

6.0 OTHER CEQA CONSIDERATIONS

This section of the Environmental Impact Report (EIR) provides a discussion of other CEQA impact considerations, including Significant Irreversible Environmental Changes and any Mandatory Findings of Significance.

6.1 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

The CEQA Guidelines § 15126.2(d), require that an EIR address any significant irreversible environmental changes that would occur should the proposed Project were implemented. As stated in CEQA Guidelines Section 15126.2(d):

“.....Uses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely, Primary impacts and, particularly, secondary impacts [such as highway improvement which provides access to a previously inaccessible area] generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.”

Future development of the Project would consume limited, slowly renewable, and non-renewable resources. Accordingly, construction on the Project site would result in the direct consumption of resources, which would occur during the construction phase and would continue throughout its operational lifetime of the Project. Development of the Warehouse Site would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and persons to and from individual development sites. Construction would require the consumption of resources that are not renewable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: lumber and other forest products; aggregate materials used in concrete and asphalt; metals; and water. Fossil fuels such as gasoline and oil would also be consumed to power construction vehicles and equipment. However, the temporary use of these resources during construction of the Project would be on a relatively small scale and in a regional context and would not cause a permanent significant regional impact.

Resources that would be permanently committed to consumption by the operation of the Project would be consistent with those currently used in similar warehouses within the City. The resources used by the Project include water, electricity, natural gas, and fossil fuels. However, new construction in California is required to conform to energy conservation standards specified in Title 24 of the California Code of Regulations (CCR). The 2019 California Building Energy Efficiency Standards (CBEES) were adopted on May 9, 2018 and take effect on January 1, 2020. Under the 2019 standards, nonresidential buildings will use about 30 percent less energy than buildings under the 2016 standards. To conform to CCR Title 24, efficient energy use would be designed into all new buildings developed within the Project site. In addition, all new development would be required to comply with all applicable building codes, development standards, and design requirements related to sustainability and energy conservation contained in the City’s Municipal Code and required pursuant to then-current State legislation, executive

orders, and regulatory guidance. Along with applicable City policies and State standards, mitigation measures contained in this EIR would help ensure that all affected natural resources are conserved or recycled to the maximum extent feasible, minimizing the impact significance on each resource to the lowest amount possible.

Energy resources and consumption is discussed in greater detail within **Section 3.5: Energy**.

6.2 SIGNIFICANT AND UNAVOIDABLE ENVIRONMENTAL IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that the EIR describe any significant impacts, including those that can be mitigated but not reduced to less than significant levels. The environmental effects of the Project are addressed in **Sections 3.1** through **3.16** of this EIR. Alternatives to the Project are addressed in **Section 4.0** and growth inducing effects of the Project are addressed in **Section 6.3**. Implementation of the Project would result in potentially significant impacts in some areas of the following topical issues: Aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, tribal and cultural resources, noise, and transportation. Where needed, implementation of standard conditions and requirements (SCs) and mitigation measures (MMs) provided in **Sections 3.1** through **3.16** would reduce many of these impacts to levels considered less than significant. Other environmental issues would have no impacts because SCs and requirements are mandated. Significant, unavoidable impacts are noted below.

Air Quality: Impact 3.2-1

The Project would not violate construction emission standards and would be consistent with Criterion No. 1, with the exception of NO_x emissions which would exceed thresholds even with mitigation.

Greenhouse Gas Emissions: Impact 3.7-1

Long term operational impacts (including construction impacts amortized over 30 years at 47.6 MTCO₂ eq/yr) would total approximately 13,259.79 MTCO₂ eq/yr with mitigation. This would exceed the threshold of 3,000 MTCO₂ eq/yr by 10,259.79 MTCO₂. The majority of emissions would occur from mobile sources and energy use. There are no feasible mitigation measures to beyond those which are already proposed to further reduce mobile source emissions and overall Project emissions would remain above the yearly threshold. Therefore, impacts in this regard would be significant and unavoidable.

Greenhouse Gas Emissions: Impact 3.7-2

The Project's long-term operational GHG emissions would exceed SCAQMD's threshold of 3,000 MTCO₂e per year despite the implementation of mitigation and thus could impede California's statewide GHG reduction goals for 2030 and 2050. Therefore, impacts in this regard are significant and unavoidable.

Transportation: Impact 3.13-2

The Project would exceed the vehicle miles traveled (VMT) threshold of 8.9 for home-based work VMT per employee and 30.4 VMT per service population. The former threshold would be exceeded by 7.44 VMT and second by 1.7 VMT. The Project would include mitigation requiring a Transportation Demand Management Strategy (TDM) to reduce trips; however, even with this, the threshold would still be exceeded. Thus, a significant unavoidable impact would remain.

6.3 GROWTH-INDUCEMENT

Section 15126 of the CEQA Guidelines requires that an EIR address the “growth inducing” effects of the Project. Pursuant to § 15126.2(d) of the Guidelines, a project would be considered to have a growth-inducing effect if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing;
- Remove obstacles to population growth;
- Tax existing community services or facilities, requiring the construction of new facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

Should the Project meet any one of the above-listed criteria, it may be considered growth inducing. The potential growth-inducing impacts of the Project are evaluated against these four criteria in this section.

Section 15126.2(d) of the CEQA Guidelines requires that an EIR “discuss the ways” a project could be growth inducing and to, “discuss the characteristics of some projects that may encourage activities that could significantly affect the environment.” However, the CEQA Guidelines do not require that an EIR predict (or speculate) specifically where such growth would occur, in what form it would occur, or when it would occur.

This section of the EIR analyzes the potential environmental consequences of the foreseeable growth that could be induced by implementation of the Project. Section 15126.2(d) states that: “It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.” Typically, the growth-inducing potential of the Project would be considered significant if: “[The project] fosters growth or a concentration of population above what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies such as the Southern California Association of Governments (SCAG). Significant growth impacts could also occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies.” In general, a project may foster growth in a geographic area if it meets any one of the following criteria:

Section 15126.2(d) of the State CEQA Guidelines (14 California Code of Regulations [CCR]) requires the evaluation of the growth-inducing impacts of a project. This Section is required to determine the manner

in which a project could encourage substantial economic or population growth or construction of additional housing in the surrounding area, either directly or indirectly. Growth inducement is distinguished in various ways: (1) growth that is induced as a result of construction of the project or the infrastructure needed for the project; (2) direct employment, population, or housing growth that would occur on the Project site; (3) growth that is induced by lowering or removing barriers to growth; and/or (4) growth that is induced by creating an amenity or facility that attracts new population or economic activity.

The analysis provided below evaluates whether the Project would directly, or indirectly, induce population, housing, or economic growth in the surrounding environment.

Direct Growth-Inducing Impacts in the Surrounding Environment

Growth inducement can be defined as the relationship between a project and growth within the surrounding area. This relationship is often difficult to establish with any degree of precision and cannot be measured on a numerical scale because there are many social, economic, and political factors associated with the rate and location of development. Accordingly, the State CEQA Guidelines instruct that an EIR should focus on the ways growth might be induced. This relationship is sometimes looked at as either one of facilitating planned growth or inducing unplanned growth. Both types of growth, however, should be evaluated.

In assessing the growth-inducing impacts of a project, § 15126.2(d) of the State CEQA Guidelines (14 CCR) indicates that the lead agency is not to assume that growth in an area is necessarily beneficial, detrimental, or of little significance to the environment. Typically, growth-inducing impacts result from the provision of urban services and the extension of infrastructure (including roadways, sewers, or water service) into an undeveloped area. Growth-inducing impacts can also result from substantial population increase, if the added population may impose new burdens on existing community service facilities, such as increasing the demand for service and utilities infrastructure and creating the need to expand or extend services, which may induce further growth.

To address this issue, potential growth-inducing effects are examined through analysis of the following questions:

1. Does the Project directly or indirectly foster economic or population growth, or the construction of additional housing?

The Project's development would not foster significant economic and population growth within the City directly or indirectly. Any growth will also be indirect as the Project is intended to be a warehouse facility though it does not have an intended owner.

Economic Growth

The Project would not directly or indirectly create significant economic growth within the City. However, the Project may cause an indirect economic growth due to its development. While the Project site would generate revenue to the City through taxes on its revenue, comparative to the City overall it is a relatively

small increase. Construction of the Project would generate employment consistent with other similar construction activities, but this would only be temporarily until construction activities are complete. Most construction workers would be anticipated to come from within the City or from the nearby region, which already has a population of substantial size to supply the needed workers. Upon completion of construction, the Project would require a permanent workforce, but this would not cause a substantial permanent increase in employment. The Project would require approximately 188 new employees. Similar to the above, these jobs would likely be filled by local and regional residents. While a few new workers may relocate to the area, this number would be incrementally small compared to the existing working population.

Population

Beaumont has a population of approximately 48,630 people with a labor force of approximately 22,800 individuals. As of June 2020, approximately 3,100 people were unemployed, creating an unemployment rate of 13.7 percent within the City. The Project, as previously stated, is estimated to indirectly produce approximately 341 new jobs after its completion. The unemployed population, approximately 3,100, within the City is larger than the potential jobs indirectly generated by the Project. The development would therefore not create a demand for increased population or induce substantial population growth as the current employment demand would not be met by the Project.

Additional Housing

The Project does not directly propose new housing units and it would not indirectly result in the creation of, or demand for new housing stock within the City. As discussed above, the Project would not create an increase in the City's population because the majority of the jobs created would be filled by City residents or those from surrounding areas with similarly high unemployment rates. The County of Riverside has a total of 162,300 unemployed residents; approximately 14.8 percent of the population. Therefore, the demand for potential workers would come from existing residents and would not prompt the creation or demand for additional housing stock. Refer to the above sections for further discussion of the Project's employment generation and its relation to employment demand within the City.

2. Does the Project remove obstacles to population growth?

The location of the Project site is currently vacant and undeveloped. The development of the Project site and any appurtenant improvements would not require the removal or demolition of existing structures. The Project is located within area of City and County land. The land in the City has a land use designation of Industrial (I) and a zoning designation of Manufacturing (M). The County land, on which no development would occur on the southerly parcel, has a current land use designation for Rural Residential (RR) and the current zoning designation for both parcels is Controlled Development Area (W-2-20). The Project would result in changes to the land use designations and upon annexation of the County land proposes a General Plan Amendment (GPA) designation for the County parcels to Industrial (I) and a rezoning (for County parcels) to Manufacturing (M).

Doing this would enable use of the site for a non-residential use. The annexation, GPA, and prezone would not remove an obstacle for population growth since the zone change would reduce the amount of areas in the City that could develop housing. This has the effect, were the site to be developed with other non-residential uses or limiting the growth potential and leading to population increase.

3. Does the Project require the construction of new or expanded facilities that could cause significant environmental effects?

The Project does include a dedication for the future extension and construction of Potrero Boulevard and 4th Street by the City. The Project also includes the extension of other utility infrastructures into the Project site. The Project; however, does not propose construction of the roadways and would not make utility services available to any off-site or non-project uses. Refer to **Section 3.13: Transportation** for transportation related impacts.

The Project would involve the development of a 577,920 sf warehouse along with landscaping and other appurtenant improvements. The development of the entire Project site has the potential to create some significant environmental effects. However, any effects of the Project associated with expansion of utilities would be mitigated to remove or reduce their significance. In addition, the Project site would not require expansion of utilities or infrastructure outside the scope of the Project. Existing utility lines would be tied into within the adjacent expansion of Potrero Boulevard and 4th Street, and their associated rights-of-way. The Project would make a right-of-dedication to both roadways. The area into which expansion of the roadways was evaluated in the EIR and impacts were disclosed. Each potentially significant environmental impact and their associated mitigations are fully discussed in the analysis chapters of this EIR. Refer to **Sections 3.1** through **3.16** for those discussions.

4. Does the Project encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively?

Construction activities for Project site would be temporary in nature and properly mitigated in an effort to reduce their significance to the lowest possible levels. Activities associated with the operation of the Project would be similar to those of other similar projects in the City. This includes daily commutes for passenger vehicles and material trucks. The use of the facilities would require the use of energy for lighting, heating, and cooling. These activities and their potential impacts are fully discussed and analyzed within the analysis chapters of this EIR. Refer to **Sections 3.1** through **3.16** for those analyses.