

VIA ELECTRONIC MAIL District4@RIVCO.ORG

February 14, 2024

V. Manuel Perez
District 4 Supervisor
County of Riverside
4080 Lemon Street
Riverside, CA 92501

Dear Supervisor Perez:

The undersigned organizations urge the County to take action during the current General Plan Amendment cycle to delete Eastern Coachella Valley Area Plan (ECVAP) Policy 2.3 via a County-initiated General Plan Amendment (GPA). It is our understanding that CEO Juan Perez and Planning Director John Hildebrand support the deletion of Policy 2.3 and will be coordinating with your office in the near future regarding this.

We are not certain as to what the Planning Director’s specific proposal will be, but from our perspective what is warranted is the complete and straightforward deletion of ECVAP Policy 2.3 for the reasons outlined in this letter and described in detail in the attached draft Resolution which we have provided for the County’s consideration. We also note that in our view this is not a Foundation Component change since the existing Foundation Component of Open Space – Rural is appropriate and would remain in place. Rather, the appropriate action is simply to delete the anachronistic ECVAP Policy 2.3 from the General Plan. Deleting Policy 2.3 has no effect on the Foundation Component land use designation.

In 2019, you were instrumental in denying the controversial Paradise Valley Specific Plan proposed between Joshua Tree National Park and the Mecca Hills Wilderness. As you will recall, it was ECVAP Policy 2.3 which enabled the project proponent to attempt to change the Foundation Component for that remote area from Open Space – Rural to Community Development if certain criteria could be met. The Board Resolution denying the project cited numerous ways in which the proposed development was unable to meet those criteria, was inconsistent with the Riverside County Vision, and inconsistent with various Elements of the General Plan. It is now clear that any “new town” development in this area would display the same inconsistencies and conflicts; thus, the inescapable conclusion is that Policy 2.3 itself is inconsistent with the Riverside County Vision and other Elements of the General Plan, and should be deleted. Policy 2.3 opened the door for a devastatingly incompatible project; it is now time to shut the door and eliminate this anachronistic loophole provision.

Policy 2.3 countenances significant urban development in a remote, environmentally sensitive area 17 miles from existing urban infrastructure. From a public policy and good planning

perspective, there are many reasons why such development is wholly inappropriate. Of particular importance are:

- Threats to lives and property from the types of events recently experienced in the California desert, including Tropical Storm Hilary and the massive York wildfire.
- Lack of necessary infrastructure and public and private facilities and services to support urban development without massive investments and inefficiencies; as well as profound challenges to provide emergency personnel, including medical, and services to respond to increasingly likely natural disasters.
- Diversion of scarce County resources needed by existing underserved communities by serving a remote and inappropriate project instead.
- Gross inconsistency with the CVMSHCP Conservation Goals and Objectives, and major adverse impacts to the adjacent federally protected areas of Joshua Tree National Park and the Mecca Hills Wilderness.
- Unavailability of assured long-term reliable water supplies in a mega-drought era in which California must adapt to diminishing availability of imported water by significantly reducing water consumption.
- Development in such a remote area rather than adjacent to existing urban services would cause significant commuting for work, shopping, medical needs, etc., with major impacts on air quality and climate change in violation of state law.

We urge the County to delete ECVAP Policy 2.3, and look forward to working with the County on this important matter.

Sincerely,

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