
Santa Ana Regional Water Quality Control Board

August 12, 2026

VIA EMAIL ONLY: marchiga@beaumontca.gov

Melody Arechiga
City of Beaumont
550 E. Sixth Street
Beaumont, CA 92223

**BEAUMONT HEIGHTS BUSINESS CENTRE PROJECT, DRAFT ENVIRONMENTAL
IMPACT REPORT (STATE CLEARINGHOUSE NO. 2024050220), RIVERSIDE
COUNTY**

Dear Melody Arechiga:

Santa Ana Regional Water Quality Control Board (Santa Ana Water Board) staff have reviewed the Draft Environmental Impact Report (DEIR) for the Beaumont Heights Business Centre Project (Project). The Project totals approximately 629.27 acres, consisting of 385.60 acres of onsite development and 243.67 acres offsite, including staging and earthwork balancing areas. The Project is located in the City of Beaumont, east of State Route 79 (SR-79), south of Laird Road, and north of the Potrero Reserve. The Project proposes to develop approximately 5,182,891 square feet of combined office and industrial area and associated improvements.

Santa Ana Water Board staff are providing the following comments on the DEIR for your consideration.

Comment # 1:

The mission of the Santa Ana Water Board includes the preservation, enhancement, and restoration of the quality of California's water resources for the protection of the environment and all beneficial uses for the benefit of present and future generations.

In accordance with the Porter-Cologne Water Quality Control Act (Water Code, § 13000 et seq.), the Santa Ana Water Board is authorized to regulate discharges of waste, including discharges of dredged or fill materials that may affect the quality of waters of the State within the Santa Ana River Watershed.

Comment # 2:

The Project site consists generally of vacant land with no substantial development. The northern portion of the Project site is generally flat and consists of non-native grassland/ruderal vegetation, and the southern portion is characterized by several

JOHN SCANDURA, CHAIR | ERIC LINDBERG, EXECUTIVE OFFICER

ridgelines and valleys. The southwestern portion of the site consists of large boulders and rock outcroppings. Several ephemeral drainages traverse the western and southwestern Project area and ultimately flow offsite towards the San Jacinto River.

Comment # 3:

According to Section 5.3.1 Existing Settings for Biological Resources under Non-Jurisdictional Topographic Features (p.161), steep, undulating topography is present on the Project site, consisting of numerous steep narrow valleys between sharp peaks, which have the potential to be jurisdictional features if signs of flow are present. Most of the steep valleys were determined to be non-jurisdictional due to the lack of signs of flow and/or an ordinary high water mark. According to the DEIR, these features did not contain a defined bed and bank or ordinary high water mark, but rather a steep, vegetated crevice between two peaks. Since no signs of regular flow were observed, these crevices were determined to be non-jurisdictional topographic features.

The DEIR fails to provide a detailed description of the topographic features, and specific lines of evidence were used to determine the presence or lack of an ordinary high water mark or hydrology indicators. The ordinary high water mark is identified by physical characteristics that correspond to fluctuations of water. The physical characteristics include geomorphic, vegetation, sediment, and other physical indicators. However, no specific type of physical characteristic must be present to make an ordinary high water mark determination (USACE 2005).

Arid systems, such as southern California, do not have continuous surface flows, and there is greater variability in the types of flows that leave physical hydrological indicators. In addition, lateral confinement of a stream channel can occur from natural landforms, such as hillslopes and fluvial terraces (Fryirs et al. 2016). The more confined or incised a stream channel is, the more likely it will deepen during high flows, tending to be straighter and steeper. Depending on the time of the field visit, physical characteristics like slope breaks can be obscured by fast-growing vegetation, or without any recent high flows, vegetation may have had time to establish.

Based on the information provided above, Santa Ana Water Board staff recommend that the EIR include spatial and hydrologic information relevant to the landscape and streamflow, including vegetation and sediment, to understand the relevance and reliability of determining the presence or lack of an ordinary high water mark or hydrology indicators.

Comment # 4:

The Project includes a 243.67-acre offsite area (referred to as "Construction Staging/Earthwork Balance Areas"). The southern 182.14-acre offsite area is proposed for temporary construction staging and earthwork balance activities; no permanent development is proposed in this portion of the site. The remaining 61.53 acres involve transportation improvements along SR-79 and utility installation along California Avenue and east of the Project site.

The DEIR fails to provide sufficient information on the proposed activities within the “Construction Staging and Earthwork Balance Areas”. It is unclear whether impacts to water or biological resources associated with the offsite areas were analyzed. Given the Project’s proposed 5-year schedule, construction staging and earthwork activities have the potential to directly or indirectly impact water resources.

Santa Ana Water Board staff recommend that the EIR include additional information for the proposed activities within the “Construction Staging/Earthwork Balance Area” and identify resource-specific avoidance and minimization measures that were evaluated to reduce potential impacts.

Comments # 5:

A preliminary hydrology report (Appendix 11.5 Hydrology Study/WQMP) was prepared as part of the DEIR. The purpose of the hydrology report is to analyze the existing onsite and proposed hydrology conditions and cumulative flow rates.

It is unclear if the hydrology report analyzed proposed hydrology conditions associated with the offsite transportation/utility improvement areas. Santa Ana Water Board staff recommend that the EIR and hydrology report evaluate the existing and post-construction hydrology conditions for the offsite areas.

Comment # 6:

According to DEIR, a total of 0.71 acres of non-wetland waters of the State under the Santa Ana Water Board jurisdiction are present within the Project site. Under Mitigation Measure BIO-7, permanent impacts to riverine resources will be mitigated through purchase of offsite re-establishment and/or rehabilitation credits at a 2:1 ratio (impact:mitigation) from the Riverpark Mitigation Bank or another approved bank.

As mentioned in the comments above, the DEIR does not adequately identify the Project’s significant or potentially significant impact on water resources. Therefore, Santa Ana Water Board staff are unable to assess if mitigation measure BIO-7 is sufficient to reduce impacts on water resources to less than significant. Additionally, as of the date of this letter, the Riverpark Mitigation Bank may not have available mitigation credits for sale.

Santa Ana Water Board staff recommend the EIR fully evaluate and quantify all impacts to water resources to determine whether the proposed mitigation measures fully offset impacts to waters of the State. Additionally, recommend that the final EIR includes information demonstrating the sequence of actions that were taken to avoid, minimize, and lastly compensate impacts to waters of the State.

Comment # 7:

According to Section 5.6.5 Cumulative Impacts (p. 273), the implementation of the Project would not result in a substantial cumulative contribution to water quality impacts, and impacts would be less than significant. The DEIR acknowledges the cumulative impacts associated with other projects could alter drainage patterns in the watershed,

August 12, 2026

resulting in substantial erosion/siltation and/or flooding. However, according to the DEIR, cumulative development would require site-specific hydrological impacts on a project-by-project basis. The DEIR determined that the Project impacts would be less than significant with no mitigation measures required due to adhering to project-specific water quality management plans.

CEQA Guidelines Section 15355 requires an analysis of cumulative impacts, which are defined as “two or more individual effects which, when considered together, are considerable, or which compound or increase other environmental impacts.” The DEIR failed to analyze impacts to water resources when combined with other proposed projects within the area. Santa Ana Water Board staff recommend that the final EIR consider the cumulative impacts to water quality and beneficial uses, including drainage patterns within the Project vicinity.

If you have any questions regarding this letter, please contact Cassidy Lunetta via email at: Cassidy.Lunetta@waterboards.ca.gov.

Sincerely,

Claudia Tenorio

Claudia Tenorio
Senior Environmental Scientist (Supervisory)
Regional Planning Programs Section
Santa Ana Regional Water Quality Control Board

cc:

Orbis Real Estate Partners – Asia Reeves – AReeves@orbisrep.com
Michael Baker International – Frances Yau – frances.yau@mbakerintl.com
California Department of Fish and Wildlife, Region 6 – R6LSA@wildlife.ca.gov
Office of Planning and Research, State Clearinghouse, Sacramento –
(state.clearinghouse@opr.ca.gov)