

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



March 22, 2009

VIA FACSIMILE AND ELECTRONIC MAIL

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

RE: Item 15, General Plan Amendment Initiation Proceedings (March 24, 2009)

Dear Chairman Stone and Members of the Board:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on this set of landowner-initiated GPAs. Once again, many of these items have serious land use implications. It is essential for your Board to take a "hard look" and deny Foundation-change proposals that do not meet the test provided by the General Plan:

- a. The foundation change is based on ample evidence that *new conditions or circumstances* disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan. (Emphasis added.)

Item 15.1, GPA 923 (Mead Valley)

Concur with staff recommendation for denial of initiation due to the community boundary issues described and the surplus of nearby vacant commercial property.

Item 15.2, GPA 920 (Southwest Area Plan) (72 acres)

Item 15.3, GPA 986 (Southwest Area Plan) (19 acres)

Item 15.4, GPA 1026 (Southwest Area Plan) (150 acres)

Disagree with the staff recommendation to initiate the change of a total of 241 acres of Rural, Rural Mountainous, and Agricultural land to Community Development on the basis of a "trend" that is nothing other than the trend of sprawl. No new circumstances are documented that compel these Foundation changes, and indeed, they are contrary to the vision of a greenbelt. At stake is a block of highly intact rural and agricultural land on the eastern border of Highway 79 urbanization. These very lands now form an urban edge that *defines* communities, with urban to the west and rural and open space to the east.

Without planning justification, staff is recommending a series of GPAs that would transform this area and push development further east along the scenic Highway 79 corridor. Current traffic congestion on Highway 79 should alone be enough to deny these

proposals. The "progression of Community Development land use designations" referred to in the staff report is simply a progression of *requests* for GPAs that is being confused with real planning.

What is the vision for this region, and how was it arrived at? What community outreach occurred? What is the City of Temecula's view? What is the absorption capacity (in years of growth) of the current General Plan? Is more urban land needed, and on what basis? What growth accommodation alternatives were considered other than greenfield development? If more urban land is needed, where is it optimally sited given transportation, open space, and greenhouse gas considerations? *These questions are never asked let alone answered.* While adjacency is *one* legitimate factor, it is not *sufficient* to justify land conversion.

This group of GPAs illustrates how the landowner-initiated process has become piecemealed and how it is failing to consider the "big picture" questions posed above. This group of GPAs also typifies the loss of rural, agricultural, and open space without the justification of new planning circumstances. Where will the eastward progression of rural conversion stop? How far behind are requests for the land *adjacent* to these GPAs to follow the "trend" and follow suit? The rigor needed to conduct a successful Five-Year Update is missing from the staff recommendation, and denial is an important step in retaining the integrity of the General Plan Update.

Item 15.5, GPA 771 (Coachella)

Item 15.6, GPA 828 (Coachella)

While EHL is not familiar with the South Valley Implementation Plan (SVIP), of which these proposals are parts, based on the information contained in the staff report, we *disagree* with the recommendations. A total of 641 acres of agriculture would be converted to residential Community Development/Specific Plan absent an analysis of the absorption capacity of existing urban-designated land in the region or of ways to accommodate growth while minimizing greenhouse gas emissions. Rather than a Community Center, typical sprawl is proposed.

Item 15.7, GPA 990 (Coachella)

Concur with staff recommendation for denial of initiation due to the inconsistency with the rural character and the vision for the area, as well as lack of infrastructure. No new circumstances have been put forward to justify a Foundation change for 808 acres from Open Space-Rural to Community Development.

Item 15.8, GPA 1068 (Coachella)

While EHL is not familiar with the South Valley Implementation Plan (SVIP), of which this proposal is a part, based on the information contained in the staff report, we *disagree* with the recommendation. 165 acres of groves, currently planned for light industrial, in the heart of an agricultural area, would be converted to residential Community Development/Specific Plan absent an analysis of the absorption capacity of existing urban-designated land in the region or of ways to accommodate growth while

minimizing greenhouse gas emissions. Rather than a Community Center, typical sprawl is proposed.

Item 15.9, GPA 1071 (Coachella)

No position

Item 15.10, GPA 841 (Lakeview Nuevo)

No position.

Item 15.11, GPA 1012 (San Timoteo/Pass)

Concur with the staff recommendation for denial of initiation. The conversion of 41 acres of Rural and Rural Mountainous land to Rural Community estate lots would be inconsistent with community character and with the surrounding parcels. It would also increase residential intensity in high fire hazard locations, contrary to the recommendation of the Riverside County Fire Hazard Reduction Task Force:

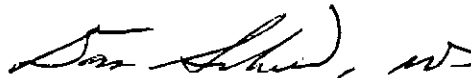
Update the Riverside County General Plan and complete consistency zoning actions to limit residential growth within or adjacent to high fire hazard areas.

Item 15.12, GPA 1069 (Coachella)

No position

In conclusion, many of these GPA proposals present important opportunities to maintain the integrity of the Foundation system, retain community character and agricultural resources, and promote orderly growth. Once again, we appreciate being able to work with you on a successful Fire-Year Update Cycle.

With best regards,



Dan Silver, MD
Executive Director

cc: Clerk of the Board
Board offices

electronic cc: George Johnson Mike Harrod
Ron Goldman Katherine Lind
Damian Meins Interested parties