not constitute mitigation measures. However, they will nonetheless be included in the Project's Mitigation Monitoring and Reporting Program to ensure the implementation of the mandated RRs.

RR 5-1 The Project shall comply with the applicable provisions of California Health and Safety Code Section 7050.5 as well as Public Resources Code Section 5097 et. seq., which

require the County Coroner be contacted if human remains are discovered. If the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner is required to contact the NAHC by telephone within 24 hours. Whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons.

3.5.2 THRESHOLD A

Impact Statement: The Project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.5.6 of the DEIR. No historic resources, as defined by CEQA Guidelines Section 15064.5, are present on the Project site; therefore, no historic resources could be altered or destroyed by construction or operation of the Project. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

A direct and/or indirect impact to a listed or eligible NRHP or CRHR resource, if they occurred, would result in a potentially significant impact.

BFSA reviewed the NRHP Index and Office of Historic Preservation, Built Environment Resources Directory, which did not indicate the presence of any historical resources within the Project boundaries. The Project site contains the following six potentially historic resources: RIV-5060 (historic trash scatter), RIV-5061 (historic trash scatter), P-33-006229 (historic Jack Rabbit Trail Road alignment), P-33-009027 (prehistoric isolate), P-33-015672 (potentially historic water storage tank and valves), and P-33-015673 (concrete pads and trash scatter). Phase II significance testing consisted of archaeological testing at the two archaeological sites, RIV-5060 and RIV-5061, which were previously identified as having historic trash scatter, while survey information and the already presented archival data was utilized for the remaining resources. Results of the Phase I and Phase II study determined that the six potentially historic resources were not eligible for listing under the CRHR or NRHP.

The Beaumont Pointe Specific Plan Project will result in direct impacts to recorded cultural resources RIV-5060, RIV-5061, P-33-006229, P-33-009027, P-33-015672, and P-33-015673. However, all of these have been evaluated as not significant and ineligible for listing on the CRHR or NRHP. Therefore, there are no significant historical resources located within the Project site, and no impact to historical resources would occur. (DEIR pp. 4.5-14 to 4.5-16)

3.5.3 THRESHOLD C

Impact Statement: The Project would not disturb any human remains, including those interred outside of formal cemeteries.

❑ **Findings**

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.5.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ **Substantial Evidence**

The Project site does not contain a cemetery and no known formal cemeteries are located within the immediate site vicinity. Field surveys conducted on the Project site did not identify the presence of any human remains and no human remains are known to exist beneath the surface of the site. Nevertheless, the remote potential exists that human remains may be unearthed during ground disturbance activities associated with Project construction.

If human remains are unearthed during Project ground disturbance activities, the contractor would be required by law to comply with California Health and Safety Code Section 7050.5 "Disturbance of Human Remains." According to Section 7050.5(b) and (c), if human remains are discovered, the County Coroner must be contacted and if the Coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, the Coroner is required to contact the NAHC by telephone within 24 hours. Pursuant to California Public Resources Code Section 5097.98, whenever the NAHC receives notification of a discovery of Native American human remains from a county coroner, the NAHC is required to immediately notify those persons it believes to be most likely descended from the deceased Native American. The descendants may, with the permission of the owner of the land, or his or her authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. According to Public Resources Code Section 5097.94(k), the NAHC is authorized to mediate disputes arising between landowners and known descendants relating to the treatment and disposition of Native American human burials, skeletal remains, and items associated with Native American burials. With mandatory compliance to California Health and Safety Code Section 7050.5 and Public Resources Code Section 5097.98 as set forth in RR 5-1 , any potential impacts to human remains, including human remains of Native American ancestry, that may result from development of the Project would be less than significant. (DEIR pp. 4.5-16 to 4.5-17)

3.5.4 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to cultural resources for Thresholds a and c.

❑ **Findings**

Potential cumulative impacts of the Project related to cultural resources are discussed in detail in Section 4.5.7 of the DEIR. The City finds that the development of the proposed Project would not

result in significant cumulative impacts related to cultural resources; therefore, no mitigation is required.

- **Substantial Evidence**

The potential for implementation of the Project to contribute to cumulative impacts to historical resources was analyzed in conjunction with other projects located in areas that were once similarly influenced by the historical agricultural industry of the City and the region. There are no historically significant resources on the Project site. Therefore, implementation of the Project has no potential to contribute towards a significant cumulative impact to historical sites and/or resources.

Mandatory compliance with the provisions of California Health and Safety Code Section 7050.5 as well as Public Resources Code Section 5097 et seq. (see Regulatory Requirement 5-1), would assure that all future development projects within the region treat human remains that may be uncovered during development activities in accordance with prescribed, respectful, and appropriate practices, thereby avoiding significant cumulative impacts. (DEIR, p. 4.5-17)

3.6 ENERGY

Project impacts for CEQA Energy Thresholds a and b do not result in significant impacts and findings are discussed below.

3.6.1 PROJECT DESIGN FEATURES

The Project includes the following Project Design Features (PDFs) that serve to reduce the Project's impacts. The PDFs will be included in the Project's Mitigation Monitoring and Reporting Program to ensure implementation.

PDF 8-1 Office space within the warehouses shall be insulated with a minimum R-13 value in the walls and R-30 in the attic, and all windows will have a minimum 0.57 U-factor and 0.32 SHGC or greater.

PDF 8-2 All roofs within the Project shall be rated at 0.15 aged solar reflectance and 0.75 thermal emittance or greater.

PDF 8-3 Occupant sensing lighting that dims to at least 50% when unoccupied shall be installed within the interior areas of warehouses. All interior lighting shall be LED lighting with 40 lumens/watt for 15 watt or less fixtures, 50 lumens/watt for 15-40 watt fixtures, and 60 lumens/watt for all fixtures exceeding 40 watts.

PDF 8-4 Office space heating within warehouses must utilize heat pumps with ducting insulation of R-4.2 or greater.

PDF 8-5 Tenant lease agreements for the Project shall include contractual language restricting trucks and support equipment from nonessential idling longer than 3 minutes while on site in compliance with the City of Beaumont Idling Ordinance.

3.6.2 THRESHOLD A

Impact Statement: The Project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.6.7 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

Construction

The total electricity usage during construction is 5,846,660 kWh. Additionally, construction equipment used by the Project would result in single event consumption of approximately 1,942,071 gallons of diesel fuel. Construction equipment use of fuel would not be atypical for the type of construction proposed because there are no aspects of the Project's proposed construction process that are unusual or energy-intensive, and Project construction equipment would conform to the applicable CARB emissions standards, acting to promote equipment fuel efficiencies.

CCR Title 13, Title 13, Motor Vehicles, Section 2449(d)(3) Idling, limits idling times of construction vehicles to no more than 5 minutes, thereby precluding unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. BACMs inform construction equipment operators of this requirement. Enforcement of idling limitations is realized through periodic site inspections conducted by City building officials, and/or in response to citizen complaints. Construction worker trips for full construction of the proposed Project would result in the estimated fuel consumption of 1,244,925 gallons of fuel. Additionally, fuel consumption from construction vendor trips (MHDTs and HHDTs) will total approximately 692,294 gallons. Diesel fuel would be supplied by City and regional commercial vendors. Indirectly, construction energy efficiencies and energy conservation would be achieved using bulk purchases, transport, and use of construction materials. The 2020 IEPR released by the CEC has shown that fuel efficiencies are getting better within on and off-road vehicle engines due to more stringent government requirements. Therefore, Project construction energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Operations

The total estimated annual fuel consumption from Project-generated vehicle miles traveled (VMT) would result in a fuel demand 5,318,792 gallons of fuel. Trip generation and VMT generated by the Project are consistent with other industrial uses of similar scale and configuration, as reflected respectively in the Institute of Transportation Engineers (ITE) Trip Generation Manual (10th Ed., 2017); and CalEEMod. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Enhanced fuel economies realized pursuant to federal and state regulatory

actions, and related transition of vehicles to alternative energy sources (e.g., electricity, natural gas, biofuels, hydrogen cells) would likely decrease future gasoline fuel demands per VMT. Furthermore, location of the Project proximate to regional and local roadway systems tends to reduce VMT within the region, acting to reduce regional vehicle energy demands. The Project would include sidewalks, facilitating and encouraging pedestrian access. Facilitating pedestrian and bicycle access would reduce VMT and associated energy consumption. In compliance with the California Green Building Standards Code, the Project would promote the use of bicycles as an alternative mean of transportation by providing short-term and/or long-term bicycle parking accommodations. As supported by the preceding discussions, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

With respect to Project building operation, the Project facility operational energy demands are estimated at: 53,857,582 kBTU/yr of natural gas; and 25,747,206 kWh/yr of electricity. The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other industrial projects of similar scale and configuration. Last, the Project will comply with the applicable Title 24 standards, such as installing on-site renewable energy. Compliance itself with applicable Title 24 standards will ensure that the Project energy demands would not be inefficient, wasteful, or otherwise unnecessary. Implementation of the Project would increase the demand for electricity and natural gas at the Project site and petroleum consumption in the region during operation. However, the electrical and natural gas consumption demands of the Project during operation would conform to the state's Title 24 and to CALGreen standards, which implement conservation measures and are made further efficient by application of CAP points to the Project. Further, the proposed Project would not directly require the construction of new energy generation or supply facilities and providers of electricity and natural gas are in compliance with regulatory requirements that assist in conservation, including requirements that electrical providers achieve state-mandated renewal energy production requirements.

Further, the energy demands of the Project can be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. Therefore, impacts would be less than significant.

The amount of energy and fuel consumed by construction and operation of the Project would not be inefficient, wasteful, or unnecessary. Furthermore, the Project would not cause or result in the need for additional energy facilities or energy delivery systems. Accordingly, the Project's impacts associated with energy consumption would be less than significant. (DEIR, pp. 4.6-9 to 4.6-32)

3.6.3 THRESHOLD B

Impact Statement: The Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and impacts would be less than significant.

❑ Findings

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.6.7 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold b; therefore, no mitigation is required.

❑ Substantial Evidence

The Project was analyzed for consistency with the Intermodal Surface Transportation Efficiency Act of 1991, the Transportation Equity Act for the 21st Century, Integrated Energy Policy Report, State of California Energy Plan, California Code Title 24, Part 6, Energy Efficiency Standards, Assembly Bill (AB) 1493, California Renewable Portfolio Standard (RPS), SB 350, SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Plan (RTP/SCS), the County of Riverside Climate Action Plan and General Plan, and the City'sGeneral Plan.

The Project would not conflict with any federal, State or local plans for renewable energy and energy efficiency. The Project would be consistent with the County's Climate Action Plan strategies and with the City's General Plan policies as well as all state energy efficiency requirements. Furthermore, the Project would minimize construction and operational energy use through energy reduction strategies pursuant to project design features which include measures from the County's CAP. Therefore, impacts would be less than significant. (DEIR, pp. 4.6-32 to 4.6-38)

3.6.4 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to energy.

❑ Findings

Potential cumulative impacts of the Project related to energy are discussed in detail in Section 4.6.8 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to energy; therefore, no mitigation is required.

❑ Substantial Evidence

Cumulative impacts result if the Project, along with cumulative projects, taken together could result in wasteful, inefficient, or unnecessary use of energy. Future projects would be subject to CEQA and would require an energy analysis, consistency with existing plans and policies for renewable energy and energy efficiency, and implementation of control measures and mitigation if necessary to avoid wasteful, inefficient, or unnecessary consumption of energy resources. The areas considered for cumulative impacts to electricity and natural gas supplies are the service areas of the SCE and SoCalGas, respectively, described above in Section 4.6.1.

Buildout of the Project, related projects, and additional forecasted growth in SCE's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. As with the Project, during construction and operation, other future development projects would be expected to incorporate energy conservation features and comply with applicable regulations including CALGreen

and state energy standards under Title 24, which would contribute in minimizing wasteful energy consumption. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of electricity would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas' service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2018 California Gas Report, the CEC estimates natural gas consumption within SoCalGas' planning area will be approximately 2,519 million cf per day in 2022 (CEC, 2018). Based on the Project's estimated natural gas consumption of 53,857,582 kBTU/yr the Project would account for approximately 2.1% of SoCalGas' anticipated annual consumption. Although Project development would result in the use of natural gas resources, the use of such resources would be on a relatively small scale, reduced by measures rendering the Project more energy-efficient, and consistent with regional and local growth expectations for SoCalGas' service area. Furthermore, future development projects would be expected to incorporate energy conservation features and comply with applicable regulations including CALGreen and state energy standards under Title 24. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of natural gas would not be cumulatively considerable and, thus, would be less than significant.

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, the Project would consume 1,942,071 gallons of diesel fuel during construction. The Project's operation would result in an estimated fuel consumption 5,318,792 gallons of fuel per year. For comparison, the CEC Transportation Energy Demand Forecast estimates that between 12.3 billion to 12.7 billion gallons of gasoline and 3.7 billion to 4.7 billion gallons of diesel will be consumed in the year 2030. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions. Therefore, the Project's contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant. (DEIR, pp. 4.6-38 and 4.6-39)

3.7 GEOLOGY AND SOILS

Project impacts for CEQA Geology and Soils Thresholds a through e do not result in significant impacts and findings are discussed below.

3.7.1 REGULATORY REQUIREMENTS

The following Regulatory Requirements (RRs) are applicable regardless of CEQA and would apply to any project under similar circumstances and, therefore, do not constitute mitigation measures. However, they will nonetheless be included in the Project's Mitigation Monitoring and Reporting Program to ensure the implementation of the mandated RRs.

RR 7-1 The Project shall comply with CBSC (Chapter 18) (adopted by the City of Beaumont as Municipal Code Section 15.04.010) and Municipal Code Section 17.11.040, which

requires development projects to evaluate and identify site-specific geologic and seismic conditions. The report must provide site-specific recommendations to preclude adverse effects involving unstable soils and strong seismic ground-shaking, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and design criteria, and selection of appropriate structural systems.

RR 7-2 Prior to grading plan approval and the first issuance of a grading permit for the Beaumont Pointe Specific Plan development, the Project proponent shall provide evidence to the City that a Notice of Intent (NOI) has been filed with the Regional Water Quality Control Board for coverage under the State National Pollutant Discharge Elimination System (NPDES) General Construction Permit for discharge of stormwater associated with construction activities.

RR 7-3 Prior to grading plan approval and the first issuance of a grading permit by the City for the Beaumont Pointe Specific Plan development, the Project proponent shall submit to the City of Beaumont a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion-control plan citing specific measures to control erosion during the entire grading and construction period. Additionally, the SWPPP shall identify structural and non-structural Best Management Practices (BMPs) to control sediment and nonvisible discharges from the site. BMPs to be implemented in the SWPPP may include (but shall not be limited to) the following:

- Sediment discharges from the site may be controlled by the following:
    - Perimeter protection to prevent sediment discharges through silt fences, fiber rolls, gravel bag berms, sand bag barriers, and compost socks.
    - Sediment capture and drainage control through sediment traps, storm drain inlet protection, and sediment basins.
    - Velocity reduction through check dams, sediment basins, and outlet protection/velocity dissipation devices.
    - Reduction in off-site sediment tracking through stabilized construction entrance/exit, construction road stabilization, and entrance/exit tire wash.
    - Slope interruption at permit-prescribed intervals (fiber rolls, gravel bag berms, sand bag berms, compost socks, biofilter bags).
- The construction and condition of the BMPs will be periodically inspected during construction, and repairs will be made when necessary, as required by the SWPPP.
- No materials of any kind shall be placed in drainage ways.
- Materials that could contribute nonvisible pollutants to stormwater must be contained, elevated, and placed in temporary storage containment areas.

- All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected per RWQCB standards to eliminate any discharge from the site. Stockpiles will be surrounding by silt fences.
- The SWPPP will include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance.
- Additional BMPs and erosion-control measures will be documented in the SWPPP and utilized if necessary.
- The SWPPP will be kept on-site for the entire duration of project construction and will also be available to the local RWQCB for inspection at any time.

In the event that it is not feasible to implement the above BMPs, the City of Beaumont can make a determination that other BMPs will provide equivalent or superior treatment either on or off-site.

RR 7-4 Prior to grading plan approval and issuance of a grading permit by the City of Beaumont for the Beaumont Pointe Specific Plan development, the Project proponent shall receive approval from the City of Beaumont for Final Water Quality Management Plan (Final WQMP). The Final WQMP shall specifically identify pollution-prevention, site-design, source-control, and treatment-control BMPs that shall be used on-site to control predictable pollutant runoff to reduce impacts to water quality to the maximum extent practicable. Source control BMPs to be implemented in the Final WQMP may include (but shall not be limited to) those listed in Table G.1 of the Preliminary WQMP (Technical Appendix I2). Treatment-control BMPs shall include on-site detention/sand filtration basins to treat the site's runoff; these facilities shall be maintained and inspected at least twice per year and prior to October 1. Additional BMPs will be documented in the WQMP and utilized if necessary. In the event that it is not feasible to implement the BMPs identified in the Final WQMP, the City of Beaumont can make a determination that other BMPs provide equivalent or superior treatment either on or off-site.

3.7.2 THRESHOLD A

Impact Statement: The Project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, and/or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42).

ii. Strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction.

iv. Landslides.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.7.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

Rupture of a Known Earthquake Fault

There are no known active or potentially active faults on or trending toward the Project site, the Project site is not located within a mapped Alquist-Priolo Earthquake Fault Zone, and County Fault Hazard Zones are located within the subject site or adjacent properties (KCG, 2021). Because there are no known faults located on or trending towards the Project site, there is no potential for the Project to directly or indirectly expose people or structures to substantial adverse effects related to ground rupture. No impact would occur.

Strong Seismic Ground Shaking

Similar to all properties throughout southern California, the Project site is located in a seismically active area and is expected to experience moderate to severe ground shaking during the lifetime of the Project. The Project's buildings will be required by Title 15 of the City's Municipal Code to be constructed in accordance with the CBSC and the City's Building Code. The CBSC and City's Building Code provide building standards that must be met to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures. The CBSC and City's Building Code building standards have been specifically tailored for California earthquake conditions. In addition, the CBSC (Chapter 18) (adopted by the City's as Municipal Code Sections 15.04.010 and 17.11.040) requires development projects to evaluate and identify site-specific geologic and seismic conditions. The report must provide site-specific recommendations to preclude adverse effects involving unstable soils and strong seismic ground-shaking, including, but not limited to, recommendations related to ground stabilization, selection of appropriate foundation type and depths, and selection of appropriate structural systems.

A Geotechnical Report was prepared for the Project site complies with the requirements of Chapter 18 of the CBSC and Titles 15 and 17 of the City's Municipal Code. In conformance with the CBSC, the City will condition the Project to comply with the site-specific ground preparation and construction recommendations contained in the Geotechnical Report, including any updates thereto, as required in Regulatory Requirement RR 7-1. Recommendations are based on the site seismic parameters to ensure that structures are designed for earthquake induced strong ground motions in accordance with CBSC. The Geotechnical Report includes requirements for: supplemental subsurface exploration, general earthwork and grading, fill placement and compaction, remedial grading, manufactured slopes, surface drainage, subdrainage, oversized rock materials, deep fill areas/settlement monitoring, preliminary foundation recommendations, retaining walls, sulfate potential, corrosion potential, preliminary pavement design, and temporary excavations. Mandatory compliance with the recommendations contained within the Project's Geotechnical Report (as required by the CBSC and Beaumont Municipal

Code and Building Code) would ensure that the impact remains less than significant. Additionally, grading plan review is required to verify that the geotechnical requirements are updated specific to the detailed rough grading plans. Furthermore, geotechnical observation and testing shall be conducted during the following stages of grading:

- Upon the completion of clearing and grubbing;
- During all phases of grading, including benching, backcut and key excavation, cut slope excavation, remedial removals of surficial soils, backdrain/subdrain/filter material installation and engineered fill placement;
- During Settlement Monument placement;
- During roadway subgrade preparation and compaction of roadway aggregate base;
- When any unusual conditions are encountered during grading

Future development accommodated by the Specific Plan would be required to have site-specific geotechnical investigation reports prepared by the Project applicant's/developer's geotechnical consultant, in accordance with the CBC and Beaumont Municipal Code Section 17.1.040. The geotechnical investigations would determine seismic design parameters for the site and the proposed building type per CBC requirements. With mandatory compliance with these standard and site-specific design and construction measures, implementation of the Project would not directly or indirectly expose people or structures to substantial adverse effects, including loss, injury or death, involving seismic ground shaking. Impacts would be less than significant.

Seismic-Related Ground Failure, Including Liquefaction

According to available mapping data, the Project site is not located within a State of California Seismic Hazard Zone (California Geologic Survey (CGS)/California Department of Conservation) indicating a susceptibility for liquefaction potential (CGS, 2019a). However, the City's General Plan Safety Element and the RCIT identify the Project site as located within an area of "moderate" susceptibility to liquefaction (RCIT, 2021; City of Beaumont, 2020a). Therefore, the Project site appears to be susceptible to relatively minor amounts of liquefaction settlement. The magnitudes of seismic–induced liquefaction settlement are relatively minor and somewhat localized, occurring generally below depths of 40 feet where groundwater was encountered in the northern and northeastern portion of the Project site (KCG, 2021).

The Geotechnical Report prepared for the Project calculated the total earthquake-induced liquefaction settlement potential using the LiquefyPro software. The evaluation was based on the site class and adjusted peak ground acceleration of 0.705g, as shown in Section 2.5 of the Geotechnical Report, DEIR *Technical Appendix F1*, of the DEIR (KCG, 2021). The analysis indicates that the estimated settlement due to earthquake-induced liquefaction is approximately 0.00 inches to approximately one (1) inch. Differential settlements are estimated to be negligible to approximately a little over 0.5 inches over a distance of 50 feet. Due to the lack of a shallow static groundwater level and the materials encountered,

the materials are not susceptible to significant seismic induced ground failure. With the proposed fill depths and loads imposed from the fill, liquefaction is considered to be negligible (KCG, 2021).

Lateral spreading is primarily associated with liquefaction hazards. Implementation of the Project would result in a less than significant impact associated with liquefaction; thus, the potential for lateral spreading is low (KCG, 2021). Accordingly, impacts associated with lateral spreading would be less than significant.

Furthermore, the Project would be required to be designed and constructed in accordance with applicable seismic safety guidelines, including the requirements of the CBSC and City's Municipal Code and Building Code. As stated previously, the City will condition the Project to comply with the site-specific ground preparation and construction recommendations contained in Section 5 of *Technical Appendix F1* of the DEIR, which will further reduce the risk of seismic-related ground failure due (see Regulatory Requirement RR 7-1). Mandatory compliance with the recommendations contained within the Project's Geotechnical Report (as required by the CBSC and Beaumont Municipal Code and Building Code) would ensure that the impacts remain less than significant. As such, implementation of the Project would not directly or indirectly expose people or structures to substantial hazards associated with seismic-related ground failure and/or liquefaction hazards. Impacts would be less than significant.

Landslides

The Project site is not identified within a State of California designated Hazard Zone for Slope Instability (CGS, 2019a). Information available in the Riverside County Safety Element indicates that portions of the site may have "low" to "moderate" susceptibility for seismic induced slope instability (Riverside County, 2019b).

Approximate 2:1 (horizontal to vertical) cut and fill slopes of variable height are proposed throughout the site. The Geotechnical Report provided an analysis of deep-seated slope stability on selected geologic cross-sections (including both cut and fill slopes) considered representative of the various proposed conceptual slope configurations. The full results of the analysis are presented in the Geotechnical Report, Section 3.2 and Appendix E. Based on the analysis, proposed 2:1 cut and fill slopes are considered grossly stable in the absence of adverse geologic conditions and considered surficially stable.

Furthermore, mandatory compliance with the recommendations contained within the Project site's Geotechnical Report (as required by the CBSC, Beaumont Building Code, and conditions of approval) would ensure that the Project is engineered and constructed to maximize stability and preclude safety hazards to on-site and abutting off-site areas. Accordingly, the Project would not be exposed to substantial landslide risks, and implementation of the Project would not pose a substantial direct or indirect landslide risk to surrounding properties. Impacts would be less than significant.
(DEIR, pp. 4.7-16 to 4.7-19)

3.7.3 THRESHOLD B

Impact Statement: The Project would not result in substantial soil erosion or loss of topsoil.

- **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.7.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold b; therefore, no mitigation is required.

- **Substantial Evidence**

Construction-Related Erosion Impacts

Under existing conditions, the Project site is largely undeveloped and contains only a few remnants of past development within the Project site. As identified in Section 4.9.1 of the DEIR, items related to historic use of the Project site include a water storage tank and associated valves and a concrete pad. Development of the Project site would result in the demolition of these items and grading and construction activities would occur that would further disturb soils on the property. Disturbed soils would be subject to potential erosion during rainfall events or high winds due to the removal of stabilizing vegetation and building materials (e.g., existing concrete foundations) and exposure of these erodible materials to wind and water.

Fill slopes constructed with granular materials derived from on-site sandstone bedrock may be susceptible to erosion. The San Timoteo Formation bedrock on the Project site was moderately hard and considered to be slightly to moderately erodible. The surficial soils, including undocumented artificial fill, colluvium, and alluvium, encountered are typically granular and appear to be readily erodible as evidenced by their soft to loose state and localized erosion gullies. Therefore, the erosion potential of cut slopes exposing on-site bedrock materials may range from low to medium depending on the bedrock materials exposed on the cut slope, as well as the orientation of bedding and joint planes within the slope. In general, cut slopes exposing well-indurated and/or cemented sandstones should have a low to moderate susceptibly to erosion. Friable, poorly cemented, sandstones should have a moderate to high erosion susceptibility.

Pursuant to the requirements of the State Water Resources Control Board (SWRCB), the Project Applicant would be required to obtain coverage under the State's General Construction Stormwater Permit for construction activities (NPDES permit). The NPDES permit is required for all development projects that include construction activities, such as clearing, grading, and/or excavation, that disturb at least one (1) acre of total land area (see Regulatory Requirement RR 7-2). In addition, the Project would be required to comply with the Santa Ana RWQCB's Santa Ana River Basin Water Quality Control Program. Compliance with the NPDES permit and the Santa Ana River Basin Water Quality Control Program involves the preparation and implementation of a SWPPP for construction-related activities (see Regulatory Requirement RR 7-3). The SWPPP will specify the Best Management Practices (BMPs) that the Project Applicant will be required to implement during construction activities to ensure that waterborne pollution – including erosion/sedimentation – is prevented, minimized, and/or otherwise appropriately treated prior to surface runoff being discharged from the

subject property. Examples of BMPs that may be utilized during construction include, but are not limited to, sandbag barriers, geotextiles, storm drain inlet protection, sediment traps, rip rap soil stabilizers, and hydro-seeding. Lastly, the Project would be required to implement erosion and dust control measures pursuant SCAQMD Rule 403 to minimize water- and windborne erosion. Mandatory compliance with the SWPPP and SCAQMD Rule 403 would ensure that the Project's implementation does not result in significant soil erosion or loss of topsoil. Further, the City will condition the Project to comply with the site-specific ground preparation and construction recommendations contained in the Project's Geotechnical Report. Mandatory compliance with the recommendations (as amended by the final Geotechnical Report) relating to cut slopes will ensure that potential impacts related to erosion would be less than significant. Therefore, erosion and loss of topsoil loss impacts associated with construction activities would be less than significant.

Post-Development Erosion Impacts

Upon Project buildout, the Project site would be covered by buildings, landscaping, and impervious surfaces. Stormwater runoff from the Project site would be captured, treated to reduce waterborne pollutants (including sediment), and conveyed off site via an on-site storm drain system. Accordingly, the amount of erosion that occurs on the Project site would be minimized upon build out of the Project and would be reduced relative to existing conditions.

Additionally, to meet the requirements of the City's Municipal Stormwater Permit, the Project Applicant is required to prepare and implement a Water Quality Management Plan (WQMP), which is a site-specific post-construction water quality management program designed to minimize the release of potential waterborne pollutants, including pollutants of concern for downstream receiving waters, under long-term conditions via BMPs. The WQMP is required to identify an effective combination of erosion control and sediment control measures (i.e., Best Management Practices) to reduce or eliminate sediment discharge to surface water from stormwater and non-stormwater discharges. The WQMP also is required to establish a post-construction implementation and maintenance plan to ensure on-going, long-term erosion protection. Compliance with the WQMP will be required as a condition of approval for the Project, as will the long-term maintenance of erosion and sediment control features.

A Project-specific Preliminary WQMP was prepared for the Project to identify appropriate BMPs for the Project. A Final Project-specific WQMP that is in substantial conformance with the approved Preliminary Project-Specific WQMP shall be approved by the City prior to the issuance of grading permits (see Regulatory Requirement RR 7-4). As identified in the Project's Preliminary WQMP, low-impact development (LID) BMPs (e.g., bioretention and biotreatment) are required to detain stormwater on site for runoff mitigation. Additionally, the Project's Preliminary WQMP identifies site-design BMPs, structural and non-structural source-control BMPs, and treatment-control BMPs that would be implemented for the Project.

The Project's drainage system would route runoff from the proposed impervious surfaces to the four detention basins. Each basin would provide stormwater treatment and peak flow mitigation for each of their respective tributaries. The detention basins would remove pollutants from runoff, including sediment, thereby providing first-flush capture, detention, and filtration of stormwater runoff before it

is discharged from the Project site. Additionally, basin vegetation provides erosion protection, which is required to be maintained regularly (PECW, 2023b).

By complying with the NPDES permit and WQMP requirements, the Project would be required to utilize erosion and sediment control measures to preclude substantial, long-term soil erosion and loss of topsoil. Therefore, the Project would result in less than significant impacts related to soil erosion and/or loss of topsoil. (DEIR, pp. 4.7-19 to 4.7-21)

3.7.4 THRESHOLD C

Impact Statement: The Project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

❑ Findings

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.7.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ Substantial Evidence

As discussed under Threshold b, above, the Project's proposed 2:1 cut and fill slopes are considered grossly stable and surficially stable; and, as discussed under Threshold a, above, impacts relating to landslide, lateral spreading, subsidence, and liquefaction would be less than significant.

The undocumented artificial fill soils, colluvium, and loose younger alluvial soils present on the Project site have settlement potential and portions of the younger alluvium are prone to hydro-collapse. The volume of change of excavated on-site materials upon excavation and placement as engineered fill will vary with bedrock and/or soil type, location, and compaction effort. Alluvial soils would have the greatest shrinkage potential and could shrink up to 15%. Further, laboratory testing indicates that the young alluvium on site exhibits a collapse potential of zero to as much as 4.5%, which is respectively considered slight to moderate (KCG, 2021). The majority of the settlement is expected to occur during grading and within a few months thereafter. However, the majority of the alluvium that is potentially susceptible to seismic induced dry settlement would be removed during remedial earthwork and would also be subject to additional settlement during construction due to fill loads, which would reduce the settlement significantly.

Further, the City will condition the Project to comply with the site-specific ground preparation and construction recommendations contained in the Project's Geotechnical Report (DEIR *Technical Appendix F1*). Recommendations in the preliminary Geotechnical Report and any updates thereto relating to settlement monitoring (i.e., installation of surface monuments), fill placement, and compaction will ensure that potential impacts related to settlement, soil shrinkage, and collapse would be less than significant. (DEIR pp. 4.7-21)

3.7.5 THRESHOLD D

Impact Statement: The Project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and would not create substantial direct or indirect risks to life or property.

- **Findings**

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.7.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold d; therefore, no mitigation is required.

- **Substantial Evidence**

Due to the limited presence of siltstone and clay layers, and the known presence of mostly sandstone generated soils within the Project site, the expansion potential of on-site soils is considered low. However, siltstone/clay layers subject to excavation would produce clayey soils, which would be expansive. Minor amounts of siltstone exist on site; however, if siltstone is placed at pad grade, it would produce moderately expansive soils. The Project's Geotechnical Report (DEIR *Technical Appendix F1*) requires evaluation of potential expansive soil at completion of grading pursuant to ASTM D-4829, to ensure that expansive soils would not create a substantial risk to life or property. Mandatory compliance with the recommendations contained within the Project's Geotechnical Report (as required by the CBSC and Beaumont Municipal Code and Building Code) would ensure that the impact remains less than significant. (DEIR, p. 4.7-22)

3.7.6 THRESHOLD E

Impact Statement: The Project would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

- **Findings**

Potential impacts of the Project related to Threshold e are discussed in detail in Section 4.7.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold e; therefore, no mitigation is required.

- **Substantial Evidence**

The Project is designed to connect to the City-owned municipal wastewater conveyance system, with wastewater treatment services supplied by the City's Wastewater Treatment Plant. The Project does not include septic tanks or alternative wastewater disposal systems. Accordingly, no impact related to the use of or performance of septic tanks and/or alternative wastewater systems would occur. (DEIR, p. 4.7-22)

3.7.7 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to geology and soils (risk of loss due to earthquakes, substantial loss of topsoil, unstable soil, expansive soil or septic tanks).

- **Findings**

Potential cumulative geology and soils impacts of the Project related to risk of loss due to earthquakes, substantial loss of topsoil, unstable soil, expansive soil or septic tanks are discussed in detail in Section 4.7.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to these topics; therefore, no mitigation is required.

- **Substantial Evidence**

As noted in the foregoing analysis, all potential Project-related direct and indirect impacts related to geology and soils would be addressed through mandatory conformance with the CBSC, City's Municipal Code, other standard regulatory requirements, and the site-specific recommendations identified in the Geotechnical Report in Technical Appendix F1 of this EIR, including any updates thereto, as required in Regulatory Requirement RR 7-1.

With the exception of erosion hazards, potential hazardous effects related to geologic and soil conditions addressed under Thresholds "a," "c," "d," and "e" are unique to the Project site, and inherently restricted to the specific property proposed for development. That is, issues including fault rupture, seismic ground shaking, liquefaction, landslides, and expansive soils would involve effects to (and not from) a proposed development project, are specific to conditions on the subject property, and are not influenced or exacerbated by the geologic and/or soils hazards that may occur on other, off-site properties. Because of the site-specific nature of these potential hazards and the measures to address them, there would be no direct or indirect connection to similar potential issues or cumulative effects to or from other properties.

As discussed under Threshold b, regulatory requirements mandate that the Project incorporate design measures during construction and long-term operation to ensure that significant erosion impacts do not occur. Other development projects in the vicinity of the Project site would be required to comply with the same regulatory requirements as the Project to preclude substantial adverse water and wind erosion impacts. Because the Project and other projects within the cumulative study area would be subject to similar mandatory regulatory requirements to control erosion hazards during construction and long-term operation, cumulative impacts associated with wind and water erosion hazards would be less than significant. (DEIR, pp. 4.7-23 to 4.7-24)

3.8 HAZARDS AND HAZARDOUS MATERIALS

Project impacts for CEQA Hazards and Hazardous Materials Thresholds a through g do not result in significant impacts and findings are discussed below.

3.8.1 THRESHOLD A AND THRESHOLD B

Impact Statement (Threshold A): The Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

Impact Statement (Threshold B): The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

- **Findings**

Potential impacts of the Project related to Threshold a and Threshold b are discussed in detail in Section 4.9.5 of the DEIR. During Project construction and operation, mandatory compliance to federal, State, and local regulations would ensure that the proposed Project would not create a significant hazard to the environment due to routine transport, use, disposal, or upset of hazardous materials and to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a or Threshold b; therefore, no mitigation is required.

- **Substantial Evidence**

Implementation of the Project would result in the construction and long-term operation of industrial and commercial uses within the Project site. The Project would have the potential to expose workers on site, the public, and/or the environment to a substantial hazard if there are any hazards or hazardous materials on the Project site or if hazardous materials are used/stored or manufactured/shipped on the Project site during construction or long-term operation.

There are no Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs) and Historical Recognized Environmental Conditions (HRECs) associated with the Project site. Therefore, the existing site condition is considered to be free from any environmental concern associated with hazards or hazardous materials. Grading and hauling of on-site soils would have no hazardous risk to the public or the environment through the routine transport, use, or disposal of hazardous materials; and there would be no risk of upset or accident conditions involving the release of hazardous materials into the environment.

During construction, heavy equipment (e.g., dozers, excavators, tractors) would be operated on the Project site. This heavy equipment likely would be fueled and maintained by petroleum-based substances such as diesel fuel, gasoline, oil, and hydraulic fluid, which are considered hazardous if improperly stored or handled. In addition, materials such as paints, adhesives, solvents, and other substances typically used in building construction would be located on the Project site during construction. These materials would not be in such quantities or stored in such a manner as to pose a significant safety hazard to on-site construction workers or the general public. Construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited

requirements imposed by the EPA and DTSC. With mandatory compliance of applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase.

Improper use, storage, or transportation of hazardous materials can result in accidental releases or spills, potentially posing health risks to workers, the public, and the environment. This is a standard risk on all construction sites, and there would be no greater risk for improper handling, transportation, or spills associated with the Project than would occur on any other similar construction site. Thus, impacts due to construction activities would not cause a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, and impacts would be less than significant. Therefore, temporary construction-related impacts would be less than significant.

Long-term operation of the Project site would include industrial and commercial land uses. The future occupants of the proposed buildings are not yet known. However, the building occupants within the industrial land use will include warehousing, manufacturing, fulfillment, parcel hub and/or similar uses. Manufacturing uses may include manufacturing on site and shipment of goods and/or shipment/transport of goods to the Project site for manufacturing on site. Building occupants within the commercial land uses will include restaurants, recreation, and entertainment (e.g., athletic fields, batting cages, miniature golf courses, health clubs, etc.). The full list of permitted, conditionally permitted, and ancillary uses allowed within the Project site are listed on Table 3-1 of the Beaumont Pointe Specific Plan. Based on the facilities and uses that would be allowed at the Project site, hazardous materials (e.g., diesel fuel, lubricants, solvents, corrosives, hazardous materials, etc.) could be used during the course of daily operations at the Project site. It is possible that other hazardous materials also could be used during the course of daily operations at the Project site. In the event that hazardous materials, other than those common materials described above, are associated with future operations, the hazardous materials would only be stored and transported to and from the Project site. General cleaning activities on site that contain toxic substances are usually low in concentration and small in amount; therefore, there is no significant risk to humans or the environment from the use of such cleaning products.

Exposure of people or the environment to hazardous materials during operation of the Project may result from (1) the improper handling or use of hazardous substances; (2) transportation accidents; or (3) an unforeseen event (e.g., fire, flood, or earthquake). The severity of any such exposure is dependent upon the type and amount of the hazardous material involved, the timing, location, and nature of the event, and the sensitivity of the individuals or environment affected. As previously discussed, the U.S. Department of Transportation prescribes strict regulations for hazardous materials transport, as described in Title 49 of the Code of Federal Regulations (i.e., the Hazardous Materials Transportation Act); these are implemented by Title 13 of the California Code of Regulations. It is possible that vendors may transport hazardous materials to and from the Project, and the drivers of the transport vehicles must comply with the Hazardous Materials Transportation Act. Hazardous materials or wastes stored on site are subject to requirements associated with accumulation time limits, amounts, and proper storage locations and containers, and proper labeling. Additionally, for removal of hazardous waste from the site, hazardous waste generators are required to use a certified hazardous

waste transportation company which must ship hazardous waste to a permitted facility for treatment, storage, recycling, or disposal.

State and federal Community-Right-to-Know laws allow the public access to information about the amounts and types of chemicals that may be used by businesses on the Project site. Laws also are in place that require businesses to plan and prepare for possible chemical emergencies through preparation of a Hazardous Materials Inventory and a Hazardous Materials Business Plan. Any businesses that occupy the buildings on the Project site and that handles/stores substantial quantities of hazardous materials (as defined in Section 25500 of California Health and Safety Code, Division 20, Chapter 6.95) will require a permit from the RCDEH in order to register the business as a hazardous materials handler. Such businesses also are required to prepare and comply with Hazardous Materials Inventory and a Hazardous Materials Business Plan, which requires immediate reporting to the RCDEH and the State Office of Emergency Services regarding any release or threatened release of a hazardous material, regardless of the amount handled by the business, and to prepare a Hazardous Materials Business Emergency Plan (HMBEP). An HMBEP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMBEP is to satisfy federal and State Community Right-To-Know laws and to provide detailed information for use by emergency responders.

The RCDEH implements the Hazardous Materials Business Plan for the County. The Hazardous Materials Business Plan is required to contain basic information on the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of on development sites. The plan also contains an emergency response plan, which describes the procedures for mitigating a hazardous release, procedures, and equipment for minimizing the potential damage of a hazardous materials release, and provisions for immediate notification of emergency-response personnel, such as the local fire agency having jurisdiction. Implementation of the emergency response plan facilitates rapid response in the event of an accidental spill or release, thereby reducing potential adverse impacts.

If businesses that use or store hazardous materials occupy the future buildings on the Project site, the business owners and operators would be required to comply with all applicable federal, State, and local regulations to ensure proper transport, use, storage, use, emission, and disposal of hazardous substances (as described above). With mandatory regulatory compliance, the Project would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Based on the foregoing information, potential hazardous materials impacts associated with long-term operation of the Project are regarded as less than significant and no mitigation is required.

With mandatory regulatory compliance with federal, State, and local laws, potential hazardous materials impacts associated with long-term operation of the Project are regarded as less than significant and mitigation is not required. (DEIR, pp. 4.9-12 to 4.9-15)

3.8.2 THRESHOLD C

Impact Statement: The Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

❑ Findings

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.9.5 of the DEIR. The Project site is not located within one-quarter mile of an existing or planned school; therefore, implementation of the Project would not result in an impact associated with hazardous emissions or the handling of hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ Substantial Evidence

The Project's eastern boundary is located approximately three (3) miles west of Three Rings Ranch Elementary School at 1040 Calumet Avenue in Beaumont, California (Google Earth Pro, 2021). There are no proposed schools in closer proximity to the Project site. Accordingly, the Project does not have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes within one-quarter mile of an existing or proposed school. Impacts related to on-site construction and operational uses are considered less than significant.

The vast majority of passenger car and truck travel to and from the Project site will be from 4th Street to Potrero Avenue to access SR-60. There are no existing or proposed schools within one-quarter mile of these roadways or the Potrero Avenue/SR-60 interchange. Additionally, and as described above under the analysis for Thresholds a and b, the use of and transport of hazardous substances or materials to and from the Project site during construction and long-term operational activities would be required to comply with applicable federal, State, and local regulations that are designed to preclude substantial public safety hazards. Accordingly, there would be no significant potential for existing or proposed schools to be exposed to substantial safety hazards associated with emission, handling of, or the routine transport of hazardous substances or materials to and from the Project site. Impacts related to off-site construction and operational uses are considered less than significant. (DEIR, p. 4.9-15)

As discussed in DEIR Section 4.3, *Air Quality*, there are no schools located within ¼ mile of the Project site. As such, there would be no significant impacts that would occur to any schools in the vicinity of the Project. Proximity to sources of toxics is critical to determining the impact. In traffic-related studies, the additional non-cancer health risk attributable to proximity was seen within 1,000 feet and was strongest within 300 feet. California freeway studies show about a 70% drop-off in particulate pollution levels at 500 feet. Based on California Air Resources Board (CARB) and South Coast AQMD emissions and modeling analyses, an 80% drop-off in pollutant concentrations is expected at approximately 1,000 feet from a distribution center. The 1,000-foot evaluation distance is supported by research-based findings concerning TAC emission dispersion rates from roadways and large sources showing that emissions diminish substantially between 500 and 1,000 feet from emission sources. For purposes of this assessment, a one-quarter mile radius or 1,320 feet geographic scope is utilized for

determining potential impacts to nearby schools. This radius is more robust than, and therefore provides a more health protective scenario for evaluation than the 1,000-foot impact radius identified above for analysis pertaining to human health risks associated with air pollutant emissions associated with the Project, including risks to sensitive receptors such as school children. (DEIR, p. 4.3-46)

3.8.3 THRESHOLD D

Impact Statement: The Project site is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment.

❑ Findings

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.9.5 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold d; therefore, no mitigation is required.

❑ Substantial Evidence

Based on a site search on November 6, 2019, the Project site is not listed on any federal, State, or local regulatory agency databases or any list of hazardous materials sites complied pursuant to Government Code Section 65962.5. There are no Federal National Priorities List (NPL), Federal Delisted NPL, Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), Federal Superfund Enterprise Management System Archive (SEMS-ARCHIVE), Federal Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACTS), Federal RCRA non-CORRACTS Treatment, Storage, and Disposal (TSD), Federal RCRA Large Quantity Generator (LQG), Federal RCRA Small Quantity Generator (SQG), Federal RCRA Conditionally Exempt Small Quantity Generator (CESQG), and Federal Institutional Controls/ Engineering Controls (IC/EC) sites listed on the Project site. There are also no State and Tribal Equivalent to NPL or CERCLIS sites; State and Tribal Landfill; State and Tribal Solid Waste Disposal; State and Tribal Leaking Underground Storage Tank (LUST); State or Tribal Spills, Leak Investigation and Cleanups (SLIC); State and Tribal Voluntary Cleanup Program (VCO); and State and Tribal Brownfield sites within Project site. The Project site is not located within the South Coast Air Quality Management District's Facility Information Detail (FIND) database (McAlister GeoScience, 2019). Accordingly, no impact would occur. (DEIR, pp. 4.9-15 to 4.9-16)

3.8.4 THRESHOLD E

Impact Statement: The Project site is not within two miles of an airport and the Project site is not identified as within an airport influence area.

❑ Findings

Potential impacts of the Project related to Threshold e are discussed in detail in Section 4.9.5 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold e; therefore, no mitigation is required.

❑ **Substantial Evidence**

The Project site is not located within the Airport Influence Area for the nearest airport to the Project site, Banning Municipal Airport, located approximately 10 miles to the east of the Project site (RCALUC, 2004). Therefore, implementation of the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area. No impact would occur. (DEIR, p. 4.9-16)

3.8.5 THRESHOLD F

Impact Statement: The Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

❑ **Findings**

Potential impacts of the Project related to Threshold f are discussed in detail in Section 4.9.5 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold f; therefore, no mitigation is required.

❑ **Substantial Evidence**

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route. During an emergency in the City, operations are coordinated from the City's Emergency Operations Center (EOC) in accordance with the City's Emergency Operations Plan (EOP). The primary EOC location is at the Chatigny Recreation Center (CRC) located on the northeast corner of Oak Valley Parkway and Cherry Avenue. The alternate EOC location is the Beaumont City Hall Facility located at 550 E 6th Street. Additionally, according to the City's General Plan Safety Element, The City has major evacuation routes which include I-10 and SR-60 as well as several major roadways. The following existing major roadways are emergency evacuation routes: Brookside Avenue, Oak Valley Parkway, Highland Spring Avenue, and Beaumont Avenue. An interchange at Potrero Boulevard and SR-60 is under construction and an extension of Potrero eastward to connect to Highland Springs Avenue is planned. Following the completion of the extension, Potrero Boulevard will be designated by the City as an evacuation route. Additionally, SR-60, immediately north of the Project site, serves as an evacuation route for the City (City of Beaumont, 2020a).

During Project construction, travel lanes along Frontage Road would be maintained, and construction materials and equipment would be staged on site. The Project is not anticipated to result in a substantial alteration to the design or capacity of an existing road that would impair or interfere with an adopted emergency response or evacuation plan. No impacts would occur.

Under operational conditions, the Project would be required, by Riverside County Ordinance No. 348, Section 21.32a, Emergency Access, to maintain adequate emergency access for emergency vehicles on site. The Project provides for two avenues of egress in the event of an emergency, with primary access provided at 4th Street and emergency access provided via the Jack Rabbit Trail interchange with SR-60. The Project does not include any features that would physically impair or otherwise conflict

with an emergency response plan or evacuation plan. Additionally, as part of the City's discretionary review process, the City reviewed the Project's application materials to ensure that the design of the Project would meet City requirements, appropriate emergency ingress and egress would be available to and from the Project site and that the Project would not substantially impede emergency response times in the local area. According to the Project's Fire Protection Plan, Station 66 would respond within approximately 7 minutes to the Project's entrance, Station 20 would respond within approximately 9 minutes, and Station 106 would respond within approximately 3.54 minutes (Dudek, 2023, p. 37).

The Project's proposed industrial/commercial development is anticipated to increase the call volume at a rate of up to 191 calls per year (4 calls per week or 16 calls per month). Fire Stations 66 and 20 combined emergency responses in 2017 totaled 4,943 calls per year or 5.43 and 8.11 calls per day per station, respectively. The level of service demand for the Project would increase overall call volume; however, the increase is not anticipated to impact the existing fire stations to a point that they cannot meet the demand (Dudek, 2023, p. 40). Furthermore, the Project would be required by City Chapter 3.36, *Emergency Preparedness Facilities Fees*, to contribute costs to improve Emergency Preparedness Centers.

The Project will maintain a conservative approach to fire safety, including maintaining the landscape and structural components according to the standards described above and embracing a "Ready, Set, Go!" stance on evacuation.

The time to evacuate under multiple scenarios was calculated via traffic simulations. DEIR Table 4.9-1, Evacuation Time Summary, displays the calculated evacuation roadway capacity and the time it would take to evacuate for the Project and surrounding land uses for 17 different scenarios. During a Project evacuation, law enforcement would shut down traffic along SR-60 to prevent people from entering an active wildfire area, diverting traffic away from the evacuation area, as well as to keep it open to evacuees who may be in harm's way during mass evacuation scenarios. Evacuees from the Project would need to travel along both or one of the adjacent evacuation routes, SR-60 or West 4th Street, to reach more urban landscapes and the travel way is hardened (low fuel loading, converted landscapes, developed ignition resistant buildings and hardscape on both sides) and exposure during an evacuation would be limited. Currently, there is no population relying on the emergency egress points at Jack Rabbit Trail and the SR-60 Freeway or 4th Street. However, future development (Hidden Canyon Industrial Park) would use these routes for evacuation during some wildfire scenarios. In the scenario where Hidden Canyon evacuates simultaneously with the Project, evacuation of the Project site and Hidden Canyon is possible in all modeled scenarios; therefore, the Project would not substantially impair an emergency evacuation plan (CRA Mobility, 2022). Details of each scenario are found in the Project's evacuation analysis. (DEIR *Technical Appendix M2*)

According to the Project's evacuation analysis, the Project site can be safely evacuated under the worst-case scenarios:

1) When the Project site and Hidden Canyon are fully occupied (all parking spaces occupied) and need to be evacuated concurrently, within 3 hours and 36 minutes using SR-60 only, 3 hours

and 32 minutes using 4th Street only, or 2 hours and 1 minute when all evacuation routes are available (Scenarios 13–15).

2) When the Project site, Hidden Canyon Industrial Park, and Olive Wood are fully occupied (all parking spaces occupied) and need to be evacuated concurrently, within 2 hours 4 minutes when all evacuation routes are available (Scenario 17).

These scenarios will require additional emergency management pre-planning and "in the field" determinations of when evacuations are needed and how they are phased to maximize efficiency. However, as shown above, the current evacuation time for the surrounding communities ranges from 27 minutes to 35 minutes (Scenarios 10 and 16), adding the maximum number of vehicles from the Project's site increases the evacuation time between 16 minutes and 26 minutes.[1]

In the event that the time to evacuate is considered too long to evacuate safely by police and fire personnel in the field at the time of the evacuation event, then Project site employees and visitors can be ordered not to evacuate and to shelter-in-place in the specific locations that were constructed to allow for safe sheltering in place. In accordance with the Fire Protection Plan (DEIR *Technical Appendix M1*), a shelter-in-place plan will be prepared and provided to all on-site personnel outlining the actions to take if a shelter-in-place notification is provided by emergency management sources. The project buildings will be constructed of concrete which is non- combustible and highly resistant to heat. Because of the concrete/ignition resistant construction, fuel modification zone setbacks and the type of lower fire intensity vegetative fuels in the vicinity of the site, sheltering in place is considered to be a safe option if a fast-moving wildfire precludes complete evacuation of the Project site. The City has adopted the Emergency Operations Plan and Standardized Emergency Management System (SEMS)/National Incident Management System (NIMS). This plan establishes the emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of planning efforts of the various emergency staff and service elements. Emergency responders will utilize this plan to determine whether the Project's visitors and employees should shelter-in-place or evacuate under an emergency scenario.

Evacuations are fluid events and evacuation timeframes may vary widely, depending on a variety of factors including the number of vehicles evacuating, the road capacity to move those vehicles, employees' or patrons' awareness and preparedness, evacuation messaging and direction, and on-site law enforcement control. Deferring to actual evacuation results and similar project analysis is a typical approach. In the case of historical wildfire evacuations in Riverside County, there are several notable examples that indicate the extremely high success rate for evacuating large numbers of people and doing so in a managed and strategic way through the available technological innovations available to emergency managers. While large-scale evacuations may take several hours or more and require moving people long distances to designated areas, the success rate in Riverside County is nearly 100% safe evacuations. Comparing similar project analysis indicates that it is common to increase evacuation

[1] Increase in evacuation time determined by comparing no project scenarios (Scenarios 10–12 and 16) to with project and surrounding land use scenarios (Scenarios 13–15 and 17). For example, Scenario 13 (43 minutes) – Scenario 10 (27 minutes) = 16 minutes; and Scenario 14 (59 minutes) – Scenario 11 (33 minutes) = 26 minutes.

times when new communities are built and the increase in time can be 45 minutes or more based on lack of road capacity to absorb and facilitate movement of the additional vehicles. However, as indicated above, the Project can be safely evacuated under the worst-case scenarios and would not interfere or impede with an emergency evacuation route.

When an evacuation is ordered, it will occur according to pre-established evacuation decision points or as soon as notice to evacuate is received, which may vary depending on many environmental and other factors. Additionally, although the Project is not to be considered a shelter-in-place development, because the Project site would be highly ignition resistant in terms of its buildings and landscape/hardscape, it is anticipated that an additional option available to emergency managers in some wildfire and other emergency scenarios will be directing people to temporarily remain on site and seek refuge within the ignition resistant buildings or other safe areas on the site.

Based on the foregoing analysis, the Project is not anticipated to interfere or impede an adopted emergency response plan or emergency evacuation route during construction or operation. As such, impacts would be less than significant. (DEIR, pp. 4.9-16 to 4.9-20)

3.8.6 THRESHOLD G

Impact Statement: The Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

❑ Findings

Potential impacts of the Project related to Threshold g are discussed in detail in Section 4.9.5 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold g; therefore, no mitigation is required.

❑ Substantial Evidence

The Project site is designated within a "High" and "Very High" Fire Hazard Severity Zone within a state responsibility area (SRA) by the Riverside County General Plan and CalFire. CalFire has released an updated version of their fire hazard severity zone maps that, if adopted, would revise the fire hazard designation of the Project and its surroundings to all Very High rather than the current combination of Very High and High. (CalFire, 2023). Because of these designations, a Fire Protection Plan (FPP) was prepared. Adoption of CalFire's new fire hazard zone maps would not change the findings in the FPP, which was planned and prepared for the Project as if it was entirely within the Very High Fire Hazard Severity Zone. After being annexed into the City of Beaumont, it is possible that Project could be re-designated as Local Responsibility Area (LRA) in a future update of CalFire's hazard severity zone maps, which would mean the City of Beaumont would have the primary responsibility for the prevention and suppression of wildland fires at the Project site.

The Beaumont Pointe Specific Plan includes project design features to protect people and structures from wildfires. Currently, the Project site is undeveloped, disturbed, vacant and has hills in the south. The Project site's hills would remain undeveloped and would contain existing native and non-native

vegetation that would be susceptible to wildfire. Defensible space is defined as managed and maintained areas adjacent to structures that enable fire suppression activities through the removal of flammable fuels and maintenance of landscapes that would not readily transmit wildfire. The Project would incorporate defensible space in the form of modified fuel areas in two managed zones, a fuel maintenance zone and a fuel modification area (FMA). The Project would provide a fuel maintenance zone with 20 feet of irrigated vegetation around the perimeter of the Project site and a 100-foot FMA of paved surface and/or irrigated landscape. The implementation of the on-site defensible space (FMA and fuel maintenance zone) would reduce the risk of wildfire at the Project site and would improve the ability of firefighters to fight fires and protect the Project site and neighboring resources, irrespective of the cause or location of ignition. Additionally, all Project related plans will be reviewed and approved by the City and Riverside County Fire Department to ensure the safety of future Project occupants and structures. Accordingly, impacts due to wildland fires would be less than significant. (DEIR, p. 4.9-21)

3.8.7 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to hazards and hazardous materials.

- ❑ **Findings**

Potential cumulative impacts of the Project related to hazards and hazardous materials are discussed in detail in Section 4.9.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to hazards and hazardous materials; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

As discussed above under the responses to Thresholds "a" and "b," the Project's construction and operation would be required to comply with all applicable federal, State, and local regulations to ensure proper use, storage, and disposal of hazardous substances. Such uses also would be subject to additional review and permitting requirements by the RCDEH. Similarly, any other developments in the area proposing the construction of uses with the potential for use, storage, or transport of hazardous materials also would be required to comply with applicable federal, State, and local regulations, and such uses would be subject to additional review and permits from their local oversight agency. Therefore, the potential for release of hazardous materials into the environment, either through accidents or due to routine transport, use, or disposal of such materials would be mitigated for each development and would not result in a cumulatively considerable impact.

The Project site is not located within one-quarter mile of an existing or planned school. The nearest school, Three Rings Ranch Elementary School, is located approximately three (3) miles east of the Project site. Accordingly, the Project was determined to not have the potential to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, and/or wastes due to routine transport, use, or disposal of such materials within one-quarter mile of an existing or proposed school.

Therefore, implementation of the Project would not contribute to a cumulatively considerable impact associated with emissions within one-quarter mile of an existing or planned school.

The Project site is not located on the list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; therefore, the Project has no potential to contribute to substantial, cumulative effects related to the development or re-development of contaminated property.

As discussed above under the response to Threshold e, the Project would not be adversely affected by operations at the Banning Municipal Airport, as the Project site is located outside of the Airport Influence Area (RCALUC, 2004). Therefore, the Project would not result in a safety hazard or excessive noise for people residing or working in the Project area and would not contribute to a cumulatively considerable impact associated with airport hazards.

The Project site does not contain any emergency facilities, nor does it serve as an emergency evacuation route and the Project provides adequate ingress and egress as determined by the City and the Riverside County Fire Department.

As described above, adding the maximum number of vehicles from the Project's site would increase evacuation times for surrounding development between 16 minutes and 26 minutes. However, these scenarios are highly conservative as they assume that all parking spaces are fully occupied at both the proposed Project site and the Hidden Canyon Industrial Park site. Additionally, under all scenarios, the increase in evacuation time is associated with the proposed Project, and not the surrounding land uses, as the proposed Project is located on the furthest end of the study area, and vehicles from the surrounding land uses would reach the transportation network before vehicles from the proposed Project. The Project and surrounding development can be safely evacuated under the worst-case scenario (Scenario 14: Project with Hidden Canyon Industrial Park with SR-60 Only) and would not interfere or impede with an emergency evacuation route. Additionally, although the Project is not to be considered a shelter-in-place development, because the Project site would be highly ignition resistant in terms of its buildings and landscape/hardscape, it is anticipated that an additional option available to emergency managers in some wildfire and other emergency scenarios will be directing people to temporarily remain on site and seek refuge within the ignition resistant buildings or other safe areas on the site. When an evacuation is ordered, it will occur according to pre-established evacuation decision points or as soon as notice to evacuate is received, which may vary depending on many environmental and other factor.

The Project and cumulative development can be safely evacuated under the worst-case scenario and would not interfere or impede with an emergency evacuation route. Thus, there is no potential for the Project to contribute to any cumulative impacts associated with an adopted emergency response plan or emergency evacuation plan.

As discussed above under Threshold g, the Project site is located within an area identified by Cal Fire and Riverside County as a "High" and "Very High" fire hazard severity zone (Riverside County, 2015; Cal Fire, 2007). However, all development within high fire hazard severity zones is required to comply with the City's Weed Abatement Program and the Riverside County Fire Department requirements, in

order to minimize any potential fire risk. Additionally, all development in the area would require review and approval by the City's and Riverside County Fire Department to ensure the safety of future Project occupants and structures. Therefore, cumulative impacts associated with wildfire would be less than significant. (DEIR, pp. 4.9-21 to 4.9-22)

3.9 HYDROLOGY AND WATER QUALITY

Project impacts for CEQA Hydrology and Water Quality Thresholds a through e do not result in significant impacts and findings are discussed below.

3.9.1 REGULATORY REQUIREMENTS

The following Regulatory Requirements (RRs) are applicable regardless of CEQA and would apply to any project under similar circumstances and, therefore, do not constitute mitigation measures. However, they will nonetheless be included in the Project's Mitigation Monitoring and Reporting Program to ensure the implementation of the mandated RRs.

RR 10-1 Prior to grading plan approval and the issuance of a grading permit for the Beaumont Pointe Specific Plan developments, the Project proponent shall provide evidence to the City that a Notice of Intent (NOI) has been filed with the Regional Water Quality Control Board for coverage under the State National Pollutant Discharge Elimination System (NPDES) Construction General Permit for discharge of stormwater associated with construction activities.

RR 10-2 Prior to grading plan approval and the first issuance of a grading permit by the City for the Beaumont Pointe Specific Plan development, the Project proponent shall submit to the City of Beaumont a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall include a surface water control plan and erosion-control plan citing specific measures to control erosion during the entire grading and construction period. Additionally, the SWPPP shall identify structural and non-structural Best Management Practices (BMPs) to control sediment and nonvisible discharges from the site. BMPs to be implemented in the SWPPP may include (but shall not be limited to) the following:

- Sediment discharges from the site may be controlled by the following:
  - Perimeter protection to prevent sediment discharges through silt fences, fiber rolls, gravel bag berms, sand bag barriers, and compost socks;
  - Sediment capture and drainage control through sediment traps, storm drain inlet protection, and sediment basins;
  - Velocity reduction through check dams, sediment basins, and outlet protection/velocity dissipation devices;
  - Reduction in off-site sediment tracking through stabilized construction entrance/exit, construction road stabilization, and entrance/exit tire wash;

  - Slope interruption at permit-prescribed intervals (fiber rolls, gravel bag berms, sand bag berms, compost socks, biofilter bags).

- The construction and condition of the BMPs will be periodically inspected during construction, and repairs will be made when necessary as required by the SWPPP.
- No materials of any kind shall be placed in drainage ways.

- Materials that could contribute nonvisible pollutants to stormwater must be contained, elevated, and placed in temporary storage containment areas.

- All loose piles of soil, silt, clay, sand, debris, and other earthen material shall be protected per RWQCB standards to eliminate any discharge from the site. Stockpiles will be surrounding by silt fences.

- The SWPPP will include inspection forms for routine monitoring of the site during the construction phase to ensure NPDES compliance.

- Additional BMPs and erosion-control measures will be documented in the SWPPP and utilized if necessary.

- The SWPPP will be kept on site for the entire duration of project construction and will also be available to the local RWQCB for inspection at any time.

In the event that it is not feasible to implement the above BMPs, the City of Beaumont can make a determination that other BMPs will provide equivalent or superior treatment either on or off site.

RR 10-3 Prior to the issuance of each grading permit by the City of Beaumont for each phase of the Project, the Project proponent shall provide evidence to the City that the following provisions have been added to the construction contracts for the proposed work:

- The Construction Contractor shall be responsible for performing and documenting the application of BMPs identified in the SWPPP. Weekly inspections shall be performed on sediment-control measures called for in the SWPPP. Monthly reports shall be maintained by the Contractor and submitted to the City for inspection. In addition, the Contractor will also be required to maintain an inspection log and have the log on site to be reviewed by the City of Beaumont and the representatives of the Regional Water Quality Control Board.

RR 10-4 Prior to issuance of each grading permit by the City of Beaumont for each phase of the Project, the Project proponent shall receive approval from the City of Beaumont of a Final Water Quality Management Plan (Final WQMP). The Final WQMP shall specifically identify pollution-prevention, site-design, source-control, and treatment-control BMPs that shall be used on site to control predictable pollutant runoff to reduce

impacts to water quality to the maximum extent practicable after construction is completed and after the facilities or structures are occupied and/or operational. Source control BMPs to be implemented in the Final WQMP may include (but shall not be limited to) those listed in DEIR Table 4.10-3. Treatment-control BMPs shall include on-site detention/sand filtration basins to treat the site's runoff; these facilities shall be maintained and inspected at least twice per year and prior to October 1. Additional BMPs will be documented in the WQMP and utilized if necessary. In the event that it is not feasible to implement the BMPs identified in the Final WQMP, the City of Beaumont can make a determination that other BMPs shall provide equivalent or superior treatment either on or off site.

RR 10-5 Prior to the issuance of each building permit for the Project, the Project proponent shall provide evidence to the City that the Project complies with the requirements of the RWQCB Municipal Permit General MS4 Permit. The MS4 Permit requirements for new development calls for compliance with water quality regulatory requirements applicable to stormwater runoff and waste discharge. Specifically, the MS4 permit would require the Project proponent to develop and implement a comprehensive Stormwater Management Program (SWMP) that must include pollution prevention measures, treatment or removal techniques, monitoring, use of legal authority, and other appropriate measures to control the quality of stormwater discharged to the storm drains.

3.9.2 THRESHOLD A

Impact Statement: The Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.10.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

Construction-Related Water Quality Impacts

Construction-related activities have the potential to result in impacts to water quality. The grading and construction phases would require the disturbance of surface soils and removal of the existing vegetation cover. During the construction period, grading activities would result in exposure of soil to storm runoff, potentially causing erosion and sedimentation in runoff. Sediments also transport substances such as nutrients, hydrocarbons, and trace metals, which would be conveyed to the storm drain facilities and receiving waters. Substances such as fuels, oil and grease, solvents, paints and other building construction materials, wash water, and dust control water could also enter storm runoff and be transported to nearby waterways. This could potentially degrade the quality of the receiving waters and potentially result in the impairment of downstream water sources.

Construction activities for the Project would occur over an area more than one acre. Therefore, the Project is required to obtain coverage under an NPDES permit. Construction impacts due to Project development would be minimized through compliance with the NPDES Construction General Permit. As part of compliance with the NPDES requirements, a Notice of Intent (NOI) would be prepared and submitted to the SWRCB, and a Water Discharge Identification Number would be obtained prior to grading. This will provide notification and intent to comply with the State Construction General Permit. This permit requires the discharger to perform a risk assessment for the proposed development (with differing requirements based upon the determined risk level). As stated in Regulatory Requirement RR-2, the discharger must prepare and implement a SWPPP, which must include erosion-control and sediment-control BMPs that would meet or exceed measures required by the determined risk level of the construction site, in addition to tracking control, waste management, and site design BMPs that control construction-related pollutants. These measures may include the use of gravel bags, silt fences, straw wattles, hay bales, check dams, hydroseed, or soil binders (see Regulatory Requirement RR 10-2). The construction contractor would be required to operate and maintain these BMPs throughout the duration of on-site construction activities. A Construction Site Monitoring Program that identifies monitoring and sampling requirements during construction is a required component of the SWPPP. In addition, the construction contractor would be required to maintain an inspection log and have the log on site to be reviewed by the City and representatives of the RWQCB.

The NPDES permit program was established under Section 402 of the Clean Water Act (CWA), which prohibits the unauthorized discharge of pollutants, including municipal, commercial, and industrial wastewater discharges. An NPDES permit would generally specify an acceptable level of pollutants or pollutant parameters in a discharge. The permittee may choose which technologies to use to achieve that level. DEIR Table 4.10-3, *Construction Activity Best Management Practices*, lists BMPs for runoff control, sediment control, erosion control, and good housekeeping that may be used during the construction phase of the Project.

The construction-phase BMPs would ensure effective control of not only sediment discharge, but also of pollutants associated with sediments (e.g., nutrients, hydrocarbons, and trace metals). Mandatory compliance with regulatory requirements for the protection of water quality during construction (see Regulatory Requirements RR 10-1 through RR 10-3), including implementation of a SWPPP, would ensure that the Project does not violate any water quality standards or waste discharge requirements during construction activities. Therefore, impacts related to water quality and waste discharge associated with construction activities would be less than significant.

Post-Development Water Quality Impacts

Under existing conditions, the Project site is currently vacant and undeveloped, except for the portion of the site that contains the paved portion of Jack Rabbit Trail. The development of the Project and associated improvements would result in the conversion of existing on-site permeable surfaces to impermeable surfaces within PAs 1 through 8. The water runoff from impervious surfaces, including the proposed buildings, roadways, landscaped areas, and parking lots, have the potential to carry a variety of pollutants. A "pollutant of concern" is water pollutant that is also an impairment to the

receiving water body. Based on the Project-specific WQMP, potential water pollutants that could be generated from the Project site in its post-development condition include the following:

- Bacterial Indicators
- Metals (parking lots and loading docks)
- Nutrients (landscaping)
- Pesticides (landscaping)
- Toxic Organic Compounds (TOCs)
- Sediments (landscaping)
- Trash & Debris (waste container and parking lots)
- Oil & Grease (parking lots and loading docks)

These pollutants may lead to the degradation of stormwater quality in downstream water bodies. It should be noted that there would be a reduction in sediments with implementation of the Project as landscaped areas, impervious surfaces, and BMPs would reduce suspended sediment in runoff compared to the undeveloped existing condition.

Pollutant concentrations in urban runoff are extremely variable and are dependent on storm intensity, land use, elapsed time since previous storms, and the volume of runoff generated in a specific area that reaches a receiving water. As such, potential water quality impacts are related to the increase in the peak runoff, new urban uses, and the sensitivity of the receiving water. Santa Ana River – Reach 4 is impaired by pathogens; Santa Ana River – Reach 3 is impaired by copper, lead, pathogens, and nitrates; Prado Basin is impaired by nutrients; and Santa Ana River – Reach 2 is impaired by metals and indicator bacteria.

The MS4 Permit for new development requires compliance with water quality regulatory requirements applicable to stormwater runoff. The effectiveness of stormwater quality controls is primarily based on two factors: (1) the amount of runoff that is captured by the controls; and (2) the selection of BMPs to address identified pollutants of concern. Selection and numerical sizing criteria for new development treatment controls are included in the MS4 Permit. As part of the MS4 Permit, a SWMP will be prepared to include pollution prevention measures, treatment or removal techniques, monitoring, use of legal authority, and other appropriate measures to control the quality of stormwater discharged to the storm drains (see Regulatory Requirement RR 10-5).

A WQMP is required to reduce or eliminate water pollution caused by runoff that flows from stormwater drainage systems into receiving waters. A Project-specific Preliminary WQMP was prepared for the Project to identify appropriate BMPs for the Project. A Final Project-specific WQMP that is in substantial conformance with the approved Preliminary Project-specific WQMP shall be approved by the City prior to the issuance of grading permits (see Regulatory Requirement RR 10-4). As identified in the Project's Preliminary WQMP, low-impact development (LID) BMPs (e.g., bioretention and biotreatment) are proposed to detain stormwater on site. Additionally, the Project's Preliminary WQMP identifies site-design and structural and non-structural source-control BMPs that would be implemented for the Project. Furthermore, the Project includes mass grading of PAs 1 and 2,

which will remain graded and undeveloped until construction of the commercial uses in Phase 3. Under this interim condition, the mass graded pads are considered self-treating areas (no impervious area and gentle slopes) and storm drain lateral stub outs will be provided to connect the future onsite storm drain to the infrastructure storm drain system proposed by this project.

The Project would maintain the 16 existing culverts as the ultimate discharge locations for the property; however, runoff from the impervious surfaces (i.e., proposed buildings, parking lots, and road improvements) would be collected by the Project's proposed drainage system. The Project site would be divided into 17 drainage management areas (DMAs). The proposed drainage system would consist of catch basins, parking inlets, storm drain pipes with sizes varying from 18 inches to 48 inches, outlet structures, and four detention basins (Basins 1 – 4), one for each tributary area. The drainage system would route the runoff from the proposed impervious surfaces to the four detention basins. Where possible, runoff from impervious areas drain towards landscaped areas and bioretention basins through curb cutouts. All runoff from PAs 1 through 8 will enter the basins (Basins 1, 2, 3 & 4) for treatment and mitigation before discharging into their respective culverts. Runoff from streets and sidewalks from PAs 1 and 2 will enter Basin 5 located at the northeast corner of the property, adjacent to Jackrabbit Trail. Each culvert has natural depressed areas upstream which also acts as a natural detention area. Each basin would provide stormwater treatment for each of their respective tributaries. The proposed stormwater treatment basins will provide peak runoff mitigation before discharging to the culverts. The detention basins would remove pollutants from runoff and filter the water to meet the water quality standards of the SARWQCB pursuant to the design requirements of the LID BMP Design Manual. The LID BMP Design Manual requires that basins are designed to capture runoff from the 0.75 inch, 24-hour rainfall event or the 85th percentile, 24-hour rainfall event, whichever is greater; thereby providing first-flush capture, detention, and filtration of stormwater runoff before it is discharged from the Project site.

DEIR Table 4.10-4, *Permanent and Operational Source Control BMPs*, lists source-control BMPs that are incorporated into the Project to reduce the pollutants released into the environment. Source-control BMPs are permanent, structural features that would be included in Project plans and operational BMPs that would be implemented by the site's occupant or user.

In addition, with implementation of Regulatory Requirements RR 10-1 through RR 10-5, surface water that may percolate in to the soil would not adversely affect groundwater on or off site.

By complying with the NPDES permit and WQMP requirements, the Project would ensure effective control of and would not provide substantial additional sources of polluted runoff to receiving waters. Mandatory compliance with regulatory requirements for the protection of water quality (see Regulatory Requirements RR 10-4 and RR 10-5), would ensure that the Project does not violate any water quality standards or waste discharge requirements during operation. Therefore, water quality and waste discharge impacts associated with operation of the project would be less than significant. (DEIR, pp. 4.10-14 to 4.10-20)

3.9.3 THRESHOLD B

Impact Statement: The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the Project would impede sustainable groundwater management of the basin.

- ❑ **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.10.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold b; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

The Project's potable water would be provided by the Beaumont-Cherry Valley Water District (BCVWD). The BCVWD is the potable water supplier for the City, the City's SOI, and the unincorporated community of Cherry Valley, which is outside the City's SOI. According to the BCVWD 2020 Urban Water Management Plan (UWMP), BCVWD provides potable water from two local groundwater sources: Beaumont Basin and Edgar Canyon. The Beaumont Basin provides between 80 and 85% of the potable water available to the City annually and Edgar Canyon provides between 15 and 20% of the potable water available to the City annually (BCVWD, 2021).

According to the Water Supply Assessment (WSA) and Amendment #1 WSA (DEIR *Technical Appendix L1 and L2* of the DEIR), the Project's projected water demand is 196.7 acre-feet per year (AFY), of which 85.2 AFY is outdoor, non-potable water use. It should be noted that the Project site was included in the list of planned development projects within BCVWD's 2020 UWMP, which demonstrated that BCVWD has adequate water supplies under normal year, single-dry year, and multiple-dry year conditions through the year 2045. The 2020 UWMP estimates water demand for the Project site to be 360.26 equivalent dwelling units (EDUs), which is the same as the Project's total projected water demand. Additionally, the 2020 UMWP further defines BCVWD's and City's commitment to using non-potable water, available from the City's upgraded Title 22 recycled water treatment plant and shallow aquifer wells, which are not suitable for direct potable water supply. This is consistent with the approved WSA, which indicated 43.31% of the total demand could be supplied by BCVWD's non-potable water system. This further reduces Project's imported and local groundwater (potable) demand, from 360.26 EDUs to 204.21 EDUs. Therefore, groundwater supplies needed for Project development have been planned for and the Project would not substantially decrease groundwater supplies and impacts would be less than significant.

The BCVWD augments its groundwater supplies at the Beaumont Basin with imported water from the State Water Project provided by the San Gorgonio Pass Water Agency, which is recharged at BCVWD's approximately 80-acre recharge facility located on the east side Beaumont Avenue between Brookside Avenue and Cherry Valley Boulevard. This site has long-term percolation rates around 7 to 10 acre-feet per acre per day, with proper maintenance. Additionally, BCVWD has two active stream diversion locations with Edgar Canyon (Little San Gorgonio Creek). Currently, the BCVWD diverts streamflow in Edgar Canyon to a series of percolation ponds which recharge the shallow wells in Edgar

Canyon (BCVWD, 2021).The Project site is located approximately 3.9 miles southwest of the groundwater recharge facility for the Beaumont Basin and is located approximately 0.60 mile southwest of Little San Gorgonia Creek. Therefore, the Project site is not within the recharge areas for the Beaumont Basin or Edgar Canyon and would not substantially affect groundwater recharge. As such, based on the foregoing analysis, the Project is not anticipated to substantially interfere with groundwater recharge and impacts would be less than significant. (DEIR, pp. 4.10-20 to 4.10-21)

3.9.4 THRESHOLD C

Impact Statement: The Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.

❑ Findings

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.10.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ Substantial Evidence

Erosion and Siltation

The Project would include the installation of an integrated, on-site storm drain system consisting of catch basins, grated inlets, storm drain pipes with varying sizes, and four detention basins. The on-site storm drain system is designed to capture the on-site stormwater runoff flows, convey the runoff to the proposed detention basins, and treat the runoff to minimize water-borne pollutants transported from the Project site.

Although soils in the Project site could experience erosion during construction, implementation of the Project would not cause substantial soil erosion. A SWPPP specifying BMPs for minimizing pollution of stormwater with soil and sediment during Project construction would be prepared and implemented. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from Project-related grading and construction activities.

The Project would introduce impervious surfaces to the Project site, thereby reducing the amount of exposed soils on site as compared to existing conditions. As such, the implementation of the Project would reduce the erosion potential on site as compared to existing conditions and impacts would be less than significant. Additionally, as further discussed under Threshold c.B, below, the Project would result in a 100 cubic feet per second (cfs) reduction in peak stormwater runoff rates. Furthermore, the Project Applicant would be required to implement the requirements of the Project-specific WQMP, which includes the installation and maintenance of BMPs that would ensure no substantial erosion

impacts would occur off-site during operational activities. As such, impacts would be less than significant.

As summarized in the Project's Preliminary WQMP, the water quality treatment controls proposed (i.e., detention basin and catch basin filters) for the Project are effective at removing sediment from stormwater runoff during long-term operation. The City would require compliance with the WQMP and long-term maintenance of on-site stormwater conveyance and retention infrastructure by the property owner or operator to ensure their long-term effectiveness (Municipal Code Chapter 13.24). Therefore, stormwater runoff flows leaving the Project site would not create substantial erosion or result in a substantial amount of sediment, and impacts would be less than significant.

Stormwater Runoff

The Project's proposed grading, earthwork activities, and the addition of impervious surfaces on the Project site would alter the site's existing interior drainage characteristics. Although the Project would introduce impervious surfaces to the Project site, the Project would maintain a similar drainage pattern as compared to existing conditions. Under post-development conditions, the Project site would be divided into 17 DMAs, similar to pre-development conditions. The pre-development (existing) and post-development (proposed) DMAs represent different tributary areas but were created to maintain similar or less peak flows for each area which ultimately flow to its corresponding culvert, as shown on Figure 4.10-2 of the DEIR.

The 16 existing culverts would remain as the ultimate discharge locations for the Project site except for culverts 1 and 2, which will be replaced with a 20 foot by 20 foot reinforced concrete box (RCB) to be installed west of culvert 1 as part of the Caltrans SR-60 improvements. Additionally, runoff from the Project site would be captured by the proposed storm drainage system prior discharging to the existing culverts.

Prior to flows reaching the existing culverts and draining to San Timeteo Creek Reach 3, the Project would utilize on-site storm drainage systems consisting of parking inlets, catch basins, storm drain pipes (varying from 18 to 48 inches in diameter), outlet structures, a flow diversion structure, and four water quality basins. The Project's drainage system would route runoff from each DMA to the proposed stormwater treatment basins, which would reduce peak flows for each of their respective tributaries. The basins are designed in accordance with Riverside County *LID BMP Design Handbook* for the Santa Ana River Watershed and would provide the capacity to mitigate the peak runoff for the developed 100-year, 1-hour storm event. Specifically, the LID BMP Design Manual requires that basins are designed to capture runoff from the 0.75 inch, 24-hour rainfall event or the 85th percentile, 24-hour rainfall event, whichever is greater.

As shown in DEIR Table 4.10-1, under existing conditions, the Project site has a peak runoff volume of 1,482.4 cfs. DEIR Table 4.10-5, *Developed 100-Year Peak Flow Rates,* identifies the peak flow rates discharges from each DMA under Project conditions, which results in a total peak runoff volume of 1,384.4 cfs. Therefore, the implementation of the Project would result in an overall 100.9 cfs reduction in peak runoff.

By designing for the peak flow event, the capacity of the culverts would not be exceeded, and the natural detention areas would not flood. The proposed storm drainage system would ensure that the Project would result in a reduction in and therefore would not result in a substantial increase in rate or amount of runoff. Runoff from the Project, therefore, would not result in on- or off-site flooding or exceed existing or planned stormwater systems.

Each culvert has an existing natural drainage detention area located before the upstream inlets which will provide detention storage for the increased flow rates that exceed the calculated culvert capacity. Additionally, the diversion structure would restrict flows to culvert 13 to be no more than 138.8 cfs and divert overflows to culvert 11. DEIR Table 4.10-6, *Detention Basin 100-Year Peak Flow Capacity*, shows the Project's peak runoff and basin design capacity. The basins are designed with adequate capacity to accept 100-year, 1-hour storm events consistent with the Riverside County LID BMP Design Handbook for the Santa Ana River Watershed.

Compliance with the NPDES permit and WQMP requirements would ensure the Project would provide effective control and would not provide substantial additional sources of polluted runoff to receiving waters. Accordingly, the Project would not create or contribute runoff that would result in flooding on or off site or exceed the capacity of the existing or planned stormwater drainage system. Impacts would be less than significant. Furthermore, with implementation of the Project's LID and during construction activities, SWPPPs, the Project would not contribute substantial amounts of polluted runoff that could adversely affect the downstream bodies of water.

Flood Flows

The Project site is not within a 100-year floodplain, as mapped on the FEMA FIRM (FEMA, 2014). As such, the implementation of the Project has no potential to impede or redirect flood flows following the construction of the Project. No impacts would occur. (DEIR, pp. 4.10-21 to 4.10-24)

3.9.5 THRESHOLD D

Impact Statement: The Project would not result in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

❑ Findings

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.10.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold d; therefore, no mitigation is required.

❑ Substantial Evidence

The Project site is within Flood Zone X, which is an area of minimal flooding (FEMA, 2014). As such, the Project site is not anticipated to result in the release of pollutants due to 100-year flooding. No impacts would occur. The Project site is approximately 50 miles east of the Pacific Ocean (Google Earth, 2021). Due to this distance the Project site would not be exposed to the threat of inundation due to a tsunami. As such, no impacts would occur. A seiche is the formation of large waves in landlocked

bodies of water due to seismic activity. The Project site is not within proximity to an enclosed or partially enclosed body of water. As such, the Project site would not be exposed to the threat of inundation due to a seiche. As such, no impacts would occur. The Project is not anticipated to release pollutants due to Project inundation within a flood hazard, tsunami, or seiche and no impacts would occur. (DEIR, pp. 4.10-24 to 4.10-25)

3.9.6 THRESHOLD E

Impact Statement: The Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

- **Findings**

Potential impacts of the Project related to Threshold e are discussed in detail in Section 4.10.6 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold e; therefore, no mitigation is required.

- **Substantial Evidence**

The Project site is within the purview of the Santa Ana Regional Water Quality Control Board (SARWQCB); therefore, Project-related construction and operational activities would be required to comply with the Santa Ana River Basin Water Quality Control Plan by preparing and adhering to a Project-specific SWPPP and WQMP and by installing and maintaining BMPs. Therefore, implementation of the Project would not conflict with or obstruct the Santa Ana River Basin Water Quality Control Plan and no impacts would occur.

Under the SGMA passed in 2014 (California Water Code Section 10729[d]), each high and medium priority basin, as identified by the California Department of Water Resources (DWR), is required to have a Groundwater Sustainability Agency (GSA) that will be responsible for groundwater management and development of a Groundwater Sustainability Plan (GSP) (DWR, 2020a). As previously discussed, the Project site is within the Upper Santa Ana Valley – San Timoteo Groundwater Basin, which is categorized as a "very-low priority" basin; therefore, the Upper Santa Ana Valley – San Timoteo Groundwater Basin is not subject to the requirements of SGMA (DWR, 2021). Accordingly, the Project is not anticipated to conflict with or obstruct implementation of a sustainable groundwater management plan. No impacts would occur.

Furthermore, with implementation of the Project's LID and, during construction activities, SWPPPs, the Project would not contribute amounts of polluted runoff that could adversely affect the underlying groundwater basin. Additionally, as previously discussed in the response to Threshold b, the Project would not interfere substantially with groundwater recharge. As such, the Project would not conflict with any water quality control plans or sustainable groundwater management plans, and no impacts would occur. (DEIR, p. 4.10-25)

3.9.7 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in cumulatively considerable impacts related to hydrology and water quality.

❑ Findings

Potential cumulative impacts of the Project related to hydrology and water quality are discussed in detail in Section 4.10.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to hydrology and water quality; therefore, no mitigation is required.

❑ Substantial Evidence

The cumulative impact analysis considers potential hydrology and water quality effects of the Project in conjunction with other development projects in the vicinity of the Project site as well as other projects located within the Santa Ana River Basin and the Upper Santa Ana Valley – San Timoteo Groundwater Basin.

Project construction and the construction of other development projects in the cumulative study area would have the potential to contribute waterborne pollution, including erosion and sedimentation, to the Santa Ana River Watershed. As discussed under Thresholds a and e, pursuant to the requirements of the State Water Resources Control Board and the SARWQCB, all construction projects that disturb one (1) or more acre of land are required to obtain a NPDES permit and obtain coverage for construction activities. To obtain coverage, an effective site-specific SWPPP is required to be developed and implemented for each project. The SWPPP must identify potential on-site pollutants and identify an effective combination of erosion control and sediment control measures to reduce or eliminate discharge of pollutants to surface waters. In addition, the Project Applicant and all cumulative developments in the Santa Ana River Basin would be required to comply with the SARWQCB's Santa Ana River Basin Water Quality Control Program, which establishes water quality standards for ground and surface waters of the region. Compliance with these mandatory regulatory requirements would ensure that development projects within the Santa Ana River Watershed, including the Project, would not contribute substantially to water quality impairments during construction; therefore, the Project would not contribute to a cumulatively considerable impact.

Operational activities on the Project site would be required to comply with the Project's WQMP to minimize the amount of waterborne pollution discharged from the site. Other development projects within the watershed would similarly be required by law to prepare and implement site-specific WQMPs to ensure that runoff does not substantially contribute to water quality violations for surface water or groundwater. Compliance with the Santa Ana Region MS4 Permit, the Riverside County Drainage Area Management Plan – Santa Ana Region (DAMP) would ensure that the cumulative contribution of pollutants in the Santa Ana River Basin and the Upper Santa Ana Valley – San Timoteo Groundwater Basin would not be cumulatively considerable. Accordingly, operation of the Project would not contribute to cumulatively considerable water quality effects.

As discussed under Threshold b, the Project site is under the purview of the BCVWD, which provides potable water services to the City, the City's SOI, and the community of Cherry Valley. BCVWD's water supply comes from two groundwater basins, Edgar Canyon and Beaumont Basin. The Project is consistent with BCVWD's UWMP and there are no components of the Project that would conflict, on a direct or cumulative basis, with BCVWD's Groundwater Management Plan policies. Additionally, although the development of the Project would add impervious surfaces to the Project site, the Project would not directly interfere with groundwater recharge for the BCVWD because the Project site is not within the recharge area for Edgar Canyon and Beaumont Basin. The Project would not result in a cumulatively considerable impact to groundwater supplies or interfere with groundwater recharge.

Construction of development projects within the Santa Ana River Watershed would alter existing ground contours throughout the basin, which would result in changes to the basin's existing drainage patterns. As discussed above in Threshold (c), development projects, including the proposed Project, would be required to comply with federal, State, and local regulations to minimize stormwater pollution during construction (including erosion and siltation). Accordingly, grading plans would be required to be designed to preclude undue soil erosion and development projects would be required to prepare and implement SWPPPs and WQMPs to ensure that substantial soil erosion and/or sedimentation would not occur during temporary construction conditions or long-term operating conditions. Because the Project and all other developments throughout the Santa Ana River Watershed would need to comply with applicable federal, State, and local regulations, substantial cumulative erosion and/or siltation would not occur.

There are no conditions associated with the Project that would affect on- or off-site flooding and mandatory compliance with BCVWD or Riverside County Flood Control and Water Conservation District for site drainage by other projects within the cumulative study area would preclude the potential for other projects to increase the flood potential in the cumulative study area. Therefore, the proposed Project would not result in a cumulatively considerable impact associated with flood hazards. The implementation of the Project would result in a decrease in peak flows discharging from the site under a 100-year storm event. The Project would not contribute runoff water that would exceed the capacity of an existing or planned stormwater system. Therefore, the Project would not result in a cumulatively considerable impact.

The Project site is not within a 100-year flood plain and there are no large bodies of enclosed water in proximity to the Project site or cumulative study area. Additionally, there are no dams within the vicinity of the Project that could expose the Project to flooding due to inundation. Moreover, the City and its SOI are not located in proximity to a coastal body of water; therefore, the City would not be subject to tsunami hazards. Other project in the area would be required to comply with BCVWD or RCFC&WCD requirements to reduce flooding hazards. Therefore, the Project would not result in a cumulative considerable impact related to inundation and the release of pollutants.

Furthermore, as discussed in the response to Threshold e, the Project has no potential to conflict with any water quality control plans or sustainable groundwater management plans on a direct basis. As such, the Project would also have no potential to conflict with such plans on a cumulative basis. (DEIR, pp. 4.10-25 to 4.10-27)

3.10 LAND USE AND PLANNING

Project impacts for CEQA Land Use and Planning Thresholds a and b do not result in significant impacts and findings are discussed below.

3.10.1 THRESHOLD A

Impact Statement: The Project would not physically divide an established community.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.11.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

Currently the 539.9-acre Project site is vacant and undeveloped, except for the eastern portion of the site that contains the paved portion of Jack Rabbit Trail. The Project Applicant proposes to develop the Project site with an Industrial/Commercial Park. There are no existing established communities surrounding the Project site. The area east of the Project site is designated for and developed with similar industrial/commercial uses. The nearest established residential community to the Project site is located approximately 0.84-mile northeast on the opposite side of SR-60. It should be noted that there is one existing single-family residence located approximately 483 feet south of the Project site's southernmost boundary. However, the Project would not restrict access to or from the existing residence, and the Project would provide private residential access to the existing residence via the relocated Jack Rabbit Trail. Access to this residence will be maintained throughout construction and operation of the Project. Therefore, the implementation of the Project on the Project site is not anticipated to physically divide an established community and impacts would be less than significant. (DEIR, p. 4.9-8)

3.10.2 THRESHOLD B

Impact Statement: The Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

❑ Findings

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.11.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold b; therefore, no mitigation is required.

- **Substantial Evidence**

The DEIR analyzes the physical environmental effects associated with all components of the Project, including Project construction and operation. Governmental approvals requested from the City include a General Plan Amendment (GPA; PLAN2019-0284), Pre-zone (PLAN2019-0284), Beaumont Pointe Specific Plan (SP2019-0003), Vesting Tentative Parcel Map (VTPM) No. 38161, and a Development Agreement (DA; PLAN2023-0906). The Beaumont Pointe Specific Plan is referred to herein as Specific Plan. The Project's consistency with land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect is discussed below. The Project is also consistent with the Beaumont General Plan and Zoning Ordinance, SCAG's Connect SoCal, and the Western Riverside County MSHCP as discussed below.

City of Beaumont General Plan

The Beaumont General Plan Land Use and Community Design Element designates the Project site as Rural Residential 1. The Project Applicant's proposed GPA PLAN2019-0284 would amend the City's General Plan Land Use Map to modify the land use designations for the Project site from "Rural Residential" to "Industrial (I)," "General Commercial (GC)," "Open Space (OS)," and "Open Space-Conservation (OS-C)." With the approval of the proposed Project, any future development plans and entitlement applications (tract maps, site plans, and other similar entitlements) would be required to comply with the Specific Plan and substantially conform to the standards and guidelines set forth in the other sections of the Specific Plan, as well as any other applicable City's regulations. Although the Project would result in a change to the General Plan land use designations for the Project site to allow for implementation of the Specific Plan, these changes would not result in a conflict with applicable plans, polices, or regulations adopted for the purpose of avoiding or reducing an environmental effect, as demonstrated below. Accordingly, a less-than-significant environmental impact would result from the Project's proposed governmental approvals.

DEIR Table 4.11-1, *General Plan Applicability Analysis*, provides an analysis of the Project's consistency with all applicable General Plan goals and policies that were adopted for the purpose of avoiding or mitigating an environmental effect. As shown in DEIR Table 4.11-1, the Project would not result in any inconsistency with any of the applicable General Plan goals and policies. Accordingly, the Project would have a less-than-significant impact with respect to a conflict with the Beaumont General Plan.

City of Beaumont Zoning Ordinance

The City's Zoning Ordinance is contained within Title 17 of the City's Municipal Code and establishes specific standards for the use and development of all properties within the City by regulating land uses, development intensity, including limits on building setbacks, landscaping standards, and building heights. Under existing conditions, the Project site is zoned as W-2-20 under Riverside County Ordinance No. 348. Since the Project site is within the City's SOI within unincorporated Riverside County, the City has not adopted any zoning designations for the site. The City may pre-zone property within its SOI, which would become effect at the time that an annexation becomes effective.

The Project Applicant proposes to annex and incorporate the Project site into the City. As such, the Project Applicant is proposing Pre-Zone PLAN2019-0283 to amend the City's Zoning Map to include the Project site and classify the Project site as "Specific Plan (Beaumont Pointe Specific Plan)". The application of the Beaumont Pointe Specific Plan Zone would allow the Project to be developed in accordance with Section 3, *Development Standards*, of the Specific Plan, which would constitute the zoning regulations applicable to any future development within the Project site. The City's approval and implementation of PLAN2019-0283 would ensure that the Project would be consistent with the proposed zoning regulations identified in the Specific Plan. Based on the foregoing, the Project would have a less-than-significant impact with respect to a conflict with the City's Zoning Ordinance.

Connect SoCal

SCAG's Connect SoCal is the applicable SCAG planning document that applies to the Project. Connect SoCal identifies voluntary best practices to approach growth and infrastructure challenges in an integrated and comprehensive way. The Connect SoCal goals are meant to provide guidance for considering proposed project for municipalities throughout the SCAG jurisdictional area within the context of regional goals and policies. As shown in DEIR Table 4.11-2, *SCAG Connect SoCal Consistency Analysis*, implementation of the Project would not result in an inconsistency with the adopted *Connect SoCal*. Accordingly, the Project would have a less-than-significant impact with respect to a conflict with the SCAG's *Connect SoCal*.

Western Riverside County MSHCP

The Project site is in the MSHCP Criteria Area, including the Pass Area Plan (Cells 933, 936, 1030, 1032, and 1125) and the Reche Canyon/Badlands Area Plan (Cell Group A'). The Biological Resources Assessment (DEIR *Technical Appendix C1*) evaluated the Project's consistency with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures). As discussed in DEIR Section 4.4, *Biological Resources*, the Project would be consistent with the West Riverside County MSHCP. Refer to Threshold f under DEIR Section 4.4, *Biological Resources*, and Section 7.0 of the Project's Biological Resources Assessment (DEIR *Technical Appendix C1*) for a detailed discussion on the Project's consistency with the Western Riverside County MSHCP.

Implementation of the Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including the City's General Plan or Zoning Ordinance, *Connect SoCal*, or Western Riverside County MSHCP. (DEIR, pp. 4.11-8 to 4.11-43)

3.10.3 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impacts related to land use and planning.

❑ Findings

Potential cumulative impacts of the Project related to land use and planning are discussed in detail in Section 4.11.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to land use and planning; therefore, no mitigation is required.

❑ Substantial Evidence

This cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site that are located in unincorporated Riverside County, and cities of Beaumont and Banning. As discussed under Threshold a, the Project would not physically divide an established community because the Project site is vacant and undeveloped and is within a developing portion of the City. Although there is one existing single-family residence located immediately south of the Project site, implementation of the Project would not obstruct access to and from the existing single-family residence. Therefore, the Project would have a less than cumulatively considerable impact with respect to the physical division of an established community.

As discussed under Threshold b, the Project would not conflict with any other aspects of the City's General Plan or any other applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating adverse environmental effects. Cumulative development would also be subject to site-specific environmental and planning reviews that would address consistency with adopted land use plans, policies, or regulations. Thus, it is expected that the land uses of cumulative projects would be consistent with policies that avoid an environmental effect; therefore, cumulatively considerable impacts from cumulative projects related to policy consistency would be less than significant. (DEIR, pp. 4.11-44)

3.11 MINERAL RESOURCES

Project impacts for CEQA Mineral Resources Thresholds a and b do not result in significant impacts and findings are discussed below.

3.11.1 THRESHOLD A

Impact Statement: The Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.12.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ **Substantial Evidence**

According to the City's General Plan, the City has no known identified mineral resources of regional or statewide importance. The Project site is located MRZ-3, which is defined as an area where the significance of the deposit is undetermined (City of Beaumont, 2020b, Figure 5.11-1). Therefore, the Project site does not contain any known mineral resources that would be of value to the region or the residents of the State. Consistent with the findings of the General Plan EIR, no impacts to "known mineral resources" would occur with Project implementation (City of Beaumont, 2020b, pp. 5.11-7). In addition, there are no delineated sites or locations of mineral resources within the City (City of Beaumont, 2020a, p. 211). Therefore, the potential for the implementation of the Project to result in the loss of availability of a known mineral resource that would be of value to the region and residents of the State is considered less than significant. (DEIR, p. 4.12-4)

3.11.2 THRESHOLD B

Impact Statement: The Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

❑ **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.12.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold b; therefore, no mitigation is required.

❑ **Substantial Evidence**

According to the County's General Plan, the Project site is within the MRZ-3 zone and not located within close proximity to the State designated Aggregate Mineral Resource areas (Riverside County, 2015). Additionally, according to the City's General Plan, the Project site is not located within an area known to be underlain by locally-important mineral resources (City of Beaumont, 2020b, Figure 5.11-1). The Project site is not located within the City's Mineral Resource Overlay and the City's General Plan does not identify any locally-important mineral resource recovery sites on site or within proximity to the Project site (City of Beaumont, 2020b, p. 5.11-7). Additionally, as a future implementing action following adoption of the General Plan 2040, the City will delete the Mineral Resource Overlay from the City's Zoning Ordinance. Therefore, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan and impacts would be less than significant. (DEIR, p. 4.12-4)

3.11.3 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to mineral resources.

❑ **Findings**

Potential cumulative impacts of the Project related to mineral resources are discussed in detail in Section 4.12.7 of the DEIR. The City finds that the development of the proposed Project would not

result in significant cumulative impacts related to mineral resources; therefore, no mitigation is required.

❑ Substantial Evidence

As discussed under Threshold a, the Project site is classified as MRZ-3 in the County's and City's General Plan and contains no known mineral resource deposits. Furthermore, there are no delineated sites or locations of known mineral resources within the City. Therefore, the Project has no potential to result in a cumulatively considerable contribution to impacts related to mineral resources that would be of value to the region and residents of the state.

As discussed under Threshold b, the County and City's General Plan does not identify any locally-important mineral resource recovery sites on the Project site or within proximity to the Project site. Therefore, the Project has no potential to result in a cumulatively considerable contribution to impacts to a locally-important mineral resource recovery site. (DEIR, pp. 4.12-4 to 4.12-5)

3.12 NOISE

Except as indicated, Project impacts for CEQA Noise Thresholds a, b and c do not result in significant impacts and findings are discussed below.

3.12.1 THRESHOLD A

Impact Statement: The Project would not generate a substantial temporary or permanent increase in ambient noise levels during construction or on-site operation, in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies[2].

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.13.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold a for construction or on-site operation; therefore, no mitigation is required for these.

❑ Substantial Evidence

The findings below summarize the Project's potential construction noise levels and on-site operational noise levels.

Construction Noise Impact Analysis

Construction activities on the Project site would proceed in four stages: 1) grading; 2) building construction; 3) paving; and 4) architectural coating. These activities would create temporary periods of noise when heavy construction equipment (i.e., tractors, trucks, excavators, generators, pavers) is in operation and would cause a short-term increase in ambient noise levels. The Project construction noise

[2] Off-site traffic noise from Project operation would be significant and addressed under Section 5.3, below.

levels at nearby receiver locations are summarized in DEIR Table 4.13-7, *Project Construction Noise Levels*.

Project-related construction activities are expected to occur on weekdays (and, potentially, on Saturdays) during the hours when the City's Municipal Code does not restrict construction noise. The City's Municipal Code Section 9.02.110.F.2 exempts construction activities from noise restrictions so long as construction activities occur between the hours of 6:00 a.m. to 6:00 p.m. (June through September) and 7:00 a.m. to 6:00 p.m. (October through May). In accordance with the City's Municipal Code Section 9.02.110.F.4, if the building official should determine that the public health and safety will not be impaired by the construction related noise, the building inspector may issue a permit for construction within the hours of 6:00 p.m. and 7:00 a.m., upon application being made at the time the permit for the work is awarded or during the progress of the work. The building official may place such conditions on the issuance of the permit that are appropriate to maintain the public health and safety, as determined by the building official.

Using the reference construction equipment noise levels and the CadnaA noise prediction model, calculations of the Project construction noise level impacts at the nearest sensitive receiver locations were completed. To assess the construction equipment noise levels, the Project construction noise analysis relies on the highest noise level impacts when the equipment with the highest reference noise level is operating at the closest point from the edge of primary construction activity (Project site boundary) to each receiver location. As shown on DEIR Table 4.13-7, the highest construction noise levels are expected to range from 61.2 to 73.4 dBA Leq at the nearest receiver locations.

Acceptable exterior construction noise level threshold is based on the City's 55 dBA Leq interior noise level limit and the 20 dBA noise reduction associated with typical building construction. As shown in DEIR Table 4.13-7, Project construction would not cause noise levels at receiver locations to exceed 75 dBA Leq. Accordingly, Project construction would not result in substantial noise-related health safety hazards and impacts would be less than significant.

In addition, rock blasting may be required to support Project construction, therefore, this analysis considers the potential blasting noise levels at the nearest noise sensitive receiver locations. The airblast levels from Project blasts are based on the ISEE's Blasters' Handbook equation for partially and substantially confined construction blasts, determined based on the anticipated depth of hard rock in each location. This analysis describes partially confined airblast levels since they are calculated using the Blasters' Handbook equation for general construction blasting activities. The blasting impacts described below represent the worst-case (closest) blast locations describing the potential impacts when measured from the edge of the nearest blast area to the nearest receiver location. When measured at greater distances, the blasts will result in lower airblast noise levels. DEIR Table 4.13-8, *Project Blasting and Compliance Summary*, shows the calculated airblast levels, which are expected to range from 88 to 111 dB. The Project airblast noise levels are shown to satisfy the 133 dB airblast threshold at the nearest noise sensitive residential receiver locations. Therefore, the Project-related airblast noise level impacts would be less than significant. (DEIR pp. 4.13-20 to 4.13-22)

Nighttime Concrete Pour

Nighttime concrete pouring activities will occur as a part of Project building construction activities. The noise levels associated with the nighttime concrete pour activities are estimated to range from 26.8 to 45.4 dBA L_{eq}. Nighttime concrete pour activities would not exceed the construction noise level threshold at all the nearest noise sensitive receiver locations. Therefore, the noise impacts due to Project construction nighttime concrete pour noise activity are considered less than significant at all receiver locations with prior authorization for nighttime work from the City. (DEIR pp. 4.13-22 to 4.13-23)

Operational Noise Impact Analysis – Stationary Noise

Stationary (on-site) noise sources associated with long-term Project operation are expected to include loading dock activity, delivery van activity, truck movements, roof-top air conditioning units, parking lot vehicle movements, drive-through speakerphone activity, and trash enclosure activity. The operational stationary noise analysis is based on reference noise level measurements collected from similar types of activities to represent the noise levels expected with the development of the Project. (DEIR pp. 4.13-23 to 4.13-25)

DEIR Table 4.13-10, *Project Daytime Operational Noise – Stationary Noise*, shows the Project operational noise levels during the daytime hours of 7:00 a.m. to 10:00 p.m. The daytime hourly noise levels at the off-site receiver locations are expected to range from 32.1 to 43.6 dBA Leq. DEIR Table 4.13-11, Project Nighttime Operational Noise -Stationary Noise, shows the Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. Project operational noise levels during the nighttime hours of 10:00 p.m. to 7:00 a.m. at the off-site receiver locations are expected to range from 32.0 to 42.7 dBA L_{eq}.

Project stationary noise would not expose nearby receivers to unacceptable daytime or nighttime noise levels during Project operations following Project buildout (see Table 4.13-12, *Project Operational Noise – Stationary Noise*). Accordingly, Project operation would not result in the exposure of receivers near the Project site to stationary noise levels that exceed the exterior noise level standards established in the City's Municipal Code. Impacts would be less than significant.

Noise levels that would be experienced at receiver locations when unmitigated Project-source noise is added to the ambient daytime, evening, and nighttime conditions are presented on DEIR Table 4.13-13, *Project Operational Noise Level Contributions – Daytime*, and Table 4.13-14, *Project Operational Noise Level Contributions – Nighttime*, respectively. As shown, the Project would not contribute an operational noise level increase during the daytime or nighttime hours. To describe the amount to which a given noise level increase is considered substantial, the City's General Plan EIR outlines criteria to evaluate the incremental noise level increase and establishes a method for comparing future project noise with existing ambient conditions. In effect, the amount to which a given noise level increase is considered acceptable is reduced based on existing ambient noise conditions. The Project-related operational noise level increases will satisfy the operational noise level increase criteria at the nearest sensitive receiver locations. On this basis, although the Project would increase noise levels in the Project vicinity, Project operational stationary-source noise would not result in a substantial temporary/periodic, or permanent increase in ambient noise levels in the Project vicinity above levels

existing without the Project. Noise impacts associated with long-term on-site operations would be less than significant. (DEIR pp. 4.13-25 to 4.13-28)

3.12.2 THRESHOLD B

Impact Statement: The Project would not generate excessive groundborne vibration or groundborne noise levels.

❑ Findings

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.13.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold b; therefore, no mitigation is required.

❑ Substantial Evidence

The metric used to evaluate whether the Project's vibration levels are considered "excessive" during either construction or operation is adapted from Federal Transit Administration (FTA), Transit Noise and Vibration Impact Assessment Manual. Accordingly, the FTA criterion of 78 VdB is used to assess impacts due to groundborne vibration.

Construction activities on the Project site would utilize construction equipment that has the potential to generate vibration. Vibration resulting from construction activities on the Project site was calculated at the same five receiver locations that were evaluated in the construction noise analysis. DEIR Table 4.13-23, Project Construction Vibration Levels, summarizes Project construction vibration levels at the modeled receiver locations and the significance of the vibration levels using the FTA vibration level significance threshold of 78 VdB. All receiver locations in the vicinity of the Project site would be exposed to vibration levels that fall far below the applicable significance threshold (i.e., 78 VdB). Impacts would be less than significant.

In addition, rock blasting may be required to support Project construction; therefore, this analysis considers the potential blasting vibration levels at the nearest noise sensitive receiver locations. DEIR Table 4.13-24, *Project Blasting Vibration and Compliance Summary*, shows the calculated vibration levels from the worst-case (closest) Project blasting activities. As shown, the vibration levels of Project blasts are expected to range from 0.00 to 0.05 in/sec PPV based on the distances to nearby residential noise sensitive receiver locations. The Project blasting vibration levels will remain below the maximum acceptable transient peak-particle-velocity (PPV) vibration threshold 0.5 PPV (in/sec) at the nearby noise sensitive residential receiver locations. Therefore, the Project-related airblast vibration level impacts would be less than significant. Accordingly, Project construction would not generate temporary, excessive groundborne vibration or noise levels and a less than significant impact would occur. (DEIR, pp. 4.13-35 to 4.13-36)

3.12.3 THRESHOLD C

Impact Statement: The Project would not expose people residing or working in the project area to excessive noise levels due to airport noise.

❑ Findings

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.13.7 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ Substantial Evidence

The Project site is not located within two miles of a public airport or within an airport land use plan. The closest major airport is the March Air Reserve Base located roughly 12 miles west of the Project site. Therefore, the Project site would not be exposed to excessive noise levels from airport operations and no impact would occur. (DEIR, p. 4.13-36)

3.12.4 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in cumulatively considerable impacts related to noise (construction-related or on-site operational noise).

❑ Findings

Potential cumulative noise impacts of the Project related to construction and on-site operation are discussed in detail in Section 4.13.8 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to noise for these two effects; therefore, no mitigation is required.

❑ Substantial Evidence

Substantial Noise Increase or Violations

Short-Term Cumulative Construction-Noise Impacts

This cumulative impact analysis considers development of the Project in conjunction with other development projects in the vicinity of the Project site. Cumulative impacts would potentially occur if other projects are being constructed in the vicinity of the proposed Project at the same time. There are three projects identified in the Traffic Analysis (DEIR *Technical Report J1*) within approximately a quarter-mile radius of the proposed Project, listed below.

1. B2, Fairway Canyon SCPGA (3,300 residential units)
2. B4, Heartland (Olivewood; 981 residential units)
3. B5, Hidden Canyon Industrial (2,890,000 sf industrial)

All three projects are already under construction, and construction would be complete for the nearest related project (B5) prior to grading activities for proposed Project. Therefore, overlapping construction phases between that project and the Project would be minimal. Additionally, the two related projects (B2 and B4) are located across the SR-60 Freeway and would not combine with Project-related construction to result in cumulatively considerable construction-related noise impacts.

Construction activities associated with the Project, especially activities involving heavy equipment and blasting, would create intermittent periods of noise when construction equipment is in operation and cause a short-term increase in ambient noise levels. As shown in Table 4.13-7, the peak noise level anticipated during construction activities are estimated to reach a maximum noise level of 73.4 dBA Leq at receiver R5 (represents the existing noise sensitive residence at 13270 Jack Rabbit Trail (Hoy Ranch), approximately 92 feet south of the Project site) which does not exceed the construction noise threshold of 75 dBA Leq. Additionally, as shown in Table 4.13-8, Project airblast noise levels are shown to satisfy the 133 dB airblast threshold at the nearest noise sensitive residential receiver locations. As shown in Table 4.13-9, noise impacts due to Project construction nighttime concrete pour noise activity would not exceed the construction noise threshold of 75 dBA Leq. Therefore, Project construction-related activities would result in less than significant noise impacts.

Because the Project's construction noise levels would be less than significant, construction noise would be temporary in nature, and the Project and other cumulative projects would not combine with Project-related construction, cumulative construction impacts would be less than significant. (DEIR, pp. 4.13-36 to 4.13-37)

Long-Term Cumulative Stationary Noise Impacts

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects in the vicinity of the Project site. As shown in DEIR Table 4.13-12, the Project would not result in an increase in the cumulative noise levels at sensitive receiver locations. The nearest sensitive receptor (R5) is located approximately 92 feet from the Project and 850 feet from the nearest related project (B5, Hidden Canyon Industrial). As shown on DEIR Table 4.13-9, Project's operational activities are below the established day and nighttime noise thresholds. Operational noise levels would not combine with operational noise levels from the nearest related project (B5, Hidden Canyon Industrial) to cause or contribute to the exposure of sensitive receptors to noise levels in excess of applicable standards. Consistent with the cumulative impact significance thresholds outlined in the Air Quality Impact Analysis (DEIR *Technical Appendix B1*), this noise analysis uses the same operational significance thresholds for project specific and cumulative impacts as discussed in Section 4.13.6A.2. Therefore, since the Project operational-noise levels satisfy the thresholds, the proposed Project operational activities are considered less than significant on a project-specific and cumulative basis. In addition, the City's General Plan Noise Element and Municipal Code Section 9.02.050 identify stationary-source policies and noise level limits to control and abate potential environmental noise level impacts. The two other related projects (B2 and B4) are located across the SR-60 Freeway from the Project site and operational noise would not be additive. Accordingly, the Project would have less than significant direct and cumulative stationary operational noise impacts. (DEIR, pp. 4.13-37 to 4.13-38)

Groundborne Vibration and Noise

The types of construction equipment that would be used to implement the Project would not create vibration amplitudes that could cause structural damage to nearby structures. The nearest existing off-site structures would not be exposed to substantial ground-borne vibration due to the temporary operation of heavy construction equipment on the Project site. Additionally, as shown in DEIR Table

4.13-24, Project blasting vibration levels will remain below the maximum acceptable transient peak-particle-velocity (PPV) vibration threshold 0.5 PPV (in/sec) at the nearby noise sensitive residential receiver locations. Since construction would be complete for the nearest related project (B5) prior to grading activities for the proposed Project, overlapping construction phasing between that project and the Project is not expected to occur and construction vibration would not be additive. Additionally, the two related projects (B2 and B4) are located across the SR-60 Freeway and would not combine with Project-related construction to result in cumulatively considerable construction-related noise impacts.

Under long-term operating conditions, the Project would not involve the use of equipment, facilities, or activities that would result in perceptible groundborne vibration. In addition, there are no sources of substantial groundbourne-vibration associated with the Project or related projects. Accordingly, groundborne vibration and noise impacts would not be cumulatively considerable. (DEIR, p. 4.13-38)

Noise from Airport Operations

As stated, the Project site is not located within two miles of a public airport or within an airport land use plan. The closest major airport is the March Air Reserve Base located roughly 12 miles west of the Project site. Therefore, the Project site would not contribute to the exposure of excessive noise levels from airport operations. Accordingly, noise impacts related to public airport or public use airport would not be cumulatively considerable. (DEIR, p. 4.13-38)

3.13 POPULATION AND HOUSING

Project impacts for CEQA Populations and Housing Thresholds a and b do not result in significant impacts and findings are discussed below.

3.13.1 THRESHOLD A

Impact Statement: The Project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.14.5 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

Construction

The Project would be developed over a 56-month construction period with final buildout anticipated in 2027. Project construction activities would require contractors and laborers. It is anticipated that general construction labor would be available from the local and regional labor pool and would not result in substantial population growth because the construction workers would commute from their homes. Additionally, each construction phase (e.g. grading, paving, electrical etc.) requires different skills and specialties, which would be needed for the length of time of that phase. Because of that, the

Project's construction phases would not result in a long-term increase in employment and would not induce substantial unplanned population growth from short-term construction activities. Therefore, the Project would not directly or indirectly induce substantial unplanned population growth in the City during construction.

Operation

The 539.9-acre Project site has an existing Rural Mountainous (RM) land use designation under the County General Plan and Pass Plan, which permits one single family residence with a minimum lot size of 10 acres. Although the Project site is located in the City's SOI and outside of the City's jurisdiction, the City has established a designation for the Project site in its General Plan. The City's existing SOI Rural Residential 1 land use designation would allow up to 383 dwelling units, which would generate a maximum population of approximately 1,203 residents (383 dwelling units x 3.14 persons per household = ~1,203 persons) (City of Beaumont, 2020a). As such, the City's General Plan anticipated that the development of the Project site based on current planning documents would result in modest population growth.

The Project Applicant would not develop the Project site with the existing General Plan land use designation. The proposed Industrial and General Commercial land uses are evaluated below to determine whether the Project's proposed employment growth or planned infrastructure has the potential to directly or indirectly induce substantial unplanned population growth. The Project's direct and indirect impacts are discussed below.

Direct Impacts

Implementation of the Project could result in a substantial unplanned level of population growth if estimated increase in businesses would exceed local or regional population growth projections and result in a substantial job-housing imbalance.

In 2020, the City had a population of approximately 51,475 residents and according to SCAG, growth in the City is projected to continue in the future. By 2045, the City is anticipated to have a population of 80,200 residents according to SCAG's Connect SoCal and 131,949 by 2040 based on City's estimates. Because the Project's ultimate tenant mix is currently unknown, it is speculative at this time to estimate what percentage of employees generated by the Project would originate from the City or relocate to the City, and, thus, it is not possible to quantify any specific changes to the City's population or number of households that would result from development of the Project. It is nevertheless anticipated that the employees would come from within the City or the surrounding region because there is an imbalance of jobs and housing in Western Riverside County and the jobs that an industrial and commercial project in the region is likely to provide would be consistent with the job skills of residents in the area. For example, according to SCAG's Pre-Certified Local Housing Data, Beaumont has 19,385 workers living within its borders who work across 13 major industrial sectors. The most prevalent industry is Education & Social Services with 5,714 employees (29.5% of total) and the second most prevalent industry is Retail trade with 2,593 employees (13.4% of total). Additionally, the Construction industry has 1,071 employees (0.06% of total) and the Manufacturing industry has 1,483 employees (0.08% of total) (SCAG, 2021b). The Project's employment generation would not

induce substantial growth in the area because the Project would result in service-oriented and industrial-oriented jobs, which are jobs that are anticipated to be filled by existing and planned for future residents of the City and surrounding area.

According to the Bureau of Labor Statistics (BLS), in August 2021, the Riverside-San Bernardino-Ontario region's civilian labor force exceeded 2,090,800 persons with more than 1,931,500 people employed and an unemployment rate of 7.6% (or 159,300 persons) (BLS, 2021). Accordingly, the Riverside-San Bernardino-Ontario region contains an ample supply of potential employees under existing conditions and the Project's labor demand is not expected to draw a substantial number of new, unplanned residents to the area. Furthermore, approximately 91.1% of Beaumont residents commute outside of the City for work and more housing units are expected to be built within the City over the next 20 years. The Project would provide job opportunities close to home for existing and planned for future Beaumont residents, which would subsequently help achieve a better job-to-housing balance within the City, as analyzed below.

At full-Project build out, the Project is estimated to generate approximately 5,456 permanent jobs.[3] SCAG forecasted 15,900 jobs in the City by the year 2045; the Project's proposed jobs would represent approximately 34% of SCAG's forecast.

However, the City's December 2020 Updated General Plan contains newer projections than SCAG used. The Updated General Plan forecasted that the City would provide 21,497 jobs within the City limits (exceeding SCAG forecasts) and 16,727 jobs within the SOI, totaling 38,224 jobs within the City and its SOI by 2040 (City of Beaumont, 2020b). The City General Plan forecasted 22,774 more jobs as compared to SCAG's job forecast for the City. As such, the Project's proposed 5,456 total jobs were anticipated by the City's General Plan and represent approximately 33% of the anticipated jobs within the City's SOI and approximately 14% of the City's total job pool. Therefore, the Project's employment is within both SCAG and City growth forecasts.

As shown in DEIR Table 4.14-4, *Estimated Population and Housing Growth in Beaumont with Project*, the City has jobs-housing ratio of 0.61 (existing) and 0.93 (buildout year), which is still below the recommended jobs-housing ratio range of 1.0. The Project would contribute new employment to a housing-rich area contributing to an improved jobs-housing ratio of 0.92 for the City under existing plus Project conditions and 0.93 at Project buildout. Therefore, the Project would have a beneficial impact on the City's jobs-housing ratio and contribute to the City goal of reaching the recommended jobs-housing ratio of approximately 1.0.

In summary, the Project would be within the anticipated business growth projections of the City and would contribute to a more balanced job-housing ratio. Therefore, the Project would not result in substantial unplanned population growth. Impacts would be less than significant.

[3] Based on standard employment factors in the City's General Plan. Specifically, 1,000 s.f./employee for 4,500,000 s.f. Industrial Warehouse, 750 s.f./employee for 500,000 s.f. General Light Industrial, and 1,163 s.f./employee for 336,000 s.f. of Commercial.

Indirect Impacts

Implementation of the Project could result in a substantial and unplanned level of growth if it would result in the extension of new roads or other infrastructure that could induce population growth. The Project would require construction of roadways and utility infrastructure to serve the development.

The Project would construct four main roadways for on-site circulation—4th Street, Jack Rabbit Trail, Entertainment Avenue, and Industrial Way. The main roadway that would provide access to the Project site is 4th Street, which would be constructed from Jack Rabbit Trail at the easterly edge of the Project site to provide a looped road system around the entire site. Since all proposed roadways would be constructed on site and for the exclusive purpose of serving the proposed development, the Project would not create major new infrastructure that could result in substantial, unplanned growth.

Water, reclaimed water, and sewer infrastructure is currently under construction to the center line of 4th Street 350 feet east of the eastern boundary of the Project site. As shown in DEIR Figures 3-9, 3-10, and 3-11, the proposed potable water, reclaimed water, and sewer system would connect to infrastructure lines from the Hidden Canyon Industrial Park project located immediately to the east to the Project to provide service to the Project site. The Project site is located at the end of a cul-de-sac and is surrounded by existing development to the east, the SR-60 to the north, and MSHCP conservation land to the west and to the south/southwest of the site, with rural mountainous lands directly to the south/southeast. Therefore, infrastructure would not extend beyond the Project site and induce population growth. Since all proposed utility infrastructure would connect to lines at the eastern edge of the Project site and would exclusively serve the proposed development, this Project infrastructure would not indirectly induce substantial unplanned population growth.

Summary

The Project is not expected to be a catalyst for any substantial, unplanned population increases. Based on the foregoing analysis, neither the Project nor any Project-related component would directly or indirectly result in substantial unplanned population growth that would cause a significant impact to the environment. Impacts would be less than significant.

The jobs generated by the Project are expected to be filled by the existing labor force in the City and the larger Inland Empire area from the east via SR-60 and I-10. Project generated jobs are within the SCAG's and City's growth projections and the Project would improve the job-housing balance in the City. Accordingly, the Project would not induce substantial unplanned population growth and impacts would be less than significant. (DEIR, p. 4.14-7 to 4.14-10)

3.13.2 THRESHOLD B

Impact Statement: The Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

- **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.14.5 of the DEIR. The City finds that the development of the proposed Project would not result in significant impacts related to Threshold b; therefore, no mitigation is required.

- **Substantial Evidence**

Under existing conditions, the Project site is uninhabited, disturbed, and vacant. The Project site does not contain any existing structures, including residential structures. Therefore, implementation of the Project would not displace a substantial number of existing people or housing. As such, the implementation of the Project would not necessitate construction of replacement housing elsewhere. No impacts would occur. (DEIR, p. 4.14-10)

3.13.3 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to population and housing.

- **Findings**

Potential cumulative impacts of the Project related to population and housing are discussed in detail in Section 4.14.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to population and housing; therefore, no mitigation is required.

- **Substantial Evidence**

The Project's employment generation would not induce substantial growth in the area because the Project would result in service-oriented industrial-oriented jobs, which are jobs that are anticipated to be filled by residents of the City and the surrounding area who live in the area due to the presence and planned construction of more affordable housing units. The Project is not anticipated to attract new residents to move to the City or the immediate surrounding area to become employees. The Project most likely would supply employment opportunities to people already residing in the area.

With the related projects (see DEIR Section 4.0, for the related projects list), there would be an increase of 13,317 residential units, 6,318,000 square feet of industrial uses, and 60,899 square feet of commercial uses. The related projects' industrial and commercial uses would generate approximately 6,370 jobs, which when combined with the Project, result in 11,826 jobs. As shown in DEIR Table 4.14-5, Cumulative Projects Population, Housing, and Employment Growth Trends in Beaumont, the projected population, housing units, and employment growth generated by the Project and related projects would be within the anticipated growth for the City. Additionally, by adding housing and non-residential uses in the City, the Project, along with related projects, would increase the City's jobs-housing ratio from 0.66 (Buildout Year Without Project) to 0.75 (Buildout Year With Project Plus Related Projects), which is within the City's projected job-housing ratio of 0.93 in 2040. The increase in housing and jobs from the related projects and jobs generated by the Project would contribute to the

City's projected growth and improved jobs-housing ratio. Therefore, the Project with related projects would improve the City's jobs-housing balance and impacts would be less than significant.

The Project plus related projects totals are based on the more recent projections from the City's General Plan. These figures exceed SCAG's growth projections for the City in 2045, but as determined by the City's updated numbers, the cumulative growth would improve the City's projected jobs-housing ratio from 0.63 to 0.75 at Project buildout with related projects and the goal of 1.0 jobs-housing ratio in 2040. Because the jobs generated by the Project are anticipated in the City's projections and would improve the City's and SCAG's projected jobs-housing ratio, Project cumulative impacts would be less than significant.

Population growth in the City and surrounding areas resulting from the employment opportunities offered at the Project site are not expected. The City and surrounding area have an ample supply of housing (with additional housing development expected in the City into the future) to accommodate population growth that is anticipated to occur whether or not the Project proceeds. Therefore, the Project would not induce substantial population growth. The creation of employment opportunities would benefit the City and the larger Inland Empire region by helping to achieve a better jobs-to-housing balance. The Project does not propose construction of new homes or dwelling units that would directly introduce new residents to the area. As such, the Project's contribution to unplanned housing and population growth would not be cumulatively considerable.

Under existing conditions, the Project site is undeveloped and vacant. There are no existing people or housing located on site. As such, the Project has no potential to contribute to a cumulatively significant impact associated with the need to construct unplanned housing units. (DEIR, pp. 4.14-11 to 4.14-12)

3.14 PUBLIC SERVICES

Project impacts for CEQA Public Services Threshold a does not result in significant impacts and findings are discussed below.

3.14.1 THRESHOLD A

Impact Statement: The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire Protection; Police Protection; Schools; Parks; or Other Public Facilities.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.15.5 of the DEIR, Technical Appendix D, *Fire Protection Plan*, of the FEIR, and Supplemental CEQA Memorandum. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

- **Substantial Evidence**

The Project would allow for the development on the Project site of a maximum of 246,000 square feet (sf) of general commercial uses in addition to a 125-room hotel (90,000 sf) and a maximum of 4,995,000 sf of industrial uses. The Project would provide 124.7 acres of open space to accommodate landscaped manufactured slopes, fuel modification areas, and natural open space as a buffer to adjacent conservation area and 152.4 acres of open space – conservation. The Project does not include construction of new fire station, police, school, public park or recreation or other public facilities, which are not required to serve the Project.

The Project does not propose the construction of new homes or dwelling units that would directly introduce new residents to the area which could increase demand on public services. Additionally, the Project's employment generation would not induce substantial residential population growth in the area because: 1) it is anticipated in the business growth projections of the City, 2) it would contribute to a more balanced job-housing ratio, and 3) the Project would result in service-oriented and industrial-oriented jobs, which are anticipated to attract employees from City and surrounding area. The Project would supply employment opportunities to people already residing in the area.

Fire Protection Services

The Project site is currently located in the jurisdiction of the County of Riverside, and as it is in the unincorporated portion of the County, is in a State Responsibility Area and serviced by the RCFD. The Project site is designated within a "High" and "Very High" Fire Hazard Severity Zone within a state responsibility area (SRA) by the Riverside County General Plan and CalFire. CalFire has released an updated version of their fire hazard severity zone maps that, if adopted, would revise the fire hazard designation of the Project and its surroundings to all Very High rather than the current combination of Very High and High. (CalFire, 2023). With implementation of the Project, the Project site would be annexed into the City which contracts with RCFD for fire protection services. Development of the Project is expected to create the typical range of fire and emergency service calls, and would increase call volumes, which impacts response times for emergency and non-emergency services. The RCFD would continue to provide fire protection services to the Project. After being annexed into the City of Beaumont, it is possible that Project could be re-designated as Local Responsibility Area (LRA) in a future update of CalFire's hazard severity zone maps, which would mean the City of Beaumont would have the primary responsibility for the prevention and suppression of wildland fires at the Project site.

Following annexation, the Project site would continue to be primarily served by the Riverside County Fire Station (Station No. 66), an existing station located approximately 3.6 roadway miles east of the Project site and secondarily served by Station 20, located approximately 5 roadway miles east of the Project site (Google Earth, 2021). Station 66 is considered to have a low sensitivity workload, and Station 20 is considered to have moderate sensitivity with the capacity for more workload. Additionally, in September 2022, the City kicked off the construction of new Fire Station No. 106 (the "West Side Fire Station") along Potrero Boulevard across from Olivewood Avenue. Construction is expected to take approximately twelve months. The new fire station will be approximately 10,000 sq. ft. and will include living quarters, offices, a fitness center and large bays to house multiple fire

apparatus. Staffing will include three-four personnel, including a paramedic to provide advanced life support care. Services from the facility will be provided 24 hours a day, 7 days a week and 365 days of the year. Personnel at this station will be equipped with cardiac monitors, advanced life support medications, intubation equipment, trauma life support equipment, auto extrication tools, and more. The apparatus which will be housed in the facility will be capable of suppressing structure, wildland, vehicle, and other types of fires. The new station will decrease response times for the City's west side communities, including Olivewood, Tournament Hills, Tukwet and the new logistics centers located off of SR-60; and will provide a response time of 3.54 minutes to the Project.

Development of the Project would impact fire services by placing an additional demand on existing RCFD resources and personnel but would not increase the level of personnel or resources beyond that currently provided by these stations.

The Project is estimated to generate approximately 5,456 permanent jobs at Project buildout. The number on site at any given time may likely be half the estimated employee population, due to employee shift work, estimated transient population and operating hours of individual businesses. Based on this information, the total maximum estimated total population (which includes employees and transient use) of the Project site at any given time, is projected to be 2,728 persons.

The Project development is estimated to increase call volume up to 191 calls per year (4 calls per week or 16 calls per month). In 2017, Fire Stations 66 and 20 had a combined emergency responses of 4,943 calls per year (1,982 and 2,961 respectively), or 5.43 and 8.11 calls per day per station, respectively. The level of service demand for the Project raises overall call volume but is not anticipated to impact the existing fire stations to a point that they cannot meet the demand. For perspective, five calls per day are typical in an urban or suburban area. A busy fire station company would be one with 10 to 15 or more calls per day. Upon buildout of the Project site, Fire Station 66 could respond to an additional 4 calls per week, although the number will likely be lower than that based on the conservative nature of the population and calls per capita data used in this estimate. Additionally, with the operational status of new Fire Station 106, call volumes are anticipated to be reduced for the two existing stations and Station 106 should be approximately 5 to 7 calls per day (Dudek, 2023).

Therefore, considering the existing firefighting resources available in the City, implementation of the Project is not expected to result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impact. Additionally, Project development would occur in an area of the City already served by RCFD; therefore, the Project would not result in an expansion of RCFD's service area. In the event of an emergency within the Project site that requires more resources than the primary fire stations that serve the area could provide, RCFD would direct resources to the site from other RCFD stations nearby.

A number of California regulations, including Public Resources Code Sections 4290-4299 and California Government Code (CGC) Section 51178, also would apply to the Project and would address fire safety. In particular, these regulations require minimum state-wide fire safety standards pertaining to: roads for fire equipment access; signage for identifying streets, roads, and buildings; minimum private water supply reserves for emergency fire use; and, fire fuel breaks. In addition, they set fire

safety standards for all buildings and structures in, or adjoining, mountainous areas, or forest-, brush- or grass-covered lands or any land covered with flammable material to protect property from wildland fires. Furthermore, in order to offset the increased demand for fire protection services, the Project would be conditioned by the City to provide fire safety and support fire suppression activities, including compliance with State and local fire codes, fire sprinklers, a fire hydrant system, and paved access.

Implementation of the Project would result in an increase in calls for service; however, RCFD has indicated that this increase would not adversely impact RCFD's existing resources or impose a requirement for additional facilities over and above current facilities. Moreover, as is required of all projects in the City, the Project would be required to pay a development impact fee (DIF) to the City to assist in providing for future fire protection facilities, including fire stations. Payment of the DIF fee would ensure that funds are available for capital improvements, such as land/equipment purchases and fire station construction when they are needed.

The Project is also required to comply with Beaumont Municipal Code Chapter 3.36, which requires payment of a development mitigation fee prior to issuance of building permits to assist in providing revenue that the City can use to improve the Emergency Preparedness Center to offset the incremental increase in the demand for public services that would be created by the Project. Because the Project does not include construction of new fire station facilities and does not generate a need for additional facilities and the Project Applicant will pay fees that will provide its fair share of future fire and EMS needs established by the City. Project-related impacts to fire protection services are evaluated to be less than significant.

Police Protection Services

The Project is currently located in the jurisdiction of the County of Riverside and is served by the Riverside County Sheriff's Department. With implementation of the Project, the Project site would be annexed into the City and would be served by the Beaumont Police Department (BPD). Buildout of the Project would increase demands for police protection services in the Project area. During the construction and operation of the Project, the need for police services is expected to grow due to the increase in employment and associated potential for additional crime and accidents. Crime and safety issues during Project construction may include theft of building materials and construction equipment, malicious mischief, graffiti, and vandalism. After construction, the Project is anticipated to generate a typical range of police service calls as similar developments, such as vehicle burglaries, disturbances, and driving under the influence.

The increase in demands on police services resulting from the implementation of the Project would not adversely impact BPD's existing resources. There are currently no staffing or equipment deficiencies in the service area. The increase in potential services needed would not require the construction of a new police station or improvements to the existing station that serves the Project site. Implementation of the Project would result in an increase in calls for service; however, BPD has indicated that this increase would not adversely impact BPD's existing resources. BPS is currently expanding into an additional off-site facility to accommodate growth and develop a downtown bike patrol program.

Additionally, BPD has indicated that as the City population continues to grow, BPD is anticipating an 8% increase in sworn personnel and 12% increase in support staffing.

Moreover, as is required of all projects in the City, the Project would be required to pay DIF fees to the City to assist in providing for future police protection facilities, including police stations. Because the Project does not include construction of new police facilities and does not generate a need for additional facilities, and the Project Applicant will pay Police Facilities Development fees that will provide its fair share of future police needs established by the City, increases in demands for police protection resulting from implementation of the Project would not have significant impacts on BPD services.

School Services

There is adequate capacity under current conditions for all school levels for the 2021/2022 school year. Moreover, as is required of all projects in the City, the Project would be required to pay development impact fees to BUSD. These fees are collected by school districts at the time of issuance of building permits for commercial, industrial, and residential projects. BUSD would be able to collect these school impact fees pursuant to SB 50. The State Legislature has declared that the payment of those fees constitutes full mitigation for the impacts generated by new development, per Government Code Section 65995. Because the Project does not include construction of new school facilities and does not generate a need for additional facilities and the Project applicant will pay fees that are deemed by State legislation to provide the equivalent of mitigation, the Project would not have an impact on school services.

Parks

The Project would not directly or indirectly induce population growth. Employees and visitors who visit the Project site would have access to several recreational amenities on site. Due to the availability of active and passive recreational amenities and entertainment proposed on site, the potential for employees and visitors to travel to existing City parks during breaks or before and after business operations is low. Employees and visitors who may occasionally use the City's neighborhood parks, regional parks, or other recreational facilities, would not cause a substantial deterioration of park facilities. The Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered parks or recreational facilities or the need for new or physically altered parks or recreational facilities.

Other Public Facilities

As previously stated, development of the Project would not result in an increase in the population of the Project area. Therefore, the Project would not increase the demand for other public facilities, including library services which would require the construction of new or expanded public facilities. The Beaumont Library is owned and operated by the Beaumont Library District (BLD), not the City, and is funded by property taxes, contributions from individuals, and foundations. Development under the Project would result in the conversion of vacant land to commercial and industrial development, which in turn will increase property tax revenue to the BLD. As such, implementation of the Project

would not adversely affect other public facilities or require the construction of new or modified public facilities and no impact would occur. (DEIR, pp. 4.15-11 to 4.15-15)

3.14.2 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to public services.

- ❑ **Findings**

Potential cumulative impacts of the Project related to public services are discussed in detail in Section 4.15.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to public services; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

This cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development within the City and its Sphere of Influence, listed in DEIR Table 4.0-1, *Cumulative Development Land Use Summary*.

Fire Protection Services

Residential and employment population increases and associated increases in the demand for public services have been taken into account in long-range planning efforts on behalf of the City and the agencies providing public services to the area.

As with the Project, related projects within the City and the surrounding area would also be required pay DIF fees to their respective cities to assist in providing for fire protection facilities, including fire stations. Increased property and sales tax from future new developments would provide additional funding for any capital improvements necessary to maintain adequate fire protection facilities, equipment, and/or personnel. By maintaining a consistent level of service through expansion of facility improvements, RCFD would be able to ensure that its performance objectives are consistently met. In addition, compliance with the existing regulations would maintain adequate access within the Project site, which further ensures an adequate level of service for fire protection and emergency services to visitors and workers in the Project site. Furthermore, individual development projects pursuant to the City' General Plan would be reviewed by the City and RCFD and would be required to comply with all applicable building code and other code requirements in effect at the time building permits are issued. Therefore, the Project's increased demand for fire protection services, in conjunction with the increased demand for cumulative development pursuant to the City's General Plan, would not result in significant cumulative impacts.

Police Protection Services

Local population growth would result in an increased demand for public services and facilities, including law enforcement. Service providers would continue to evaluate levels of service and potential funding sources to meet demand. The City performs long-range planning for the provisions of public services and facilities based on its growth projections, which are revised over time and includes areas

within the City's sphere of influence. Through assessments of the City's capital improvement needs and annual budget review process, police department needs are assessed, and budget allocations are revised accordingly to ensure that adequate levels of police services, including police protection facilities, equipment, and/or personnel, are maintained throughout the City.

As with the Project, related projects within the City would also be required to pay DIF fees to the City to assist in providing for police protection facilities, including police stations. Increased property and sales tax from future new developments would provide funding for any capital improvements necessary to maintain adequate police protection facilities, equipment, and/or personnel to accommodate future growth. By maintaining a consistent level of service through expansion or facility improvements on parcels assumed for development in the City's General Plan, BPD would be able to ensure that its performance objectives are consistently met. Furthermore, individual development projects pursuant to the City's General Plan would be reviewed by the City and would be required to comply with the requirements in effect at the time building permits are issued.

Therefore, the demand for police services would not be adversely affected by the Project in conjunction with cumulative development pursuant to the City's General Plan. No significant cumulative impacts related to police services are anticipated.

School Services

Cumulative development in the BUSD service area, including the related projects, may generate a substantial increase in student population in BUSD schools. Assuming BUSD's enrollment increases, administrators will need to seek short-term and long-term remedies to accommodate those added students. In recognition of these conditions, the State Legislature provided authority for school districts to assess impact fees for both residential and nonresidential development projects. Those fees, as authorized under Education Code Section 17620(a) and Government Code Section 65995(b), are collected by municipalities at the time building permits are issued and conveyed to the affected school district in accordance with a defined fee structure, and the payment of these fees constitutes full mitigation for the impacts generated by new development, per Government Code Section 65995.

Since the Project would have no impact on school services and cumulative development must pay appropriate impact fees, no cumulative impact would occur as a result of the implementation of the Project in conjunction with other area-wide development activities. Cumulative project impacts would be less than significant.

Other Public Facilities

Cumulative population growth within the service area as a result of the related projects will likely increase the demand for library services. Funding for library services is from property taxes, contributions from individuals, and foundations. Therefore, as new developments within the service area of BLD occur, property tax revenues would increase in rough proportion, consequently increasing revenue to the BLD for library services.

The Project does not include any residential land uses and, therefore, is not expected to result in any additional significant demand for libraries. As concluded in the City's General Plan DEIR,

development and redevelopment in the City will result in increased tax revenue to BLD and impacts to library facilities are considered less than significant. Therefore, cumulative project impacts would be less than significant. (DEIR, pp. 4.15-15 to 4.15-17)

3.15 RECREATION

Project impacts for CEQA Recreation Thresholds a and b do not result in significant impacts and findings are discussed below.

3.15.1 THRESHOLD A

Impact Statement: The Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.16.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

The Project proposes a mixture of General Commercial, Industrial, and Open Space and Open Space-Conservation uses. The Project would not directly or indirectly induce population growth. As indicated in the City's General Plan, the City identifies residential development as land uses that will contribute to population growth and not industrial and commercial uses. Additionally, the dedication of parkland or the in-lieu payment of fees only applies to residential development and industrial and commercial developments are not viewed as generators of park activity. Therefore, it is not anticipated that the Project would result in an increased demand for recreational facilities. As such, the Project would not result in an increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. However, the Project would introduce development on vacant and undeveloped land, which would generate 5,456 permanent employees and visitors to the Project area.

Employees and visitors who visit the Project site would have access to several recreational amenities on site. The 30.2 acres of General Commercial land uses include a combination of hospitality, restaurant, and recreation commercial uses. The "Activities Park" within the General Commercial land uses would consist of landscaping, seating, video screen walls, and programming for wellness activities such as yoga, movies on the lawn, "biergarten" games, and a large climbing wall. In addition, to encourage social interaction, the Industrial and General Commercial building sites within Project site may include outdoor employee break areas with tables affixed to the ground to provide employees with a location to eat, gather, and enjoy being outside. Shading of these areas would be achieved through a combination of shade trees, umbrellas, or man-made shade structures. Other recreational amenities within the Industrial areas may include, but are not limited to, pedestrian walkways, pocket parks, seating areas, overhead structures, and open space areas.

Due to the availability of active and passive recreational amenities and entertainment proposed on site, the potential for employees and visitors to travel to existing City parks during breaks or before and after business operations is low. Employees and visitors who may occasionally use the City's neighborhood parks, regional parks, or other recreational facilities, would not cause a substantial deterioration of park facilities. Impacts would be less than significant. (DEIR, p. 4.16-6)

3.15.2 THRESHOLD B

Impact Statement: The Project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

❑ Findings

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.16.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold b; therefore, no mitigation is required.

❑ Substantial Evidence

On-Site

The Project would result in the development of General Commercial, Industrial, and Open Space and Open Space-Conservation uses. Approximately 152.4 acres (PA 10) is designated as Open Space - Conservation in order to preserve habitats to be dedicated to the Western Riverside County Regional Conservation Authority (RCA) for inclusion in the Multiple Species Habitat Conservation Plan (MSHCP) Reserve. Approximately 124.7 acres in PA 9 are designated as Open Space to accommodate landscaped manufactured slopes, fuel modification areas, project signage, sewer lift station, optional water tank, and natural open space as a buffer for the Open Space - Conservation area in PA 10.

The Project would provide active and passive recreational opportunities for its future employees and visitors through climbing walls, pedestrian walkways, pocket parks, seating areas, overhead structures, and open space areas. The construction of these recreational facilities would occur within the boundaries of the Project site and would be part of the Project's construction phase. The Project's construction impacts are analyzed throughout the DEIR and mitigation is incorporated where necessary. As concluded in the DEIR, the Project's construction activities would be less than significant. Additionally, future open space and recreational facility development in the Project site would be required to adhere to the development standards and design guidelines of the Project. Therefore, impacts associated with the Project's on-site recreational facilities would be less than significant.

Off-Site

As stated above, the City currently has a park ratio of 6.52 acres of parkland per 1,000 residents (343.4 acres of parkland in total), exceeding the goal of 5 acres of parkland per 1,000 residents. Implementation of the Project would not introduce new residents into the City; therefore, the City's

park ratio would remain unchanged with the Project. Implementation of the Project would include adequate recreation and open space facilities and would not cause the deterioration of existing facilities.

Because the City is currently meeting its park ratio requirement and the Project would not increase the residential population in the City, there is no need for the construction or expansion of recreational facilities within the City. Therefore, Project impacts would be less than significant. (DEIR, p. 4.16-7)

3.15.3 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to recreation.

❑ Findings

Potential cumulative impacts of the Project related to recreation are discussed in detail in Section 4.16.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to recreation; therefore, no mitigation is required.

❑ Substantial Evidence

Cumulative impacts consider development of the Project in conjunction with other development projects and planned development within the City and its Sphere of Influence.

The Project does not propose any residential uses or other land use that would result in an increase in population, thereby increasing the use of existing neighborhood and regional parks or other recreational facilities. Although there may be a nominal increase in the use of local recreation facilities, Project employees and visitors who do not already reside in the area are not anticipated to utilize local recreational facilities to the extent that physical deterioration would occur or be accelerated, even when considered in the context of cumulative developments in the area. New residential development is required to dedicate parkland or pay in-lieu fees in accordance with Beaumont Municipal Code Section 16.66.020 pursuant to the Quimby Act. In-lieu Parkland fees that are utilized by the City are required to be used for the development and acquisition of park facilities. Moreover, in compliance with the City's Municipal Code Chapter 3.34, residential projects would pay the City's Regional Park, Multipurpose Trail and Open Space and Open Space Facility Fee, which would ensure that improvements to the City's regional parks, multipurpose trail and open space facilities would occur. Further, the Project would provide active and passive recreational facilities on site, further reducing the frequency of future employees and visitors using the City's existing off-site parks. Other cumulative developments in the local area that involve residential uses would be required to comply with the City's Municipal Code, Chapter 3.34 and Section 16.66 to accommodate the City's anticipated population growth. As such, the Project's contribution to such effects would be de minimis and would be less than significant on both a direct and cumulative basis.

The City currently meets its target park ratio of 5 acres of parkland per 1,000 residents. As shown in DEIR Table 4.14-5, *Cumulative Projects Population, Housing, and Employment Growth Trends in Beaumont*, the City's General Plan projects a population of 131,949 by 2040. As concluded in the

City's General Plan Draft Environmental Impact Report (DEIR), based on the projected population of 131,949, which results in an increase of approximately 82,699 persons, a total of 415 new acres of parkland would be required. With the existing 343.4 acres of parkland and approximately 10,252 acres of open space projected in the City's General Plan, the adoption of the Revised Zoning Ordinance making parks a permitted use in all of City's residential zoning districts. and compliance with Chapter 3.34 of the Beaumont Municipal Code and applicable Beaumont 2040 Plan goals, policies, and implementation measures, impacts regarding maintaining acceptable service ratios and performance standards for park and recreation facilities would be less than significant (City of Beaumont, 2020b, pp. 5.15-18). Therefore, the construction or expansion of recreational facilities would not be required and cumulative impacts would be less than significant. (DEIR, pp. 4.16-7 to 4.16-8)

3.16 TRANSPORTATION

Project impacts for CEQA Transportation Thresholds a, c, and d do not result in significant impacts and findings are discussed below.

3.16.1 REGULATORY REQUIREMENTS

The following Regulatory Requirements (RRs) are applicable regardless of CEQA and would apply to any project under similar circumstances and, therefore, do not constitute mitigation measures. However, they will nonetheless be included in the Project's Mitigation Monitoring and Reporting Program to ensure the implementation of the mandated RRs.

RR 17-1 Prior to issuance of any building permits, the Project Applicant shall make required per-unit fee payments associated with the Western Riverside County Transportation Uniform Mitigation Fees (TUMF) and the City of Beaumont Development Impact Fee (DIF).

RR 17-2 Prior to the issuance of grading or building permits, the Project Applicant shall prepare and the City of Beaumont shall approve, a temporary traffic control plan for construction. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices. A requirement to comply with the temporary traffic control plan shall be noted on all grading and building plans and also shall be specified in bid documents issued to prospective construction contractors.

3.16.2 THRESHOLD A

Impact Statement: The Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

- ❑ **Findings**

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.17.7 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

- **Substantial Evidence**

SCAG's 2020-2045 RTP/SCS

The fundamental goals of SCAG's 2020-2045 RTP/SCS are to make the SCAG region a better place to live, work, and play for all residents regardless of race, ethnicity, or income class. DEIR Section 4.11, *Land Use and Planning*, Table 4.11-2, shows Project consistency with the following goals related to transportation.

- Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.
- Goal 4: Increase person and goods movement and travel choices within the transportation system.
- Goal 7: Adapt to changing climate and support an integrated regional development pattern and transportation network.
- Goal 8: Leverage new transportation technologies and data driven solutions that result in more efficient travel.

The City of Beaumont is identified as one of the priority growth areas for job centers in the region under the Connect SoCal Plan. Job Centers have been identified in all six counties in the SCAG region and represent areas that have a significantly higher employment density than surrounding areas. Employment growth and residential growth are prioritized in existing Job Centers in order to leverage existing density and infrastructure. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced. The Project is located within the City of Beaumont and proposes a variety of land uses (commercial and industrial) for the region. Implementation of the Project would be consistent with the goals and policies of SCAG's regional transportation planning program and would not conflict with SCAG's ability to implement the regional strategies outlined in the 2020-2045 RTP/SCS. Therefore, impacts would be less than significant.

City of Beaumont General Plan Mobility Element

DEIR Table 4.17-1, General Plan Applicability Analysis, provides an analysis of the Project's consistency with applicable General Plan policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. In addition, payment of TUMF and DIF fees and fair share improvements would ensure that traffic congestion and acceptable peak hours operations at intersections affected by the Project would remain acceptable and consistent with applicable General Plan policies. As shown, The Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and impacts would be less than significant. (DEIR, pp. 4.17-10 to 4.17-14)

Although impacts would be less than significant, Mitigation Measure MM 4.17-2 was added to the Project at the request of Planning Commission to ensure trucks would travel on designated routes (see Supplemental CEQA Memorandum).

MM 4.17-2 Prior to the issuance of occupancy permits for the first buildings in Planning Areas 4-8 (i.e., industrial/warehouse buildings), the Project Applicant shall prepare and submit a Truck Traffic Demand Management Plan to the Planning Department for approval in order to prohibit Project trucks from driving on Oak Valley Parkway or on Potrero Boulevard north of the Potrero/SR-60 Interchange. The Truck Traffic Demand Management Plan shall include, but is not limited to the following:

- Lease provisions clearly identifying the required truck routes;
- CC&R restrictions with financial penalties for violations and City ability to enforce as third-party beneficiary;
- Truck route maps provided to all drivers and posted in breakrooms and throughout the Project;
- Designation of a Traffic Coordinator contact for the City to notify in the event of traffic issues;
- Annual reports to the City's Planning Department.

3.16.3 THRESHOLD C

Impact Statement: The Project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

❑ Findings

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.17.7 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold c; therefore, no mitigation is required.

❑ Substantial Evidence

Project Access

Driveways and access point locations, as shown in the Specific Plan, are conceptual until approved by the City Engineer and shall conform to the City's standard intersection and access spacing, based upon the street's classification. Additionally, specific design criteria have been established to address the needs of pick-up, delivery, and service vehicles related to Industrial uses, as follows:

- Design interior driveways and drive aisles to provide adequate stacking and prevent queuing of vehicles on public streets.

- Locate and design service entrances so they do not interfere with owner/tenant/customer access.

- Design loading areas to provide for tractor trailer backing and maneuvering on-site and not from a public street.

- Provide appropriate on-site service vehicle parking/turnouts in an efficient, non-obtrusive location appropriate to the scale and needs of the development.

- Vehicle loading/unloading when parked, shall not impede normal traffic flow.

Proposed roadway improvements along the Project site frontage would occur within the public rights-of-way and would be installed in conformance with the City's design standards. Access to the Project's proposed industrial and commercial uses would be separated to allow for safe access for visitors to the Project's commercial uses. Jack Rabbit Trail provides access to PAs 1 and 2; however, Jack Rabbit Trail will not provide non-emergency access to the SR-60 Freeway but will provide gated emergency access only to SR-60. Primary access to the Industrial PAs 3 through 8 is provided via 4th Street along the south, with Industrial Way providing secondary access along the north. The City reviewed the Project's application materials and determined that no hazardous transportation design features would be introduced by the Project. Accordingly, the proposed Project would not create or substantially increase safety hazards due to a design feature or incompatible use. Impacts would be less than significant.

Freeway Off-Ramp Queuing

A project would result in a significant impact, if it would substantially increase hazards due to a geometric design feature or incompatible use, and CEQA does not include freeway off-ramp queuing within these categories. However, for informational purposes only, a queuing analysis was performed for the off-ramps at the I-10 Freeway at Oak Valley Parkway and Beaumont Avenue interchanges to assess whether vehicle queues for the off ramps may potentially result in deficient peak hour operations at the ramp-to-arterial intersections and may potentially "spill back" onto the I-10 Freeway mainline.

There are no movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows with the addition of Project (Phase 1), Project (Phase 2), and Project Buildout traffic.

There are no movements that are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows under Opening Year Cumulative (2023), Opening Year (2025), and Opening Year (2027), Without Project and With Project traffic conditions.

The following movements are anticipated to experience queuing issues during the weekday AM or weekday PM peak 95th percentile traffic flows under Horizon Year (2045) Without Project and With Project traffic conditions:

- I-10 Eastbound Ramps & Oak Valley Parkway (#7), Southbound shared left-through-right turn lane – AM and PM peak hours; and

- I-10 Westbound Ramps & Oak Valley Parkway (#8), Northbound shared left-through-right turn lane – PM peak hour only

Although queue lengths could increase in the Horizon Year, such queuing is consistent with general freeway conditions throughout the region and would not substantially increase hazards due to geometric design features or incompatible uses. Additionally, queuing issues at these locations would occur in 2045 without the Project. Therefore, the Project would not create or substantially increase safety hazards due to a design feature or incompatible use and impacts would be less than significant.

3.16.4 THRESHOLD D

Impact Statement: The Project would not result in inadequate emergency access.

❑ Findings

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.17.7 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold d; therefore, no mitigation is required.

❑ Substantial Evidence

The Specific Plan includes a detailed Circulation Plan to ensure efficient access to and within the Project site. Jack Rabbit Trail forms the Project site's eastern boundary and connects to Industrial Way at the northeast corner and with 4th Street at the southeast corner of the Project site. Local access to the Project site would be provided from the future extension of 4th Street from Jack Rabbit Trail to Potrero Boulevard currently under construction as part of the Hidden Canyon Industrial Park project located immediately to the east to the Project. 4th Street between Jack Rabbit Trail and Potrero Boulevard is being constructed across the Hidden Canyon Industrial Park site as an industrial collector with a 78-foot right-of-way and 56-feet curb-to-curb. Upon construction of the Project, access from the Project site to the SR-60 via Jack Rabbit Trail would be restricted, with the northerly portion of Jack Rabbit Trail to the SR-60/Jack Rabbit Trail interchange utilized as secondary emergency egress (and fire and emergency vehicle ingress) only. Jack Rabbit Trail provides access to PAs 1 and 2, however, Jack Rabbit Trail will provide gated emergency access only to SR-60. Specifically, the Project will install emergency access gates on Jack Rabbit Trail just south of the CalTrans right-of-way upon construction of alternative temporary access to Hoy Ranch from 4th Street and installation of a temporary connection from 4th Street to Jack Rabbit Trail south of the development area of the Property. The emergency access gates shall be installed prior to the issuance of the first Certificate of Occupancy in Phase 1. Primary access to the Industrial PAs 3 through 8 is provided by 4th Street along the south, with Industrial Way providing secondary access along the north. Industrial Way connects with 4th Street at the south side of PA 8, assuring a loop road for both firefighting and evacuation. Entertainment Way also provides access to PAs 3 and 4 along their western edges. Entertainment Way demarcates the change in land use between the Industrial uses in PAs 3 through 8, and "The Experience at Beaumont Pointe" commercial areas in PAs 1 and 2, while connecting Jack Rabbit Trail and 4th Street.

To provide emergency secondary access to each phase of development, 40-foot wide Interim Fire Access Loop Connections will be constructed between PAs 4 and 5 for Phase 1 (PA 1, 2, 3 and 4), between PAs 6 and 7 for Phase 2 (PAs 5 and 6), and a permanent Fire Lane Loop (Industrial Way) will be constructed around the perimeter of PA 8 as part of Phase 3. Interim Fire Access Loop Connections will be eliminated by being incorporated into the parking areas for the PA in which each is located upon installation of either: additional Interim Fire Access Loop Connections or completion of the Industrial Way connection to 4th Street.

The City evaluated the Project's design, including but not limited to proposed driveway locations and parking lot/drive aisle configuration, to ensure that adequate access would be provided for emergency vehicles at all phases of Project development. The Project would provide adequate emergency access along abutting roadways during temporary construction activities within the public right-of-way.

In addition, the Project would comply with fire safety requirements and standards of the Riverside County Fire Department, including fire prevention and suppression measures relating to water improvement plans, fire hydrants, automatic fire extinguishing systems, fire access, access gates, combustible construction, water availability, and fire sprinkler systems. This would ensure that the Project is designed and constructed to provide adequate emergency access for emergency vehicles. Therefore, the Project would not result in inadequate emergency access and impacts would be less than significant. (DEIR, pp. 4.17-19 to 4.17-20)

3.16.5 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to transportation (conflict with a program, plan, ordinance or policy addressing the circulation system; increase hazards; inadequate emergency access).

- ❑ **Findings**

Potential cumulative transportation impacts of the Project related to conflicts with a program, plan, ordinance or policy addressing the circulation system; increase in hazards; and inadequate emergency access are discussed in detail in Section 4.17.8 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to these topics; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

This cumulative impact analysis considers development of the proposed Project in conjunction with other development projects and planned development.

The analysis under Threshold a indicates that the Project would not conflict with relevant SCAG RTP/SCS or City General Plan programs, plans, and policies addressing the circulation system. Further, the Project does not include any features that would preclude the City from completing and complying with these guiding documents and policy objectives. Each related project would be expected

to comply with all applicable relevant programs, plans, and policies. Therefore, no cumulative impact would occur.

Based on the review of the Project Site driveways and the informational queuing analysis outlined above, under Threshold c, no safety concerns relating to geometric design of the Project Site access points would occur. Therefore, impacts are not considered to be cumulatively considerable and no significant cumulative impact would occur.

As discussed under Threshold d above, the Project would not result in inadequate emergency access. Therefore, the Project would not cumulatively contribute to inadequate emergency access, and no cumulative impact would occur. (DEIR, pp. 4.17-20 to 4.17-21)

3.17 UTILITIES AND SERVICE SYSTEMS

Project impacts for CEQA Utilities and Service Systems Thresholds a through e do not result in significant impacts and findings are discussed below.

3.17.1 THRESHOLD A

Impact Statement: The Project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.19.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

Water Facilities

Water service to the Project site would be provided by BCVWD. Water demand associated with the Project would consist of interior plumbing devices (i.e., sinks, toilets, faucets), outdoor landscape irrigation, and various industrial and commercial process systems.

The Project is anticipated to increase water demand in the Project site by 196.7 acre-feet per year (AFY; 175,584 gpd) of which 85.2 AFY is outdoor, non-potable use (BCVWD, 2021). Based on the Project-specific WSA prepared for the Project, BCVWD forecasts that it will have sufficient water supplies to meet estimated water demands from Project buildout. Water supply is discussed in detail under Threshold b, below.

The Project site is within BCVWD's 2650 Pressure Zone (PZ). The development of the Project would require construction of new water distribution lines within the Project site's development footprint.

The final design and sizing of on-site facilities would accommodate the anticipated water demand (landscaping, potable, and fire flow) based on the proposed land use. These new water distribution lines would connect to existing facilities that are located within the Project area and within adjacent roadways.

The proposed system includes the following facilities: on-site dual potable water lines to create a connection between the 2650 Pressure Zone and 2750 Pressure Zone within the Specific Plan, along with an optional 1.2 MG tank which allows for 960,000 gallons (usable storage). The Project proposes to extend the dual 16-inch potable water lines from the Hidden Canyon development located 350 feet east of the Project site in 4th Street in the existing right of way to create a hydraulic loop around the development area. The northern potable water line in the northern side of 4th Street, Entertainment Way, and Industrial Way is the primary potable water supply to the Project site from the 5-MG Hannon Tank (2650 PZ). The southern potable water line in the southern side of 4th Street is an emergency potable water supply from the future 2750-2650 Pressure-Reducing Valve Station (PRV Station) located along 4th Street. The dual potable water lines in 4th Street connect to the existing dual lines and off-site check valve located within 4th Street at Project's eastern boundary. The two potable water lines along with an off-site check valve allow for back-feeding (flushing) of the 2650 PZ from the 2750-2650 PRV Station, provide redundant daily and emergency service from the 2750 PZ, reduce the potential for stagnant water quality issues, and allow for a future 2650 PZ tank south of CA-60 Freeway to back-feed the 2650 PZ.

Additionally, the Project would construct an on-site recycled water system supplied by BCVWD. Recycled water will be used for construction dewatering, irrigation of manufactured and replanted slopes within PA 9, as well as for irrigation of parkway landscaping and irrigation of landscaping within the General Commercial and Industrial land uses (PAs 1-8). The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street, 350 feet east of the Project site in the existing right of way. Additionally, a proposed 8-inch water line would branch off from the 14-inch main line within 4th Street and extend between PAs 7 and 8 to provide irrigation water to the portion of PA 9 on the north side of the Project site.

Wastewater and Wastewater Treatment Facilities

The Project is anticipated to have a wastewater generation rate of 0.26 million gallons of wastewater per day. The Project would construct a wastewater conveyance system to service the Project site and connect to the City's sanitary system. The Project proposes to utilize 8" gravity sewer main lines, located within Industrial Way, to move wastewater flows from the Project's high points (at PA 8 and PA 1), to the lift station constructed at the low point between PA 5 and PA 6. Flows from the lift station would then be conveyed in dual 6" force main lines located within Industrial Way, Entertainment Way, Jack Rabbit Trail, and 4th Street, to the point of connection at the existing 12" gravity main line at the manhole located at the eastern boundary of the Project site. The on-site lift station will be designed to the Project's ultimate capacity with no interim condition except potential pump quantity.

Beyond the point of connection, the existing 12-inch gravity line continues to the east within 4th Street, downstream approximately 2,500 feet, where it would connect to the existing Hidden Canyon lift station (also known as the Beaumont Crossroads Lift Station). From there, the existing 6" and 16" force mains within 4th Street continue conveyance.

Although there is some capacity remaining that can be utilized for the Project, buildout of the Project will require improvements at the Hidden Canyon Lift Station. Such improvements will consist of installing a new larger below ground precast wet well sized for the full buildout flows of the service area, upsizing the pumps to handle the increased flows and associated electrical and mechanical improvements. The construction of the new onsite sewer lift station and the improvements to the existing Beaumont Crossroads Lift Station shall be completed prior to the issuance of any Certificate of Occupancy for any of the project buildings.

The precise alignments and sizing of sewer facilities will be determined at the Plot Plan, Conditional Use Permit, and/or final map stages of Specific Plan implementation. As shown on Figure 3-11, *Conceptual Sewer Plan*, the Project provides the following sewer improvements:

- Proposed 8-inch Dual Sewer Force Main within Industrial Way through Entertainment Way to Jack Rabbit Trail to the point of connection at 4th Street.

- Connection to the proposed 12-inch gravity sewer main within 4th Street, 350 feet east of the Project site.

- Proposed 8-inch gravity sewer lines within Industrial Way.

- Lift Station in PA 5.

- Point of connection at 4th Street east of Jack Rabbit Trail.

The Project's proposed wastewater facilities, including the on-site sewer lift station, would be sized only to accommodate the wastewater generated by the Project. No new or expanded off-site sewer lines are anticipated to serve the Project.

The 0.26 mgd of wastewater generated by the Project would be treated at the Beaumont Wastewater Treatment Plant No. 1, which currently has the upgraded capacity to treat 6.0 mgd of effluent. The Project's anticipated wastewater generation represents approximately 4% of the treatment capacity for the Beaumont Wastewater Treatment Plant No. 1. The Beaumont Wastewater Treatment Plant No. 1 has sufficient capacity to treat wastewater generated by the Project in addition to existing commitments. The Beaumont Wastewater Treatment Plant No. 1 is anticipated to adequately treat flows generated over the next 20 years. No new or expanded wastewater treatment facilities not already planned would be required. Impacts would be less than significant.

Stormwater Drainage Facilities

The Project would increase the amount of impervious surface within the Project site, and the Project would construct an on-site storm drain system. The Project's proposed storm drain system would consist of catch basins, grated inlets, storm drainpipes with sizing varying from 18-inches to 48-inches, and four detention basins, each of which provides stormwater treatment and peak flow mitigation for each of the respective tributaries. On-site and some off-site flows would be conveyed within the proposed streets to a series of catch basin and stormwater lines which direct flows to the four on-site detention basins. Detention basins are planned within PAs 4, 5, 6, and 8. The Project's flood protection facilities would be designed in accordance with the requirements of the Riverside County Flood Control and Water Conservation District (RCFCWCD) with adequate access easements and facilities provided.

The Project's proposed stormwater drainage system is designed to accommodate anticipated stormwater flows to accept 100-year, 1-hour storm events from the Project site underdeveloped conditions. The Project's stormwater will flow to the existing culverts, drain to San Timeteo Creek Reach 3, then into the Santa Ana River, and ultimately discharge into the Pacific Ocean. No new or expanded off-site storm drain facilities are required to accommodate runoff from the Project site beyond that proposed as part of the Project.

Dry Utilities (Electrical Power, Natural Gas, and Telecommunications)

Construction of the Project would require connections to existing electricity, natural gas, and telecommunication facilities 350 feet east of the Project site in 4th Street in the existing right-of-way. The Project would be served in accordance with the State of California's Public Utilities Commission (CPUC) and Federal Energy Regulatory Commission tariffs. As discussed in DEIR Section 4.6, *Energy*, Project operations will result in the total annual demand of 53,857,582 kBTU of natural gas and 25,747,206 kWh of electricity. Twenty percent of the Project's electricity demand will be met by rooftop solar as indicated in DEIR Table 4.8-6. By comparison, approximately 23 billion BTU of natural gas is consumed in California annually based on the California daily petroleum consumption estimate of approximately 64.1 billion BTU per day. Similarly, approximately 3,717,674 GWh of electricity is consumed in California annually based on the California daily electricity consumption estimate of approximately 10,185 GWh per day. Therefore, the Project's natural gas and electricity consumption would be 0.0002% and conservatively would be 0.0007% of the State's consumption in 2020, respectively. According to the County of Riverside Climate Action Plan, in 2017 the County consumed 89,469,089 therms of natural gas and 2.9 billion kWh of electricity. Therefore, the Project's natural gas and electricity consumption would be 28.78% and 0.89% of the County's consumption in 2017, respectively, and no new or expanded off-site dry utilities are required to serve the Project.

Environmental Impacts from Utility and Infrastructure Systems

Domestic and recycled water infrastructure, sewer lines, lift station, storm drain infrastructure, and dry utilities would be installed in compliance with the requirements of the respective utility providers, and consistent with final plans approved by the utility providers. Construction activities associated with the proposed utility infrastructure would be within the Project's construction impact area and within

the 4th Street right of way 350 feet east of the Project site as shown in Figure 3-7, in Section 3.0, *Project Description*, of the DEIR. The installation of the proposed infrastructure improvements would result in physical environmental impacts; however, these impacts have been included in the analyses of construction-related effects presented throughout the DEIR, (e.g., air quality impacts, impacts to biological and cultural resources, water quality impacts, and noise and vibration impacts, etc.). Any applicable Project-specific mitigation measures for construction identified for each topical issue would address potential significant impacts associated with construction and installation of utilities. Therefore, through consistent implementation of a variety of measures related to construction impacts, no additional impacts related to construction and operation of utility systems would occur. Impacts would be less than significant. (DEIR, pp. 4.19-19 to 4.19-22)

3.17.2 THRESHOLD B

Impact Statement: The Project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

- ❑ **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.19.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold b; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

The Project site will be annexed into the service area for the BCVWD and the BCVWD is the operator of the public water system that would provide potable water service to the Project site. Due to the total building area (over 500,000 s.f. of floor space) permitted by the Beaumont Point Specific Plan, the Project's water demand is required to be evaluated in a WSA, in accordance with Section 10912 of the California Water Code. A WSA and Amendment #1 WSA was prepared by Charles Marr Consulting and Pacific Advanced Civil Engineering, Inc. (CMC & PACE) for BCVWD to determine whether the Project's water demand was adequately accounted for in the 2015 and 2020 BCVWD UWMPs and if the Project's water demand could have a significant impact on projected water supplies and resources. The results of the WSA are summarized below.

According to the Project-specific WSA, the City's General Plan anticipated that the Project site would be developed with land use with a density of 2,000 equivalent dwelling units (EDUs) and have a water demand of 1,092 AFY, which was included in BCVWD's 2015 UWMP. The 2015 BCVWD UWMP concluded that BCVWD had adequate existing and planned water supplies to serve the Project site, existing commitments, and future commitments. The Project's new proposed land uses for the Project site estimates a new density equivalent to 360 EDUs, representing a site density reduction of 82%, and an estimated water demand of 197 AFY of which, 85.2 AFY (approximately 43%) would be used for outdoor, non-potable irrigation purposes.

In September 2021, four months after approval of the WSA, the BCVWD Board of Directors approved the 2020 UWMP, updating BCVWD's 2015 UWMP to be in compliance with State law. Specific to

the Project, the 2020 UWMP incorporates the specific change in land use from residential to commercial, reducing the total water demand for the Project from 2,000 EDUs to 360.26 EDUs, a reduction of 82%. Additionally, the 2020 UMWP further defines BCVWD's and City's commitment to using non-potable water, available from the City's upgraded Title 22 recycled water treatment plant and shallow aquifer wells, which are not suitable for direct potable water supply. This is consistent with the approved WSA, which indicated 43.31% of the total demand could be supplied by BCVWD's non-potable water system. This further reduces Project's imported and local groundwater (potable) demand, from 360.26 EDUs to 204.21 EDUs. Therefore, the Project's water demand is accounted for in the 2020 UWMP (BCVWD, 2021).

Water Code Section 10910 (c)(3) states that if the projected water demand associated with the proposed project was accounted for in the most recently adopted UWMP, the public water system may incorporate information from that plan in preparing the WSA. The BCVWD 2020 UWMP includes the Project water demands and indicates that the District can meet its service area's water supply requirements under normal, single, and multiple consecutive dry years. Therefore, the WSA concludes that BCVWD has sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years through 2045 and impacts would be less than significant.

Additionally, the Riverside County Fire Department (RCFD) has a fire flow requirement of 4,000 gallons per minute (gpm) for 4 hours for the Project. As identified in the WSA, the backbone transmission system in the main pressure zones consists primarily of 24-inch pipes with some 30-inch pipeline leading to some reservoirs. The bulk of the backbone transmission and distribution pipe is ductile iron with cement mortar lining, installed in the last 10 to 15 years. Small, older distribution lines in the system are gradually being replaced over time with minimum 8-inch ductile iron pipe. The WSA concluded that the system can provide over 4,000 gpm fire flow; therefore, impacts would be less than significant. (DEIR, pp. 4.19-22 to 4.19-23)

3.17.3 THRESHOLD C

Impact Statement: The Project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- ❑ **Findings**

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.19.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold c; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

As previously discussed, the City controls and manages its sewer collection, conveyance, and treatment system. Wastewater generated in the City is treated at the Beaumont Wastewater Treatment Plant No. 1, which currently has a treatment capacity of 4.0 mgd with an average daily flow of 3.1 mgd. As such,

the Beaumont Wastewater Treatment Plant No. 1 has an excess capacity of 0.9 mgd. As discussed under Threshold a of this section, the Project is estimated to generate 0.26 mgd of wastewater requiring treatment. Therefore, the Beaumont Wastewater Treatment Plant No. 1 has sufficient excess capacity to treat Project-generated wastewater. In November 2020, the City completed its upgrading and expanding of the Beaumont Wastewater Treatment Plant No. 1 capacity, which increases the treatment capacity from 4.0 mgd to 6.0 mgd. The upgrades and expansion to the Beaumont Wastewater Treatment Plant No. 1 is anticipated to adequately handle anticipated flows over the next 20 years. Therefore, the City has adequate capacity to serve the Project's projected demand in addition to the existing commitments and impacts would be less than significant. (DEIR, p. 4.19-23 to 4.19-24)

3.17.4 THRESHOLD D

Impact Statement: The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

❑ Findings

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.19.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold d; therefore, no mitigation is required.

❑ Substantial Evidence

Construction Impacts

During the Project's construction phases, various types of construction-related waste, primarily consisting of discarded materials and packaging. Based on the anticipated building square footage of 5,331,000 s.f.[4] and the US EPA's construction waste generation factor of 4.34 pounds (lbs.) per s.f. of non-residential uses, approximately 11,568[5] tons of waste would be generated during the building construction phase (EPA, 2009, p. 10). The Project's building construction is reasonably expected to occur over a period of approximately 53 months, or 1,586 days (see Table 3-4), which corresponds to approximately 7.3 tons[6] of construction waste generated per day during the building construction phase. Additional waste would be expected from infrastructure installation and other Project-related construction activities.

The California Green Building Standards (CalGreen) Code, which has been adopted by the City's Municipal Code (Chapter 15.22, Green Building Standards Code), requires that at least 65% of construction debris be diverted from landfills through recycling, reuse, and/or salvage. Non-recyclable demolition debris and construction waste generated by the Project would be disposed at the Lamb Canyon Landfill, which has a permitted tonnage of 5,000 tpd, plus 500 tpd for beneficial reuse, and has 19,242,950 cy of capacity remaining as of January 2015. Therefore, it is anticipated that the Project

[4] 246,000 s.f. (General Commercial) + 4,995,000 s.f. (Industrial) + 90,000 s.f. (125-room hotel) = 5,331,000 s.f.
[5] (5,331,000 s.f. x 4.34. lbs/s.f.) x (1 ton/2,000lbs) = ~11,568 tons
[6] 11,568 tons/1,586 days = ~7.3 tons/day

would require 2.6 tons[7] of solid waste to be disposed of at a landfill per day, which represents approximately 0.05%[8] of the permitted capacity at the Lamb Canyon Landfill. The remaining 4.7 tons of solid waste would be recycled, reused, and/or salvaged pursuant to CalGreen and the City's Municipal Code Chapter 15.22. As such, the disposal of construction-related solid waste associated with the Project is not anticipated to exceed the permitted capacity of the Lamb Canyon Landfill and impacts would be less than significant.

Operational Impacts

Based on a daily waste generation factor of 10.8 tons of solid waste annually per 1,000 square feet of industrial building area, identified in the City's General Plan EIR, long-term operation of the Project's industrial buildings would generate approximately 53,946 tons of solid waste per year. Additionally, based on a daily waste generation factor of 2.4 tons of solid waste annually per 1,000 square feet of commercial building area, identified in the City's General Plan, long-term operation of the Project's commercial buildings would generate approximately 806 tons[9] of solid waste per year. The Project is estimated to generate a total of 54,752 tons of solid waste per year or approximately 150 tons of solid waste per day, which represents approximately 3% of the Lamb Canyon Landfill maximum daily capacity and 3.1% of the Badlands Landfill maximum daily capacity. Additionally, the Project would be required to comply Assembly Bill 341, which requires all commercial businesses that generate 4 cubic yards or more of waste per week to have a recycling program in place. The goal is to divert 75% of California's waste stream towards recycling and away from the landfill. Waste Management, Inc. has programs in place to support commercial customer's compliance with AB 241.

As previously discussed, the City is within the service area of the Lamb Canyon Landfill and a majority of the waste generated by the City is taken to the Lamb Canyon Landfill. However, waste generated within the City is also taken to other Riverside County landfills, as well as various landfills throughout the State. Disposal of the municipal waste generated within the City is ultimately the responsibility of Riverside County, and as such, the County directs municipal wastes to any available disposal sites. This could be accomplished through direct transport to an alternative landfill, or through the construction and operation of a transfer facility. Waste generated under buildout conditions will be directed to landfills with available capacity, as determined by the County. As part of its long-range planning and management activities, the RCDWR ensures that Riverside County has a minimum of 15 years of capacity, at any time, for future landfill disposal. The 15-year projection of disposal capacity is prepared each year by as part of the annual reporting requirements for the Countywide Integrated Waste Management Plan (City of Beaumont, 2020b, pp. 5.18-36). As previously discussed, Riverside County's active landfills currently have adequate capacity to serve the Project. Therefore, the implementation of the Project is not anticipated to exceed the capacities of existing landfill facilities and impacts would be less than significant. (DEIR, pp. 4.19-24 to 4.19-25)

[7] 7.3 tons x 0.35 = ~ 2.6 tons
[8] (2.6 tons/5,000 tons) x 100 = 0.05%
[9] (2.4 tons/1000) x 336,000 s.f. (246,000 s.f. [General Commercial] + 90,000 s.f. [125-room hotel]) = 806.4 tons

3.17.5 THRESHOLD E

Impact Statement: The Project would comply with federal, State, and local management and reduction statutes and regulations related to solid waste.

- **Findings**

Potential impacts of the Project related to Threshold e are discussed in detail in Section 4.19.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold e; therefore, no mitigation is required.

- **Substantial Evidence**

Federal, State, and local statutes and regulations regarding solid waste generation, transport, and disposal are intended to decrease solid waste generation through mandatory reductions in solid waste quantities (e.g., through recycling and composting of green waste) and the safe and efficient transport of solid waste. The Project would be required to coordinate with Waste Management, Inc. to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including AB 341, Mandatory Commercial Recycling, and the California Solid Waste Reuse and Recycling Act of 1991.

Additionally, the Project would be required to comply with applicable practices enacted by the City under the California Integrated Waste Management Act of 1989 and Solid Waste Disposal Measurement Act of 2008. State law requires that local jurisdictions divert at least 50% of all solid waste generated by January 1, 2000. The diversion goal has been increased to 75% by 2020 by SB 341. Further, the Solid Waste Disposal Measurement Act of 2008 was established to make the process of goal measurement (as established by California Integrated Waste Management Act of 1989) simpler, timelier, and more accurate. The Solid Waste Disposal Measurement Act of 2008 builds on California Integrated Waste Management Act of 1989 compliance requirements by implementing a simplified measure of jurisdictions' performance. The Solid Waste Disposal Measurement Act of 2008 accomplishes this by changing to a disposal-based indicator—the per capita disposal rate—which uses only two factors: (1) a jurisdiction's population (or in some cases employment); and (2) its disposal, as reported by disposal facilities. In 2019 (the last year data was approved), the City implemented 41 programs to reduce solid waste generation and achieve the increased solid waste diversion required. These programs involve composting, facility recovery, household hazardous waste, policy incentives, public education, recycling, source reduction, special waste materials, and transformation (biomass) (CalRecycle, 2019a). Building operators would be required to participate in the City's recycling programs and comply with hazardous waste disposal regulations. The City had an average disposal rate of 4.8 pounds per resident per day and 33.2 pounds per employee per day in 2019. These disposal rates are less than the established disposal rate targets for the City (9.7 pounds per resident per day and 42.1 pounds per employee per day) (CalRecycle, 2019b). Therefore, resident- and employee-generated solid waste being diverted to landfills is less than anticipated for the City, and the City is in compliance with solid waste management regulations. The Project would be required to coordinate with Waste Management, Inc., the waste hauler, to develop collection of recyclable material for the Project on a common schedule as set forth in applicable local, regional, and state programs. Recyclable materials

that could be recycled by the Project include paper products, glass, aluminum, and plastic. Future tenants of the Project would comply with the solid waste management regulations by mandatory participation in the City's recycling programs and with hazardous waste disposal regulations.

Hazardous waste generated during construction would be disposed of per existing legal requirements. Similarly, hazardous materials used during the construction and operation of the warehouse uses, including maintenance activities, would be disposed of in compliance with applicable regulations. Further, as discussed above, solid waste generated during construction activities would adhere to the diversion requirements outlined in the CalGreen Code and would exceed the required 65% diversion rate. The Project would participate in established programs for commercial development projects to reduce solid waste generation, in accordance with the provisions of the Riverside Countywide Integrated Waste Management Plan.

As such, the Project would not conflict with any federal, State, or local regulations related to solid waste management. Therefore, no impacts related to compliance with solid waste statutes would occur, and no mitigation is required. (DEIR, pp. 4.19-25 to 4.19-27)

3.17.6 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to utilities and service systems.

❑ Findings

Potential cumulative impacts of the Project related to utilities and service systems are discussed in detail in Section 4.19.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to utilities and service systems; therefore, no mitigation is required.

❑ Substantial Evidence

This cumulative impact analysis considers development of the Project site in conjunction with other development projects and planned development within the service area for the respective utility that provides utilities for, or the service area for specific facilities (e.g., wastewater treatment facilities) that serve the Project.

As with the Project, each individual related development project would require the construction of necessary infrastructure (water and wastewater lines, storm drain facilities, dry utilities, and others) to serve the project. Each individual development project is subject to review for utility capacity to avoid unanticipated interruption of service or inadequate supplies. Coordination with the utility providers would allow for the provision of utility services to the Project and other developments. The Project and other planned projects are subject to connection and service fees to offset increased demand and assist in facility expansion and service (at the time of need). Therefore, the Project impacts would not contribute to a significant cumulative impact associated with construction of utility infrastructure or provision of utility services.

The Project involves a General Plan Amendment, Specific Plan, Pre-Zone, Vesting Tentative Parcel Map, and Development Agreement to develop the Project site with industrial, commercial, open space, and open space – conservation uses. The Project site was previously planned with a different proposed land use -- density of 2,000 EDUs with an estimated water demand of 1,092 AFY, which was included in BCVWD's UWMP. With the approval of the Project's proposed discretionary approvals, the Project would reduce the density of EDUs from 2,000 EDUs to 360 EDUs and reduce the estimated water demand from 1,092 AFY to 197 AFY, a substantial reduction. According to the Project-specific WSA, the BCVWD has sufficient potable water supplies to meet existing and future demands through the year 2040 under normal, single-dry, and multiple dry years. As such, the Project would not contribute to a cumulatively considerable impact on water supply.

The Beaumont Wastewater Treatment Plant No. 1 has an existing capacity of 6.0 mgd and is poised to meet current and future demands of the City. As such, there is adequate existing and proposed capacity to provide wastewater treatment for the Project and cumulative development. Therefore, the Project would not result in a significant cumulative impact on wastewater treatment facilities.

The City, including the Project site and cumulative development, is within the service area of the Lamb Canyon Landfill and a majority of the City's solid waste is disposed of at the Lamb Canyon Landfill. The remaining portions of the City's solid waste are disposed of at landfills with adequate capacity throughout Riverside County and surrounding counties within the State. The solid waste generated by construction and operation of the Project would represent nominal portions of daily disposal capacities at existing landfill facilities. The existing landfill facilities have sufficient daily capacity to handle solid waste during the Project's construction and operation and would not directly result in the need for expanded solid waste disposal facilities.

As part of its long-range planning and management activities, the RCDWR ensures that Riverside County has a minimum of 15 years of capacity, at any time, for future landfill disposal. The 15-year projection of disposal capacity is prepared each year as part of the annual reporting requirements for the Countywide Integrated Waste Management Plan. (City of Beaumont, 2020b, pp. 5.18-36) Further, the Project would adhere to applicable local and State regulations during both construction and long-term operation to reduce solid waste generation. Other cumulative development would be required to comply with such regulations. Therefore, the Project would not have a significant cumulative impact related to solid waste disposal and compliance with regulations addressing the reduction of solid waste generation and disposal. (DEIR, pp. 4.19-27 to 4.19-28)

3.18 WILDFIRE

Project impacts for CEQA Wildfire Thresholds a through d do not result in significant impacts and findings are discussed below.

3.18.1 THRESHOLD A

Impact Statement: The Project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.20.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold a; therefore, no mitigation is required.

❑ Substantial Evidence

As stated above, the Project site is located within a High and Very High Fire Hazard Severity Zone (VHFHSZ) and within a State responsibility area (SRA) as designated by the Riverside County General Plan and CalFire (see DEIR Figure 4.20-1a, *Fire Hazard Severity Zone*). Adjacent to the Project site, within the City's jurisdictional boundary, the land is primarily designated as a Very High Fire Hazard Severity Zone (VHFHSZ) and High Fire Hazard Severity Zone (HFHSZ) local responsibility area (LRA). Adoption of CALFire's new fire hazard zone maps would not change the findings in the Fire Protection Plan (*Technical Appendix M1*), which was planned and prepared for the Project as if it was entirely within the VHFHSZ. After being annexed to the City, it is possible that the Project site could be re-designated as LRA in a future update of CALFIRE's Hazard Severity Zone (RCIT, 2021; CalFire, 2021; Dudek, 2023).

The Project site does not currently contain any emergency facilities nor does it serve as an emergency evacuation route. During an emergency in the City, operations are coordinated from the City's Emergency Operations Center (EOC) in accordance with the City's Emergency Operations Plan (EOP). The primary EOC location is at the Chatigny Recreation Center (CRC) located on the northeast corner of Oak Valley Parkway and Cherry Avenue. The alternate EOC location is the Beaumont City Hall Facility located at 550 E 6th Street. Additionally, according to the City's General Plan Safety Element, the City has major evacuation routes which include I-10 and SR-60 as well as several major roadways. The following existing major roadways are emergency evacuation routes: Brookside Avenue, Oak Valley Parkway, Highland Spring Avenue, and Beaumont Avenue. It should be noted that an interchange at Potrero Boulevard and SR-60 is under construction and an extension of Potrero eastward to connect to Highland Springs Avenue is planned. Additionally, SR-60, immediately north of the Project site, serves as an evacuation route for the City. Following the completion of the extension, Potrero Boulevard will be designated as an evacuation route (City of Beaumont, 2020a).

Primary access to the Project site is currently provided by Jack Rabbit Trail with immediate access from/to SR-60, and this route will be restricted to providing emergency access only after the Project is constructed. The Project will build an internal "Jack Rabbit Trail" road which will connect to the existing Jack Rabbit Trail at the southern edge of the Caltrans right-of-way in its current location. The emergency-access-only gate will be located immediately south of the Caltrans right-of-way where the new Jack Rabbit Trail connects with the existing Jack Rabbit Trail. The gate is proposed to limit access to Jack Rabbit Trail for fire and emergency access only but will not represent an obstructed roadway as there will be various RCFD-approved remote and on-site methods for opening the gate in an emergency (e.g., for egress during an evacuation), including fitment with sensors, remote opening via cell technology, 3rd party monitoring and gate control (24/7 security company, or others as preferred by RCFD). 4th Street will be extended into the Project site and will serve as the primary access (78 feet wide) and designed to meet fire department access requirements including approved provisions

for fire apparatus turnaround. In addition, according to the Fire Protection Plan (DEIR, Attachment C) prepared for the Project, on-site construction will comply with the following requirements from the Road Circulation and Design Guidelines:

- All roads will comply with access road standards of not less than 24 feet, unobstructed width and capable of supporting an imposed load of at least 75,000 pounds.
- Interior circulation streets and parking lot roadways that are considered roadways for traffic flow through the Project site will meet fire department access requirements when serving the proposed structures.
- Typical, interior Project roads, including collector and local roads, will be constructed to minimum 24-foot, unobstructed widths and shall be improved with aggregate cement or asphalt paving materials.
- Private or public streets that provide fire apparatus access to buildings three stories or more in height shall be improved to 30 feet unobstructed width.
- Private and public streets for each phase shall meet all Project approved fire code requirements, paving, and fuel management prior to combustible materials being brought to the Project site.
- Vertical clearance of vegetation (lowest-hanging tree limbs), along roadways will be maintained at clearances of 13 feet, 6 inches to allow fire apparatus passage.
- Cul-de-sacs and fire apparatus turnarounds will meet requirements and RCFD Fire Prevention Standards.
- Any roads that have traffic lights shall have approved traffic pre-emption devices (Opticom) compatible with devices on the Fire Apparatus.
- Roadways and/or driveways will provide fire department access to within 150 feet of all portions of the exterior walls of the first floor of each structure.
- Roadway design features (e.g., speed bumps, humps, speed control dips, planters, and fountains) that could interfere with emergency apparatus response speeds and required unobstructed access road widths will not be installed or allowed to remain on roadways.
- Access roads shall be usable by fire apparatus to the approval of RCFD prior to lumber drop on site. Developer will provide information illustrating the new roads, in a format acceptable to the RCFD for updating of Fire Department response maps.

During Project construction, travel lanes to Jack Rabbit Trail and SR-60 would be maintained until alterative roadway access is constructed, and construction materials and equipment would be staged on site. The Project is not anticipated to result in a substantial alteration to the design or capacity of an

existing road that would impair or interfere with an adopted emergency response or evacuation plan. No impacts would occur.

Under operational conditions, the Project would be required, by Riverside County Ordinance No. 348, Section 21.32a, *Emergency Access*, to maintain adequate emergency access for emergency vehicles on site. The Project provides for two avenues of egress in the event of an emergency, with primary access provided at 4th Street and emergency access provided via the Jack Rabbit Trail interchange with SR-60. The Project does not include any features that would physically impair or otherwise conflict with an emergency response plan or evacuation plan. Additionally, as part of the City's discretionary review process, the City reviewed the Project's application materials to ensure that the design of the Project would meet City requirements, appropriate emergency ingress and egress would be available to-and-from the Project site and that the Project would not substantially impede emergency response times in the local area. Station 66 would respond within approximately 7 minutes to the Project's entrance, Station 20 would respond within approximately 9 minutes, and Station 106 would respond within approximately 3.54 minutes (Dudek, 2023, p. 37).

The Project's proposed industrial/commercial development is anticipated to increase the call volume at a rate of up to 191 calls per year (4 calls per week or 16 calls per month). Fire Stations 66 and 20 combined emergency responses in 2017 totaled 4,943 calls per year or 5.43 and 8.11 calls per day per station, respectively. The level of service demand for the Project would increase overall call volume; however, the increase is not anticipated to impact the existing fire stations to a point that they cannot meet the demand (Dudek, 2023). Furthermore, it should be noted that the Project would be required by City Chapter 3.36, *Emergency Preparedness Facilities Fees*, to contribute costs to improve Emergency Preparedness Centers.

The Project will maintain a conservative approach to fire safety, including maintaining the landscape and structural components according to the standards described above and embracing a "Ready, Set, Go!" stance on evacuation.

The time to evacuate under multiple scenarios was calculated via traffic simulations. DEIR Table 4.20-1, *Evacuation Time Summary*, displays the calculated evacuation roadway capacity and the time it would take to evacuate for the Project and surrounding land uses for 17 different scenarios. DEIR Figure 4.20-2, *Evacuation Routes*, displays the evacuation route as well as the location of the emergency exit gate.

During a Project evacuation, law enforcement would shut down traffic along SR-60 to prevent people from entering an active wildfire area, diverting traffic away from the evacuation area, as well as to keep it open to evacuees who may be in harm's way during mass evacuation scenarios. Evacuees from the Project would need to travel along both or one of the adjacent evacuation routes, SR-60 or West 4th Street, to reach more urban landscapes and the travel way is hardened (low fuel loading, converted landscapes, developed ignition resistant buildings and hardscape on both sides) and exposure during an evacuation would be limited. Currently, there is no population relying on the emergency egress points at Jack Rabbit Trail and SR-60 or 4th Street. However, future development (Hidden Canyon Industrial Park) would use these routes for evacuation during some wildfire scenarios. In the scenario

where Hidden Canyon evacuates simultaneously with the Project, evacuation of the Project site and Hidden Canyon is possible in all modeled scenarios; therefore, the Project would not substantially impair an emergency evacuation plan (CRA Mobility, 2022). Details of each scenario are found in the Project's evacuation analysis (DEIR *Technical Appendix M2*). According to the Project's evacuation analysis, the Project site can be safely evacuated under the worst-case scenarios:

1) When the Project site and Hidden Canyon are fully occupied (all parking spaces occupied) and need to be evacuated concurrently, within 3 hours and 36 minutes using SR-60 only, 3 hours and 32 minutes using 4th Street only, or 2 hours and 1 minute when using all evacuation routes are available (Scenarios 13-15).

2) When the Project site, Hidden Canyon Industrial Park, and Olive Wood are fully occupied (all parking spaces occupied) and need to be evacuated concurrently, within 2 hours 4 minutes when all evacuation routes are available (Scenario 17).

These scenarios will require additional emergency management pre-planning and "in the field" determinations of when evacuations are needed and how they are phased to maximize efficiency. However, the current evacuation time for the surrounding communities ranges from 27 minutes to 35 minutes (Scenarios 10 and 16), adding the maximum number of vehicles from the Project site increases the evacuation time between 16 minutes and 26 minutes.

In the event that the time to evacuate is considered too long to evacuate safely by police and fire personnel in the field at the time of the evacuation event, then Project site employees and visitors can be ordered not to evacuate and to shelter-in-place in the specific locations that were constructed to allow for safe sheltering in place. In accordance with the Fire Protection Plan, a shelter-in-place plan will be prepared and provided to all on-site personnel outlining the actions to take if a shelter-in-place notification is provided by emergency management sources. The project buildings will be constructed of concrete which is non- combustible and highly resistant to heat. Because of the concrete/ignition resistant construction, fuel modification zone setbacks and the type of lower fire intensity vegetative fuels in the vicinity of the site, sheltering in place is considered to be a safe option if a fast-moving wildfire precludes complete evacuation of the Project site. The City has adopted the Emergency Operations Plan and Standardized Emergency Management System (SEMS) / National Incident Management System (NIMS). This plan establishes the emergency organization, assigns tasks, specifies policies and general procedures, and provides for coordination of planning efforts of the various emergency staff and service elements. Emergency responders will utilize this plan to determine whether the Project's visitors and employees should shelter-in-place or evacuate under an emergency scenario.

Evacuations are fluid events and evacuation timeframes may vary widely, depending on a variety of factors including the number of vehicles evacuating, the road capacity to move those vehicles, employee or patrons' awareness and preparedness, evacuation messaging and direction, and on-site law enforcement control. Because there are no standards for determining whether an evacuation timeframe is appropriate, deferring to actual evacuation results and similar project analysis is a typical

approach. In the case of historical wildfire evacuations in Riverside County, there are several notable examples that indicate the extremely high success rate for evacuating large numbers of people and doing so in a managed and strategic way through the available technological innovations available to emergency managers. While large-scale evacuations may take several hours or more and require moving people long distances to designated areas, the success rate in Riverside County is nearly 100% safe evacuations. Comparing similar project analysis indicates that it is common to increase evacuation times when new communities are built and the increase in time can be 45 minutes or more based on lack of road capacity to absorb and facilitate movement of the additional vehicles. However, as indicated above, the Project can be safely evacuated under the worst-case scenarios and would not interfere or impede an emergency evacuation route.

Additionally, although the Project is not to be considered a shelter-in-place development, because the Project site would be highly ignition resistant in terms of its buildings and landscape/hardscape, it is anticipated that an additional option available to emergency managers in some wildfire and other emergency scenarios will be directing people to temporarily remain on site and seek refuge within the ignition resistant buildings or other safe areas on the site. When an evacuation is ordered, it will occur according to pre-established evacuation decision points or as soon as notice to evacuate is received, which may vary depending on many environmental and other factors.

Based on the foregoing analysis, the Project is not anticipated to interfere with or impede an adopted emergency response plan or emergency evacuation route during operation or construction. As such, impacts would be less than significant. (DEIR, pp. 4.20-7 to 4.20-14)

3.18.2 THRESHOLD B

Impact Statement: The Project would not, due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

- ❑ **Findings**

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.20.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold b; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

Currently, the Project site is undeveloped, disturbed, vacant and has hills in the south. The Project site's hills would remain undeveloped and would contain existing native and non-native vegetation that would be susceptible to wildfire.

Defensible space is defined as managed and maintained areas adjacent to structures that enable fire suppression activities through the removal of flammable fuels and maintenance of landscapes that would not readily transmit wildfire. Defensible space enables firefighters to safely position themselves at the development edge and begin tactical protection efforts. The Project would incorporate defensible

space in the form of modified fuel areas in two managed zones, a fuel maintenance zone and a fuel modification area (FMA).

A typical fuel modification zone (FMZ) is a strip of land where combustible vegetation is removed and/or modified and partially or totally replaced with more appropriately spaces, drought-tolerant, fire-resistant plants to provide a reasonable level of protection to structures from wildland fire. Although a FMZ is the typical method used to ensure that a Project would not exacerbate wildfire risks and would reduce wildfire-related impacts, other fuel management methods can be used to provide the functional equivalent to a traditional FMZ, such as a FMA or fuel maintenance zone. The fuel maintenance zone reduces the fuel load of a wildland area adjacent to the FMA.

In addition to a 100-foot FMA, the Project will provide a 20-foot-wide fuel maintenance zone. An FMA occurs around the perimeter of the Project's wildland exposures and a fuel maintenance zone is measured outward from the edge of the developed pad. The fuel maintenance zone will be irrigated and landscaped area to the pad edge, extending the protections provided by the FMA. For the Project, the FMA will be 100 feet wide starting from the edge of the developed pad and moving inward.

As a wildfire burns into the irrigated zone, fire behavior is affected, substantially reducing flame lengths, spread rates and intensity, thus causing wildfires to become spotty. FMZs or "brush management" was initially made part of the Public Resources Code 4290 and 4291 to protect natural resources from fires originating in neighboring developed areas and have since become focused on protecting communities and structures. However, FMZs, fuel maintenance zones and FMAs in the case of the Project, continue to have the same benefit of buffering preserved open space areas from accidental ignitions within communities. Positioning low plant density, creating an irrigated zone directly adjacent to the development pad, and implementing defensible space provides a significant buffer between structures and other landscape fire and native vegetation. These techniques aid in preventing ignitions in the built environment but also across the larger landscape. The same way that fuel modification will setback a wildland fire from structures, the fuel modification will setback a structure fire from the more burnable native plants. Embers can be generated by a structure fire and can be blown over the fuel modification into native fuels, but the inclusion of automatic sprinklers in every building combined with the presence of staffed fire stations with fast response times significantly reduces the potential for a structure fire to reach a size that would produce significant impacts. The highest likelihood of vegetation ignitions would be related to roadways. Further, as depicted in the fire behavior modeling for existing and post-Project conditions, the Project at buildout would reduce the overall risk of wildfire spreading off site with implementation of the fire safety requirements, defensible space, and vegetation management.

Should future iterations of the site plan result in buildings that do not achieve a minimum of 100 feet of defensible space, then alternative materials and methods may be proposed to provide the functional equivalency of a full 100 feet of defensible space. Alternative materials and methods will be to the satisfaction of the RCFD and may include structural hardening enhancements or landscape features, like non-combustible walls (Dudek, 2023).

Based on the conceptual site plan, the buildings have more than adequate on-site defensible space (FMAs and FMZs), which consists of asphalt roadway, parking stalls, loading zones, irrigated landscaping, and irrigated slope protection landscaping. A description of the Project's FMZs is provided below.

- **FMZ 1 – Planning Area 1 (Hospitality):** The single proposed hospitality building would be surrounded by paved parking lots, streets, driveways, irrigated landscaping a minimum of 200 feet wide, and adjacent buildings, the closest of which is about 80 feet away.
- **FMZ 2 – Planning Area 2 (Commercial):** There are seven proposed buildings in the commercial Planning Area with eleven different occupancies proposed in the conceptual plan. The east side of the buildings is bordered by a 75-foot-wide street and an approved development (grading underway) across the street. The west side of the buildings is adjacent to a large parking lot at least 500 feet wide. The north side of the buildings is adjacent to the hospitality building approximately 80 feet north.
- **FMZ 3 – Planning Area 3 through Planning Area 8 (Industrial):** In the conceptual plan, there are five industrial buildings each of which is set back from the edge of the developed pad between 195 feet and 405 feet; in between are asphalt roadways, parking stalls, loading zones, and irrigated landscaping. Along the entire southern perimeter of the developed pad and PAs 3 through 8 is the 78-foot-wide 4th Street fire apparatus access road. Provided below is a description of the five proposed buildings' setbacks.
    - **Building 1** has a 205-foot setback on the north side with adjacent irrigated slopes that have an average width of 25 feet and a 265-foot setback on the south with adjacent irrigated slopes that have an average width of 100 feet. The east and west exposures have adjacent buildings. Additionally, the Planning Area 4 Park is proposed south of proposed Building 1.
    - **Building 2** has a 205-foot setback on the north side with adjacent irrigated slopes that have an average width of 80 feet and a 265-foot setback on the south with adjacent irrigated slopes that have an average width of 125 feet. The east and west exposures have adjacent buildings.
    - **Building 3** has a 70-foot setback on the north side with adjacent irrigated slopes that have an average width of 125 feet and a 192-foot setback on the south with adjacent irrigated slopes that have an average width of 75-feet. The east and west exposures have adjacent buildings.
    - **Building 4** has a 205-foot setback on the northside with adjacent irrigated slopes with an average width of 25 feet and a 283-foot setback on the south with adjacent irrigated slopes that have an average width of 25 feet. The east and west exposures have adjacent buildings.
    - **Building 5** has a 205-foot setback on the north side with adjacent irrigated slopes that have an average width of 200 feet, a 283-foot setback on the south with adjacent irrigated slopes that have an average width of 100 feet, and a 235-foot setback on the

> west with adjacent irrigated slopes that have an average width of 100 feet. The east and west exposure has an adjacent building. The 20-foot fuel maintenance zone is achieved on all exposed sides of the building; however, there is a small portion of the building's northwest corner that is not able to achieve the full 100-foot FMA. Based on the structure's ignition resistance and the modeled flame lengths, the achievable FMA and fuel maintenance zone is sufficient (Dudek, 2023).

Vegetation management would be implemented as interim fuel management throughout the Project's construction phases for each structure as there may be a period of one or more years where developing phases are exposed on multiple sides to wildland fuels. The Project's proposed design features, which include asphalt roads and parking stalls, and a fully irrigated landscape, would provide a level of safety against wildfires equal to a 100-foot wide FMZ. The Project is considered to represent a low wildfire risk to its occupants based on its ability to provide for evacuations and contingency on-site shelter-in-place. The implementation of the on-site defensible space (FMAs and FMZs) would reduce the risk of wildfire at the Project site and would improve the ability of firefighters to fight fires on the properties and protect the site and neighboring resources, irrespective of the cause or location of ignition (Dudek, 2023).

Moreover, all structures would be protected by an automatic, internal fire sprinkler system. Fire sprinkler systems shall be in accordance with RCFD and National Fire Protection Association (NFPA) Standard 13. Fire sprinkler plans for each structure would be submitted and reviewed by RCFD for compliance with the applicable fire and life safety regulations, codes, and ordinances as well as the RCFD Fire Prevention Standards for fire protection systems. The internal waterlines are anticipated to supply sufficient fire flows and pressure to meet the demands required for the Project's interior fire sprinkler systems for all the Project's proposed structures (Dudek, 2023).

The ignition resistance and fire safety awareness of the Project and its population influences the likelihood of fire ignitions and the potential for fire to spread off site into adjacent wildland fuels and negatively impact existing communities. It is a relatively rare event when a wildfire occurs, and an even rarer event when a wildfire escapes initial containment efforts. Approximately 90 to 95% of wildfires are controlled below 10 acres. Studies (Keeley & Syphard 2018; Syphard et al. 2007; Syphard & Keeley 2015) show the ignition resistance and fire safety awareness of the Project and its population influences the123epreshood of fire ignitions and the potential for fire to spread off site into adjacent wildland fuels and negatively impact existing communities. As the research indicates, humans can drive wildfire ignition risk, but they can also reduce it. When fire protection is implemented at the parcel level and leverages ignition resistant building materials, infrastructure improvements, and landscape design the wildfire risk can be significantly reduced in the surrounding environment. When wildfire is planned for and safety measures are incorporated into the building design, such as with the Project, it can not only withstand wildfire, but prevent it. This prevention benefits the Project and the surrounding areas by reducing the landscape level fire risk. Further, given the Project's multi-scaled approach to fire protection, it is unlikely that the Project would be a significant source of ignitions and result in increased off-site impacts related to wildfire (Dudek, 2023).

The Project is not expected to significantly increase the already known fire risk associated with roads, and the Project- and road-adjacent fuel modification would aid in reducing the preexisting risk. Interior roadways are also not expected to result in significant vehicle ignitions. Jack Rabbit Trail will be restricted to serve as an emergency access road only, all but eliminating the fire risk associated with vehicle use on that road. The on-site roadways would comply with all fire department access requirements and be adjacent to fuel modification. Therefore, even if ignition were to occur on the Project interior roadways, it is highly unlikely it would spread beyond the Project site, and due to the level of hardscape and the adjacent fuel modification areas, would result in patchy and slow fire spread and reduced fire intensity.

On-going/as-needed fuel modification maintenance during the interim period while the Project is built out and adjacent parcels are developed, which may be one or more years, will include necessary measures for consistency with the FPP, including:

- Regular Maintenance of dedicated Open Space.
- Removal or thinning of undesirable combustible vegetation and replacement of dead or dying landscaping.
- Maintaining ground cover at a height not to exceed 18 inches. Annual grasses and weeds shall be maintained at a height not to exceed three inches.
- Removing accumulated plant litter and dead wood. Debris and trimmings produced by thinning and pruning should be removed from the Project site or chipped and evenly dispersed in the same area to a maximum depth of four-inches.
- Maintaining manual and automatic irrigation systems for operational integrity and programming. Effectiveness should be regularly evaluated to avoid over or under-watering.
- Complying with these FPP requirements on a year-round basis. Annual inspections are conducted following the natural drying of grasses and fine fuels, between the months of May and June, depending on precipitation during the winter and spring months.

Long-term protection of the development and the surrounding area is dependent on the maintenance of fuel modification as even fire-safe designs can degrade over time. To alleviate this, the Project will conduct regular assessments of the FMZs and FMAs. During this maintenance, dead and dying material and undesirable plants will be removed. Thinning will also be conducted as necessary to maintain plant spacing and fuel densities. This will keep the FMZs, FMAs and landscaped areas in a highly fire resistive condition free of accumulated flammable debris and plants.

The development of the Project site with the Project 124epred not facilitate the spread of wildfire and would reduce projected flame lengths to levels that would be manageable by firefighting resources for protecting the site's structures, especially given the ignition resistance of the structures and the planned ongoing maintenance of the entire site landscape (Dudek, 2023). In addition, the Project will comply with the measures established in the FPP with respect to construction and maintenance at the Project

site, including in FMZs and FMAs. As such, the Project is not anticipated to exacerbate wildlife risks, thereby exposing Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant. (DEIR, pp. 4.20-15 to 4.20-19)

3.18.3 THRESHOLD C

Impact Statement: The Project would not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment.

- ❑ **Findings**

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.20.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold c; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

The Project would implement on-site defensible space (FMAs and FMZs) to preclude wildfire impacts. These are designed to reduce rather than exacerbate fire risk. Analysis of the Project's construction impacts on other aspects of the environment is provided throughout the DEIR. As indicated in Threshold b, vegetation management during construction and operation within FMZs and FMAs will be performed by the Project owners, tenants and managers in accordance with the FPP to reduce risk of wildfire. Therefore, impacts associated with construction and maintenance of FMZs and FMAs would be less than significant.

The Project would result in the construction of on-site, internal roadways, and a portion of 4th Street and would improve Jack Rabbit Trail. The Project Applicant would construct 4th Street from its current terminus at the easterly edge of the Project site and would replace the existing Jack Rabbit Trail on the Project Site with alternative roadways providing access to the existing unmaintained Jack Rabbit Trail roadway to the south of the Project site and providing emergency egress to the Jack Rabbit Trail interchange at SR-60. As discussed under Threshold a above, the Project's paved roads would be constructed to meet City Building and Fire Code requirements and would be incorporated into the FMA to reduce the Project's potential to spread wildfires. As described above, regular maintenance during construction and operation would be performed in accordance with the FPP to avoid exacerbating fire risk. Therefore, impacts associated with roadway construction and maintenance would be less than significant.

As further discussed in DEIR Section 4.19, *Utilities and Service Systems*, the Project would result in the installation of utility infrastructure on site and to the terminus of 4th Street to the east of the Project site that would connect to the existing utility infrastructure within the surrounding roadways. Common ignition sources in southern California are related to power lines and vehicles. Power line-based ignitions are a major concern with respect to off-site wildfire impacts. However, this risk would be prevented by burying power lines. Burying power lines significantly eliminates a potential ignition source within the Project site and benefits the larger vicinity. The Project would underground power

lines within the Project site. In addition, a new water tank is anticipated to be installed as part of the nearby Legacy Highland Project and would be used to serve the Project's water demand, including fire protection requirements. The impacts associated with the installation of the new water tank are analyzed in the DEIR for the Legacy Highland Project. The Project would install an 18-inch waterline that would be extended westerly along 4th Street on the Project site and connect to the new water tank that is part of the nearby Legacy Highland Project. The installation of the 18-inch waterline would be inherent to the Project's construction phase. Installation and maintenance of water infrastructure would not exacerbate fire risk and would support the Project's ability to withstand fire by providing required fire flows to the Project site. As discussed under Threshold a above, the Project's paved roads would be incorporated into the FMA to reduce the Project's potential to spread wildfires and impacts and regular maintenance during construction and operation would be performed in accordance with the FPP to avoid exacerbating fire risk. Therefore, impacts associated with utilities construction and maintenance would be less than significant.

The remaining highest likelihood of vegetation 126epress126ns in the Project area would be related to existing SR-60 and other roads used by Project employees. However, the Project provides roadside fuel modification along all roads it creates and neighboring development is converting fuels along the primary access road such that it will be free of flammable roadside fuelbeds. Ongoing maintenance along SR-60 is provided and is expected to continue, if not increase in frequency as part of overall fire reduction efforts not within the control of the Project. These efforts reduce or minimize the ability for a vehicle related spark, catalytic converter failure, or other ignition source to ignite and spread fire from the roadsides into unmaintained fuels. The Project is not expected to significantly increase the already known fire risk associated with roads and in fact the Project- and road-adjacent fuel modification would aid in reducing the preexisting risk. Interior roadways are also not expected to result in significant vehicle ignitions. Jack Rabbit Trail on the Project Site to SR-60 will be restricted to serve as an emergency use road only; reducing fire risk associated with vehicle use on that road. The on-site roadways would comply with all fire department access requirements and be adjacent to fuel modification. Therefore, even if ignition were to occur on the Project interior roadways, it is highly unlikely it would spread beyond the Project site, and due to the level of hardscape and the adjacent fuel modifications areas, would result in patchy and slow fire spread and reduced fire intensity (Dudek, 2023).

In addition to the Project's utility infrastructure, the Project would result in the installation of on-site fire hydrants that are designed in accordance with the RCFD standards. The internal waterlines are anticipated to supply sufficient fire flows and pressure to meet the demands required for on-site fire hydrants. Furthermore, the Project would provide a proactive educational component to business owners with informational brochures at time of occupancy, disclosing the potential wildfire risk and the requirements identified in the Project's FPP. This educational information must include maintaining the landscape and structural components according to the appropriate standards and embracing a "Ready, Set, Go!" stance on evacuation. The "Ready, Set, Go!" concept is widely known and encouraged by the state of California and most fire agencies, including RCFD and includes: Pre-planning for emergencies, including wildfire emergencies, focuses on being prepared, having a well-defined plan, minimizing potential for errors, maintaining the Project site's fire protection systems, and implementing a conservative (evacuate as early as possible) approach to evacuation and Project

site uses during periods of fire weather extremes. The Project's educational component is not anticipated to result in temporary or ongoing impacts on the environment (Dudek, 2023).

Although the Project would result in the installation and maintenance of new infrastructure, the Project's proposed infrastructure would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be less than significant. (DEIR, pp. 4.20-19 to 4.20-21)

3.18.4 THRESHOLD D

Impact Statement: The Project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

- ❑ **Findings**

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.20.5 of the DEIR. The City finds that the development of the proposed Project will not result in significant impacts related to Threshold d; therefore, no mitigation is required.

- ❑ **Substantial Evidence**

According to RCIT and FEMA, the Project site is within an area of minimal flooding (RCIT, 2021; FEMA, 2014). The Project would maintain a similar drainage pattern as compared to existing conditions. The overall development pad would be elevated by the proposed design grading to be situated above local drainage courses. As such, the risk of flooding is low (KCG, 2019). Additionally, the implementation of the Project would result in a 98 cfs reduction in peak flows discharging from the Project site. As such, impacts related to downslope/downstream flooding and drainage changes would be less than significant.

Portions of the Project site have a "low" to "moderate" susceptibility for landslides (KCG, 2019). Regardless of the landslide susceptibility, the Project would be required by the CBC and Beaumont Building Code to comply with the recommendations identified in the Project's Preliminary Geotechnical Investigation, which would ensure that the Project is engineered and constructed to maximize stability and preclude safety hazards to on-site areas. The implementation of the Project is not anticipated to directly or indirectly cause potential substantial risks, including landslides, as a result of runoff, post-fire instability, or drainage change. Impacts would be less than significant.

Based on the foregoing analysis, the Project is not anticipated to expose people or structure to significant risks, including downslope or downstream flooding or landslides as a result of runoff, post-fire instability, or drainage change. Impacts would be less than significant. (DEIR pp. 4.20-21 to 4.20-22)

3.18.5 CUMULATIVE IMPACTS

Impact Statement: The Project would not result in a cumulatively considerable impact related to wildfire.

- **Findings**

Potential cumulative impacts of the Project related to wildfire are discussed in detail in Section 4.20.6 of the DEIR. The City finds that the development of the proposed Project would not result in significant cumulative impacts related to wildfire; therefore, no mitigation is required.

- **Substantial Evidence**

The cumulative impact analysis considers potential wildfire impacts of the Project in conjunction with other development projects in the vicinity of the Project site as well as other projects within the City.

The Project would be required to comply with the City's EOP during construction and operation. With respect to evacuation, the cumulative analysis considered the Project in conjunction with surrounding development that would utilize the same evacuation routes during a wildfire.

As described above under Threshold a, adding the maximum number of vehicles from the Project's site would increase evacuation times for surrounding development between 16 minutes and 26 minutes. However, these scenarios are highly conservative as they assume that all parking spaces are fully occupied at both the proposed Project site and the Hidden Canyon Industrial Park site. Additionally, under all scenarios, the increase in evacuation time is associated with the proposed Project, and not the surrounding land uses, as the proposed Project is located on the furthest end of the study area, and vehicles from the surrounding land uses would reach the transportation network before vehicles from the proposed Project. The Project and surrounding development can be safely evacuated under the worst-case scenario (Scenario 14: Project with Hidden Canyon Industrial Park with SR-60 Only) and would not interfere or impede with an emergency evacuation route. Additionally, although the Project is not to be considered a shelter-in-place development, because the Project site would be highly ignition resistant in terms of its buildings and landscape/hardscape, it is anticipated that an additional option available to emergency managers in some wildfire and other emergency scenarios will be directing people to temporarily remain on site and seek refuge within the ignition resistant buildings or other safe areas on the site. When an evacuation is ordered, it will occur according to pre-established evacuation decision points or as soon as notice to evacuate is received, which may vary depending on many environmental and other factors. The implementation of the Project would not result in the substantial alteration of an existing roadway such that the Project would interfere directly or indirectly with the implementation of an adopted emergency response or emergency evacuation route. Thus, the Project would not result in a significant cumulative impact.

The Project would implement FMZs and FMAs that will reduce the potential to exacerbate wildfires at the Project site and surrounding area. Additionally, the Project's proposed buildings would incorporate internal sprinkler systems and the Project would install fire hydrants on site, which would further reduce the Project's potential to exacerbate wildfire risks. As such, the Project would reduce the potential for wildfires to spread to adjacent properties. Additionally, other development Projects in the area within a VHFHSZ would incorporate FMZs and/or other infrastructure to reduce the potential to spread wildfires. Implementation of the measures will reduce the risk of wildfire spreading from the Project site into surrounding areas and will improve the ability of firefighters to fight fires on the protect

property and neighboring properties and resources, irrespective of the cause or location of ignition. As such, under Threshold b, the Project would not result in a cumulative impact.

The Project would result in the Installation of infrastructure consisting of FMAs, FMZs and utilities; however, the construction and operation of the proposed infrastructure would comply with applicable State and local standards regulating fire risk. Other projects under construction would also be required to comply with the same State and local building and fire code requirements regarding construction and access. As such, under Threshold c, the implementation of the Project would not result in a cumulative impact from the installation or maintenance of associated infrastructure.

The potential hazards related to wildfire addressed under Threshold d are unique to the Project site and are inherently restricted to the specific property proposed for development. That is, issues including downslope or downstream flooding and landslides are specific to the Project site and the immediately surrounding area. Additionally, the Project site would not influence or exacerbate downslope or downstream flooding and landslides at other, off-site properties. Due to the site-specific nature of these potential hazards and the measures to address them, there would be no direct or indirect connection to similar potential issues or cumulative effect to or from other properties. The Project would not result in a cumulative impact. (DEIR, pp. 4.20-22 to 4.20-23)

4.0 ENVIRONMENTAL IMPACTS MITIGATED TO A LEVEL OF LESS-THAN-SIGNIFICANT

4.1 BIOLOGICAL RESOURCES

4.1.1 REGULATORY REQUIREMENTS AND PROJECT DESIGN FEATURES

The Project includes the following RRs and PDFs that serve to reduce the Project's impacts. The RRs and PDFs will be included in the Project's Mitigation Monitoring and Reporting Program to ensure implementation.

RR 4-1 The Project Applicant is required to pay MSHCP development fees.

PDF 4-1 The Project would conserve 230.82 acres of open space, including 80.63 acres of native vegetation communities (1.20 acres of Southern Riparian Scrub, 1.28 acres of Chaparral and 78.15 acres of Riversidean Sage Scrub).

PDF 4-2 The Project would result in permanent impacts to vegetation communities described for conservation by the MSHCP associated with Cells 933, 936, 1030, 1032, and 1125 totaling 109.69 acres and would impact the following communities: chaparral (0.21 acre), Riversidean sage scrub (24.40 acres), non-native grassland (82.13 acres), and southern riparian scrub (0.03 acre). To offset these impacts, the Project will conserve 133.62 acres of replacement lands through the Criteria Refinement Process, including 0.32 acre of chaparral, 45.85 acres of Riversidean sage scrub, 86.03 acres of non-native grassland, and 0.22 acre of southern riparian scrub. These replacement lands are in areas that are not described for conservation by the Cell Criteria for Cells 933, 936, 1030, 1032, and 1125.

4.1.2 THRESHOLD A

Impact Statement: The Project could have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in DEIR Section 4.4.7. No special-status plants were detected at the Project site during focused plant surveys; therefore, no impact to special-status plants would occur. The Project would result in potential impacts to crotch bumble bee, coastal California gnatcatcher and burrowing owl during construction activities. Therefore, impacts to special-status animals would be potentially significant. The Project is required to comply with Mitigation Measures MM 4.4-1, MM 4.4-2, and MM 4.4-3 which would reduce impacts to less than significant. The City has determined that changes or alterations have been required in or

incorporated into the Project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

- **Substantial Evidence**

No special-status plants were detected at the Project site during focused plant surveys. Therefore, the Project would not result in an impact to special-status plants, and no impact would occur.

The Project site has the potential to support a number of animal species (raptors and bats), that might forage at the site, but would not otherwise use the site for live-in habitat, including for nesting (or roosting in the case of bats). As such, these impacts are not evaluated in the context of CEQA significance because special status for these species is in the context of breeding.

The following special-status species have the potential to use the site as live-in habitat, including Crotch bumble bee, California glossy snake, Southern grasshopper mouse, coast horned lizard, coastal whiptail, red-diamond rattlesnake, Bell's sage sparrow and Southern California rufous-crowned Sparrow, coastal California gnatcatcher, loggerhead shrike, American badger, bobcat, Dulzura pocket mouse, mountain lion, northwestern San Diego pocket mouse, southern grasshopper mouse, Stephens' Kangaroo Rat (SKR), San Diego black-tailed jackrabbit, and burrowing owl.

The Project is not required per the MSHCP to conduct presence/absence surveys for any of the above-referenced species, either because the species are fully covered and the MSHCP does not have any project-specific survey requirements for these species, or the species are not covered and survey requirements were not developed for the MSHCP. For the majority of these species, including the reptiles, loggerhead shrike, and small mammals, either there is no established survey protocol for the species or the extensive survey efforts to confirm the presence/absence of these species is not warranted. Since focused surveys were not performed for these species to confirm absence, or to determine the extent of site use by the one or more species if present, then the alternative is to acknowledge the possibility of occurrence based on the presence of suitable habitat. The likelihood is that certain species, if present, occupy a smaller portion of the site, and that although the loss of habitat might impact one or more species, impacts are not expected to be considered as "substantial adverse" impacts that would trigger a determination of significance. The coast horned lizard, coastal whiptail, red-diamond rattlesnake, coastal California gnatcatcher, loggerhead shrike, bobcat, mountain lion, northwestern San Diego pocket mouse, SKR and San Diego black-tailed jackrabbit are all MSHCP Covered Species. As such, through the participation in the MSHCP, including the payment of MSHCP development fees, impacts to these species would be less than significant. In addition, the species receive coverage under the MSHCP because lands have adequately been conserved throughout the Plan area to support coverage. Furthermore, given that adequate conservation is provided within western Riverside County for these species, the loss of habitat because of the Project would not be a substantial adverse effect to the species at the local level.

California glossy snake, American badger, Dulzura pocket mouse, and southern grasshopper mouse are not designated as Covered Species under the MSHCP as sufficient information was not available to make that determination when the MSHCP was approved. Crotch bumble bee is not a Covered

Species because at the time that the MSHCP was approved the bumble bee was not regarded with a level of sensitivity to warrant consideration. Regardless of whether these species have an official designation as a Covered Species, the lands collectively conserved as part of the MSHCP Reserve are certain to provide habitat for these species, and through participation of the Project in the MSHCP, including the proposed conservation of 230.82 acres of lands with potential habitat for these species, impacts to these species would be less than significant.

However, the Project would result in potential impacts to crotch bumble bee, coastal California gnatcatcher, and burrowing owl during construction activities. Therefore, impacts to special-status animals would be potentially significant and mitigation would be required.

In the context of biological resources, indirect edge effects are those effects associated with developing areas adjacent to native open space. The MSHCP acknowledges that in the absence of measures to address urban edge effects to open space, it is assumed that edge effects resulting from development or land use practices in proximity to conserved habitat areas include: 1) long-term presence of unshielded noise-generating land uses in proximity to the MSHCP Conservation Area; 2) unshielded night-lighting directed within the MSHCP Conservation Area; 3) use of exotic landscape plant materials that may invade native vegetation communities within the MSHCP Conservation Area; 4) discharge of uncontrolled or unfiltered urban runoff toward the MSHCP Conservation Area, including potential toxics; and 5) uncontrolled access, dumping or trespass within the MSHCP Conservation Area. In absence of measures to address these issues, edge effects would have the potential for significant indirect impacts to native biological resources. As such, projects located adjacent to the MSHCP Conservation Area are required to implement measures pursuant to the Urban/Wildland Interface Guidelines per Volume I, Section 6.1.4 of the MSHCP. With adherence to the guidelines, projects are expected to minimize potential edge effects such that a project will not have significant impacts to sensitive resources because of indirect edge effects. The Project would implement measures consistent with the MSHCP guidelines to address the following: drainage, toxics, lighting, noise, invasives, barriers, and grading/land development. (DEIR, pp. 4.4-43 to 4.4-54)

The following mitigation measures have been incorporated into the Project:

MM 4.4-1 Prior to initial site ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.), a qualified biologist will conduct a pre-construction presence/absence survey for crotch bumble bee. If the bumble bee were to be detected (or assumed present) within the development footprint, then the Project proponent shall coordinate with CDFW to address the extent of impacts and determine whether an Incidental Take Permit (ITP) would be required. If an ITP were required, then mitigation may be required by CDFW as part of the ITP process, and the conservation of the comparable open space habitat within PA 10 would be presented to support the ITP.

MM 4.4-2 Prior to initial ground-disturbing activities (including vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging, grading, etc.), a qualified biologist will conduct a pre-construction presence/absence survey for burrowing owls

within 30 days to ensure that no owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the project site prior to the initiation of ground-disturbing activities, the project proponent will immediately inform and coordinate with the RCA and the Wildlife Agencies (CDFW, USFWS) to prepare a Burrowing Owl Protection and Relocation Plan (if required), prior to initiating ground disturbance. If ground-disturbing activities occur, but the site is left undisturbed for more than 30 days, a pre-construction survey will again be necessary to ensure burrowing owl has not colonized the site since it was last disturbed. If burrowing owl is found, the same coordination described above will be necessary. The Burrowing Owl Protection and Relocation Plan, if necessary, will describe methods to safely relocate burrowing owls from the Project site (if avoidance were infeasible) and to monitor burrowing owls with an adequate setback buffer if construction would proceed at the site until the owls could be relocated.

MM 4.4-3 Prior to the issuance of grading permits or other permits allowing for ground-disturbing activities or the removal of vegetation on site, the City of Beaumont Department of Public Works shall ensure that the following note is included on the grading plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by City of Beaumont staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors:

Ground-disturbing activities (including vegetation removal) within the Criteria Area (Criteria Cells) shall be conducted outside of the coastal California gnatcatcher breeding season (between March 1 and August 15) if occupied by coastal California gnatcatcher. If ground-disturbing activities (including vegetation removal) cannot be limited to outside the coastal California gnatcatcher breeding season, a qualified biologist shall conduct a pre-construction presence/absence survey for coastal California gnatcatcher within 14 days prior to site disturbance. If the species is found, the Project proponent shall immediately inform the Wildlife Agencies (CDFW, USFWS) and ground disturbing activities within these areas will be postponed to outside of the coastal California gnatcatcher breeding season. If the species is not found, no further action is needed.

Implementation of Mitigation Measure MM 4.4-1 would ensure that appropriate preconstruction surveys are conducted prior to ground-disturbing activities and/or vegetation removal for bumble bees and an ITP be obtained, as necessary. Implementation of Mitigation Measure MM 4.4-2 would ensure that appropriate preconstruction surveys are conducted prior to ground-disturbing activities and/or vegetation removal and would ensure that owls are relocated following the Burrowing Owl Protection and Relocation Plan, if necessary. Implementation of Mitigation Measure MM 4.4-3 would ensure that appropriate preconstruction surveys are conducted if ground-disturbing activities (including vegetation removal) occur within the coastal California gnatcatcher breeding season. Implementation of the required mitigation measures would reduce Project impacts to species identified as a candidate,

sensitive, or special status species, including the crotch bumble bee, coastal California gnatcatcher and burrowing owl, to less-than- significant levels. (DEIR, pp. 4.4-62 to 4.4-65)

4.1.3 THRESHOLD B

Impact Statement: The Project could have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service.

❑ Findings

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.4.7 of the DEIR. The Project would result in a permanent impact to 0.43 acre of MSHCP riparian/riverine areas, of which 0.03 acre supports riparian habitat. Therefore, impacts to riparian habitat would be potentially significant. The City has determined that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

❑ Substantial Evidence

The Project would result in a permanent impact to approximately 58.76 acres of native vegetation communities (Chaparral, Riversidean Sage Scrub and Southern Riparian Scrub) and 328.71 acres of non-native habitats (non-native grassland) and disturbed/developed areas. Southern Riparian Scrub is considered to be a sensitive community in general as a "riparian" community. However, based on state rankings, the Riversidean sage scrub and chaparral communities are not sensitive. These vegetation communities could potentially support special-status animal species. These impacts are addressed through consistency with the MSHCP, which includes the payment of MSHCP development fees and the proposed conservation of 230.82 acres of open space, including 80.63 acres of native vegetation communities (1.20 acres of Southern Riparian Scrub, 1.28 acres of Chaparral and 78.15 acres of Riversidean Sage Scrub). Therefore, through the Project's participation in the MSHCP, impacts to vegetation communities would be less than significant.

The Project would result in a permanent impact to 0.43 acre of MSHCP riparian/riverine areas, of which 0.03 acre supports riparian habitat. Therefore, impacts to riparian habitat would be potentially significant. (DEIR pp 4.4-54 to 4.4-55)

The following mitigation measure has been incorporated into the Project:

MM 4.4-4 Prior to issuance of grading permits or other permits authorizing ground disturbance (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging), the Project Applicant shall provide evidence to the City of Beaumont that impacts to 0.31 acre of Corps jurisdiction and Regional Board jurisdiction, and 0.43 acre of CDFW jurisdiction and MSHCP riparian/riverine resources (including 0.03 acre of riparian habitat) have been mitigated through either the purchase wetland/riparian habitat establishment and/or rehabilitation credits from

an approved mitigation bank/in-lieu fee program at a minimum 1:1 ratio. Approved mitigation banks and/or in-lieu fee programs include, but are not limited to, the Riverpark Mitigation Bank, the Inland Empire Resource Conservation District In-Lieu Fee Program, and the Riverside-Corona Resource Conservation District In-Lieu Fee Program. In addition, and also prior to issuance of grading permits, the Project Applicant shall provide the City of Beaumont of a copy of the Project's CWA Section 404 permit from the Corps, Section 401 Water Quality Certification from the Regional Board, Waste Discharge Order from the Regional Board, and Fish and Game Code Section 1602 Lake and Streambed Alteration Agreement from CDFW, as applicable.

Implementation of Mitigation Measure 4.4-4 would ensure that Project impacts to 0.43 acre of MSHCP riparian/riverine resources (including 0.03 acre of riparian habitat) are mitigated through either the purchase wetland/riparian habitat establishment and/or rehabilitation credits from an approved mitigation bank/in-lieu fee program at a minimum 1:1 ratio. Implementation of the required mitigation would reduce the Project's impacts to riparian habitat to less-than-significant levels. DEIR pp. 4.4-64 to 4.4-65)

4.1.4 THRESHOLD C

Impact Statement: The Project could have substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

❑ Findings

Potential impacts of the Project related to Threshold c are discussed in detail in Section 4.4.7 of the DEIR. The Project site does not contain any State- or federally-protected wetlands, and therefore the Project would not impact wetlands. However, the Project would result in impacts to potential Corps and Regional Board jurisdictional resources and resources within CDFW jurisdiction. Project impacts to waters considered jurisdictional by the Corps, Regional Board, and/or CDFW represent a significant impact of the proposed Project. The City has determined that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

❑ Substantial Evidence

Approximately 0.02 acre of potential Corps and Regional Board jurisdictional wetlands are present within Drainage L within the Project site; however, this portion of Drainage L is located outside of the development footprint. Therefore, the Project would not result in the loss of state or federally protected wetlands, and no impact would occur. The Project would, however, result in impacts to drainages considered jurisdictional by the Corps, Regional Board, and/or CDFW.

DEIR Table 4.4-10, *Summary of Impacts to Potential Corps and Regional Board Jurisdiction*, summarizes impacts to potential resources within Corps and Regional Board jurisdiction. The Project would impact approximately 0.31 acre (5,506 linear feet) of potential Corps and Regional Board

jurisdictional resources but would not result in impacts to jurisdictional wetlands, as depicted. The Project site does not contain any State- or federally-protected wetlands, and therefore the Project would not impact wetlands. However, the Project would result in impacts to 0.31 acre (5,506 linear feet) of potential Corps and Regional Board jurisdictional resources and 0.43 acre (5,506 linear feet) of CDFW jurisdictional resources. Project impacts to waters considered jurisdictional by the Corps, Regional Board, and/or CDFW represent a significant impact of the proposed Project. Project impacts to Corps jurisdiction would require a permit pursuant to Section 404 of the CWA and water quality certification pursuant to Section 401 of the CWA from the Regional Board. Impacts to Regional Board jurisdiction Waters of the U.S. would require water quality certification pursuant to Section 401 of the CWA from the Regional Board and impacts to Regional Board jurisdictional Waters of the State would require a Waste Discharge Order from the Regional Board. Therefore, impacts to Corps and Regional Board jurisdiction would be potentially significant.

DEIR Table 4.4-11, *Summary of CDFW Jurisdictional Impacts*, summarizes impacts to potential resources within CDFW jurisdiction. The Project would result in impacts to 0.43 acre (5,506 linear feet) of CDFW jurisdiction, which includes 0.40 acre of non-riparian streambed and 0.03 acre of jurisdictional riparian habitat. Impacts to CDFW jurisdiction would require a Lake and Streambed Alteration Agreement pursuant to CFGC Section 1602. Therefore, impacts to CDFW jurisdiction would be potentially significant. (DEIR pp. 4.4-55, 4.4-56)

Refer to Mitigation Measure MM 4.4-4, above. Implementation of Mitigation Measure 4.4-4 would ensure that Project impacts to 0.31 acre of Corps jurisdiction and Regional Board jurisdiction, and 0.43 acre of CDFW jurisdiction are mitigated through either the purchase wetland/riparian habitat establishment and/or rehabilitation credits from an approved mitigation bank/in-lieu fee program at a minimum 1:1 ratio. The required mitigation also would ensure that the Project Applicant obtains appropriate permits from the Corps, Regional Board, and/or CDFW. Implementation of the required mitigation would reduce the Project's impacts to jurisdictional waters to less-than-significant levels. (DEIR pp. 4.4-64 to 4.4-66)

4.1.5 THRESHOLD D

Impact Statement: The Project has the potential to interfere with the movement of migratory nesting birds.

- ❑ **Findings**

Potential impacts of the Project related to Threshold d are discussed in detail in Section 4.4.7 of the DEIR. Although the Project would result in impacts to lands that support the local movement of wildlife, the Project is designed to support the MSHCP goals for Proposed Core 3 through its proposed conservation lands, wildlife fencing, and management of edge effects. Through compliance with MSHCP goals for Proposed Core 3, impacts to wildlife movement would be less than significant. However, the Project has the potential to impact nesting migratory birds protected by the MBTA and CFGC, should habitat removal occur during the nesting season and should nesting birds be present. Therefore, impacts to nesting birds would be potentially significant. The City has determined that

changes or alterations have been required in, or incorporated into the Project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

- **Substantial Evidence**

Wildlife Corridor

The Project site provides for the local movement of wildlife, including mountain lion, mule deer, bobcat, coyote, gray fox, and other smaller mammals, as well as general habitat, including live-in habitat for some species. As such, the Project would result in impacts to the local movement of wildlife through the Project site. However, the Project is designed to support the MSHCP goals pertaining to movement, specifically as it relates to supporting the goals of Proposed Core 3. The supporting design elements of the Project include 1) conserving the lands required by the MSHCP to support the assembly and function of Proposed Core 3; 2) installing and maintaining fencing that would separate the development footprint (including the Project's managed open space buffer) from Proposed Core 3 conservation lands; and 3) managing edge effects between the Project and the conserved lands, including lighting and noise.

The Project would conserve 230.82 acres of lands that would support the function of Proposed Core 3 consistent with the MSHCP goals of providing live-in habitat and facilitating movement, including 152.42 acres on-site and 78.40 acres off site. As Proposed Core 3 extends from northwest to southeast, the Core is bisected by SR-60 to the west of the Project. As such, SR-60 provides a constraint to movement of wildlife through Proposed Core 3. MSHCP Volume I, Section 7.5.2 provides guidelines for the construction of wildlife crossings associated with roadway projects. The MSHCP notes undercrossing structures of varying sizes should be included in a long road alignment to accommodate small, medium, and large wildlife, with multiple undercrossings for each size group depending on the length of the roadway. Caltrans is currently constructing the SR-60 Truck Lanes Project which extends for approximately 4.75 miles from approximately Gilman Springs Road on the west to a point about one mile east of the western limits of the Project site. The Caltrans work is expected to be completed by the time that construction of the Project would begin. Therefore, Project components including proposed fencing would tie in consistently with SR-60 improvements.

As part of SR-60 improvements, Caltrans is constructing eight all-weather undercrossing structures specifically for wildlife, including two 20-foot-tall by 20-foot-wide box culverts to accommodate larger wildlife (mule deer, mountain lion, and bobcat) and six smaller undercrossings. The smaller structures consist of a combination of corrugated metal pipes (CMPs), reinforced concrete pipes (RCPs) and arch concrete pipes (ACPs). Three of the eight undercrossings are being constructed for the section of SR-60 improvements that abut the northern Project boundary, including one 60-inch pipe at the western end of the Project site, one of the 20-foot by 20-foot culverts approximately 0.50 mile along the Project boundary east of the 60-inch pipe, and one 36-inch pipe another 0.50 mile to the east of the box culvert. Wildlife expected to occur at the Project site with the potential to use these three features include medium to large-sized mammals such as mule deer, mountain lion, bobcat and coyote, smaller mammals such as gray fox, raccoon and rodents, and other smaller wildlife such as reptiles and amphibians. The remaining five Caltrans undercrossings are being constructed west of the Project site, with the second 20-foot by 20-foot culvert located approximately one-mile west of the Project site.

Conservation proposed by the Project includes the northwestern corner of Cell 933, which, based on the existing Cell Criteria, is not currently described for conservation. The northwestern portion of Cell 933 is located adjacent to the Caltrans box culvert and based on the existing Cell Criteria, the box culvert might not be properly connected to the Proposed Core 3 open space. As such, one benefit of the Criteria Refinement is to place this portion of the Cell into conservation such that undercrossing is properly connected to the main portion of the Proposed Core 3 to the southwest, as requested by the RCA and Wildlife Agencies.

SR-60 improvements include a wildlife fence along both the northern and southern edges of SR-60 to minimize the likelihood that wildlife enter the roadway and direct wildlife to the areas north and south of the freeway. The eastern terminus of the SR-60 fence is being constructed just east of the proposed 36-inch pipe culvert. The proposed Project would similarly construct a wildlife fence along the western and southern edges of the Project site to prevent wildlife from entering the site from the adjacent conserved lands. The fence would be constructed approximately along the boundary between the proposed conserved lands (PA 10) and the Project's PA 9, although the exact location would vary depending on the topography. The Project's fence would tie into the SR-60 fence at the easternmost proposed wildlife CMP and would extend west and then south/southeast around the Project to direct wildlife in the northwesterly/southeasterly direction. The wildlife fencing along the Project boundary would include one-way swing gates opening into the MSHCP conservation area for any wildlife that enter the Project site from the north and east trying to escape into the adjacent conserved lands. In addition to the wildlife fence, the Project would also include six-foot tubular steel security fencing along the northern boundary abutting the SR-60 right-of-way, beginning from the wildlife fence on the west and extending east to the Project's entry point. Wildlife that either cross over or under SR-60 east of the Caltrans wildlife fence terminus would be forced to the west or east along the security fence. A swing gate would be installed to the west along the section of lateral (north-south) wildlife fence connecting to the SR-60 fence, allowing wildlife to escape the freeway right-of-way towards the conserved lands.

The Project through its design would also address edge effects relative to adjacent conserved lands. The Project's night lighting would be designed to prevent spillage into the MSHCP conserved lands along the western and southern development boundary. As such, consistent with the MSHCP Urban/Wildlife Interface Guidelines (MSHCP Volume I, Section 6.1.4), night lighting shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting to ensure ambient lighting in the MSHCP Conservation Area is not increased. Regarding noise, the Project's Maintained Open Space (i.e., PA 9) would serve as a buffer between the main development footprint and the proposed conservation lands, such that wildlife within the adjacent conserved lands would not be subjected to noise that exceeds residential standards.

In conclusion, although the Project would result in impacts to lands that support the local movement of wildlife, the Project is designed to support the MSHCP goals for Proposed Core 3 through its proposed conservation lands, wildlife fencing, and management of edge effects. Through compliance with MSHCP goals for Proposed Core 3, impacts to wildlife movement would be less than significant.

Native Wildlife Nursery Sites

The Project site does not represent a nursery site. Therefore, the Project would not result in impacts to a native wildlife nursery site. However, the Project site contains vegetation with the potential to support native nesting birds. Impacts to nesting birds are prohibited by the MBTA and CFGC. Since the Project has the potential to impact active nests regulated by the MBTA and CFGC, Project impacts to nesting birds represent a significant impact of the Project for which mitigation in the form of pre-construction surveys and avoidance of active nests would be required. (DEIR pp. 4.4-57 to 4.4-59)

The following mitigation measure has been incorporated into the Project:

MM 4.4-5 Prior to the issuance of grading permits or other permits allowing for ground-disturbing activities or the removal of vegetation on site, the City of Beaumont Department of Public Works shall ensure that the following note is included on the grading plans. Project contractors shall be required to ensure compliance with this note and permit periodic inspection of the construction site by City of Beaumont staff or its designee to confirm compliance. This note also shall be specified in bid documents issued to prospective construction contractors:

As feasible, vegetation clearing shall be conducted outside of the nesting season, which is generally identified as February 1 through September 15. If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including disking, demolition activities, and grading. If active nests are identified, the biologist shall establish suitable buffers around the nests, and the buffer areas shall be avoided until the nests are no longer occupied and the juvenile birds can survive independently from the nests.

Implementation of Mitigation Measure 4.4-5 would ensure that appropriate pre-construction surveys are conducted during the bird nesting season and would ensure that impacts to any active nests are avoided. Implementation of the required mitigation would reduce the Project's potential impacts to nesting birds to less-than-significant levels. (DEIR pp. 4.4-63, 4.4-64, 4.4-66)

4.1.6 THRESHOLD F

Impact Statement: The Project could conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

❑ Findings

Potential impacts of the Project related to Threshold f are discussed in detail in Section 4.4.7 of the DEIR. The Project would be consistent with the biological requirements of the MSHCP Reserve Assembly Requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs

and Procedures). However, implementation of Mitigation Measure 4.4-2 would be required to ensure that the Project is consistent with Section 6.3.2 (Additional Survey Needs and Procedures) of the MSHCP Reserve Assembly Requirements for Burrowing Owl. Therefore, this impact is considered potentially significant. The City has determined that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

- ❑ **Substantial Evidence**

The Project site is located in the MSHCP Criteria Area, within portions of independent Cells 933, 936, 1030, 1032, and 1125, as well as a portion of Cell Group A′, divided between two Area Plans: The Pass Area Plan (Cells 933, 936, 1030, 1032, and 1125) and the Reche Canyon/Badlands Area Plan (Cell Group A′). The Project is subject to the Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process in coordination with the City. The Project will be subject to Joint Project Review (JPR) by the RCA in order for the RCA to determine that the Project will be consistent with the MSHCP. The Project's compliance with MSHCP Reserve assembly requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures), is provided below.

- **Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (Section 6.1.2):** The Project site supports 1.18 acres of riparian habitat and 2.57 acre of riverine streambed. Although riparian habitat is present within the Project site in the form of Southern Riparian Scrub, this community does not have the potential to support least Bell's vireo, southwestern willow flycatcher, or western yellow-billed cuckoo. Within the Project site, this community is comprised of individual trees and shrubs with an herbaceous understory, and does not contain a stratified canopy or support the structural complexity required to support these species.

  The Project site does not contain 140epresssions (natural or artificial) that would inundate long enough to support resources associated with vernal pools, including fairy shrimp. The soils mapped within the Project site are categorized as sandy loam soils, which are generally not associated with vernal pools, and direct observations of the soils within the Project site showed a lack of clay soil components. Road ruts are generally not allowed to develop or persist for durations long enough to support resources associated with pools due to regular maintenance of the access roads within the Project site. Regular maintenance keeps these roads free of ruts and washouts, in order to allow operations and maintenance of various utilities (i.e., Southern California Edison transmission towers and a SoCal Gas transmission pipeline), as well as access to commercial apiary operations. In addition, no plant species were observed within the Project site that are associated with vernal pools and similar habitats that experience prolonged inundation.

  The Project would result in impacts to 0.03 acre of riparian habitat and 0.40 acre of riverine streambed. Therefore, a Demonstration of Biologically Equivalent or Superior

Preservation (DBESP) would be required for impacts to Riparian/Riverine resources. A DBESP would be completed as part of the Project. Therefore, the Project is consistent with Section 6.1.1 of the MSHCP.

- **Protection of Narrow Endemic Plants (Section 6.1.3):** Volume I, Section 6.1.3 of the MSHCP requires that within identified Narrow Endemic Plant Species Survey Areas (NEPSSA), site-specific focused surveys for Narrow Endemic Plants Species will be required for all public and private projects where appropriate soils and habitat are present. No special-status plant species were observed within the Project site during focused plant surveys. The Project site occurs within NEPSSA 8; therefore, the following target species were evaluated: many-stemmed dudleya and Yucaipa onion. As discussed above, these species are not expected to occur due to a lack of suitable (clay) soils and were not detected during focused surveys. Therefore, these species were confirmed to be absent from the Project site and the Project would not result in impacts to NEPSSA species; therefore, the Project is consistent with Section 6.1.3 of the MSHCP.

- **Guidelines Pertaining to the Urban/Wildlands Interface (Section 6.1.4):** The MSHCP Urban/Wildland Interface Guidelines are intended to address indirect effects associated with locating development in proximity to the MSHCP Conservation Area. As the MSHCP Conservation Area is assembled, development is expected to occur adjacent to the Conservation Area. Future development in proximity to the MSHCP Conservation Area may result in edge effects with the potential to adversely affect biological resources within the Conservation Area. To minimize such edge effects, the guidelines shall be implemented in conjunction with review of individual public and private development projects in proximity to the MSHCP Conservation Area. As discussed in threshold a, the Project will implement applicable measures as it relates to temporary construction impacts to minimize adverse indirect impacts on special-status resources within Conserved Lands. Therefore, the Project is consistent with Section 6.1.4 of the MSHCP.

- **Additional Survey Needs and Procedures (Section 6.3.2):** The Project site is not located within a CAPSSA, Mammal Survey Area, or Amphibian Survey Area, and does not support suitable habitat for riparian/riverine associated species (i.e. listed fairy shrimp, least Bell's vireo); therefore, surveys for these species were not required and impacts would not result from the Project.

  The Project site is located within the Burrowing Owl Survey Area. Focused surveys were conducted during the 2019 burrowing owl breeding season, with negative results. Regardless, at a minimum, a 30-day preconstruction survey will be conducted immediately prior to the initiation of construction to ensure protection for this species and compliance with the conservation goals as outlined in the MSHCP. If burrowing owls are detected on-site during the 30-day preconstruction survey, a burrowing owl relocation plan will be developed for the passive/active translocation of individuals as directed by the RCA and wildlife agencies. With incorporation of Mitigation Measure 4.4-2, the Project is consistent with Section 6.3.2 of the MSHCP.

The Project would be consistent with the biological requirements of the MSHCP Reserve Assembly Requirements, Section 6.1.2 (Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools), Section 6.1.3 (Protection of Narrow Endemic Plant Species), Section 6.1.4 (Guidelines Pertaining to the Urban/Wildlands Interface), and Section 6.3.2 (Additional Survey Needs and Procedures). However, implementation of Mitigation Measure 4.4-2 would be required to ensure that the Project is consistent with Section 6.3.2 (Additional Survey Needs and Procedures) of the MSHCP Reserve Assembly Requirements for Burrowing Owl. Therefore, this impact is considered potentially significant. (DEIR, pp. 4.4-59 to 4.4-61)

Refer to Mitigation Measure MM 4.4-2, above. Implementation of Mitigation Measure 4.4-2 would be required to ensure that the Project is consistent with Section 6.3.2 (Additional Survey Needs and Procedures) of the MSHCP Reserve Assembly Requirements for Burrowing Owl. Implementation of the required mitigation would ensure the Project's consistency with the MSHCP. (DEIR, pp. 4.4-63, 4-64, 4.4-66)

4.1.7 CUMULATIVE IMPACTS

Impact Statement: The Project could have significant cumulative biological impacts without implementation of mitigation measures.

❑ Findings

Potential cumulative impacts of the Project related to biological resources are discussed in detail in DEIR Section 4.4.8. No special-status plants were detected at the Project site during focused plant surveys; therefore, no impact to special-status plants would occur. The Project would result in potential impacts to crotch bumble bee, coastal California gnatcatcher and burrowing owl during construction activities. Therefore, impacts to special-status animals would be potentially significant. The Project is required to comply with Mitigation Measures MM 4.4-1, MM 4.4-2, and MM 4.4-3 which would reduce impacts to less than significant. The City has determined that changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

❑ Substantial Evidence

This cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development in the vicinity of the Project site. The cumulative impact evaluation also takes into consideration the geographic area covered by the Western Riverside County MSHCP, which is the prevailing habitat conservation plan applicable to the Project site.

The temporary direct and/or indirect impacts of the Project would not result in significant cumulative impacts to environmental resources within the region of the Project site. Cumulative impacts refer to incremental effects of an individual project when assessed with the effects of past, current, and proposed projects. The MSHCP was developed to address the comprehensive regional planning effort and anticipated growth in the City. Projects in the area would be required to comply with the MSHCP

and to mitigate project impacts consistent with MSHCP requirements. The Project would result in permanent impacts to vegetation communities described for conservation by the MSHCP associated with Cells 933, 936, 1030, 1032, and 1125 totaling 109.69 acres and would impact the following communities: chaparral (0.21 acre), Riversidean sage scrub (24.40 acres), non-native grassland (82.13 acres), and southern riparian scrub (0.03 acre). To offset these impacts, the Project would conserve 133.62 acres of replacement lands, including 0.32 acre of chaparral, 45.85 acres of Riversidean sage scrub, 86.03 acres of non-native grassland, and 0.22 acre of southern riparian scrub consistent with the MSHCP. Additionally, the Project would potentially impact MSHCP covered species (coast horned lizard, coastal whiptail, red-diamond rattlesnake, coastal California gnatcatcher, loggerhead shrike, bobcat, mountain lion, northwestern San Diego pocket mouse, SKR and San Diego black-tailed jackrabbit). Impacts to covered species would be mitigated through a combination of general MSHCP compliance, pre-construction surveys, protection plans and avoidance, as required through implementation of Mitigation Measures MM 4.4-1, MM 4.4-2, MM 4.4-3, and MM 4.4-5. Non-covered sensitive floral species were not detected or expected to occur within or adjacent to the Project and therefore the development of the Project site would not result or contribute to a cumulative impact to non-covered species. A few non-covered sensitive faunal species have potential to occur within the Project site, and so the Project could contribute to a cumulative impact for these species. However, adequate lands would be conserved by the Project as part of the MSHCP conservation to address these species and reduce any impacts to below a level of significance. Furthermore, the Project has been designed and mitigated to remain in compliance with all MSHCP conservation goals and guidelines which other projects are required to do as well, and therefore would not result in an adverse cumulative impact.

The Project would also impact jurisdictional waters (0.31 acres of Corps and Regional Board jurisdiction, and 0.43 acres of CDFW jurisdiction and MSHCP riparian/riverine resources, of which 0.03 acre is vegetated riparian habitat). Through the implementation of Mitigation Measure MM 4.4-4, the Project would be required to purchase wetland/riparian habitat establishment and/or rehabilitation credits from an approved mitigation bank/in-lieu fee program at a minimum 1:1 ratio. (DEIR, pp. 4.4-61 to 4.4-62) Because any other projects in the area that impact jurisdictional waters would be required to mitigate for those impacts, and the Project has mitigated for its impacts, there are no cumulative impacts to jurisdictional waters that result from the Project.

4.2 CULTURAL RESOURCES

4.2.1 THRESHOLD B

Impact Statement: The Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

- ❑ **Findings**

Potential impacts of the Project related to Threshold b (historical resources) are discussed in detail in Section 4.5.6 of the DEIR. No known prehistoric archeological resources are present on the Project site. Nonetheless, the potential exists for Project-related ground-disturbing activities to result in a direct impact to significant subsurface prehistoric archaeological resources should such resources be discovered during Project-related ground-disturbing activities. The Project is required to comply with

Mitigation Measures MM 4.5-1 and 4.5-2, which would reduce impacts to less than significant. The City has determined that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

- **Substantial Evidence**

Although the Beaumont Pointe Specific Plan Project will result in direct impacts to recorded cultural resources RIV-5060, RIV-5061, P-33-006229, P-33-009027, P-33-015672 and P-33-015673, based on the cultural resources inventory and records search, an intensive pedestrian survey, and Phase II significance testing, it was determined that there are no unique or significant archaeological resources on the Project site and site-specific mitigation measures with respect to these artifacts are not required. Therefore, implementation of the Project would result in less than significant impacts associated with known archaeological resources. However, due to the presence of cultural resources documenting prehistoric and historic use of this property, and the poor ground visibility during the survey, there is a potential to impact buried prehistoric archaeological resources during ground disturbance activities (i.e., grading and excavation activities), which would result in a potentially significant impact. (DEIR p. 4.5-16)

The following mitigation measures have been incorporated into the Project:

MM 4.5-1 Prior to issuance of a grading permit, the Project Applicant shall provide written verification in the form of a letter from the archaeologist to the City's Community Development Director stating that a certified archaeologist that meets the U.S. Secretary of Interior Standards has been retained to implement the monitoring program. The archaeologist shall be present during all ground-disturbing activities to identify any known or suspected archaeological and/or cultural resources. The archaeologist will conduct a Cultural Resource Sensitivity Training, in conjunction with the consulting Native American Tribe(s) Tribal Historic Preservation Officer (THPO), and/or designated Tribal Representative. The training session will focus on the archaeological and tribal cultural resources that may be encountered during ground-disturbing activities as well as the procedures to be followed in such an event. The certified archaeologist and consulting tribe(s) representative shall attend the pre-grading meeting with the contractors to explain and coordinate the requirements of the monitoring program.

MM 4.5-2 Prior to any ground-disturbing activities the project archaeologist shall develop a Cultural Resource Management Plan (CRMP) and/or Archaeological Monitoring and Treatment Plan (AMTP) to address the details, timing, and responsibilities of all archaeological and cultural resource activities that occur on the project site. This Plan should be written in consultation with the consulting Tribe[s] and shall include the following: approved mitigation measures, conditions of approval, contact information for all pertinent parties, parties' responsibilities, procedures for each mitigation measure and condition of approval, and an overview of the project schedule. The

monitoring program shall include the following requirements for each phase of ground disturbance:

a) During all ground-disturbing activities, the qualified archaeologist and the Native American monitor shall be on-site full-time. The frequency of inspections will depend upon the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in Public Resources Code Section 21074. Archaeological and Native American monitoring will be discontinued when the depth of grading and the soil conditions no longer retain the potential to contain cultural deposits. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring.

b) In the event that previously unidentified cultural resources are discovered, the qualified archaeologist and Native American monitor shall have the authority to divert or temporarily halt ground disturbance operation in the area of discovery to allow for the evaluation of potentially significant cultural resources. Isolates and clearly non-significant deposits will be minimally documented in the field so the monitored ground disturbance activities can proceed. If a potentially significant cultural resource(s) is discovered, work shall stop within a 60-foot perimeter of the discovery and an environmentally sensitive area physical demarcation/barrier constructed. The archaeologist shall contact the City and consulting tribe(s) at the time of discovery. The archaeologist, in consultation with the City, the consulting tribe(s), and Native American monitor, shall determine the significance of the discovered resources.

c) A recommendation for the treatment and disposition of the tribal cultural resource shall be made by the qualified archaeologist in consultation with the tribe(s) and the Native American monitor and be submitted to the City for review and approval. Treatment and disposition may include full avoidance; preservation in place; reburial in a permanent conservation easement or deed restriction away from future impact areas; or excavation and curation in a facility that meets Federal Curation Standards (CFR 79.1).

   The City must concur with the evaluation before ground disturbance activities will be allowed to resume in the affected area. For significant cultural resources meeting the definition of a historical resource per CEQA Section 15064.5(a) or a unique archaeological resource per CEQA Section 21083.2(g), a Research Design and Data Recovery Program to mitigate impacts shall be prepared by the consulting archaeologist and approved by the City before being carried out using professional archaeological methods.

d) Before ground disturbance activities are allowed to resume in the affected area, the artifacts shall be recovered and features recorded using professional archaeological

methods. The archaeologist shall determine the amount of material to be recovered for an adequate artifact sample for analysis.

e) All cultural material collected during the grading monitoring program shall be processed and curated according to the current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility, to be accompanied by payment of the fees necessary for permanent curation.

f) A report documenting the field and analysis results and interpreting the artifact and research data within the research context shall be completed and submitted to the City's Community Development Director for approval and subsequently submitted to the Eastern Information Center, and consulting tribe(s), prior to the issuance of a certificate of occupancy for the first building in each phase of ground disturbance.

Implementation of Mitigation Measure MM 4.5-1 and 4.5-2 would ensure the proper identification and subsequent treatment of any significant archaeological resources that may be encountered during ground-disturbing activities associated with implementation of the Project. With implementation of the required mitigation, the Project's potential impacts to important archaeological resources would be reduced to less than significant. (DEIR pp. 4.5-16 to 4.5-18, 4.5-20)

4.2.2 CUMULATIVE IMPACTS

Impact Statement: The Project would not result significant cumulative cultural resources impacts.

❑ Findings

As discussed, under Threshold b, above, there are no significant archaeological resources located on the Project site. Impacts to previously undiscovered subsurface archeological resources are typically site specific from ground disturbing activities and generally do not combine to result in cumulative impacts, unless resources are identified immediately adjacent to the Project site. The nearest development to the Project is Hidden Canyon Industrial Park to the east, which has been graded and is currently under development. Further, site-specific archeological resource investigations would be required for other projects before the City would permit ground disturbances or demolition or substantial alteration of existing structures. Such investigations would include some degree of surface-level surveying and identify resources on the affected project sites that are or appear to be eligible for listing on the national or state registers for historic resources. Such investigations would also recommend mitigation measures to protect and preserve cultural resources. Therefore, cumulative impacts to archaeological resources would be less than significant.

4.3 GEOLOGY AND SOILS

4.3.1 THRESHOLD F

Impact Statement: The Project would have potential to directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

❑ Findings

Potential impacts of the Project related to Threshold f are discussed in detail in Section 4.7.6 of the DEIR. The Project site is identified as within an area of "High" Paleontological Sensitivity; therefore, implementation of the Project would result in potentially significant impacts associated with paleontological resources. The Project could result in direct impacts to paleontological resources within the Project site should such resources be discovered during Project-related construction activities. The Project is required to comply with Mitigation Measures MM 4.7-1 to 4.7-3, which would reduce impacts to less than significant. The City has determined that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

❑ Substantial Evidence

Because the City does not have specific guidelines for the preservation of paleontological resources, the City elects to use Riverside County guidelines for rating the paleontological sensitivity of geologic formations. A paleontological sensitivity map generated by the Riverside County Land Information System in February 2021 ranks most of the Project area as having a High Paleontological Potential/Sensitivity (High A). The category "High A" indicates that fossils are likely to be encountered at the surface and may be impacted during excavation by construction activities.

The Project site has a high potential to contain paleontological resources due to the: 1) presence of the middle Pliocene to lower Pleistocene fossiliferous middle member of the San Timoteo Formation, 2) recovery of fossils from the formation within and nearby the Project site boundaries, and 3) "High" Paleontological Sensitivity assigned to the San Timoteo Formation for yielding paleontological resources. The San Timoteo Formation also extends below the cover of young alluvial fan deposits and would be exposed during grading activities. Areas having a low paleontological sensitivity are represented by Holocene (modern) young alluvial fan deposits lining the drainage valleys. Generally, these sedimentary deposits do not yield fossils, being too young.

A paleontological literature review and collections and records search was performed by the Los Angeles County Museum (LACM). The review did not find any documented paleontological localities (fossil sites) held by the LACM from within the Project site; however, six localities held by the LACM are just west of the southernmost portion of the Project site. Significant fossil vertebrate remains "may well" be encountered in any digging in the San Timoteo Formation, as well as in older Quaternary alluvial deposits that may underlie the younger alluvium mapped on the surface within the Project site. However, based upon the topography and the distribution of the various Quaternary deposits in the Project vicinity, it is more likely that the San Timoteo Formation underlies the young alluvial fan deposits within the Project site.

Therefore, there is a high probably of encountering paleontological resources during grading activities that impact the San Timoteo Formation and Quaternary older alluvial fan sediments. Impacts to paleontological resources would be significant. (DEIR, pp. 4.7-22 to 4.7-23)

"ATTACHMENT I"

The following mitigation measures have been incorporated into the Project:

MM 4.7-1 Prior to issuance of grading permits, the Project Applicant shall retain a qualified paleontologist. Paleontological monitoring of the young alluvial fan deposits is not warranted, since their potential to yield fossils is low. However, if, during earth disturbance activities, the San Timoteo Foundation or older Quaternary alluvial deposits is exposed beneath the overlying young alluvial fan deposits, monitoring should be initiated during periods in which the San Timoteo Formation or older Quaternary alluvial deposits will be impacted. Monitoring shall be conducted during any grading or excavation in undisturbed sediments of the San Timoteo Foundation. Complete grading plans for each phase shall be made available to the City of Beaumont and to the paleontologist/ paleontological monitor prior to the start of any earth-moving activities for each phase.

MM 4.7-2 Prior to initiation of any grading and/or excavation activities, a preconstruction meeting shall be held and attended by the paleontologist of record, representatives of the grading contractor and subcontractors, the project owner or developer, and a representative of the lead agency. The nature of potential paleontological resources shall be discussed, as well as the protocol that is to be implemented following discovery of any fossiliferous materials.

MM 4.7-3 Paleontological monitors shall be equipped to salvage fossils as they are unearthed to avoid construction delays. The monitor shall be empowered to temporarily halt or divert equipment to allow removal of abundant or large specimens in a timely manner. Monitoring may be reduced if the potentially fossiliferous units are not present in the subsurface, or if present, are determined upon exposure and examination by qualified paleontological personnel to have low potential to contain fossil resources. Fossil discovery and salvage shall occur as follows:

g) Notification of fossil discoveries shall be immediately reported by the paleontologist or paleontological monitor to the City of Beaumont, the Project owner or developer, and the consulting company overseeing development of the Project.

h) Paleontological salvage shall complete with professional standard protocols, as detailed in Section VII, Paleontological Resource Impact Mitigation Program in *Technical Appendix F2* of the DEIR.

i) In the laboratory, individual fossils shall be cleaned of extraneous matrix, any breaks repaired, and the specimen, if needed, stabilized by soaking in an archivally approved acrylic hardener (e.g., a solution of acetone and Paraloid B-72).

j) The recovered specimens shall be prepared to a point of identification and permanent preservation (not display), including screen-washing of sediments to recover small invertebrates and vertebrates.

k) The prepared specimens, along with relevant information, shall be curated into a professional, accredited public museum repository with a commitment to archival conservation and permanent retrievable storage (e.g., the Western Science Center in Hemet, California). The paleontological program should include a written repository agreement prior to the initiation of mitigation activities. The City of Beaumont may select another repository if it so desires.

l) A final monitoring and mitigation report of findings and significance, including lists of all fossils recovered and necessary maps and graphics to accurately record their original location, shall be prepared. The report, when submitted to, and accepted by, the City of Beaumont, shall signify satisfactory completion of the project program to mitigate impacts to any potential non-renewable paleontological resources (i.e., fossils) that might have been lost or otherwise adversely affected without such a program in place.

Implementation of Mitigation Measures MM 4.7-1 through 4.7-3 would ensure the proper identification and subsequent treatment of any significant paleontological resources that may be encountered during ground-disturbing activities associated with implementation of the proposed Project. With implementation of the required mitigation, the Project's potential impacts to important paleontological resources would be reduced to less than significant. The Project's contribution to cumulative impacts would likewise be reduced to less than significant. (DEIR, pp. 4.7-25 to 4.7-26)

4.3.2 CUMULATIVE IMPACT

Impact Statement: The Project would have potential to result in cumulative impacts to paleontological resources.

- **Findings**

Potential cumulative impacts of the Project related to paleontological resources are discussed in detail in Section 4.7.7 of the DEIR. The Project site is identified as within an area of "High" Paleontological Sensitivity; therefore, implementation of the Project could result in potentially significant impacts associated with paleontological resources. The Project could result in direct impacts to paleontological resources within the Project site should such resources be discovered during Project-related construction activities. The Project is required to comply with Mitigation Measures MM 4.7-1 to 4.7-3, which would reduce impacts to less than significant. The City has determined that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

- **Substantial Evidence**

The Project's potential to result in impacts to paleontological resources (Threshold f) is similar to that of other projects located in the region that are underlain by alluvial fan deposits. The Project-specific PRIMP, required as Mitigation Measures MM 4.7-1 through MM 4.7-3, would ensure Project-specific paleontological impacts are reduced to less than significant. Therefore, the Project's contribution to a cumulatively considerable impacts is less than significant. (DEIR, pp. 4.7-23 to 4.7-24)

4.4 TRIBAL CULTURAL RESOURCES

4.4.1 REGULATORY REQUIREMENTS

The following Regulatory Requirements (RRs) are applicable regardless of CEQA and would apply to any project under similar circumstances and, therefore, do not constitute mitigation measures. However, they will nonetheless be included in the Project's Mitigation Monitoring and Reporting Program to ensure the implementation of the mandated RRs.

RR 18-1 **Inadvertent Discovery of Human Remains**. Should human remains and/or cremations be encountered on the surface or during any and all ground-disturbing activities (i.e., clearing, grubbing, tree and bush removal, grading, trenching, fence post placement and removal, construction excavation, excavation for all water supply, electrical, and irrigation lines, and landscaping phases of any kind), work in the immediate vicinity of the discovery shall immediately stop within a 100-foot perimeter of the discovery. The area shall be protected; project personnel/observers will be restricted. The County Coroner is to be contacted within 24 hours of discovery. The County Coroner has 48 hours to make his/her determination pursuant to State and Safety Code Section 7050.5 and Public Resources Code Section 5097.98.

In the event that the human remains and/or cremations are identified as Native American, the Coroner shall notify the Native American Heritage Commission within 24 hours of determination pursuant to subdivision (c) of Health and Safety Code Section 7050.5.

The Native American Heritage Commission shall immediately notify the person or persons it believes to be the Most Likely Descendant (MLD). The MLD has 48 hours, upon being granted access to the Project site, to inspect the site of discovery and make his/her recommendation for final treatment and disposition, with appropriate dignity, of the remains and all associated grave goods pursuant to Public Resources Code Section 5097.98

Unless otherwise required by law, the site of any reburial of Native American human remains or associated grave goods shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act. Pursuant to the specific exemption set forth in California Government Code Section 6254(r), the

sheriff-coroner, parties, and lead agencies will be asked to withhold public disclosure information related to such reburial.

4.4.2 THRESHOLD A

Impact Statement: The Project has the potential to cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is (1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) or (2) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

- **Findings**

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.18.7 of the DEIR. The NAHC SLF search did not indicate the presence of any sacred sites or locations of religious or ceremonial importance within the search radius. Additionally, all previously recorded cultural resources were evaluated as not significant and ineligible for listing on the CRHR. There are no significant historical resources pursuant to Section 15064.5 located within the Project site. Although no tribal cultural resources are known to occur within the Project's impact limits, implementation of the Project has the potential to cause a substantial adverse change in the significance of tribal cultural resources that may be buried beneath the site's surface or in on-site vegetation. The Project is required to comply with Mitigation Measures MM 4.5-1 and 4.5-2 set forth in Section 4.2, above, and which ensure the proper identification and subsequent treatment of any significant resources that may be encountered during ground-disturbing activities associated with implementation of the Project. These mitigation measures would reduce impacts to less than significant. The City has determined that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

- **Substantial Evidence**

As discussed in Phase I and Phase II Cultural Resources Assessment (DEIR *Technical Appendix D*), BFSA requested a review of the Sacred Lands Files (SLF) by the NAHC in March of 2019 to determine if any recorded Native American sacred sites or locations of religious or ceremonial importance are present within one mile of the project. The NAHC SLF search did not indicate the presence of any sacred sites or locations of religious or ceremonial importance within the search radius.

Additionally, all previously recorded cultural resources were evaluated as not significant and ineligible for listing on the CRHR and NRHP. There are no significant historical resources pursuant to Section 15064.5 located within the Project site. However, because multiple resources have been identified on

the Project site, and due to heavy vegetation during the survey, there remains the potential that previously unobserved resources may exist.

Native American Consultation

The City sent notification to the Native American tribes with traditional or cultural affiliation to the area that previously requested consultation pursuant to AB 52 and SB 18 requirements.

Of the 10 tribes that were sent notifications letters, three requested government-to-government consultation: Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians, and Soboba Band of Mission Indians. In a letter dated December 15, 2020, the Augustine Band of Cahuilla Mission Indians stated that they were unaware of specific cultural resources that may be affected by the Project but would like to be notified in the event cultural resources are discovered during development.

The City submitted the Phase I and Phase II Cultural Resources Assessment (*Technical Appendix D*) to three tribes that requested consultation and conducted telephone consultations with Agua Caliente Band of Cahuilla Indians on March 2, 2021 and Morongo Band of Mission Indians on February 2, 2021. The Agua Caliente Band of Cahuilla Indians and Morongo Band of Missions Indians requested revisions to the cultural resources assessment and mitigation, which were incorporated into *Technical Appendix D*. To date the Soboba Band of Mission Indians have not responded to schedule consultation.

Based on information provided in DEIR Section 4.5, *Cultural Resources*, and consultation with Native American tribes, there is potential that buried tribal cultural resources could be encountered during ground-disturbing activities. Accordingly, there is a potential for significant impacts to occur during grading. (DEIR, pp. 4.18-13 to 4.18-14)

Refer to Mitigation Measures MM 4.5-1 and MM 4.5-2, in Section 4.2, above which address archeological resources. Implementation of Mitigation Measures MM 4.5-1 and MM 4.5-2, would ensure that grading and other ground-disturbing activities during construction are monitored by a qualified archaeologist as well as Native American monitors. The mitigation measures further require the proper treatment of any resources that may be uncovered, and the avoidance of disturbance in areas where potential resources are uncovered. With implementation of the required mitigation measures, the Project would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and potential Project and cumulative impacts would be reduced to less than significant levels. (DEIR, p. 4.18-15)

4.4.3 CUMULATIVE IMPACT

Impact Statement: The Project has the potential to result in cumulative impacts to tribal cultural resources.

❑ Finding

Potential cumulative impacts of the Project related to tribal cultural resources are discussed in detail in Section 4.18.8 of the DEIR. Although no tribal cultural resources are known to occur within the Project's impact limits, implementation of the Project has the potential cause a substantial adverse change in the significance of tribal cultural resources that may be buried beneath the site's surface or in on-site vegetation. The Project is required to comply with Mitigation Measures MM 4.5-1 and 4.5-2, which would reduce impacts to less than significant. The City has determined that changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the DEIR.

❑ Substantial Evidence

This cumulative impact analysis considers development of the Project in conjunction with other development projects and planned development projects in the vicinity of the Project site that are in the western area of Riverside County and the traditional use of the Agua Caliente Band of Cahuilla Indians, Morongo Band of Mission Indians, Torres-Martinez Desert Cahuilla Indians, Santa Rosa band of Cahuilla Indians, Ramona band of Cahuilla Indians, Cabazon Band of Mission Indians, Soboba Band of Mission Indians, Cahuilla Band of Indians, Los Coyotes Band of Cahuilla and Cupeno Indians, and Augustine Band of Cahuilla Mission Indians.

As noted previously, the City conducted Native American consultation with potentially culturally affiliated tribes, as required by AB 52 and SB 18. Although other development projects in the traditional use area for the above listed culturally affiliated tribes may impact significant tribal cultural resources, impacts are generally site-specific resulting from ground disturbing activities; however, discovery of resources could contribute knowledge regarding other resources farther away from the Project site. Therefore, cumulative impacts to tribal cultural resources have the potential to occur.

However, with implementation of Mitigation Measure 4.5-1, Project impacts to tribal cultural resources would be less than significant. Other projects will also be required to comply with all applicable existing statutes, regulations, procedures, and policies that address tribal cultural resources, including consultation under SB 18 and/or AB 52. Other development projects will also implement mitigation measures similar to Mitigation Measures MM 4.5-1 and MM 4.5-2 to ensure impacts to tribal cultural resources are fully mitigated to a less than significant level. With implementation of Mitigation Measures MM 4.5-1 and 4.5-2, the Project would not to contribute towards a significant cumulative impact associated with the significance of a tribal cultural resource or a collection of resources pursuant to CEQA Guidelines Section 15064.5. Therefore, with mitigation, the Project would not result in a significant cumulative impact related to tribal cultural resources. (DEIR, po. 4.18-14 to 4.18-15)

5.0 ENVIRONMENTAL IMPACTS THAT REMAIN SIGNIFICANT AND UNAVOIDABLE AFTER MITIGATION

The City finds the project would result in significant and unavoidable impacts in the following impact categories after implementation of all feasible mitigation measures: Air Quality, Greenhouse Gas Emissions, Noise, and Transportation. In accordance with CEQA Guidelines Section 15092(b)(2), The City cannot approve the project unless it first finds (1) under Public Resources Code Section 21081(a)(3), and CEQA Guidelines Section 15091(a)(3), that specific economic, legal, social technological, or other considerations, including provisions of employment opportunities to highly trained workers, make infeasible the mitigation measures or project alternatives identified in the EIR; and (2) under CEQA Guidelines Section 15092(b), that the remaining significant effects are acceptable under CEQA Guidelines Section 15093 because the economic, legal, social, technological or other benefits of the proposed project outweigh its unavoidable adverse environmental effects. Therefore, a statement of overriding considerations has been prepared (see Section 9.0, herein).

5.1 AIR QUALITY

5.1.1 THRESHOLD A

Impact Statement: The Project would conflict with or obstruct implementation of the applicable air quality plan.

- **Findings**

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.3.6 of the DEIR. The Project would be inconsistent with South Coast AQMD Air Quality Management Plan (AQMP) because 1) will would exceed regional significance thresholds, resulting in NAAQS and CAAQS violations; and 2) would exceed the assumptions in the AQMP based on the years of project buildout phase. Specifically, the Project would exceed regional thresholds of significance for NOx during construction and for NOx, CO, PM_{10}, and $PM_{2.5}$ during operation even after mitigation. The Project's regional exceedance for VOCs during construction would be mitigated to less than significant level with the implementation of Mitigation Measure MM 4.3-1. Further, The Project would require a General Plan Amendment and therefore is inconsistent with the land use assumptions on which the AQMP was based and is conservatively assumed to generate operational source emissions not accounted for in the AQMP. As such, the Project is considered to be inconsistent with the AQMP and significant impacts would occur.

The Project is required to comply with Mitigation Measures MM 4.3-1 through 4.3-17, which includes all feasible mitigation measures recommended in the FEIR and would reduce impacts related to NOx, CO, PM_{10}, and $PM_{2.5}$ emissions during both construction and operation to the extent feasible. The implementation of mitigation measures, the Project's emissions-reducing design features and operational programs, including but not limited to South Coast AQMD Rule 2305 (WAIRE) are consistent with and support overarching AQMP air pollution reduction strategies. Project support of these strategies would globally promote timely attainment of AQMP air quality standards and would bring the Project into conformance with the AQMP to the extent feasible. However, impacts would

remain significant and unavoidable. The City finds that the above mitigation measures are feasible, are adopted, and will reduce air quality impacts attributable to the proposed Project.

Several mitigation measures were recommended by commenters on the DEIR. These measures were evaluated in the FEIR and were: 1) already required through regulatory requirements, project design features, or mitigation; 2) added as mitigation and included, herein; or 3) determined to be infeasible. For example, due to the reasons described under "Substantial Evidence below, the requirement that all heavy-duty vehicles must be zero emission was found to be economically and technologically infeasible because they are not commercially available for the foreseeable future. Additionally, regulations that control heavy-duty truck emissions are the responsibility of the State and outside of the responsibility and control of the City. Therefore, pursuant to Section 21081(a)(3) of the California Public Resources Code, control of tailpipe emissions are within the responsibility and jurisdiction of another public agency and have been adopted by that other agency. See FEIR, Response to Comments B-34 through B-63 and D-4 through D-29.

Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described below, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR.

- **Substantial Evidence**

The South Coast AQMD's 2016 AQMP is the applicable air quality plan for the Project area, which estimates long-term air quality conditions for the SCAB. The 2016 AQMP continues to evaluate current integrated strategies and control measures to meet the NAAQS, as well as explore new and innovative methods to reach its goals. Some of these approaches include utilizing incentive programs, recognizing existing co-benefit programs from other sectors, and developing a strategy with fair-share reductions at the federal, state, and local levels. The 2016 AQMP incorporates scientific and technological information and planning assumptions, including the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS), a planning document that supports the integration of land use and transportation to help the region meet the federal CAA requirements.

Criteria for determining consistency with the AQMP are defined in Chapter 12, Section 12.2 and Section 12.3 of the 1993 CEQA Handbook. These indicators are discussed below:

- ***Consistency Criterion No. 1:*** *The proposed project will not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay the timely attainment of air quality standards or the interim emissions reductions specified in the AQMP.*

Consistency Criterion No. 1 refers to violations of the CAAQS and NAAQS. CAAQS and NAAQS, or violations would occur if LSTs or regional significance thresholds are exceeded. The Project's localized construction-source emissions would not exceed applicable LST thresholds. However, the Project's regional construction-source emissions would exceed the applicable regional thresholds for

emissions of VOCs and NOx. As such, the the Project has the potential to result in a significant impact with respect to this criterion and the Project would have the potential to conflict with the AQMP according to this criterion, and could be potentially significant.

The Project would not exceed the LST thresholds for operational activity. However, the regional operational-source emissions are anticipated to exceed the regional thresholds of significance for NOx, VOC, CO, PM_{10}, and $PM_{2.5}$ emissions and would not be reduced to less than significant with imposition of mitigation measures. As such, the Project has the potential to result in a significant impact with respect to this criterion and the Project would have the potential to conflict with the AQMP according to this criterion.

Based on the preceding, the Project is determined to be inconsistent with the first criterion and impacts would be potentially significant.

- ***Consistency Criterion No. 2:*** *The Project will not exceed the assumptions in the AQMP based on the years of project build-out phase.*

The *2016 AQMP* demonstrates that the applicable ambient air quality standards can be achieved within the timeframes required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in City's General Plan is considered to be consistent with the AQMP**.**

Peak day emissions generated by construction activities are largely independent of land use assignments, but rather are a function of development scope and maximum area of disturbance. Irrespective of the site's land use designation, development of the site to its maximum potential would likely occur, with disturbance of the entire site occurring during construction activities. As such, since the Project would exceed applicable NOx regional emissions thresholds during construction activity, a significant impact would result.

The Project is proposed to consist of a maximum of 246,000 sf of general commercial uses in addition to a 125-room hotel and a maximum of 4,995,000 sf of industrial uses. The Project would provide 124.7 acres of open space to accommodate landscaped manufactured slopes, fuel modification areas, and natural open space as a buffer to adjacent conservation area and 152.4 acres of open space – conservation. The open space – conservation area would be preserved as natural habitat as required by the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). Associated improvements to the Project site would include, but are not limited to, paved roads, paved parking areas, drive aisles, truck courts, utility infrastructure, landscaping, water quality basins, signage, lighting, property walls, gates, and fencing, including perimeter fencing for the Project site.

Implementation of the Project would require approval of a General Plan Amendment. The General Plan Amendment would re-designate approximately 539.9 acres from "Rural Residential" to "General Commercial" (30.2-acres), "Industrial" (232.6-acres), "Open Space" (124.7-acres), and "Open Space – Conservation." (152.4-acres). Permitted uses within the "General Commercial" land use will include

a wide range of recreation and entertainment, retail, restaurant, hotel, service-oriented land uses, and self-storage. Examples of recreation and entertainment uses may include indoor and/or outdoor go kart racing, rock climbing, trampoline park, bowling alley, and miniature golf. Allowable uses within the "Industrial" land use designation primarily include high-cube warehousing (warehouse/distribution center for the receipt, storage, cold storage and distribution of goods, products, supplies) and general light industrial. Other uses also permitted include but are not limited to manufacturing, distribution warehouses, e-commerce fulfillment, research services and laboratories, repair services, and various indoor recreational uses. Lastly, areas designated for "Open Space" uses would include landscaped, manufactured slopes, fuel modification areas, project signage, as well as the natural slopes which form a buffer between the Specific Plan's developed areas and the "Open Space – Conservation."

Accordingly, the 2016 AQMP does not reflect the proposed land use designation for the Project site. For this reason, there is the potential for the Project to exceed air quality impact assumptions in the AQMP or increments based on the years of Project build-out phase. Consequently, the development of the Project is conservatively assumed to generate operational-source emissions not reflected within the current 2016 AQMP regional emissions inventory for the SCAB (Urban Crossroads, 2022a, pp. 68-69).

Based on the preceding, the Project is determined to be inconsistent with the second criterion and impacts would be potentially significant. (DEIR pp. 4.3-36 to 4.3-38)

The Project would be required to implement the following mitigation measures, as provided in DEIR Section 4.3.9, *Mitigation*, and updated in DEIR Section 3.0, *Clarifications and Revisions*:

MM 4.3-1 The Project shall utilize "Super-Compliant" low VOC paints for nonresidential interior and exterior surfaces and low VOC paint for parking lot surfaces. Super-Compliant low VOC paints have been reformulated to be more stringent than the regulatory VOC limits put forth by South Coast AQMD's Rule 1113. Super- Compliant low VOC paints shall be no more than 10g/L of VOC. Alternatively, the applicant may utilize tilt-up concrete buildings that do not require the use of architectural coatings.

MM 4.3-2 Prior to the start of construction activities, the project applicant, or its designee, shall ensure that all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Final engines, except where the project applicant establishes to the satisfaction of the City of Beaumont (City) that Tier 4 Final equipment is not available. An exemption from these requirements may be granted by the City if the City documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment to the extent feasible. Before an exemption may be considered by the City, the applicant shall be required to demonstrate that two construction fleet owners/operators in Riverside County were contacted and that those owners/operators confirmed Tier 4 Final equipment could not be located within Riverside County. In order to meet this requirement to demonstrate that such equipment is not available, the Project Applicant must seek bids/proposals

from contractors of large fleets, defined by the California Air Resources Board as, "A fleet with a total max hp (as defined below) greater than 5,000 hp." In addition, this should not be limited to Riverside County but statewide. In the event that Tier 4 Final equipment is not feasible, then Tier 4 interim equipment shall be required. In the event that Tier 4 Interim equipment is not available, Tier 3 equipment shall be used. All construction equipment shall be tuned and maintained in accordance with the manufacturer's specifications.

MM 4.3-3 All on-site outdoor cargo-handling equipment (including yard trucks, hostlers, yard goats, pallet jacks, forklifts, and other on-site equipment) shall be electric or non-diesel fueled. All on-site indoor forklifts shall be powered by electricity.

MM 4.3-4 Legible, durable, weather-proof signs shall be placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include: 1) instructions for truck drivers to shut off engines when not in use; 2) instructions for drivers of diesel trucks to restrict idling to no more than three (3) minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged; and 3) telephone numbers of the building facilities manager and the CARB to report violations. Prior to the issuance of an occupancy permit, the City shall conduct a site inspection to ensure that the signs are in place.

MM 4.3-5 Prior to tenant occupancy, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that occupants/tenants of the Project site have been provided documentation on funding opportunities, such as the Carl Moyer Program and other Programs promulgated by South Coast AQMD (which can be found at the SCAQMD Incentives & Programs landing page, http://www.aqmd.gov/home/programs) that provide incentives for using cleaner-than-required engines and equipment.

MM 4.3-6 Prior to issuance of occupancy permits for the industrial/warehouse buildings, the Project operator shall prepare and submit a Transportation Demand Management (TDM) program detailing strategies that would reduce the use of single occupant vehicles by employees by increasing the number of trips by walking, bicycle, carpool, vanpool and transit. The TDM shall include, but is not limited to the following:

- Provide a transportation information center and on-site TDM coordinator to educate employers, employees, and visitors of surrounding transportation options.
- Promote bicycling and walking through design features such as showers for employees, self-service bicycle repair area, etc. around the project site.
- Provide secure bicycle storage space equivalent to 2% of the automobile parking spaces provided.

- Provide on-site car share amenities for employees who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day.
- Promote and support carpool/vanpool/rideshare use through parking incentives and administrative support, such as ride-matching service.
- Incorporate incentives for using alternative travel modes, such as preferential load/unload areas or convenient designated parking spaces for carpool/vanpool users.
- Provide meal options on-site or shuttles between the facility and nearby meal destinations.
- Each building shall provide preferred parking for electric, low-emitting and fuel – efficient vehicles equivalent to at least 8% of the required number of parking spaces.

MM 4.3-7 For the warehouse/industrial portion of the Project, the buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed to supply power for the future installation of electric vehicle (EV) truck charging stations on the site. Conduit should be installed from the electrical room to tractor trailer parking spaces in logical location(s) on the site determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available and the buildings are being served by trucks with electric-powered engines.

The buildings' electrical room shall be sufficiently sized to hold additional panels that may be needed in the future to supply power to trailers with transport refrigeration units (TRUs) during the loading/unloading of refrigerated goods. Conduit should be installed from the electrical room to the loading docks determined by the Project Applicant during construction document plan check as the logical location(s) to receive trailers with TRUs.

MM 4.3-8 Final Project designs shall provide for installation of conduit in tractor trailer parking areas for the purpose of accommodating potential installation of EV truck charging stations.

MM 4.3-9 All truck/dock bays that serve cold storage facilities within the proposed buildings shall be electrified to facilitate plug-in capabilities and support use of electric standby and/or hybrid electric transport refrigeration units (TRUs). All site and architectural plans submitted to the City Planning Department shall note all the truck/dock bays designated for electrification. Prior to the issuance of a Certificate of Occupancy, the City Building Department shall verify electrification of the designated truck/dock bays.

MM 4.3-10 All landscaping equipment (e.g., leaf blower) used for property management shall be electric powered only. The property manager/facility owner shall provide documentation (e.g., purchase, rental, and/or services agreement) to the Planning

Department to verify, to the City's satisfaction, that all landscaping equipment utilized will be electric powered.

MM 4.3-11 If the Project constructs a go-kart facility in the commercial area, all go-karts would be required to be electric or zero emissions.

MM 4.3-12 Prior to the issuance of occupancy permits for any of the industrial/warehouse buildings, the Planning Department shall confirm that tenant lease agreements require the Project Applicant to provide $1.00 per square foot in funding for fleet upgrade financing to be used over the term of their lease on Zero Emissions (ZE) and Near Zero Emissions (NZE) delivery vans or trucks. This requirement shall apply to new leases only (not renewals) and for the first 10 years of the Project's life. The funding shall be provided in the form of lease allowance/concession. The allowance shall be a reimbursement once ZE or NZE medium/heavy duty vehicles are purchased and can be used at any time during the lease term (i.e., the landlord shall reimburse the tenant once the tenant provides receipt of paid invoice for the order). If a tenant leases their fleet, this allowance shall also cover the cost to lease ZE or NZE trucks. This measure would also facilitate compliance with South Coast AQMD Rule 2305.

MM 4.3-13 Plans submitted for grading permit issuance and building permit issuance shall specify a designated area of the construction site where electric or non-diesel vehicles, equipment, and tools can be fueled or charged. The provision of temporary electric infrastructure for such purpose shall be approved by the utility provider, Southern California Edison (SCE). If SCE will not approve the installation of temporary power for this purpose, the establishment of a temporary electric charging area will not be required. If electric equipment will not be used on the construction site because the construction contractor(s) does not have such equipment in its fleet (as specified in Mitigation Measure MM 4.3-14), the establishment of a temporary electric charging area also will not be required. If electric powered equipment is in the contractor(s) equipment fleet, and SCE approval is secured, the temporary charging location is required to be established upon issuance of grading permits and building permits.

MM 4.3-14 If electric or non-diesel off-road trucks and construction support equipment, including but not limited to hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors are available in the construction contractor's equipment fleet and can fulfill the Project's construction requirements during the building construction, paving, and architectural coating phases of Project construction, such equipment shall be used during Project construction. This requirement shall be noted on plans submitted for building permit issuance.

MM 4.3-15 Project construction contractors shall maintain records of all off-road diesel construction equipment associated with Project construction to document that each off-road diesel construction equipment used meets emission standards. Records shall be kept on-site for the duration of construction activities and shall be made available for periodic inspection by City of Beaumont staff or their designee.

MM 4.3-16 During construction activities, the City shall conduct periodic inspections to verify compliance with construction-related mitigation measures pursuant to the Mitigation Monitoring and Reporting Program.

MM 4.3-17 Prior to building final, the Project Applicant or successor in interest shall install signs at each truck exit driveway that provides directional information to the City's truck route. Text on the sign shall read "To Truck Route" with a directional arrow.

As part of the FEIR, the City considered a recommendation to require that all heavy-duty vehicles engaged in drayage to or from the Project site to be zero emission beginning in 2030. However, at present, requiring zero-emission vehicles is economically and technologically infeasible; also, such vehicles are not available on a large enough scale to be relied upon. In a report titled "Transitioning to Zero-Emission Heavy-Duty Freight Vehicles," the International Council on Clean Transportation (ICCT) provides an overview of advancing technologies (ICCT, September 2017). The ICCT reports that although the technology is advancing and although at some point in the distant future non-diesel technology will likely be used in mass to power freight movement, "zero-emission vehicle technologies do present considerable challenges. They have a combination of near- and long-term barriers, issues, and questions that will have to be addressed before they can become widespread replacements for conventional trucks and tractor-trailers that are typically diesel fueled" (ICCT, p. 31). "Tesla's announced battery electric semi-tractor prototype is the only battery electric project we found in our [world-wide] assessment targeting long-haul heavy-duty applications" (ICCT, p. 31). Imposing extensive requirements on the proposed Project related to emerging technology, when the various types of technological advancements and their timeframes for common availability are not known with any certainty, is not a feasible mitigation measure.

Further, South Coast AQMD recently adopted a Warehouse Indirect Source Rule, Rule 2305, in May 2021. Rule 2305 applies to warehouse operators and owners of warehouses greater than or equal to 100,000 square feet of indoor floor space within a single building that may be used for warehousing activities. As discussed in Section 4.3, *Air Quality*, of the DEIR, the Project would be subject to compliance with Rule 2305 (refer to Pages 4.3-22 and 4.3-23). Because compliance will be implemented by lessees, the specific measures that will be implemented to comply with Rule 2305 are not known at this time, although they potentially would include use of electric of heavy duty trucks. Mitigation Measure 4.3-12 requires the City's Planning Department to confirm that tenant lease agreements requiring the Project Applicant to provide $1.00 per square foot in funding for fleet upgrade financing to be used over the term of their lease on Zero Emissions (ZE) and Near Zero Emissions (NZE) delivery vans or trucks. Compliance with Rule 2305 would reduce air quality effects associated with the warehouse industry, including the Project, throughout the air basin, although quantification of such reductions is not feasible at this time.

The Project would be inconsistent with AQMP Criterion No. 1 and 2, resulting in a potentially impact significant. The Project would implement development-specific air quality mitigation measures (Mitigation Measures MM 4.3-1 through 4.3-17), to reduce the Project's construction-source and operational-source air pollutant emissions. A detailed explanation of why Mitigation Measures MM 4.3-1 through 4.3-17 would not reduce Project emissions to less than significant is provided in Section 5.1.2, "Substantial Evidence," below (see also DEIR pp. 4.3-54 to 4.3-58). Additionally, incorporation

of contemporary energy-efficient technologies and operational programs, and compliance with South Coast AQMD emissions reductions and control requirements would reduce Project air pollutant emissions. The implementation of mitigation measures, Project's emissions-reducing design features, and operational programs are consistent with and support overarching AQMP air pollution reduction strategies. Project support of these strategies would globally promote timely attainment of AQMP air quality standards and would bring the Project into conformance with the AQMP to the extent feasible. However, impacts would remain significant and unavoidable. (DEIR pp. 4.3-50 to 4.3-54)

5.1.2 THRESHOLD B

Impact Statement: The Project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.

- ❑ **Findings**

Air pollution by nature is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and the South Coast AQMD develops and implements plans for future attainment of ambient air quality standards. Based on these considerations, project-level thresholds of significance for criteria pollutants are used by the South Coast AQMD to determine whether a project's individual emissions would have a cumulatively significant impact on air quality. The potential for the project to result in a cumulatively considerable impact, specifically a cumulatively considerable new increase of any criteria pollutant for which the project region is nonattainment under an applicable NAAQS and/or CAAQS is potentially significant. Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.3.6 of the DEIR. The Project-specific evaluation of emissions demonstrates that Project construction-source and operation-source air pollutant emissions would result in exceedances of regional thresholds for criteria pollutants VOCs, NOx, CO, PM_{10}, and $PM_{2.5}$ for which the project region is in non-attainment for ozone and particulate matter. Therefore, Project impacts would be significant on a project-specific and cumulative basis for those emissions. The Project is required to comply with Mitigation Measures MM 4.3-1 through 4.3-17, which would reduce impacts to the extent feasible. Even with the Project's compliance with applicable rules, and the imposition of all feasible mitigation measures, the Project's construction NOx and operational VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emissions would exceed South Coast AQMP regional thresholds of significance.

Several mitigation measures were recommended by commenters on the DEIR. These measures were evaluated in the FEIR and were: 1) already required through regulatory requirements, project design features, or mitigation; 2) added as mitigation and included, herein; or 3) determined to be infeasible. For example, due to the reasons described under Section 5.1.1 "Substantial Evidence" above, the requirement that all heavy-duty vehicles must be zero emission was found to be economically and technologically infeasible because they are not commercially available for the foreseeable future. Additionally, regulations that control heavy-duty truck emissions are the responsibility of the State and outside of the responsibility and control of the City. Therefore, pursuant to Section 21081(a)(3) of the California Public Resources Code, control of tailpipe emissions are within the responsibility and

jurisdiction of another public agency and have been adopted by that other agency. See FEIR, Response to Comments B-34 through B-63 and D-4 through D-29.

As such, Project impacts are considered significant and unavoidable. The City finds that the above mitigation measures are feasible, are adopted, and will reduce air quality impacts attributable to the proposed Project to the extent feasible. Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described below, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR.

- **Substantial Evidence**

Construction

Construction is expected to occur over a 56-month period. The Project consists of grading (including blasting) of the Project site, construction of the proposed buildings, and eventual operation of the completed proposed buildings. South Coast AQMD Rules that are currently applicable during construction activity for this Project include but are not limited to Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings).

DEIR Table 4.3-6, *Maximum Daily Peak Construction Emission Summary*, shows that estimated maximum daily construction emissions without mitigation resulting from Project construction will exceed criteria pollutant thresholds established by the South Coast AQMD for VOC and NO_X during construction activity. Therefore, impacts would be potentially significant.

After application of regulatory controls such as Rule 403, the Project construction-source emissions would exceed South Coast AQMD regional thresholds for VOC and NO_X emissions prior to mitigation. With the implementation of Mitigation Measure MM 4.3-1 (see above), however, Project construction-source emissions of VOCs would be reduced to less than significant levels. Even after implementation of Mitigation Measure MM 4.3-2, NO_X emissions would still exceed applicable South Coast AQMD thresholds.

With respect to NOx, based on discussions with contractors regarding availability of equipment in Riverside County, it is anticipated due to the size of the Project that there may be a lack of availability of sufficient Tier 4 equipment for construction of the Project. Accordingly, notwithstanding Mitigation Measure MM 4.3-2 which requires use of Tier 4 equipment to the extent feasible, to evaluate the effect of mitigation on NOx impacts from construction, it is conservatively assumed that 50% all off-road diesel construction equipment used for project construction would be available to comply with Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 4 off-road emissions standards or equivalent and the remaining 50% with Tier 3 off-road emissions standards. Applying these assumptions, after implementation of Mitigation Measure MM 4.3-2, Project construction-source emissions with respect to NOx is considered significant and unavoidable. (DEIR pp. 4.3-38 to 4.3-39, 4.3-54)

Operation

Operational activities for summer and winter scenarios are presented in DEIR Table 4.3-7, *Summary of Peak Operation Emissions*. During Phase 1, the Project would exceed the numerical thresholds of significance established by the South Coast AQMD for emissions of NO_X. During Phase 2, the Project will exceed the thresholds of significance for emissions of VOC, NO_X, PM_{10}, and $PM_{2.5}$. During Phase 3, the Project would exceed the numerical thresholds of significance for emissions of VOC, NO_X, PM_{10}, and $PM_{2.5}$. Therefore, impacts would be potentially significant.

The Project would exceed regional thresholds of significance established by the South Coast AQMD for emissions of CO, VOC, NO_X, PM_{10}, and $PM_{2.5}$. During Phase 1, the Project would exceed the numerical thresholds of significance established by the South Coast AQMD for emissions of NO_X. During Phase 2, the Project will exceed the thresholds of significance for emissions of VOC, NO_X, PM_{10}, and $PM_{2.5}$. During Phase 3, the Project would exceed the numerical thresholds of significance for emissions of VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$. (DEIR pp. 4.3-39 to 4.3-41)

Even with the Project's compliance with applicable rules, and the imposition of all feasible mitigation measures identified above (see MM 4.3-3 through MM 4.3-17), the Project's operational NOx, CO, PM_{10}, and $PM_{2.5}$ emissions would exceed the applicable regional thresholds of significance. As such, Project operational-source NOx, CO, PM_{10}, and $PM_{2.5}$ emissions are considered significant and unavoidable.

It should be noted that, approximately 91% of the Project's NO_X emissions, 93% of the Project's CO emissions, 99% of the Project's PM_{10} emissions, and 97% of the Project's $PM_{2.5}$ emissions are derived from vehicle usage which cannot be directly regulated by the City. Neither the Project Applicant nor the Lead Agency can substantively or materially affect reductions in project-related vehicular source emissions beyond the regulatory requirements, and mitigation measures identified herein. While there are no feasible mitigation measures that would reduce vehicular emissions, as discussed in the mitigation measures section above, the Project will install electric vehicle supply equipment in accordance with California Building Code which will allow charging stations to be supplied based on demand. Charging stations could lead to less use of gasoline-burning automobiles over time as more electric vehicles and trucks come into usage, and thus, would result in less air pollutant emissions. Additionally, the Project would be required to implement on-site renewable energy to offset 20% of the expected energy demand for the commercial and industrial land uses as required by compliance with the County of Riverside's Climate Action Plan (CAP). Hence, overall, there are no additional feasible mitigations that would reduce emissions consistent with the 2015 Air Quality Attainment Plan, and this impact is considered significant and unavoidable.

The majority of the Project's NO_X and PM_{10}, and $PM_{2.5}$ emissions are derived from are from the transportation sector, and vast majority of the project's emissions are associated with emissions generated by trucks. In general, the state strategy for the transportation sector for medium and heavy-duty trucks is focused on making trucks more efficient and expediting truck turnover and eventually utilizing electric trucks as they become available rather than reducing VMT from trucks. This is in contrast to the passenger vehicle component of the transportation sector where both per-capita VMT

reductions and an increase in vehicle efficiency and electric vehicle usage are forecasted to be needed to achieve the overall state emissions reductions goals. Regulating tailpipe emissions is beyond the scope of the Project Applicant or the City and no feasible mitigation measures exist that would reduce these emissions to levels that are less-than-significant.

The Project would also be required to be consistent with the provisions of interior and exterior bicycle storage as a sustainable design strategy consistent with CALGreen. Furthermore, the Project would install 60 electric vehicles (EV) charging stations and clean air/vanpool parking stalls at the Project site, which would contribute to and support the use of more EVs and ridesharing and consequently reduce air quality emissions associated with passenger vehicle travel.

Emissions associated with heavy duty trucks involved in goods movements are generally controlled on the technology side and through fleet turnover of older trucks and engines to newer and cleaner trucks and engines. The first battery-electric heavy-heavy duty trucks are being tested this year and South Coast AQMD is looking to integrate this new technology into large-scale truck operations. The following state strategies would reduce air quality emissions and GHG emissions from the medium and heavy-duty trucks when implemented:

- CARB's Mobile Source Strategy focuses on reducing emissions through the transition to zero and low emission vehicles and from medium-duty and heavy-duty trucks.

- CARB's Sustainable Freight Action Plan establishes a goal to improve freight efficiency by 25% by 2030, deploy over 100,000 freight vehicles and equipment capable of zero emission operation and maximize both zero and near-zero emission freight vehicles and equipment powered by renewable energy by 2030.

- CARB's Emissions Reduction Plan for Ports and Goods Movement (Goods Movement Plan) in California focuses on reducing heavy-duty truck-related emissions focus on establishment of emissions standards for trucks, fleet turnover, truck retrofits, and restriction on truck idling. While the focus of Goods Movement Plan is to reduce criteria air pollutant and air toxic emissions, the strategies to reduce these pollutants would also generally have a beneficial effect in reducing GHG emissions.

In addition, the US EPA, CARB, and South Coast AQMD are currently in the rule development processes for the following strategies:

- US EPA Cleaner Truck Initiative: In response to a petition from SCQMD, the US EPA has committed to updating its truck engine standard to reduce NOx emissions.

- CARB's Transport Refrigeration Unit Regulation. Measure to reduce residual risk from TRUs by transitioning to zero-emission technologies.

- CARB's Advanced Clean Truck Rule: Requires truck manufacturers to sell an increasing percentage of zero-emission trucks by 2030 (up to 15% or 50%, depending on truck type). Also, this proposed rule would require one-time fleet reporting for large businesses.

- CARB's Zero-Emission Fleet Rule: Would require some fleets to transition to zero-emissions.
- CARB's Heavy-Duty Low NOx Program: Would set new statewide engine standards, test cycles, and warranty and durability requirements to reduce NOx from trucks.
- CARB's Heavy-Duty Inspection/Maintenance Program: Would set new inspection and maintenance requirements to ensure emissions controls are functioning properly.
- South Coast AQMD's Warehouse Indirect Source Review (ISR): South Coast AQMD adopted an ISR rule for warehouse distribution centers 100,000 square feet and larger. The Warehouse ISR requires warehouse projects to implement facility-based measures or pay a fee that would reduce local air quality emissions.

These strategies would contribute to reducing heavy duty truck emissions associated with the Project over time. The Project would not conflict with these strategies. Trucks on site are required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, currently in effect, which requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated emissions.

Additionally, the Project applicant proposes the Project Design Features (PDFs) 8-1 through PDF 8-5 and Mitigation Measure MM 4.8-1 that would be incorporated into the Project design and constructed or implemented as part of the Project. PDFs are specific design and/or operational characteristics proposed by the Project Applicant that are incorporated into the Project. These measures are all designed to reduce GHG emissions attributable to the Project. Although not quantifiable, some of these measures will have a co-benefit of reducing air quality emissions. Therefore, the emissions summary shown in DEIR Table 4.3-7 is a conservative forecast of air quality emissions and the Project is likely to be less than the total shown in DEIR Table 4.3-7 above.

Despite the design features and mitigation measures provided by the Project and the anticipated regulations implemented by the US EPA and CARB to improve truck efficiency, the estimated long-term emissions generated under full buildout of the Project would exceed the South Coast AQMD's regional operational significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB. In addition, regarding VOC, it is important to note that the majority of on-site operational VOC emissions are derived from consumer products. For analytical purposes, consumer products include cleaning supplies, aerosols, and other consumer products. As such, the Project Applicant cannot meaningfully control the use of consumer products by future building users via mitigation. On this basis, it is concluded that Project operational-source VOC emissions cannot be definitively reduced below applicable South Coast AQMD thresholds and are considered significant and unavoidable. Therefore, the Project would result in a significant and unavoidable impact. (DEIR pp. 4.3-51 to 4.3-58)

5.1.3 CUMULATIVE IMPACTS

Impact Statement: The Project would result in cumulatively considerable air quality impacts for construction (NOx) and operational regional emissions for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$.

❑ Finding

Potential cumulative impacts of the Project related to air quality are discussed in detail in Section 4.3.7 of the DEIR. The Project would result in and cause NAAQS or CAAQS violations due to exceedance of regional thresholds for which the regional is in nonattainment for ozone and particulate matter. The Project would require a General Plan Amendment. Furthermore, the Project would exceed applicable regional thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$, on a project- and cumulative level, see section 5.1.2, above. As such, the Project is considered to be inconsistent with the AQMP and a significant impact would occur. The Project is required to comply with Mitigation Measures MM 4.3-1 through 4.3-17, which would reduce impacts to the extent feasible. The implementation of mitigation measures, the Project's emissions-reducing design features and operational programs are consistent with and support overarching AQMP air pollution reduction strategies. Project support of these strategies would globally promote timely attainment of AQMP air quality standards and would bring the Project into conformance with the AQMP to the extent feasible. However, impacts would remain significant and unavoidable. The City finds that the above mitigation measures are feasible, are adopted, and will reduce air quality impacts attributable to the proposed Project.

Several mitigation measures were recommended by commenters on the DEIR. These measures were evaluated in the FEIR and were: 1) already required through regulatory requirements, project design features, or mitigation; 2) added as mitigation and included, herein; or 3) determined to be infeasible. For example, due to the reasons described under Section 5.1.1 "Substantial Evidence" above, the requirement that all heavy-duty vehicles must be zero emission was found to be economically and technologically infeasible because they are not commercially available for the foreseeable future. Additionally, regulations that control heavy-duty truck emissions are the responsibility of the State and outside of the responsibility and control of the City. Therefore, pursuant to Section 21081(a)(3) of the California Public Resources Code, control of tailpipe emissions are within the responsibility and jurisdiction of another public agency and have been adopted by that other agency. See FEIR, Response to Comments B-34 through B-63 and D-4 through D-29.

Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described below, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR.

❑ Substantial Evidence

The cumulative study area for air quality includes the City and the SCAB. The SCAB is designated as a nonattainment area for State standards of O_3, PM_{10}, and $PM_{2.5}$. The region is also designated as a nonattainment area for federal standards of O_3 and $PM_{2.5}$. Cumulative growth in population, vehicle use, and industrial activity could inhibit efforts to improve regional air quality and attain the ambient air quality standards. Thus, with exception of odors, the setting for this cumulative analysis consists of the SCAB and associated growth and development anticipated in the air basin. For the issue of odors, the cumulative study area includes the Project site and lands in close proximity to the Project site, as odors diminish rapidly with distance from the source.

According to South Coast AQMD, projects that exceed the project-specific significance thresholds are considered by the South Coast AQMD to be cumulatively considerable. Conversely, projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant. The Project would exceed the Project-specific regional significance thresholds for VOC, NOx, CO, PM_{10}, and $PM_{2.5}$ emissions. Therefore, impacts with regard to those thresholds would be cumulatively considerable.

As shown in DEIR Table 4.3-6, *Maximum Daily Peak Construction Emission Summary*, construction activities associated with the Project would exceed the significance results established by the South Coast AQMD for VOC and NO_X. However, as discussed above, with the implementation of Mitigation Measure MM 4.3-1, Project construction-source emissions of VOCs would be reduced to less than significant levels and NOx would remain significant and unavoidable. Accordingly, impacts associated with Project-related construction emissions for NOx would be significant and cumulatively considerable.

As shown in DEIR Table 4.3-7, *Summary of Peak Operation Emissions*, Project operation-source emissions would exceed the South Coast AQMD regional thresholds of significance for emissions of VOC, NO_X, PM_{10}, and $PM_{2.5}$. Therefore, impacts associated with Project-related operational emissions would be significant and cumulatively considerable. (DEIR pp. 4.3-49 to 4.3-50)

As discussed in Sections 5.1.1 and 5.1.2, the Project would implement development-specific air quality mitigation measures (Mitigation Measures MM 4.3-1 through 4.3-17), to reduce the Project's construction-source and operational-source air pollutant emissions. Additionally, incorporation of contemporary energy-efficient technologies and operational programs, and compliance with South Coast AQMD emissions reductions and control requirements would reduce Project air pollutant emissions. However, with implementation of all feasible mitigation measures, Project's emissions-reducing design features, and operational programs, impacts would remain significant and unavoidable. (DEIR pp. 4.3-50 to 4.3-54)

5.2 GREENHOUSE GAS EMISSIONS

5.2.1 PROJECT DESIGN FEATURES

The Project includes the following Project Design Features (PDFs) that serve to reduce the Project's Greenhouse Gas (GHG) impacts. The PDFs will be included in the Project's Mitigation Monitoring and Reporting Program to ensure implementation of the PDFs.

PDF 8-1 Office space within the warehouses shall be insulated with a minimum R-13 value in the walls and R-30 in the attic, and all windows will have a minimum 0.57 U-factor and 0.32 SHGC or greater.

PDF 8-2 All roofs within the Project shall be rated at 0.15 aged solar reflectance and 0.75 thermal emittance or greater.

PDF 8-3 Occupant sensing lighting that dims to at least 50% when unoccupied shall be installed within the interior areas of warehouses. All interior lighting shall be LED lighting with 40 lumens/watt for 15 watt or less fixtures, 50 lumens/watt for 15-40 watt fixtures, and 60 lumens/watt for all fixtures exceeding 40 watts.

PDF 8-4 Office space heating within warehouses must utilize heat pumps with ducting insulation of R-4.2 or greater.

PDF 8-5 Tenant lease agreements for the Project shall include contractual language restricting trucks and support equipment from nonessential idling longer than 3 minutes while on site in compliance with the City of Beaumont Idling Ordinance.

5.2.2 THRESHOLD A

Impact Statement: The Project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.8.7 of the DEIR. Project GHG emissions will result in a total of approximately 63,911.07 $MTCO_2e$ per year, which would exceed the 3,000 $MTCO_2e$ per year threshold. Therefore, impacts are significant. The Project applicant proposes the Project Design Features (PDFs) 8-1 through PDF 8-5 which are measures all designed to reduce GHG emissions attributable to the Project. Moreover, the Project is required to comply with Mitigation Measures MM 4.3-3 through MM 4.3-17 and MM 4.8-1, which would reduce GHG impacts to the extent feasible. However, even with the implementation of mitigation measures, the Project's GHG emissions are estimated to be approximately 60,638.09 MT CO_2e per year and impacts would remain significant and unavoidable. The City finds that the above PDFs and mitigation measures are feasible, are adopted, and will reduce GHG impacts attributable to the proposed Project. There are no additional measures available that would further reduce emissions because the majority of the Project's emissions come from mobile sources which are regulated by the State and not the City of Beaumont.

Several mitigation measures were recommended by commenters on the DEIR. These measures were evaluated in the FEIR and were: 1) already be required through regulatory requirements, project design features, or mitigation; 2) added as mitigation and included, herein; or 3) determined to be infeasible. For example, due to the reasons described under Section 5.1.1 "Substantial Evidence" above, the requirement that all heavy-duty vehicles must be zero emission was found to be economically and technologically infeasible because they are not commercially available for the foreseeable future. Additionally, regulations that control heavy-duty truck emissions are the responsibility of the State and outside of the responsibility and control of the City. Therefore, pursuant to Section 21081(a)(3) of the California Public Resources Code, control of tailpipe emissions are within the responsibility and jurisdiction of another public agency and have been adopted by that other agency. See FEIR, Response to Comments B-34 through B-63 and D-4 through D-29.

As shown in the DEIR, Section 4.8, *Greenhouse Gas Emissions*, the Project requires compliance with a variety of GHG reduction measures. Mitigation Measure MM 4.8-1 requires that the Project provide documentation during the plan check process demonstrating that the Project will implement measures identified in DEIR Table 4.8-6, which were obtained from the Riverside County Greenhouse Gas Emissions Screening Table or that the Project achieves equivalent emission reductions from other measures approved by the City. Implementing these mitigation measures is required to be verified by the City prior to the issuance of the final Certificate of Occupancy. The Project as described in the FEIR identified a minimum requirement of 581 points under the County of Riverside Climate Action Plan (CAP; DEIR p. 4.8-38). The FEIR and underlying technical GHG emissions quantification is conservative and did not take credit for emissions reductions that would occur associated with the Project Design Features (PDFs) and Mitigation Measures (MMs) specified in the FEIR, including, but not limited to:

- Installation of electric vehicle (EV) passenger vehicle charging stations (Table 4.8-6 & MM 4.8-1)
- Installation of conduit in tractor trailer parking areas to accommodate installation of EV truck charging stations and to supply power to trailers with transport refrigeration units (TRUs) during the loading/unloading of refrigerated goods and a sufficiently sized electrical room for additional panels (MMs 4.3-7 and 4.3-8)
- On-site idling of no more than three minutes per idling event (MM 4.3-4 & PDF 8-3)
- Electrification of truck bays serving refrigerated trucks (MM 4.3-9)
- Funding for Zero Emission (ZE) and Near Zero Emission (NZE) vans or trucks by providing a $1 per square foot lease credit to industrial tenants who purchase ZE or NZE vehicles (MM 4.3-12)

In addition, the Project Applicant added the following project design features and measures:

- The industrial portion of the Project will meet LEED-ready requirements.
- Natural gas will be prohibited in the industrial buildings,
- New recycling measures
- An increase in the number of EV charging stations for passenger cars from 60 to 175 as required by the updated CalGreen Building Code requirements.

At the time the DEIR was prepared, only four mitigation measures (MM 4.3-10, MM 4.8-1, MM 4.3-6, and MM 4.8-1) were quantified to provide a conservative analysis of emissions reductions for Air Quality and Greenhouse Gas emissions. The Air Quality & Greenhouse Gas Evaluation (see Attachment A of the Supplemental CEQA Memorandum) provides additional quantification of emissions reductions from project design features and mitigation measures described in the EIR but not quantified and from quantification of the new measures, which together would further reduce GHG emissions by 7,233.29 metric tons annually. In total, the Project would reduce GHG emissions by 10,506.27 metric tons annually. However, the Project would result in a total of approximately 53,404.80 MTCO2e per year and continue to result in a significant and unavoidable impact. The new measures further reduce impacts and do not result in a new significant environmental impact or substantial increase in severity of an environmental impact. Therefore, this does not represent significant new information as defined in Section 15088.5(a) of the State CEQA Guidelines. The new

measures do not change the finding in the Final EIR that there are no additional feasible mitigation measures available that would further reduce emissions because the majority of the Project's emissions come from mobile sources which are regulated by the State and not the City of Beaumont.

To reflect the additional measures added in response to Planning Commission requested modifications, Mitigation Measure MM 4.8-1 has been revised and MM 4.8-2 is proposed to increase the number of points that would be implemented from the Riverside County Greenhouse Gas Emissions Screening Tables and to prohibit natural gas in the industrial and warehouse components of the Project, respectively.

MM 4.8-1 Prior to issuance of building permits, the Project shall provide documentation to the City as part of the plan check process demonstrating that the Project will measures identified in the Riverside County Greenhouse Gas Emissions Screening Tables, 2019 up to a minimum of 1,850 points. The Project may also achieve equivalent emission reductions from other measures approved by the City. Implementing these mitigation measures shall be verified by the City prior to the issuance of final Certificate of Occupancy.

MM 4.8-2 The Project shall prohibit the use of natural gas in the industrial and warehouse components of the Project within Planning Areas 4 through 8, which shall be verified during plan check.

The revisions quantify reductions from existing measures, add recently adopted regulatory requirements, or make other minor modifications to the EIR that lessen GHG impacts without causing any new environmental impacts. Therefore, criteria for recirculation set forth in Section 15088.5(a) and (b) of the State CEQA Guidelines are not met.

Pursuant to Section 21081(a)(3) of the California Public Resources Code, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR.

- **Substantial Evidence**

For construction phase Project emissions, GHGs are quantified and amortized over 30 years, the economic life of a development project. To amortize the emissions over the life of the Project, the South Coast AQMD recommends calculating the total GHG emissions for the construction activities, dividing it by a 30-year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions (DEIR Table 4.8-3, *Amortized Annual Construction Emissions*).

The annual GHG emissions associated with the operations of the Project would result in direct and indirect emissions of CO_2, CH_4, and N_2O and would not generate other GHGs of sufficient quantity to affect the analysis, and the focus is on these three GHG emissions. Direct Project-related GHG

emissions include emissions from construction activities, area sources, and mobile sources, while indirect sources include emissions from electricity consumption, water demand, and solid waste generation. Project-related GHG emissions were quantified with CalEEMod, which relies upon vehicle trip rates and Project-specific land use data to calculate emissions.

Operational emissions generated by the proposed Project at full buildout (i.e., 2027) are used to indicate the total amount of GHG emissions for on-going operational emissions. Emissions will be generated when Phase 1 and Phase 2 of the Project become operational. Prior to mitigation, Phase 1 GHG emissions will commence when Phase 1 becomes operational and are estimated to be 17,296.43 MT CO_2e per year. Phase 1 and Phase 2 combined emissions are estimated to be 58,708.70 MT CO_2e per year beginning in 2025 when Phase 2 is completed and becomes operational. The emissions sources from Phase 1 and Phase 2 are the same as for full buildout at Phase 3. The same project design features and individual mitigation measures will be implemented for Phase 1 and Phase 2 operations as each is built and occupied as shown for Phase 3. Because total emissions are lower in Phase 1 and Phase 2 than in total buildout in Phase 3 which becomes operational in 2027, reporting emissions from the Project at full buildout is more conservative since the Project at full buildout would result in more total emissions than either Phase 1 or Phase 2 alone or combined. As such, the analysis conservatively reports emissions totals associated with the Project.

Annual GHG emissions were calculated for operation of the Project under Project Buildout scenario (Year 2027) as shown in DEIR Table 4.8-4, *2027 Project Buildout GHG Emissions*. The Project will result in a total of approximately 63,911.07 $MTCO_2e$ per year, without mitigation. The Project operational phase emissions are from operation of the proposed land use, off-road equipment used for daily operations, and from Project-related vehicle trips. The primary source of Project-related emissions would be from mobile-source emissions generated from the Project- related mobile source (79%). The next largest sources of emissions would be from energy usage (12%) followed by waste (5%). Project Buildout GHG emissions would exceed the 3,000 $MTCO_2e$ per year threshold; therefore, the Project would generate greenhouse gas emissions that may have a significant impact on the environment. Impacts related to GHG emissions are considered significant. (DEIR pp. 4.8-34 to 4.8-36).

The Project would be required to implement Air Quality Mitigation Measures MM 4.3-3 through MM 4.3-17, listed above which also serve to reduce GHG emissions, and MM 4.8-1 and MM 4.8-2, as follows:

MM 4.8-1 Prior to issuance of building permits, the Project shall provide documentation to the City as part of the plan check process, demonstrating that the Project will implement measures identified the Riverside County Greenhouse Gas Emissions Screening Tables, 2019 up to a minimum of 1,850 points. The Project may also achieve equivalent emission reductions from other measures approved by the City. Implementing these mitigation measures shall be verified by the City prior to the issuance of final Certificate of Occupancy.

MM 4.8-2 The Project shall prohibit the use of natural gas in the industrial and warehouse components of the Project within Planning Areas 4 through 8, which shall be verified during plan check.

Mitigation Measures MM 4.3-3 through 4.3-17, MM 4.8-1 and MM 4.8-2 reduce emissions attributable to the proposed project for both air quality and GHG emissions. However, most of the measures cannot be quantified due to some uncertainty of the exact level of use or details needed to provide substantial evidence of reductions. As an example, the CalEEMod model does not provide reductions for the 60 EV charging systems and the TDM Program does not have enough detail to quantify at this time. Therefore, the Project GHG emissions with mitigation is a conservative forecast of GHG emissions.

As shown in DEIR Table 4.8-10, *2027 Project Buildout GHG Emissions with Mitigation*, the annual GHG emissions associated with the Project under Project Buildout scenario (Year 2027) with the implementation of mitigation measures are estimated to be approximately 60,638.09 MT CO_2e per year, which exceeds the 3,000 MT CO_2e per year threshold. At the time the DEIR was prepared, only four mitigation measures (MM 4.3-10, MM 4.8-1, MM 4.3-6, and MM 4.8-1) were quantified to provide a conservative analysis of emissions reductions. With the additional quantification of emissions reductions from project design features and mitigation measures described in the DEIR but not quantified and from quantification of the new measures (industrial portion of the Project will meet LEED-ready requirements, new recycling measures, an increase in number of EV charging stations for passenger cars from 60 to 175 as required by the updated CalGreen Building Code requirements, and MM 4.8-2), the Project would result in a total of approximately 53,404.80 $MTCO_2e$ per year and continue to result in a significant and unavoidable impact (Attachment A of the Supplemental CEQA Memorandum).

No additional feasible mitigation measures are available that can reduce impacts to less than significant. The Project incorporates all feasible mitigation measures that could be implemented to further reduce the Project's GHG emissions below the 3,000 $MTCO_2e$ threshold. There are no additional measures available that would further reduce emissions because the majority of the Project's emissions come from mobile sources which are regulated by the State and not the City.

The reliance on carbon offsets to reduce either the Project's mobile or non-mobile emissions is also not feasible; there is no local program available at this time that would meet CEQA's criteria for this to be a valid mitigation measure. To reduce emissions, purchased offset credits must be genuine, quantifiable, additional, and verifiable. Even offset credits purchased from CARB-approved offset project registries have been determined to not adequately assure that purchased offset credits accurately and reliably represent actual emissions reductions or cannot guarantee that such reductions are additional to any reduction that would occur under business-as-usual operations and reductions required by law. Such offsets have been determined to not comply with CEQA's definition of a valid mitigation measure. See *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467.

The City, as Lead Agency and the entity responsible for enforcing any mitigation measures incorporated into the Project and relied upon to reduce impacts to a less than significant level, has no

enforcement authority over offset credits that fund carbon reduction projects outside of the City. Many offset credits "sell" reductions in emissions generated outside of California, which may not be verifiable. International offsets may also be difficult to verify and guarantee. Notably, CARB does not have enforcement authority over such reductions, let alone the City. Thus, the purchase of offset credits is not a feasible mitigation measure to reduce the emissions impact of the proposed Project and impacts would remain significant and unavoidable. (DEIR pp. 4.8-60 to 4.8-61)

5.2.3 THRESHOLD B

Impact Statement: The Project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

❑ Findings

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.8.7 of the DEIR. The Project would not conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHG emissions. However, despite plan consistency, the Project's long-term operational GHG emissions would exceed the City's significance threshold of 3,000 $MTCO_2e$ per year. As such, a significant GHG impact would occur as a result of the proposed Project. The Project is required to comply with Mitigation Measures MM 4.3-3 through 4.3-17, MM 4.8-1 and MM 4.8-2, which would reduce impacts to the extent feasible, however, impacts would remain significant and unavoidable. Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described below, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives identified in the EIR.

❑ Substantial Evidence

As previously stated, pursuant to 15064.4 of the *CEQA Guidelines*, a lead agency may rely on qualitative analysis or performance-based standards such as complying with an applicable plan to determine the significance of impacts from GHG emissions. Plans adopted for the purpose of reducing GHG emissions are the City's CAP (Sustainable Beaumont), County of Riverside CAP, SCAG's Connect SoCal, and City and County General Plan policies related to GHG emissions. A consistency analysis with the City's and County of Riverside CAP along with the SCAG's Connect SoCal, City and County General Plan is shown in DEIR Tables 4.8-5 through 4.8-9. As shown in these tables, the Project would not conflict with the City approved Sustainable Beaumont: The City's Roadmap to Greenhouse Gas Reductions in 2015 (which has not been updated), the County of Riverside Climate Action Plan (CAP) (which does not apply to the Project after annexation into the City), SCAG's 2020-2045 RTP/SCS (Connect SoCal), the Riverside County General Plan policies related to the reduction of GHG emissions (which do not apply to the Project after annexation into the City), and the City's General Plan goals and policies related to reducing GHG emissions. (DEIR pp. 4.8-37 to 4.8-59)

A consistency analysis with the City's and County of Riverside CAP along with the SCAG's Connect SoCal, City and County General Plan is also presented below.

City of Beaumont CAP Consistency

The City approved Sustainable Beaumont: The City's Roadmap to Greenhouse Gas Reductions in 2015, which serves as a long-term plan to achieve sustainability in the City by reducing GHG emissions from existing and future development. Although it has expired, nevertheless, as shown in Table 4.8-5, *Applicability of Sustainable Beaumont Goals*, the Project would not conflict with the plan's goals. Accordingly, the Project would have a less than significant impact.

Table 4.8-5 Applicability of Sustainable Beaumont Goals

Sustainable Beaumont Goal	Applicability
Goal 1: Increase energy efficiency in existing residential units.	**Not Applicable.** The Project does not include existing residential land uses therefore this goal does not apply.
Goal 2: Increase energy efficiency in new residential development.	**Not Applicable.** The Project does not propose new residential land uses therefore this goal does not apply.
Goal 3: Increase energy efficiency in existing commercial units.	**Not Applicable.** The Project does not include any existing commercial development; therefore, this goal does not apply.
Goal 4: Increase energy efficiency in new commercial development.	**No Conflict.** The Project would comply with applicable provisions of the California Building Energy Efficiency Standards and applicable mitigation measures that would improve energy efficiency.
Goal 5: Increase energy efficiency through water efficiency.	**No Conflict.** The Project will incorporate low flow water fixtures and implement water reducing features (see DEIR Tables 3-2 and 4.8-6).
Goal 6: Decrease energy demand through reducing urban heat island effect.	**No Conflict.** The Project will incorporate light-colored building materials that would reduce heat reflection in accordance with the Section 140.3(a) of the California Building Code.
Goal 7: Decrease GHG emissions through reducing vehicle miles traveled.	**No Conflict.** The Project will incorporate a TDM program to reduce vehicle miles traveled, as required by Mitigation Measure MM 4.3-6.
Goal 8: Decrease GHG emissions through reducing solid waste generation.	**No Conflict.** The Project will comply with AB 939 which requires diversion of a minimum of 50% of solid waste from landfills.

Sustainable Beaumont Goal	Applicability
Goal 9: Decrease GHG emissions through increasing clean energy use.	**No Conflict.** The Project will incorporate solar photovoltaic solar panels (see DEIR Table 4.8-6).
Goal 10: Decrease GHG emissions from new development through performance standards.	**No Conflict**. Although the City has not implemented a GHG screening table, the Project is consistent with and implements GHG screening tables that have been adopted by the County of Riverside.

Source: (Urban Crossroads, 2022d, Table 4-3)

County of Riverside CAP Consistency

The Project includes annexation into the City of Beaumont from the County of Riverside. Under the County of Riverside Climate Action Plan (CAP), projects that generate more than 3,000 MT CO_2e, can be determined to be consistent with the County's CAP if the projects implement a minimum of 100 points based on the County's CAP Screening Tables. The Screening Tables establishes a points system that assigns values for each GHG emissions mitigation design element or operational program feature incorporated into a given development project. For informational purposes, the Project is also shown to be consistent with the Riverside County CAP. As shown in Table 4.8-6, *CAP Screening Table for GHG Implementation Measures*, the Project originally would achieve a minimum of 581 points, which is significantly more than the required minimum of 100 points to determine consistency with the County's CAP. Mitigation Measure 4.8-1 was revised to require a minimum of 1,850 points. As such, the project would be consistent with the goals and objectives of the County's CAP which aims to reduce GHG emissions through design and operational controls.

Table 4.8-6 CAP Screening Table for GHG Implementation Measures

	Description	Points
EE10.A.1 Insulation	Enhanced Insulation (rigid wall insulation R-13, roof/attic R-38)	11
EE10.A.2 Windows	Greatly Enhanced Window Insulation (0.28 or less U-factor, 0.22 or less SHGC)	7
EE10-A.3 Cool Roofs	Modest Cool Roof (CRRC Rated 0.15 aged solar reflectance, 0.75 thermal emittance)	7
EE10.B.1 Heating/Cooling Distribution System	Distribution loss reduction with inspection (HERS Verified Duct Leakage or Equivalent)	8
EE10.B.2 Space Heating/Cooling Equipment	Improved Efficiency HVAC (EER 14/78% AFUE or 8 HSPF)	4
EE10B.4 Water Heaters	Improved Efficiency Water Heater (0.675 Energy Factor)	8
EE10.B.6 Artificial Lighting	Efficient Lights (25% of in-unit fixtures considered high efficiency. High efficiency is defined as 40 lumens/watt for 15 watt or less fixtures, 50 lumens/watt for 15-40 watt fixtures, 60 lumens/watt for fixtures >40 watt)	5

	Description	Points
EE10.B.7 Appliances	Energy Star Commercial Refrigerator and Commercial Dishwasher	4
E1B.1 Photovoltaic	Solar Photovoltaic panels or wind installed on buildings or in collective arrangements such that the total power provided augments: 20% of the power needs of the Project. e.g., 30%= 8 points, 40% = 12 points, 50% = 16 points, 60% = 19 points	19
W2.D.1 Water Efficient Landscaping	Only low water using plants	3
W2.D.2 Water Efficient Irrigation Systems	Weather based irrigation control systems combined with drip irrigation (demonstrate 20% reduced water)	3
W2.E.1 Toilets	Water Efficient Showerheads (2.0 gpm)	2
W2.E.2 Toilets	Water Efficient Toilets/Urinals (1.5 gpm)	3
W2.E.3 Faucets	Water Efficient faucets (1.28 gpm)	2
W2.E.4 Faucets	Water Efficient dishwasher (20% water savings)	2
W2.F.1 Recycled Water	Graywater (purple pipe) irrigation system on site	5
	Car/vanpool program with preferred parking	2
T3.A.3 Employee Bicycle/Pedestrian Programs	Bike lockers and secure racks Showers and changing facilities	3
T1.F.1 Parking	Provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles.	1
T4.B.1 Electric Vehicle (EV) Recharging	Install EV charging stations in garages/parking areas	480[a]
S1.B.1 Recycling	Provide separated recycling bins within each building/floor and provide large external recycling collection bins at central location for collection trash pick-up.	2
	Total Points	**581**
	Minimum Target	**100**

Source: (Urban Crossroads, 2022d, Table 4-1)

[a] The Project is anticipated to include 60 EV charging stations. Per the Screening Tables, each station is 8 points.

SCAG's 2020–2045 RTC/SCS (Connect SoCal)

The 2020-2045 RTP/SCS, developed with input from local governments, including the City of Beaumont, establishes GHG emissions goals for automobiles and light-duty trucks for 2035, 2045 and establishes an overall GHG target for the region that is consistent with the statewide GHG-reduction targets for the post-2020 statewide GHG reduction goals. The 2020-2045 RTP/SCS links appropriate land use planning with the goal of improving the efficiency of the region's network to serve the mobility needs of goods and people. The RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve state GHG emission reduction goals and federal

Clean Air Act requirements, support the vital goods movement industry, and use resources more efficiently.

Table 4.8-7, *SCAG Connect SoCal Applicability Analysis*, provides an evaluation of the of the Project consistency with the 2020-2045 RTP/SCS goals. Additionally, while VMT associated with heavy duty trucks involved in goods movement is generally outside the realm of the RTP/SCS, which primarily focuses on VMT associated with passenger vehicles, the 2020-2045 RTP/SCS includes the following goods-movement strategies that could benefit the Project from a regional and macro-scale level:

- **Clean Freight Corridor System/East-West Freight Corridor.** Establishing a freight corridor system to connect the San Pedro Ports and industrial cluster areas in Los Angeles and the Inland Empire.

- **Truck Bottleneck Relief Strategy.** Working to relieve the top 57 truck bottlenecks. Examples of bottleneck relief strategies include ramp metering, extension of merging lanes, ramp and interchange improvements, capacity improvements and auxiliary lane additions.

- **Truck Climbing Lanes.** Installing dedicated truck climbing lanes along key corridors, such as Interstate 10 (I-10), I-15, State Route 60 (SR-60), to enable other vehicles to move at a faster pace, thereby reducing congestion.

Table 4.8-7 SCAG Connect SoCal Applicability Analysis

Connect SoCal Goal Number	Goal Statement	Applicability
1	Encourage regional economic prosperity and global competitiveness.	**No Conflict.** This policy would be implemented by cities and the counties within the SCAG region as part of comprehensive local and regional planning efforts. The City of Beaumont is identified as one of the priority growth areas for job centers in the region under the Connect SoCal Plan. The Project Applicant proposes to develop the Project site with industrial and commercial buildings that are designed to meet contemporary industry standards and operational characteristics, that can accommodate a wide variety of users and are economically competitive with similar industrial buildings in the local area and region. The Project would assist the City to meet its economic goal for fiscal strength and stability through business investment and employment generation. New job opportunities generated by the Project would improve the jobs to housing balance within the City (see DEIR Section 4.14, Population and Housing). Accordingly, the Project would not impede the economic development in the City of Beaumont or the region.
2	Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict.** The Project site is located approximately 12.4 miles east of March Air Reserve Base/Inland Port (MARB/IP). As such,

Connect SoCal Goal Number	Goal Statement	Applicability
		development of the site with the Project would efficiently facilitate the movement of goods. Additionally, the Project is located at the western edge of the City of Beaumont and is situated astride the regional transportation network which connects the Ports of Long Beach and Los Angeles, both major gateways for international trade, to the Inland Empire and the Western United States. The Project is along the south side of the SR-60 and access to the regional transportation system is provided from Potrero Boulevard and 4th Street. SR-60 also provides access to Interstate 10 (I-10), which is located approximately 2.0 miles north of the Project site, and I-215, which is located approximately 14.6 miles west of the Project site. Due to the Project site's proximity to SR-60, trucks accessing the Project site would efficiently reach the State highway system to facilitate the movement of goods throughout the region.
3	Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict.** This policy would be implemented by cities and the counties within the SCAG region as part of the overall planning and maintenance of the regional transportation system. Additionally, this policy provides guidance to City staff to monitor the transportation network and to continue to coordinate with other agencies as appropriate. The implementation of the Project would have no adverse effect on such planning or maintenance efforts.
4	Increase person and goods movement and travel choices within the transportation system.	**No Conflict.** The Project involves the development of a contemporary industrial park that abuts a developing industrial area along a regional transportation network (SR-60, I-10 and I-79). The Project would generate approximately 5,456 permanent jobs. By providing job opportunities in a housing-rich area and industrial uses in close proximity to the regional transportation network; the Project increases person, goods movement, and travel choices within the transportation system.
5	Reduce greenhouse gas emissions and improve air quality.	**No Conflict.** An analysis of the Project's environmental impacts is provided throughout this EIR and mitigation measures are specified where warranted. Air quality impacts are addressed in DEIR Section 4.3, *Air Quality*. Impacts would be reduced to the maximum extent feasible through the implementation of Mitigation Measures and Project Design Features, which limit truck idling, provide incentives for using clean engines and equipment, require installation of conduit for EV truck charging stations, electric indoor material handling equipment and off-road equipment, preferential parking for fuel-efficient and carpool/van vehicles, EV charging stations.

Connect SoCal Goal Number	Goal Statement	Applicability
		Additionally, as discussed herein, the Project would incorporate measures related to building design, landscaping, and energy systems to promote the efficient use of energy. The Project would be consistent with the County of Riverside CAP requirement by achieving a minimum of 1,850 points, which is significantly more than the required minimum of 100 points to determine consistency. Furthermore, as demonstrated in Table 4.8-5 of the Draft EIR, the Project would not conflict with the City's Sustainable Beaumont: The City's Roadmap to Greenhouse Gas Reductions, which serves as a long-term plan to achieve sustainability in the City by reducing GHG emissions from existing and future development. Although the Project would exceed the City's GHG significance threshold of 3,000 $MTCO_2e$ per year, all feasible mitigation measures have been included to reduce GHG impacts. Specifically, Mitigation Measures 4.3-3 through 4.3-13 relating to air quality would also reduce GHG impacts and Mitigation Measure 4.8-1 requires verification that the Project would achieve a minimum of 1,850 points from the County CAP Screening Table for GHG Implementation Measures. Moreover, the City of Beaumont is identified as one of the priority growth areas for job centers in the region under the Connect SoCal Plan. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced, thereby reducing greenhouse gas emissions and improving air quality.
7	Adapt to changing climate and support an integrated regional development pattern and transportation network.	**No Conflict.** Connect SoCal indicates that since the adoption of the 2016 RTP/SCS, there have been significant drivers of change in the goods movement industry including emerging and new technologies, more complex supply chain strategies, evolving consumer demands and shifts in trade policies. E-commerce continues to be one of the most influential factors shaping goods movement. As previously identified, the Project involves the development of a Project site, historically vacant and undeveloped, with industrial and commercial buildings that would diversity the City's economy and bring employment opportunities closer to the local workforce. Co-locating jobs near housing improves the jobs to housing balance within the City and reduces greenhouse gas emissions caused by long commutes and contributes to integrated development patterns. Further, the Project site is located adjacent to an area surrounded by industrial development in the City, which is in close proximity to key freeway infrastructure (e.g., I-215, SR-60, I-10, etc.), thereby reducing travel distances. Development of the Project in western Riverside County, also would shorten the distance that goods need to travel between a logistics facility to their final destinations ("last mile" transit times).

Connect SoCal Goal Number	Goal Statement	Applicability
8	Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**No Conflict.** Connect SoCal indicates that the advancement of automation is expected to have considerable impacts throughout regional supply chains. Notably, warehouses, such as those proposed with the Project, are increasingly integrating automation to improve operational efficiencies in response to the surge in direct-to-consumer e-commerce. Additionally, continued developments and demonstrations of automated truck technologies will alter the goods movement environment with far-reaching impacts ranging from employment to highway safety. The Project would meet contemporary industry standards and operational characteristics relative to transportation technologies and data-driven solutions.
9	Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict.** The implementation of the Project would result in the development of the Project site with industrial, commercial, and open space/conservation uses. Implementation of the Project would not interfere with the City's ability to encourage the development of diverse housing types that are supported by multiple transportation options in other parts of the City, as appropriate.
10	Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict.** The Project site is in a rural yet developing area of the City of Beaumont. The Project site contains natural lands and contains suitable habitat for native wildlife or plant species. In general, the Project site's natural lands are in the northwestern and southeastern portions, while development would occur in the northeast portion of the site. The Project Applicant proposes to designate 263.5 acres as Open Space and Open Space-Conservation (PAs 9 and 10), including the Project's northwestern and southeastern portions. These areas would remain undeveloped. Additionally, the Project site does not support agricultural uses. Therefore, implementation of the Project would not interfere with the City's ability to promote the conservation of natural and agricultural lands and the restoration of habitats.

Implementing SCAG's RTP/SCS will help reduce the regional GHG emissions from transportation, thus helping to achieve statewide emission reduction targets. As shown, the Project would be consistent with and would not conflict with the stated goals of the RTP/SCS; therefore, the proposed Project would not interfere with SCAG's ability to achieve the region's year post-2020 mobile source GHG reduction targets outlined in the RTP/SCS.

County of Riverside General Plan

The Riverside County General Plan has many policies that help reduce GHG emissions. Policies that indirectly contribute to reducing GHG emissions include Land Use strategies for improving air quality by emphasizing alternative transportation options for communities, energy conservation, reduce automobile use, and more. GHG reduction programs and measures listed in the CAP also support and help most of these General Plan policies. Table 4.8-8, *County of Riverside General Plan Applicability Analysis*, provides an analysis of the Project's consistency with County of Riverside General Plan goals and policies related to reducing GHG emissions. As shown in Table 4.8-8, the Project would not result in any inconsistency with the applicable County General Plan goals and policies, even though they would not be applicable after annexation. Accordingly, the Project would have a less than significant impact.

Table 4.8-8 County of Riverside General Plan Applicability Analysis

General Plan Policy	Applicability
Land Use	
LU 2.1 Accommodate land use development in accordance with the patterns and distribution of use and density depicted on the General Plan Land Use Map (Figure LU-1) and the Area Plan Land Use Maps, in accordance with the following: a. Provide a land use mix at the countywide and area plan levels based on projected need and supported by evaluation of impacts to the environment, economy, infrastructure, and services. b. Accommodate a range of community types and character, from agricultural and rural enclaves to urban and suburban communities. c. Provide for a broad range of land uses, intensities, and densities, including a range of residential, commercial, business, industry, open space, recreation, and public facilities uses. d. Concentrate growth near community centers that provide a mixture of commercial, employment, entertainment, recreation, civic, and cultural uses to the greatest extent possible. e. Concentrate growth near or within existing urban and suburban areas to maintain the rural and open space character of Riverside County to the greatest extent possible. f. Site development to capitalize upon multi-modal transportation opportunities and promote compatible land use arrangements that reduce reliance on the automobile.	**No Conflict.** The Project would require a General Plan Amendment and therefore the Project would not be consistent with the County's General Plan Land Use Plan and Area Plan Land Use Maps. However, the Project would provide a broad range of land uses and accommodate land use development in accordance with policies (a–g). Specifically, the Project would provide a broad range of land uses on the Project site. The Project would allow for the development on the Project site of a maximum of 246,000 square feet (sf) of general commercial uses in addition to a 125-room hotel (90,000 sf) and a maximum of 4,995,000 sf of industrial uses. The Project would provide 124.7 acres of open space to accommodate landscaped manufactured slopes, fuel modification areas, and natural open space as a buffer to adjacent conservation area and 152.4 acres of open space – conservation. The Project would concentrate employment growth near entertainment in a housing-rich community adjacent to SR-60 and the City of Beaumont's Interstate Employment Subarea. This subarea will be developed with industrial and commercial land uses. Therefore, the Project would not conflict with General Plan Policy LU 2.1.

General Plan Policy	Applicability
g. Prevent inappropriate development in areas that are environmentally sensitive or subject to severe natural hazards.	
LU 4.1 Require that new developments be located and designed to visually enhance, not degrade the character of the surrounding area through consideration of the following concepts: e. Pursue energy efficiency through street configuration, building orientation, and landscaping to capitalize on shading and facilitate solar energy, as provided for in Title 24 Part 6 and/or Part 11, of the California Code of Regulations (CCR). f. Incorporate water conservation techniques, such as groundwater recharge basins, use of porous pavement, drought tolerant landscaping, and water recycling, as appropriate. j. Provide safe and convenient vehicular access and reciprocal access between adjacent commercial uses. p. Require that new development be designed to provide adequate space for pedestrian connectivity and access, recreational trails, vehicular access and parking, supporting functions, open space, and other pertinent elements. r. Site buildings access points along sidewalks, pedestrian areas, and bicycle routes, and include amenities that encourage pedestrian activity.	**No Conflict.** The Beaumont Pointe Specific Plan provides an industrial/commercial business park that capitalizes on the property's location south of SR-60. The Project would complement the existing and planned land uses in this portion the City of Beaumont. The Project site is within the northwestern portion of the City's SOI and is bordered to the east by land designated for industrial and commercial uses. The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other industrial projects of similar scale and configuration. As discussed in DEIR Section 4.19, *Utilities and Service Systems*, the Project would construct an on-site recycled water system. The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street. The Project also includes a detailed circulation plan, which is organized to ensure efficient access to individual tenant areas, as well as to public places. Therefore, the Project would not conflict with General Plan Policy LU 4.1.
LU 8.12 Improve the relationship and ratio between jobs and housing so that residents have an opportunity to live and work within the county.	**No Conflict.** The Project would generate a substantial number of jobs that would be filled by residents of the City and surrounding communities in the County. The Project would provide opportunities for positive economic benefit to the City and County. The Project would create new job opportunities within the City of Beaumont which improves the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances. Refer also to DEIR Section 4.14, Population and Housing. Therefore, the Project would not conflict with General Plan Policy LU 8.12.
LU 11.1 Provide sufficient commercial and industrial development opportunities in order to increase local	**No Conflict.** As discussed previously, the Project would allow for the development on the Project site of a maximum of 246,000 square feet (sf) of general

General Plan Policy	Applicability
employment levels and thereby minimize long-distance commuting.	commercial uses in addition to a 125-room hotel (90,000 sf) and a maximum of 4,995,000 sf of industrial uses, which would create a substantial number of jobs that would be filled by residents of the City and surrounding communities in the County. The Project would accommodate a wide variety of users, and would be economically competitive with similar industrial buildings in the local area and region. Therefore, the Project would not conflict with General Plan Policy LU 11.1.
LU 11.3 Accommodate the development of community centers and concentrations of development to reduce reliance on the automobile and help improve air quality.	**No Conflict.** The Project site is in proximity to SR-60 and the City of Beaumont's Interstate Employment Subarea, which will be developed with industrial and commercial land uses. Due to the Project site's proximity to SR-60, trucks accessing the Project site would efficiently reach the State highway system to facilitate the movement of goods throughout the region. Therefore, the Project would not conflict with General Plan Policy LU 11.3.
LU 11.4 Provide options to the automobile in communities, such as transit, bicycle and pedestrian trails, to help improve air quality.	**No Conflict.** The Project includes installation of sidewalks along the Project site's frontage with Jack Rabbit Trail and 4th Street and along Industrial Way, a proposed private road located along the north side of the proposed industrial buildings. The Project Applicant proposes curb adjacent sidewalks and pedestrian paths to encourage and enhance pedestrian activity throughout the Project site. Additionally, the Project would include the installation of bicycle racks and lockers at each of the proposed light industrial buildings. Therefore, the Project would not conflict with General Plan Policy LU 11.4.
LU 11.5 Ensure that all new developments reduce Greenhouse Gas emissions as prescribed in the Air Quality Element and Climate Action Plan.	**No Conflict.** As discussed in DEIR Table 4.8-6, the Project would be consistent with the County's CAP requirement to achieve at least 100 points and thus the Project is considered to have a less than significant individual and cumulatively considerable impact on GHG emissions. Therefore, the Project would not conflict with General Plan Policy LU 11.5.
Circulation	
C 5.2 Encourage the use of drought-tolerant native plants and the use of recycled water for roadway landscaping.	**No Conflict.** As shown on DEIR Figure 3-14, *Master Landscape Plan*, the Project provides a plant palette for three categories: Entrance Planting, Native California Planting, and Industrial Screen Planting; and selected to complement and enhance the setting of the site, while ensuring the conservation of the site's natural vegetation

General Plan Policy	Applicability
	and habitats. Alternative plant species may be used provided that they are drought-tolerant and complement the Project's design theme. As disused in DEIR Section 4.19, *Utilities and Service Systems*, the Project would construct an on-site recycled water system. The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street. Therefore, the Project would not conflict with General Plan Policy C 5.2.
Multipurpose Open Space	
OS 1.4 Promote the use of recycled water for landscape irrigation.	**No Conflict.** As disused in DEIR Section 4.19, *Utilities and Service Systems*, the Project would construct an on-site recycled water system. The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street. Therefore, the Project would not conflict with General Plan Policy OS 1.4.
OS 16.1 Continue to implement Title 24 of the California Code of Regulations (the "California Building Standards Code") particularly Part 6 (the California Energy Code) and Part 11 (the California Green Building Standards Code), as amended and adopted pursuant to County ordinance. Establish mechanisms and incentives to encourage architects and builders to exceed the energy efficiency standards of within CCR Title 24.	**No Conflict.** Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). The Project would comply with Title 24 of the California Code of Regulations and proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other industrial projects of similar scale and configuration. Therefore, the Project would not conflict with General Plan Policy OS 16.1.
OS 16.2 Specify energy efficient materials and systems, including shade design technologies, for county buildings	**No Conflict.** As discussed in DEIR Table 4.8-6, the Project shall implement the County of Riverside's 2019 Climate Action Plan (CAP) Screening Table Measures which include cool roofs, enhanced insulation, and energy efficient heating/cooling equipment. Additionally, as shown on DEIR Figure 3-14, *Master Landscape Plan*, streetscape landscaping presents a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers. Therefore, the

General Plan Policy	Applicability
	Project would not conflict with General Plan Policy OS 16.2.
OS 16.8 Promote coordination of new public facilities with mass transit service and other alternative transportation services, including bicycles, and design structures to enhance mass transit, bicycle, and pedestrian use.	**No Conflict.** The Project includes installation of sidewalks along the Project site's frontage with Jack Rabbit Trail and 4th Street and along Industrial Way, a proposed private road located along the north side of the proposed industrial buildings. The Project Applicant proposes curb adjacent sidewalks and pedestrian paths to encourage and enhance pedestrian activity throughout the Project site. Additionally, the Project would include the installation of bicycle racks and lockers at each of the proposed light industrial buildings. Therefore, the Project would not conflict with General Plan Policy OS 16.8.
OS 16.9 Encourage increased use of passive, solar design and day-lighting in existing and new structures.	**No Conflict.** As discussed in DEIR Table 4.8-6, the Project shall implement the County of Riverside's 2019 Climate Action Plan (CAP) Screening Table Measures which include cool roofs, enhanced insulation, and energy efficient heating/cooling equipment. Additionally, 20% of the Project's energy consumption would be from solar consistent with the CAP requirement. Furthermore, the Project's architecture would include skylights and clerestory windows to allow for increased use of passive solar design and day-lighted in new structures. Therefore, the Project would not conflict with General Plan Policy OS 16.9.
Air Quality	
AQ 4.1 Require the use of all feasible building materials/methods which reduce emissions.	**No Conflict.** During the Project's construction phase, water would be sprayed throughout the site to abate dust particulate emissions. Air quality impacts are address in DEIR Section 4.3, *Air Quality*. Impacts would be reduced to the maximum extent feasible through the implementation of Mitigation Measures 4.3-2 through 4.3-9, which limit truck idling, provide incentives for using clean engines and equipment, require installation of conduit for EV truck charging stations, electric indoor material handling equipment and off-road equipment, preferential parking for fuel-efficient and carpool/van vehicles, EV charging stations. Additionally, the Project is consistent with the CAP requirement that 20% of the Project's energy consumption would be from solar. As such, the Project would not conflict with General Plan Policy AQ 4.1.
AQ 4.2 Require the use of all feasible efficient heating equipment and other appliances, such as water heaters,	**No Conflict.** As discussed in DEIR Table 4.8-6, the Project would include the use of energy efficient

General Plan Policy	Applicability
swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units.	heating/cooling equipment, water heaters, and appliances. As such, the Project would not conflict with General Plan Policy AQ 4.2.
AQ 4.6 Require stationary air pollution sources to comply with applicable air district rules and control measures.	**No Conflict.** As discussed in DEIR Section 4.3, *Air Quality*, the Project would comply with applicable air district rules and control measures to reduce operational air quality emissions. All feasible mitigation measure has been incorporated to reduce air quality impacts to the extent feasible. Therefore, the Project would not conflict with General Plan Policy AQ 4.6.
AQ 5.1 Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.	**No Conflict.** The Project would be required to coordinate with Waste Management, Inc. to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including AB 341, Mandatory Commercial Recycling, and the California Solid Waste Reuse and Recycling Act of 1991. Therefore, the Project would not conflict with General Plan Policy AQ 5.1.
AQ 5.4 Encourage the incorporation of energy-efficient design elements, including appropriate site orientation and the use of shade and windbreak trees to reduce fuel consumption for heating and cooling.	**No Conflict.** As discussed in DEIR Table 4.8-6, the Project shall implement the County of Riverside's 2019 Climate Action Plan (CAP) Screening Table Measures which include cool roofs, enhanced insulation, and energy efficient heating/cooling equipment. Additionally, as shown on Figure 3-14, *Master Landscape Plan*, streetscape landscaping presents a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers. Therefore, the Project would not conflict with General Plan Policy AQ 5.4.
AQ 8.6 Encourage employment centers in close proximity to residential uses.	**No Conflict.** The Project would generate a substantial number of jobs that would be filled by residents of the City and surrounding communities in the County. The land to the north of the Project site, on the opposite side of SR-60 is designated for residential uses. The Project would create new job opportunities within the City of Beaumont which improves the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances. Therefore, the Project would not conflict with General Plan Policy AQ 8.6.
AQ 8.8 Promote land use patterns which reduce the number and length of motor vehicle trips.	**No Conflict.** The Project site is situated in close proximity to the regional transportation network which connects the site to the Ports of Long Beach and Los Angeles, both major gateways for international trade,

General Plan Policy	Applicability
	the Inland Empire and the Western United States. Located along the south side of the SR-60 Freeway, access to the regional transportation system from the site is provided via 4th Street, and access to the SR-60 Freeway from 4th Street is provided at the Potrero Boulevard interchange, approximately 1.25 miles to the east. Due to the Project site's proximity to SR-60, trucks accessing the Project site would efficiently reach the State highway system to facilitate the movement of goods throughout the region. Therefore, the Project would not conflict with General Plan Policy AQ 8.8.
AQ 8.9 Promote land use patterns that promote alternative modes of travel.	**No Conflict.** The Project includes installation of sidewalks along the Project site's frontage with Jack Rabbit Trail and 4th Street and along Industrial Way, a proposed private road located along the north side of the proposed industrial buildings. The Project Applicant proposes curb adjacent sidewalks and pedestrian paths to encourage and enhance pedestrian activity throughout the Project site. Additionally, the Project would include the installation of bicycle racks and lockers at each of the proposed light industrial buildings. Therefore, the Project would not conflict with General Plan Policy AQ 8.9.
AQ 20.3 Reduce VMT and GHG emissions by improving circulation network efficiency.	**No Conflict.** As discussed in DEIR Section 4.17, *Transportation*, Transportation demand management (TDM) strategies have been evaluated for reducing VMT impacts. The Project also includes a detailed circulation plan, which is organized to ensure efficient access to individual tenant areas, as well as to public places. The Project would locate industrial uses adjacent to SR-60, a regional transportation network which connects the Ports of Long Beach and Los Angeles, both major gateways for international trade, to the Inland Empire and the Western United States; thereby improving goods movement circulation efficiency. As demonstrated herein, impacts related to GHG emissions are less than significant. Therefore, the Project would not conflict with General Plan Policy AQ 20.3.
AQ 20.6 Reduce emissions from commercial vehicles, through VMT, by requiring all new commercial buildings, in excess of 162,000 square feet, to install circuits and provide capacity for electric vehicle charging stations.	**No Conflict.** As shown in DEIR Table 4.8-6, the Project would provide a total of 15 electric vehicle charging stations and electric conduit for truck charging. Therefore, the Project would not conflict with General Plan Policy AQ 20.6.

General Plan Policy	Applicability
AQ 20.7 Reduce VMT through increased densities in urban centers and encouraging emphasis on mixed use to provide residential, commercial and employment opportunities in closer proximity to each other. Such measures will also support achieving the appropriate jobs-housing balance within the communities.	**No Conflict.** The Project would provide employment opportunities within close proximity to residential uses. The Project would create new job opportunities within the City of Beaumont which improves the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances. Therefore, the Project would not conflict with General Plan Policy AQ 20.7.
AQ 20.10 Reduce energy consumption of the new developments (residential, commercial and industrial) through efficient site design that takes into consideration solar orientation and shading, as well as passive solar design.	**No Conflict.** As discussed in DEIR Table 4.8-6, the Project shall implement the County of Riverside's 2019 Climate Action Plan (CAP) Screening Table Measures which include cool roofs to reduce energy consumption. Additionally, 20% of the Project's energy consumption would be from solar consistent with the CAP requirement. Additionally, as shown on Figure 3-14, *Master Landscape Plan*, streetscape landscaping presents a combination of evergreen and deciduous trees, low shrubs, and masses of groundcovers to provide adequate shading. Therefore, the Project would not conflict with General Plan Policy AQ 20.10.
AQ 20.11 Increase energy efficiency of the new developments through efficient use of utilities (water, electricity, natural gas) and infrastructure design. Also, increase energy efficiency through use of energy efficient mechanical systems and equipment.	**No Conflict.** As discussed in DEIR Table 4.8-6, the Project shall implement the County of Riverside's 2019 Climate Action Plan (CAP) Screening Table Measures which include energy efficient heating/cooling system, water heaters, appliances, water efficient irrigation systems, and recycle water. Therefore, the Project would not conflict with General Plan Policy AQ 20.11.
AQ 20.13 Reduce water use and wastewater generation in both new and existing housing, commercial and industrial uses. Encourage increased efficiency of water use for agricultural activities.	**No Conflict.** As disused in DEIR Section 4.19, *Utilities and Service Systems*, the Project would construct an on-site recycled water system. The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street. Therefore, the Project would not conflict with General Plan Policy AQ 20.13.
AQ 20.14 Reduce the amount of water used for landscaping irrigation through implementation of County Ordinance 859 and increase use of non-potable water.	**No Conflict.** As shown in DEIR Table 4.8-6, the Project would include water efficient landscaping. Additionally, as disused in Section 4.19, *Utilities and Service Systems*, the Project would construct an on-site recycled water system. Therefore, the Project would not conflict with General Plan Policy AQ 20.14.
AQ 20.17 Protect vegetation from increased fire risks associated with drought conditions to ensure biological	**No Conflict.** As discussed in DEIR Section 4.20, *Wildfire*, the Project would implement on-site

General Plan Policy	Applicability
carbon remains sequestered in vegetation and not released to the atmosphere through wildfires.	defensible space (FMA and fuel maintenance zone), which would consist of asphalt roadways, parking stalls, loading zones, irrigated landscaping, and irrigated slope protecting landscaping to preclude wildfire impacts. Therefore, the Project would not conflict with General Plan Policy AQ 20.17.

City of Beaumont General Plan

Table 4.8-9, *City of Beaumont General Plan Applicability Analysis*, provides an analysis of the Project's consistency with the City's General Plan goals and policies related to reducing GHG emissions. As shown in Table 4.8-9, the Project would not result in any inconsistency with the applicable General Plan goals and policies. Impacts regarding the Project's consistency with applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHG emissions and generation of GHG emissions were determined to be less than significant. However, despite plan consistency, the Project's long-term operational GHG emissions would exceed the City's significance threshold of 3,000 $MTCO_2e$ per year, even after implementation of all feasible mitigation measures. As such, the Project's GHG emission impacts would be significant.

Table 4.8-9 City of Beaumont General Plan Applicability Analysis

General Plan Policy	Applicability
Land Use and Community Design (Chapter 3)	
Goal 3.1: A City structure that enhances the quality of life of residents, meets the community's vision for the future, and connects new growth areas together with established Beaumont neighborhoods.	
Policy 3.1.12: Establish buffers between open space areas and urban development by encouraging less intensive rural development within proximity to the open space areas.	**No Conflict.** The Project site is bordered to the west and to the south by open space and conservation land uses. The Specific Plan designates PA 9 for Open Space, which accommodates landscaped, manufactured slopes, fuel modification areas, project signage, as well as the natural slopes which form a buffer between the Specific Plan's developed areas and the Open Space – Conservation in PA 10. These areas would not be developed with the Project's proposed structures. Some disturbance would occur within the areas designated as Open Space; however, the disturbance would be limited to grading and landscaping. Therefore, the Project would establish a buffer between open space areas and urban development and would not conflict with General Plan Policy 3.1.12.
Goal 3.7: A City with a high-quality pedestrian environment for people, fostering interaction, activity, and safety	
Policy 3.7.2: Create pedestrian-oriented streetscapes by establishing unified street tree planting, sidewalk dimensions and maintenance, pedestrian amenities, and high-quality building frontages in all new development.	**No Conflict.** Passive recreational opportunities are provided to employees and visitors of Project site through curb-adjacent sidewalks and pedestrian paths. These amenities encourage and enhance pedestrian activity throughout the Project. Provisions for sidewalks and pedestrian walkways, bicycle storage facilities, and employee and visitor gathering areas interior to the planning areas are set forth in Chapter 4, Design Guidelines, of the Specific Plan. The Project includes installation of sidewalks along the Project site's frontage with Jack Rabbit Trail and 4th Street and along Industrial Way. The Project provides a plant palette for three categories: Entrance Planting, Native California Planting, and Industrial Screen Planting. Landscaping is selected to complement and enhance the setting of the site, while ensuring the conservation of the site's natural vegetation and habitats. Therefore, the Project would create pedestrian-oriented streetscapes by establishing unified street tree planting, sidewalks, and high-quality building frontages. As such, the Project would not conflict with General Plan Policy 3.7.2.
Goal 3.8: A City that encourages a healthy lifestyle for people of all ages, income levels, and cultural backgrounds.	

General Plan Policy	Applicability
Policy 3.8.3 Ensure the design of context-specific streetscaping that promotes safe travel for all users, including signs, curbs, trees and landscaping to provide a more pleasant environment for drivers, cyclists, and pedestrians.	**No Conflict.** The Project Applicant proposes curb adjacent sidewalks and pedestrian paths to encourage and enhance pedestrian activity throughout the Project site. In addition, all driveways and intersections to and from the Project site would be stop-controlled to ensure safety for all transportation users. Based on the Project's roadway improvements, the Project would not conflict with General Plan Policy 3.8.3.
Mobility (Chapter 4)	
Goal 4.1: Promote smooth traffic flows and balance operational efficiency, technological, and economic feasibility.	
Policy 4.1.5: Require residential and commercial development standards that strengthen connections to transit and promote walking to neighborhood services.	**No Conflict.** The Project Applicant proposes curb adjacent sidewalks and pedestrian paths to encourage and enhance pedestrian activity throughout the Project site. Additionally, the Project would provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities to the east along 4th Street. Therefore, the Project would not conflict with General Plan Policy 4.1.5.
Goal 4.3: A healthy transportation system that promotes and improves pedestrian, bicycle, and vehicle safety in Beaumont.	
Policy 4.3.5: Integrate land use and transportation infrastructure to support higher-density development, a balanced mix of residential and commercial uses, and a connected system of sidewalks, bikeways, greenways, and transit.	**No Conflict.** The Project involves a mixed development of 232.6 acres of light industrial use, 30.2 acres of commercial use (i.e., hotel, restaurants, recreation-based retail uses), 124.7 acres of open space, and 152.4 acres of open space - conservation use. The Project also includes a detailed circulation plan, which is organized to ensure efficient access to individual tenant areas, as well as to public places. Because the Project would integrate land use and transportation infrastructure to support a balanced mix of land uses, the Project would not conflict with Policy 4.3.5.
Goal 4.4: A balanced transportation system that provides adequate facilities for people in the City to bicycle, walk, or take transit to their destinations.	
Policy 4.4.3: Improve safety for all active transportation users.	**No Conflict.** The Project Applicant proposes curb adjacent sidewalks and pedestrian paths to encourage and enhance pedestrian activity throughout the Project site. In addition, all driveways and intersections to and from the Project site would be stop-controlled to ensure safety for all transportation users. Based on the Project's roadway improvements, the Project would not conflict with General Plan Policy 4.4.3.
Health and Environmental Justice (Chapter 6)	

General Plan Policy	Applicability
Policy 6.7.2: Continue to work with State, federal, regional, and local agencies to eliminate and reduce concentrations of regulated legacy pollutants.	**No Conflict.** There are no existing pollutants on site as the Project site is vacant and undeveloped. The Project would comply with State and federal Community-Right-to-Know laws, which allow the public to access information regarding the information about the amounts and types of chemicals that may be used by businesses on the Project site. Therefore, the Project would not conflict with General Plan Policy 6.7.2.
Policy 6.7.5: Reduce particulate emissions from paved and unpaved roads, construction activities, and agricultural operations.	**No Conflict.** During the Project's construction phase, water would be sprayed throughout the site to abate dust particulate emissions. Additionally, Mitigation Measure MM 4.3-2 shall ensure that all 50-horsepower or greater diesel-powered equipment is powered with California Air Resources Board (CARB)-certified Tier 4 Final engines, except where the project applicant establishes to the satisfaction of the City of Beaumont that Tier 4 Final equipment is not available. Therefore, the Project would not conflict with General Plan Policy 6.7.5.
Community Facilities and Infrastructure (Chapter 7)	
Goal 7.3: Buildings and landscapes promote water conservation, efficiency, and the increased use of recycled water.	
Policy 7.3.6: Encourage innovative water recycling techniques, such as rainwater capture, use of cisterns, and installation of greywater systems.	**No Conflict.** As disused in DEIR Section 4.19, *Utilities and Service Systems*, and Section 4.8, *Greenhouse Gas Emissions*, the Project would commit to using graywater (purple pipe) irrigation Recycled water will be utilized and used for construction dewatering, irrigation of manufactured and replanted slopes within PA 9, as well as for irrigation of parkway landscaping and irrigation of landscaping within the General Commercial and Industrial land uses (PAs 1-8). The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street (350 feet east of the Project site in the existing right of way). As such, the Project would not conflict with General Plan Policy 7.3.6.
Goal 7.6: A zero-waste program that increases recycling and reduces waste sent to the landfill.	

General Plan Policy	Applicability
Policy 7.6.1: Encourage new construction and additions to avoid "Red List" materials and chemicals.[10]	**No Conflict.** Refer to General Plan Policy 6.7.1. As concluded in DEIR Section 4.9, Hazards and Hazardous Materials, construction contractors would be required to comply with all applicable federal, State, and local laws and regulations regarding the transport, use, and storage of hazardous construction-related materials, including but not limited requirements imposed by the EPA and DTSC. With mandatory compliance of applicable hazardous materials regulations, the Project would not create significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials during the construction phase. The Project Applicant proposes to develop the Project site with industrial and commercial uses. Based on the facilities and uses that would be allowed at the Project site, hazardous materials (e.g., diesel fuel, lubricants, solvents, corrosives, toxic substances hazardous materials, etc.) could be used during the course of daily operations at the Project site. As concluded in DEIR Section 4.9, with mandatory regulatory compliance, the Project would not pose a significant hazard to the public or the environment through the routine transport, use, storage, emission, or disposal of hazardous materials, nor would the Project increase the potential for accident conditions which could result in the release of hazardous materials into the environment. Therefore, the Project would not conflict with General Plan Policy 7.6.1.
Goal 7.7: Provide for a clean and healthy community through an effective solid waste collection and disposal system.	
Policy 7.7.3: Require businesses (including public entities) that generate four cubic yards or more of commercial solid waste per week, or a multifamily residential dwelling of five units or more, to arrange for recycling services.	**No Conflict.** The Project would be required to coordinate with Waste Management, Inc. to develop a collection program for recyclables, such as paper, plastics, glass, and aluminum, in accordance with local and State programs, including AB 341, *Mandatory Commercial Recycling, and the California Solid Waste Reuse and Recycling Act of 1991*. Therefore, the Project would not conflict with General Plan Policy 7.7.3.
Conservation and Open Space (Chapter 8)	
Goal 8.1: A City with green buildings and developments that promote energy efficiency.	
Policy 8.1.5: Encourage new development to reduce building energy use by adopting	**No Conflict.** As discussed in DEIR Section 3.0, *Project Description*, the Project shall implement the County of

[10] The "Red List" includes the worst types of materials and chemicals used in the building industry that are harmful to humans and the environment. For a list of material included on the "Red List," see: https://living-future.org/declare/declare-about/red-list/

General Plan Policy	Applicability
passive solar techniques and heat island reduction strategies: • Maximizing interior daylighting • Using cool exterior siding, cool roofing, and paving materials with relatively high solar reflectivity to reduce solar heat gain • Planting shade trees on south- and west-facing sides of new buildings to reduce energy load • Installing water efficient vegetative cover and planting, substantial tree canopy coverage	Riverside's 2019 Climate Action Plan (CAP) Screening Table Measures which include 20% project energy generated from solar, cool roofs and water efficient landscaping. The Project would achieve a minimum of 201 Screening Table Points. Additionally, the Project would include skylights and clearstory windows to maximize day lighting. Therefore, the Project would not conflict with General Plan Policy 8.1.5.
Policy 8.1.7: Encourage new buildings and buildings undergoing major retrofits to exceed Title 24 energy efficiency standards.	**No Conflict.** Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). The Project proposes conventional industrial and commercial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would comply with current Title 24 energy efficiency standards and due to the continued upgrades to Title 24 standards new construction would be comparable to, or less than, other industrial projects of similar scale and configuration in terms of energy use. Compliance with the Riverside County CAP provides additional energy efficiencies that exceed Title 24. Therefore, the Project would not conflict with General Plan Policy 8.1.7.
Safety (Chapter 9)	
Goal 9.10: A City that is prepared for the potential impacts of climate change.	
Policy 9.10.2: Encourage new development and redesign of existing buildings to take steps to reduce the impacts of extreme heat events, including: • Design buildings to use less mechanical heating and cooling through use of passive solar techniques.	**No Conflict.** As discussed in DEIR Section 3.0, *Project Description*, the Project shall implement the County of Riverside's 2019 Climate Action Plan (CAP) Screening Table Measures which include cool roofs, enhanced insulation, and energy efficient heating/cooling equipment, and on-site solar to provide 20% of the Project's energy requirements. Additionally, as shown on DEIR Figure 3-14, *Master Landscape Plan*, streetscape landscaping presents a combination of evergreen and deciduous trees, low shrubs, and masses of

General Plan Policy	Applicability
• Support and incentivize, as feasible, energy efficiency and weatherization programs. • Protect and expand the City's urban tree canopy to provide shade, increase carbon sequestration, and purify the air. • Provide shade structures in public parks, outdoor playgrounds, and bus shelters.	groundcovers. Therefore, the Project would not conflict with General Plan Policy 9.10.2.
Policy 9.10.3: Require enhanced water conservation measures in new development and redesign of existing buildings to address the possibility of constrained future water supplies, including: • Compliance with existing landscape water conservation ordinance (Chapter 17.06 of the Municipal Code). • Use of water conservation measures in new development beyond current requirements. • Installation of recycled water use and graywater systems.	**No Conflict.** As discussed in DEIR Section 4.19, *Utilities and Service Systems*, the Project would construct an on-site recycled water system. The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street. The Project will comply with CAP points for increased efficient use of water both inside the building and for landscaping irrigation. Additionally, the Project would be required to comply with Chapter 17.06 of the Municipal Code. Therefore, the Project would not conflict with General Plan Policy 9.10.3.
Land Use (Chapter 11)	
Goal 11.12: Encourage development to be efficient in the use of non-renewable resources, including water, energy, and air quality.	
Policy 11.12.1: Promote the use of energy and water conservation technologies and practices. Policy 11.12.3: Consider sustainable development practices that reduce energy and water demand.	**No Conflict.** The Project proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Energy efficiency/energy conservation attributes of the Project would be complemented by increasingly stringent State and federal regulatory actions addressing vehicle fuel economies and vehicle emissions standards; and enhanced building/utilities energy efficiencies mandated under California building codes (e.g., Title 24, California Green Building Standards Code). The Project would comply with Title 24 of the California Code of Regulations and proposes conventional industrial uses reflecting contemporary energy efficient/energy conserving designs and operational programs. Uses proposed by the Project are not inherently energy intensive, and the Project energy demands in total would be comparable to, or less than, other industrial projects of similar scale and configuration.

General Plan Policy	Applicability
	As discussed in DEIR Section 4.19, Utilities and Service Systems, the Project would construct an on-site recycled water system. The Project would connect a proposed 14-inch recycled water line that would connect to the existing 14-inch recycled water line within the adjacent Hidden Canyon development at 4th Street. Therefore, the Project would not conflict with General Plan Policies 1.12.1 and 11.12.3.
Policy 11.12.4: Ensure that new development does not result in wind and solar access impacts.	**No Conflict.** As shown in DEIR Table 4.8-6, 20% of the Project's energy consumption would be from solar consistent with the CAP requirement. Furthermore, the Project's architecture would include skylights and clerestory windows to allow for increased use of passive solar design and day-lighted in new structures. Therefore, the Project would not conflict with General Plan Policy 11.12.4.
Policy 11.12.6: Improve air quality through improved walkability, reduced vehicular use and enhanced non- vehicular travel.	**No Conflict.** The Project includes installation of sidewalks along the Project site's frontage with Jack Rabbit Trail and 4th Street and along Industrial Way, a proposed private road located along the north side of the proposed industrial buildings. The Project Applicant proposes curb adjacent sidewalks and pedestrian paths to encourage and enhance pedestrian activity throughout the Project site. Additionally, the Project would include the installation of bicycle racks and lockers at each of the proposed light industrial buildings. Therefore, the Project would not conflict with General Plan Policy 11.12.6.

The Project would be required to implement Mitigation Measures MM 4.3-3 through MM 4.3-17 and MM 4.8-1, above. As discussed under Section 5.2.2, above, even with incorporation of all feasible mitigation measures, impacts would exceed the applicable 3,000 MT CO_2e threshold of significance and remain significant and unavoidable.

5.2.4 CUMULATIVE IMPACTS

Impact Statement: The Project would result in a cumulatively considerable impact related to GHG emissions.

- ❑ **Findings**

Potential cumulative impacts of the Project related to GHG emissions are discussed in detail in Section 4.8.8 of the DEIR. CEQA Guidelines Section 15130(f), clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Sections 5.2.2 and 5.2.3, above). Because GHG impacts would exceed the applicable 3,000 MT CO_2e threshold of significance, project impacts are cumulatively considerable under CEQA Guidelines Section 15130(f). The Project would not conflict with plans, policies, and regulations adopted for the purpose of reducing the emissions of GHG emissions. However, despite plan

consistency, the Project's long-term operational GHG emissions would exceed the City's significance threshold of 3,000 $MTCO_2e$ per year. As such, a significant impact would occur as a result of the proposed Project. The Project is required to comply with Mitigation Measures MM 4.3-3 through 4.3-17 and MM 4.8-1, which would reduce impacts to the extent feasible, however, impacts would remain significant and unavoidable.

Several mitigation measures were recommended by commenters on the DEIR. These measures were evaluated in the FEIR and were: 1) already required through regulatory requirements, project design features, or mitigation; 2) added as mitigation and included, herein; or 3) determined to be infeasible. For example, due to the reasons described under Section 5.1.1 "Substantial Evidence" above, the requirement that all heavy-duty vehicles must be zero emission was found to be economically and technologically infeasible because they are not commercially available for the foreseeable future. Additionally, regulations that control heavy-duty truck emissions are the responsibility of the State and outside of the responsibility and control of the City. Therefore, pursuant to Section 21081(a)(3) of the California Public Resources Code, control of tailpipe emissions are within the responsibility and jurisdiction of another public agency and have been adopted by that other agency. See FEIR, Response to Comments B-34 through B-63 and D-4 through D-29.

Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described below, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR.

- **Substantial Evidence**

Implementation of a development project could contribute to global climate change through direct emissions of GHGs from on-site area sources and vehicle trips generated by the project, and indirectly through off-site energy production required for on-site activities, water use, and waste disposal. Because no single project is large enough to result in a measurable increase in global concentrations of GHG emissions, climate change impacts of a project are considered on a cumulative basis consistent with the requirements outlined in CEQA Guidelines Section 15064(h)(3). As discussed, incorporation of mitigation would contribute to minimizing emissions. However, implementation of the Project would still result in net annual emissions that exceed the GHG emissions significance threshold of 3,000 $MTCO_2e$/yr. Therefore, Project-related GHG emissions and their contribution to global climate change would be cumulatively considerable, and GHG emissions impacts would be significant. (DEIR p. 4.8-59)

5.3 NOISE

5.3.1 THRESHOLD A

Impact Statement: The Project would generate a substantial permanent increase in ambient noise levels from off-site traffic-related noise in the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

❑ Findings

Potential impacts of the Project related to Threshold a are discussed in detail in Section 4.13.7 of the DEIR. The Project's incremental noise level represents the difference between the Existing (baseline) conditions and the Existing plus Project Buildout conditions. The Project would result in a significant impact from off-site traffic-related noise at four roadway segments (#1, #4, #5, and #6) due to the added Project traffic. Therefore, the Project-related off-site traffic noise level increases at adjacent noise-sensitive land uses are considered a significant impact. Both rubberized asphalt and off-site noise barriers are considered as potential noise mitigation measures to reduce the potentially significant off-site traffic noise level increases. However, due the reasons outlined below neither form of mitigation is recommended for implementation since they would not eliminate or substantially lessen the off-site traffic noise level increases at the adjacent land uses to the impacted roadway segments. No feasible mitigation measures exist to reduce Project traffic noise impacts. Impacts would remain significant and unavoidable. Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described below, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the EIR.

❑ Substantial Evidence

Operational Noise Impact Analysis – Off-Site Traffic Noise

To evaluate off-site noise increases that could result from Project-related traffic, noise levels were modeled for the following scenarios:

- Existing (2020) plus Project Conditions
  - Existing plus Project (Phase 1)
  - Existing plus Project (Phase 1 + 2)
  - Existing plus Project (Project Buildout)
- Opening Year Conditions
  - Opening Year (2023)
    - Without Project
    - With Project (Phase 1)
  - Opening Year (2025)
    - Without Project
    - With Project (Phase 1 + 2)
  - Opening Year (2027)
    - Without Project
    - With Project (Project Buildout)
- Horizon Year (2045) Conditions
  - Without Project
  - With Project

The Project would result in a significant impact from operational traffic noise during Existing (2020) plus Project conditions, Opening Year (2023 and 2027) plus Project Conditions, and Horizon Year (2045) Plus Project Conditions for three roadway segments (#4, #5, and #6, listed below). Additionally,

during Existing (2020) plus Project conditions, the Project would result in a significant impact for roadway segment #1. Under Opening Year (2025) plus Project Conditions, the Project would result in a significant impact for one roadway segment (segment #6). Project off-site traffic noise level ranges for each of the scenarios is provided in DEIR Tables 4.13-15 to 4.13-21.

DEIR Table 4.13-22, *Off-Site Traffic Incremental Noise Level Increase Summary*, presents a summary of the cumulative and project incremental noise level increases presented in Table 4.13-15 to Table 4.13-21 for each of the six-study area roadway segments by traffic condition. As shown, four of the following study area roadway segments are shown to experience potentially significant off-site traffic noise level increases due to the added Project traffic. Therefore, the Project's contribution to off-site traffic noise would result in a substantial permanent increase in ambient noise levels and Project-related impacts on the following road segments would be significant:

- Potrero Boulevard south of Oak Valley Parkway (Segment #1).
    - Project Increment Increase of 1.6 dBA, which is over the threshold of 1.0 dBA.
- 4th Street east of Potrero Boulevard. (Segment #4).
    - Project Increment of 5.8 dBA, which is over the threshold of 1.0 dBA
- 4th Street east of Veile Avenue (Segment #5).
    - Project Increment of 6.5 dBA, which is over the threshold of 1.0 dBA
- 4th Street west of Potrero Boulevard. (Segment #6).
    - Project Increment of 21.2 dBA, which is over the threshold of 0.0 dBA (DEIR pp. 4.13-29 to 4.13-34)

As analyzed in DEIR Sections 4.13.10 and 4.13.11 and further discussed below, no feasible mitigation measures exist to reduce Project traffic noise impacts during Existing (2020) plus Project conditions, Opening Year (2023 and 2027) plus Project Conditions, and Horizon Year (2045) Plus Project Conditions for three roadway segments (#4, #5, and #6); and under Opening Year (2025) plus Project Conditions, for one roadway segment (segment #6).

Significant off-site traffic noise level increases identified under Existing Conditions do not have the potential to occur, since the Project will not be fully developed and occupied under existing conditions, but rather under future conditions. Additionally, Segments #4, #5, and #6 are located in industrial areas and are not located immediately adjacent to any noise sensitive land uses. This is consistent with the City's General Plan EIR that determined that buildout of the City's General Plan could result in new vehicular traffic which could exceed the FHWA thresholds and could substantially increase the ambient noise levels in the City and its SOI. The City's General Plan recognizes that an increase in noise levels will occur in industrial areas due to truck traffic. The City's General Plan goals and policies, therefore, are focused on protecting noise sensitive receptors from road noise, while encouraging timely and efficient goods movement that does not significantly contribute to noise in the City. The Project is located adjacent to the SR-60, which is identified as a Truck Priority roadway in General Plan Figure 4.9, and truck trips would be routed through an industrial area to Potrero Boulevard.

The City incorporated a number of General Plan policies and implementation programs to reduce traffic-related noise impacts, including the following polices: 10.1.2 (enforce noise standards), 10.1.3 (protect noise sensitive uses), 10.1.4 (require noise mitigation in the design of new development), 10.1.5 (require new development to implement measures to normally compatible range), 10.1.8 (promote effective enforcement of federal, State, and City noise standards), 10.2.1 (work with Caltrans and FHA), 10.2.2 (enforce speed limits to reduce noise and enforce truck and bus routes), 10.2.3 (prohibit truck routes through neighborhoods with sensitive receptors), 10.2.4 (reduce roadway noise), 10.2.5 (traffic calming measures), 10.2.6 (encourage noise-reducing paving materials), and 10.2.7 (reduce noise generated from City-owned vehicles). Applicable implementation actions include: N2 (requirement for acoustical studies) and N5 (traffic noise assessments). Compliance with the City's General Plan policies and implementation actions would reduce impacts to the extent feasible but would remain significant and unavoidable. (DEIR, pp. 4.13-39 to 4.13-40)

Rubberized Asphalt

Due to the potential noise attenuation benefits, rubberized asphalt is considered as a mitigation measure for the off-site Project-related traffic noise level increases. To reduce traffic noise levels at the noise source, Caltrans research has shown that rubberized asphalt can provide noise attenuation of approximately 4 dBA for automobile traffic noise levels. Changing the pavement type of a roadway has been shown to reduce the amount of tire/pavement noise produced at the source under both near-term and long-term conditions. Traffic noise is generated primarily by the interaction of the tires and pavement, the engine, and exhaust systems. For automobiles noise, as much as 75 to 90% of traffic noise is generated by the interaction of the tires and pavement, especially when traveling at higher and constant speeds. According to research conducted by Caltrans and the Canadian Ministry of Transportation and Highways a 4 dBA reduction in tire/pavement noise is attainable using rubberized asphalt under typical operating conditions.

The effectiveness of reducing traffic noise levels is higher on roadways with low percentages of heavy trucks, since the heavy truck engine and exhaust noise is not affected by rubberized alternative pavement due to the truck engine and exhaust stack height above the pavement itself. Per Caltrans guidance, a truck stack height is modeled using a height of 11.5 feet above the road. With the primary off-site traffic noise source consisting of heavy trucks with a stack height of 11.5 feet off the ground, the tire/pavement noise reduction benefits associated rubberized asphalt will be primarily limited to autos.

While the off-site Project-related traffic noise level increases would theoretically be reduced with the 4 dBA reduction provided by rubberized asphalt, the reduction would not provide reliable benefits for the noise levels generated by heavy truck traffic. This, as previously stated, is due to the noise source height difference between automobiles and trucks. While rubberized asphalt will provide some noise reduction, this noise study recognizes that this is only effective for tire-on-pavement noise at higher speeds and would not reduce truck-related off-site traffic noise levels associated with truck engine and exhaust stacks to less than significant levels. Since the use of rubberized asphalt would not substantially lessen off-site traffic noise levels, rubberized asphalt is not proposed as mitigation for the Project and

the off-site Project-related traffic noise level increases at adjacent land uses under Existing Conditions would remain significant. (DEIR, p. 4.13-40)

Off-Site Noise Barriers

Since existing and future noise-sensitive receiving land uses are located adjacent to the impacted roadway segments in the Project study area, off-site noise barriers were considered in this analysis as a potential traffic noise mitigation measure to reduce the impacts. Off-site noise barriers are estimated to provide a *readily perceptible* 5 dBA reduction which, according to the FHWA, is *simple* to attain when blocking the line-of-sight from the noise source to the receiver. As previously discussed, Caltrans guidance in the Highway Design Manual, Section 1102.3(3), indicates that for design purposes, *the noise barrier should intercept the line of sight from the exhaust stack of a truck to the receptor,* and an 11.5-foot-high truck stack height is assumed to represent the truck engine and exhaust noise source. Therefore, any exterior noise barriers at receiving noise sensitive land uses experiencing Project-related traffic noise level increases would need to be high enough and long enough to block the line-of-sight from the noise source (at 11.5 feet high per Caltrans) to the receiver (at 5 feet high per FHWA guidance) in order to provide a 5 dBA reduction per FHWA guidance. Installation of a wall would be infeasible because it would require: 1) installation of a minimum 11.5-foot wall approximately 2.75 miles along 4th Street (from the eastern project boundary to Veile Avenue) and approximately 0.25 miles along Potrero (from SR-60 to 4th Street); 2) permission from multiple landowners would need to be obtained; 3) a wall is currently constructed along Potrero from Oak Valley Parkway to SR-60; 4) installation of a wall would block views; and 5) there are no sensitive receptors along 4th Street or Potrero south of SR-60. Furthermore, the wall would not block traffic-related noise where gaps would be required for curb cuts and vehicle access.

As such, off-site noise barriers would not be feasible and would not lower the off-site traffic noise levels below a level of significance, and therefore, noise barriers are not proposed as mitigation for the Project. (DEIR, p. 4.13-41)

Summary

Both rubberized asphalt and off-site noise barriers are considered as potential noise mitigation measures to reduce the potentially significant off-site traffic noise level increases. However, due the reasons outlined above neither form of mitigation is recommended for implementation since they would not substantially lessen or eliminate the off-site traffic noise level increases at the adjacent land uses to the impacted roadway segments. Therefore, Project-related off-site traffic noise level increases are considered significant and unavoidable under Project-level and cumulative conditions. (DEIR, p. 4.13-41)

5.3.2 CUMULATIVE IMPACTS

Impact Statement: The Project would generate a substantial permanent increase in ambient noise levels from off-site traffic-related noise in the vicinity of the Project in excess of standards under cumulative conditions, as detailed in Section 5.3.1, above.

❑ Findings

Potential cumulative impacts of the Project related to noise are discussed in detail in Section 4.13.8 of the DEIR. The Project would result in a significant impact from off-site traffic-related noise at four roadway segments (#1, #4, #5, and #6). Therefore, off-site traffic noise level increases at adjacent noise-sensitive land uses are considered a significant impact. No feasible mitigation measures exist to reduce or eliminate Project traffic noise impact and impacts would remain significant and unavoidable. Specific economic, legal, social, technological, or other considerations, make infeasible the mitigation measures or project alternatives identified in the EIR.

❑ Substantial Evidence

The traffic-related noise analysis contained in the Noise Impact Analysis (DEIR *Technical Appendix J*) for Opening Year (2023, 2025, 2027) and Horizon Year (2045) was based upon the Project's Traffic Impact Analysis (DEIR *Technical Appendix K1*) which considers impacts based on the addition of related projects as well as ambient growth. The percentage of ambient growth and cumulative development traffic applied to each cumulative scenario is detailed in Section 4.7 of the Traffic Analysis Report (DEIR *Technical Appendix K1*). As shown in DEIR Table 4.13-22, the Project's traffic-related noise impacts would be significant for four roadway segments: #1 (Potrero Boulevard south of Oak Valley Parkway); #4 (4th Street east of Potrero Boulevard); #5 (4th Street east of Veile Avenue); and #6 (4th Street west of Potrero Boulevard). Therefore, the Project's traffic-related noise impacts along study area roadway segments would be cumulatively considerable and result in a significant cumulative impact.

5.4 TRANSPORTATION

5.4.1 THRESHOLD B

Impact Statement: The Project would conflict with CEQA Guidelines Section 15064.3, subdivision (b).

❑ Findings

Potential impacts of the Project related to Threshold b are discussed in detail in Section 4.17.7 of the DEIR. The Project would result in a significant VMT impact. The Project is required to comply with Mitigation Measure MM 4.17-1, which would reduce impacts to the extent feasible; however, impacts would remain significant and unavoidable. The City finds that the above mitigation measures are feasible, are adopted, and will reduce some of the proposed Project transportation impacts attributable to trips generated by the proposed Project. However, since implementation and effectiveness of TDM measures will vary according to the tenants which are unknown at this time, the extent and effectiveness of mitigation cannot be determined. The significance determination is based on a conservative worst-case scenario whereby it is assumed that effectiveness of VMT mitigation and project design features cannot be guaranteed based on research to date and therefore, the impacts are significant and unavoidable.

Pursuant to Section 21081(a)(3) of the California Public Resources Code the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures and alternatives identified in the EIR.

- **Substantial Evidence**

Since the Project does not meet any of the Project Type, Low VMT, or Transit Priority Area (TPA) screening criteria, a Project level VMT analysis was prepared to determine the Project impacts on VMT. Consistent with City VMT Guidelines, Project generated VMT includes all vehicle trips that are traced to the Project's transportation analysis zone. In addition, since the proposed Project also contains a significant amount of industrial land use, a calculation of Project VMT related to heavy-trucks has also been provided for informational purposes. The Project would result in a significant project generated VMT impact if the following condition is met:

- Baseline project generated VMT per service population (SP) exceeds 3% below the City of Beaumont current average VMT per service population. The City's current average VMT per service population is 27.87.

DEIR Table 4.17-2, *Project VMT per SP Comparison*, shows the Project Baseline VMT per SP compared to the City's adopted impact threshold. As shown, the Project's baseline VMT per SP is 39.19, which would exceed the City's current VMT per service population by 45%. As such, the Project's VMT impact is potentially significant. (DEIR, pp. 4.17-14 to 4.17-16)

As described in DEIR Section 4.17.10, Transportation demand management (TDM) strategies have been evaluated for reducing VMT impacts that were determined to be potentially significant. The effectiveness of TDM strategies to reduce VMT has been determined based on the SB 743 Implementation TDM Strategy Assessment (Fehr & Peers, 2019) ("WRCOG Report") prepared for WRCOG and the Quantifying Greenhouse Gas Mitigation Measures (CAPCOA, 2010). In addition to specific tenancy considerations, which may affect the effectiveness of TDM measures, land use context is a major factor relevant to the potential application and effectiveness of TDM measures. More specifically, the land use context of the Project is characteristically suburban. The analysis provided by WRCOG shows that a rural to suburban community like Beaumont without a well-developed transportation system is unlikely to achieve anywhere near a 15% reduction in VMT regardless of project-specific mitigation. The Project's suburban context acts to reduce the range of feasible TDM measures and moderates their potential effectiveness. Relevant discussion in this regard is presented in the following excerpt from the WRCOG Report:

> *The Technical Advisory relies on the Quantifying Greenhouse Gas Mitigation Measures, (CAPCOA) 2010 resource document to help justify the 15 percent reduction in VMT threshold stating, " . . . fifteen percent reduction in VMT are achievable at the project level in a variety of place types . . . ". A more accurate reading of the CAPCOA document is that a fifteen percent is the maximum reduction when combining multiple mitigation strategies for the suburban center place type. For suburban place types 10 percent is the maximum and requires a project to contain a diverse land use mix,*

> *workforce housing, and project-specific transit. It is also important to note that the maximum percent reductions were not based on data or research comparing the actual performance of VMT reduction strategies in these place types. Instead, the percentages were derived from a limited comparison of aggregate citywide VMT performance for Sebastopol, San Rafael, and San Mateo where VMT performance ranged from 0 to 17 percent below the statewide VMT/capita average based on data collected prior to 2002. Little evidence exists about the long-term performance of similar TDM strategies in different land use contexts. As such, VMT reductions from TDM strategies cannot be guaranteed in most cases* (Fehr & Peers, 2019, pp. 65-66).

Even under the most favorable circumstances, projects located within a suburban context, such as the proposed Project evaluated here, can realize a maximum 10% reduction in VMT through implementation of feasible TDM measures. This could result in reduction from 39.19 to 35.27 VMT per SP which would still exceed of the jurisdiction's current average VMT per SP threshold of 27.03 by 30.5%.

Given the City's rural/suburban land use context, the following TDM measures were identified as the most appropriate and incorporated into Mitigation Measure MM 4.17-1, below.

- Diversifying land use;
- Improving pedestrian networks;
- Implementing traffic calming infrastructure;
- Building low-street bicycle network improvements;
- Encouraging telecommuting and alternative work schedules; and
- Providing ride-share programs.

Consistent with VMT reduction measures described within CAPCOA and further evaluated within the WRCOG Report and City's VMT Guidelines, reductions to VMT shall include the strategies identified in Mitigation Measure MM 4.17-1. In addition to Mitigation Measure MM 4.17-1, the Project would provide pedestrian and bicycle network improvements within the development connecting to existing off-site facilities to the east along 4th Street. Additionally, Section 3.6, Energy Efficiency Development Criteria, of the Specific Plan includes the following TDM measures: car/vanpool program with preferred parking; bike lockers and secure bike racks; preferential parking spaces for car-share, carpool; and installation of electric vehicle charging stations (see DEIR pp. 3-18 to 3-19).

MM 4.17-1 Prior to the issuance of building permits, the Project Applicant shall incorporate the TDM measures identified below. Verification that the TDM measures completed shall be verified by the City's Public Works Director.

a. Where applicable ensure design of key intersections and roadways encourage the use of walking, biking and, where applicable, transit.

b. Collaborate with the Riverside Transit Authority (RTA) to determine the feasibility of providing new or re-route existing transit services to the site.

c. Commute trip reduction (CTR) programs offered to encourage the use of biking.

d. Encourage CTR programs may also provide for alternative work or compressed work schedules to reduce the number of days an employee commutes to work.

Project components and mitigation measures available to reduce VMT include: developing pedestrian network improvements, providing design features that encourage people to walk or bike instead of drive, implementing TDM measures such as those listed in Mitigation Measure MM 4.17-1, car/vanpool program with preferred parking; bike lockers and secure bike racks; preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles; and installation of electric vehicle charging stations. Various design features are included in the Project to encourage pedestrian and bicycle activity (sidewalks and bicycle parking). Encouraging businesses to allow telecommuting and alternative work week hours and to use ridesharing programs also can reduce VMT, but the City has no jurisdictional authority to mandate the businesses practices of private enterprises. Additionally, while these measures would reduce VMT, there is no means to quantify any VMT reductions that could result, and even if VMT reductions could be quantified, it likely would not reduce impacts to less than significant.

It is also recognized that as the Project area and surrounding communities develop as envisioned under the City's General Plan (Beaumont 2040 Plan), new residential, retail, and industrial development would be implemented. These actions could collectively alter transportation patterns, improve the region's jobs/housing ratio, reduce VMT, and support implementation of new or alternative TDM measures. Additionally, the effectiveness of some of the TDM strategies that have potential to reduce the Project VMT are dependent on as yet unknown Project building tenant(s), which can change over time; and as noted above, "VMT reductions from TDM strategies cannot be guaranteed in most cases." Hence, relying on TDM programs tied to tenants would likely result in the need for on-going monitoring to verify performance Therefore, Project impacts related to VMT would be significant and unavoidable. (DEIR pp. 4.17-22 to 4.17-24)

5.4.2 CUMULATIVE IMPACTS

Impact Statement: The Project would result in a cumulative VMT impact since the Project was found to have a significant and unavoidable impact at the project level. The Project's baseline VMT per SP is 39.19, which would exceed the City's current VMT per service population by 45%.

- ❑ **Findings**

Potential cumulative impacts of the Project related to transportation are discussed in detail in Section 4.17.8 of the DEIR. The Project would result in a significant cumulative VMT impact. The Project is required to comply with Mitigation Measure MM 4.17-1, which would reduce impacts to the extent feasible; however, impacts would remain significant and unavoidable. The City finds that the above mitigation measures are feasible, are adopted, and will reduce some of the proposed Project transportation impacts attributable to trips generated by the proposed Project. However, since implementation and effectiveness of TDM measures will vary according to the tenants which are unknown at this time,

the extent and effectiveness of mitigation cannot be determined. The significance determination is based on a conservative worst-case scenario whereby it is assumed that effectiveness of VMT mitigation and project design features cannot be guaranteed based on research to date and therefore, the impacts are significant and unavoidable. Pursuant to Section 21081(a)(3) of the California Public Resources Code, as described below, the City has determined that specific economic, legal, social, technological, or other considerations make infeasible the alternatives and mitigation measures identified in the EIR.

- **Substantial Evidence**

OPR's Technical Advisory states that "a project that falls below an efficiency-based threshold (e.g., VMT per service population) that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less than significant project impact would imply a less than significant cumulative impact and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance." Since the Project was found to have a significant and unavoidable impact at the project level, it is also considered to be cumulatively considerable and therefore to have a significant cumulative impact. (DEIR p. 4.17-21)

The Project would be required to implement Mitigation Measure MM 4.17-1 to reduce VMT, including car/vanpool program with preferred parking; bike lockers and secure bike racks; preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles; and installation of electric vehicle charging stations. However, for the reasons set for in Section 5.4.1, even with implementation of all feasible mitigation measures, impacts would not be substantially lessened and would remain significant and unavoidable.

6.0 OTHER CEQA CONSIDERATIONS

6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The State CEQA Guidelines require EIRs to address any significant irreversible environmental changes that would be involved with the proposed action should it be implemented (CEQA Guidelines Section 15126.2[d]). An environmental change would fall into this category if: a) the project would involve a large commitment of non-renewable resources; b) the primary and secondary impacts of the project would generally commit future generations to similar uses; c) the project involves uses in which irreversible damage could result from environmental accidents associated with the project; or d) the proposed consumption of resources is not justified (e.g., the project results in the wasteful use of energy).

❑ Finding

The Project's potential to result in significant irreversible environmental changes are discussed in detail in Subsection 5.2 of the DEIR. Significant irreversible environmental changes have been identified, as described below. The Project would permanently alter the site by converting vacant and undeveloped property to urban uses, which would commit future generations to similar uses. Construction and long-term operation of the Project would require the commitment and reduction of nonrenewable and/or slowly renewable resources; however, nonrenewable resources are not expected to negatively impact the availability of these resources. As demonstrated in the analysis presented throughout the DEIR, implementation of the proposed Project would not result in significant and unavoidable environmental effects that cannot be feasibly reduced to below levels of significance, with the exception of significant and unavoidable impacts to air quality, greenhouse gas emissions, off-site traffic noise, and VMT impacts.

❑ Substantial Evidence

Determining whether the Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project site is currently and has historically been vacant and undeveloped, except for the eastern portion of the site that contains the paved portion of Jack Rabbit Trail. The Project would permanently alter the site by converting vacant and undeveloped property to urban uses, which would commit future generations to similar uses. This is a significant irreversible environmental change that would occur because of Project implementation.

Construction and long-term operation of the Project would require the commitment and reduction of nonrenewable and/or slowly renewable resources, including petroleum fuels and natural gas (for vehicle emissions, construction, lighting, heating, and cooling of structures) as well as lumber, sand/gravel, steel, copper, lead, and other metals (for use in building construction, piping, and roadway infrastructure). Other resources that are slow to renew and/or recover from environmental stressors would also be impacted by Project implementation, such as air quality (through the combustion of fossil fuels and production of greenhouse gases) and water supply (through the increased demands for potable water for drinking, cleaning, landscaping, and general maintenance needs). However, use of

nonrenewable resources is not expected to negatively impact the availability of these resources because there is adequate supply (DEIR Section 4.6, Energy). Additionally, the Project is required by law to comply with the California Green Building Standards Code (CALGreen), which will minimize the Project's demand for energy, including energy produced from non-renewable sources. Further, as indicated in DEIR Section 4.6, *Energy*, the Project would not result in the inefficient, wasteful, or unnecessary consumption of energy.

An increased commitment of public and utility services (e.g., police, fire, sewer, and water services) would also be required, as it is for all projects, although to less than significant extent. Project development is an irreversible commitment of the land and energy resources and building materials. After the 50- to 75-year structural lifespan of the building is reached, it is improbable that the site would revert to its current use due to the large capital investment that will already have been committed. (DEIR, p. 5-4)

6.2 GROWTH-INDUCING IMPACTS

CEQA requires a discussion of the ways in which the proposed Project could be growth inducing. The CEQA Guidelines identify a project as growth inducing if it would foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment (CEQA Guidelines Section15126.2[e)]).

❑ Finding

The Project's potential to result in growth-inducing impacts is discussed in detail in Subsection 5.3 of the DEIR. For the reasons described in detail below, the Project will not 1) remove obstacles to growth because the infrastructure on site is designed and sized to only serve the Project and would not extend beyond the Project site; 2) result in the need to expand one or more public services (see Section 4.15, Public Services, of the DEIR); 3) encourage or facilitate economic effects that could result in other activities that could significantly affect the environment because it would provide jobs in a housing-rich area and will improve the jobs -housing ratio and it is anticipated that workers would come from the City and nearby in the region; and 4) involve a precedent setting action that could encourage and facilitate other activities that could significantly affect the environment because the Project is limited to the Project site's boundaries and does not include any components that would indirectly affect existing or planned uses on neighboring properties . Additionally, Project development is occurring adjacent to an industrial corridor, as designated by the City. The development of the proposed commercial, industrial, and open uses on the Project site would not reasonably or foreseeably cause the redevelopment of other properties or cause development on other properties. Based on the entire record, the City finds that the Project would not directly or indirectly induce growth in the surrounding area which could result in a significant adverse effect to the environment.

- ❑ Substantial Evidence

Would this project remove obstacles to growth (e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area or through changes in existing regulations pertaining to land development)?

No. While the Project would require the construction and extension of roadways and utility infrastructure to serve the development (DEIR Figure 3-8, *Conceptual Circulation Plan*, shows the Project's proposed circulation and roadway sizes and classifications), the Project is located at the end of a cul-de-sac, no further adjacent development is likely to occur near it, and roadway infrastructure on site is designed and sized to serve only the Project. The Project would construct four main roadways for on-site circulation—4th Street, Jack Rabbit Trail, Entertainment Avenue, and Industrial Way, with access to the Project site from 4th Street, which would be constructed from Jack Rabbit Trail at the easterly edge of the Project site to provide a looped road system around the entire site. Since all proposed roadways would be constructed on site and for the exclusive purpose of serving the proposed development, the Project would not create major new infrastructure that could result in substantial, unplanned growth or remove obstacles to population growth or facilitate additional development.

The same assessment applies to utilities which are being extended to serve the Project. Water, reclaimed water, and sewer infrastructure is currently under construction to the center line of 4th Street 350 feet east of the eastern boundary of the Project site. As shown in DEIR Figures 3-9, 3-10, and 3-11, the proposed potable water, reclaimed water, and sewer system would connect to infrastructure lines from the Hidden Canyon Industrial Park project located immediately to the east to the Project to provide service to the Project site. The Project site is located at the end of a cul-de-sac and is surrounded by existing development to the east, the SR-60 to the north, and MSHCP conservation land to the west and to the south/southwest of the site, with rural mountainous lands directly to the south/southeast. Therefore, infrastructure would not extend beyond the Project site and would not induce population growth. Since all proposed utility infrastructure would connect to lines at the eastern edge of the Project site and would be sized to exclusively serve the proposed development, this Project infrastructure would not directly or indirectly remove obstacles to population growth or facilitate additional development.

Would this project result in the need to expand one or more public services to maintain desired levels of service?

No. The Project would not require the expansion of existing public service facilities either to serve the Project or maintain desired levels of service. Implementation of the Project would result in an increased requirement for fire and police protection services. However, considering the existing resources available, the Project is not expected to result in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impact. Development of the Project would not result in an increase in the population of the Project area and therefore would not increase the demand for schools, parks or libraries, which would require the construction of new or expanded public facilities. As such, implementation of the Project would not adversely affect other public facilities or require the construction of new or modified public facilities and no impact would

occur. If these facilities or associated resources do need to be expanded in the future to accommodate planned growth within the City, funding mechanisms are in place through existing regulations and standard practices to obtain funds from each new project in the City to contribute to future expansion which would enable to City to accommodate growth. This Project would not, therefore, have significant growth inducing consequences with respect to public services.

Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

No. A project could indirectly induce growth at the local level by increasing the demand for additional goods and services associated with the increase in project population and thus reducing or removing the barriers to further growth. This occurs in suburban or rural areas where population growth results from a project and causes an increased demand for services and commodity markets responding to the new population. This type of growth is, however, a regional phenomenon resulting from introduction of a major employment center or regionally significant housing project. For example, additional commercial uses may be drawn to the area by the increased number of residents in the area because of a project.

While economic growth is expected to take place as a result of Project implementation from construction jobs, visitors to the commercial uses, and employees generated by the Project, it is anticipated that they will be drawn from the City and nearby and will not result in unplanned population growth within the City. The Project's employees (short-term construction and long-term operational) and visitors would likely be from the region and purchase goods and services from the Project.

As shown in DEIR Table 4.14-1, the City's population and employment has grown steadily over the past decades. As discussed in Section 4.14, *Population and Housing*, by 2045, the City is anticipated to have a population of 80,200 residents according to SCAG's Connect SoCal and 131,949 by 2040 based on City's estimates. Similarly, SCAG forecasted 15,900 jobs in the City by the year 2045 and the City's General Plan forecasted 21,497 jobs within the City limits (exceeding SCAG forecasts) and 16,727 jobs within the SOI, totaling 38,224 jobs within the City and its SOI by 2040 (City of Beaumont, 2020b). The Project's proposed 5,456 total jobs were anticipated by the City's General Plan and represent approximately 33% of the anticipated jobs within the City's SOI and approximately 14% of the City's total job pool. Therefore, the Project's employment is within both SCAG and City growth forecasts and would contribute to a more balanced job-housing ratio (see DEIR Table 4.14-4). The Project, therefore, is not growth inducing.

The extent to which the new jobs created by a project are filled by existing residents makes a project not growth-inducing. Project construction would require temporary design, engineering, and construction-related jobs. It is anticipated that workers would come from the City and nearby in the region and would not relocate to the City. This would last until Project construction is completed. At

full-Project build out, the Project is estimated to generate approximately 5,456 permanent jobs.[11] Employees would come from within the City or the surrounding region because there is an imbalance of jobs and housing in Western Riverside County and the jobs that an industrial and commercial project in the region is likely to provide would be consistent with the job skills of residents in the area. For example, according to SCAG's Pre-Certified Local Housing Data, Beaumont has 19,385 workers living within its borders who work across 13 major industrial sectors. The most prevalent industry is Education & Social Services with 5,714 employees (29.5% of total) and the second most prevalent industry is Retail trade with 2,593 employees (13.4% of total). Additionally, the Construction industry has 1,071 employees (0.06% of total) and the Manufacturing industry has 1,483 employees (0.08% of total). (SCAG, 2021b) The Project's employment generation would not induce substantial growth in the area because the Project would result in service-oriented and industrial-oriented jobs, which are jobs that are anticipated to be filled by residents of the City and surrounding area.

According to the Bureau of Labor Statistics (BLS), in August 2021, the Riverside-San Bernardino-Ontario region's civilian labor force has an unemployment rate of 7.6% (or 159,300 persons) (BLS, 2021), well above average for the state. Accordingly, the Riverside-San Bernardino-Ontario region contains an ample supply of potential employees and the Project's labor demand is not expected to draw a substantial number of new, unplanned residents to the area. Furthermore, approximately 91.1% of Beaumont residents commute outside of the City for work and more housing units are expected to be built within the City over the next 20 years. The Project would provide job opportunities close to home for Beaumont residents, which would subsequently help achieve a better job-to-housing balance within the City.

In summary, because it is anticipated that most of the Project's future employees would already be living in the City or the surrounding areas, the Project's introduction of employment opportunities on the Project site would not induce substantial unplanned growth in the area.

Would approval of this project involve some precedent setting action that could encourage and facilitate other activities that could significantly affect the environment?

No. The Beaumont General Plan Land Use and Community Design Element designates the Project site as Rural Residential The Project Applicant's proposed General Plan Amendment (GPA) PLAN2019-0284 would amend the City's General Plan Land Use Map to modify the land use designations for the Project site from "Rural Residential" to "Industrial (I)," "General Commercial (GC)," "Open Space (OS)," and "Open Space-Conservation (OS-C)." The Project Applicant also proposes to annex and incorporate the Project site into the City. As such, the Project Applicant is proposing Pre-Zone PLAN2019-0283 to amend the City's Zoning Map to include the Project site and classify the Project site as "Specific Plan (Beaumont Pointe Specific Plan)". The Project is limited to the Project site's boundaries and does not include any components that would indirectly affect existing or planned uses on neighboring properties. Project development is occurring adjacent to an industrial corridor, as

[11] Based on standard employment factors in the City's General Plan. Specifically, 1,000 s.f./employee for 4,500,000 s.f. Industrial Warehouse, 750 s.f./employee for 500,000 s.f. General Light Industrial, and 1,163 s.f./employee for 336,000 s.f. of Commercial.

designated by the City. The development of the proposed commercial, industrial, and open uses on the Project site would not reasonably or foreseeably cause the redevelopment of other properties or cause development on other properties.

Furthermore, the Project's potential influence on other nearby properties to redevelop at greater intensities and/or different uses than the City's General Plan and Zoning Code allow is speculative; however, it should be noted that implementation of the Project would not result in the approval of proposed uses on any other property outside of the Project site. CEQA does not require the analysis of speculative effects (State CEQA Guidelines Section 151454). If any other property owner were to propose development of a property in the Project vicinity or in any part of the City, the development project would require evaluation under CEQA based on its own merits.

The operation and maintenance of the Project would generate jobs, but any potential growth-inducing impact of the employment of persons at the Project site was accounted for in the City's General Plan, as the Project's proposed 5,456 total jobs represent approximately 33% of the anticipated jobs within the City's SOI and approximately 14% of the City's total job pool. Accordingly, the Project would not directly or indirectly promote growth either at the Project site or at the adjacent and surrounding properties that were not accounted for in the City's General Plan. Upon the approval of the General Plan Amendment, Pre-Zone, Specific Plan, VTPM, and Development Agreement for the Project, the Project would be consistent with the existing General Plan land use designation and Zoning classification for the Project site. (DEIR, pp. 5-5 to 5-8).

7.0 ALTERNATIVES

7.4.1 ALTERNATIVES CONSIDERED AND REJECTED

An EIR is required to identify any alternatives that were considered by the Lead Agency but were rejected. Factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR include: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid or substantially lessen one or more significant environmental impacts. The Project's significant impacts that cannot be mitigated to less than significant are: air quality, greenhouse gas emissions, noise, and VMT.

With respect to the feasibility of potential alternatives to the proposed Project, CEQA Guidelines Section 15126.6(f)(1) provides:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"*

In determining a range of reasonable alternatives to be evaluated in the EIR, a number of possible alternatives were initially considered and, for a variety of reasons, rejected. Alternatives were rejected because either: 1) they could not accomplish the basic objectives of the Project, 2) they would not have avoided or substantially lessened significant adverse environmental impacts, or 3) they were considered infeasible to construct or operate. Alternatives that were considered but rejected are described below.

Alternative Sites

CEQA does not require that an analysis of alternate sites always be included in an EIR. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines Section 15126.6(f)(2)(A)). In addition, an alternative site need not be considered when implementation is "remote and speculative," such as when the alternative site is beyond the control of a project applicant.

The Project proposes to develop an approximately 539.9-acre site with a maximum of 246,000 sf of general commercial uses in addition to a 125-room hotel (90,000 sf) and a maximum of 4,995,000 sf of industrial uses. The Project Applicant has ownership and control over the Project site, and the Project site's location in proximity to SR-60, which provides direct access to the regional transportation network, connecting the site to the Ports of Long Beach and Los Angeles, adjacent to an existing industrial development (under construction) and away from residential uses is conducive to industrial and commercial development.

There are no alternative sites within the City or its sphere of influence that are similarly sized that would be suitable for industrial and commercial uses proposed by the Project. Other developable land within the City would either require a general plan amendment and zone change or would place industrial and commercial uses closer to established residential communities. Additionally, the Project Applicant does not own or control another suitable site that would achieve the underlying purpose and objectives of the Project. Moreover, an alternative site would not result in reduction of significant impacts.

Given the size and type of the proposed development, a similarly sized project and land use elsewhere in the South Coast Air Basin would result in the same or greater project-level and cumulative air quality, GHG emission, and transportation impacts. Significant unavoidable regional air quality and GHG emission impacts of the Project relate primarily to mobile emissions during operation and are not site specific; therefore, relocation of the Project would not substantially reduce these impacts whether located elsewhere in the City or region. The Project's location is preferrable for industrial and commercial development to other areas of the City because of its proximity to 1) the regional transportation network and major infrastructure, reducing vehicle miles traveled; and 2) within an industrial corridor separated from sensitive receptors (e.g. residential uses, schools, etc.), reducing potential located air quality and associated health risk impacts to surrounding neighborhoods. Therefore, analysis of an alternative site for the Project is neither meaningful nor necessary, because the significant impacts resulting from the Project would not be avoided or substantially lessened by its implementation in an alternate location.

As a result, this alternative was rejected from further consideration in the DEIR. (DEIR, pp. 6-5 to 6-6)

All-Commercial Alternative

The All-Commercial Only Alternative would propose the Project site for regional commercial uses only. This was considered as an alternative land use that met or partially met some basic Project objectives. Namely, the All-Commercial Alternative would have the ability to minimize the demand for water resources in support of Objective I and partially meet the following Project Objectives:

- Objective C. Maximizing opportunities to develop land in the City's sphere of influence to provide job opportunities and economic benefit to the City and its residents, including new sales and property tax revenues that can be used for City services and providing sufficient fiscal benefit to permit annexation of the Project site into the City.

- Objective D. Creating new job opportunities within the City of Beaumont to improve and maximize the jobs to housing balance within the City and reduce the need for members of the existing local workforce to commute long distances.

- Objective G. Developing a project that utilizes existing investment in capital improvements for water, reclaimed water, sewer, storm drain and circulation facilities to further the planned development of land in the City and in its sphere of influence.

However, while the commercial uses under the All-Commercial Alternative would construct regional shopping uses providing shopping and restaurants, it would not provide wellness-based retail, including recreation or hospitality, thereby only partially meeting Project Objective E: Fulfilling a need in the City and region for wellness-based retail, including entertainment, recreation, hospitality, and restaurants. Furthermore, this alternative would not meet the following objectives:

- •Objective A. Develop large land areas in the City and particularly south of SR-60 and adjacent to existing industrial uses, infrastructure and truck routes to meet the growing demand for large scale industrial and warehouse development in the City while minimizing impacts of industrial development on residential and other sensitive receptors in the City, which are primarily located north of SR-60.

- Objective F. Developing a center that will accommodate a variety of future tenants, including light manufacturing, warehouse, distribution tenants and other businesses that rely on transportation efficiency within an industrial corridor in a location with superior access to the local and regional transportation network, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.

- Objective H. Developing a range of warehouse facility options, such as varying structure sizes and building configurations within the City with high-quality businesses to facilitate local and regional distribution of goods while minimizing vehicle miles traveled, air quality and greenhouse gas impacts.

Additionally, the All-Commercial Alternative was rejected from further consideration because it would not reduce or eliminate the Project's significant and unavoidable impacts for air quality, GHG emissions, or VMT. Based on the Institute of Transportation Engineers (ITE) trip rate for regional shopping centers (ITE 820), the All-Commercial Alternative would result in a substantial increase in vehicle trips in comparison to the Project. For example, a 750,000 square foot regional shopping center would generate 34,786 daily trips. Although this alternative would reduce truck trips, it would nearly double the Project's 16,266 daily trips resulting in a substantial increase in air quality emissions, GHG emissions, and transportation impacts. (see DEIR *Technical Appendix P*). (DEIR, pp. 6-5 to 6-8)

Rural Residential Alternative

A Rural Residential Alternative was considered that assumed rural residential uses consistent with the County's existing General Plan and zoning designations. The Project site is designated as Rural Mountainous (RM) in the County of Riverside General Plan, which allows single-family residential uses with a minimum lot size of 10 acres. Based on Riverside County Ordinance No. 348, the Project site is zoned Controlled Development Areas with a minimum 20-acre lot (W-2-20). Based on the County's existing general plan and zoning designations, the 539.9-acre Project site would be allowed to develop up to 27 rural residential units. However, the Project site is not well suited to rural development in that it lacks potable groundwater and would require use of septic tanks, which is discouraged. Although water, sewer and roadway infrastructure is available at the easternmost portion of the site, the limited number of units that could be constructed would not be able to sustain the costs

needed to develop roadways or to take the infrastructure connections across the site for these homestead type developments rendering such development infeasible. In addition, development of homes in very high and high severity fire hazard zones in such a dispersed development pattern significantly increases wildfire risk and is highly discouraged, and the amount of fuel modification required could also be difficult to achieve given the limited number of units that would be permitted. Additionally, this alternative would not meet any of the Project objectives. Therefore, this alternative was rejected from further consideration in the DEIR. (DEIR, p. 6-8)

7.4.2 ALTERNATIVES UNDER CONSIDERATION

A. No Project/No Development Alternative

- **Finding**

The No Project/No Development Alternative assumes that no development or improvements would occur on the Project site and the entire site would remain vacant and undeveloped. Under this alternative, no impact would occur and all significant and unavoidable impacts would be eliminated. However, none of the Project Objectives would be met and environmental benefits from the Project would not be constructed. Thus, The City finds that each of the reasons set forth below is an independent ground for rejecting the No Project/No Development Alternative, and by itself, independent of any other reason, justifies rejection of the No Project/No Development Alternative, and hereby rejects the No Project/No Development Alternative.

- **Substantial Evidence**

The No Project/No Development Alternative assumes that no development or improvements would occur on the Project site and the entire 539.9-acre site would remain vacant and undeveloped. This alternative was selected by the City as required by CEQA Guidelines Section 15126.6(e)(3)(B) to compare the environmental effects of the Project with an alternative that would leave the Project site in its existing condition (as described in DEIR Section 3.0).

The No Project/No Development Alternative would result in no physical environmental impacts to the Project site. All significant and unavoidable impacts of the Project would be eliminated by the selection of the No Project/No Development Alternative. However, this alternative would not receive the environmental benefits from the permanent conservation of 152.42 acres of natural habitat consistent with the MSHCP; implementation of stormwater drainage and water quality filtration features; and ignition resistant structures and other wildfire prevention protocols, parking areas, and irrigated landscaping within a HFHSZ and VHFHSZ that would be constructed by the Project. Specifically, drainage improvements or water quality features would not be installed and runoff would continue to flow northeast across the site to the 16 existing Caltrans maintained culverts, as it does under existing conditions. The four detention basins proposed under the Project, which remove pollutants from runoff and filter the water to meet water quality standards, would not occur. The No Project/No Development Alternative would not result in the removal of existing fuel sources or development of ignition resistant structures, parking areas, and irrigated landscaping within a VHFHSZ and HFHSZ, which reduces potential wildfire risks The No Project/No Development Alternative would also fail to meet all the Project Objectives, as described in DEIR Section 6.1.1. (DEIR, pp. 6-9 to 6-15)

B. Existing City General Plan Alternative

❑ Finding

The No Project - Existing General Plan Alternative considers development of the Project site with residential development of up to 383 single family units on the Project site. Under this alternative, impacts related to aesthetics, construction-related air quality, GHG emissions, energy, hazards and hazardous materials, noise, transportation, utilities and service systems, and some impacts from wildfire would be reduced and significant and unavoidable impacts related to operational-related air quality, off-site traffic-related noise, and transportation impacts would be eliminated. However, none of the Project Objectives would be met. Thus, The City finds that each of the reasons set forth above is an independent ground for rejecting the Existing City General Plan Alternative, and by itself, independent of any other reason, justifies rejection of the Existing City General Plan Alternative, and hereby rejects the Existing City General Plan Alternative.

❑ Substantial Evidence

In accordance with CEQA Guidelines Section 15126.6(e)(3)(A), the No Project - Existing General Plan Alternative considers development of the Project site with land uses that are consistent with the existing City's General Plan land use designation. The City's General Plan designates the Project site as Rural Residential 1 which permits one single-family dwelling per one acre lot. The General Plan further anticipates that buildout of the Rural Residential 1 land use in the City's Sphere of Influence (SOI) would consist of up to 383 dwelling units. Accordingly, the Existing City General Plan Alternative considers that the Project site would be annexed into the City for a residential development of up to 383 single family units on the Project site. Under this alternative, the Project site would be graded within approximately the same boundaries as the limit of grading for the Project in order to create residential one acre lots.

The Existing City General Plan Alternative would reduce the number of vehicle trips by 78% and associated VMT, which is calculated based on square footage/dwelling units and the types of use. Therefore, implementation of the Existing General Plan Alternative would result in fewer impacts from construction-related air quality and GHG emissions that would occur from implementation of the Project. Under the Existing City General Plan Alternative, the volume of VOC, NO_X, PM_{10}, and $PM_{2.5}$ operational-related emissions would be reduced to approximately 29.78, 21.88, 27.45, and 8.11 pounds per day during summer and 28.26, 22.66, 27.45, and 8.11 pounds per day during winter, respectively (see *Technical Appendix P* of the DEIR). The South Coast AQMD thresholds for VOC, NO_X, PM_{10}, and $PM_{2.5}$ are 55, 55, 150, and 55, respectively. Therefore, this alternative would eliminate the Project's significant and unavoidable operational air quality emissions, and impacts under this alternative would be less than significant. Moreover, the Project would result in a net increase of 60,638.09 $MTCO_2e$ per year after the implementation of mitigation measures, which would be reduced to 5,131.02 $MTCO_2e$ per year under the Existing City General Plan Alternative. This alternative would still result in significant and unavoidable GHG impacts, since it would exceed the threshold of 3,000 $MTCO_2e$ per year. Therefore, GHG emissions impacts would remain significant and unavoidable, but reduced compared to the Project.

Operational noise impacts would be reduced under this alternative for both on-site stationary noise sources and off-site traffic-related noise, since residential uses do not generate significant stationary noise sources and truck trips would be eliminated. Therefore, the Existing City General Plan Alternative would eliminate the Project's significant and unavoidable off-site traffic-related noise impacts that mainly occur due to truck trips, and impacts would be less than significant. As shown in DEIR Table 6-2, this alternative would also eliminate the Project's significant and unavoidable VMT impact, and impacts would be less than significant (see *Technical Appendix P* of the DEIR).

The Existing City General Plan Alternative would reduce impacts related to aesthetics, construction-related air quality, GHG emissions, energy, hazards and hazardous materials, noise, transportation, utilities and service systems, and some impacts from wildfire. By constructing ignition resistant buildings in a focused area, creating defensible space, and implementing vegetation management protocols, the Project would reduce the overall risk of wildfire spread on and off site while the development of homes in very high and high severity fire hazard zones in such a dispersed development pattern significantly increases wildfire risk, and the amount of fuel modification required could also be difficult to achieve given the limited number of units.

Additionally, this alternative would eliminate the Project's significant and unavoidable impacts related to operational-related air quality, off-site traffic-related noise, and transportation impacts. The Existing City General Plan Alternative would result in greater impacts related to population and housing, public services, and recreation compared to the Project. Impacts related to agricultural and forestry resources, biological resources, cultural resources, geology and soils, hydrology and water quality, land use and planning, mineral resources, and tribal cultural resources would be similar to the Project. The Existing City General Plan Alternative would also fail to meet all the Project Objectives, as described in DEIR Section 6.1.1. (DEIR, pp. 6-15 to 6-22)

C. Reduced Development Area and Intensity Alternative

- **Finding**

The Reduced Development Area and Intensity Alternative would result in a development with overall 50% reduction of commercial portion within Planning Areas 1 and 2 and an overall reduction of 995,000 sf of industrial portion. Due to the reduction in square footage, development area, and vehicular trips, impacts related to aesthetics, air quality, biological resources, cultural resources, energy, geology, and soils, GHG emissions, hydrology and water quality, noise, public services, transportation, and tribal cultural resources would be reduced. Impacts related to population and housing, therefore, would be greater under this alternative compared to the Project due to the decrease in the jobs-housing ratio. Moreover, all significant and unavoidable impacts related to air quality, GHG emissions, noise, and transportation would remain. The Reduced Development Area and Intensity Alternative would meet most of the basic objectives including Project Objectives A, B, and F-I. As compared with the Project, this alternative would not meet the Project Objectives C, D, and E to the same extent, due to a reduced industrial and commercial building square footage and proportional reduction in employees and economic benefit. Thus, the City finds that each of the reasons set forth above is an independent ground for rejecting the Reduced Development Area and Intensity Alternative,

and by itself, independent of any other reason, justifies rejection of the Reduced Development Area and Intensity Alternative, and hereby rejects the Reduced Development Area and Intensity Alternative.

- **Substantial Evidence**

The Reduced Development Area and Intensity Alternative would result in an overall 50% reduction of commercial development within Planning Areas 1 and 2 and an overall reduction of 995,000 sf of industrial development. The reduction in industrial development would occur by eliminating 995,000 sf in Planning Area 8 and expanding Planning Area 7 to allow an additional 305,000 sf (up to 905,000 sf) of industrial development. Overall, the Reduced Development Area and Intensity Alternative would allow for up to 123,000 sf of commercial development, a 125-room hotel, and 4,000,000 sf of industrial development.

The Reduced Development Area and Intensity Alternative was selected to reduce impacts associated with air quality, GHG emissions, noise, and transportation. Additionally, the Reduced Development Area and Intensity Alternative would result in a considerable reduction in grading activities (eliminating approximately 3 million cubic yards of cut and fill) which would result in the less construction-related air quality impact compared to the Project.

The Reduced Development Area and Intensity Alternative would reduce the number of vehicle trips by approximately 15% and associated VMT, which is calculated based on square footage and the types of use. Under the Project, the volume of VOC, NO_X, PM_{10}, and $PM_{2.5}$ emissions would be 44.52, 143.99, 50.89, 15.25 pounds per day respectively during summer of Phase 1; 160.65, 461.71, 195.00, 57.71 pounds per day respectively during summer of Phase 2; 188.63, 470.01, 236.44, 69.23 pounds per day respectively during summer of Phase 3; 43.22, 151.09, 50.89, 15.25 pounds per day respectively during winter of Phase 1; 155.69, 485.80, 195.00, 57.71 pounds per day respectively during winter of Phase 2; and 179.96, 494.43, 236.44, 69.23 pounds per day respectively during winter of Phase 3. Under the Reduced Development Area and Intensity Alternative, the volume of VOC, NO_X, PM_{10}, and $PM_{2.5}$ emissions would be reduced to approximately 156.97, 327.60, 188.64, 54.78 pounds per day respectively during summer and 149.44, 344.82, 188.64, and 54.78 pounds per day respectively during winter, respectively (see *Technical Appendix P* of the DEIR). The South Coast AQMD thresholds for VOC, NO_X, PM_{10}, and $PM_{2.5}$ are 55, 55, 150, and 55, respectively. Under this alternative, $PM_{2.5}$ emissions for both summer and winter would be reduced to a less than significant level, but the Project's operational air quality emissions for VOC, NO_X, PM_{10} emissions would remain significant and unavoidable. Moreover, the Reduced Development Area and Intensity Alternative would result in 48,007.58 $MTCO_2e$ per year of GHG emissions (approximately 83% mobile source) compared to the Project's 63,911.07 $MTCO_2e$ per year (approximately 80% mobile source) prior to the implementation of mitigation measures. This alternative would result in a reduction of GHG emissions by approximately 24.88% but would not avoid the Project's significant and unavoidable GHG impacts, since it would significantly exceed the threshold of 3,000 $MTCO_2e$ per year. Therefore, GHG emissions impacts would remain significant and unavoidable, but substantially lessened compared to the Project.

Operational noise would also be reduced under this alternative as traffic-generated and stationary noise sources would decrease in relation to the reduction in industrial and commercial square footage. However, Project-related off-site traffic noise level increases are considered significant and unavoidable. Noise impacts from the Reduced Development Area and Intensity Alternative would remain significant and unavoidable but reduced compared to the Project.

Construction and operation-related vehicle truck trips would be reduced under the Reduced Development Area and Intensity Alternative and Project trip generation would decrease vehicle trips by 15% from 16,266 trips-ends per day to 13,614 trips-ends per day. This would result in a corresponding decrease in overall VMT and proportional decrease in employees. As shown, in DEIR Table 6-4, *Comparison of Project VMT to the Reduced Development Area and Intensity Alternative*, this alternative would also reduce VMT per service population by approximately 7% (from 39.19 to 36.45) compared to the Project (see DEIR *Technical Appendix P*). However, the Reduced Development Area and Intensity Alternative would continue to exceed the City's baseline VMT threshold of 27.03 and impacts would remain significant and unavoidable but reduced when compared to the Project.

The Reduced Development Area and Intensity Alternative would result in reduced impacts related to aesthetics, energy, hydrology and water quality, and public services, , due to the reduction in overall square footage, development area, and associated vehicular trips. Impacts related to biological resources, cultural resources, geology, and soils, and tribal cultural resources would be less than significant with mitigation and reduced compared to the Project. However, significant and unavoidable impacts related to air quality, GHG emissions, noise, and transportation would not be avoided but would be reduced from implementation of this alternative. In addition, this alternative would not achieve the maximum improvement in jobs housing ratio. Impacts related to population and housing, therefore, would be greater under this alternative compared to the Project due to the decrease in the jobs-housing ratio. Impacts related to agriculture and forestry resources, hazardous and hazardous materials, land use and planning, mineral resources, recreation, utilities and service systems, and wildfire would be similar to the Project.

The Reduced Development Area and Intensity Alternative would meet most of the basic objectives including Project Objectives A, B, and F-I, as described in Section 6.1.1 of the DEIR. As compared with the Project, this alternative would not meet Project Objectives C and D, and would not meet Project Objective E to the same extent, due to a reduced industrial and commercial building square footage and proportional reduction in employees and economic benefit:

- Objective C. Maximizing opportunities to develop land in the City's sphere of influence to provide job opportunities and economic benefit to the City and its residents, including new sales and property tax revenues that can be used for City services and providing sufficient fiscal benefit to permit annexation of the Project site into the City.
- Objective D. Creating new job opportunities within the City of Beaumont to improve and maximize the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances.

- Objective E. Fulfilling a need in the City and region for wellness based retail, including entertainment, recreation, hospitality, and restaurants. (DEIR, pp. 6-22 – 6-30)

D. Reduced Intensity Alternative

❑ Finding

The Reduced Intensity Alternative would result in a development with 4,495,500 sf of industrial development, 221,400 sf of commercial development, and a 125-room hotel. Under this alternative, impacts related to air quality, energy, GHG emissions, noise, public services, and utilities and service systems would be reduced due to the reduction in square footage and associated vehicular trips. However, significant and unavoidable impacts related to air quality, GHG emissions, noise, and transportation would continue to occur from implementation of this alternative. Impacts related to aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazardous and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, recreation, transportation, tribal cultural resources, and wildfire would be similar to the Project. The Reduced Intensity Alternative would meet most of the basic objectives including Project Objectives A, B, and F–I, as described in DEIR Section 6.1.1. As compared with the Project, this alternative would not meet Project Objectives C, D, and E to the same extent, due to the reduced industrial and commercial building square footage and proportional reduction in employees. Thus, The City finds that each of the reasons set forth above is an independent ground for rejecting the Reduced Intensity Alternative, and by itself, independent of any other reason, justifies rejection of the Reduced Intensity Alternative, and hereby rejects the Reduced Intensity Alternative.

❑ Substantial Evidence

The Reduced Intensity Alternative would consider development of the Project site with a 10% reduction in industrial and commercial development. Under this alternative, the Project would allow for 4,495,500 sf of industrial development, 221,400 sf of commercial development, and a 125-room hotel. The development impact area would generally remain the same as the Project. Access to the site would be the same with a proportional reduction in the number of parking spaces. The Reduced Intensity Alternative was selected to reduce significant impacts associated with air quality, GHG emissions, noise, and transportation.

The Reduced Intensity Alternative would reduce the number of vehicle trips and associated VMT by 10%, which is calculated based on square footage and the types of use. Under the Reduced Intensity Alternative, the volume of VOC, NO_X, PM_{10}, and $PM_{2.5}$ emissions would be reduced to approximately 188.63, 468.14, 236.20, 69.01 pounds per day during summer and 180.30, 491.49, 236.20, and 69.01 pounds per day during winter, respectively (see DEIR *Technical Appendix P*). Under the Project, the volume of VOC, NO_X, PM_{10}, and $PM_{2.5}$ emissions would be 44.52, 143.99, 50.89, 15.25 pounds per day respectively during summer of Phase 1; 160.65, 461.71, 195.00, 57.71 pounds per day respectively during summer of Phase 2; 188.63, 470.01, 236.44, 69.23 pounds per day respectively during summer of Phase 3; 43.22, 151.09, 50.89, 15.25 pounds per day respectively during winter of Phase 1; 155.69, 485.80, 195.00, 57.71 pounds per day during winter of Phase 2; and 179.96, 494.43, 236.44, 69.23

pounds per day during winter of Phase 3, respectively. The South Coast AQMD thresholds for VOC, NO_X, PM_{10}, and $PM_{2.5}$ are 55, 55, 150, and 55, respectively. Therefore, this alternative would reduce the Project's operational air quality emissions, but all impacts would remain significant and unavoidable. The Project would result in approximately 63,911.07 $MTCO_2e$ per year (approximately 80% mobile source) with the implementation of PDFs and prior to the implementation of mitigation measures, which would be reduced by approximately 19.33% to 51,556.08 $MTCO_2e$ per year (approximately 84% mobile source) under the Reduced Intensity Alternative (see *Technical Appendix P* of the DEIR). However, the Project's significant and unavoidable GHG impacts would remain, since the alternative's GHG emissions would exceed the threshold of 3,000 $MTCO_2e$ per year. Therefore, GHG emissions impacts would remain significant and unavoidable, but substantially lessened compared to the Project.

As shown, in DEIR Table 6-6, *Comparison of Project VMT to the Reduced Intensity Alternative*, this alternative would slightly increase VMT per service population by approximately 1.61% (from 39.19 to 39.82) compared to the Project (see DEIR *Technical Appendix P*). Therefore, the Reduced Intensity Alternative would continue to exceed the City's baseline VMT threshold and impacts would remain significant and unavoidable, but similar compared to the Project.

Operational noise would also be reduced under this alternative as traffic-generated and stationary noise sources would decrease in relation to the reduction in industrial and commercial square footage. However, Project-related off-site traffic-related noise level increases would remain significant and unavoidable. Noise impacts from the Reduced Intensity Alternative would remain significant and unavoidable for off-site traffic-related noise but reduced compared to the Project.

The Reduced Intensity Alternative would result in reduced impacts related to energy public services, and utilities and service systems due to the reduction in square footage and associated vehicular trips. However, significant and unavoidable impacts related to air quality, GHG emissions, noise, and transportation would not be avoided or substantially lessened from implementation of this alternative. Impacts related to aesthetics, agriculture and forestry resources, hazardous and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, recreation, and wildfire would be similar to the Project. Impacts related to biological resources, cultural resources, geology, and soils, and tribal cultural resources would be less than significant with mitigation, and similar compared to the Project.

The Reduced Intensity Alternative would meet most of the basic objectives including Project Objectives A, B, and F–I, as described in DEIR Section 6.1.1. As compared with the Project, this alternative would not meet Project Objectives C, D, and E to the same extent, due to the reduced industrial and commercial building square footage and proportional reduction in employees and would not maximize opportunities to create jobs within the City, which are core components of Objectives C

and D The Reduced Intensity Alternative would result in a total of 4,700 jobs[12], a reduction in 756 jobs when compared to the Project-generated 5,456 jobs:

- Objective C. Maximizing opportunities to develop land in the City's sphere of influence to provide job opportunities and economic benefit to the City and its residents, including new sales and property tax revenues that can be used for City services and providing sufficient fiscal benefit to permit annexation of the Project site into the City.

- Objective D. Creating new job opportunities within the City of Beaumont to improve and maximize the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances.

- Objective E. Fulfilling a need in the City and region for wellness based retail, including entertainment, recreation, hospitality, and restaurants. (DEIR, pp. 6-30 – 6-37)

E. Truck Storage Yard Alternative

❑ Finding

The Truck Storage Yard Alternative would result in a development of up to 246,000 sf of commercial development, a 125-room hotel, 4,000,000 sf of industrial development, and a truck storage yard for an approximately 20% decrease in total building square footage. Under this alternative, impacts related to air quality, energy, GHG emissions, noise, public services, and utilities and service systems would be reduced due to the reduction in square footage and associated vehicular trips. However, significant and unavoidable impacts related to air quality, GHG emissions, noise, and transportation would continue to occur from implementation of this alternative. Impacts related to aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazardous and hazardous materials, hydrology and water quality, land use and planning, mineral resources, recreation, transportation, tribal cultural resources, and wildfire would be similar to the Project; and impacts related to population and housing would be greater compared to the Project. The Truck Storage Yard Alternative would meet most of the basic objectives including Project Objectives, A, B, and E–I, as described in DEIR Section 6.1.1. As compared with the Project, this alternative would not meet Project Objectives C and D to the same extent, due to the reduced industrial and commercial building square footage and proportional reduction in employees. Thus, The City finds that each of the reasons set forth above is an independent ground for rejecting the Truck Storage Yard Alternative, and by itself, independent of any other reason, justifies rejection of the Truck Storage Yard Alternative, and hereby rejects the Truck Storage Yard Alternative.

❑ Substantial Evidence

The Truck Storage Yard Alternative would be the same as the Project except that it would replace the warehouse building in Planning Area 8 (approximately 1,000,000 sf) with a truck storage and lay down

[12] Based on standard employment factors in the City's General Plan. Specifically, 1,000 s.f./employee for 4,450,500 s.f. Industrial Warehouse, 750 s.f./employee for 45,000 s.f. General Light Industrial, and 1,163 s.f./employee for 221,400 s.f. of Commercial

yard. Overall, the Project would allow for up to 246,000 sf of commercial development, a 125-room hotel, 4,000,000 sf of industrial development, and a truck storage yard for an approximately 20% decrease in total building square footage. It is assumed that the truck storage yard would be an ancillary use to one of the adjacent industrial warehouse buildings. The Truck Storage Yard Alternative was selected to reduce impacts associated with air quality, GHG emissions, noise, and transportation. The grading quantities and phases would be the same as the Project. The Truck Storage Yard Alternative would reduce the number of vehicle trips. Trip generation is calculated based on square footage and the types of use. The Truck Storage Yard Alternative would result in a total of 14,136 vehicle trips, compared to the Project's 16,266 trips (see DEIR *Technical Appendix P).*

The Truck Storage Yard Alternative would reduce the number of vehicle trips by 13% and associated VMT, which is calculated based on square footage and the types of use. Under the Project, the volume of VOC, NO_X, PM_{10}, and $PM_{2.5}$ emissions would be 44.52, 143.99, 50.89, 15.25 pounds per day respectively during summer of Phase 1; 160.65, 461.71, 195.00, 57.71 pounds per day respectively during summer of Phase 2; 188.63, 470.01, 236.44, 69.23 pounds per day respectively during summer of Phase 3; 43.22, 151.09, 50.89, 15.25 pounds per day respectively during winter of Phase 1; 155.69, 485.80, 195.00, 57.71 pounds per day respectively during winter of Phase 2; and 179.96, 494.43, 236.44, 69.23 pounds per day respectively during winter of Phase 3, respectively. Under the Truck Storage Yard Alternative, the volume of VOC, NO_X, PM_{10}, and $PM_{2.5}$ emissions would be reduced to approximately 162.47, 322.85, 196.97, 57.09 pounds per day respectively during summer and 154.16, 350.34, 196.98, and 57.10 pounds per day respectively during winter, respectively. The South Coast AQMD thresholds for VOC, NO_X, PM_{10}, and $PM_{2.5}$ are 55, 55, 150, and 55, respectively. Therefore, this alternative would not reduce the Project's operational air quality emissions to a less than significant level and a significant unavoidable air quality impact would remain. Moreover, the Project would result in approximately 63,911.07 $MTCO_2e$ per year (approximately 80% mobile source) with the implementation of PDFs prior to the implementation of mitigation measures, which would be reduced by approximately 23.87% to 48,655.28 $MTCO_2e$ per year (approximately 83% mobile source) under the Truck Storage Yard Alternative. This alternative would still result in significant and unavoidable GHG impacts, since it would exceed the threshold of 3,000 $MTCO_2e$ per year. Therefore, GHG emissions impacts would remain significant and unavoidable, but substantially lessened compared to the Project.

Operational noise would also be reduced under this alternative as traffic-generated and stationary noise sources would decrease in relation to the reduction in industrial square footage. However, Project-related off-site traffic noise level increases are considered significant and unavoidable. Noise impacts from the Truck Storage Yard Alternative would remain significant and unavoidable but reduced compared to the Project.

As shown, in DEIR Table 6-8, *Comparison of Project VMT to the Truck Storage Yard Alternative*, this alternative would result in a slight increase VMT per service population by 1.76% (from 39.19 to 39.88) compared to the Project (see DEIR *Technical Appendix P*). Therefore, the Truck Yard Alternative would continue to exceed the City's baseline VMT threshold and impacts would remain significant and unavoidable, and similar to the Project.

Under the Truck Storage Yard Alternative, buildout would result in a total of 4,345 jobs, 1,111 fewer jobs compared to the Project's generated 5,456 jobs. However, the jobs-housing ratio would decrease from the Project's 0.92 to 0.85 for the City under existing plus Alternative Project conditions and from 0.93 to 0.88 under buildout year plus project conditions, creating a greater jobs-housing imbalance as compared to the Project, and would impede the project objective of maximizing the opportunity of increasing the jobs housing balance. Overall, impacts to population and housing would remain less than significant with this alternative, but would be greater than the Project.

The Truck Storage Yard Alternative would result in reduced impacts related to air quality, energy, GHG emissions, noise, public services, and utilities and service systems due to the reduction in square footage and associated vehicular trips. However, significant and unavoidable impacts related to air quality, GHG emissions, noise, and transportation would not avoid or substantially lessened from implementation of this alternative. Impacts related to aesthetics, agriculture and forestry resources, biological resources, cultural resources, geology and soils, hazardous and hazardous materials, hydrology and water quality, land use and planning, mineral resources, recreation, transportation, tribal cultural resources, and wildfire would be similar to the Project; and impacts related to population and housing would be greater compared to the Project. The Truck Storage Yard Alternative would meet most of the basic objectives including Project Objectives, A, B, and E–I, as described in DEIR Section 6.1.1. As compared with the Project, this alternative would not meet the Project Objectives C and D to the same extent, due to the reduced industrial and commercial building square footage and proportional reduction in employees and would not maximize opportunities to create jobs within the City, which are core components of Objectives C and D:

- Objective C. Maximizing opportunities to develop land in the City's sphere of influence to provide job opportunities and economic benefit to the City and its residents, including new sales and property tax revenues that can be used for City services and providing sufficient fiscal benefit to permit annexation of the Project site into the City.

- Objective D. Creating new job opportunities within the City of Beaumont to improve and maximize the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances. (DEIR, pp. 6-37 – 6-44)

7.4.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The City finds as follows with respect to selection of an environmentally superior alternative and, in accordance with Section 15126.5 of the CEQA Guidelines selects the Reduced Development Area and Intensity Alternative as the environmentally superior alternative. In addition to the discussion and comparison of impacts of a proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts.

Section 15126.6(e)(2) of the CEQA Guidelines states if the No project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

The No Project/No Development Alternative has the least impact to the environment because it would not involve any construction activities or commercial/industrial operations. There would be no impacts associated with a cumulatively considerable increase of VOC, NOX, PM_{10}, and $PM_{2.5}$ during construction and operation, and no cumulative impacts related to GHG emissions, off-site traffic-related noise, and VMT. These impacts are considered significant and unavoidable for the Project. While this alternative would avoid the significant effects of the Project, it would not receive the environmental benefits from conservation of 152.42 acres of natural habitat; implementation of stormwater drainage and water quality filtration features; and ignition resistant structures, parking areas, and irrigated landscaping within a VHFHSZ and HFHSZ that would be constructed by the Project. Additionally, none of the Project Objectives would be met.

The Existing City General Plan Alternative would eliminate the Project's significant and unavoidable impacts related to operational-related air quality, off-site traffic-related noise, and transportation impacts. However, the Existing City General Plan Alternative would result in greater impacts related to population and housing, public services, and recreation compared to the Project due to the increase in residents. Additionally, none of the Project Objectives would be met.

The Reduced Development Area and Intensity Alternative is environmentally superior to the Project because the alternative reduces the commercial and industrial square footage of the Project the most (non-hotel commercial square footage by 50% and the industrial square footage of the Project by approximately 20%) and also reduces the development footprint, with resulting reductions in grading, construction and off-site vehicular travel. As shown in DEIR Table 6-9, *Comparison of Alternatives and Project-related Environmental Impacts*, the Reduced Development Area and Intensity Alternative would result in reduced impacts related to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hydrology and water quality, noise, public services, transportation, tribal cultural resources, and utilities and service systems, due to the reduction in overall square footage, development area, and associated vehicular trips. Despite the reductions to the Project scope under this alternative, significant and unavoidable impacts related to air quality, GHG emissions, noise, and transportation would be reduced but would continue to occur from implementation of this alternative. Impacts related to population and housing would be greater under this alternative compared to the Project but would not be significant. Impacts related to agriculture and forestry resources, hazardous and hazardous materials, land use and planning, mineral resources, recreation, and wildfire would be similar to the Project.

As shown on DEIR Table 6-10, *Alternatives Attainment of Project Objectives*, the Reduced Development Area and Intensity Alternative would meet Project Objectives A, B, and F–I, as described in Section 6.1.1 of the DEIR. As compared with the Project, this alternative would not meet the following objectives to the same extent, due to the reduced industrial and commercial building square footage and proportional reduction in employees and economic benefit and would not maximize opportunities to create jobs within the City, which are core components of Objectives C and D:

- Objective C. Maximizing opportunities to develop land in the City's sphere of influence to provide job opportunities and economic benefit to the City and its residents, including new sales and property tax revenues that can be used for City services and providing sufficient fiscal benefit to permit annexation of the Project site into the City.

- Objective D. Creating new job opportunities within the City of Beaumont to improve and maximize the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances.

- Objective E. Fulfilling a need in the City and region for wellness-based retail, including entertainment, recreation, hospitality, and restaurants. (DEIR, pp. 6-44 – 6.45)

8.0 GENERAL CEQA FINDINGS

8.4.1 RECIRCULATION NOT REQUIRED

The City finds that the DEIR does not require recirculation under CEQA (CEQA Section 21092.1, CEQA Guidelines Section 15088.5).

(a) CEQA requires that the lead agency recirculate an EIR when significant new information is added to the EIR after public notice of its availability has previously been given but prior to its certification. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented;

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it; or

(4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

(b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

(c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.

(d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.

(e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.

The DEIR documents changes to the DEIR. The DEIR provides additional analysis that was not included in the DEIR. Furthermore, Responses to Comments contained in the DEIR fully considered and responded to comments claiming that the Project would have significant impacts or more severe impacts not disclosed in the DEIR. Furthermore, the Responses to Comments include substantial evidence that none of these comments provided substantial evidence that project would result in changed circumstances, significant new information, considerably different mitigation measures, or new or more severe significant impacts than were discussed in the DEIR. In addition, CEQA Guidelines Section 15088.5(b) provides that "recirculation is not required where the new information

added to the EIR merely clarifies and amplifies or makes insignificant modifications in an adequate EIR." Recirculation also is not required simply because new information is added to the EIR — indeed, new information is oftentimes added given CEQA's public/agency comment and response process and CEQA's post-DEIR circulation requirement of proposed responses to comments submitted by public agencies.

The City staff, Planning Commission, and City Council have thoroughly reviewed the public comments received regarding the Project and the DEIR to determine whether any of the public comments provide substantial evidence that would require recirculation of the EIR prior to its adoption.

8.4.2 MITIGATION MONITORING AND REPORTING PROGRAM

To the extent that these Findings conclude that the proposed mitigation measures outlined in herein are feasible and have not been modified, superseded, or withdrawn, the City hereby commits to implementing these measures. These Findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the City approves the proposed project. The mitigation measures that are referenced herein and adopted concurrently with these Findings will be effectuated through the process of construction and implementation of the proposed Project. In accordance with the Requirements of Public Resources Code § 21081.6, the City must adopt the Mitigation Monitoring Program, which is described in full in Section IV of the DEIR and is incorporated herein by this reference. The City reserves the right to make amendments and/or substitutions of mitigation measures if the City determines that the amended or substituted mitigation measure will mitigate the identified potential environmental impacts to at least the same degree as the original mitigation measure, and where the amendment or substitution would not result in a new significant impact on the environment which cannot be mitigated.

8.4.3 CONSIDERATION OF RECORD; INDEPENDENT JUDGMENT

In approving the proposed Project, the City decision-makers have reviewed and considered the DEIR and appendices, the DEIR and appendices, and all other pertinent evidence in the record of proceedings. The Applicant's consultants prepared the screen check versions of the DEIR, DEIR and technical studies. All such materials and all other materials related to the EIR were extensively reviewed and, where appropriate, modified by the Planning Department or other City representatives. As such, the DEIR, DEIR, technical studies, and all other related materials reflect the independent judgment and analysis of the Lead Agency.

9.0 STATEMENT OF OVERRIDING CONSIDERATIONS

This Section specifically addresses CEQA Guidelines Section 15093, which requires the City, acting as the Lead Agency, to balance the benefits of the Project against its significant and unavoidable adverse environmental impacts and determine whether the benefits which will accrue from the development of the Project outweigh its significant and unavoidable impacts. If the City finds that the major benefits of the Project outweigh its significant and unavoidable adverse environmental impacts, the City may approve the Project. Each of the separate benefits listed below are hereby determined to be, in itself, and independent of the Project's other benefits, the basis for overriding all significant and unavoidable environmental impacts identified in the EIR.

As set forth in Section 3.0 above, the EIR identified all of the Project's adverse environmental impacts and mitigation measures that can reduce the Project's impacts to less-than-significant level where feasible, or to the lowest feasible levels. Mitigation imposed by the City must have a proportional nexus to the Project's impacts. As further set forth in Section 5.0, the EIR presents evidence that implementing the Project would cause or contribute to impacts that would remain significant and unavoidable even after the imposition of all feasible mitigation measures. Finally, as set forth in Section 7.0, herein, there are no feasible alternatives to the Project that would mitigate the Project's significant and avoidable impacts to less-than-significant level or avoid those environmental impacts while still attaining most of the Project's basic objectives. Based on the facts presented throughout this document, the City makes the following finding:

As the CEQA Lead Agency for the proposed Project, the City has reviewed the Project description and the alternatives to the Project, as presented in the EIR, and the City fully understands the Project and its alternatives. The City finds and determines that:

(i) the majority of the significant impacts of the Project will be reduced to less-than significant and acceptable levels by the mitigation measures described in the Final EIR and approved and adopted by these Findings;

(ii) the City's approval of the Project will result in certain significant adverse environmental effects that cannot be avoided even with the incorporation of all feasible mitigation measures into the Project; and

(iii) all potential adverse environmental impacts and all feasible mitigation measures to reduce the impacts from the Project have been identified in the DEIR, Final EIR and public testimony and there are no other feasible mitigation measures or feasible Project alternatives that would further mitigate or avoid the remaining significant environmental effects. The significant effects that have not been mitigated to a less-than-significant level are therefore considered significant and unavoidable. Having considered the potential for the Project to cause or contribute to significant and unavoidable adverse impacts to air quality, greenhouse gas emissions, noise, and transportation, the City hereby determines that all feasible mitigation measures have been adopted to reduce or avoid the significant and unavoidable impacts identified in

the EIR, and that no additional feasible mitigation or alternatives are available to further reduce or avoid significant impacts.

(iv) economic, social, and other considerations of the Project outweigh the Project's significant and unavoidable impacts and that approval of the Project is appropriate.

Despite the potentially significant impacts, it is the City's considered judgment that the benefits offered by the proposed Beaumont Pointe Specific Plan Project (Project) outweigh the potentially adverse effects of the significant impacts. Each of the twelve overriding considerations set forth below constitutes a separate and independent ground for finding that the benefits of the Project outweigh its potential adverse effects and each such consideration, standing alone, warrants approval of the Project. Each of the Project benefits separately and individually outweighs all of the unavoidable adverse environmental effects identified in the EIR, and the City therefore finds those impacts to be acceptable.

The Project would meet the following objectives:

A. Develop large land areas in the City and particularly south of SR-60 and adjacent to existing industrial uses, infrastructure, and truck routes to meet the growing demand for large scale industrial and warehouse development in the City while minimizing impacts of industrial development on residential and other sensitive receptors in the City, which are primarily located north of SR-60.

B. Providing for conservation of open space habitat within MSHCP criteria cells in a manner consistent with the MSHCP requirements and providing access for wildlife movement to Caltrans constructed and proposed wildlife under-crossings along the SR-60 Freeway that abut the northern Project boundary to accommodate wildlife movement.

C. Maximizing opportunities to develop land in the City's sphere of influence to provide job opportunities and economic benefit to the City and its residents, including new sales and property tax revenues that can be used for City services and providing sufficient fiscal benefit to permit annexation of the Project site into the City.

D. Creating new job opportunities within the City of Beaumont which improves the jobs to housing balance within the City and reduces the need for members of the existing local workforce to commute long distances.

E. Fulfilling a need in the City and region for wellness-based retail, including entertainment, recreation, hospitality, and restaurants.

F. Developing a center that will accommodate a variety of future tenants, including light manufacturing, warehouse, distribution tenants and other businesses that rely on transportation efficiency within an industrial corridor in a location with superior access to the local and regional transportation network, thereby minimizing truck traffic on local streets and reducing vehicle miles traveled in the region.

G. Developing a project that utilizes existing investment in capital improvements for water, reclaimed water, sewer, storm drain and circulation facilities to further the planned development of land in the City and in its sphere of influence.

H. Developing a range of warehouse facility options, such as varying structure sizes and building configurations within the City with high quality businesses to facilitate local and regional distribution of goods while minimizing vehicle miles traveled, air quality and greenhouse gas impacts.

I. Minimizing the demand for water resources by creating a development-wide landscape concept that features drought-tolerant plant materials to provide for an aesthetically pleasing outdoor environment and developing a project where recycled water is planned to be available.

1. The Beaumont Pointe Specific Plan Project is consistent with and will contribute to achieving the policies, goals and objectives established by the City of Beaumont General Plan. Implementing the City's General Plan as a policy is a legal and social prerogative of the City.

The Beaumont General Plan Land Use and Community Design Element designates the Project site as Rural Residential 1. The Project Applicant's proposed GPA PLAN2019-0284 would amend the City of Beaumont's General Plan Land Use Map to modify the land use designations for the Project site from "Rural Residential" to "Industrial (I)," "General Commercial (GC)," "Open Space (OS)," and "Open Space-Conservation (OS-C)." The Beaumont Pointe Specific Plan is consistent with the General Plan policies, goals and objectives for these land use designations and other applicable General Plan policies, goals and objectives. With the approval of the proposed Project, including the Specific Plan, any future development plans and entitlement applications (tract maps, site plans, and other similar entitlements) would be required to comply with the Specific Plan and substantially conform to the standards and guidelines set forth in the other sections of the Specific Plan, as well as any other applicable City of Beaumont regulations and therefore would also be consistent with General Plan policies, goals and objectives. Although the Project would result in a change to the General Plan land use designations for the Project site to allow for implementation of the Specific Plan, these changes would not result in a conflict with applicable plans, polices, or regulations adopted for the purpose of avoiding or reducing an environmental effect (DEIR, Table 4.11-1).

2. The Beaumont Pointe Specific Plan Project is consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) and will dedicate natural habitat to the Regional Conservation Authority (RCA) pursuant to the Western Riverside County MSHCP.

The Project site is located in the MSHCP Criteria Area, within portions of independent Cells 933, 936, 1030, 1032, and 1125, as well as a portion of Cell Group A′, divided between two Area Plans: The Pass Area Plan (Cells 933, 936, 1030, 1032, and 1125) and the Reche

Canyon/Badlands Area Plan (Cell Group A′). The Project required a Criteria Refinement to approve the Specific Plan, as designed, to be consistent with the MSHCP Reserve Assembly requirements.

The Criteria Refinement analysis was approved and determined to be in concurrence with the MSHCP by the RCA, USFWS and the CDFW on November 9, 2022. On November 9, 2022, the Wildlife Agencies issued a letter to the City of Beaumont concurring with the RCA's Findings that the proposed Revised Criteria Refinement is superior or equivalent to conservation described within Proposed Core 3. In furtherance of the findings, the Project will be constructed in compliance with the Criteria Refinement analysis and the City will condition the Project to require shielded, wildlife friendly lighting for all outdoor lighting consistent with the MSHCP Urban/Wildlife Interface Guidelines (MSHCP Volume I, Section 6.1.4).

The Project would provide 124.7 acres of open space to accommodate landscaped manufactured slopes, fuel modification areas, and natural open space as a buffer to adjacent conservation area and 152.4 acres of open space – conservation. The open space – conservation area would be preserved as natural habitat and would be dedicated to the RCA as required by the Western Riverside County MSHCP. Additionally, 78.40 acres of off-site lands would be conserved and conveyed to the RCA.

3. **The Beaumont Pointe Specific Plan Project will contribute towards implementing employment opportunities in the City to improve the jobs-housing balance and to reduce unemployment within the City. Jobs for residents at a variety of income levels will be provided. The Project furthers the regional goals of Connect SoCal which designates the Beaumont area as a Job Center within a designated Priority Growth Area[13].**

   The Project would provide job opportunities close to home for Beaumont residents, which would subsequently help achieve a better job-to-housing balance within the City and the region (DEIR, Section 4.14). At full-Project buildout, the Project is estimated to generate approximately 5,456 permanent jobs. SCAG forecasted 15,900 jobs in the City by the year 2045; the Project's proposed jobs would represent approximately 34% of SCAG's forecast. The Project would contribute new employment to a housing-rich area contributing to an improved jobs-housing ratio of 0.92 for the City under existing plus Project conditions and 0.93 at Project buildout (DEIR, Table 4.14-4). Therefore, the Project would have a beneficial impact on the City's jobs-housing ratio and contribute to the City goal of reaching the recommended jobs-housing ratio of approximately 1.0. The Project would be within the anticipated business growth projections of the City and would contribute to a more balanced job-housing ratio.

[13] https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal-plan_0.pdf?1606001176

4. **Development and construction of the Beaumont Pointe Specific Plan Project will create both temporary and permanent onsite jobs and will indirectly support local and regional jobs. Additionally, construction spending will create a one-time stimulus to the local and regional economies. Once the Project is completed, the Beaumont Pointe Specific Plan Project will ultimately spur the creation of both local and regional jobs, and there would be additional output and earnings to the local and regional economies.**

   Temporary construction and long-term operational jobs created by the Project would result in increased spending throughout the region, including in the City of Beaumont. It is anticipated that annual personal earnings would increase through the generation of new jobs, and these earnings would ripple through the local and regional economy, creating a one-time increase in output and earnings associated with construction jobs and an on-going increase in output and earnings associated with permanent jobs. Employment generation associated with operation of the proposed buildings is discussed under Item 4, above. Refer to Exhibit A, Beaumont Point Specific Plan Fiscal Impact Analysis.

5. **The Beaumont Pointe Specific Plan Project will provide new development that will generate revenues for the City in the years and decades ahead. Once construction is completed, the facility will annually generate additional City revenue. This increased revenue from the development will be driven by sales tax, property tax, property tax in lieu of Motor Vehicle Licensing Fees, hotel lodging tax, business license fees and other tax, license, permit charges and fees as documented in the Fiscal Impact Analysis (Exhibit A).**

   The Project would have a positive fiscal impact on the City of Beaumont through construction and development of the Project, as well as throughout the life of the Project. The construction and development of the site would produce an economic stimulus as a result of the payment of one-time fees and recurring revenues. An Economic and Fiscal Impact Analysis was prepared for the Project in August 2023 by Development Planning & Financing Group (see Exhibit A.1). At Project buildout, the Project is expected to generate approximately $2,092,151 per year in property tax revenue (of which the City will receive approximately $523,038 per year) and $1,476,082 in Property Taxes In lieu of Motor Vehicle License Fee (MVLF). The hotel within the Project will generate approximately $547,500 per year in transient occupancy tax for the City, and $453,000 in annual sales tax to the City from the commercial components of the Project. This amounts to over $3.5 million in gross recurring annual revenues and over $1.5 million in net recurring annual general fund surplus paid to the City. Over a twenty-year period after Project buildout, assuming a 1% growth per year in Transient Occupancy Tax Revenue and a 2% growth per year for all other revenue categories, the Project is anticipated to generate $85,113,976 in total tax revenues to the City.

In summary, as documented in the Fiscal Impact Analysis (Exhibit A):

1. Property is anticipated to have a total assessed value of approximately $1.56 Billion at build-out. (Appendix B, Table 3)

2. The Project is anticipated to increase the City's job base by 22%. (City currently has approximately 24,300 employees. The Project is anticipated to create 5,451 new employees.) (Table 3)

3. The Project is anticipated to generate an annual General Plan surplus of $1.6MM at build-out. (At build-out, the Project is projected to generate $3.6MM of recurring annual revenue to the City. The Projected is anticipated to require $2.0MM of recurring annual expenditure to the City.) (Table 2)

4. The Project is anticipated to increase key recurring tax revenue to the City by 16%. (For the City's Adopted Budget for fiscal year 2023/2024, the City expects to receive $15.6MM total per year in Secured Property Tax, Motor Vehicle In-Lieu Taxes, and Transient Occupancy Tax – Appendix B, Table 8. The Project is anticipated to contribute an additional $2.5MM per year in these categories – Table 2)

5. The Project is anticipated to increase demand on City services by only approximately 4.0%. (The City currently has demand on City services from approximately 68,890 Equivalent Residents. The Project will increase demand on City services by approximately 2,725 Equivalent Residents.) (Table 3).

6. The Beaumont Pointe Specific Plan Project will help meet the existing demand for high-quality, large-scale, Class A high cube warehouse/distribution centers within a geographic area that allows for access to a multi-modal transportation system.

Regional access to the Project site is provided via the SR-60 Freeway at the Potrero Boulevard interchange, approximately 1.3 miles to the east, and the I-10 Freeway at SR-79, approximately 3.3 miles to the east. The Project site is approximately 2.5 miles west of the junction of SR-60 Freeway and I-10, 3 miles west from the westbound on-ramp of the I-10 Freeway at Oak Valley Parkway via Potrero Boulevard, and 14 miles east of Interstate 215 (I-215). The Project will help to fulfill southern California's unconstrained demand for warehousing space (i.e., demand without accounting for the amount of suitably zoned land for future development), which is estimated to be approximately 1.81 billion square feet by the year 2040, as projected by SCAG[14]. In doing so, the Project will further diversify the City's economy and secure the City's position in the regional, State, and international marketplace.

[14] SCAG. (April 2018). Southern California Association of Governments Industrial Warehousing Supply. Available at: https://scag.ca.gov/sites/main/files/file-attachments/industrial_warehousing_report_-_revised_2018.pdf?1605989650

7. The Beaumont Pointe Specific Plan Project will fulfill a need in the City and region with wellness-based retail, including entertainment, recreation, hospitality, and restaurants.

The City currently lacks diversity in its retail market and desires to expand and diversify its retail and commercial sectors. Incorporation of wellness-based retail, including entertainment, recreation, hospitality, and restaurants would diversify the City's current retail and commercial sectors consistent with City General Plan Goals 5.1, 5.5, 5.7, and 5.8[15] by establishing an active setting that would provide a gathering place for the community and a variety of retail, recreation and restaurants uses not currently available in the City. This would diversify and expand available commercial services for City residents, could attract visitors traveling along the SR-60 corridor, and would also diversify the City's tax revenues, stabilizing the City's revenues by expanding sources of revenue generation.

Planning Areas 1 and 2 totaling 30.2 acres are designated General Commercial. This area is intended to provide an outdoor retail experience with a variety of wellness activities for all ages unique to the City and region. "The Experience at Beaumont Pointe," includes a combination of hospitality, restaurant, and recreation commercial uses and is designed to be a multi-generational, regional destination focusing on entertainment, physical activity and wellness-based retail. A tree-lined "Promenade" featuring water features, outdoor living room seating areas, and shading devices serves as the organizing spine of the Project. The "Promenade" takes users from the hotel at one end, through each area to the next, past the "Activities Park," to its termination at a large climbing wall that has both indoor and outdoor climbing experiences. The "Activities Park" serves as the focal point of "The Experience at Beaumont Pointe," and consists of landscaping, seating, video screen walls, and programming provided by the commercial developer for wellness activities such as yoga, movies on the lawn, and "biergarten" games. The retail-use buildings feature large façade openings with large doors, to allow a dynamic interaction of indoor / outdoor activities and varied uses to spill out onto the "Promenade" and park areas. Potential activity and recreation-based retail uses proposed includes indoor go-karting, stationary surf wave pools, indoor trampoline parks, ninja obstacle course gyms, climbing gyms, training facilities, and various athletic and wellness studios. A cluster of restaurants with patio dining face the "Activities Park" and shelter it from the parking areas. The spaces between the restaurants serve as seating areas and portals into the project from the parking field.

8. The Beaumont Pointe Specific Plan Project will provide significant job opportunities while providing additional infrastructure benefits to the City and local area in an efficient and cost-effective manner.

The Project is estimated to generate approximately 5,456 permanent jobs which would represent approximately 34% of SCAG's forecast. By contributing new employment to a

[15] Goal 5.1: A dynamic local economy that attracts diverse business and investment. Goal 5.5: A community with vibrant shopping areas. Goal 5.7: A unique destination that celebrates Beaumont's location, history, and community. Goal 5.8: A financially stable community.

housing-rich area, the Project will contribute to an improved jobs-housing ratio for the City and would be within the anticipated business growth projections of the City.

The Project would construct four main roadways for on-site circulation—4th Street, Jack Rabbit Trail, Entertainment Avenue, and Industrial Way. All roadways will be public right of way unless otherwise indicated in the Beaumont Pointe Specific Plan; Entertainment Avenue and Industrial Way are private roads. The precise location of roadways and access points identified in the DEIR are considered conceptual in that they may be modified to meet the requirements of the City of Beaumont Public Works Department and to address final grading requirements.

The Project Applicant would be required to pay Transportation Uniform Mitigation Fees (TUMF), Development Impact Fees (DIF), and fair share improvement fees that the City would use to ensure the implementation of roadway improvements in the area in order to minimize traffic congestion. In addition, these fees would fund additional traffic improvements to General Plan roadways in the Project area and would go toward the maintenance of roadway infrastructure in the Project area.

The Project would include domestic and recycled water infrastructure, sewer lines, lift station, upgrading Hidden Canyon Lift Station, storm drain infrastructure, and dry utilities which would be installed in compliance with the requirements of the respective utility providers and consistent with final plans approved by the utility providers.

The Project would provide over $2 million in fair-share contributions toward infrastructure improvements.

9. The Beaumont Pointe Specific Plan Project will provide other Community Benefits.

Through the Project's Development Agreement, the Project Applicant will be providing additional Community Benefits supporting the surrounding community, including but not limited to the following:

- Full cost of build out and dedication of 4th Street and Jack Rabbit Trail on the Project site as new public roads.

- Expansion of the sewer lift station at 4th Street and Potrero Boulevard to increase capacity required to serve the Project, providing capacity for the Project and wet well available to the City.

- Payment of TUMF fees, school fees, MSHCP fees, Development Fees, and utility connection fees subject to fee credits.

- Construction of Offsite Traffic Improvements and/or payment of fair share contributions towards traffic improvements as described on Exhibit "D" of the Development Agreement.

- Conveyance of 230.82 acres of land, including 152.42 acres on the Project site (Planning Area 10) and 78.40 acres of land offsite, to RCA or to another conservation agency or non-profit organization with the approval of RCA to further wildlife interests, providing access for wildlife movement to Caltrans constructed and proposed wildlife undercrossings along the SR-60 Freeway abutting the northern Project boundary and construction of fencing around property perimeter to support the function of Proposed Core 3 of the MSHCP, consistent with the MSHCP goals of providing live-in habitat and facilitating movement of wildlife.

- Increase in local tax revenues including sales and property taxes and transit occupancy taxes.

- Increase in employment opportunities in local area.

10. The Beaumont Pointe Specific Plan Project development will facilitate the City's goal of sustainable development by being energy and water efficient in conformance with the City's Climate Action Plan.

Development within the Specific Plan will be energy efficient in conformance with the criteria from the City of Beaumont Climate Action Plan. Because technological and methodological specifications in energy efficiency criteria could become obsolete in the future due to advancement over time, the Project may implement new technologies and methodologies if they achieve at least as much environmental protection and do not result in new or greater significant environmental impacts than the technologies or methodologies specified in the following criteria:

1. Energy Efficient Structures
   a. Enhanced Insulation shall be provided via methods such as rigid wall insulation R-13, roof/attic R-38, etc.
   b. Greatly Enhanced Window Insulation with 0.28 or less U-factor, 0.22 or less SHGC, etc. shall be provided.
   c. Modest Cool Roofs with CRRC Rated 0.15 aged solar reflectance, 0.75 thermal emittance, etc. shall be provided.
   d. 20% of the power needs of each building shall be provided by Solar Photovoltaic panels or wind, installed on buildings or in collective arrangements.

2. Energy Efficient Heating and Cooling (HVAC)
   a. Distribution loss reduction with inspection shall be provided via HERS Verified Duct Leakage or Equivalent.

b. Improved Efficiency HVAC (EER 14/78% AFUE or 8 HSPF) shall be provided.

3. Energy Efficient Potable Water
   a. Improved Efficiency Water Heater (0.675 Energy Factor) shall be provided.
   b. Water Efficient Showerheads (2.0 gpm) shall be provided.
   c. Water Efficient Toilets/Urinals (1.5 gpm) shall be provided.
   d. Water Efficient Faucets (1.28 gpm) shall be provided.
   e. Water Efficient Dishwasher (20% water savings) shall be provided.

4. Energy Efficient Appliances
   a. Efficient Lights shall be provided.
   b. Energy Star Commercial Refrigerators and Commercial Dishwashers shall be provided.

5. Energy Efficient Landscaping
   a. Only low water using plants shall be used.
   b. Weather based irrigation control systems combined with drip irrigation (demonstrate 20% reduced water) shall be used.
   c. Graywater (purple pipe) irrigation system shall be provided on site.

6. Energy Efficient Transportation
   a. A Car/vanpool program with preferred parking shall be provided within BEAUMONT POINTE.
   b. Bike lockers and secure racks shall be provided.
   c. Development shall provide reserved preferential parking spaces for car-share, carpool, and ultra-low or zero emission vehicles.
   d. EV charging stations shall be installed in employee garages/parking areas.

11. The Beaumont Pointe Specific Plan Project will reduce the overall risk of wildfire spread on and off site.

The Project site is undeveloped, disturbed, vacant, and has hills in the south which contain existing native and non-native vegetation that would be susceptible to wildfire. The Project site is designated within Very High Fire Hazard Severity Zone (VHFHSZ) and High Fire Hazard Severity Zone (HFHSZ) within a State Responsibility Area (SRA) by the Riverside County General Plan and CalFire.

The Project includes a Fire Protection Plan (FPP) to ensure the protection of all development within Project from fire hazards and to reduce the overall risk of wildfire spreading off site with implementation of fire safety requirements, defensible space, and vegetation management. The Project site improvements are designed to facilitate emergency apparatus and personnel access throughout the Project site. Driveway and road improvements with fire apparatus turnarounds provide access to the sides of every building. Water availability and flow will be

consistent with requirements including fire flow and hydrant distribution required by local and state codes. These features along with the ignition resistance of all buildings, the interior sprinklers, and the pre-planning, training and awareness will assist responding firefighters through prevention, protection, and suppression capabilities. Buildings will be constructed in conformance with Riverside County codes for building within Wildland Urban Interface (WUI) areas that focus on preventing structure ignition from heat, flame, and burning embers. As indicated in the FPP, all the existing fuel on the Project site and within fuel modification zone (FMZ) areas will be converted into hardscape and or partially or totally replaced with more appropriately spaced drought-tolerant, fire-resistant plants. Fuel conditions will be addressed through various vegetation management techniques, including FMZs to protect natural resources from fires in developed areas and to provide a managed area where fire spread is not facilitated toward the Project or away from the Project into wildland areas to lower the probability of burning and the potential fire size. As a result, the risk of a structure being destroyed, whether from a fire from with the development or outside the development, is significantly lower when defensible space is implemented. Fuel modification areas and fuel maintenance zone will also be implemented to minimizing the potential for an on-site fire spreading offsite. Specifically, in addition to a 100-foot Fuel Modification Area (FMA), the Project will provide a 20-foot wide fuel maintenance zone around the perimeter of the Project's wildland exposures. The fuel maintenance zone will be landscaped and irrigated to the pad edge, extending the protections provided by the FMA.

The Project would construct four main roadways for on-site circulation—4th Street, Jack Rabbit Trail, Entertainment Avenue, and Industrial Way. The roadways would increase access for first responses to the area. Additionally, the Project includes a looped perimeter road system (4th Street & Industrial Way) along with a phased series of 40' wide Interim Fire Access Loop Connections, to ensure adequate fire-fighting and emergency access, during construction and operation of the site. An emergency secondary access to and from the site is provided from State Highway 60 via Jack Rabbit Trail, where an emergency access gate will be installed to provide access for firefighting and for evacuation. The emergency access gate will meet all fire code requirements including an automatic gate opener with battery backup and solar charging. Finally, the Project buildings will be constructed of concrete which is non-combustible and highly resistant to heat.

In conclusion, the City finds after consideration of the FEIR and the evidence in the record, that each of the specific overriding economic, legal, social, technological and other benefits of the Project as set out above independently and collectively outweighs the identified significant adverse environmental impacts and is an overriding consideration warranting approval of the Project. The City further finds that each of the individual benefits discussed above outweigh the unavoidable adverse environmental effects identified in the EIR and, therefore, finds those impacts to be acceptable. The City further finds that each of the benefits listed above, standing alone, is sufficient justification for the City Council to override these unavoidable environmental impacts.

The reasons for approval cited above are not unitary, so that even if a court were to conclude that not every reason is supported by substantial evidence, the City determines that each remaining reason

standing alone would be sufficient to justify approval of the Project. The substantial evidence supporting the various benefits can be found in the FEIR and the CEQA Findings, above, which are incorporated by reference into the documents found in the administrative record. On the basis of the Findings made in Sections 3.0 through 8.0 included herewith, and the substantial evidence in the whole record of this proceeding, it is specifically found that there are significant benefits of the Project in spite of the unavoidable significant impacts. It is further found that, as part of the process of obtaining Project approval, all significant effects on the environment from implementation of the Project have been eliminated or substantially lessened where feasible. Any remaining significant effects on the environment found to be unavoidable are found to be acceptable due to the above-discussed specific overriding economic, technical, legal, social and other considerations.

10.0 ADDITIONAL FACTS ON RECORD

10.1 CUSTODIAN OF RECORD

The documents and materials that constitute the record of proceedings on which these findings have been based are located at the City of Beaumont, 550 East 6th Street, CA 92223. The custodian for these records is Carole L. Kendrick, Planning Manager. This information is provided in compliance with Public Resources Code Section 21081.6.

Exhibit A
Beaumont Pointe Specific Plan
Fiscal Impact Analysis

Beaumont Pointe Specific Plan
FISCAL IMPACT ANALYSIS
Prepared for the
JRT BP1, LLC

August 2023

Prepared By:

DPFG
DEVELOPMENT PLANNING & FINANCING GROUP

Beaumont Pointe Business Park
FISCAL IMPACT ANALYSIS
Table of Contents

Page

1. Purpose of Fiscal Impact Analysis

Representatives of JRT BP1, LLC have requested that DPFG, LLC. ("DPFG") prepare a Fiscal Impact Analysis ("FIA") to estimate the annual recurring net fiscal impact that the Beaumont Pointe Specific Plan ("Project") is anticipated to have on the City of Beaumont, California's ("City") General Fund at the Project's buildout, as well as its cumulative impact in the 20 years after buildout, if it were to be annexed into the City. Please note that the FIA is subject to limiting conditions outlined in this Report.

2. Project Description

The proposed Project is an employment and retail entertainment development which at buildout is anticipated to include approximately 246,000 square feet of general commercial uses, a 125-room hotel, and approximately 4,995,000 square feet of industrial and warehouse uses in five buildings ranging in size from 600,000 and 1,400,000 square feet.

Beaumont Pointe Specific Plan (SP2019-0003)

The Project includes approximately 539.9 gross acres that are predominantly located just outside the City of Beaumont in the Unincorporated Area of the County of Riverside, between Moreno Valley and Beaumont, adjacent to Jack Rabbit Trail and below SR-60. The Project is within the Beaumont Pointe Specific Plan, which provides for the development of up to 539.9 acres comprising of 30.2 acres of General Commercial uses, approximately 232.6 acres of Industrial uses, and approximately 277.1 acres of Open Space. It is estimated that the Project will include an additional approximately 4,995,000 square feet of industrial uses, approximately 246,000 square feet of general commercial uses, and a 125-room hotel upon buildout. A summary of the Project's land use assumptions is shown on the next page in **Table-1**, while the site plan is included in **Appendix A-1**.

Table-1
Beaumont Pointe Land Use Assumptions

Industrial			
Probable Tenant Type	**Bldg. SF (a)**	**Estimated Assessed Value per SF (b)**	**Total Assessed Value**
Industrial (Self Storage) - PA 3	35,000	$ 295	$ 10,325,000
Industrial Building 1 - PA 4	1,379,000	295	406,805,000
Industrial Building 2 - PA 5	981,000	295	289,395,000
Industrial Building 3 - PA 6	700,000	295	206,500,000
Industrial Building 4 - PA 7	600,000	295	177,000,000
Industrial Building 5 - PA 8	1,300,000	295	383,500,000
Subtotal Industrial	**4,995,000**	**$ 295**	**$ 1,473,525,000**

Commercial			
Probable Tenant Type	**Bldg. SF (a)**	**Estimated Assessed Value per SF (b)**	**Total Assessed Value**
General Commercial	216,000	227	49,032,000
Restaurant	30,000	227	6,810,000
Subtotal Commercial Retail	**246,000**	**$ 227**	**$ 55,842,000**

Hospitality			
Description	**Number of Rooms**	**Estimated Assessed Value per Room**	**Total Assessed Value**
Hotel	125	248,000	31,000,000

Total Project Assessed Value	**$ 1,560,367,000**

Footnotes:
(a) Per Developer and Beaumont Point Specific Plan. Represents maximum allowable building square footage.
(b) Per Developer.

3. Executive Summary

It is estimated that the Project, at buildout, if annexed into the City, would generate a positive annual recurring net fiscal impact to the City General Fund of **$1,596,439**. It is estimated that the Project will generate a positive net fiscal impact to the City General Fund of **$24,850,643** over the 20 years after buildout as detailed in **Table-2** on the following page.

Table-2

Beaumont Pointe Net Fiscal Impact Analysis Summary

Fiscal Impact Summary			
Recurring Annual Revenues:	Buildout (a)	Buildout + 20 Yrs (b)	
Property Taxes	$ 523,038	$ 12,708,439	Table 5
Property Taxes In Lieu of MVLF	1,476,082	35,864,922	Table 6
Transient Occupancy Taxes	547,500	12,055,405	Table 7
On-Site Sales Tax Revenue	453,000	11,006,709	Table 8
Other Recurring Revenues	554,731	13,478,502	Table 9
Total Annual Revenues	**$ 3,554,351**	**$ 85,113,976**	
Recurring Annual Expenditures:			
Non-Departmental	$ -	$ -	Table 10
Administration	226,753	6,092,928	Table 10
Community Development	77,875	2,092,538	Table 10
Community Services	167,679	4,505,604	Table 10
Public Safety	1,235,317	40,846,946	Table 10
Public Works	250,287	6,725,317	Table 10
Total Annual Expenditures:	**$ 1,957,912**	**$ 60,263,333**	
Annual General Fund Surplus/(Deficit)	**$ 1,596,439**	**$ 24,850,643**	

Footnotes:
(a) Anticipated revenues are shown in 2023-2024 dollars.
(b) 20 year projection assumes the sum of all 20 years assuming a 1% growth per year in Transient Occupancy Tax Revenue and a 2% growth per year for all other revenue categories for 20 years. Expenditures assume a 5% Public Safety escalation with the remaining expenditures increasing at 3% per year for 20 years. Escalation factors per City of Beaumont.

Using the same escalation assumptions in the Buildout + 20 Yrs summary in Table 2 an annual time-phased analysis was prepared consistent with the term of the City forecast of sixteen years. This analysis includes the anticipated absorption of the project over 5 years and is included in **Appendix C.**

4. FIA Recurring Revenues

The revenue estimates in this section utilize the Equivalent Resident approach, with the exception of property and sales taxes which are estimated from the number of commercial square feet, industrial square feet, and number of hotel rooms developed, as shown in detail in **Appendix B**.

4.1 Property Taxes

In addition to the other ad valorem chargers imposed by various local agencies, landowners in the State of California are required to pay annual property taxes of 1% on the assessed value of their

property pursuant to Proposition 13. Each county in California is divided into tax rate areas ("TRA"). After the basic 1% property tax is collected by the County, the tax is allocated to various local agencies based on their respective share of the basic tax within the applicable TRA. Due to the Project being located within multiple TRA's, this analysis calculates a weighted average percentage of the share of the basic tax that would be allocated to the City if the Project were to be annexed. Property taxes are estimated by applying estimated assessed values to the number of commercial square feet, industrial square feet, and hotel rooms built within the Project. If it were to be annexed into the City, the Project is estimated to generate **$523,038** in annual recurring revenues at buildout and **$12,708,439** in cumulative annual revenues during the 20 years after buildout as shown in **Appendix B Table 4.**

4.2 Property Taxes In-Lieu of MVLF

In May 2004, Governor Schwarzenegger proposed a swap of city and county VLF revenue for additional property tax share as part of a budget agreement between the State and local governments. The swap was included in the 2004 budget package. Under this legislation, property tax in-lieu of VLF is allocated to Cities and Counties pursuant to a complex formula involving each agencies relative share of assessed value. The property tax in-lieu of VLF revenue that will be generated by the Project can be estimated by determining the (i) percentage growth in the total assessed value of the City attributable to the Project and multiplying by (ii) the property tax in-lieu of VLF revenue of $6,762,693 expected to be received by the City in FY 2023-24 per the City Budget. Based on these calculations, the Project is anticipated to generate **$1,476,082** in annual recurring revenue at buildout and **$35,864,922** in cumulative annual revenues during the 20 years after buildout, as shown in **Appendix B Table 5.**

4.3 Sales Taxes

4.3.1 Transient Occupancy Taxes

Lodging Taxes are estimated from the number of hotel rooms built within the Project. Lodging tax revenues of 10.0% on all hotel rooms rented within the Project are collected by the City. This revenue estimate utilizes a 125-room hotel, an average hotel room rate of $160 and an occupancy rate of 75.0%. Based on the total hotel lodging taxes, if it were to be annexed into the City, the Project is estimated to generate **$547,500** in annual recurring revenue at buildout and **$12,055,405** in cumulative annual revenues during the 20 years after buildout as shown in **Appendix B Table 6**.

4.3.2 Commercial Retail Sales Taxes

Commercial retail sales taxes are estimated from the number of square feet of retail space built within the Project. If it were to be annexed into the City, the Project is estimated to generate **$453,000** in annual recurring revenue at buildout. If it were to be annexed into the City, the Project is anticipated to generate **$11,006,709** in cumulative annual revenue during the 20 years after buildout as shown in **Appendix B Table 7**.

4.4 Other Revenues

The City receives revenues from other budgetary items for which case studies were not conducted upon. These revenues are in the form of Other Taxes, Licenses, Permits, and Fees, Charges for

Service, Fines and Forfeitures, Cost Recovery, and Miscellaneous Revenue. Other Revenues are estimated using the estimated Project Equivalent Residents of 2,622. The Project is estimated to generate **$554,731** in annual recurring revenue at buildout and **$13,478,502** in cumulative annual revenues during the 20 years after buildout as shown in **Appendix Table 8**.

5. FIA Recurring Costs

The cost estimates in this section utilize the Equivalent Resident approach, as shown in detail in **Appendix B**.

5.1 Non Departmental

Transfers Out are the only expense that makes up the Non-Departmental cost category. Costs are estimated using a Per Capita & 50% Employee Multiplier. This analysis assumes that 0% of the non-Departmental costs for Transfers Out are estimated to be impacted by the Project. The Project is estimated to generate **$0** in annual recurring costs at buildout and **$0** in cumulative annual costs during the 20 years after buildout as shown in **Appendix B, Table 9**.

5.2 Administration

The Administration cost category includes all expenses incurred by the City for Administrative services, City Council, City Clerk, Administration, Communication, IT Department, Risk and Human Resources, Legal services, and Finance and Budgeting. Costs are estimated by using a Per Capita & 50% Employee Multiplier, and 50.0% of the budgeted costs are estimated to be impacted by the Project. The Project is estimated to generate **$226,753** in annual recurring costs at buildout and **$6,092,928** in cumulative annual costs during the 20 years after buildout as shown in **Appendix B, Table 9**.

5.3 Community Development

The Community Development cost category includes all expenses related to the Planning Department, Community Enhancement, Building and Safety, and Economic Development, and is responsible for administering the City's planning and construction and code regulation programs. Costs are estimated using a Per Capita & 50% Employee Multiplier, and 50.0% of the budgeted costs are estimated to be impacted by the Project. The Project is estimated to generate **$77,875** in annual recurring costs at buildout and **$2,092,538** in cumulative annual costs during the 20 years after buildout as shown in **Appendix B, Table 9**.

5.4 Community Services

The Community Services cost category includes expenses related to maintenance of parks, trails, and open space, maintenance of City owned facilities, and manages recreational operations and programs. Costs are estimated using a Per Capita & 50% Employee Multiplier, and 50.0% of the budgeted costs are estimated to be impacted by the Project. The Project is estimated to generate **$167,679** in annual recurring costs at buildout and **$4,505,604** in cumulative annual costs during the 20 years after buildout as shown in **Appendix B, Table 9**.

5.5 Public Safety

The Public Safety cost category includes expenses related to providing quality law enforcement, Fire Protection, animal control, and emergency management services in the most effective and

efficient manner possible. A majority of the costs are related to personnel expenses and operating expenses. This analysis has also modified the Fire costs from an original budgeted amount of $6,820,202 to a total of $11,396,728 which includes an anticipated $4,576,526 for a fire contract to operate an additional fire station. Costs are estimated using a Per Capita & 50% Employee Multiplier, and 100% of the budgeted costs are estimated to be impacted by the Project. The Project is estimated to generate **$1,235,317** in annual recurring costs at buildout and **$40,846,946** in cumulative annual costs during the 20 years after buildout as shown in **Appendix B, Table 9**.

5.6 Public Works

The Public Works cost category includes expenses related to the Public Works Department and the Street Maintenance Department for providing cost effective infrastructure and services to promote public health. Costs are estimated using a Per Capita & 50% Employee Multiplier, and 100.0% of the budgeted costs are estimated to be impacted by the Project. The Project is estimated to generate **$250,287** in annual recurring costs at buildout and **$6,725,317** in cumulative annual costs during the 20 years after buildout as shown in **Appendix B, Table 9**.

6. Limiting Conditions

This study prepared by DPFG, LLC is subject to the following considerations and limiting conditions.

- It is our understanding that this Report is for the client's due diligence and other planning purposes. Neither our Report, nor its contents, nor any of our work were intended to be included and, therefore, may not be referred to or quoted in whole or in part, in any registration statement, prospectus, public filing, private offering memorandum, or loan agreement without our prior written approval. This report is intended to be read and used as a whole and not in parts.

- The reported recommendation(s) represent the considered judgment of DPFG, LLC based on the facts, analyses and methodologies described in the Report.

- Except as specifically stated to the contrary, this Report will not give consideration to the following matters to the extent they exist: (i) matters of a legal nature, including issues of legal title and compliance with federal, state and local laws and ordinances; and (ii) environmental and engineering issues and the costs associated with their correction. The user of this Report will be responsible for making his/her own determination about the impact, if any, of these matters. This Report has not evaluated the feasibility or marketability of any site for planned uses.

- The Report does not consider all of the costs to local governments associated with providing services such as emergency services to the development. Such analysis is beyond the scope of this Report.

- The analysis is based on the current tax structure and rates imposed by the State, County and City. Changes in those rates would alter the findings of this Report. All dollar amounts are stated in 2023 dollars and, unless indicated, do not take into account the effects of inflation. The results of this Report are meant to reflect a typical year based on averages. While dollar figures are expressed in current dollars, the results from year to year will vary based on events held at the development generated throughout the year.

- Our analysis is based on currently available information and estimates and assumptions. Such estimates and assumptions are subject to uncertainty and variation. Some assumptions inevitably will not materialize, and unanticipated events and circumstances may occur; therefore, the actual results achieved may vary materially from the forecasted results. The assumptions disclosed in this Report are those that are believed to be significant to the estimates of results.

7. General Sources of Information and FIA Methodology

Annual recurring revenues/costs were calculated using the City of Beaumont's Fiscal Year 2024 Adopted Budget ("Budget"), as this was the most recent budget available. Annual recurring revenue/cost impacts to the City General Fund are estimated in 2023 dollars, and by using primarily either per person ("Per Capita") or equivalent resident ("Equivalent Resident") methodologies. In some simpler instances the FIA estimates impacts based on the number of Project commercial square feet, industrial square feet, or number of hotel rooms.

The Equivalent Resident approach is used for annual recurring revenues/costs that are impacted by the number of Project employees. This approach uses the Budget's revenues/costs, as well as the City's number of residents plus 50.0% of the employees in 2023 to establish an Equivalent Resident Factor. The Equivalent Resident Factor is then applied to the number of Project residents plus 50.0% of Project employees to estimate annual recurring fiscal impacts. 50.0% is estimated to be the percentage of Project employees that will live and shop in the City.

These approaches are summarized on **Table-3**.

Table-3
Beaumont Pointe Assumptions Summary

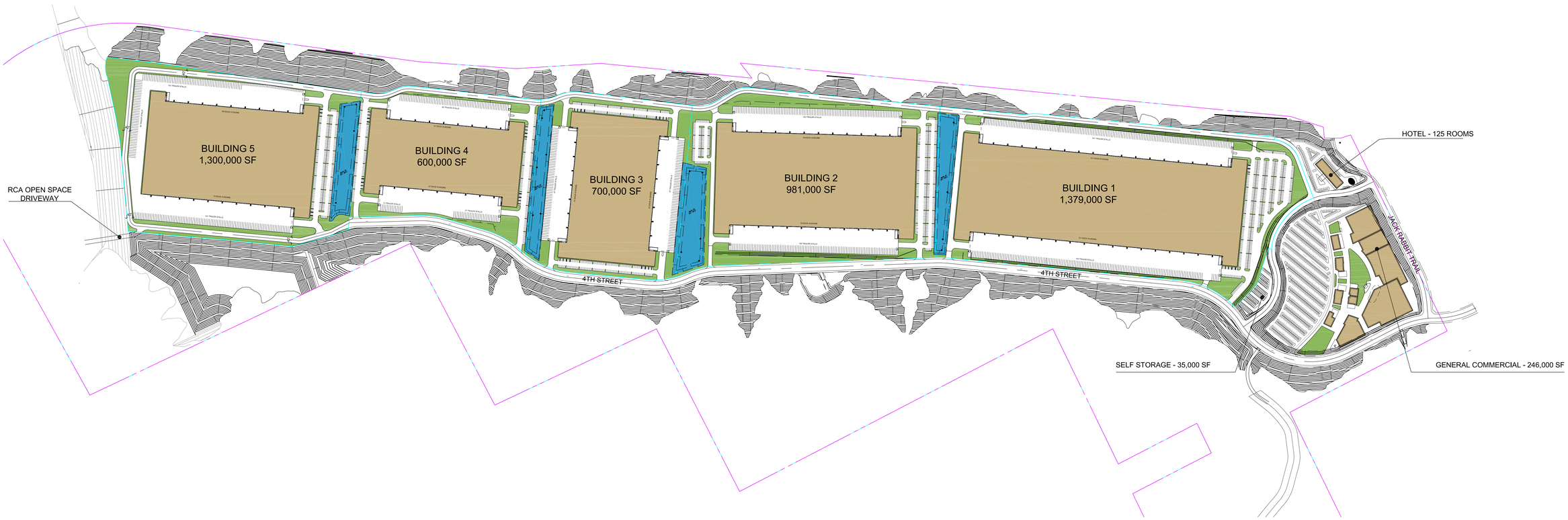
	City	Project
Per Capita (a)	56,590	-
Per Employee (b)	24,600	5,451
Per Capita & 50% Employee	68,890	2,725
Case Study	-	-
N/A	-	-

Footnotes:
(a) Population data for the City of Beaumont per State of California Department of Finance E-5 Population and Housing Estimates for January 1, 2023.
(b) Employee data per the State of California Employment Development Department Monthly Labor Force Data for Cities and Census Designated Places - May 2023.

Information used in preparing the FIA was obtained from the following sources: (1) City of Beaumont Fiscal Year 2024 Adopted Budget; (2) Beaumont Pointe Specific Plan; (3) U.S. Census

Bureau population, household, employment, income, and other demographic data; (4) City Revenue Division taxing data; (5) County Assessor property valuations; (6) U.S. Bureau of Labor Statistics household and retail expenditures; (7) City Property Tax Division; (8) CBRE property occupancies and valuations; (9) Riverside County General Plan; (10) City of Beaumont Economic Development Department; (11) Landvision; (12) California Department of Transportation; (13) April 19, 1982 City of Beaumont Resolution 1982-24; and (14) JRT BP1, LLC ("Developer").

Appendix A



A CONCEPTUAL SITE PLAN
SCALE: 1" = 300'

PROJECT
BEAUMONT POINTE
BEAUMONT, CA

JPR SUBMITTAL
SITE PLAN

HERDMAN
ARCHITECTURE + DESIGN

100 Bayview Circle, Suite 100
Newport Beach, CA 92660
www.Herdman-ad.com
714.389.2800
info@Herdman-ad.com

A19-2104
06.15.2023

NORTH

CONCEPTUAL
SITE PLAN

Appendix B

Table 1
Fiscal Impact Analysis Summary
Beaumont Pointe

Fiscal Impact Summary			
Recurring Annual Revenues:	Buildout (a)	Buildout + 20 Yrs (b)	
Property Taxes	$ 523,038	$ 12,708,439	Table 4
Property Taxes In Lieu of MVLF	1,476,082	35,864,922	Table 5
Transient Occupancy Taxes	547,500	12,055,405	Table 6
On-Site Sales Tax Revenue	453,000	11,006,709	Table 7
Other Recurring Revenues	554,731	13,478,502	Table 8
Total Annual Revenues	**$ 3,554,351**	**$ 85,113,976**	
Recurring Annual Expenditures:			
Non-Departmental	$ -	$ -	Table 9
Administration	226,753	6,092,928	Table 9
Community Development	77,875	2,092,538	Table 9
Community Services	167,679	4,505,604	Table 9
Public Safety	1,235,317	40,846,946	Table 9
Public Works	250,287	6,725,317	Table 9
Total Annual Expenditures:	**$ 1,957,912**	**$ 60,263,333**	
Annual General Fund Surplus/(Deficit)	**$ 1,596,439**	**$ 24,850,643**	

Footnotes:
(a) Anticipated revenues are shown in 2023-2024 dollars.
(b) 20 year projection assumes the sum of all 20 years assuming a 1% growth per year in Transient Occupancy Tax Revenue and a 2% growth per year for all other revenue categories for 20 years. Expenditures assume a 5% Public Safety escalation with the remaining expenditures increasing at 3% per year for 20 years. Escalation factors per City of Beaumont.

Table 2
Fiscal Revenue Analysis Absorption Summary
Beaumont Pointe

Anticipated Industrial Absorption							
Fiscal Year	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total
Industrial (Self Storage) - PA 3	-	-	-	-	35,000	-	35,000
Industrial Building 1 - PA 4	1,379,000	-	-	-	-	-	1,379,000
Industrial Building 2 - PA 5	-	-	981,000	-	-	-	981,000
Industrial Building 3 - PA 6	-	-	700,000	-	-	-	700,000
Industrial Building 4 - PA 7	-	-	-	-	600,000	-	600,000
Industrial Building 5 - PA 8	-	-	-	-	1,300,000	-	1,300,000
General Commercial	-	-	-	-	216,000	-	216,000
Restaurant	-	-	-	-	30,000	-	30,000
	1,379,000	-	1,681,000	-	2,181,000	-	5,241,000

Anticipated Hotel Absorption							
Fiscal Year	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Hotel Rooms	-	-	-	-	125	-	125

Anticipated Revenue (a)							
Fiscal Year	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	Total
Property Taxes	137,620	-	167,759	-	217,658	-	523,038
Transient Occupancy Taxes	-	-	-	-	547,500	-	547,500
Property Taxes In Lieu of MVLF	388,383	-	473,439	-	614,260	-	1,476,082
On-Site Sales Tax Revenue	-	-	-	-	453,000	-	453,000
	526,004	-	641,198	-	1,832,418	-	2,999,620

Footnotes:
(a) Anticipated revenue is in 2022/23 dollars.

Table 3
Land Use and Assessed Value Assumptions
Beaumont Pointe

Industrial			
Probable Tenant Type	**Bldg. SF (a)**	**Estimated Assessed Value per SF (b)**	**Total Assessed Value**
Industrial (Self Storage) - PA 3	35,000	$ 295	$ 10,325,000
Industrial Building 1 - PA 4	1,379,000	295	406,805,000
Industrial Building 2 - PA 5	981,000	295	289,395,000
Industrial Building 3 - PA 6	700,000	295	206,500,000
Industrial Building 4 - PA 7	600,000	295	177,000,000
Industrial Building 5 - PA 8	1,300,000	295	383,500,000
Subtotal Industrial	**4,995,000**	**$ 295**	**$ 1,473,525,000**

Commercial			
Probable Tenant Type	**Bldg. SF (a)**	**Estimated Assessed Value per SF (b)**	**Total Assessed Value**
General Commercial	216,000	227	49,032,000
Restaurant	30,000	227	6,810,000
Subtotal Commercial Retail	**246,000**	**$ 227**	**$ 55,842,000**

Hospitality			
Description	**Number of Rooms**	**Estimated Assessed Value per Room**	**Total Assessed Value**
Hotel	125	248,000	31,000,000

Total Project Assessed Value	**$ 1,560,367,000**

Footnotes:

(a) Per Developer and Beaumont Point Specific Plan. Represents maximum allowable building square footage.
(b) Per Developer.

Table 4
Post-ERAF Share of the Basic Tax Calculation
Beaumont Pointe

Agency	TRA (c) 56-006	56-007	56-016	56-017	91-010	Wtd. Avg. of TRAs (a), (b)
General	**12.84501768%**	**13.85833051%**	**13.58799159%**	**13.09636799%**	**14.84232910%**	**13.408067031%**
County Free Library	1.31177694%	1.41419586%	1.38660869%	1.33644021%	1.51460970%	1.368882514%
County Structure Fire Protection	5.36236594%	5.78104164%	5.66826846%	5.46318658%	6.19151834%	5.595805763%
Beaumont Unified School	39.01510700%	42.06127400%	41.24077100%	39.74865000%	0.00000000%	29.757937180%
San Jacinto Unified School	0.00000000%	0.00000000%	0.00000000%	0.00000000%	44.46009600%	10.812686198%
Mt San Jacinto Junior College	3.62238000%	3.90520300%	3.82902300%	3.69048600%	4.18248800%	3.780072961%
Riv. Co. Office of Education	3.73928600%	4.03123600%	3.95259800%	3.80959100%	4.31746900%	3.902067869%
Riv County Regional Park & Open Space	0.33306177%	0.34206833%	0.33539575%	0.32326118%	0.36635702%	0.341251513%
Flood Control Administration	0.21458408%	0.23133765%	0.22682508%	0.21861818%	0.24776375%	0.223925463%
Flood Control Zone 5	4.47826690%	4.82791454%	4.73373520%	4.56246498%	5.17071592%	4.673219194%
Summit Cemetery District	1.55976984%	1.68155142%	1.64874877%	1.58909566%	0.00000000%	1.189681029%
San Gorgonio Pass Mem Hospital	1.84545500%	0.00000000%	1.95073200%	0.00000000%	0.00000000%	1.246859598%
Beaumont Cherry Valley Rec & Park	3.51404580%	3.78841073%	3.71450859%	3.58011530%	0.00000000%	2.680263171%
Valley Wide Rec & Park	0.00000000%	0.00000000%	0.00000000%	0.00000000%	1.05843310%	0.257410712%
San Gorgonio Pass Water Agency DS	3.24139820%	0.00000000%	0.00000000%	3.30234126%	0.00000000%	2.212769815%
ERAF Fund	18.91748485%	18.07743632%	17.72479387%	19.27938166%	17.64822007%	18.549099989%
Total	100.000000%	100.000000%	100.000000%	100.000000%	100.000000%	100.0000%
Project Acres (c)	400.19	27.57	19.00	24.00	151.28	622.04
% of Total	64.34%	4.43%	3.05%	3.86%	24.32%	100.00%

Total County General Fund **13.4081%**

		Total
Total Assessed Value from Table 3		$ 1,560,367,000
Base 1% Ad-Valorem Tax	1.00%	$ 15,603,670
Total Property Taxes Generated	**13.4081%**	**$ 2,092,151**
City of Beaumont Share (d)	**25.0000%**	**$ 523,038**

Footnotes:

Source: Fiscal Year 2022-23 Share of the Basic Tax per Riverside County Auditor-Controller's Office, Property Tax Division.

(a) The weighted average of TRAs was calculated by the distribution of acreage among the TRAs within the Project.

(b) Shares of the basic tax that are received by the County for each TRA are highlighted in bold print.

(c) Data per LandVision.

(d) Per City of Beaumont Resolution No. 1982-24, the City is allocated 25% of the property tax revenue generated within the area to be annexed with the remaining 75% remaining with the County of Riverside.

Table 5
Property Taxes In Lieu of MVLF
Beaumont Pointe

Property Taxes In Lieu of MVLF			
FY 2023/24 In Lieu MVLF Allocation to City	$	7,649,448	(a)
FY 2022/23 City of Beaumont Assessed value		8,062,445,999	(b)
Total Project Assessed Value from Table 3		1,560,367,000	
Less: Existing Assessed Value		(4,590,000)	
Net (New) Assessed Value	$	1,555,777,000	
AV Growth from Project		19.297%	
Annual City Property Taxes In Lieu of MVLF	**$**	**1,476,082**	

Footnotes:
(a) Per City of Beaumont Annual City budget for Fiscal Year 2022-2023.
(b) Per County of Riverside Close of Roll Press Release dated July 10, 2023.

Table 6
Transient Occupancy Taxes
Beaumont Pointe

Proposed Resort Hotel			
No. of Rooms		125	
Average Daily Rate (ADR)		$ 160	(a)
Occupancy Rate (%)		75.0%	(a)
Total Annual Room Revenues		5,475,000	
Annual City Transient Occupancy Tax	**10.00%** (b)	**$ 547,500**	

Footnotes:

(a) Estimate per DPFG ADR rate research regarding hotels located within Project area dated 12/8/2022.

(b) Transient occupancy tax rate per City of Beaumont Municipal Code Chapter 3.28.030.

Table 7
On-Site Sales Tax Revenue
Beaumont Pointe

Probable Tenant Type	Bldg. SF (a)	Estimated Sales per SF (b)	Estimated % Taxable	Estimated Taxable Sales per SF	Total Estimated Taxable Sales
Commercial					
Industrial (Self Storage) - PA 3	35,000	$ -	100%	$ -	$ -
Industrial Building 1 - PA 4	1,379,000	-	100%	$ -	$ -
Industrial Building 2 - PA 5	981,000	-	100%	$ -	$ -
Industrial Building 3 - PA 6	700,000	-	100%	$ -	$ -
Industrial Building 4 - PA 7	600,000	-	100%	$ -	$ -
Industrial Building 5 - PA 8	1,300,000	-	100%	$ -	$ -
General Commercial	216,000	175	100%	175	37,800,000
Restaurant	30,000	250	100%	250	7,500,000
Total	**5,241,000**				**$ 45,300,000**
Annual Sales Tax to City				**1.00%**	**$ 453,000**

Footnotes:
(a) Per Developer.
(b) Preliminary DPFG estimates based on industry knowledge and review of various data sources in addition to Dollars & Cents of Shopping Centers (2008) by Urban Land Institute.

Table 8
Other Recurring Revenues
Beaumont Pointe

Revenue Category	City FY 2023/24 Adopted Budget (a)	Percentage Adjustment	Adjusted Budget	Multiplier	Factor	Project Equivalent Persons	Project Revenues
Taxes							
Secured Property Taxes	$ 7,569,785	100%	$ 7,569,785	Case Study	0.00	-	$ -
Unsecured Property Taxes	236,531	100%	236,531	Case Study	0.00	-	-
Property Transfer Tax	342,371	100%	342,371	Case Study	0.00	-	-
Street Light Assessment (Prop 13)	957,344	100%	957,344	Per Capita & 50% Employee	13.90	2,725.29	37,873
Sales & Use Taxes	28,374,719	100%	28,374,719	Case Study	0.00	-	-
1/2% Sales Tax - Public Safety	257,705	100%	257,705	Per Capita & 50% Employee	3.74	2,725.29	10,195
Motor Vehicle In-Lieu Taxes	7,649,448	100%	7,649,448	Case Study	0.00	-	-
Vehicle License Collection	63,324	100%	63,324	Per Capita & 50% Employee	0.92	2,725.29	2,505
Utility Users Tax	2,152,970	100%	2,152,970	Per Capita & 50% Employee	31.25	2,725.29	85,171
Transient Occupancy Tax	416,381	100%	416,381	Case Study	0.00	-	-
Total Taxes	$ 48,020,578		$ 48,020,578				$ 135,744
Franchies Fees (b)	$ 3,299,914		$ 3,299,914	Per Capita & 50% Employee	47.90	2,725.29	$ 130,545
Charges for Services							
Transportation Permits	5,000	100%	5,000	Per Capita & 50% Employee	0.07	2,725.29	198
Code Enforcement - Weed Abatement	44,267	100%	44,267	Per Capita & 50% Employee	0.64	2,725.29	1,751
Code Enforcement - Turbo Data	37,005	100%	37,005	Per Capita & 50% Employee	0.54	2,725.29	1,464
Code Enforcement Lien Recovery	4,500	100%	4,500	Per Capita & 50% Employee	0.07	2,725.29	178
Live Scan Fingerprinting	20,000	100%	20,000	Per Capita & 50% Employee	0.29	2,725.29	791
Notary Fees	200	100%	200	Per Capita & 50% Employee	0.00	2,725.29	8
Passport Fees	-	100%	-	Per Capita & 50% Employee	0.00	2,725.29	-
Special Police Services	94,000	100%	94,000	Per Capita & 50% Employee	1.36	2,725.29	3,719
Building Rental	85,000	100%	85,000	Per Capita & 50% Employee	1.23	2,725.29	3,363
Parks Rental	70,000	100%	70,000	Per Capita & 50% Employee	1.02	2,725.29	2,769
Administrative Fees - DIF	40,000	100%	40,000	Per Capita & 50% Employee	0.58	2,725.29	1,582
Administrative Fees - Planning	10,000	100%	10,000	Per Capita & 50% Employee	0.15	2,725.29	396
Administrative Fees - Public Works	148,000	100%	148,000	Per Capita & 50% Employee	2.15	2,725.29	5,855
Other Charges for Services (c)	769,775	0%	-	Per Capita & 50% Employee	0.00	2,725.29	-
Total Charges for Service:	$ 1,356,247		$ 557,972				$ 22,073
Licenses (d)	$ 375,000	100%	$ 375,000	Per Capita & 50% Employee	5.44	2,725.29	$ 14,835
Permits							
Building Permits and Inspections	2,190,097	100%	2,190,097	Per Capita & 50% Employee	31.79	2,725.29	86,640
Yard Sale	4,200	0%	-	Per Capita & 50% Employee	0.00	2,725.29	-
Misc Permits - Alarm Permit	1,500	100%	1,500	Per Capita & 50% Employee	0.02	2,725.29	59
Encroachment Permits	9,000	100%	9,000	Per Capita & 50% Employee	0.13	2,725.29	356
Building Plan Check	704,528	100%	704,528	Per Capita & 50% Employee	10.23	2,725.29	27,871
Railcar Fees	5,892	100%	5,892	Per Capita & 50% Employee	0.09	2,725.29	233
Planning Department Revenue	300,000	100%	300,000	Per Capita & 50% Employee	4.35	2,725.29	11,868
Public Works - Permits	14,000	100%	14,000	Per Capita & 50% Employee	0.20	2,725.29	554
Public Works - Permits Labor	-	100%	-	Per Capita & 50% Employee	0.00	2,725.29	-
Public Works - Plan Check	80,000	100%	80,000	Per Capita & 50% Employee	1.16	2,725.29	3,165
Public Works - Inspection	80,000	100%	80,000	Per Capita & 50% Employee	1.16	2,725.29	3,165
Public Works - Inspection Labor	8,000	100%	8,000	Per Capita & 50% Employee	0.12	2,725.29	316
Public Works - Engineering	10,000	100%	10,000	Per Capita & 50% Employee	0.15	2,725.29	396
Public Works - Engineering Labor	10,000	100%	10,000	Per Capita & 50% Employee	0.15	2,725.29	396
Fire Department Fees	250,000	100%	250,000	Per Capita & 50% Employee	3.63	2,725.29	9,890
Total Permits:	$ 3,667,217		$ 3,663,017				$ 144,909
Other Financing Sources (e)	$ -	0%	$ -	Per Capita & 50% Employee	0.00	2,725.29	$ -
Cost Recovery (f)	$ 866,920	100%	$ 831,920	Per Capita & 50% Employee	12.08	2,725.29	$ 28,065
Miscellaneous Revenue (g)	$ 1,870,860	100%	$ 1,870,860	Per Capita & 50% Employee	27.16	2,725.29	$ 74,011
Fines and Forfeitures (h)	$ 115,000	100%	$ 115,000	Per Capita & 50% Employee	1.67	2,725.29	$ 4,549
Transfers (i)	$ 8,218,067	0%	$ -	Per Capita & 50% Employee	0.00	2,725.29	$ -
Total	**$ 67,789,803**		**$ 58,734,261**				**$ 554,731**

Footnotes:
(a) Based on City of Beaumont FY 2023-24 Adopted Budget.
(b) Franchise Fees include revenues from Edison, Cable, Verizon/Frontier, Gas Company, and Waste Management.
(c) Other Charges for Service includes revenues from Animal License, Care and Recovery Cost, School Resource Officer Program, Community Programs, Bond Acceptance/Reduction/Exoneration, Building and Parks Rental, Community Service Staff Time, Sale of Miscellaneous Copies, Sale of Misc Copies, and Parks and Recreation Contract Classes.
(d) Licenses includes revenues from Business Licenses.
(e) Other Financing Sources includes revenues from Sale of Property.
(f) Cost Recovery includes revenues from Solid Waster Support Services, Plan Check, Inspection, Credit Card Fees, Coachella/ Stagecoach, RAID, PACT, BUSD, OES, Park Utilities, POST, Insurance Recovery, and Claims.
(g) Miscellaneous Revenue includes revenues from Release of Lien, Interest, Interest - CFD Bonds, Principle Received - CFD, Cost Recovery Plan Check/Inspections, Lease Revenue, Admin Overhead Revenue, and Cal Card Rebate.
(h) Fines and Forfeitures includes revenues from Abandoned Vehicle Program, General Fines, Parking Fine Revenue, and CA Vehicle Code Fines.
(i) Transfers includes revenues from Transfers In and Transfers In- Overhead.

Table 9
Recurring Expenditures
Beaumont Pointe

Expenditure Category	City FY 2023/24 Adopted Budget (a)	Percentage Adjustment	Adjusted Budget	Multiplier	Factor	Project Equivalent Persons	Project Cost
Non-Departmental							
Transfers Out	$ 10,935,086	0%	-	Per Capita & 50% Employee	-	2,725	$ -
Subtotal Non-Departmental	10,935,086		-				-
Administration							
City Council	202,143	50%	101,072	Per Capita & 50% Employee	1.47	2,725	3,998
City Clerk	459,449	50%	229,725	Per Capita & 50% Employee	3.33	2,725	9,088
Administration	1,545,057	50%	772,529	Per Capita & 50% Employee	11.21	2,725	30,561
Communication	390,477	50%	195,239	Per Capita & 50% Employee	2.83	2,725	7,724
IT Department	1,798,922	50%	899,461	Per Capita & 50% Employee	13.06	2,725	35,583
Risk and Human Resources	3,625,354	50%	1,812,677	Per Capita & 50% Employee	26.31	2,725	71,709
Legal	1,500,000	50%	750,000	Per Capita & 50% Employee	10.89	2,725	29,670
Finance and Budgeting	1,942,334	50%	971,167	Per Capita & 50% Employee	14.10	2,725	38,419
Subtotal Administration	11,463,736		5,731,868				226,753
Community Development							
Community Development	812,062	50%	406,031	Per Capita & 50% Employee	5.89	2,725	$ 16,063
Economic Development	1,207,540	50%	603,770	Per Capita & 50% Employee	8.76	2,725	23,885
Community Enhancement	362,525	50%	181,263	Per Capita & 50% Employee	2.63	2,725	7,171
Building and Safety	1,554,947	50%	777,474	Per Capita & 50% Employee	11.29	2,725	30,757
Subtotal Community Development	3,937,074		1,968,537				$ 77,875
Community Services							
Parks and Recreation	1,899,199	50%	949,600	Per Capita & 50% Employee	13.78	2,725	$ 37,566
Building Maintenance	1,118,910	50%	559,455	Per Capita & 50% Employee	8.12	2,725	22,132
Parks and Grounds Maintenance	5,459,105	50%	2,729,553	Per Capita & 50% Employee	39.62	2,725	107,981
Subtotal Community Services	8,477,214		4,238,607				$ 167,679
Public Safety							
Public Safety - OES	15,000	100%	15,000	Per Capita & 50% Employee	0.22	2,725	$ 593
Police	16,486,010	100%	16,486,010	Per Capita & 50% Employee	239.31	2,725	652,186
Police Support	2,928,561	100%	2,928,561	Per Capita & 50% Employee	42.51	2,725	115,854
Fire (b)	11,396,728	100%	11,396,728	Per Capita & 50% Employee	165.43	2,725	450,854
K-9	14,214	100%	14,214	Per Capita & 50% Employee	0.21	2,725	562
Animal Control	385,923	100%	385,923	Per Capita & 50% Employee	5.60	2,725	15,267
Subtotal Public Safety	31,226,436		31,226,436				$ 1,235,317
Public Works							
Public Safety - OES							
Engineering and Public Works	3,606,165	100%	3,606,165	Per Capita & 50% Employee	52.35	2,725	$ 142,660
Street Maintenance	2,720,618	100%	2,720,618	Per Capita & 50% Employee	39.49	2,725	107,628
Total Public Works	6,326,783		6,326,783				$ 250,287
Total	**$ 72,366,329**		**$ 49,492,231**				**$ 1,957,912**

Footnotes:
(a) Per the City of Beaumont FY 2023/2024 Annual Budget.
(b) Public Safety Fire Expenditures are from the 23/24 Annual Budget and includes an additional $4,576,526 fire contract to operate an additional fire station.

Table 10
Permanent Employment per Developer EIR
Beaumont Pointe

Tenant Type	Bldg. SF (a)	Estimated SF per Employee (b)	Estimated Employees
Commercial Areas			
Industrial (Self Storage) - PA 3	35,000	1,000	35
Industrial Building 1 - PA 4	879,000	1,000	879
Industrial Building 1 - PA 4 (c)	500,000	750	667
Industrial Building 2 - PA 5	981,000	1,000	981
Industrial Building 3 - PA 6	700,000	1,000	700
Industrial Building 4 - PA 7	600,000	1,000	600
Industrial Building 5 - PA 8	1,300,000	1,000	1,300
General Commercial	216,000	1,163	186
Restaurant	30,000	1,163	26
Subtotal - Industrial / Commercial	5,241,000		5,373
Hotel			
Hotel - 125 Rooms	90,000	1,163	77
Subtotal Hotel	90,000		77
Total	**5,331,000**		**5,451**

Footnotes:

(a) Per Table 3.

(b) Values for Square Feet per Employee based on Specific Plan EIR dated 12/20/2022 and Provided by Developer 6/29/2023.

(c) Represents general light industiral square footage portion of industrial warehouse building.

Appendix C

Fiscal Revenue Analysis Time-Phased Revenue and Expenditure Summary
Beaumont Pointe

Square Footage / Room Count (a)	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Industrial	1,379,000	1,379,000	3,060,000	3,060,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000	4,995,000
General Commercial	-	-	-	-	216,000	216,000	216,000	216,000	216,000	216,000	216,000	216,000	216,000	216,000	216,000	216,000	216,000
Restaurant	-	-	-	-	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000	30,000
Hotel Rooms	-	-	-	-	125	125	125	125	125	125	125	125	125	125	125	125	125

Revenues (b)	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Property Tax	$ 136,362	$ 139,089	$ 314,811	$ 321,107	$ 566,153	$ 577,476	$ 589,025	$ 600,806	$ 612,822	$ 625,078	$ 637,580	$ 650,332	$ 663,338	$ 676,605	$ 690,137	$ 703,940	$ 718,019
TOT	-	-	-	-	569,731	575,428	581,182	586,994	592,864	598,793	604,781	610,828	616,937	623,106	629,337	635,631	641,987
VLF	384,831	392,528	888,439	906,208	1,566,016	1,629,714	1,629,283	1,661,869	1,695,106	1,729,009	1,763,589	1,798,860	1,834,838	1,871,534	1,908,965	1,947,144	1,986,087
On-Site Sales Revenue	-	-	-	-	490,342	500,149	510,152	520,355	530,762	541,377	552,204	563,249	574,514	586,004	597,724	609,678	621,872
Other Revenues	157,310	160,456	341,660	348,494	600,459	612,468	624,717	637,211	649,956	662,955	676,214	689,738	703,533	717,604	731,956	746,595	761,527
Total Revenues	$ 678,503	$ 692,073	$ 1,544,910	$ 1,575,809	$ 3,792,700	$ 3,895,234	$ 3,934,360	$ 4,007,235	$ 4,081,510	$ 4,157,211	$ 4,234,368	$ 4,313,007	$ 4,393,159	$ 4,474,853	$ 4,558,119	$ 4,642,988	$ 4,729,491

Expenditures (c)	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40
Non-Departmental	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
Administration	64,302	66,231	142,409	146,682	255,212	262,868	270,754	278,877	287,243	295,861	304,737	313,879	323,295	332,994	342,984	353,273	363,871
Community Development	22,084	22,746	48,909	50,376	87,649	90,279	92,987	95,777	98,650	101,610	104,658	107,798	111,032	114,362	117,793	121,327	124,967
Community Services	47,550	48,977	105,309	108,468	188,724	194,386	200,218	206,224	212,411	218,783	225,347	232,107	239,070	246,243	253,630	261,239	269,076
Public Safety	350,310	367,825	806,249	846,561	1,501,536	1,576,613	1,655,443	1,738,216	1,825,126	1,916,383	2,012,202	2,112,812	2,218,452	2,329,375	2,445,844	2,568,136	2,696,543
Public Works	70,976	73,105	157,190	161,906	281,701	290,152	298,856	307,822	317,057	326,568	336,365	346,456	356,850	367,556	378,582	389,940	401,638
Total Expenditures	$ 555,222	$ 578,885	$ 1,260,066	$ 1,313,993	$ 2,314,822	$ 2,414,298	$ 2,518,259	$ 2,626,916	$ 2,740,487	$ 2,859,205	$ 2,983,308	$ 3,113,052	$ 3,248,700	$ 3,390,530	$ 3,538,833	$ 3,693,915	$ 3,856,095
Total Surplus (Deficit)	$ 123,281	$ 113,188	$ 284,845	$ 261,816	$ 1,477,878	$ 1,480,937	$ 1,416,101	$ 1,380,319	$ 1,341,022	$ 1,298,007	$ 1,251,059	$ 1,199,955	$ 1,144,460	$ 1,084,323	$ 1,019,286	$ 949,073	$ 873,396

Footnotes:

(a) Per Developer. Analysis shows anticipated absorption and the estimated annual surplus / (deficit) from the date of first construction until FY 2039/40. Escalation factors provided by City of Beaumont.

(b) Analysis estimated a 2.00% increase for all revenues except TOT which escalates at 1.00%.

(c) Analysis estimates a 3.00% increase for all expenditures except Public Safety which escalates at 5.00%. Public Safety Fire Expenditures are from the 23/24 Annual Budget and includes an additional $4,576,526 fire contract to operate an additional fire station.