



11.0 Appendices



11.1 NOP and Comment Letters



NOTICE OF PREPARATION

Date: May 8, 2024

To: Reviewing Agencies and Other Interested Parties

Subject: Notice of Preparation of an Environmental Impact Report

Project Title: Beaumont Heights Business Centre Project

Lead Agency: City of Beaumont

Project Applicant: Orbis Real Estate Partners

Scoping Meeting: May 29, 2024, 5:30 – 6:30pm
Beaumont City Hall – City Council Chambers
550 East 6th Street
Beaumont, CA 92223

The purpose of this Notice of Preparation (NOP) is to notify potential Responsible Agencies (Agencies) that the Lead Agency, the City of Beaumont (City), plans to prepare an Environmental Impact Report (EIR) for the proposed Beaumont Heights Business Centre Project (project) and to solicit comments and suggestions regarding (1) the scope and content of the EIR and (2) the environmental issues and alternatives to be addressed in the EIR per the California Environmental Quality Act (CEQA) Guidelines Section 15082. This NOP also provides notice to interested parties, organizations, and individuals of the preparation of the EIR and requests comments on the scope and contents of the environmental document.

The City requests your careful review and consideration of this notice and invites any and all input and comments from interested agencies, parties, organizations, and individuals regarding the preparation of the EIR. Pursuant to CEQA Guidelines Section 21080.4, commenters must submit any comments in response to this notice no later than 30 days beginning **May 8, 2024** and ending the close of business on **June 6, 2024**. This NOP is available for view at the City of Beaumont Planning Department, located at 550 East 6th Street, Beaumont, California 92223, and can also be accessed online at:

<https://www.beaumontca.gov/1125/Planning-Projects>

All comments or other responses to this notice should be submitted in writing to:

Carole Kendrick, Planning Manager
City of Beaumont - Planning Department
550 East 6th Street, Beaumont, California 92223
ckendrick@beaumontca.gov
951.572.3237

The City will conduct a public scoping meeting in conjunction with this NOP in order to present the project and the EIR process and to receive public comments and suggestions regarding the scope and content of the environmental document. The meeting will be held on May 29, 2024 from 5:30 – 6:30pm at Beaumont City Hall City Council Chambers located at 550 East 6th Street, Beaumont, CA 92223.

Project Location. The City is located in the westernmost portion of Riverside County (County); refer to Exhibit 1, Regional Vicinity. The City's Sphere of Influence (SOI) is located primarily to the south and west of City boundaries and covers an additional 11.2 square miles. The project site is adjacent to State Route 79 (SR-79); other major transportation routes through the City include Interstate 10 and State Route 60.

As shown on Exhibit 2, Site Vicinity, the project site encompasses approximately 797.7 acres primarily within the City's SOI to the west of the City's current incorporated boundary. Specifically, the site encompasses the following Assessor's Parcel Numbers (APNs), excluding the areas within and adjacent to SR-79 and California Avenue:

- | | | | |
|---------------|---------------|---------------|---------------|
| • 424-090-007 | • 424-130-002 | • 424-130-009 | • 428-020-003 |
| • 424-090-008 | • 424-130-003 | • 424-140-001 | • 428-020-007 |
| • 424-110-007 | • 424-130-004 | • 424-140-010 | • 428-020-008 |
| • 424-110-008 | • 424-130-005 | • 428-010-019 | • 428-020-009 |
| • 424-110-009 | • 424-130-006 | • 428-010-020 | |
| • 424-110-010 | • 424-130-007 | • 428-020-001 | |
| • 424-130-001 | • 424-130-008 | • 428-020-002 | |

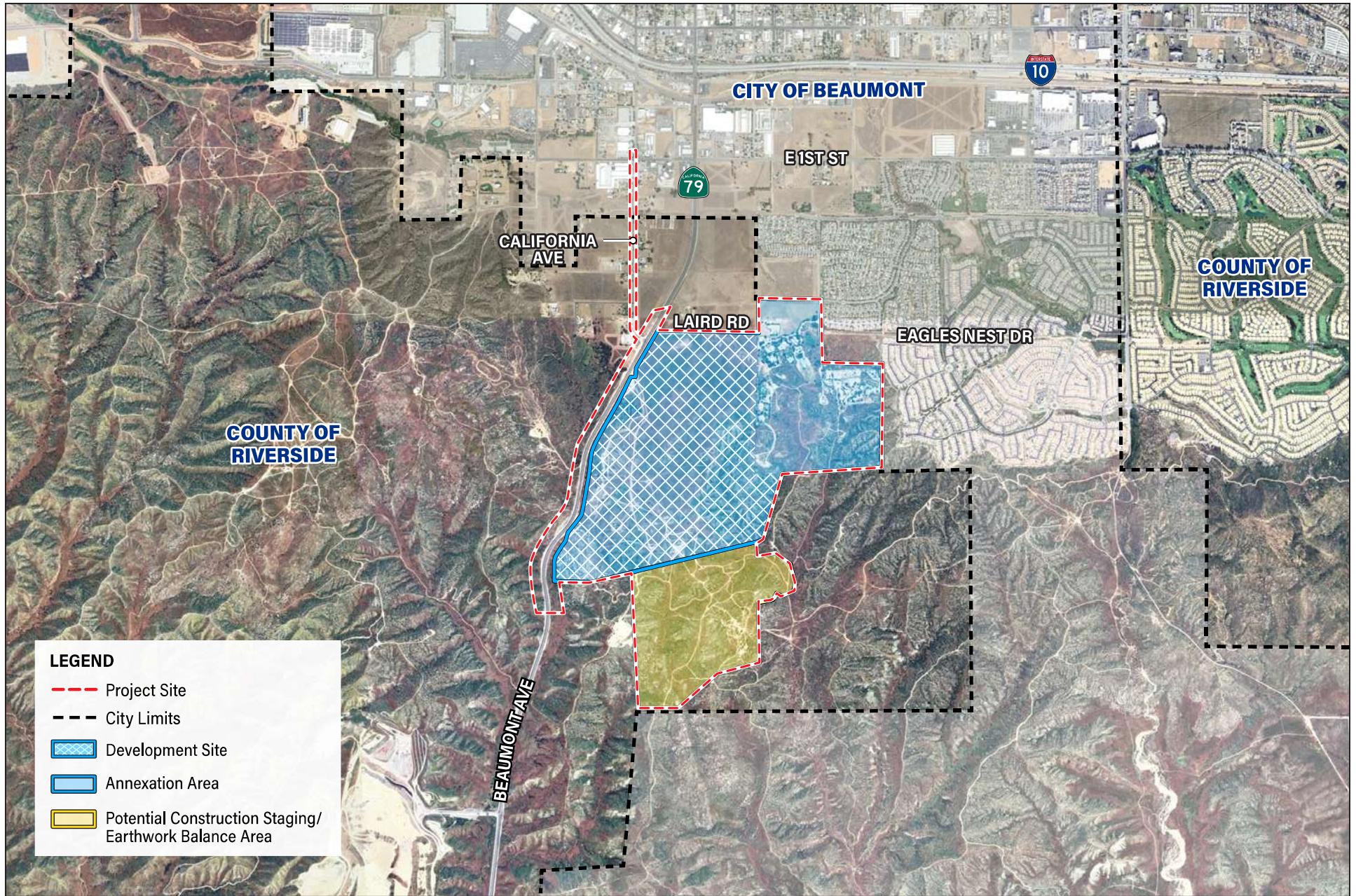
A small northern segment of the project site along California Avenue enters the current City limits; the remainder of the project site is located within the City's SOI. Generally, the site is bounded by First Street to the north, single-family residences and undeveloped land to the east, undeveloped land to the south, and SR-79 to the west; refer to Exhibit 2. Additionally, a Southern California Edison (SCE) easement bisects the southern portion of the site. Regional and local access to the site is provided via SR-79 and California Avenue.

Environmental Setting. The project site is entirely vacant and undeveloped land with the exception of the Childhelp Merv Griffin Village in the northeast corner of the site and improved segments of SR-79 and California Avenue; refer to Exhibit 2. Based on the *Riverside County Map My County Map*, the site has a land use designation of Rural Community – Estate Density Residential (RC-EDR) and Rural Mountainous (RM) and is entirely zoned W-2 (Controlled development areas).

According to the *Beaumont General Plan* (General Plan) Land Use Map, the project site is designated Urban Village, High Density Residential, Rural Residential 40, and Open Space. The City does not currently identify any zoning districts for the project site.

Surrounding land uses predominantly include undeveloped vacant land with some scattered residential uses, which are further described as follows:

- North: Undeveloped vacant land and single-family residences are located to the north of the project site. Uses to the north are located both within the City limits and SOI.
- East: Multi-family residences and undeveloped vacant land are located to the east of the project site. Uses to the east are located both within the City limits and SOI.



Source: Google Earth Pro, March 2024

- South: Undeveloped vacant land is located to the south of the site and both within the City limits and SOI.
- West: SR-79 bounds the site to the west. Undeveloped vacant land is located further west of SR-79 within the City's SOI.

Project Description. As shown on Exhibit 3, Conceptual Development Site Plan, the project proposes to develop four industrial buildings and associated improvements within the Development Site (blue hatched polygon on Exhibit 2), which encompasses approximately 383.7 acres. The Development Site and the approximately 182.3-acre area to the east of the Development Site (blue polygon on Exhibit 2) are proposed to be annexed into the City's jurisdiction, which would require Riverside County Local Agency Formation Commission (LAFCO) approval.

The southern approximately 168.5 acres (yellow polygon on Exhibit 2) are proposed solely for limited temporary construction staging and earthwork balance activities; no permanent development or annexation is proposed in this portion of the site. The remaining approximately 63.2-acre area of the project site (outside of the blue and yellow polygons) involve transportation improvements along SR-79 and utility installation (water, wastewater, electrical) along California Avenue.

Table 1, Proposed Development, provides details regarding each proposed building's site area, building square footage, and provided parking stalls. As shown, the proposed development would include approximately 5,275,306 square feet of combined office and industrial building area.

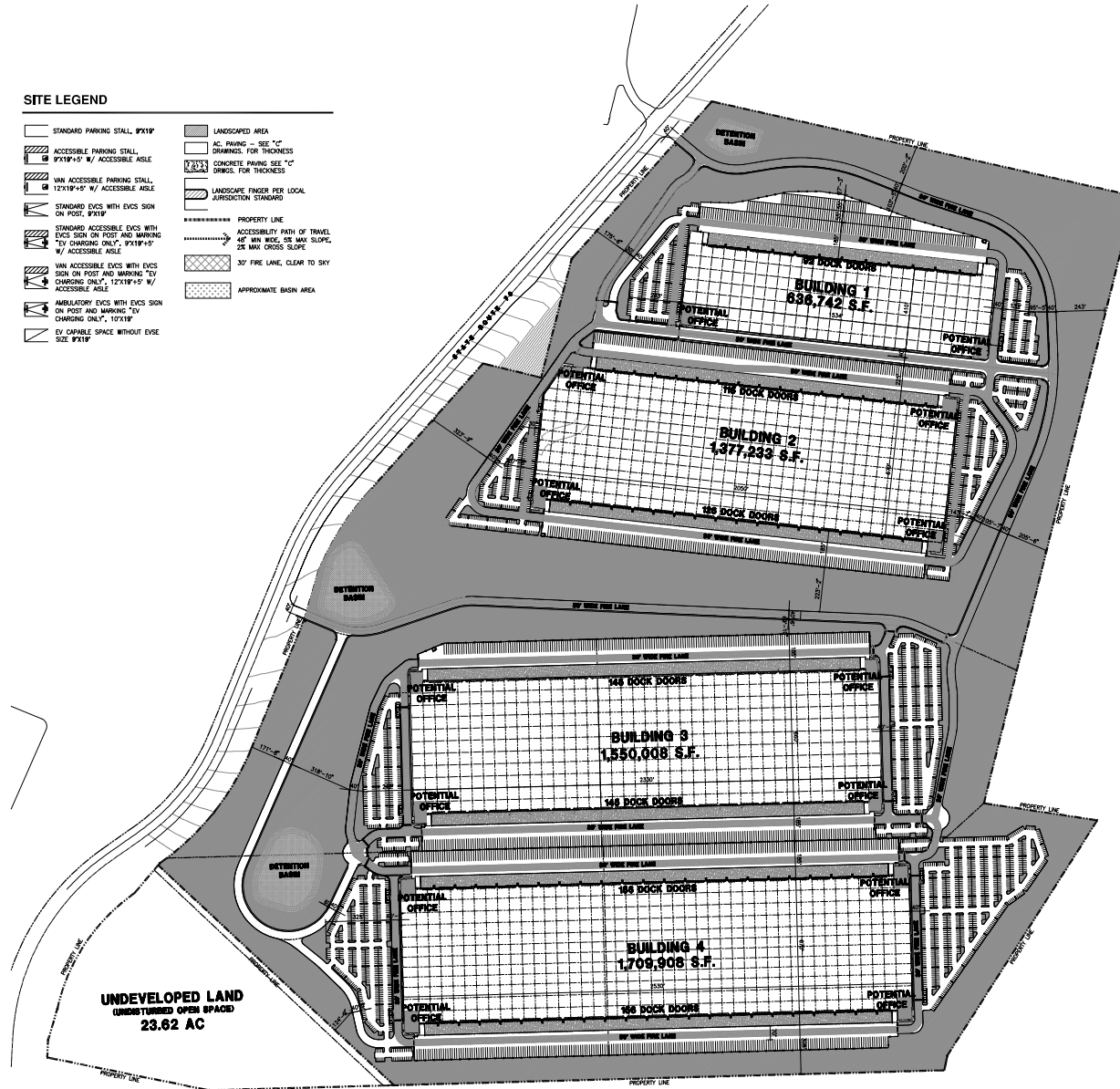
**Table 1
Proposed Development**

	Building 1	Building 2	Building 3	Building 4	Total
Site Area	2,625,347 SF; 60.27 ac	4,493,622 SF; 103.16 ac	4,219,018 SF; 96.86 ac	5,377,851 SF; 123.46 ac	16,715,838 SF; 383.74 ac
Building Area					
Office	20,000 SF	20,000 SF	20,000 SF	20,000 SF	80,000 SF
Industrial	616,980 SF	1,357,626 SF	1,530,400 SF	1,690,300 SF	5,195,306 SF
<i>Total</i>	<i>636,980 SF</i>	<i>1,377,626 SF</i>	<i>1,550,400 SF</i>	<i>1,710,300 SF</i>	<i>5,275,306 SF</i>
Parking					
Auto	474	809	936	1,359	3,578 stalls
Trailer	237	332	396	434	1,399 stalls
Notes: SF = square feet; ac = acres					

However, since ultimate end users for the proposed project have not been identified, to allow for flexibility and variability in final building design and layout, a conservative scenario with a maximum buildout of approximately 5.7 million square feet will be assumed in the EIR analysis. Specifically, an approximately eight percent increase in the proposed square footages detailed in Table 1 is accommodated in the maximum buildout assumptions provided in Table 2, Maximum Buildout EIR Assumptions.

SITE LEGEND

	STANDARD PARKING STALL, 8'x19'
	ACCESSIBLE PARKING STALL, 8'x19'+5' W/ ACCESSIBLE AISLE
	VAN ACCESSIBLE PARKING STALL, 12'x19'+5' W/ ACCESSIBLE AISLE
	STANDARD EVCS WITH EVCS SIGN ON POST, 8'x19'
	STANDARD ACCESSIBLE EVCS WITH EVCS SIGN ON POST AND MARKING "EV CHARGING ONLY", 8'x19'+5' W/ ACCESSIBLE AISLE
	VAN ACCESSIBLE EVCS WITH EVCS SIGN ON POST AND MARKING "EV CHARGING ONLY", 12'x19'+5' W/ ACCESSIBLE AISLE
	AMBULATORY EVCS WITH EVCS SIGN ON POST AND MARKING "EV CHARGING ONLY", 10'x19'
	EV CAPABLE SPACE WITHOUT EVCS, SIZE 8'x19'
	LANDSCAPED AREA
	AC PAVING - SEE "C" DRAWINGS FOR THICKNESS
	CONCRETE PAVING SEE "C" DRAWINGS FOR THICKNESS
	LANDSCAPE TIMBER PER LOCAL JURISDICTION STANDARD
	PROPERTY LINE
	ACCESSIBILITY PATH OF TRAVEL, 48" MIN WIDE, 5% MAX SLOPE, 2% MAX CROSS SLOPE
	30' FIRE LANE, CLEAR TO SKY
	APPROXIMATE BASIN AREA



Source: HPA Architecture, March 2024



NOT TO SCALE

03/2024 • JN 198405

Table 2
Maximum Buildout EIR Assumptions

	Building 1	Building 2	Building 3	Building 4	Total
Building Area					
Office	21,600 SF	21,600 SF	21,600 SF	21,600 SF	86,400 SF
Industrial	666,600 SF	1,467,000 SF	1,654,000 SF	1,826,000 SF	5,613,600 SF
<i>Total</i>	<i>688,200 SF</i>	<i>1,488,600 SF</i>	<i>1,675,600 SF</i>	<i>1,847,600 SF</i>	<i>5,700,000 SF</i>
Notes: Square footages are rounded; SF = square feet					

Each of the four industrial buildings could be constructed to a maximum height of 50 feet and could operate up to 24 hours a day, seven days a week, and employ up to approximately 6,250 employees in total. It is anticipated that a portion of the proposed industrial space would accommodate cold storage uses. Automobile and trailer parking stalls would be provided on all sides of each building, and landscaping would be installed throughout the site in accordance with City standards. Nighttime parking lot, vehicular access, and building security lighting are proposed on-site.

Circulation

Site access is proposed at two access points from SR-79, one near the northerly boundary of the Development Area, and the other further south along SR-79 near the center of the Development Area. On-site truck and passenger vehicle circulation would be provided with new drive aisles around and between the four industrial buildings as illustrated on [Exhibit 3](#).

Parking

Automobile and trailer parking stalls would be provided surrounding each industrial building. As detailed in [Table 1](#), the project would provide a total of 3,578 automobile parking stalls and 1,399 trailer parking stalls.

Utilities

The project would construct on-site utility improvements, including water, wastewater, storm drain, and dry utilities, to accommodate operations of the proposed industrial development. Notably, the proposed project would require the installation of water, wastewater, and electrical facilities within California Avenue to provide new connections from the project site to existing facilities within East 1st Street, north of the site.

The project site lies outside the current Beaumont Cherry Valley Water District (BCVWD) service area but is within BCVWD's SOI. To provide adequate water services to the site, the project would require annexation into the BCVWD service area.

Phasing and Construction

The Development Area would be mass graded in its entirety; subsequently, industrial development would be constructed in four phases, one phase per building. Anticipated grading consists of approximately 9,000,000 cubic yards of cut and approximately 10,000,000 cubic yards of fill material with a net import of approximately 1,000,000 cubic yards. Construction staging of equipment and soils would occur in the southern portion of the site south of

the SCE easement; refer to the yellow polygon on Exhibit 2. Construction is anticipated to have a duration of approximately seven years with each industrial building becoming operational as each phase is completed.

Discretionary Approvals

The City of Beaumont is the Lead Agency for the project and has discretionary authority over the project proposal. Anticipated City discretionary approvals include, but are not limited to, the following. The permits and approvals described below may change as the project entitlement process proceeds.

- Action on the environmental determination. Certification of the EIR would be required prior to, or concurrent with, approval of the project and any related actions.
- General Plan Amendment. The *Beaumont General Plan* would be amended to reflect annexation of the project site and application of the Industrial land use designation. Other *Beaumont General Plan* elements would be amended as required to reflect the project. Additionally, any other properties that may be annexed per LAFCO direction would adopt current underlying City SOI *Beaumont General Plan* Land Use Element designations.
- Pre-zoning of the Project Site. Prior to its annexation, the project site would be pre-zoned to allow for implementation of the project. The proposed pre-zoning would reflect a City of Beaumont Manufacturing zoning designation. Additionally, any other properties that may be annexed per LAFCO direction would be pre-zoned consistent with their underlying City SOI *Beaumont General Plan* Land Use Element designations.
- Subdivision of the Project Site. The project site would be subdivided into four parcels, one for each proposed building.
- Approval of Development Agreement(s). The Development Agreement(s) (DAs) would identify methods for the financing, acquisition, and construction of infrastructure systems and provide assurance that development of the property may proceed subject to the City's rules and regulations in effect at the time of the approval. The DAs would be subject to review and approval by the City pursuant to the City's established DA process.

In addition, anticipated consultation and permits necessary to realize the project would or may include the following:

- Annexation approval by Riverside County LAFCO to annex the "Annexation Area" identified on Exhibit 2 into the City of Beaumont;
- Annexation approval by Beaumont Cherry Valley Water District to annex the "Annexation Area" identified on Exhibit 2 into BCVWD's water service area;
- Approval from Riverside County for construction activities within the "Potential Construction Staging/Earthwork Balance Area" identified on Exhibit 2, which would be situated in unincorporated Riverside County;
- Permitting by/through the Regional Water Quality Control Board (RWQCB) pursuant to requirements of the City's National Pollutant Discharge Elimination System (NPDES) Permit;
- Permitting by/through the California Department of Fish and Wildlife (CDFW), U.S. Army Corps of Engineers (USACE), and U.S. Fish and Wildlife Services (USFWS) allowing for implementation of proposed mitigation to biological resources and jurisdictional areas;
- Consultation and coordination with the Western Riverside County Regional Conservation Authority (RCA);
- Permitting by/through the South Coast Air Quality Management District (SCAQMD) for certain equipment or land uses that may be implemented pursuant to the project;

- Permitting (i.e., utility construction and connection permits) from affected utility purveyors; and
- Other ministerial permits necessary to realize all on- and off-site improvements related to the development of the project.

Environmental Analysis. Due to the City's decision to prepare an EIR for this project, an Initial Study has not been prepared. This option is permitted under CEQA Guidelines Section 15063(a), which states that if the Lead Agency determines an EIR will be required for a project, the Lead Agency may skip further initial review and begin preparation of the EIR. The Draft EIR will focus on the following environmental issues:

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

Additional detail regarding the proposed EIR's scope of analysis related to these environmental topics is provided below:

Aesthetics. The proposed project could result in visual impacts due to potential view blockage/effects from the proposed buildings along SR-79 as well as the change in rural character/quality of the project area. Other impacts include new lighting from both interior and exterior lighting sources as well as vehicle headlights.

Agriculture and Forestry Resources. According to the California Department of Conservation's *Important Farmland Maps*, a portion of the site is identified as Farmland of Local Importance. Thus, the Draft EIR will analyze potential project impacts related to important farmland and the conversion of agricultural land to non-agricultural use.

Air Quality. The project may result in air quality impacts due to temporary construction-related emissions, as well as long-term air emissions from project operations. Short-term construction air quality impacts that may occur include dust generation, construction vehicle emissions, and possible odors. Anticipated industrial operations and daily vehicular trips may result in long-term air quality impacts within the South Coast Air Basin. These issues will be addressed in the Draft EIR, including project consistency with regional air quality planning programs.

Biological Resources. Sensitive biological species or habitat could occur on-site given the predominantly undeveloped and undisturbed nature of the site. The site is located within the boundaries of the Western Riverside County MSHCP and will require an analysis to determine consistency with the MSHCP. A range of biological resources studies will be prepared to evaluate potential project impacts in this regard.

Cultural Resources. Anticipated ground-disturbing activities associated with the proposed industrial development could impact potential historical and cultural resources. The Draft EIR will evaluate potential impacts on cultural resources.

Energy. Development in accordance with the project could result in increased energy consumption associated with short-term construction activities, long-term operations, buildings, and transportation. The Draft EIR will evaluate whether the project would result in wasteful, inefficient, or unnecessary consumption of energy. A consistency analysis with State or local plans for renewable energy or energy efficiency will also be conducted.

Geology and Soils. The City and surrounding area are situated within a seismically active region, capable of producing surface rupture, ground motion, liquefaction, or soil settlement of sufficient magnitude to damage buildings or structures during an earthquake. The Draft EIR will evaluate seismicity of the local area, presence of existing fault lines and effect on development, the potential for erosion of site soils, soil stability, and expansive characteristics of project area soils.

Greenhouse Gas Emissions. The proposed industrial development could increase greenhouse gas emissions both during construction and operations. The Draft EIR will analyze short-term construction activities and long-term operations, buildings, and transportation as these project components may generate greenhouse gas emissions.

Hazards and Hazardous Materials. The Draft EIR will consider the potential for accidental releases that could occur during construction and operations of the proposed development. Further, future uses within the project site could involve the use/storage/transport of hazardous materials during operations. The Draft EIR will address the potential that a significant hazard to the public may be created or the potential for reasonably foreseeable upset or accident conditions involving the release of hazardous materials during project operations. The Draft EIR will identify whether the proposed development would emit hazardous materials and/or interfere with any emergency response plans. Potential impacts to nearby residents and schools, if applicable, will also be evaluated.

Hydrology and Water Quality. As part of the Draft EIR, existing on-site flooding conditions will be considered as well as the potential that project implementation could place future structures within a flood hazard zone or impede or redirect flood flows. The proposed development would generate pollutants typical of urban development, which may adversely impact receiving waters. The Draft EIR will analyze short-term temporary construction-related effects on hydrology and water quality; long-term project-related water quality; permanent changes to stormwater drainage and/or flooding; project-related impacts to groundwater quantity and quality; and off-site hydrology and water quality impacts.

Land Use and Planning. The project would require approval of a General Plan Amendment and Zone Change, among other entitlements, to allow the proposed industrial use on-site and annexation into the City from unincorporated Riverside County. The proposed project will be evaluated with regard to land use consistency with the *Beaumont General Plan*, *Beaumont Municipal Code*, and the Southern California Association of Governments (SCAG) 2020-2045 RTP/SCS. Applicable land use policies from the *County of Riverside General Plan* and *The Pass Area Plan* will also be considered.

Mineral Resources. Based on *Beaumont General Plan Environmental Impact Report* Figure 5.11-1, *Mineral Resource Zones*, a portion of the project site is identified as Mineral Resource Zone (MRZ) 3. MRZ 3 is defined as areas containing known or inferred mineral deposits that may qualify as mineral resources. The Draft EIR will evaluate potential impacts to the loss of availability of a known mineral resource or mineral resource recovery site.

Noise. Future development within the project site may result in short-term construction noise and long-term changes in noise levels in the area due to project operations and traffic volume changes along area roadways. Future project-related on-site stationary activities and off-site mobile noise (from motor vehicles) may adversely affect noise levels to adjacent sensitive receptors within the area. The Draft EIR will describe these potential construction and operational noise impacts and will compare these impacts to applicable noise thresholds. The Draft EIR will evaluate these potential noise-related issues as well as address the noise/land use compatibility of the proposed project with existing and future expected noise levels.

Population and Housing. The proposed project may generate indirect population growth in the area since it would generate employment through the creation of industrial uses. The Draft EIR will present existing population, housing, and employment figures for the project site and the projected changes in these variables as a result of project implementation. The population analysis will compare the amount and type of growth anticipated under the proposed project with estimates from the *Beaumont General Plan*, *County of Riverside General Plan*, U.S. Census Bureau, California Department of Finance, and other adopted planning documents.

Public Services. Potentially affected agencies such as fire and law enforcement protection, schools, parks, and public libraries will be contacted, as needed, to confirm relevant existing conditions, project impacts, and recommended mitigation measures. The discussion will focus on the potential alteration of existing facilities, extension, or expansion of new facilities, and the increased demand on services based on the proposed land uses. The Draft EIR will evaluate the ability of the project to receive adequate service based on applicable City standards and, where adequate services are not available, will identify the effects of inadequate service.

Recreation. The proposed industrial development could result in indirect population growth from future employees and their families moving into the project area. Thus, the project could indirectly impact existing parks and recreational facilities within the City. The Draft EIR will analyze the potential for increased use of or substantial degradation of existing local and regional parks.

Transportation. The Draft EIR will analyze the project's potential to conflict with an existing program, plan, ordinance, or policy addressing the circulation system (including transit, roadway, bicycle, and pedestrian facilities). An analysis of the project's impacts related to vehicle miles traveled (VMT) will also be provided. The Draft EIR will also analyze potential project impacts related to transportation hazards and emergency access.

Tribal Cultural Resources. Project development has the potential to uncover previously undiscovered tribal cultural resources in the project area. In accordance with Senate Bill 18 and Assembly Bill 52, the City will notify, and if necessary, consult with any tribes requesting consultation regarding the proposed project. The Draft EIR will summarize the results of the tribal consultation process and determine potential project impacts on tribal cultural resources.

Utilities and Service Systems. Potentially affected agencies such as water service, wastewater treatment, and solid waste providers will be contacted to confirm relevant existing conditions, project impacts, and recommended mitigation measures. The discussion will focus on the potential development requiring the construction of new facilities, expansion of existing facilities, and the increased demand on services based on the proposed land uses. The Draft EIR will evaluate the ability of the project to receive adequate service

based on applicable City standards and, where adequate services are not available, will identify the effects of inadequate service, and recommended mitigation measures.

Wildfire. According to the California Department of Forestry and Fire Protection (CAL FIRE), the entire project site is located in either a Moderate or Very High Fire Hazard Severity Zone in a State Responsibility Area. The Draft EIR will evaluate project impacts on wildfire hazards in the project area.

Cumulative Impacts. Consistent with Section 15130 of the CEQA Guidelines, the Draft EIR will discuss cumulative impacts of the proposed project, addressing each topic covered in the environmental analysis.

Effects Not Found to be Significant. This section will discuss those environmental issues found not to have an impact as a result of the proposed project.

Significant and Unavoidable Environmental Effects. This section will describe any significant and unavoidable impacts on the environment that cannot be avoided or reduced to a less than significant level with the application of mitigation measures.

Growth Inducing Effects. As a required discussion according to CEQA Section 15126.2(d), the Draft EIR will include a discussion of growth inducing effects. The anticipated growth conditions in the project area and parameters for consideration of any secondary impacts from growth will be discussed. The section will evaluate the potential for the proposed project to generate additional growth in the area using growth analysis criteria, such as the project's potential to foster economic or population growth or its potential to remove obstacles to population growth through extension of infrastructure.

Project Alternatives. Under CEQA, an EIR must include an analysis of a reasonable range of alternatives to the project, including the "No Project" alternative. A range of project alternatives will be defined and analyzed in comparison to the proposed project in terms of the extent to which project's objectives are met and a reduction in adverse impacts is achieved. The environmentally superior alternative will be identified.



May 17, 2024

Carole Kendrick, Planning Manager
City of Beaumont
550 East 6th Street
Beaumont, CA 92223

RE: Beaumont Heights Business Centre Project, SCH #2024050220

Dear Ms. Kendrick:

Thank you for the opportunity to provide comments on the Notice of Preparation for the Beaumont Heights Business Centre Project. While the logistics industry is an important component of our modern economy, warehouses can bring various environmental impacts to the communities where they are located. For example, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particulate matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹ Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.² The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate can contribute to traffic jams, deterioration of road surfaces, traffic accidents, and unsafe conditions for pedestrians and bicyclists. Depending on the circumstances of an individual project, warehouses may also have other environmental impacts.

To help lead agencies avoid, analyze, and mitigate warehouses' environmental impacts, the Attorney General Office's Bureau of Environmental Justice has published a document containing best practices and mitigation measures for warehouse projects. We have attached a

¹ California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (NO_x); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts>; Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (DPM).

² Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

copy of this document to this letter, and it is also available online.³ We encourage you to consider the information in this document as you prepare the draft environmental impact report for this project.

Priority should be placed on avoiding land use conflicts between warehouses and sensitive receptors and on mitigating the impacts of any unavoidable land use conflicts. However, even projects located far from sensitive receptors may contribute to harmful regional air pollution, so you should consider measures to reduce emissions associated with the project to help the State meet its air quality goals. A distant warehouse may also impact sensitive receptors if trucks must pass near sensitive receptors to visit the warehouse.

The Bureau will continue to monitor proposed warehouse projects for compliance with the California Environmental Quality Act and other laws. We are available to discuss as you prepare the draft environmental impact report and consider how to guide warehouse development in your jurisdiction. Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Sincerely,



CHRISTIE VOSBURG
Supervising Deputy Attorney General

For ROB BONTA
Attorney General

³ <https://oag.ca.gov/system/files/media/warehouse-best-practices.pdf>.



Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act

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In carrying out its duty to enforce laws across California, the California Attorney General's Bureau of Environmental Justice (Bureau)¹ regularly reviews proposed warehouse projects for compliance with the California Environmental Quality Act (CEQA) and other laws. When necessary, the Bureau submits comment letters to lead agencies regarding warehouse projects, and in rare cases the Bureau has filed litigation to enforce CEQA.² This document builds upon the Bureau's work on warehouse projects, collecting information gained from the Bureau's review of hundreds of warehouse projects across the state.³ It is meant to help lead agencies pursue CEQA compliance and promote environmentally-just development as they confront warehouse project proposals.⁴ While CEQA analysis is necessarily project-specific, this document provides information on feasible best practices and mitigation measures, nearly all of which have been adapted from actual warehouse projects in California.

I. Background

In recent years, the proliferation of e-commerce and rising consumer expectations of rapid shipping have contributed to a boom in warehouse development.⁵ California, with its ports, population centers, and transportation network, has found itself at the center of this trend. In 2020, the Ports of Los Angeles, Long Beach, and Oakland collectively accounted for over 34% of all United States international container trade.⁶ The Ports of Los Angeles and Long Beach alone generate about 35,000 container truck trips every day.⁷ Accordingly, the South Coast Air Basin now contains approximately 3,000 warehouses of over 100,000 square feet each, with a total warehouse capacity of approximately 700 million square feet, an increase of 20 percent over the last five years.⁸ This trend has only accelerated, with e-commerce growing to

¹ <https://oag.ca.gov/environment/justice>.

² <https://oag.ca.gov/environment/ceqa>; *People of the State of California v. City of Fontana* (Super. Ct. San Bernardino County, No. CIVSB2121829); *South Central Neighbors United et al. v. City of Fresno et al.* (Super. Ct. Fresno County, No. 18CECG00690).

³ This September 2022 version revises and replaces the prior March 2021 version of this document.

⁴ Anyone reviewing this document to determine CEQA compliance responsibilities should consult their own attorney for legal advice.

⁵ As used in this document, "warehouse" or "logistics facility" is defined as a facility consisting of one or more buildings that stores cargo, goods, or products on a short- or long-term basis for later distribution to businesses and/or retail customers.

⁶ Data from the Bureau of Transportation Statistics, Container TEUs (Twenty-foot Equivalent Units) (2020), <https://data.bts.gov/stories/s/Container-TEU/x3fb-aeda/> (Ports of Los Angeles, Long Beach, and Oakland combined for 14.157 million TEUs, 34% of 41.24 million TEUs total nationwide) (last accessed September 18, 2022).

⁷ U.S. Dept. of Transportation, Federal Highway Administration, *FHWA Operations Support – Port Peak Pricing Program Evaluation* (2020), available at <https://ops.fhwa.dot.gov/publications/fhwahop09014/sect2.htm> (last accessed September 18, 2022).

⁸ South Coast Air Qual. Mgmt. Dist., *Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305*, at 7-8, 41 (May 2021).

13% of all retail sales and 2021 being a second consecutive record year for new warehouse space leased.⁹ The latest data and forecasts predict that the next wave of warehouse development will be in the Central Valley.¹⁰

When done properly, these activities can contribute to the economy and consumer welfare. However, imprudent warehouse development can harm local communities and the environment. Among other pollutants, diesel trucks visiting warehouses emit nitrogen oxide (NO_x)—a primary precursor to smog formation and a significant factor in the development of respiratory problems like asthma, bronchitis, and lung irritation—and diesel particulate matter (a subset of fine particular matter that is smaller than 2.5 micrometers)—a contributor to cancer, heart disease, respiratory illnesses, and premature death.¹¹ Trucks and on-site loading activities can also be loud, bringing disruptive noise levels during 24/7 operation that can cause hearing damage after prolonged exposure.¹² The hundreds, and sometimes thousands, of daily truck and passenger car trips that warehouses generate contribute to traffic jams, deterioration of road surfaces, and traffic accidents.

These environmental impacts also tend to be concentrated in neighborhoods already suffering from disproportionate health impacts and systemic vulnerability. For example, a comprehensive study by the South Coast Air Quality Management District found that communities located near large warehouses scored far higher on California’s environmental justice screening tool, which measures overall pollution and demographic vulnerability.¹³ That

⁹ U.S. Census Bureau News, Quarterly Retail E-Commerce Sales 4th Quarter 2021 (February 22, 2022), https://www.census.gov/retail/mrts/www/data/pdf/ec_current.pdf (last accessed September 18, 2022); CBRE Research, *2022 North America Industrial Big Box Report: Review and Outlook*, at 2-3 (March 2022), available at <https://www.cbre.com/insights/reports/2022-north-america-industrial-big-box#download-report> (last accessed September 18, 2022).

¹⁰ CBRE Research, *supra* note 9, at 4, 36; New York Times, *Warehouses Are Headed to the Central Valley, Too* (Jul. 22, 2020), available at <https://www.nytimes.com/2020/07/22/us/coronavirus-ca-warehouse-workers.html>.

¹¹ California Air Resources Board, Nitrogen Dioxide & Health, <https://ww2.arb.ca.gov/resources/nitrogen-dioxide-and-health> (last accessed September 18, 2022) (NO_x); California Air Resources Board, Summary: Diesel Particulate Matter Health Impacts, <https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts> (last accessed September 18, 2022); Office of Environmental Health Hazard Assessment and American Lung Association of California, Health Effects of Diesel Exhaust, <https://oehha.ca.gov/media/downloads/calenviroscreen/indicators/diesel4-02.pdf> (last accessed September 18, 2022) (DPM).

¹² Noise Sources and Their Effects, <https://www.chem.purdue.edu/chemsafety/Training/PPETrain/dblevels.htm> (last accessed September 18, 2022) (a diesel truck moving 40 miles per hour, 50 feet away, produces 84 decibels of sound).

¹³ South Coast Air Quality Management District, “Final Socioeconomic Assessment for Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program and Proposed Rule 316 – Fees for Rule 2305” (May 2021), at 4-5.

study concluded that, compared to the South Coast Air Basin averages, communities in the South Coast Air Basin near large warehouses had a substantially higher proportion of people of color; were exposed to more diesel particulate matter; had higher rates of asthma, cardiovascular disease, and low birth weights; and had higher poverty and unemployment rates.¹⁴ Each area has its own unique history, but many of these impacts and vulnerabilities reflect historic redlining practices in these communities, which devalued land and concentrated poverty, racial outgroups, and pollution into designated areas.¹⁵

II. Proactive Planning: General Plans, Local Ordinances, and Good Neighbor Policies

To systematically guide warehouse development, we encourage local governing bodies to proactively plan for logistics projects in their jurisdictions. Proactive planning allows jurisdictions to prevent land use conflicts before they materialize and direct sustainable development. Benefits also include providing a predictable business environment, protecting residents from environmental harm, and setting consistent expectations jurisdiction-wide.

Proactive planning can take many forms. Land use designation and zoning decisions should channel development into appropriate areas. For example, establishing industrial districts near major highway and rail corridors but away from sensitive receptors¹⁶ can help attract investment while avoiding conflicts between warehouse facilities and residential communities. Transition zones with lighter industrial and commercial land uses may also help minimize conflicts between residential and industrial uses.

In addition, general plan policies, local ordinances, and good neighbor policies should set minimum standards for logistics projects. General plan policies can be incorporated into existing economic development, land use, circulation, or other related general plan elements. Many jurisdictions alternatively choose to consolidate policies in a separate environmental justice element. Adopting general plan policies to guide warehouse development may also help

¹⁴ *Id.* at 5-7.

¹⁵ Beginning in the 1930s, federal housing policy directed investment away from Black, immigrant, and working-class communities by color-coding neighborhoods according to the purported “riskiness” of loaning to their residents. In California cities where such “redlining” maps were drawn, nearly all of the communities where warehouses are now concentrated were formerly coded “red,” signifying the least desirable areas where investment was to be avoided. See University of Richmond Digital Scholarship Lab, Mapping Inequality, <https://dsl.richmond.edu/panorama/redlining/#loc=12/33.748/-118.272&city=los-angeles-ca> (Los Angeles), <https://dsl.richmond.edu/panorama/redlining/#loc=13/32.685/-117.132&city=san-diego-ca> (San Diego), <https://dsl.richmond.edu/panorama/redlining/#loc=11/37.81/-122.38&city=oakland-ca> (Oakland), <https://dsl.richmond.edu/panorama/redlining/#loc=13/37.956/-121.326&city=stockton-ca> (Stockton), <https://dsl.richmond.edu/panorama/redlining/#loc=12/36.751/-119.86&city=fresno-ca> (Fresno) (all last accessed September 18, 2022).

¹⁶ In this document, “sensitive receptors” refers to residences, schools, public recreation facilities, health care facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

jurisdictions comply with their obligations under SB 1000, which requires local government general plans to identify objectives and policies to reduce health risks in disadvantaged communities, promote civil engagement in the public decision making process, and prioritize improvements and programs that address the needs of disadvantaged communities.¹⁷

Local ordinances and good neighbor policies that set development standards for all warehouses in the jurisdiction are a critical and increasingly common tool that serve several goals. When well-designed, these ordinances direct investment to local improvements, provide predictability for developers, conserve government resources by streamlining project review processes, and reduce the environmental impacts of industrial development. While many jurisdictions have adopted warehouse-specific development standards, an ordinance in the City of Fontana provides an example to review and build upon.¹⁸ Good neighbor policies in Riverside County and by the Western Riverside Council of Government include additional measures worth consideration.¹⁹

The Bureau encourages jurisdictions to adopt their own local ordinances that combine the strongest policies from those models with measures discussed in the remainder of this document.

III. Community Engagement

Early and consistent community engagement is central to establishing good relationships between communities, lead agencies, and warehouse developers and tenants. Robust community engagement can give lead agencies access to community residents' on-the-ground knowledge and information about their concerns, build community support for projects, and develop creative solutions to ensure new logistics facilities are mutually beneficial. Examples of best practices for community engagement include:

- Holding a series of community meetings at times and locations convenient to members of the affected community and incorporating suggestions into the project design.
- Posting information in hard copy in public gathering spaces and on a website about the project. The information should include a complete, accurate project description, maps and drawings of the project design, and information about how the public can provide input and be involved in the project approval process. The

¹⁷ For more information about SB 1000, see <https://oag.ca.gov/environment/sb1000>.

¹⁸ <https://oag.ca.gov/system/files/attachments/press-docs/Final%20Signed%20Fontana%20Ordinance.pdf> (last accessed September 18, 2022).

¹⁹ For example, the Riverside County policy requires community benefits agreements and supplemental funding contributions toward additional pollution offsets, and the Western Riverside Council of Governments policy sets a minimum buffer zone of 300 meters between warehouses and sensitive receptors. <https://www.rivcocob.org/wp-content/uploads/2020/01/Good-Neighbor-Policy-F-3-Final-Adopted.pdf> (last accessed September 18, 2022) (Riverside County); <http://www.wrcog.cog.ca.us/DocumentCenter/View/318/Good-Neighbor-Guidelines-for-Siting-Warehouse-Distribution-Facilities-PDF?bidId=> (last accessed September 18, 2022) (Western Riverside Council of Governments).

information should be in a format that is easy to navigate and understand for members of the affected community.

- Providing notice by mail to residents and schools within a certain radius of the project and along transportation corridors to be used by vehicles visiting the project, and by posting a prominent sign on the project site. The notice should include a brief project description and directions for accessing complete information about the project and for providing input on the project.
- Providing translation or interpretation in residents' native language, where appropriate.
- For public meetings broadcast online or otherwise held remotely, providing for access and public comment by telephone and supplying instructions for access and public comment with ample lead time prior to the meeting.
- Partnering with local community-based organizations to solicit feedback, leverage local networks, co-host meetings, and build support.
- Considering adoption of a community benefits agreement, negotiated with input from affected residents and businesses, by which the developer provides benefits to the affected community.
- Creating a community advisory board made up of local residents to review and provide feedback on project proposals in early planning stages.
- Identifying a person to act as a community liaison concerning on-site construction activity and operations, and providing contact information for the community liaison to the surrounding community.
- Requiring signage in public view at warehouse facilities with contact information for a local designated representative for the facility operator who can receive community complaints, and requiring any complaints to be answered by the facility operator within 48 hours of receipt.

IV. Warehouse Siting and Design Considerations

The most important consideration when planning a logistics facility is its location. Warehouses located in residential neighborhoods or near sensitive receptors expose community residents and those using or visiting sensitive receptor sites to the air pollution, noise, traffic, and other environmental impacts they generate. Therefore, placing facilities away from sensitive receptors significantly reduces their environmental and quality of life harms on local communities. The suggested best practices for siting and design of warehouse facilities does not relieve lead agencies' responsibility under CEQA to conduct a project-specific analysis of the project's impacts and evaluation of feasible mitigation measures and alternatives; lead agencies' incorporation of the best practices must be part of the impact, mitigation and alternatives analyses to meet the requirements of CEQA. Examples of best practices when siting and designing warehouse facilities include:

- Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.²⁰
- Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.
- Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.
- Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.
- Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.
- Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.
- Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.
- Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.
- Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.
- Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
- Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.
- Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.
- Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.

²⁰ CARB, Air Quality and Land Use Handbook: A Community Health Perspective (April 2005), at ES-1. CARB staff has released draft updates to this siting and design guidance which suggests a greater distance may be warranted in some scenarios. CARB, Concept Paper for the Freight Handbook (December 2019), available at https://ww2.arb.ca.gov/sites/default/files/2020-03/2019.12.12%20-%20Concept%20Paper%20for%20the%20Freight%20Handbook_1.pdf (last accessed September 18, 2022).

V. Air Quality and Greenhouse Gas Emissions Analysis and Mitigation

Emissions of air pollutants and greenhouse gases are often among the most substantial environmental impacts from new warehouse facilities. CEQA compliance demands a proper accounting of the full air quality and greenhouse gas impacts of logistics facilities and adoption of all feasible mitigation of significant impacts. Although efforts by CARB and other authorities to regulate the heavy-duty truck and off-road diesel fleets have made excellent progress in reducing the air quality impacts of logistics facilities, the opportunity remains for local jurisdictions to further mitigate these impacts at the project level. Lead agencies and developers should also consider designing projects with their long-term viability in mind. Constructing the necessary infrastructure to prepare for the zero-emission future of goods movement not only reduces a facility's emissions and local impact now, but it can also save money as demand for zero-emission infrastructure grows. In planning new logistics facilities, the Bureau strongly encourages developers to consider the local, statewide, and global impacts of their projects' emissions.

Examples of best practices when studying air quality and greenhouse gas impacts include:

- Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.²¹
- When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.
- Preparing a quantitative air quality study in accordance with local air district guidelines.
- Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.
- Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.
- Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.

²¹ CEQA Guidelines § 15369.

- Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California’s Cap-and-Trade Program.

Examples of measures to mitigate air quality and greenhouse gas impacts from construction are below. To ensure mitigation measures are enforceable and effective, they should be imposed as permit conditions on the project where applicable.

- Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- Prohibiting off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day.
- Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.
- Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.
- Limiting the amount of daily grading disturbance area.
- Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.
- Forbidding idling of heavy equipment for more than three minutes.
- Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.
- Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.
- Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.
- Providing information on transit and ridesharing programs and services to construction employees.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.

Examples of measures to mitigate air quality and greenhouse gas impacts from operation include:

- Requiring all heavy-duty vehicles engaged in drayage²² to or from the project site to be zero-emission beginning in 2030.

²² “Drayage” refers generally to transport of cargo to or from a seaport or intermodal railyard.

- Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.
- Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.
- Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.
- Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.
- Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.
- Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.
- Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.
- Running conduit to designated locations for future electric truck charging stations.
- Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.
- Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.
- Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)
- Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.
- Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.
- Requiring all stand-by emergency generators to be powered by a non-diesel fuel.
- Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of

- trucks.
- Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.
- Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.
- Designing to LEED green building certification standards.
- Providing meal options onsite or shuttles between the facility and nearby meal destinations.
- Posting signs at every truck exit driveway providing directional information to the truck route.
- Improving and maintaining vegetation and tree canopy for residents in and around the project area.
- Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.
- Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.
- Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.

VI. Noise Impacts Analysis and Mitigation

The noise associated with logistics facilities can be among their most intrusive impacts to nearby sensitive receptors. Various sources, such as unloading activity, diesel truck movement, and rooftop air conditioning units, can contribute substantial noise pollution. These impacts are exacerbated by logistics facilities' typical 24-hour, seven-days-per-week operation. Construction noise is often even greater than operational noise, so if a project site is near sensitive receptors, developers and lead agencies should adopt measures to reduce the noise generated by both construction and operation activities.

Examples of best practices when studying noise impacts include:

- Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.
- Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound

pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.

- Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.

Examples of measures to mitigate noise impacts include:

- Constructing physical, structural, or vegetative noise barriers on and/or off the project site.
- Planning and enforcing truck routes that avoid passing sensitive receptors.
- Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.
- Verifying that construction equipment has properly operating and maintained mufflers.
- Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier
- Limiting operation hours to daytime hours on weekdays.
- Paving roads where truck traffic is anticipated with low noise asphalt.
- Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.

VII. Traffic Impacts Analysis and Mitigation

Warehouse facilities inevitably bring truck and passenger car traffic. Truck traffic can present substantial safety issues. Collisions with heavy-duty trucks are especially dangerous for passenger cars, motorcycles, bicycles, and pedestrians. These concerns can be even greater if truck traffic passes through residential areas, school zones, or other places where pedestrians are common and extra caution is warranted.

Examples of measures to mitigate traffic impacts include:

- Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.
- Installing signs in residential areas noting that truck and employee parking is prohibited.
- Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license

is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.

- Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.
- Consulting with the local public transit agency and securing increased public transit service to the project area.
- Designating areas for employee pickup and drop-off.
- Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.
- Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.
- Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.
- Constructing roadway improvements to improve traffic flow.
- Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.

VIII. Other Significant Environmental Impacts Analysis and Mitigation

Warehouse projects may result in significant environmental impacts to other resources, such as to aesthetics, cultural resources, energy, geology, or hazardous materials. All significant adverse environmental impacts must be evaluated, disclosed and mitigated to the extent feasible under CEQA. Examples of best practices and mitigation measures to reduce environmental impacts that do not fall under any of the above categories include:

- Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.
- Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.
- Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.
- Directing all lighting at the facility into the interior of the site.
- Using full cut-off light shields and/or anti-glare lighting.
- Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.
- Using cool pavement to reduce heat island effects.

- Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.
- Using light colored roofing materials with a solar reflective index of 78 or greater.
- Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.
- Designing skylights to provide natural light to interior worker areas.
- Installing climate control and air filtration in the warehouse facility to promote worker well-being.

IX. Conclusion

California's world-class economy, ports, and transportation network position it at the center of the e-commerce and logistics industry boom. At the same time, California is a global leader in environmental protection and environmentally just development. The guidance in this document furthers these dual strengths, ensuring that all can access the benefits of economic development. The Bureau will continue to monitor proposed projects for compliance with CEQA and other laws. Lead agencies, developers, community advocates, and other interested parties should feel free to reach out to us as they consider how to guide warehouse development in their area.

Please do not hesitate to contact the Environmental Justice Bureau at ej@doj.ca.gov if you have any questions.

Carole Kendrick

From: Rusk, Steven@CHP <SRusk@chp.ca.gov>
Sent: Wednesday, June 5, 2024 2:29 PM
To: Carole Kendrick; state.clearinghouse@opr.ca.gov
Cc: Long, Kevin@CHP; Abrahams, Kristen@CHP; Campa, Gilbert@CHP; Harris, Dejuan@CHP; CHP-EIR; Quayle, Colin@CHP
Subject: RE: Environmental Document Review – SCH # 2024050220 – Due to Lead Agency by 6/6/2024

Good Afternoon,

The California Highway Patrol (CHP) San Geronio Pass Area recently received a “Notice of Completion” environmental impact document regarding the Beaumont Heights Business Centre Project, State Clearinghouse (SCH) # 2024050220. The CHP is the primary agency that provides traffic law enforcement, safety, and traffic management on State Route 79 to the west of the proposed development site, located in unincorporated Riverside County. The San Geronio Pass Area is responsible for these functions and will be affected by the implementation of this project if the following is not addressed:

- Increased response times for emergency requests due to the increased number of tractor-trailer combination vehicles operating on State Route 79
- Proposed access points on SR-79 would need to be controlled by signal lights to manage the additional tractor-trailer combination vehicles that could operate 24 hours a day, and this is currently not addressed in the project proposal.
- State Route 79, in its current configuration near the project site, does not have adequate-width shoulders to accommodate tractor-trailer combination vehicles.
- Additional tractor-trailer combination vehicles would further degrade current congestion on State Route 79 northbound entering the Beaumont City limits and at State Route 79 at Interstate 10. As it currently stands, State Route 79 does not have enough capacity to accommodate the increase in tractor-trailer combination vehicles that the project would create.
- Current lighting on SR-79 in both directions adjacent to the project site is lacking, which could pose potentially dangerous driving conditions for the motoring public.
- California Avenue, to the west of the project site, is the only available detour, and in its current configuration, it is not able to handle increased tractor-trailer combination vehicles.
- Signage to alert the motoring public would need to be put in place due to the grade of State Route 79 adjacent to the location of the project site to address the slow-moving tractor-trailer combination vehicles.

Thank you,

Steven Rusk, Lieutenant
California Highway Patrol – San Geronio Pass Area
195 Highland Springs Ave.
Beaumont, CA 92223
(951) 846-5300

From: CHP-EIR <EIR@chp.ca.gov>
Sent: Thursday, May 23, 2024 3:12 PM

To: Harris, Dejuan@CHP <DHarris@chp.ca.gov>; Rusk, Steven@CHP <SRusk@chp.ca.gov>; Campa, Gilbert@CHP <GCampa@chp.ca.gov>
Cc: Long, Kevin@CHP <Kevin.Long@chp.ca.gov>; Abrahams, Kristen@CHP <Kristen.Abrahams@chp.ca.gov>
Subject: Environmental Document Review – SCH # 2024050220 – Due to Lead Agency by 6/6/2024

Good afternoon,

Special Projects Section (SPS) recently received the referenced Notice of Environmental Impact document from the State Clearinghouse (SCH) outlined in the following Web site:

[Beaumont Heights Business Centre Project \(ca.gov\)](#)

Due to the project's geographical proximity, please use the attached checklist to assess its potential impact to local operations and public safety. **If impact is determined**, responses should be e-mailed directly to the Lead Agency with cc to SCH and myself. **If there is no impact**, please do not include SCH or the Lead Agency in your response.

For more information on the EIR review process, please check out: [Power Point Commanders EIR Training.pptx \(sharepoint.com\)](#).

Please feel free to e-mail me if you have any questions.

Thank you,

Kristen Abrahams (Lange), AGPA
Special Projects Section, Transportation Planning Unit
CHP Headquarters
601 N. 7th Street
Sacramento, CA 95811
Office: (916) 843-3370
Direct: (916) 843-3386



Yana García
Secretary for
Environmental Protection



Department of Toxic Substances Control

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



Gavin Newsom
Governor

SENT VIA ELECTRONIC MAIL

June 4, 2024

Carole Kendrick
Planning Manager
City of Beaumont
550 East 6th Street
Beaumont, CA 92223
ckendrick@beaumontca.gov

RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT
REPORT FOR THE BEAUMONT HEIGHTS BUSINESS CENTRE PROJECT DATED
MAY 06, 2024 STATE CLEARINGHOUSE # [2024050220](#)

Dear Carole Kendrick,

The Department of Toxic Substances Control (DTSC) reviewed Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Beaumont Heights Business Centre Project. Based on the NOP, the project proposes to develop four industrial buildings and associated improvements within the project site, which encompasses approximately 383.7 acres. The project site and the approximately 182.3-acre area to the east of the site are proposed to be annexed into the City's jurisdiction. The remaining approximately 63.2-acre area of the project site involves transportation improvements along State Route-79 and utility installation along

California Avenue. Overall, the proposed development would include approximately 5,275,306 square feet of combined office and industrial building area. However, since ultimate end users for the proposed project have not been identified, to allow for flexibility and variability in final building design and layout, a conservative scenario with a maximum buildout of approximately 5.7 million square feet will be assumed in the EIR analysis. City discretionary approvals include EIR certification, General Plan Amendment, Pre-Zoning, Subdivision, and Development Agreement. After our review of the project, DTSC requests your considerations of the following comments:

1. Based on the review of historical documents, which only included soil sampling, DTSC recommends collecting soil vapor samples to confirm there is no potential for vapor intrusion in future workspaces. DTSC suggests sampling using the United States Environmental Protection Agency (USEPA) Method 8260B or USEPA Method TO-15 for Volatile Organic Compounds (VOCs), including naphthalene. Please refer to the [“Final Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion, February 2023,”](#) for guidance on sampling and analysis.
2. DTSC recommends that all imported soil and fill material should be tested to ensure any contaminants of concern meets screening levels as outlined in the [DTSC Preliminary Endangerment Assessment Guidance Manual](#). Additionally, DTSC advises referencing the [DTSC Information Advisory Clean Imported Fill Material Fact Sheet](#) if importing fill is necessary. To minimize the possibility of introducing contaminated soil and fill material there should be documentation of the origins of the soil or fill material or, if applicable, sampling be conducted to ensure that the imported soil and fill material for the intended land use. The soil sampling should include analysis based on the source of the fill and knowledge of the prior land use. Additional information can be found by visiting [DTSC’s Human and Ecological Risk Office \(HERO\) webpage](#).

Carole Kendrick
June 4, 2024
Page 3

3. Based on historical information and the removal of contaminated soil, residual staining or odors are unlikely to be observed. However, DTSC recommends being aware of these factors during the construction process and advises collecting an appropriate sample for waste characterization and contacting DTSC if further assessment is necessary. DTSC recommends compliance with all applicable or relevant and appropriate environmental laws.

DTSC appreciates the opportunity to comment on the NOP of a DEIR for the Beaumont Heights Business Centre Project. Thank you for your assistance in protecting California's people and environment from the harmful effects of toxic substances. If you have any questions or would like any clarification on DTSC's comments, please respond to this letter or via [email](#) for additional guidance.

Sincerely,



Tamara Purvis
Associate Environmental Planner
HWMP - Permitting Division – CEQA Unit
Department of Toxic Substances Control
Tamara.Purvis@dtsc.ca.gov

Carole Kendrick
June 4, 2024
Page 4

cc: (via email)

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

Samantha Hout
Environmental Scientist
Site Mitigation and Restoration Program
Department of Toxic Substances Control
Samantha.Hout@dtsc.ca.gov

Eileen Mananian
Supervising Environmental Scientist
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Dave Kereazis
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Dave.Kereazis@dtsc.ca.gov

Scott Wiley
Associate Governmental Program Analyst
HWMP – Permitting Division - CEQA Unit
Department of Toxic Substances Control
Scott.Wiley@dtsc.ca.gov

From: [Tricia Campbell](#)
To: [Carole Kendrick](#)
Subject: Beaumont Heights Business Centre Project - Joint Project Review Needed
Date: Thursday, May 16, 2024 9:58:32 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[1366_001.pdf](#)

Hi Carole:

Received the attached and just wanted to let you know portions of this project are in Cells and has not gone through HANS/JPR. I figure you are on top of this, but thought I would send you an email.

Thank you,
Tricia



Tricia A. Campbell
Regional Conservation Deputy Director
RCA/Riverside County Transportation Commission
951.787.7141 [Main](#) | 951.955.8805 [Direct](#) | 951.212.5661 [Mobile](#)
[Email: tcampbell@rctc.org](mailto:tcampbell@rctc.org)
[Mail: RCA in c/o RCTC](#) - PO Box 12008, Riverside, CA 92502
rctc.org | wrc-rca.org





Hans W. Kernkamp, General Manager-Chief Engineer

SENT VIA EMAIL ONLY

ckendrick@beaumontca.gov

June 5, 2024

Carole Kendrick, Planning Manager
City of Beaumont (City)
550 E. 6th Street
Beaumont, CA 92223

RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Beaumont Heights Business Centre Project

Dear Carole Kendrick,

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the proposed Beaumont Heights Business Centre Project (Project). The Project proposes to develop four industrial buildings and associated improvements within the Development Site which encompasses approximately 383.7 acres. The Development Site and the approximately 182.3-acre area to the east of the Development Site are proposed to be annexed into the City's jurisdiction. The southern approximately 168.5 acres are proposed solely for limited temporary construction staging and earthwork balance activities; no permanent development or annexation is proposed in this portion of the site. The remaining approximately 63.2-acre area of the project site involve transportation improvements along SR-79 and utility installation (water, wastewater, electrical) along California Avenue.

The RCDWR offers the following comments for your consideration while preparing the Project's EIR:

1. Construction of the proposed Project may generate a substantial quantity of construction and demolition (C&D) waste. Should a large quantity of the C&D waste be brought to a County landfill for disposal, it could exceed the landfill's daily permitted capacity, thus a violation of state regulations. In the DEIR, consider quantitatively analyzing this potential solid waste impact and discuss feasible mitigation programs/regulatory compliance.

Note: CalRecycle's website may be helpful to determine the Project's waste generation:
<https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>

2. The following information can be useful in the analysis of the solid waste impacts from future development:
 - a) Solid waste generated within the Project area will be collected by the City's waste hauler, Waste Management, Inc., with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Station (MVTs) for processing. The facility is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500 tons per day (tpd) operation.

- b) The waste hauler may utilize the El Sobrante, Lamb Canyon, and/or the Badlands Landfill for disposal. Descriptions of the local landfills are provided below:

El Sobrante Landfill:

The El Sobrante Landfill is located east of Interstate 15 and Temescal Canyon Road to the south of the City of Corona and Cajalco Road at 10910 Dawson Canyon Road. The landfill is owned and operated by USA Waste of California, a subsidiary of Waste Management, Inc., and encompasses 1,322 acres, of which 645 acres are permitted for landfill operation. The El Sobrante Landfill has a total disposal capacity of approximately 209.9 million cubic yards and can receive up to 70,000 tons per week (tpw) of refuse. USA Waste must allot at least 28,000 tpw for County refuse. The landfill's permit allows a maximum of 16,054 tons per day (tpd) of waste to be accepted into the landfill, due to the limits on vehicle trips. If needed, 5,000 tpd must be reserved for County waste, leaving the maximum commitment of Non-County waste at 11,054 tpd. Per the 2023 Annual Report, the landfill had a remaining in-County disposal capacity of approximately 47.2 million tons. In 2023, the El Sobrante Landfill accepted a daily average of 10,341 tons with a period total of approximately 3,184,920 tons. The landfill is expected to reach capacity in approximately 2059.

Lamb Canyon Landfill:

The Lamb Canyon Landfill is located between the City of Beaumont and City of San Jacinto at 16411 Lamb Canyon Road (State Route 79), south of Interstate 10 and north of Highway 74. The landfill is owned and operated by Riverside County. The landfill property encompasses approximately 1,189 acres, of which 703.4 acres encompass the current landfill permit area. Of the 703.4-acre landfill permit area, approximately 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 500 tpd for beneficial reuse. The site has an estimated total disposal capacity of approximately 21.1 million tons. As of January 1, 2024 (beginning of day), the landfill has a total remaining capacity of approximately 6.7 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2032. From January 2023 to December 2023, the Lamb Canyon Landfill accepted a daily average of 2,049 tons with a period total of approximately 627,127 tons. Landfill expansion potential exists at the Lamb Canyon Landfill site.

Badlands Landfill:

The Badlands Landfill is located northeast of the City of Moreno Valley at 31125 Ironwood Avenue and accessed from State Highway 60 at Theodore Avenue. The landfill is owned and operated by Riverside County. The existing landfill encompasses 1,168.3 acres, with a total disturbance area of 278 acres, of which 150 acres are for refuse disposal. Landfill expansion potential exists at the Badlands Landfill site. Under the 2022 Solid Waste Facility Permit (SWFP), the permitted disturbance area increases from 278 acres to 811 acres, and the refuse disposal area increases from 150 acres to 409 (in multiple stages). The landfill is currently permitted to receive 5,000 tpd of MSW for disposal and 300 tpd for beneficial reuse. The site has an estimated total capacity of approximately 68.6 million tons. As of January 1, 2024 (beginning of day), the landfill had a total remaining disposal

capacity of approximately 49.8 million tons. Under the 2022 SWFP, the landfill would have a remaining disposal capacity estimated to last, at a minimum, until approximately 2059. From January 2023 to December 2023, the Badlands Landfill accepted a daily average of 2,848 tons with a period total of approximately 874,450 tons.

3. Additionally, you may wish to consider incorporating the following measures for future development to help reduce the Project's anticipated solid waste impacts and enhance efforts to comply with the State's mandate (AB 75) of 50% solid waste diversion from landfilling¹:

- The use of mulch and/or compost in the development and maintenance of landscaped areas within the project boundaries is recommended. Recycle green waste through either onsite composting of grass, i.e., leaving the grass clippings on the lawn, or sending separated green waste to a composting facility.
- Consider xeriscaping and the use of drought tolerant low maintenance vegetation in all landscaped areas of the project.
- Hazardous materials are not accepted at the Riverside County landfills. Any hazardous wastes, including paint, used during construction must be properly disposed of at a licensed facility in accordance with local, state and federal regulations. For further information regarding the determination, transport, and disposal of hazardous waste, please contact the Riverside County Department of Health, Environmental Protection and Oversight Division, at 1.888.722.4234.
- AB 341 focuses on increased commercial waste recycling as a method to reduce greenhouse gas (GHG) emissions.² The regulation requires businesses and organizations that generate four or more cubic yards of waste per week and multifamily units of 5 or more, to recycle. A business shall take at least one of the following actions in order to reuse, recycle, compost, or otherwise divert commercial solid waste from disposal:
 - Source separate recyclable and/or compostable material from solid waste and donate or self-haul the material to recycling facilities.
 - Subscribe to a recycling service with waste hauler.
 - Provide recycling service to tenants (if commercial or multi-family complex).
 - Demonstrate compliance with requirements of California Code of Regulations Title 14.

For more information, please visit:

<http://www.rcwaste.org/business/recycling/mcr>

- AB 1826 requires businesses and multifamily complexes to arrange for organic waste recycling services.³ Those subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:

¹ A.B. 75, Chapter 764, 1999-2000 Strom-Martin, (Cal. 1999).

² A.B. 341, Chapter 476, 2011-2012 Chesbro, (Cal. 2011).

³ A.B. 1826, Chapter 727, 2013-2014 Chesbro, (Cal. 2014).

- Source separate organic material from all other recyclables and donate or self-haul to a permitted organic waste processing facility.
 - Enter into a contract or work agreement with gardening or landscaping service provider or refuse hauler to ensure the waste generated from those services meet the requirements of AB 1826.
 - Demonstrate compliance with SB 1383 which establishes regulations to reduce organics waste disposal and went into effect on January 1, 2022.⁴ This law establishes methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants caused by organics waste disposal.
4. The DEIR should note that the Lamb Canyon Landfill is located to the west of the Project area and that it is an active landfill, open since 1970. The Lamb Canyon Conservation Area is also located to the south and west of the Project area and impacts to it from the Project (such as drainage or other disturbance from construction or operation) should be evaluated and avoided.

Thank you for including RCDWR in the review process. Please continue to include the RCDWR in future transmittals. Please email me at kaavila@rivco.org if you have any questions regarding the above comments.

Sincerely,



Katherine Avila
Assistant Planner

Cc: Kinika Hesterly, RCDWR

DM# 332242

⁴ A.B 1383, Chapter 395, 2015-2016 Lara, (Cal. 2016).



RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

June 7, 2024

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

Attention: Carole Kendrick

Re: Beaumont Heights Business Centre Project,
APNs 424-090-007, 424-090-008,
424-110-007, 424-110-008, 424-110-009,
424-110-010, 424-130-001, 424-130-002,
424-130-003, 424-140-001 and 428-020-001

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

The District's review is based on the above-referenced project transmittal, received May 7, 2024. The District **has not** reviewed the proposed project in detail, and the following comments do not in any way constitute or imply District approval or endorsement of the proposed project with respect to flood hazard, public health and safety, or any other such issue:

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

Re: Beaumont Heights Business Centre Project,
APNs 424-090-007, 424-090-008,
424-110-007, 424-110-008, 424-110-009,
424-110-010, 424-130-001, 424-130-002,
424-130-003, 424-140-001 and 428-020-001

256536

finalization of the regulatory permits. There shall be no unreasonable constraint upon the District's ability to operate and maintain the flood control facility(ies) to protect public health and safety.

- ☐ This project is located within the limits of the District's Area Drainage Plan for which drainage fees have been adopted. If the project is proposing to create additional impervious surface area, applicable fees should be paid (in accordance with the Rules and Regulations for Administration of Area Drainage Plans) to the Flood Control District or City prior to issuance of grading or building permits. Fees to be paid should be at the rate in effect at the time of issuance of the actual permit.
- ☐ An encroachment permit shall be obtained for any construction related activities occurring within District right of way or facilities, namely, _____. If a proposed storm drain connection exceeds the hydraulic performance of the existing drainage facilities, mitigation will be required. For further information, contact the District's Encroachment Permit Section at 951.955.1266.
- ☒ The District's previous comments dated April 22, 2024 for Beaumont Heights Business Center Project PP 2024-0022 are still valid.

GENERAL INFORMATION

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

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

The project proponent shall bear the responsibility for complying with all applicable mitigation measures defined in the California Environmental Quality Act (CEQA) document (i.e., Negative Declaration, Mitigated Negative Declaration, Environmental Impact Report) and/or Mitigation Monitoring and Reporting Program, if a CEQA document was prepared for the project. The project proponent shall also bear the responsibility for complying with all other federal, state, and local environmental rules and regulations that may apply.

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

Very truly yours,



AMY MCNEILL

Engineering Project Manager

Attachment

cc: Riverside County Planning Department
Attn: Timothy Wheeler

EM:amh

From: [Mauricio Alvarez](#)
To: [Carole Kendrick](#)
Subject: Beaumont Heights Business Centre Project
Date: Thursday, May 16, 2024 9:48:09 AM

Good Morning Carole,

Thank you for including RTA in the development review of the Beaumont Heights Business Centre Project. After reviewing the plans, there are no recommendations to submit for this particular project at this time.

Thank you,

Mauricio Alvarez, MBA

Planning Analyst

Riverside Transit Agency

p: 951.565.5260 | e: malvarez@riversidetransit.com

[Website](#) | [Facebook](#) | [Twitter](#) | [Instagram](#)

1825 Third Street, Riverside, CA 92507



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
T: (213) 236-1800
www.scag.ca.gov

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Curt Hagman
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Tim Sandoval, Pomona

June 6, 2024

Carole Kendrick, Planning Manager
City of Beaumont, Planning Department
550 East 6th Street
Beaumont, CA 92223
Phone: (951) 572-3237
E-mail: ckendrick@beaumontca.gov

Subject: SCAG Comments on the Notice of Preparation of an Environmental Impact Report for the Beaumont Heights Business Centre Project [SCAG NO. IGR11067]

Dear Carole Kendrick:

Thank you for submitting the Notice of Preparation of an Environmental Impact Report for the Beaumont Heights Business Centre Project ("proposed project") to the Southern California Association of Governments (SCAG) for review. SCAG is responsible for providing informational resources to regionally significant plans, projects, and programs per the California Environmental Quality Act (CEQA) to facilitate the consistency of these projects with SCAG's adopted regional plans, to be determined by the lead agencies.¹

Pursuant to Senate Bill (SB) 375, SCAG is the designated Regional Transportation Planning Agency under state law and is responsible for preparation of the Regional Transportation Plan (RTP), including the Sustainable Communities Strategy (SCS). SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of and alignment with adopted Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) goals and policies. Finally, SCAG is the authorized regional agency for Intergovernmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372.

SCAG staff has reviewed the Notice of Preparation of an Environmental Impact Report for the Beaumont Heights Business Centre Project in Riverside County. The proposed project includes approximately 5,700,000 square feet of office and industrial building area with 4,977 parking stalls on 797.7 acres.

When available, please email environmental documentation to IGR@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the IGR Program, attn.: Ryan Bañuelos, Associate Regional Planner, at (213) 630-1532 or IGR@scag.ca.gov. Thank you.

Sincerely,

Frank Wen, Ph.D.
Manager, Planning Strategy Department

¹ Local jurisdictions and other lead agencies shall have the sole discretion to determine a local project's or plan's consistency and/or alignment with Connect SoCal 2024 for the purpose of determining consistency for CEQA purposes.

**COMMENTS ON THE NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT FOR THE
BEAUMONT HEIGHTS BUSINESS CENTRE PROJECT [SCAG NO. IGR11067]**

CONNECT SoCal 2024

Connect SoCal 2024 (Plan) is a long-range visioning plan for the six-county SCAG region, reflecting a continuation of the shift towards more efficient resource management including transportation infrastructure resources, land resources and environmental resources. The Plan highlights the existing land use and transportation conditions throughout the SCAG region and forecasts the region's evolving transportation needs between 2024 and 2050. The Plan identifies and prioritizes expenditures of the anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as aviation ground access.

The Plan was developed to achieve greenhouse gas (GHG) per capita emission reduction targets, consistent with Senate Bill (SB) 375 and other regional goals. In accordance with federal fiscal constraint requirements, Connect SoCal 2024 is a financially constrained Plan in terms of transportation revenues and expenditures. Connect SoCal 2024 would reduce traffic congestion, improve air quality, and improve the region's long-term economic viability through more than \$751 billion in transportation investments and a more sustainable regional development pattern. To view Connect SoCal 2024 and the accompanying technical reports, please visit the [Connect SoCal 2024](#) webpage.

Connect SoCal 2024 Vision and Goals

The SCAG Regional Council fully adopted the Plan on April 4, 2024. Connect SoCal 2024 represents the vision for the region and reflects the planned transportation investments, policies, and strategies that integrate with the Forecasted Regional Development Pattern to achieve the Plan's goals. The Vision and Goals for Connect SoCal 2024 are rooted in the direction set forth by Connect SoCal 2020, reflecting both SCAG's statutory requirements, the emerging trends, and persistent challenges facing the region. Reflecting input from engagement with stakeholders and members of the public, SCAG's vision for Southern California in the year 2050 is "*A healthy, prosperous, accessible and connected region for a more resilient and equitable future.*" The following goals and subgoals help the SCAG region to achieve this vision.

Mobility: Build and maintain an integrated multimodal transportation network

- Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions
- Ensure that reliable, accessible, affordable and appealing travel options are readily available, while striving to enhance equity in the offerings in high-need communities
- Support planning for people of all ages, abilities and backgrounds

Communities: Develop, connect and sustain communities that are livable and thriving

- Create human-centered communities in urban, suburban and rural settings to increase mobility options and reduce travel distances
- Produce and preserve diverse housing types in an effort to improve affordability, accessibility and opportunities for all households

Environment: Create a healthy region for the people of today and tomorrow

- Develop communities that are resilient and can mitigate, adapt to and respond to chronic and acute stresses and disruptions, such as climate change
- Integrate the region's development pattern and transportation network to improve air quality, reduce greenhouse gas emissions and enable more sustainable use of energy and water
- Conserve the region's resources

Economy: Support a sustainable, efficient and productive regional economic environment that provides opportunities for all residents

- Improve access to jobs and educational resources
- Advance a resilient and efficient goods movement system that supports the economic vitality of the region, attainment of clean air and quality of life for our communities

For ease of review, SCAG staff encourages the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency, or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG CONNECT SOCAL 2024 GOALS AND SUBGOALS		
	Goal/Subgoal	Analysis
Mobility Goal:	<i>Build and maintain an integrated multimodal transportation network</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; or Not Applicable: Statement as to why; DEIR page number reference</i>
Mobility Subgoal:	<i>Support investments that are well-maintained and operated, coordinated, resilient and result in improved safety, improved air quality and minimized greenhouse gas emissions</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.		etc.

Connect SoCal 2024 Key Elements

Unique to this plan cycle, SCAG developed a set of Regional Planning Policies and Implementation Strategies to guide decision-making in the region toward integrated land use and transportation planning and other goals in Connect SoCal 2024. Eighty-eight Regional Planning Policies provide guidance for integrating land use and transportation planning to realize the vision of Connect SoCal 2024. The Implementation Strategies help the region to achieve this vision for the future and are priorities for SCAG efforts in fulfilling or going beyond the Regional Planning Policies. The Regional Planning Policies and Implementation Strategies were developed to achieve California’s greenhouse gas emission reduction goals as set forth in SB 375 and federal Clean Air Act Section 176(c) requirements for transportation conformity while meeting the broader regional objectives, such as improved equity and resilience in addition to preservation of natural lands, improvement of public health, increased roadway safety, support for the region’s vital goods movement industries and more efficient use of resources. The Plan also includes a detailed project list; strategic investments to bridge local plans with overarching regional performance targets and goals; a growth forecast and regional development pattern based on population, household and employment growth projections by 2050; and a transportation network including a list of transportation projects and investments.

Connect SoCal 2024 presents a summary of that work in five chapters of the Main Plan with additional details on Plan elements and analysis in the Plan’s accompanying 15 Technical Reports, including the [Goods Movement Technical Report](#). Connect SoCal 2024 builds upon the progress from previous RTP/SCS cycles, reflecting both SCAG’s statutory requirements, the emerging trends, and persistent challenges facing the region. These policies offer a resource by which County Transportation Commissions (CTCs) or local jurisdictions within the SCAG region, when seeking resources from state or federal programs, can refer to specific policies to demonstrate alignment with the RTP/SCS.

Regional Growth Forecast and Forecasted Regional Development Pattern

As part of developing a Sustainable Communities Strategy per SB 375, SCAG must include a “forecasted development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies ...” enables SCAG to reach its per capita GHG emission reduction target of 19 percent below 2005 levels by 2035. SCAG staff prepared a Forecasted Regional Development Pattern for Connect SoCal 2024 through 2050, the horizon year of the Plan. The regional growth forecast determines the projected increase in population, households, and jobs based on local general plans and known development entitlement agreements, including available data from 6th cycle housing element updates. The Connect SoCal 2024 [Demographic and Growth Forecast Technical Report](#) includes detailed discussions on socioeconomic data, including additional detail on the growth forecast, growth vision, and Sustainable Communities Strategy (SCS) consistency in Section of the Technical Report. The Connect SoCal 2024 [Land Use and Communities Technical Report](#) includes the most recent planning assumptions and estimates of population and housing.

SCAG's work helps facilitate implementation, but SCAG does not directly implement or construct projects or have land use authority. Achieving a sustained regional outcome depends upon informed and intentional local action. To access jurisdictional level growth estimates and forecasts for years 2030, 2035, and 2050, please refer to the [Final Connect SoCal 2024 growth forecast data](#). The growth forecasts for the region and the applicable jurisdiction is below.

	Adopted SCAG Region Growth Forecasts				Adopted City of Beaumont Growth Forecasts		
	Year 2019	Year 2030	Year 2035	Year 2050	Year 2019	Year 2035	Year 2050
Population	18,827,000	19,476,000	19,946,000	20,909,000	45,100	53,300	55,400
Households	6,193,000	7,006,000	7,311,000	7,814,000	14,100	18,500	19,900
Employment	8,976,000	9,609,000	9,885,000	10,276,000	7,800	10,700	12,300

Consistency with Connect SoCal 2024

SCAG provides informational resources to facilitate the lead agency's consistency determination of the proposed project with Connect SoCal 2024. For the purpose of determining consistency with CEQA, local jurisdictions shall have the sole discretion to determine a local project's or plan's consistency and/or alignment with Connect SoCal 2024².

CEQA MITIGATION MEASURES

The SCAG Regional Council certified the [Final Program Environmental Impact Report](#) for Connect SoCal 2024 (2024 PEIR) and adopted the Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations on April 4, 2024. The mitigation approach used in the 2024 PEIR recognizes the limits of SCAG's authority; distinguishes between SCAG commitments and project-level responsibilities and authorities; optimizes flexibility for project implementation; and facilitates CEQA streamlining (e.g., SB 375) and tiering where appropriate on a project-by project basis determined by each lead agency. Consistent with the approach, the 2024 PEIR identifies regional-level mitigation measures to be implemented by SCAG over the lifetime of the Plan as well as project-level mitigation measures that lead agencies can and should consider, as applicable and feasible, in subsequent project-specific design, CEQA review, and decision-making processes. Given that SCAG is not an implementing agency and has no decision-making authority over projects or any land use authority, it is ultimately up to each lead agency's own discretion to determine the appropriateness of mitigation measures, including exploring opportunities of voluntary regional advance mitigation programs, based on project-specific circumstances such as individual site conditions, project specific details, and community values. Therefore, SCAG staff recommends that the proposed project's CEQA lead agency review the 2024 PEIR for guidance, as appropriate.

² SCAG. April 2024. Connect SoCal 2024 [Demographic and Growth Forecast Technical Report](https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf). Accessible at: <https://scag.ca.gov/sites/main/files/file-attachments/23-2987-tr-demographics-growth-forecast-final-040424.pdf>



South Coast Air Quality Management District

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

SENT VIA E-MAIL:

June 6, 2024

ckendrick@beaumontca.gov

Carole Kendrick, Planning Manager
City of Beaumont - Planning Department
550 East 6th Street
Beaumont, California 92223

**Notice of Preparation of a Draft Environmental Impact Report for the
Beaumont Heights Business Centre Project (Proposed Project)
SCH No. 2024050220**

South Coast Air Quality Management District (South Coast AQMD) staff appreciate the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses (electronic versions of all emission calculation spreadsheets, air quality modeling, and health risk assessment input and output files, not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/south-coast-aqmd-air-quality-significance-thresholds.pdf>

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

The California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective*⁶ is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process with additional guidance on strategies to reduce air pollution exposure near high-volume roadways available in CARB's technical advisory⁷.

The South Coast AQMD's *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*⁸ includes suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. It is recommended that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions.

South Coast AQMD staff is concerned about potential public health impacts of siting warehouses within close proximity of sensitive land uses, especially in communities that are already heavily affected by the existing warehouse and truck activities. The South Coast AQMD's Multiple Air Toxics Exposure Study (MATES V), completed in August 2021, concluded that the largest contributor to cancer risk from air pollution is diesel particulate matter (DPM) emissions⁹. According to the MATES V carcinogenic risk interactive map, the area surrounding the Proposed Project has an estimated cancer risk of over 285 in one million¹⁰. Operation of warehouses generates and attracts heavy-duty diesel-fueled trucks that emit DPM. When the health impacts from the Proposed Project are added to those existing impacts, residents living

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ CARB's *Air Quality and Land Use Handbook: A Community Health Perspective* can be found at: <https://www.aqmd.gov/docs/default-source/ceqa/handbook/california-air-resources-board-air-quality-and-land-use-handbook-a-community-health-perspective.pdf>.

⁷ CARB's technical advisory can be found at: https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf.

⁸ South Coast AQMD. 2005. *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning*. Available at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

⁹ South Coast AQMD. August 2021. *Multiple Air Toxics Exposure Study in the South Coast Air Basin V*. Available at: <http://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v>.

¹⁰ South Coast AQMD. MATES V Data Visualization Tool. Accessed at: [MATES Data Visualization \(arcgis.com\)](https://www.aqmd.gov/mates-v-data-visualization).

in the communities surrounding the Proposed Project will possibly face an even greater exposure to air pollution and bear a disproportionate burden of increasing health risks.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook,¹¹ South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2022 Air Quality Management Plan,¹² and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy.¹³

Mitigation measures for operational air quality impacts from mobile sources that the Lead Agency should consider in the Draft EIR may include the following:

- Require zero-emissions (ZE) or near-zero emission (NZE) on-road haul trucks such as heavy-duty trucks with natural gas engines that meet the CARB's adopted optional NOx emissions standard at 0.02 grams per brake horsepower-hour (g/bhp-hr), if and when feasible. Given the state's clean truck rules and regulations aiming to accelerate the utilization and market penetration of ZE and NZE trucks such as the Advanced Clean Trucks Rule¹⁴ and the Heavy-Duty Low NOx Omnibus Regulation¹⁵, ZE and NZE trucks will become increasingly more available to use. The Lead Agency should require a phase-in schedule to incentivize the use of these cleaner operating trucks to reduce any significant adverse air quality impacts. South Coast AQMD staff is available to discuss the availability of current and upcoming truck technologies and incentive programs with the Lead Agency. At a minimum, require the use of 2010 model year¹⁶ that meet CARB's 2010 engine emissions standards at 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks. Include environmental analyses to evaluate and identify sufficient electricity and supportive infrastructures in the Energy and Utilities and Service Systems Sections in the CEQA document, where appropriate. Include the requirement in applicable bid documents, purchase orders, and contracts. Operators shall maintain records of all trucks associated with project construction to document that each truck used meets these emission standards, and make the records available for inspection. The Lead Agency should conduct regular inspections to the maximum extent feasible to ensure compliance.

¹¹ <https://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>

¹² South Coast AQMD's 2022 Air Quality Management Plan can be found at: <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan> (Chapter 4 - Control Strategy and Implementation).

¹³ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at:

https://www.connectsocal.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.

¹⁴ CARB. June 25, 2020. *Advanced Clean Trucks Rule*. Accessed at: <https://ww2.arb.ca.gov/our-work/programs/advanced-clean-trucks>.

¹⁵ CARB has recently passed a variety of new regulations that require new, cleaner heavy-duty truck technology to be sold and used in state. For example, on August 27, 2020, CARB approved the Heavy-Duty Low NOx Omnibus Regulation, which will require all trucks to meet the adopted emission standard of 0.05 g/hp-hr starting with engine model year 2024. Accessed at: <https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox>.

¹⁶ CARB adopted the statewide Truck and Bus Regulation in 2010. The Regulation requires diesel trucks and buses that operate in California to be upgraded to reduce emissions. Newer heavier trucks and buses must meet particulate matter filter requirements beginning January 1, 2012. Lighter and older heavier trucks must be replaced starting January 1, 2015. By January 1, 2023, nearly all trucks and buses will need to have 2010 model year engines or equivalent. More information on the CARB's Truck and Bus Regulation is available at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>.

- Limit the daily number of trucks allowed at the Proposed Project to levels analyzed in the Final CEQA document. If higher daily truck volumes are anticipated to visit the site, the Lead Agency should commit to re-evaluating the Proposed Project through CEQA prior to allowing this higher activity level.
- Provide electric vehicle (EV) charging stations or, at a minimum, provide electrical infrastructure and electrical panels should be appropriately sized. Electrical hookups should be provided for truckers to plug in any onboard auxiliary equipment.

Mitigation measures for operational air quality impacts from other area sources that the Lead Agency should consider in the Draft EIR may include the following:

- Maximize use of solar energy by installing solar energy arrays.
- Use light colored paving and roofing materials.
- Utilize only Energy Star heating, cooling, and lighting devices, and appliances.
- Use of water-based or low VOC cleaning products that go beyond the requirements of South Coast AQMD Rule 1113.

Design considerations for the Proposed Project that the Lead Agency should consider to further reduce air quality and health risk impacts include the following:

- Clearly mark truck routes with trailblazer signs, so that trucks will not travel next to or near sensitive land uses (e.g., residences, schools, day care centers, etc.).
- Design the Proposed Project such that truck entrances and exits are not facing sensitive receptors and trucks will not travel past sensitive land uses to enter or leave the Proposed Project site.
- Design the Proposed Project such that any check-in point for trucks is inside the Proposed Project site to ensure that there are no trucks queuing outside.
- Design the Proposed Project to ensure that truck traffic inside the Proposed Project site is as far away as feasible from sensitive receptors.
- Restrict overnight truck parking in sensitive land uses by providing overnight truck parking inside the Proposed Project site.

On May 7, 2021, South Coast AQMD's Governing Board adopted Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program, and Rule 316 – Fees for Rule 2305. Rules 2305 and 316 are new rules that will reduce regional and local emissions of nitrogen oxides (NOx) and particulate matter (PM), including diesel PM. These emission reductions will reduce public health impacts for communities located near warehouses from mobile sources that are associated with warehouse activities. Also, the emission reductions will help the region attain federal and state ambient air quality standards. Rule 2305 applies to owners and operators of warehouses greater than or equal to 100,000 square feet. Under Rule 2305, operators are subject to an annual WAIRE Points Compliance Obligation that is calculated based on the annual number of truck trips to the warehouse. WAIRE Points can be earned by implementing actions in a prescribed menu in Rule 2305, implementing a site-specific custom plan, or paying a mitigation fee. Warehouse owners are only required to submit limited information reports, but they can opt in to earn Points on behalf of their tenants if they so choose because certain actions to reduce emissions may be better achieved at the warehouse development phase, for instance the installation of solar and charging infrastructure. Rule 316 is a companion fee rule for Rule 2305 to allow South Coast AQMD to recover costs associated with Rule 2305 compliance activities. Since the Proposed Project consists of the development of a 5,613,600-square-foot warehouse (maximum buildout), the Proposed Project's warehouse owners and operators will be required to comply with Rule 2305 once the warehouse is occupied. Therefore, South Coast AQMD staff recommends that the Lead Agency review South Coast AQMD Rule 2305 to determine the potential WAIRE Points Compliance Obligation for future operators and explore whether additional project requirements and CEQA mitigation

measures can be identified and implemented at the Proposed Project that may help future warehouse operators meet their compliance obligation¹⁷. South Coast AQMD staff is available to answer questions concerning Rule 2305 implementation and compliance by phone or email at (909) 396-3140 or waire-program@aqmd.gov. For implementation guidance documents and compliance and reporting tools, please visit South Coast AQMD's WAIRE Program webpage¹⁸.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at swang1@aqmd.gov.

Sincerely,

Sam Wang

Sam Wang
Program Supervisor, CEQA IGR
Planning, Rule Development & Implementation

SW
RVC240507-01
Control Number

¹⁷ South Coast AQMD Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>.

¹⁸ South Coast AQMD WAIRE Program. Accessed at: <http://www.aqmd.gov/waire>.

From: [Amber Foley](#)
To: [Carole Kendrick](#)
Subject: Beaumont Heights
Date: Thursday, May 16, 2024 7:40:58 PM

No! Just no! Our city cannot handle more traffic! We need infrastructure FIRST! Pennsylvania needs to go over or under the tracks. There needs to be another route in and out of 2nd street. Schools are overcrowded. Get it together Beaumont. Our city crumbles when a train stops on the tracks. What happens in a major emergency? We get stuck! Bad planning is affecting this town. No more warehouses! No more houses! Infrastructure first!
Amber Foley

From: bernard.newcomer@gmail.com
To: [Carole Kendrick](#)
Subject: Beaumont Heights (Not In Favor)
Date: Thursday, May 16, 2024 6:08:19 PM

Hello Ms. Kendrick,

Can you please log my “not-in-favor “ for the upcoming proposed Beaumont Heights project?

Thank you,

Bernard Newcomer

343 Song Bird, Beaumont CA 92223

Email- bernard.newcomer@gmail.com

Sent from my iPhone

Dear Beaumont Planning Commission,

Thank you for all you do for the city of Beaumont. Thank you for your time and commitment to the citizens who live here and for making Beaumont a great place to live. My husband, my 3 kids and I moved to Beaumont almost 4 years ago. We have truly loved living here. However, we are very concerned about plans to build four giant warehouses at the top of Lamb's Canyon. Having read through the plans, it seems there are little to no benefits of this building project for the city but there are many negatives that would come from it.

- The land proposed for this site is outside the city limits in an area zoned for agriculture. Part of the land is identified as "Farmland of Local Importance." This seems like too far of a jump for the area and the surrounding area to swing from zoning as agricultural to a massive commercial project. The city would annex this portion of land with the sole intention to destroy any potential for future agricultural work.
- The air quality would be affected short term by the crews building the warehouses and long term by the constant emissions of hundreds of large semi-trucks constantly coming and going from the warehouse.
- The environmental impact would be massive. There are protected animals who live in this area, including burrowing owls and kangaroo mice. This land also houses many historical sites of homes that were built a hundred years ago. Foundations and artifacts would have to be destroyed in order to accommodate the warehouse project.
- Light pollution and noise pollution would have an impact on citizens living anywhere near this project. The warehouse is intended to operated 24 hours a day, 7 days a week giving no relief in the loading and unloading of trucks as well as the coming and going of these trucks.
- The proposed location has no easy access to the Freeway. The proposed direction of the semi-trucks to reach the warehouse is California Avenue, a tiny street lined with homes and power poles. This is not sustainable for the hundreds of semi-trucks that would be coming to the facility. The alternative to California Avenue is the trucks using the overpass on Beaumont Avenue. The triangular stretch of streets from California Avenue to First Street to Beaumont Avenue is the busiest section of our city. Every morning and every afternoon these streets become congested with traffic. If this proposed

warehouse became a reality, there would be hundreds of more semi-trucks navigating these streets. Additionally, the proposal is estimating 6,000 workers needed in the warehouses. So that means an extra 6,000 cars will also be added to the streets as workers come and go. This would be a nightmare to try to navigate on a regular day, let alone if a train backs up traffic as frequently happens. It seems like a dangerous decision to add so many vehicles to a section that is already so congested and crowded.

- One of the best parts of Beaumont that my family has enjoyed is the small town feeling it has. This is a rarity nowadays. Beaumont has a great section of businesses as well as a balance of parks and areas of recreation. This warehouse project would change our small town in so many negative ways. Gone would be the rolling hills as you enter the city from the south. Instead, would be a fortress of concrete and parking lots. This project effects not only those living in Beaumont now, but the future generations of men and women who will live here. What kind of Beaumont do we want to pass down to our children? Do we want Beaumont known for its small-town charm and care for its citizens? Or as a warehouse capital?

In my opinion, this project is a puzzle piece that doesn't fit. There are too many negatives and downfalls to these warehouses. The city may gain more tax revenue from it (as it already does from the existing warehouses) but that money would be at the expense of the citizens who live here already. I plead that you all, as elected officials who strive to make decisions for the betterment of Beaumont and for the families who call this town home, please stop this project.

Sincerely,

Jennifer Cervantez

From: [Mary Daniel](#)
To: [Carole Kendrick](#)
Subject: Comments on the NOP for the proposed warehouse on Hwy79
Date: Friday, May 31, 2024 2:52:10 PM

Hi Carole: Please add these comments to the NOP Thank you.

I am against this proposed warehouse development for several reasons. First and foremost, it is a dreadful project planned for an inappropriate area. And how do I know that the area is inappropriate and unsuitable? It's simple! This monstrosity would require a revision of the City of Beaumont's General Plan in order to allow it to be built. This General Plan was made only a couple of years ago at the cost of \$800,000. It is supposed to be the blueprint for the way the city grows during the next several decades. The plan was carefully discussed and evaluated before it was approved and it is meant to protect the citizens of Beaumont against out-of-the-area developers such as this one from Newport Beach – who are looking for a quick buck and a swift profit. A General Plan should only be revised for an outstanding and notable reason – and then only if the project provides a recognizable benefit to the citizens of Beaumont. Again – this is not that project.

I would like to bring to your attention **Policy 5.1.8** of the General Plan where it states that the city will ***“align ...economic growth and business attraction in the existing commercial and industrial areas.”*** Therefore, there is absolutely no valid reason to allow this warehouse development to proceed off Highway 79 since the land south of I-60 has already been established and zoned as an industrial region. If this developer wants to build a warehouse – let him purchase land there.

Since this project would also require annexation into the city of Beaumont, I will state right here that there is no current reason that our family would consider the annexation of our family ranch. This means that our property would be an island between this proposed warehouse and the city's boundary line. It is my understanding that LAFCO does not support this type of annexation.

Other reasons that this proposed eyesore is inappropriate and unsuitable concerns the environmental issues that this monstrosity will negatively and significantly impact. In many of the environmental topics that must be addressed in the EIR, the developer states that this mammoth warehouse ***“could” or “might”*** result in some major impacts to the local environment. Let me say right here that there is no *Could or Might* about it. This warehouse ***WILL*** result in those significant impacts and there is no getting around that fact.

The project will result in adverse visual impacts with those 50' high buildings being the first thing that drivers see when they are coming into Beaumont from the south. Let's face it there really is no way to camouflage or disguise several

massive square boxy buildings built right in the middle of scenic open space.

Sensitive biological habitats will be disrupted when the hills are bull-dozed and agricultural land of significant importance will be obliterated.

Most significantly, this project will result in negative air quality impacts along with increased greenhouse gas emissions with its hundreds of daily truck trips running 24/7. Usually, the developer is aware that there are no mitigations to offset this negative impact – and they will state in the EIR that the citizens of the area simply need to just accept it. But that isn't true – the project can be rejected.

And finally, the project will result in making an already horrendous traffic situation on Hwy 79 many times worse with its 1399 trailer stalls and proposed 6500 employees! I find it hard to believe that any overriding consideration or economic return to the city of Beaumont can offset these significant negative impacts to our environment and quality of life.

Thank you Carole and please keep us posted. Mary Daniel

From: [Nick Cervantez](#)
To: [Carole Kendrick](#)
Subject: Response to Notice of Preparation - Beaumont Heights Business Center
Date: Thursday, June 6, 2024 4:23:56 PM

Beaumont Planning Department,

I spoke at the initial planning meeting but wanted to submit my full response outlined below.

Thank you for the opportunity to speak regarding our community's future.

I want to start with my perspective and why the plan for expansion of mega warehouses South of Beaumont and specifically in the Lamb Canyon area is not only a poor business choice but also a net loss for our community and at its worst a danger.

I grew up in the Hemet/San Jacinto valley. Back then we spent a large amount of time exploring the wild and remote areas surrounding us. In my exploring I stumbled upon the Potrero Valley. The Potrero Valley in my opinion is the most beautiful natural resource in the county of Riverside. From its sprawling grasslands to unique rock formations, it remains a hidden gem that few know of. When the opportunity to purchase 2 parcels of land within the Lamb Canyon area of the Potrero Valley we jumped on it with the intent of establishing small family run agriculture operation with focus on modern sustainable farming. The location was ideal, the zoning was right, and the land was beautiful.

The rolling hills South of Beaumont are the backdrop of Beaumont's identity and history. They provide the natural geographic separation between cities that makes rural life in Riverside County so pleasant. As we see now in Perris, Riverside, Moreno Valley, Cherry Valley and our very own west side of Beaumont that is changing. The accelerated pace of commercial mega warehouses is not slowing and only pushing inward until they blockade residential communities. At its current pace we stand to look like Fontana or San Bernardino in a few short years. The busy streets with endless commercial traffic, noise and smog.

Are we wanting to trade the natural beauty of our land to what they have? I would hope not.

There are many reasons why this proposed plan is fundamentally flawed, here are a few:

1. Loss of Identity:

- Bulldozing the rolling hills and replacing them with concrete mega warehouses will kill the soul of our community and lock the city within a concrete cage of commercial development.

2. Misaligned Land Use:

- The land is currently designated as Rural Community and Rural Mountainous, which aligns with the area's character. Mega warehouses do not fit this responsible use of our land resources.

3. Traffic Nightmare:

- These mega warehouses will require 24/7 commercial traffic in Lamb Canyon, compounding the existing nightmare for commuters heading into Beaumont.
- The existing warehouses to the west lack proper onramps or offramps to the 60 or 10 Freeways. The incomplete Potrero bridge strains traffic conditions on Potrero Blvd, 4th St, Veile Ave, and California Ave.
- Even without considering the frequent gridlock caused by passing trains, the current traffic conditions frequently back up California Ave all the way to Beaumont Ave.
- Introducing a high concentration of commercial traffic would intensify safety risks throughout the canyon, especially when combined with the area's frequent low fog.
- Proper infrastructure must be in place before opening large commercial developments to avoid burdening the local community.

4. Impact on Retail District:

- Many visitors from the Hemet/San Jacinto valley frequent the 2nd St retail district for dining and shopping. This plan would significantly worsen the already poor traffic conditions, potentially deterring customers from choosing this area for business.

I plead with the planning commission, city council, and any other potential approving agency to strike down this proposal.

Thank you,

Nicholas Cervantez

951-790-2719

June 6, 2024

To:

Carole Kendrick
Planning Manager
City of Beaumont
550 East 6th Street Beaumont CA, 92223
ckendrick@beaumontca.gov

From:

Ronald Roy
35161 Hogan Dr.
Beaumont, Ca. 92223

Re:

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
BEAUMONT HEIGHTS PROJECT

To whom it may concern:

Please address the following concerns I have about the project:

**PROJECT IS INCOMPATIBLE WITH THE SURROUNDING LAND USES
AND SHOULD BE DENIED. IT CANNOT BE AN INDUSTRIAL WAREHOUSE
PROJECT.**

What drives visitors and residents to Beaumont is its unique characteristics: Unmatched scenery, natural beauty, history of clean-air and skies, quiet, bucolic character, well planned and notable residential communities. Included here are 5 large-scale Pass Area 55+ communities, nearest being Four Seasons, representing over 35% of the population, and comprised of the most vulnerable sensitive receptor group: Seniors. Only children are considered more vulnerable sensitive receptors than seniors. Warehouses by their very design and operations, are arguably the worst type of land use in Beaumont. The land use is extremely intensive and disruptive. Massive buildings obliterate historic and iconic natural vistas. Thousands of daily trucks will overwhelm the surrounding street and

interchange system which does not have the capacity. Trucks will conflict with existing and regional traffic, causing a permanent traffic blight, with daily traffic jams/backups, diesel soot emitting from trucks, not just from the project site, but also.

Above all the pollution effects of these warehouses will cause asthma, lung and heart diseases. At almost 6 million square feet, the cumulative effects of these warehouses, will make Beaumont a high health-risk community matching or exceeding those in the Redlands and San Bernardino Valleys, Moreno Valley, and beyond.

ESSENTIAL GOALS:

Best solution: deny the project in its totality:

However, should the city council not do to what is clearly the best option for this project, a unanimous denial, then achieve the following goals:

1. Beaumont Residents do not want to:

- **See** any part of the project, first-and-foremost, the massive high-cube warehouses should be completely hidden from view from at-least following vantage points:
 - SR 79
 - California Ave.
 - 1st Street
 - Seneca Springs Housing Development
 - Four Seasons Housing Development
- **Hear** any noise from the project. No noise pollution
- **See** any lights, or light emissions, glare from the project. No light pollution from project.
- **24/7** operations
- **Breath in** any air or other pollutants, GHG from emissions from diesel soot, tire debris.
- **Trucks** and project vehicles disrupting, conflicting with traffic on all streets within a 5 mile radius of the project.

2. **Change the land use** from industrial to a more suitable, less intensive land, community compatible land use

ISSUES OF CONCERN:

⇒ BEAUMONT P.L.U.S POLICY

- 1000 ft. buffer: The project is in violation of the 1000 ft. buffer policy, especially for the former Merv Griffin Child Help property, Seneca Springs housing development, and Four Seasons 55+ complex. Project needs to reduce its building footprint, and/or move buildings farther away to reduce impact on sensitive receptors. Discuss how you will implement these options, as well as any other means of mitigations here.
- On an item-by-item basis, how is project complying with all other elements of the PLUS policy?

⇒ WAREHOUSE BUILDING SIZES/SCALE

- Buildings are much too massive and out of scale with surrounding residential communities.
- Suggested mitigations:
 - Reduce building floor area ratio (FAR) to the overall industrial site to 60% building sq.ft to total site. Compare existing (6/6/2024) Conceptual Development Site Plan (CDSP) to a revised CDSP showing 60% FAR.
 - Set cap on building sizes. Show visual simulations of building CAPs at 250,000 sq.ft. per building, and 500,000 sq.ft per building. Show these changes in revised CDSP and visual simulations.
 - Cut-into, recess buildings into the hillsides, so that no more than 25% of buildings are visible above the original hillside slope.

⇒ **TRAFFIC IMPACT: TRAFFIC CONGESTION**

SR 79

SR 79 is currently a 4 lane road that's already heavily congested as it's a preferred route to reach Hemet/San Jacinto Valley, Temecula Valley, and San Diego County, for I10 travelers from Coachella Valley, Redlands/San Bernardino Valley and Los Angeles County.

- Show the existing hourly and daily traffic flows (include both LOS and VMT), 24 hours per day/7 days per week, for all area streets and roads within a 5 mile radius of the project, including SR79 24 from I10 to Ramona Expressway (San Jacinto), California Ave. and 1st Street). Provide separate data table showing existing hourly traffic flows (LOS and VMT) on Friday's, Saturdays, hours per day, 7 days per week
- Show how the project trucks and other vehicles will change traffic flows on SR79 from north of I10 Interchange to Ramona Expressway. Include the following intersections:
 - Beaumont Ave/6th Street (north of I10)
 - Beaumont Ave/5th Street (north of I10)
 - SR 79/I10 Interchange (including off ramps, on ramps, left turn signal on Beaumont Ave/I10 Overpass)
 - SR 79 (Beaumont Ave.)/Luis Estrada Rd.
 - SR79/1ST Ave.
 - SR 79/ California
 - SR 79/ Lamps Canyon Rd. (Landfill entrance)
 - SR 79/ Gilman Hot Springs Rd. (San Jacinto)
 - SR 79/Ramona Expressway (San Jacinto)
- What steps are the applicant taking to mitigate the increased traffic congestion caused by the project vehicles on SR79 from I10 interchange to Ramona Expressway? Include mitigations for all of the aforementioned intersections.

First Street:

First Street experiences extreme traffic congestion, often stand-still traffic backing up for miles (such as weekday and Friday afternoons and weekends), from the following intersections:

- 1st Street/Viele Ave
 - 1st Street/California Ave
 - 1st Street/Beaumont Ave.
 - 1st Street/Pennsylvania Ave.
 - 1st Street/Commerce Way
 - 1st Street/Highland Springs Ave.
-
- Show how the project trucks and other vehicles will change traffic flows (include both LOS and VMT) for 1st Street from Viele Ave to Highland Springs Ave, including the aforementioned intersections.
 - What steps are the applicant taking to mitigate the increased traffic congestion caused by the project vehicles.

What is the current LOS of the project site and what will the LOS changes look like with the proposed project?

For example, need to identify LOS impacts **throughout the day, 24/7** for:

- 1st Street from Viele Ave to Highland Springs Road.
 - Including all intersections along this route including Viele Ave, California Street, Beaumont Avenue,
- 1, 3rd Street, Pennsylvania Ave/3rd Street Intersection, Pennsylvania Avenue,

APPLICANT NEEDS TO RECONFIGURE SITE AND BUILDING PLAN TO CREATE SAFER, LESS CONGESTING TRAFFIC FLOWS/INGRESS AND EGRESS FOR THE PROJECT:

⇒ **MULTI-MODAL TRANSIT**

- Active transportation: How much right-of-way on 1st street and 3rd street will be added to accommodate cycling, pedestrian, equestrian, hiking/running and other active transportation?
- Need to add bike-lanes within the projects on-site vehicular/truck infrastructure (driveways, parking spaces, loading docks, interior spaces)
- Building is approximately 3 times the size of a Costco.
- How is applicant mitigating to allow for more public transit to the project?

⇒ **TRUCKS:**

- What are the estimated number of trucks that will use the facilities daily. Include entering, exiting, and idling and parking.
- What are the estimated truck trips per day.
- Will are the hours of the facilities operations? Will they be 24 hours per day, 7 days per week or some other hourly schedule? Hours should be capped.
- What is the estimated GHG (including diesel soot) and other emissions on a per truck basis (for each truck) and or trailer (refrigeration trailer).
- What is the estimated GHG (including diesel soot) for all trucks in facilities on a per-hour basis, and a per-day basis.

⇒ **TRUCK ROUTES:**

⇒ Applicant needs to identify the truck routes, the project trucks will take to circulate throughout Beaumont, SR79, Banning, Calimesa and the Pass Area.

⇒ What truck routes will the trucks use to get onto I10 and I60 for both westbound and eastbound traffic?

⇒ How will trucks and vehicular traffic access the Beaumont Area interchanges along I10?

- Highland Springs
- Pennsylvania
- Beaumont Ave

- Oak Valley
- Potrero
- Cherry Valley

⇒ How will trucks use SR79 to-and-from San Jacinto/Hemet Valley?

⇒ Would the applicant be willing to make off-site road improvements, or contribute fees to create an effective truck-route from the project site the above referenced areas.

⇒ **QUIETING AND OTHER STREET DESIGN MITIGATION MEASURES:**

- Provide/put forth designs showing how, given the massive increase and influx of conflicting onsite truck and vehicular traffic, how project design, and nearby street system will be modified to allow for less conflicts, congestion, idling/queueing of on-site trucks/vehicles, and between on-site trucks/vehicles and traffic and adjacent and nearby traffic.

⇒ **INCORPORATE LATEST STANDARDS:**

- Electric Charging Stations
- Renewable fuel stations
- Interior Climate control
- Break rooms, bathrooms, kitchen and dining areas, child care
- Leed Platinum Standard.
- Insulation
- Solar Panels.
- All on-site equipment must be electric.
- Allow only electric/renewable trucks

⇒ **SPEC OR BUILD TO SUIT:**

- Is this project being built for a secured client?
- Is this a spec build?

⇒ **WHAT KIND OF WAREHOUSE USE IS ANTICIPATED?**

Confirm or say why cannot confirm: What's the market conditions?

- Cold-Storage, Refrigeration
- Fulfillment Center: handle online orders
- Distribution Center: moves products around
- Storage warehouse: keeps stuff long-term
- Traditional
- Automated
- Cross-Dock
- Consolidated Warehouse
- Hazardous Materials?

⇒ **WHAT KIND OF LOCAL GOVERNMENT REVENUES** will be generated from this project besides property taxes? Will the applicant guarantee that Sales tax be generated from this warehouse? If so in what way. A CFD?.

- Suggestion Create **CFD** based on a percentage of Annual Project Lease Revenues (APLR): Suggest 2.5% of APLR
- This creates more stable, durable municipal revenue source than sales tax. Sales Tax revenues cannot be guaranteed for any of the 4 warehouse buildings. Sales tax estimates tend to be highly unreliable, speculative, and misleading to residents. Studies must show the variations in sale tax revenue streams for all Pass Area warehouses.
- Sales Tax market is highly variable and volatile. Need data on 5-10 year sales tax history and trends for more accurate, area specific Pass Area warehouses.
- Provide a Pass Area Map and Tables showing all existing and proposed warehouses, and what kind of, if any, revenue stream is generated for each warehouse. Residents need accurate financial data here, to avoid erroneous budgeting decisions.

⇒ **ENERGY EFFICIENCY:** How will the applicant implement Energy Efficiency Development Criteria?

How will development within the project be energy efficient in conformance with the criteria from the City of Beaumont Climate Action Plan. How will the Developer recognize that the technological and methodological specifications in the criteria could become obsolete in the future due to advancement over time. In that event, how will the applicant implement new technologies and methodologies to achieve better environmental protections.

The applicant needs to do the following:

1. Energy Efficient Structures

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

b. Modest Cool Roofs with CRRC Rated 0.15 aged solar reflectance, 0.75 thermal emittance, etc. shall be provided.

c. at least 20% of the power needs of each building shall be provided by Solar Photovoltaic panels or wind, installed on buildings or in collective arrangements.

d. California Commercial Building Code allows for earthen roofs. This highly energy efficient design, is very well suited for the hillside site. Cut-and-fill, cut-and-cover methods can recess buildings into hillside (maximum of 25% of building visible), and existing soil can be used for the earthen roof cover. Done right, this achieves the goal: Residents don't want to see the buildings. Also embedding buildings into hillsides with earthen roof cover achieves remarkable insulation and climate control, significantly reducing heating/cooling/electricity costs, especially during the extreme Pass Area Seasons in Winter, Summer. Hidden earthen buildings also helps in wildfire prevention.

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 shall be provided throughout all parts of the building where personnel or visitors operate or visit, including material handling/sorting areas, locker-rooms, bathrooms, break rooms, , offices, kitchens, child-care recreation, fitness all other areas where personnel will be operation. Climate control must be able to achieve interior temperatures within 68-76 degrees Fahrenheit. 24 hours per day, 365 days per year.

c. Office space heating within warehouses shall utilize heat pumps with ducting insulation of R-4.2 or greater.

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.
- c. 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.

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. Public Transit Stops

e. EV charging stations shall be installed in employee garages/parking areas.

f. 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 exceedance of the City of Beaumont Idling Ordinance.

FIRE PREVENTION:

The hills surrounding this site have a history of frequent wildfires, the most recent in 2023. Also warehouse design and the goods inside create unique fire dangers for occupants/workers/visitors to the warehouses.

Provide detailed plans for how fire's will be prevented including:

- Fire Suppression systems and procedures
 - Suppressing nearby hillside wildfires
 - Monitoring wind, temperature, and other indicators that lead to increased fire risk.

- Warehouse storage design and goods create a stacked “charcoal” effect where compressed goods, ignite and can burn for hours, even after attempts to extinguish external goods surfaces. Need much more analysis from our fire department/fire marshall, or better yet: a trusted firm who specializes in the latest fire suppression systems and methods for high-cube warehouses.
- Demonstrate how any fire department/fire marshall study or recommendations any conflict of interest. This is necessary because resident’s realize that fire departments are promised millions of dollars in salaries and facility upgrades from developers, which can be a biased incentive to approve these projects.

BUILDING SIZE/FLOOR AREA RATIO:

To create safer emergency access and more convenient access, show scenario of reduced building size and what building layout would look like with a 60% floor area ratio (FAR). Lowering the FAR and capping the building sizes to say, 250,000 sq.ft. creates more opportunities to create or preserve open space amenities, such as pedestrian or jogging trails, bike lane network throughout the project, parks, shaded outdoor picnic and break areas, children resources such as day-care, schools, sports facilities, etc.

BUILDING DESIGN:

This looks like a typical “big-box”, high-cube, tilt-up warehouse building with walls that will likely exceed 50’ in height. Avoid making entire sides of buildings one flat surface. Create interesting undulations, reliefs and protrusions for building facades How will the applicant design the buildings and grounds to create more interesting shapes, variety in the exterior shapes, wall surface (relief murals)? **Please use paint color that matches the natural landscape of the area**, such as pleasing earth-tones, but not white, grey or pantones close these colors. Also decorative walls? Where are the green spaces for workers/visitors to relax. Minimize the use of concrete/asphalt for the driveways, roads, parking. Need to increase pedestrian walkways and bike lanes within the site. Also need substantial shade trees, benches etc.

PROVIDE ALTERNATIVE LAND USES FOR COMMUNITY COMPARISON

- Retail
- Outdoor recreation
- Community Center
- Open Space Recreation
- Sports fields, aquatic center
- Hospitality Resort
- County or State Park (BCVRPD? County Parks?, State Parks?) Etc.
- Entertainment. Studio: Expand State Film Tax Credit to include Pass Area.
- Identify historically significant sites and incorporate their significance in project design, amenities, and public awareness.

DO A THOROUGH ALTERNATIVE SITE OPTION ANALYSIS PER CEQA

IT WOULD BE NICE TO SEE:

I long for a Smart & Final Extra or a Bass Pro-Shop and Sports-Recreation retailers/wholesalers/manufacturers. Affordable bike manufacturer?

The right kind of Manufacturing. No more Cold-Storage, Refrigeration, Distribution, Storage, Traditional warehouses

I hope the applicant can find a land use which is compatible with the community's interests.

Thank you
Ronald Roy

PS: I reserve the right to submit additional comments at a later date.