

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



January 11, 2009

VIA ELECTRONIC MAIL AND FACSIMILE

The Hon. Roy Wilson
Riverside County Board of Supervisors
4080 Lemon St. 5th Floor
Riverside, CA 92501

RE: Item 15, General Plan Amendment Initiation Proceedings (January 13, 2009)

Dear Chairman Wilson and Members of the Board:

The Endangered Habitats League (EHL) wishes to express some general concerns about the landowner-initiated GPA process and then comment about specific items on the January 13 agenda.

As you know, the Five-Year Update Cycle is the time to take stock of the County's future. Over the last five years, your Board has exerted commendable discipline over proposed Foundation amendments. In our view, it is imperative that this discipline now be extended to both the landowner-initiated and County-initiated GPAs. A list of suggested guiding principles is as follows:

- The Foundation map should not be eroded unless to correct errors or in the event of *compelling* planning reasons. The vision of the 2003 General Plan is not broken.
- The Board should provide stability for land use and transportation planning, and focus on making better use of the large amount of land already designated for Community Development.
- The Board should protect intact Rural and Agriculture lands from both urban and estate lot (Rural Community) development. The latter is inefficient and thus costly in terms of infrastructure and services.
- Land within MSHCP Criteria Cells should not be up-planned except in carefully selected instances where, consistent with the MSHCP, it provides an incentive for a site design that better implements the MSHCP.
- Finally, the Board should fully implement a key recommendation of the Riverside County Fire Hazard Reduction Task Force to reduce future loss of life and property and save the taxpayer money:

Update the Riverside County General Plan and complete consistency zoning actions to limit residential growth within or adjacent to high fire hazard areas.

We have the following concerns with the process to date, and request that the next Five-Year Update Cycle be improved to address these concerns:

- Given the importance of the Five-Year Update Cycle, there should have been more outreach to interested stakeholders for both the landowner-initiated GPAs and the County-initiated GPA 960 process.
- There is insufficient coordination between GPA 960 and landowner-initiated GPAs. For example, in the Coachella Valley, 13,000 acres of urban conversion is being initiated through the landowner process, with thousands more acres of such conversion being considered in GPA 960. Landowner initiation is proceeding absent an understanding of the "big picture" of what amount of additional Community Development land is actually needed or a meaningful discussion of where, from an infrastructure and services standpoint, it might best be sited. This non-comprehensive approach defeats the purpose of the Five-Year Cycle.
- The 140 landowner-initiated GPAs are not being presented to the public in a holistic manner, for example in workshops, even though they have the potential to erode the Foundation system. Instead of a "user friendly" approach, members of the public must track multiple Commission and Board agendas.
- Some decisions to date reflect a lack of planning discipline, such as GPA 996 (600 acres of remote Rural land in the Pass/National Forest area, of high fire hazard, initiated as a conversion to Rural Community estates).

Comments on specific items on the January 13, 2009 agenda are as follows:

Item 15.1, GPA 963 (Lake Mathews)

Concur with the staff recommendation for non-initiation, as the proposal would introduce a "spot zone" of Community Development in generally rural area. The result would not be orderly development in the context of a larger urban plan. Furthermore, the proposed change would undermine MSHCP planning in a Criteria Cell.

Item 6.4, GPA 994 (Jurupa)

Concur with the staff recommendation to change Rural Community to Community Development Overlay. The property borders substantial urban development and is surrounded by golf course and Rural Community. If developed, the site should be used efficiently rather than subdivided into estate lots. However, staff correctly notes that there is as yet no comprehensive plan for urbanization of the area, and it is thus appropriate to use the Overlay pending such planning. We are troubled, though that no information has been provided as to whether there is an overall shortage of land already designated as Community Development, and if more is actually needed.

Item 6.5, GPA 1024 (Mira Loma)

No position.

Item 6.7, GPA 983 (San Jacinto Valley)

Insufficient information. This property is currently designated Open Space: Conservation, which is defined as follows:

Open Space-Conservation (OS-C) - The Open Spacc-Conservation land use designation is applied to land designated for preservation of non-MSHCP habitat lands, protection from natural hazards, and preservation of scenic and other natural resources. Ancillary structures or uses may be permitted provided that they further the intent of this designation and do not substantially alter the character of the area. Actual building or structure size, siting, and design will be determined on a case by case basis.

No information has been provided in the staff report as to why the land was so-designated in 2003, what has changed since then, or why the original designation is in error. *If* in error due to surrounding highways and development, and *if* the site does not represent scenic, natural resources, or natural hazards, then a change may be appropriate.

Thank you for considering our views, and we look forward to working with you on a successful Fire-Year Update Cycle.

With best wishes for the New Year,



Dan Silver, MD
Excutive Director

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Interested parties