

**COUNTY OF RIVERSIDE**  
**TRANSPORTATION AND LAND MANAGEMENT AGENCY**

*George A. Johnson · Agency Director*

**Planning Department**

*Ron Goldman · Planning Director*

**Memorandum**

**DATE:** December 2, 2009  
**TO:** The Planning Commission  
**FROM:** Matt Straite  
**RE:** **Additional information provided after the staff report was printed for Item 7.1, The Villages of Lakeview**

Planning Commission,

The following information was provided after the staff report printed.

- An additional letter has been received after the staff report was printed pertaining to this project. The following letter is attached-
  - Sue Nash for the Friends of Northern San Jacinto Valley dated December 2, 2009

FRIENDS OF THE NORTHERN SAN JACINTO VALLEY  
P.O. Box 9097  
Moreno Valley CA 92552-9097  
[www.northfriends.org](http://www.northfriends.org)

Riverside County Planning Commission  
c/o Matt Straite  
Riverside County Planning Department  
4080 Lemon Street  
P.O. Box 1409  
Riverside CA 92502-1409

December 2, 2009

RE: The Villages of Lakeview: SP # 342, DEIR # 471

Planning Commissioners:

The Friends of the Northern San Jacinto Valley are more opposed than ever to the Villages of Lakeview (VOL) project, SP 342. The project is only "green" in the way that it is going to change development rights on prime agricultural land. The developer, who has indicated that he will not build this project until economic conditions return to 2006-2007 levels and will not build any retail/commercial (i.e. revenue producing) until he personally feels the economic conditions are viable, is playing a numbers game. It is alleged that in the City of San Jacinto, the city council gave development rights to a developer who had no intention of building his project, but planned to use those development rights to sell his former agricultural land to the Riverside County Transportation Commission for building the roads and on and off ramps for the Mid-County Parkway. What financial arrangements have been made with the Lewis Operating Corp and Randall Lewis as to the his land which will be needed to construct the three or more on and off ramps for the Mid-County Parkway which are proposed on the VOL site?

Another way for the Lewis Operating Corp and Randall Lewis to financially benefit is to hold the Department of Fish and Game (DFG) hostage to the threat of placing nearly 3,000 dwelling units, a school, a community center, a regional park with unknown recreational facilities, and a nursery for exotic trees and plants on the southern border of the San Jacinto Wildlife Area (SJWA). In addition, the Planning Director has submitted maps showing that a new proposed "City of Lakeview" would take in at least one thousand acres of the SJWA. In order to preserve the SJWA and Lake Perris State Recreation Area as viable Multi-Species Habitat Conservation Plan reserves, and as

hunting and nature research and viewing areas, the public will have no choice but to purchase the VOL lands north of the Ramona Expressway.

Either of these or other similar scenarios is nothing more than a \$green\$ gift of millions of dollars to speculators.

The staff report states that findings of over-riding consideration will be made for the following unavoidable adverse impacts:

1. Air quality
2. Agriculture
3. Population/housing
4. Land use
5. Aesthetics
6. Cultural resources
7. Noise
8. Traffic

Because we do not know when the project will be built, it is impossible to evaluate what the environmental impacts will actually be or what the possible mitigation measures available might be at that time which could reduce these impacts to a level of non-significance. Therefore, new ways to reduce environmental impacts may be foreclosed. That would be a tragedy for the people of Riverside County.

The additional fiscal impact information submitted for today's hearing inexplicitly indicates that the VOL project will have a positive fiscal impact on the County based on "current fiscal conditions" which they state are the 2006-2007 budget conditions. It does not take a Ph.D. in economics to understand that 2006-2007 budget conditions are not current. What is current is a County budget with reduced revenues which has therefore reduced the services which it is able to provide to its residents. What is this fiscal analysis trying to say? That when housing prices go back up to August 2007 levels and this project will begin construction, the property tax revenues from this project will be more than the expenses of this project because the County is reducing the money it spends on services to County residents?

This seems to run contrary to the Planning Commission's concern about the level of fire and police services provided to these residents. In addition, what does this mean for the level of County Health and other Social Services which are being cut back by the County during this current and continuing budget crisis?

It is clear that although the "recession" has been declared over, unemployment continues to increase (at a lower rate) and housing foreclosures continue to increase. The fiscal chart indicates that County revenues are on a straight downward course and the fiscal expert who testified indicated that he had no idea why he picked August 2007

housing prices as the time VOL would begin construction or when housing prices might rise to August 2007 levels again.

Regardless of what finding of over-riding consideration the County eventually makes pursuant to CEQA Guidelines section 15093(b), it is irresponsible of the Planning Commission to approve a project which under the 2007-2008 budget has admitted it will be a fiscal detriment to the County. In addition, the VOL did not provide a fiscal impact analysis for the current 2009-2010 budget, although it did show that County revenues are plummeting rapidly. As requested earlier, this 2009-2010 fiscal impact analysis must be provided as the numbers are clearly available.

Bottom line: As the start and completion of this project is unknown, any fiscal impact analysis is unknown. Despite what the developer says, if this Environmental Impact Report and Specific Plan is approved, any builder could begin construction of more than two-story apartments in any of the planning areas to the maximum of the density provided in each planning area at any time. The school district would then need to scramble and try and buy land and build schools within their constraints or bus students over the Ramona Expressway to the Nuvew Schools.

Because the time of building and completing this project is unknown and the water supply from MWD and its sources in the State Water Project and the Colorado River are in a crisis due to global warming caused problems (salt water intrusion; drought; reduced snow pack) and various environmental and stability problems with the Bay Delta, it is impossible to know whether or not water will be available in 10 to 50 plus years from now to begin or complete this project. It is neither responsible nor legal to state that the County (using residents' tax dollars) will approve this project and change the zoning to give development rights for 11,000 plus units, but that if there is no water, we simply will not issue building permits. The legislation requiring Water Supply Assessments from Eastern Municipal Water District were enacted to **prevent**, not to allow, this kind of action on the part of the County.

It was indicated in the staff report that DFG may provide more information to the County. Any change to the position taken by DFG in their letter of April, 2009, must be in writing and must be available for public review and comment before the Planning Commission approves this project.

Susan L. Nash  
Board Member  
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