

# **NOTICE OF PREPARATION DRAFT ENVIRONMENTAL IMPACT REPORT**

**CEQA LEAD AGENCY:**

Rebecca Deming  
Community Development Director  
City of Beaumont  
550 East 6<sup>th</sup> Street  
Beaumont CA, 92223

**SUBJECT: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT  
REPORT FOR THE CITY OF BEAUMONT GENERAL PLAN UPDATE (BEAUMONT 2040  
PLAN)**

**AGENCIES:** The City of Beaumont is publishing this Notice of Preparation (NOP) for a Draft Environmental Impact Report (EIR) for the City of Beaumont General Plan Update (Beaumont 2040 Plan, proposed Project) in accordance with the requirements of the California Environmental Quality Act (CEQA). In accordance with CEQA Guidelines Section 15082, the City of Beaumont (City) has determined that an EIR is the appropriate environmental document for the Project.

The NOP is being circulated to obtain the views of you or your agency or organization as to the scope and content of the environmental information that is germane to your agency or organization's statutory responsibilities or interests in connection with the proposed Project. If applicable, an agency may need to use the EIR prepared by the City when considering issuance of a permit or other approval for the Project. Information gathered during the NOP comment period will be used to shape and focus future analysis of environmental impacts.

**ORGANIZATIONS AND INTERESTED PARTIES:** The City of Beaumont requests your comments regarding the proposed scope and content of the environmental information to be included in the EIR.

**PROJECT TITLE: Beaumont General Plan Update (Beaumont 2040 Plan)**

**NOP COMMENT PERIOD:**

Pursuant to CEQA Guidelines Section 15082(b), the City invites you to submit written comments describing your specific environmental concerns, and if representing a public agency, please identify your specific areas of statutory responsibility if applicable. Please send your NOP response or responses to Rebecca Deming at the address shown above. We will need the name, address, and contact information in your correspondence. If you have any questions, please contact Rebecca Deming at (951) 572-3229 or via email at [rdeming@ci.beaumont.ca.us](mailto:rdeming@ci.beaumont.ca.us).

A copy of the NOP is available for public review at the Lead Agency, and an electronic copy of the NOP will be made available on the City's website: [www.Beaumont-Ca.gov](http://www.Beaumont-Ca.gov). Interested individuals and organizations are also invited to submit written comments on the scope of the EIR. Written comments are desired at the earliest possible date, but due to the time limits mandated by State law, your response must be sent no later than 30 days after receipt of this notice. The NOP public comment period begins March 9, 2018 and ends on April 9, 2018.

**SCOPING MEETING:** The City will hold a Public Scoping Meeting on Tuesday, March 13, 2018 at 6:00 PM at the Beaumont Civic Center at 550 East 6<sup>th</sup> Street Beaumont, CA 92223. The Public Scoping Meeting will include a brief presentation introducing the Project and the CEQA process. The General Plan Update land use plan that will be presented at the Scoping Meeting is available on the City's website: [www.Beaumont-Ca.gov](http://www.Beaumont-Ca.gov). The balance of the meeting will be for the purpose of receiving comments from the public and agencies concerning topics to be analyzed in the EIR.

## **PROJECT LOCATION AND SETTING**

The City and City's sphere of influence (SOI) (collectively referred to as the "Planning Area") is located in the northwestern portion of Riverside County (County), and is bounded by the City of Calimesa to the northwest, unincorporated areas of the County to the west, unincorporated County areas (e.g., Cherry Valley) to the north, unincorporated County areas and the City of San Jacinto to the south, and by the City of Banning to the east. The Planning Area encompasses approximately 41.51 square miles (26,566 acres). Major transportation routes through the Planning Area include Interstate 10 (I-10), State Route 60 (SR-60), and State Route 79 (SR-79) (Figure 1, Regional Map).

The Planning Area includes land within the existing City of Beaumont limits (approximately 19,381 acres) and within the City's SOI which includes unincorporated areas outside the current City limits (approximately 7,185 acres) (Figure 2, Project Vicinity). In preparing the Beaumont 2040 Plan and planning for the future of the City, it will be important to closely coordinate with neighboring jurisdictions and regional agencies in order to plan for sustainable community growth. Land uses within the City's Planning Area may include a combination of undeveloped, developing and developed properties. At this time, the City is not seeking annexation of land within the SOI into its current jurisdiction. However, new development within the SOI is being contemplated as a part of the Beaumont 2040 Plan.

## **PROJECT DESCRIPTION**

The Beaumont 2040 Plan (the proposed Project) is a comprehensive update of the City's General Plan, and provides a vision for the future of Beaumont over the next 20 to 30 years.

The General Plan functions as a guide to the type of community that Beaumont citizens desire, and provides the means by which that desired future can be achieved. The General Plan addresses a range of immediate, mid-, and long-term issues with which the community is concerned. The General Plan is intended to allow land use and policy determinations to be made within a comprehensive framework that incorporates public health, safety, and "quality of life" considerations in a manner that recognizes resource limitations and the fragility of the community's natural environment. Under State law, the General Plan must serve as the foundation upon which all land use decisions are to be based, and must also be comprehensive, internally consistent, and have a long-term perspective. State law further mandates that the General Plan:

- Identify land use, circulation, environmental, economic, and social goals and policies for the City and its surrounding planning area as they relate to future growth and development;
- Provide a basis for local government decision-making, including decisions on development approvals and exactions;

- Provide citizens the opportunity to participate in the planning and decision-making process of their communities; and
- Inform citizens, developers, decision-makers, and other cities and counties of the ground rules that guide development within a particular community.

According to State law, General Plans are required to cover nine topics: land use, circulation, housing, conservation, open space, noise, air quality, safety and environmental justice. Jurisdictions may include any other topic that is relevant to planning its future. The City has an adopted Housing Element (2013-2021) that is not a part of this Update process. The updated City of Beaumont General Plan will include the rest of the required topics plus economic development, community/urban design, infrastructure and community facilities, resource management, sustainability, and governance.

Beaumont is a community that values its small-town feel, community heritage, and natural setting. The City is committed to encouraging economically sustainable, balanced growth that respects its long history, while meeting infrastructure needs and protecting the environment. Beaumont's community pride and rural mountain setting sets the city apart as a vibrant and healthy community with local access to retail, services, jobs, and recreation. Beaumont 2040's vision for the future focuses on the following guiding values and priorities:

- **Transparent, honest government:** The citizens of Beaumont desire and value a customer-oriented government that adapts to digital technology, improves effectiveness, embraces innovation, and encourages everyone to participate in City government. Local leaders and public employees are accountable to the citizens.
- **Responsible, measured growth:** Beaumont values a good balance of homes, jobs, and retail with access to local urban amenities. Beaumont promotes expanded and enhanced opportunities for employment in the City, while ensuring that population growth does not outpace existing infrastructure capacity.
- **Fiscal responsibility:** Beaumont encourages fiscal transparency, responsible growth and effective management of fiscal revenues. Beaumont promotes policies that create a strong environment for job creation, build a strong tax base, and improve the fiscal performance of City.
- **Small-town atmosphere:** Beaumont values its small-town atmosphere with distinct neighborhoods, historic downtown and connection to the natural environment. Beaumont is an inviting place to live and visit, and a desirable place for families. The citizens have a sense of pride and belonging in their City and close ties with their neighbors. Downtown Beaumont is a vibrant, diverse, active and walkable place in the heart of the City with civic, commercial, entertainment and residential opportunities for all residents in with high-quality streetscape design, community gathering spaces, and buildings that support pedestrian comfort and safety.
- **Quality of life provided by efficient infrastructure:** Beaumont has vibrant neighborhoods that provide retail, entertainment and recreational opportunities within close proximity. Beaumont encourages policies that create a multi-modal transportation network that enhances neighborhood connectivity and provides opportunities for active transportation and complete streets. New pedestrian and bicycle connections and programs will make it easier, more comfortable, and safer for residents, workers, and visitors to meet their daily needs and access regional destinations, and adjacent communities. Beaumont supports the improvement of infrastructure systems that keep pace with development.

- **Health and safety:** Beaumont endorses access to a healthy lifestyle for people of all ages by developing a complete city with a wide range of open space and recreation opportunities and walkable environments that are clean, safe, and kid friendly. Beaumont fosters safe neighborhoods through good community and environmental design policies that promote a mix of uses and active streets.
- **Beautiful environment of the Pass Area:** The citizens of Beaumont value the natural environment of the City and its surroundings. Beaumont promotes policies that encourage access to these resources for all citizens, enhances opportunities for tourism, and stewards these natural resources and habitat areas. A diverse and extensive open space network with parks and trails within the City and to the surrounding Pass Area enhances access for residents and visitors alike.

The Beaumont 2040 Plan identifies major strategies and physical improvements for the City over the next 20 to 30 years. These strategies include revitalizing Sixth Street into a “downtown” for the City, transforming Beaumont Avenue and Sixth Street into mixed use corridors, diversifying housing choices in the City with new affordable and market-rate single family homes and multi-family housing, expanding the jobs base, including development of an employment district and mixed uses along SR-79 in the southern portion of the City. Strategies will also support neighborhood enhancement, connectivity, and sustainable development practices on lands located immediately to the southwest of the City. Transit-oriented development is also contemplated in the area around the potential location of a Metrolink transit station at Pennsylvania Avenue and First Street. To achieve this direction, the City will also need to ensure balanced growth and preservation of the community’s history and identity, open space, and development of a multimodal transportation system.

The following actions will also be taken by the City of Beaumont in connection with the General Plan Update and are also considered part of the Project to be analyzed in the forthcoming EIR:

- Adoption and implementation of the General Plan Update (Beaumont 2040 Plan);
- Adoption and implementation of the revised Zoning Code and Zoning Map;
- Adoption and implementation of the Downtown Specific Plan; and
- Adoption and implementation of the Hillside Development Ordinance.

### **Probable Environmental Effects and EIR Focus**

The forthcoming EIR will evaluate potential impacts of the proposed Project on aspects of the physical environment addressed under CEQA. The analysis in the EIR will include the following specific categories of environmental impacts and concerns related to the proposed Project. This information is provided in order to solicit specific feedback or information which your entity requests to be included in the EIR analysis:

**Aesthetics:** The EIR will address the potential effects on scenic vistas, scenic corridors, visual character, and light and glare.

**Agricultural Resources & Forestry Resources:** The EIR will address the potential effects on farmland, forest land, and timberland and the loss of land zoned for agricultural use.

**Air Quality:** An Air Quality Analysis is being prepared for use in the EIR that will describe existing air quality conditions and will evaluate the potential air quality impacts of the General Plan Update consistent with South Coast Air Quality Management District methodology. The EIR will discuss the measures included in the General Plan Update to minimize impacts of criteria air pollutant emissions.



**Biological Resources:** A Biological Resources Report is being prepared for use in the EIR that will describe the existing biological conditions within the Planning Area, identify the potential impacts of the General Plan Update on vegetation and wildlife, including special status species, and evaluate the likelihood of any significant impacts, including consistency with the Western Riverside County Multiple Species Habitat Conservation Plan.

**Cultural and Paleontological Resources:** A Cultural Resources Report is being prepared for use in the EIR that will address potential impacts to historic structures, archaeological resources, and paleontological resources.

**Geology and Soils:** The EIR will assess soil and geologic conditions in the Planning Area and address seismic hazards, including the potential for liquefaction, ground-shaking, and soil erosion.

**Greenhouse Gas Emissions:** A Greenhouse Gas Emissions (GHG) Analysis is being prepared for use in the EIR that will examine the potential impacts of implementing the General Plan Update relative to GHG emissions and global climate change. The EIR will discuss the measures included in the General Plan Update to minimize impacts of GHG emissions.

**Hazards and Hazardous Materials:** The EIR will include a description of the potential hazards in the Planning Area and the health and safety effects based on implementation of the General Plan Update.

**Hydrology and Water Quality:** The EIR will discuss the drainage conditions throughout the Planning Area and the potential for flooding. Water quality impacts and conformance with the Santa Ana and Colorado Regional Water Quality Control Board requirements will be addressed.

**Land Use and Planning:** The EIR will identify the land uses in the Planning Area and evaluate potential land use constraints created by existing conditions. The compatibility of the General Plan Update with existing and proposed land uses in the Planning Area and consistency with the City policies and plans will be evaluated.

**Mineral Resources:** The EIR will discuss impacts to mineral resources from implementation of the General Plan Update.

**Noise:** The EIR will discuss noise impacts from implementation of the General Plan Update, including impacts from area noise sources (e.g., railroads, airports, I-10, SR-60, and SR-79 freeways, etc.). A noise analysis will identify existing settings and noise level scenarios associated with implementation of the General Plan Update. The EIR will address potential noise impacts associated with implementation of the General Plan Update on residential land uses and other sensitive receptor land uses. Conformance to the City's noise guidelines will be analyzed.

**Population and Housing:** The EIR will evaluate the potential for the proposed land uses of the General Plan Update to result in population or housing growth, and will also discuss the potential displacement of housing and people as development occurs.

**Public Services:** The EIR will identify existing police, fire, schools, parks, and other public services and facilities serving the City, and will quantify the increase in service demands resulting from implementation of the General Plan Update. The availability and adequacy of existing services will be generally analyzed.

**Recreation:** The EIR will discuss the potential to result in the increase in the use of existing recreational facilities that may result in an accelerated physical deterioration of such facilities.

**Transportation and Traffic:** The traffic analysis prepared for the General Plan Update and EIR will describe the existing roadway conditions, circulation patterns, and other elements of the transportation system in the Planning Area, including the local streets and intersections and

regional facilities (I-10, SR-60, SR-79 freeways). A transportation modeling analysis is being prepared in order to evaluate full build-out of the General Plan Update on the overall transportation network. The General Plan Update's compliance with adopted policies, plans, and programs supporting alternative modes of transportation will also be discussed.

**Tribal Cultural Resources:** The EIR will discuss the consultation efforts by the Lead Agency and any Native American Tribes as part of the Assembly Bill 52 (AB 52) and Senate Bill 18 (SB 18) process and include discussions of potential impacts to tribal cultural resources.

**Utilities and Service Systems:** The EIR will discuss the ability of existing infrastructure in the City, such as sanitary sewer, storm drains, water supply, and solid waste, to serve full buildout of the General Plan Update. The EIR will also discuss the availability of the existing water supply to provide for full buildout of the General Plan Buildout.

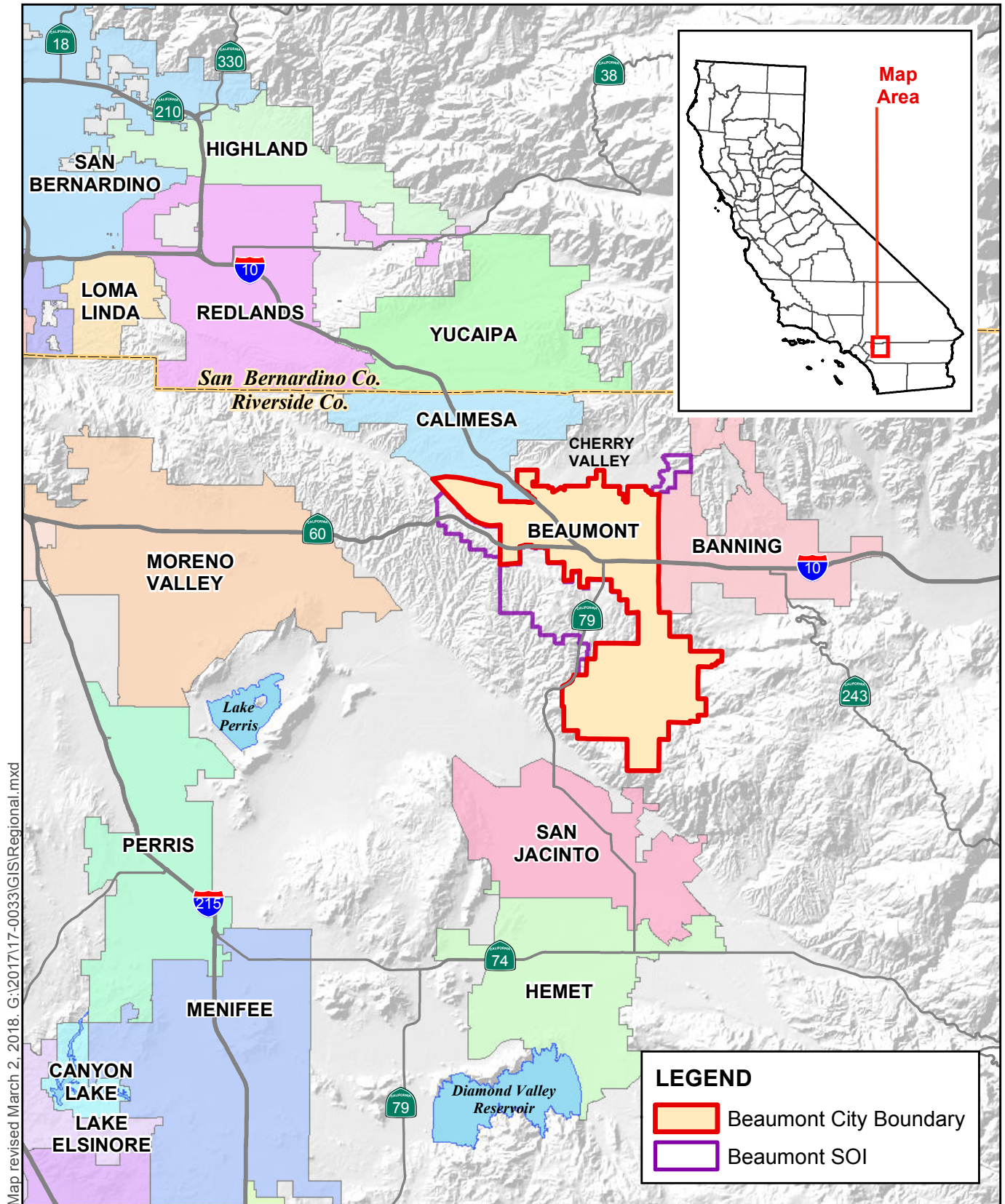
**Project Alternatives:** Identification of potential alternatives to the General Plan Update will be addressed including the "No Project" alternative.

The EIR will identify the degree to which each alternative might reduce one or more of the impacts associated with implementation of the General Plan Update, whether or not the alternative could result in other or increased impacts, the viability of the alternative, and the degree to which the alternative is consistent with the City's goals and objectives.

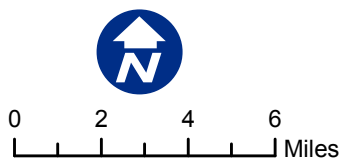
**Cumulative Impact Analysis:** The EIR will include a discussion of the potentially significant cumulative impacts of the General Plan Update when considered with other past, present, and reasonably foreseeable future projects in the area.

**Other Required Sections:** The EIR will also include other information typically required for an EIR. These other sections include the following: 1) Introduction; 2) Project Description; 3) Effects Found Not to be Significant; 4) Environmental Impact Analysis; 5) Growth-Inducing Impacts; 6) Significant Unavoidable Environmental Effects; 7) Significant Irreversible Changes; 8) Consistency with Regional Plans; 9) Discussion and Analysis of Energy Conservation based on Appendix F of the CEQA Guidelines; 10) Mitigation Measures; 11) References; and 12) List of Preparers.

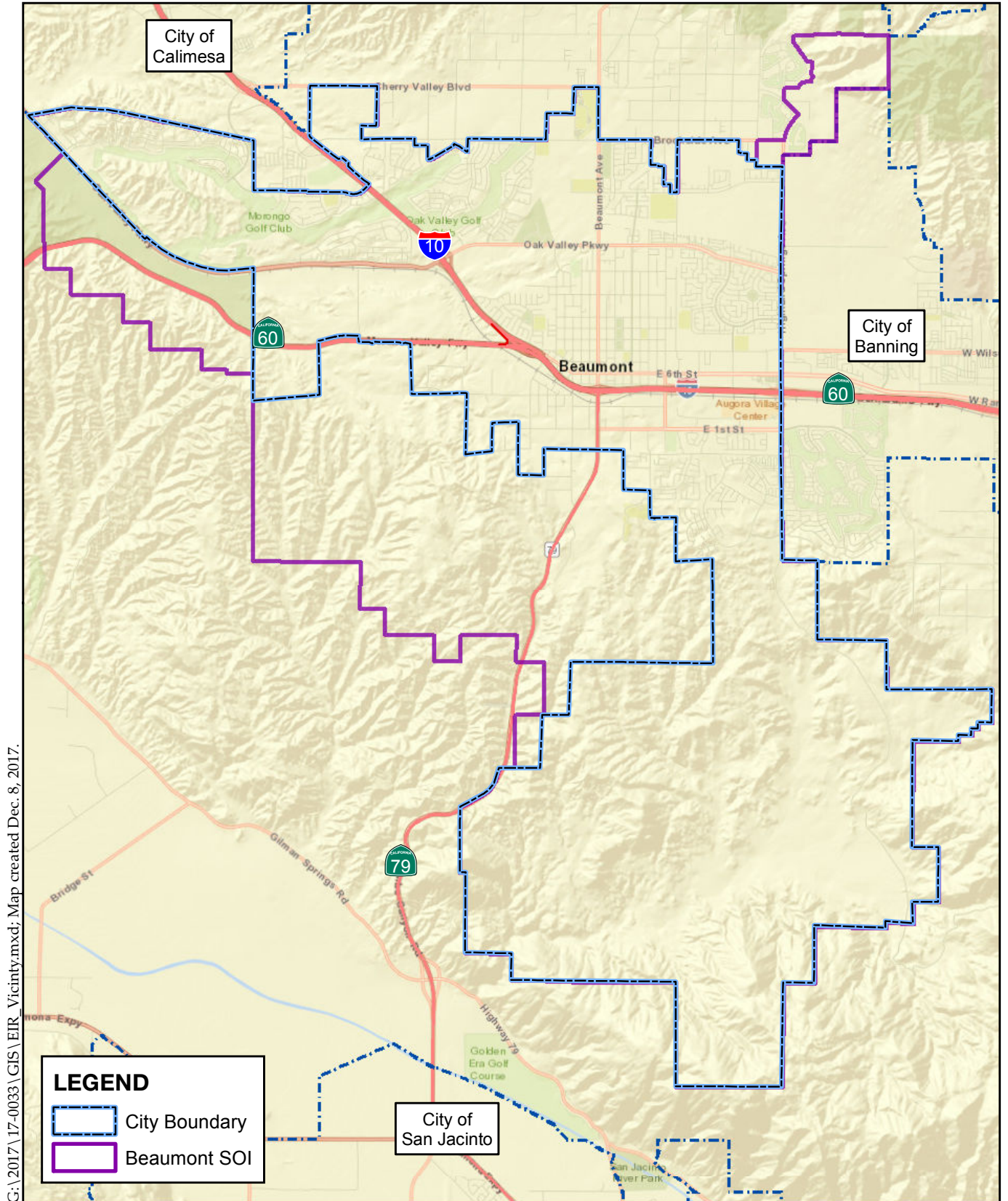
Relevant technical reports will be provided as EIR appendices. The environmental analysis for the proposed Project will be completed through the preparation of technical studies and through support of existing reports and studies on the environmental conditions of the Project area.



**Figure 1 - Regional Map**  
Beaumont General Plan Update



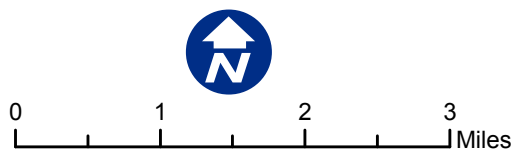




G:\2017\17-0033\GIS\EIR\_Vicinity.mxd; Map created Dec. 8, 2017.

Sources: City of Beaumont, 2018;  
Riverside Co. GIS, 2018.

**Figure 2 - Vicinity Map**  
Beaumont General Plan Update



## NOP Comment Letters



## NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department  
1550 Harbor Blvd., Suite 100  
West Sacramento, CA 95691  
Phone (916) 373-3710



March 14, 2018

Rebecca Deming  
City of Beaumont  
550 East Sixth Street  
Beaumont, CA 92223

Sent via e-mail: [rdeming@ci.beaumont.ca.us](mailto:rdeming@ci.beaumont.ca.us)

RE: SCH# 2018031022; Beaumont General Plan Update (Beaumont 2040 Plan) Project, City of Beaumont;  
Riverside County, California

Dear Ms. Deming:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for Draft Environmental Impact Report for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd. (a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources with the area of project effect (APE).

**CEQA was amended significantly in 2014.** Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (Pub. Resources Code § 21084.2). Please reference California Natural Resources Agency (2016) "Final Text for tribal cultural resources update to Appendix G: Environmental Checklist Form," <http://resources.ca.gov/ceqa/docs/ab52/Clean-final-AB-52-App-G-text-Submitted.pdf>. Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends **lead agencies consult with all California Native American tribes** that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

## AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a **lead agency** shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
  - a. A brief description of the project.
  - b. The lead agency contact information.
  - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
  - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A **lead agency** shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
  - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 65352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
  - a. Alternatives to the project.
  - b. Recommended mitigation measures.
  - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
  - a. Type of environmental review necessary.
  - b. Significance of the tribal cultural resources.
  - c. Significance of the project's impacts on tribal cultural resources.
  - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (r) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
  - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
  - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
- The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
  - A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
- Avoidance and preservation of the resources in place, including, but not limited to:
    - Planning and construction to avoid the resources and protect the cultural and natural context.
    - Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
  - Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
    - Protecting the cultural character and integrity of the resource.
    - Protecting the traditional use of the resource.
    - Protecting the confidentiality of the resource.
  - Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
  - Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
  - Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
  - Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
  - The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
  - The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).

*This process should be documented in the Cultural Resources section of your environmental document.*

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: [http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation\\_CalEPAPDF.pdf](http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf)



## SB 18

SB 18 applies to local governments and requires **local governments** to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: [https://www.opr.ca.gov/docs/09\\_14\\_05\\_Updated\\_Guidelines\\_922.pdf](https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf)

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
  - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
  - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

## NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center ([http://ohp.parks.ca.gov/?page\\_id=1068](http://ohp.parks.ca.gov/?page_id=1068)) for an archaeological records search. The records search will determine:
  - a. If part or all of the APE has been previously surveyed for cultural resources.
  - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
  - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
  - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.

- b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
- 3. Contact the NAHC for:
  - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
  - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
- 4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
  - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
  - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
  - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at [gayle.totton@nahc.ca.gov](mailto:gayle.totton@nahc.ca.gov).

Sincerely,

*Gayle Totton*

Gayle Totton, M.A., PhD.  
Associate Governmental Program Analyst  
(916) 373-3714

cc: State Clearinghouse

**From:** Fossum, Larry (TRBL) [<mailto:lfossum@aguacaliente.net>]

**Sent:** Thursday, March 15, 2018 10:35 AM

**To:** Rebecca Deming

**Subject:** City of Beaumont Notice of Preparation of a Draft EIR, Beaumont 2040 Plan

Dear Rebecca:

A records check of the Agua Caliente Band of Cahuilla Indians Tribal Historic Preservation Office's cultural registry revealed that this project is not located within the Tribe's Traditional Use Area. Therefore, we defer to other tribes in the area. This letter shall conclude our consultation efforts.

Cordially,

Larry Fossum

On behalf of

Patricia Garcia-Plotkin

Director of Historic Preservation

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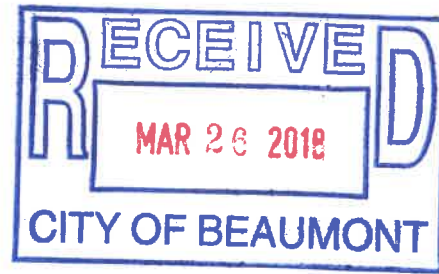
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**DEPARTMENT OF TRANSPORTATION****DISTRICT 8**

PLANNING (MS 722)  
464 WEST 4<sup>th</sup> STREET, 6<sup>th</sup> Floor  
SAN BERNARDINO, CA 92401-1400  
PHONE (909) 383-4557  
FAX (909) 383-5936  
TTY (909) 383-6300  
[www.dot.ca.gov/dist8](http://www.dot.ca.gov/dist8)



*Make Conservation  
A California Way of.*



March 22, 2018

City of Beaumont  
Rebecca Deming  
550 East Sixth Street  
Beaumont, CA 92223

Beaumont General Plan Update (Beaumont 2040 Update) SCH# 2018031022

Ms. Deming,

Thank you for the opportunity to review and comment on the Beaumont General Plan Update (Beaumont 2040 Plan) draft Environmental Impact Report. The General Plan addresses a range of immediate; both mid and long term issues that affect the community. The update is for several elements of the General Plan: Land Use, Conservation/Open Space, Public Health, Safety and Circulation and a number of other issues. We have completed the review of the initial study of the environmental review for the City's General Plan and we request consideration of the following comments.

The Department of Transportation (Department) is a responsible agency on this project and we have the following comments:

- Link streets systems that are designed to balance auto, pedestrian and bicycle movement. Street systems should be linked for continuous travel and designed for all modes of transportation. Consider amending circulation Element to allow for Class IV Separated bike lanes wherever possible on Arterials, Collectors and Couplets.
- Encourage mixed-use development near transit services.
- Connect open space, parks and trails into a connective system.
- Plan for mixed-density, mixed-income housing, senior citizen housing, and student housing.
- Promote choices for transportation modes.
- Consider increasing allowable residential density in Downtown Mixed-Use (DMX) up to 40 du/ac.
- Address the provision of SB 1000 planning for Healthy Communities.
- Consider increasing allowable residential density in Urban Village (UV) up to 40 du/ac.
- Provisions for noise mitigation measures along railroad tracks in residential areas.  
<https://transplanning.onramp.dot.ca.gov/smart-mobility-framework>  
<https://transplanning.onramp.dot.ca.gov/ctp-2040>

Multimodal transportation networks that allow people to walk or bicycle as a viable transportation can promote an active lifestyle as opposed to driving. These active transportation modes increases, physical activity rates. Reducing the amount that people drive by increasing the opportunity for walking, bicycling and transit also reduces vehicle emissions

Please continue to keep us informed of this project and any future developments, which could potentially impact the State Transportation Facilities. If you have any questions or need to contact us, please do not hesitate to call me at (909) 383-4557.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Roberts", with a stylized, flowing script.

MARK ROBERTS, AICP  
Office Chief  
Intergovernmental Review, Community and Regional Planning



*Hans W. Kernkamp, General Manager-Chief Engineer*

March 26, 2018

Ms. Rebecca Deming  
Community Development Director  
City of Beaumont  
550 East 6<sup>th</sup> Street  
Beaumont CA, 92223

**RE: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of Beaumont General Plan Update**

Dear Ms. Deming:

The Riverside County Department of Waste Resources (RCDWR) has reviewed the NOP addressing a DEIR for the City of Beaumont (City) General Plan Update (Project). The RCDWR offers the following comments for your consideration while preparing the Project's DEIR.

1. Build-out of the Project may have the potential to increase the amount of waste that could adversely affect solid waste facilities. To assess waste impacts, the DEIR should include the projected maximum amount of waste generated from build-out of the Project, using appropriate waste generation factors for the proposed General Plan land uses.

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:
  - a) Solid waste generated within the Project area is collected by Waste Management Inc. (WMI), with the bulk of recyclable waste and green waste delivered to the Moreno Valley Solid Waste Recycling and Transfer Facility (MVTs) for processing. The MVTs is located at 17700 Indian Street in Moreno Valley. It is permitted for a 2,500-tpd operation.
  - b) While the Lamb Canyon Landfill is the closest landfill to Project site, the City's waste hauler could also use the Badlands Landfill and the El Sobrante Landfill for disposal of the City's residual waste. Descriptions of the local landfills are provided below:

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 580.5 acres encompass the current landfill permit area. Of the 580.5-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 has an estimated total disposal capacity of approximately 20.7 million tons. As of January 1, 2018 (beginning of day), the landfill has a total remaining capacity of approximately 9.9 million tons. The current landfill remaining disposal capacity is estimated to last, at a minimum, until approximately 2029. From January 2017 to December 2017, the Lamb Canyon Landfill accepted a daily average of 1,878 tons with a period total of approximately 576,439 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 permitted disturbance area of 278 acres, of which 150 acres are permitted for refuse disposal. The landfill is currently permitted to receive 4,500 tpd of MSW for disposal and has an estimated total capacity of approximately 20.5 million tons. As of January 1, 2018 (beginning of day), the landfill had a total remaining disposal capacity of approximately 6.9 million tons. The current landfill remaining disposal capacity estimated to last, at a minimum, until approximately 2022. From January 2017 to December 2017, the Badlands Landfill accepted a daily average of 2,758 tons with a period total of approximately 846,769 tons. Landfill expansion potential exists at the Badlands Landfill site.

#### 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. As of January 1, 2017, the landfill had a remaining in-County disposal capacity of approximately 56.4 million tons. In 2016, the El Sobrante Landfill accepted a total of 852,987 tons of waste generated within Riverside County. The daily average for in-County waste was 2,760 tons during 2016. The landfill is expected to reach capacity in approximately 2060.

3. Note that the closed Beaumont Landfill is located within the City, north of 4<sup>th</sup> St., between Distribution Way and Nicholas Rd. While the landfill is inactive, RCDWR actively monitors the landfill's environmental control systems, as well as performs site inspections. In addition, the Lamb Canyon landfill, a regional disposal facility, is adjacent to the southwestern portion of the City's sphere of influence (SOI). Please consider land-use incompatibility issues and development constraints when preparing the General Plan update.
4. Additionally, you may wish to consider incorporating the following measures to help reduce the Project's anticipated solid waste impacts and enhance the City's efforts to comply with the State's mandate of 50% solid waste diversion from landfilling:

- 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. 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 that generate 8 cubic yards or more of organic waste per week to arrange for organic waste recycling services. The threshold amount of organic waste generated requiring compliance by businesses is reduced in subsequent years. Businesses subject to AB 1826 shall take at least one of the following actions in order to divert organic waste from disposal:
  - 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.



Rebecca Deming  
Community Development Director  
NOP DEIR- City of Beaumont General Plan Update (Beaumont 2040 Plan)  
March 26, 2018  
Page 4

Thank you for allowing us the opportunity to comment on the NOP. We would appreciate a copy of the Draft EIS/EIR on CD for review and comment when available. Please continue to include the RCDWR in future transmittals. Please call me at (951) 486-3200 if you have any questions regarding the above comments.

Sincerely,



Jose Merlan  
Urban/Regional Planner III

PD# 222216

SENT VIA USPS AND E-MAIL:

April 4, 2018

[rdeming@ci.beaumont.ca.us](mailto:rdeming@ci.beaumont.ca.us)

Rebecca Deming, Community Development Director  
City of Beaumont  
550 East 6<sup>th</sup> Street  
Beaumont, CA 92223

**Notice of Preparation of a Draft Environmental Impact Report for the  
City of Beaumont General Plan Update (Beaumont 2040 Plan)**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send the SCAQMD a copy of the Draft EIR upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include emission calculation spreadsheets and modeling input and output files (not PDF files)<sup>1</sup>. Without all files and supporting documentation, SCAQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

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

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board of Directors on March

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<sup>1</sup> Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

23<sup>rd</sup>. The 2016 AQMP<sup>2</sup> is a regional blueprint for achieving air quality standards and healthful air in the South Coast Air Basin. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides 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. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: <http://www.aqmd.gov/home/library/documents-support-material/planning-guidance/guidance-document>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance<sup>3</sup> on strategies to reduce air pollution exposure near high-volume roadways can be found at: [https://www.arb.ca.gov/ch/rd/technical\\_advisory\\_final.PDF](https://www.arb.ca.gov/ch/rd/technical_advisory_final.PDF).

The SCAQMD has also developed both regional and localized significance thresholds. SCAQMD staff requests that the Lead Agency compare the emission results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

When specific development is reasonably foreseeable as result of the goals, policies, guidelines, and features in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the Draft EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the Draft EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, emissions from the overlap

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<sup>2</sup> South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Available at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

<sup>3</sup> In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

construction and operational activities should be combined and compared those emissions to SCAQMD's regional air quality operational thresholds to determine the level of significance.

In addition to analyzing regional air quality impacts, SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by SCAQMD staff or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

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

### **Mitigation Measures**

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

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- SCAQMD's Rule 403 – Fugitive Dust, the Implementation Handbook for controlling construction-related emissions, and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- SCAG's MMRP for the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy available here: [http://scagtrtpscs.net/Documents/2016/peir/final/2016fPEIR\\_ExhibitB\\_MMRP.pdf](http://scagtrtpscs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf)
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

### **Alternatives**

In the event that the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the Draft EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

**Permits**

In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. For more information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to the SCAQMD's Engineering and Permitting staff at (909) 396-3385.

**Data Sources**

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

SCAQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and any significant impacts are mitigated where feasible. If you have any questions regarding this letter, please contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov) or call me at (909) 396-3308.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

RVC180309-05

Control Number





*Patricia Romo, P.E.*  
*Director of Transportation*

# COUNTY OF RIVERSIDE

## TRANSPORTATION AND LAND MANAGEMENT AGENCY

### Transportation Department

*Mojahed Salama, P.E.*  
*Deputy for Transportation/Capital Projects*  
*Richard Lantis, P.L.S.*  
*Deputy for Transportation/Planning and  
Development*

April 5, 2018

Rebecca Deming  
Community Development Director  
City of Beaumont  
550 East 6<sup>th</sup> Street  
Beaumont, CA, 92223

**RE: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT  
FOR THE CITY OF BEAUMONT GENERAL PLAN UPDATE (BEAUMONT 2040)**

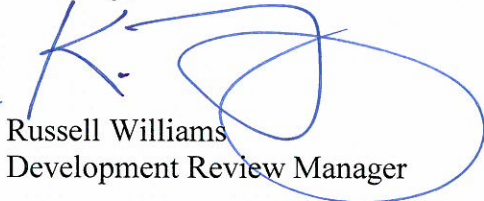
Dear Ms. Deming:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the City of Beaumont General Plan update (Beaumont 2040).

The Riverside County Transportation Department (County) requests the City to coordinate changes to its Circulation Element with County Transportation and Planning Departments to address inter-jurisdictional roadway connections and classification transitions. If found, the County requests to meet with the City to coordinate and resolve any inconsistencies between the County's and City's proposed Circulation Element prior to the approval of the Beaumont General Plan Update.

Thank you again for the opportunity to review the NOP. We look forward to receiving the Draft EIR for the project. Please contact me at (951) 955-2016 with questions or comments.

Sincerely,

*for*   
Russell Williams  
Development Review Manager

RUW:KKT/TT

cc: Juan C. Perez, Director of Transportation and Land Management

Patricia Romo, Director of Transportation  
Richard Lantis, Deputy Director of Transportation



**MORONGO BAND OF MISSION INDIANS**  
**TRIBAL HISTORIC PRESERVATION OFFICE**  
12700 PUMARRA RD BANNING, CA 92220  
OFFICE 951-755-5025 FAX 951-572-6004

**April 6, 2018**

**TO: Rebecca Deming**  
**Community Development Director**  
**City of Beaumont**

**FROM: Ray Huaute**  
**Tribal Historic Preservation Officer**  
**Morongo Band of Mission Indians**

**RE: Notice of Preparation Draft Environmental Impact Report, City of Beaumont General Plan Update (Beaumont 2040 Plan)**

Dear Ms. Deming,

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) for the City of Beaumont General Plan Update. The following addresses the scope of the EIR and specific environmental concerns as requested in the NOP. As the NOP notes, it is important for the City to coordinate with neighboring jurisdictions to plan for sustainable community growth.

**Scope of the EIR**

The NOP states that the City is preparing a Cultural Resources Report for use in the EIR to address potential impacts on archaeological and other historic resources. The proposed scope and methods of the report should be made available to Morongo in advance to comment on to better help avoid or minimize specific and cumulative impacts to tribal cultural resources. The report, for example, should include sensitivity zones of cultural resources developed in coordination with interested tribal governments. The report also should include data on the loss of cultural resources within the Planning Area from initial adoption of the current General Plan to the present time.

The NOP also states that the EIR will discuss the city's consultation efforts with tribal governments under Assembly Bill 52 (AB 52) and Senate Bill (SB 18) and include discussion of possible impacts to tribal cultural resources. The City should make clear that potential zoning changes resulting in the granting of conditional use permits or other land-use decisions stemming from the General Plan Update still must be addressed separately under the AB 52 government-to-government consultation process. SB 18 for plan updates and amendments and AB 52 for specific projects have different requirements.

**Specific Environmental Concerns**

The NOP notes that the City is not seeking to annex land within the Sphere of Influence (SOI) into its boundaries at this time. The SOI is part of the Planning Area of the General Plan update, and new development within areas of the SOI is being contemplated according to the NOP. Specifically, these include areas with recorded and unrecorded tribal cultural resources. For example, zoning changes to allow larger-scale developments could have impacts on sensitive areas along Highways 60 and 79. The Cultural Resources Report and eventual EIR must identify these impacts in these areas, as well as the rest of the Planning Area, to provide a basis for local government decision-making and address ways



to avoid or limit potential harm to tribal cultural resources. These documents also should address visual and other impacts on cultural resources outside of rezoned areas if new development has potential to harm the significance and integrity of these resources outside the rezoned areas.

Respectfully,

Raymond Huaute  
Cultural Resource Specialist  
Morongo Band of Mission Indians  
Email: [rhuaute@morongo-nsn.gov](mailto:rhuaute@morongo-nsn.gov)  
Phone: (951) 755-5025

April 9, 2018

To: Rebecca Deming  
Community Development Director  
City of Beaumont 550 East 6<sup>th</sup> Street Beaumont CA, 92223

From: Ron Roy  
35161 Hogan Dr.  
Beaumont, Ca. 92223

Re: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT  
REPORT FOR THE CITY OF BEAUMONT GENERAL PLAN UPDATE  
(BEAUMONT 2040 PLAN)

Dear Ms. Deming:

Please note my comments below are based, in part, on the cities:

March 6, 2018:

**CITY OF BEAUMONT GENERAL PLAN UPDATE**  
**Land Use Designations Map**

I oppose the above stated General Plan (GPU) for the following reasons:

**BUILDING HEIGHTS:**

To protect existing open spaces and rural designations requires  
concentrating development to historic and existing centers such as

Beaumont Ave North of I10, 6<sup>th</sup> Street (W&E), Historic Railroad District, and 2<sup>nd</sup> Street Marketplace area (including nearby centers such as Albertsons neighborhood shopping

### **Ron Roy: Beaumont GPU 2050 Plan Comment Letter**

center[former Kmart], Walmart, Home Depot, Kohl's), and existing developments in the area bounded by I10 North, Highland Springs<sup>2</sup> Rd. East, First Street South, and Beaumont Ave. West. One way to do this is to allow for multi-story building heights.

Beaumont should draw from the experiences of other cities. For Palm Springs, Newport Beach, and other Southern California Cities allows up to 6 stories (sometimes more) while still protecting their views. Planning is done in consideration of the surrounding Mountain or

Coastal Views. Beaumont has similar view considerations with the Pass Area mountain vistas and views of the Palomar Mountains in San Diego Counties and Santiago Peak in Orange County. If the buildings are set back properly from the main thoroughfares and major streets referenced above, the city should consider allowing for heights of at-least 6 stories as long as the designs protect views and are vetted by the community.

### **UNNECESSARY AREAS:**

Beaumont has numerous existing commercial/retail areas that are woefully underdeveloped. A goal of the General Plan should be to protect existing open spaces and rural designations and to concentrate development to historic and existing centers such as Beaumont Ave North of I10, 6<sup>th</sup> Street (W&E), Historic Railroad District, and 2<sup>nd</sup> Street Marketplace area (including nearby centers such as Albertsons neighborhood shopping center[former Kmart], Walmart, Home Depot, Kohl's), and existing developments in the area bounded by I10 North, Highland Springs Rd. East, First Street South, and Beaumont Ave. West.

One way to do this is to restrict commercial, urban village, industrial, mixed use, land use designations to the above existing and historical areas. The 21<sup>st</sup> century advent of online shopping already tests the viability and convenience of bricks-and-mortar stores and centers. Adding additional commercial/industrial/retail areas unnecessarily disperses these uses and competes with existing areas, which will thwart and stunt build outs for the existing areas.

### **Ron Roy: Beaumont GPU 2050 Plan Comment Letter**

Therefore the general plan should eliminate the following:

- Urban Village overlay: bounded by Oak Valley Parkway to the north, Potrero Blvd. to the west, SR60 to the South, and SR60/I10 interchange to the east.
- Urban Village overlay: bounded by Hwy79/Beaumont Ave to the West, future Potrero Blvd to the North. Seneca Springs housing to the
- East, and raw land near Beaumont's southern sphere of influence to the south.
- The sole roughly triangular shaped, "Employment District" in South Beaumont (south of I10) west of Hwy 79/Beaumont Ave. south of Westward Ave (approx)The indicated employment uses (for market-supported light industrial, research and development, creative office and maker space type uses, retail, service and other supportive uses) should be located in other Non-Residential Designations already in existence in the city.

### **CONCENTRATE DEVELOPMENT IN EXISTING NON RESIDENTIAL AND MIXED USE DESIGNATIONS**

Proposed NC, GC, ED, DMX, UV, should be located in existing areas (primarily dark blue, red, and pink (DMX) areas designated in the March 6<sup>th</sup> 2018 GP map).

This creates a number of advantages. Many of the businesses located in areas such as industrially zoned, not only produce, assemble or wholesale products, but also are open to the public.

I fear these businesses will go-under because there's not enough foot traffic near their businesses (think of the small businesses around Historic Railroad District, or in the area roughly south of and abutting I10 between Hwy79(Beaumont Ave) and Pennsylvania Ave and First Street to the south). By locating commercial, office uses in these existing "dark blue", "dark red", "pink" areas will bring workers and consumers into these areas and, thereby more traffic and more sales. These smaller businesses do not have the regional/national brand that allow them to compete in the online-retail

### **Ron Roy: Beaumont GPU 2050 Plan Comment Letter**

universe. So additional foot traffic, locally generated sales are critical to their survival.

Also need to revise industrial zone designations to require retail outlets for all warehouses (Example: Wolverine: should have at least 5000 sq.ft. of retail space at their warehouse).

This thoughtful concentration of uses creates a smaller carbon footprint, sustainable infrastructure, and is in keeping with governmental climate change, GHG goals and regulations.

### **TOD OVERLAY;**

This overlay shows much promise, and should be considered as a critical new focal point for the community. Emphasis should be placed on design features that draw attention to regional/ national/ international travelers on Metrolink or Amtrak Trains and local and regional transit (RTA, Sunline, Pass Transit, etc). By also locating retail/non residential uses here could also bring more traffic and revenues to the nearby surrounding areas that about and/or are near I10.

However, the city has not gone far enough here. Beaumont needs to create and designate a transit center, transit hub and put it on the GP map. Beaumont should draw from the experiences and designs of recently completed transit centers such as the San Bernardino Transit Center, and the ARTIC transit center in Anaheim.

Here also the GPU needs to designate and include alternative energy refueling stations throughout the city. Perhaps a “alternative energy circulation map” could display a comprehensive look as to how this infrastructure would work throughout the city.

It appears that vacant land next to Pennsylvania Ave. (south of I10, north of First St) may be a good location for this designation. However, in addition to this site, Beaumont should consider a second transit center near the intersection of Oak Valley Parkway/Desert Lawn Dr. to support regional rail/bus commuters.

### **Ron Roy: Beaumont GPU 2050 Plan Comment Letter**

Beaumont also needs to come up with a design that facilitates access to Beaumonts “mixed village” area along 6<sup>th</sup> street.

### **PUBLIC TRANSIT/ACTIVE TRANSIT (BIKES, PEDESTRIAN, EQUESTRIAN)**

The GPU update has failed to include a Circulation Element and corresponding maps, that indicate where public transit, and active transit can safely circulate throughout the city. These modes of transportation should be clearly indicated in a separate map. Grade 1 bike lanes (Per California DOT) should be the minimum standard. Also Beaumont needs to consider a separated “bikeway” system (that would function similar to car arterial roads), in which a separated paved road network throughout the city dedicated exclusively to bikes is developed. Beaumont should request SB1 funds for this purpose.

The GPU should add more public transit stops/facilities, bike lanes and “bikeway system” , trails in Master Planned Communities such as Oak

Valley Specific Plan that are currently underserved “transit deserts”. More public transit connections from MPCs to regional transit stops should be added (Ex: Beaumont Walmart).

#### GHG, CLIMATE CHANGE, AQMD REQUIREMENTS

The city of Beaumont has not indicated in sufficient detail how its proposed GPU will mitigate or ameliorate for GHG, Climate Change, or AQMD requirements.

#### ENDANGERED SPECIES:

An incredibly rare active Least Bells Vireo Nest (the only one within approximately 100 square miles) has been confirmed in the Beaumont Sphere of Influence south of SR60. Beaumont’s GPU should designate and allow sufficient open space to protect this site from encroachment by development or other potentially catastrophic impacts. The GPU also needs to designate and protect the Stephens Kangaroo Rat, the Potrero Preserve and other protections under Riverside County’s MHSCP.

#### **Ron Roy: Beaumont GPU 2050 Plan Comment Letter**

#### WATERSHED/CREEKS

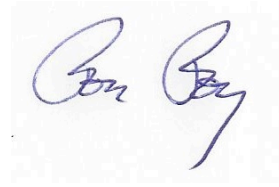
The GPU needs to include a map and designations that protect Beaumont Area watersheds and creeks.

#### BEAUMONT'S MASTER PLAN OF TRAILS

The city’s Master Plan Of Trails should be included in the GPU as a separate map with appropriate designations.

Thank you for considering my objections and recommendations.

Sincerely

A handwritten signature in blue ink, appearing to read "Ron Roy", is written over a light gray rectangular background.

Ron Roy

Beaumont Resident.





State of California - Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, CA 91764  
(909) 484-0459  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

*EDMUND G. BROWN, Jr., Governor*  
*CHARLTON H. BONHAM, Director*



April 9, 2018  
*Sent via email*

Rebecca Deming  
Community Development Director  
City of Beaumont  
550 East 6<sup>th</sup> Street  
Beaumont, CA 92223  
[rdeming@ci.beaumont.ca.us](mailto:rdeming@ci.beaumont.ca.us)

Subject: Notice of Preparation of a Draft Environmental Impact Report  
City of Beaumont General Plan Update (Beaumont 2040 Plan)  
State Clearinghouse No. 2018031022

Dear Ms. Deming:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the City of Beaumont General Plan Update (project) [State Clearinghouse No.2018031022]. The Department is responding to the NOP as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The project encompasses a comprehensive update to the City of Beaumont's (City) General Plan that provides a vision for the future of the City over the next 20 to 30 years. The General Plan identifies the land use, circulation, environmental, economic, and social goals and policies for the City and its surrounding planning area as they relate to future growth and development.

## **COMMENTS AND RECOMMENDATIONS**

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural

*Conserving California's Wildlife Since 1870*

Community Conservation Planning Program (NCCP Program). The Department offers the comments and recommendations presented below to assist the City (the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the Department to adequately review and comment on the proposed project with respect to impacts on biological resources.

The Department recommends that the forthcoming DEIR address the following:

### **Assessment of Biological Resources**

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable Department staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats.

The Department recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. The Department recommends that floristic, alliance- and/or association based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. The Department's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed project. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at:  
<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>

Please note that the Department's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. The Department recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the project site.



3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the project footprint and within offsite areas with the potential to be effected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service, where necessary. Note that the Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if the project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.
4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://www.wildlife.ca.gov/Conservation/Plants>);
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).
6. A full accounting of all mitigation/conservation lands within and adjacent to the project.

### **Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources**

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the project. To ensure that project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity, defensible space, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address project-related changes on drainage patterns and water quality within, upstream, and downstream of the project site, including: volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

With respect to defensible space: please ensure that the DEIR fully describes and identifies the location, acreage, and composition of defensible space *within* all proposed development priority areas. Please ensure that any graphics and descriptions of defensible space associated with this project comply with Riverside County Fire/City of Beaumont Fire (or other applicable agency) regulations/requirements. The City, through their planning processes, should be ensuring that defensible space is provided and accounted for *within proposed development areas*, and not transferred to adjacent open space or conservation lands, such as the Potrero Unit of the San Jacinto Wildlife Area. Please note that lands proposed to be managed for defensible space purposes will have lower conservation resource value as they require in-perpetuity vegetation management.

2. A discussion of potential indirect project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g. National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or conservation/mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).
3. An evaluation of impacts to adjacent open space lands from both the construction of the project, long-term operational and maintenance needs, and long-term impacts from recreational activities.
4. A cumulative effects analysis developed as described under CEQA Guidelines § 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

### **Alternatives Analysis**

Note that the DEIR must describe and analyze a range of reasonable alternatives to the project that are potentially feasible, would “feasibly attain most of the basic objectives of the project,” and would avoid or substantially lessen any of the project’s significant effects (CEQA Guidelines § 15126.6[a]).

### **Mitigation Measures for Project Impacts to Biological Resources**

The DEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the

project. When proposing measures to avoid, minimize, or mitigate impacts, the Department recommends consideration of the following:

1. *Fully Protected Species*: Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the project area. The Department also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. The Department recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization, and mitigation measures will reduce indirect impacts to fully protected species.
2. *Sensitive Plant Communities*: The Department considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.
3. *Mitigation*: The Department considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

If sensitive species and/or their habitat may be impacted from the project, the Department recommends that the City include specific mitigation in the DEIR. CEQA Guidelines §15126.4, subdivision (a)(1)(8) states that formulation of feasible mitigation measures should not be deferred until some future date. The Court of Appeal in *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645 struck down mitigation measures which required formulating



management plans developed in consultation with State and Federal wildlife agencies after Project approval. Courts have also repeatedly not supported conclusions that impacts are mitigable when essential studies, and therefore impact assessments, are incomplete (*Sundstrom v. County of Mendocino* (1988) 202 Cal. App. 3d. 296; *Gentry v. City of Murrieta* (1995) 36 Cal. App. 4th 1359; *Endangered Habitat League, Inc. v. County of Orange* (2005) 131 Cal. App. 4th 777).

The Department recommends that the DEIR specify mitigation that is roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (CEQA Guidelines, §§ 15126.4(a)(4)(B), 15064, 15065, and 16355). The mitigation should provide long-term conservation value for the suite of species and habitat being impacted by the project. Furthermore, in order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions.

4. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

5. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the project proponent's responsibility to comply with all applicable laws related to nesting birds

and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) also afford protective measures as follows: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

The Department recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the Department recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

6. *Moving out of Harm's Way:* The proposed project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, the Department recommends that the lead agency condition the DEIR to require that a Department-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., the Department does not recommend relocation to other areas). Furthermore, it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
7. *Translocation of Species:* The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful.



### **California Endangered Species Act**

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the California Endangered Species Act (CESA). The Department recommends that a CESA Incidental Take Permit (ITP) be obtained if the project has the potential to result in "take" (California Fish and Game Code Section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill") of State-listed CESA species, either through construction or over the life of the project. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

The Department encourages early consultation, as significant modification to the proposed project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. Please note that the proposed avoidance, minimization, and mitigation measures must be sufficient for the Department to conclude that the project's impacts are fully mitigated and the measures, when taken in aggregate, must meet the full mitigation standard. Revisions to the California Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA ITP unless the Project CEQA document addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit.

### **Western Riverside County Multiple Species Habitat Conservation Plan**

Within the Inland Deserts Region, the Department issued Natural Community Conservation Plan Approval and Take Authorization for the Western Riverside County MSHCP per Section 2800, *et seq.*, of the California Fish and Game Code on June 22, 2004. The MSHCP establishes a multiple species conservation program to minimize and mitigate habitat loss and provides for the incidental take of covered species in association with activities covered under the permit.

Compliance with approved habitat plans, such as the MSHCP, is discussed in CEQA. Specifically, Section 15125(d) of the CEQA Guidelines requires that the CEQA document discuss any inconsistencies between a proposed Project and applicable general plans and regional plans, including habitat conservation plans and natural community conservation plans. An assessment of the impacts to the MSHCP as a result of this project is necessary to address CEQA requirements. To obtain additional information regarding the MSHCP please go to: <http://rctlma.org/epd/WR-MSHCP>.

The proposed project occurs within the MSHCP area and is subject to the provisions and policies of the MSHCP. In order to be considered a covered activity, Permittees must demonstrate that proposed actions are consistent with the MSHCP and its associated Implementing Agreement. The City of Beaumont is the Lead Agency and is signatory to the Implementing Agreement of the MSHCP. The project is located in The Pass and San Jacinto Valley Area Plans, and includes multiple MSHCP Criteria Cells. If



future proposed projects are located within MSHCP Criteria Cells, these projects will be subject to the Joint Project Review (JPR) process through Western Riverside County Regional Conservation Authority. In addition, projects may be subject to any or all of the following MSHCP policies and procedures: the Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools (MSHCP section 6.1.2), Protection of Narrow Endemic Plant Species (MSHCP section 6.1.3), Additional Survey Needs and Procedures (MSHCP section 6.3.2), and the Guidelines Pertaining to the Urban/Wildlands Interface (MSHCP section 6.1.4).

The DEIR needs to address how the proposed project will affect the policies and procedures of the MSHCP. Therefore, all surveys required by the MSHCP policies and procedures listed above to determine consistency with the MSHCP should be conducted and results included in the DEIR so that the Department can adequately assess whether the project will impact the MSHCP.

### **Lake and Streambed Alteration Program**

Fish and Game Code section 1602 requires an entity to notify the Department prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

Upon receipt of a complete notification, the Department determines if the proposed project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your project that would eliminate or reduce harmful impacts to fish and wildlife resources.

The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

### **Additional Comments and Recommendations**

To ameliorate the water demands of this project, the Department recommends incorporation of water-wise concepts in project landscape design plans. In particular, the Department recommends xeriscaping with locally native California species, and installing water-efficient and targeted irrigation systems (such as drip irrigation). Local water agencies/districts, and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens. Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <http://saveourwater.com/>

### **Further Coordination**

The Department appreciates the opportunity to comment on the NOP of a DEIR for the City of Beaumont General Plan Update project (SCH No. 2018031022). The Department recommends that the City of Beaumont address the comments and concerns outlined in this letter in the forthcoming DEIR. If you have any questions pertaining to the comments provided in this letter, or wish to schedule a meeting and/or site visit, please contact James Sheridan, Environmental Scientist at (760) 200-9419 or at [james.sheridan@wildlife.ca.gov](mailto:james.sheridan@wildlife.ca.gov).

Sincerely,

  
Scott Wilson  
Environmental Program Manager

### Literature Cited

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2<sup>nd</sup> ed. California Native Plant Society Press, Sacramento, California.  
<http://vegetation.cnps.org/>



April 9, 2018

**Via Email**

Rebecca Deming  
Community Development Director  
City of Beaumont  
550 East 6th St.  
Beaumont, CA 92223  
rdeming@ci.beaumont.ca.us

**Re: Beaumont General Plan Update (Beaumont 2040 Plan)**

Dear Ms. Deming:

This law firm represents the Southwest Regional Council of Carpenters (Southwest Carpenters) and submits this letter on the above-referenced project on its behalf.

Southwest Carpenters represents 50,000 union carpenters in six states, including in Southern California, and has a strong interest in the environmental impacts of projects designed to increase development, such as the Beaumont General Plan Update (Project). The City of Beaumont (City) issued a Notice of Preparation signaling the City's intent to prepare a Draft Environmental Impact Report (DEIR) for the Project on March 9, 2018.

The Project will affect land uses permitted within the City (19,381 acres) and its sphere influence (7,185 acres), comprising 41.51 square miles. The Project includes the following actions:

- Adoption and implementation of the General Plan Update (Beaumont 2040 Plan);
- Adoption and implementation of the revised Zoning Code and Zoning Map;
- Adoption and implementation of the Downtown Specific Plan; and
- Adoption and implementation of the Hillside Development Ordinance.

Of particular note, the City's proposed Land Use Designations Map and Hillside Development Ordinance indicate that much of the City's future development will occur on currently undeveloped hillsides.

The comments presented herein should not be interpreted as being exhaustive by any means, but are preliminary concerns based on the Notice of Preparation. Southwest Carpenters look forward to reviewing the DEIR and its full discussion of environmental impacts, alternatives, and mitigation.

### **1. Agricultural Impacts**

According to the California Department of Conservation Farmland Mapping and Monitoring Program, the City is almost entirely surrounded by Farmland of Local Importance. Farmland of Local Importance is defined as including “soils that would be classified as prime [farmland] and [farmland of statewide importance] but lack available irrigation water,” “lands producing major crops for Riverside County but that are not listed as unique crops.” and “lands identified by city or county ordinance as agricultural zones or contracts.”

In the DEIR, please identify exactly which types of Farmland of Local Importance surround the City. Furthermore, the DEIR must describe impacts to this farmland and provide for all possible mitigation. It is noted that a majority of this farmland within the City’s sphere of influence is slated for development by 2040, and it does not initially appear as though the City has proposed avoidance or any other form of mitigation for the loss of this farmland.

### **2. Air Quality**

The City lies within the Southern California Air Basin. This air basin had been found in constant violation of 8-hour ozone (extreme) and PM 2.5 (moderate to serious). The Southern California Air Quality Management District (SCAQMD) has produced an Air Quality Management Plan (AQMP), designed to reduce criteria pollutant emissions to less hazardous, and then attainment, levels.

The General Plan update envisions economic and population growth that would develop almost all land within its sphere of influence by 2040. This development will place much of the proposed future residential uses further away from businesses and public services. This will result in greater commute distances and more vehicle miles traveled by future residents. The DEIR must evaluate the City’s proposed development model for consistency (or inconsistency) with the AQMP. At first glance, the Project will only serve to exacerbate ongoing National Ambient Air Quality Standards for nonattainment criteria pollutants.

### **3. Biological Resources**

The City plans to place over 7,000 acres of new development on currently undeveloped land. New development, consisting almost entirely of residential uses, will primarily occur within the mountainous habitat to the west of the City. This has the potential to limit habitat

connectivity through the construction hundreds to thousands of miles of exclusionary fencing and roads and increase predation of native wildlife by pets.

Mountainous land exists as one of the last vestiges of wildlife habitat and serves as crucial wildlife corridors. The loss and impairment of this habitat will make species dispersal and traversal more difficult, and, at times, impossible. Execution of the Project will have temporary and permanent direct, indirect, and cumulative effects on wildlife. The City should be prepared to fully discuss these wildlife impacts, as well as all proposed mitigation designed to counterbalance these impacts.

The City has noted at least portions of the Project fall within the Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP). In the DEIR, the City should discuss whether its proposed mountainside development is consistent with the MSHCP. In addition, considering the size and scope of the Project, it is quite possible that some portions of the Project fall outside of the MSHCP. If this is the case, the City should disclose which areas of the Project are excluded from the MSHCP. The City should provide a separate analysis of these areas of the Project and provide separate mitigation for impacts to these areas.

#### **4. Greenhouse Gas Impacts**

The City is required to evaluate the potential of the Project to increase greenhouse gas emissions. Although it is possible the City plans to contain some of its growth as infill, City plans to expand and fully develop all land within its sphere of influence to accommodate population growth. Proposed development within the sphere of influence will include industrial, rural residential, rural ranch, urban village, high-density residential, and employment district.

Buildout of the Project will conflict with state, regional, and local greenhouse gas reduction goals. The City appears not to be focused on population densification within its city limits, and instead, seems determined to expand development into currently undeveloped areas. Buildout of the Project will likely greatly increase building-based greenhouse gas emissions, as well as vehicle-miles traveled. Indirectly and cumulatively, the Project is projected to increase demand for goods to be shipped to commercial centers or delivered to residents' homes. These additional trips, alone, would run counter to state and local greenhouse gas reduction goals.

The City developed a Climate Action Plan in 2014, which focused exclusively on regulating the "building energy sector," or energy consumption in buildings. The City set as its goal a roughly 20% reduction in greenhouse gas emissions from 2012 levels (88,310 metric tons of carbon dioxide-equivalent), or reducing these emissions to 63,583 MTCO<sub>2e</sub> by 2020. The 2014 Climate Action Plan only evaluated greenhouse gas emission reductions up to 2020.



As part of the DEIR, the City must describe the City's baseline greenhouse gas emissions. Although the Climate Action Plan only evaluated greenhouse gas emissions from buildings, the City is required to evaluate greenhouse gas emissions from all potential emission sources prior to Project implementation and at full buildout. Furthermore, because the City's Climate Action Plan only extends to 2020, this document will be of little use even for assessing building impacts and mitigation resulting from the implementation of the Project and cannot be relied upon in discussing impacts from any other sources, such as traffic and transportation. In addition, the Project DEIR should also provide an update on the City's progress in attaining the greenhouse gas reduction goals contained in its Climate Action Plan.

The City may wish to consider incorporating a more comprehensive Climate Action Plan in its General Plan as part of the Project. Failure to update the Climate Action Plan would mean the City would have no active Climate Action Plan for Project-related greenhouse gas impacts beyond 2020.

If the City does not adopt an updated Climate Action Plan as part of the Project, the City will be required to exercise extra care when analyzing greenhouse gas-related impacts and carefully disclose how the Project will impact statewide and local goals. The City will need to consider in its analysis:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions

*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal. 4th 204, 217.

## **5. Hazards and Hazardous Materials**

Most of the expansion proposed within the City's sphere of influence will occur within a Very High Fire Hazard Severity Zone (VHFHSZ), as delineated by CAL FIRE. Buildout of the Project in mountainous areas within a VHFHSZ will have a high potential to increase the fire hazard risk within and surrounding the City.

In addition, the Project proposed additional industrial uses within the VHFHSZ. Industrial uses have a high chance of transporting and storing large volumes of hazardous substances and, thus, releasing these substances into the environment. These risks are heightened where, as here, industrial uses are proposed to be located within or near a VHFHSZ.

## **6. Parks and Recreation**

While the southern portion of the City is designated as open space, the City currently has relatively few parks and outdoor recreational activities available. The City may consider adding parklands and recreational trails to open space and undeveloped lands both currently within the city limits, as well as within its greater sphere of influence. Devoting lands currently slated for development as open space and parks and adding recreational trails may also serve to mitigate some of the impacts from the Project.

## **7. Public Services**

The Project sites large areas of residential uses in the mountains, away from the more densely populated and better serviced city center. Regardless of whether Project mitigation will involve the creation of additional fire, police, and medical staff and facilities, these residential uses will be more expensive, difficult, and time-consuming to serve and more susceptible to limitations on accessibility. The DEIR should disclose potential impacts to services in relation to the siting of thousands of acres of residential development on mountainsides.

## **8. Transportation and Traffic**

The City touts its commitment to transit-oriented development, in line with the mandates of SB 375. However, it is doubtful that development occurring within the City's sphere of influence would be well suited for public transit options, as this development will be lower-density residential, likely accessed by multiple, winding roads. In the DEIR, please discuss where the City plans to focus the majority of its growth, and whether this growth will be located near high-volume transit centers.

## **9. Utilities**

Providing utilities, including electricity, water, sewer, and garbage service, to the Project will be highly demanding, especially considering that much of the development will occur in mountainous terrain.

Water supply in western Riverside County is a constant cumulative-impact concern and is often downplayed or overlooked by cities in an effort to greenlight large volumes of



Rebecca Deming, Community Development Director  
Re: Beaumont General Plan Update  
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development, such as the Project. Western Riverside County naturally has scarce water resources, with new development often relying on ever-diminishing and compacting aquifers. The DEIR should provide a full, objective assessment of the Project's water supply, including an assessment of the Project's potential impacts on aquifer health and the potential for the Project to impair access to water during severe drought. The Project should provide heavy mitigation to reduce the Project's impacts on scarce water supplies.

It is unclear whether the City proposes provision of sewer service for hillside development. If the City plans to permit septic systems in these areas, the City must evaluate the potential for the Project to cause seepage of septic into surface and groundwater.

### **Conclusion**

Southwest Carpenters thanks the City for providing an opportunity to comment on the Notice of Preparation. Moving forward, please send all future notices relating to this Project to Nicholas Whipps at [nwhipps@wittwerparkin.com](mailto:nwhipps@wittwerparkin.com). Thank you for your consideration of these comments.

Very truly yours,  
WITTWER PARKIN LLP



Nicholas Whipps



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April 9, 2018

Ms. Rebecca Deming, Community Development Director  
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**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the City of Beaumont General Plan Update (Beaumont 2040 Plan) [SCAG NO. IGR9558]**

Dear Ms. Deming,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the City of Beaumont General Plan Update (Beaumont 2040 Plan) to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

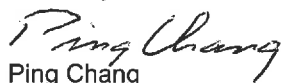
SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the City of Beaumont General Plan Update (Beaumont 2040 Plan) in Riverside County. The proposed project includes a General Plan Update for the 2040 horizon year, as well as a revised Zoning Code and Zoning Map, the Downtown Specific Plan, and the Hillside Development Ordinance.

**When available, please send environmental documentation to SCAG's office in Los Angeles or by email to [au@scag.ca.gov](mailto:au@scag.ca.gov) providing, at a minimum, the full public comment period for review. Please note our new headquarters in Downtown Los Angeles is at 900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017.**

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or [au@scag.ca.gov](mailto:au@scag.ca.gov). Thank you.

Sincerely,

  
Ping Chang

Acting Manager, Compliance and Performance Monitoring

<sup>1</sup> Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE  
CITY OF BEAUMONT GENERAL PLAN UPDATE (BEAUMONT 2040 PLAN) [SCAG NO. IGR95558]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS.

**2016 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
*SCAG does not yet have an agreed-upon security performance measure.	

For ease of review, we encourage 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 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</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>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</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.

## 2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscsc.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

## DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Beaumont		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	51,600	78,800	80,600
Households	6,458,000	7,325,000	7,412,300	18,200	26,700	27,200
Employment	8,414,000	9,441,000	9,871,500	11,400	17,200	18,000

## MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscsc.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.