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In Reply Refer To:
FWS/CDFW-WRIV-22B0055-22CPA0058-CR1

May 12, 2022
Sent by email

Christina Taylor, Planning Director
City of Beaumont
Planning Department
550 E. 6th Street
City of Beaumont, Ca 92223

Subject: Criteria Refinement 21-03-09-01 for the Beaumont Pointe Specific Plan, City of
Beaumont, Riverside County

Dear Ms. Taylor,

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (CDFW), hereafter referred to jointly as the Wildlife Agencies, received Criteria Refinement 21-03-09-01 (Criteria Refinement) for the Beaumont Point Specific Plan (Project) from the City of Beaumont (City) via the Western Riverside County Regional Conservation Authority (RCA) on March 11, 2022. The Wildlife Agencies are providing the following comments as they relate to the Criteria Refinement's consistency with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP), and in particular with the MSHCP's Policy for the Protection of Planning Species between Core Areas where options for assembly of connections between Core Areas are limited (Section 3.2.3).

The Wildlife Agencies appreciate the analysis of conservation values and acreages presented in the Criteria Refinement. However, after review we have concerns regarding wildlife connectivity between Core Areas as described below.

Project Description

The MSHCP Implementation Agreement defines the Criteria Refinement Process as "the process through which changes to the Criteria may be made, where the refined Criteria result in the same or greater conservation value and acreage to the MSHCP Conservation Area". The Criteria Refinement is being proposed to accommodate the proposed Beaumont Pointe Specific Plan development, which consists of 246 acres of industrial facilities and 30 acres of commercial facilities within a 405.2-acre site. The Project is located in Proposed Core 3, specifically, within Criteria Cells 933, 936, 1030, 1032, and 1125 of Subunit 1 (Potrero/Badlands) of The Pass Area Plan. The Criteria Refinement proposes approximately 78 acres of additional conservation off-site to the east within Cell Group A'. The proposed off-site conservation is adjacent to an existing conservation area and is generally suitable and appropriate to replace the area described for conservation that would be affected by the proposed Project. The Criteria Refinement Findings specify that the portion of Criteria Refinement proposed for development is located in the City of Beaumont's Sphere of Influence in unincorporated Riverside County and will be

annexed by the City. The Project site directly abuts California State Route 60 to the north and Jackrabbit Trail to the south and east.

Annexation

The MSHCP provides procedures for changes in permittee jurisdiction. Land annexations within the MSHCP Plan Area are to be documented with a Minor Amendment of the MSHCP (Sections 11.5 and 20.4.1(E) of the MSHCP Implementation Agreement and Section 6.10.2 of the MSHCP). The Minor Amendment process is provided to MSHCP Permittees for property annexations that 1) does not significantly differ from the terms of the MSHCP as originally adopted, 2) substantially conforms to the terms of the MSHCP as originally adopted, and 3) will not significantly reduce the ability to acquire the Additional Reserve Lands. The Wildlife Agencies agreed on January 22, 2008, to an expedited review process with a shortened 10-day review period from the original 60-day review period. Consequently, as required by MSHCP, the City will need to prepare and submit to the Wildlife Agencies a Minor Amendment request for any annexation associated with this Project. Thus, it is our recommendation that a Minor Amendment be completed prior to the submission of a Joint Project Review or a Determination of Biologically Equivalent or Superior Preservation for this Project.

Connectivity for North-South Wildlife Movement

The Beaumont Pointe Specific Plan development site is located in the Potrero/Badlands Subunit (Subunit 1) of The Pass Area Plan. The MSHCP Planning Species for the Potrero/Badlands Subunit include mountain lion, bobcat, the threatened Stephen's kangaroo rat, Bell's sparrow, and Southern California rufous-crowned sparrow, among other species. The maintenance of large blocks of Habitat for large mammal movement between the northern and southern sections of the San Bernardino National Forest, and Core and Linkage habitat for mountain lion are among the identified Biological Issues and Considerations (Section 3.2.3) for this Subunit.

To accommodate the wildlife movement considerations mentioned above, the California Department of Transportation and the Riverside County Transportation Commission expended significant local, State, and federal dollars to construct a wildlife crossing beneath State Route 60 (Highway 60) at the northwest end of the Project site to enabling large mammal movement between the interior of the Proposed Core 3 and the area north of Highway 60 and the San Bernardino National Forest. Public funds were expended identifying a location for this mammal crossing that is biologically appropriate (usable by mountain lions and bobcats), technically feasible (buildable), be financially feasible and would not constrain or jeopardize traffic flow on Highway 60. Years of effort went into selecting a feasible location, and then designing this undercrossing so that it would function to enable large mammal movement between Proposed Core 3 and the area north of Highway 60.

If the Project is built with the current design, the existing wildlife crossing would direct wildlife into a small north-south trending valley which terminates at a steep ridgeline with topography that does not facilitate animal movement into the interior of Proposed Core 3. We are concerned that mountain lion and bobcat use of the corridor would be inhibited by the narrowness of the

canyon and the proximity of Project activities (the sights and sounds of people, moving vehicles, nighttime lighting, and noise on the Project site). Edge effects from adjacent development or disturbed areas can be biologically significant for distances of at least 300 meters within corridor areas (Beier 2018). Large mammals tend to be guided by terrain when moving across large landscapes such as utilizing valley and canyon bottoms preferentially over steep slopes. Mountain lions prefer relatively wide buffers between their movement corridors and nearby human activity, and in general wildlife corridors should be at least 2 km wide where feasible (Beier 2018).

To avoid the degradation of the existing large mammal crossing, the Wildlife Agencies request that the development footprint be modified to pull out of Criteria Cell 933 (approximately 34 acres) and include the larger connecting valley in the Criteria Refinement conservation strategy so that large mammals can traverse the valley southward into Proposed Core 3 and northward to the wildlife undercrossing. We understand that the proposed development footprint might shift to accommodate this change. We also acknowledge that some of the area in Criteria Cell 933 where we have requested avoidance is not described for conservation, however, the public investment in the Highway 60 undercrossing and the benefit to the MSHCP Conservation scenario should not be eroded by the Project.

The inclusion of the area in Criteria Cell 933 in the Criteria Refinement conservation strategy would provide live-in habitat for smaller MSHCP Covered Species in the linkage. Additionally, Section 3.2.3 of the MSHCP specifies that “Management of edge conditions in the Badlands will be necessary to maintain high quality habitat for these species in areas which may be affected by covered activities ...”, further highlighting the need to minimize edge effects from development in key locations such as the valley leading to and from the existing large mammal crossing.

Additional Concerns

The proposed Project design appears to have ingress and egress only at its southeastern end. It is the Wildlife Agencies’ experience that in areas with relatively high fire risk (such as the badlands), Projects often require a secondary access route for fire safety and emergency services. We would like to be clear that should future development on the the Beaumont Pointe Specific Plan site need additional fire evacuation or firefighting access routes, the additional routes cannot be placed or routed through conservation areas.

Conclusion

The Wildlife Agencies do not concur that the proposed Criteria Refinement is superior or equivalent to what is currently described for conservation within Proposed Core 3. However, as stated above, we think that the Proposed Core 3 Criteria Refinement would be viable with the change in the Project footprint discussed above. We therefore recommend that the Project and Criteria Refinement be revised to remove the proposed development footprint from Criteria Cell 933 and include those approximately 34 acres in the conservation strategy to avoid compromising the large mammal movement corridor, so that the Wildlife Agencies can concur that the proposed Beaumont Pointe Specific Plan Criteria Refinement would be superior or

equivalent to what is currently described for conservation on the Project site. In addition, a Minor Amendment for the annexation of the proposed Project area from unincorporated Riverside County to the City of Beaumont would be required.

We appreciate the opportunity to provide comments on this Criteria Refinement proposal, and look forward to continuing to work with the City of Beaumont on this Project. We are available to discuss the requested change with the City and your applicant. If you have any questions or comments regarding this letter, please contact James Thiede of the Service at james_thiede@fws.gov or Carly Beck of the CDFW at carly.beck@wildlife.ca.gov.

Sincerely,

**Karin
Cleary-Rose**
for
Rollie White
Assistant Field Supervisor
U.S. Fish and Wildlife Service

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for
Scott Wilson
Environmental Program Manager
California Department of Fish and Wildlife

ec:

Tricia Campbell, Regional Conservation Authority
Ken Baez, County of Riverside Planning Department

Literature Cited:

Beier, Paul. (2018). A rule of thumb for widths of conservation corridors: Width of Conservation Corridors. Conservation Biology. 33. 10.1111/cobi.13256.