

December 15, 2008

VIA ELECTRONIC AND SURFACE MAIL

Mitra Mehta-Cooper
Planning Department
County of Riverside
4080 Lemon Street, 9th Floor
Riverside, CA 92501

RE: GPA 960 (Materials distributed for Dec. 2, 2008 Advisory Committee)

Dear Ms. Mehta-Cooper:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these General Plan update materials. For your reference EHL participated extensively in the 2003 Riverside County Integrated Project and is dedicated to a sustainable future for Riverside County.

General Plan amendment cycle

An eight-year cycle has been adopted by the State in SB 395 for the Sustainable Community Strategy and greenhouse gas targets and the RHNA process. Thus, the Certainty System cycle – at which time major land use changes such as foundation changes are considered – should also align at 8 years. Otherwise, out-of-synch planning will cause multiple logistical problems.

Rural Incidental Commercial: Commercial Retail Zone

The numerous uses allowed by this zone are largely urban in nature and do not comport with the purpose of the zone, which is residential and tourist serving businesses along highway corridors that are cannot be located in rural villages, towns, or suburban centers. Examples are museums, libraries, dry cleaning, professional offices, etc. The broad scope of allowable uses would divert commercial uses out of towns, and harm the rural character. At a minimum, the allowable and conditionally allowable uses need tailoring to the ostensible purpose of the zone. Furthermore, it is unclear if this zone is needed at all, given the local-serving businesses already present in rural areas.

Rural Villages

We concur with the sound staff recommendation for no RVLUO in El Cariso, which should be replicated in other locations with the same basic conditions – lack of

infrastructure and services to support greater intensity, a high risk of fire, or environmental constraints such as habitat sensitivity.

We remain concerned over the need or desirability for even a *limited* RVLUO in Meadowbrook, as recommended by staff. A vital yet unanswered question is how a “rural village” would be created out of standard low and medium residential designations, which typically result in tract housing. Until the County provides mandatory design guidelines for RVLUO, the notion of a “village” is illusory and the result will be suburban sprawl and loss of rural character.

Potential Development Land Use Overlays

We concur that the goals of agricultural and rural preservation would be contravened by a Potential Development Land Use Overlay in the San Jacinto Valley, and that urban development there makes no sense from an infrastructure and service standpoint. These same considerations should apply to other Potential Development Land Use Overlay proposals. Remaining unanswered, though, is why *any* conversion of Rural or Agricultural land to Community Development intensities is needed to accommodate projected population growth. Why cannot all growth be accommodated within areas already planned for such purposes by the County and the cities?

Landowner-initiated foundation component GPAs

Recognizing that piecemeal GPAs had prejudiced planning goals in the past, a primary purpose of the Certainty System is to consider landowner-initiated GPA proposals that involve a change in foundation component *comprehensively* at the 5-year cycle. At this time, they can be put into a “big picture” context and any changes to the overall vision publicly debated.¹

We understand that dozens of such parcel-specific foundation change GPAs have been requested outside of the County-initiated 960 process. It is essential that staff closely evaluate these proposals on the merits and also coordinate them with the GPA 960 process *before a decision is made on formal initiation*. Initiation by the County – a virtually irretrievable commitment – must only occur *after* GPAC and the public have been able to evaluate the landowner-initiated GPAs *as a whole*, and have had the opportunity to provide input. Proceeding otherwise would thwart the very purpose of the 5-year cycle. In general, unless there is a clear error in the original designation as Rural or Agriculture, there is likely to be no planning rationale for converting such land to Community Development or Rural Community.

¹ According to the Administrative Element, a key objective of the Certainty System is to “Avoid erosion of the foundation components upon which the General Plan is structured by requiring consideration of any changes to them to be conducted in a *comprehensive manner*.” The 5-year cycle “[i]s the only time, other than a declared extraordinary amendment or an Agriculture Foundation Component amendment, that a Foundation Component of the General Plan may be considered for change.” (Italics added.)

Once again, it is our privilege to work with the Planning Dept. and the Advisory Committee, and thank you for considering our comments.

With best wishes for the Holidays
and New Year,

Dan Silver, MD
Executive Director

Electronic copy: Ron Goldman, Planning Director
Mike Harrod