



WE ARE TEMESCAL VALLEY

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Oct. 2, 2016

**Riverside County Planning Commission
c/o Phayvanh Nanthavongdouangsy
Planning Department (12th Floor)
Riverside County Administration Center
4080 Lemon Street
Riverside, CA 92501**

Re: General Plan Amendment No. 1122, Ordinance No. 348.4840, and Change of Zone No. 7902

Dear Planning Commissioners:

This letter shall serve as opposition to the proposed change in zoning specifically involving the Lee Lake Community. Beginning on page 35 of the Planning Department Staff Report regarding the proposed General Plan Amendment (GPA) dated April 4, 2016, there is a description of the methodology for determination of the placement of new Highest Density Residential Neighborhoods (HHDR).

It is noted in the report on pages 36-38 policies applying to the Lee Lake Community (LLC) that reflect what amenities should or shall be present including:

1. "Paseos and pedestrian and bicycle paths"
2. "convenient pedestrian, bicycle and other non-motorized vehicle access to the community's schools, jobs, retail and office commercial uses, park and open space areas ... that support the community needs on a frequent and, in many cases, daily basis"
3. Designs for new use to "provide or potentially accommodate convenient public access to alternative transportation facilities and services"
4. All new residential shall have designs to "sufficiently reduce traffic noise levels" and "sufficiently reduce noise levels" and other adjacent industrial uses

On page 37 it is noted that "The intent of the new growth patterns and the new mobility systems is to accommodate the transportation demands created by future growth and to provide mobility options that help reduce the need to utilize the automobile."

Page 38 indicates that "A multi-purpose trails system is a critical part of this area plan because of the concentration of critical linkages centered here."

It is noted that a series of criteria were adopted in this analysis of proposed sites which are referenced on pages H-149 and H-150.

A review of these policies, intent and criteria as well as any investigation of the current or proposed amenities in LLC clearly demonstrate that LLC meets few of the criteria that would result in a successful implementation, let alone a successful long-term community placement. As such, any zoning change to LLC is inappropriate and unwarranted.

- A. The representative for the County at the last Temescal Valley Municipal Advisory Council on September 14 informed the audience that LLC met at most 3-4 of the 13 criteria and it was one of the lowest scoring areas of all selected by the County for rezoning.
- B. There are little to no jobs to service the community within 1 mile and there is no convenient accessibility to jobs by rail or bus transit. The closest rail is the Metrolink station located 12 miles away; the closest CommuterLink bus stop (and only bus stop in Temescal Valley), is at Tom's Farms which is approximately a 2-3 mile walk.
- C. Retail is located in Sycamore Creek, but that must be accessed by either a vehicle or a walk under the 15 Freeway of approximately 1-2 miles each way.
- D. The closest elementary and intermediate school is Luiseno which is more than 1 mile away and is at or close to capacity. The closest high school is 8 miles away.
- E. There are no current bicycle trails/lanes along Temescal Canyon Road which is adjacent to the proposed community.
- F. The only ingress and egress is Temescal Canyon Road with no "pedestrian-oriented connections to neighborhood facilities and services."
- G. Currently, the closest park is in Sycamore Creek, which is more than a mile away and only accessible by motor vehicle or walking under the I-15 Freeway along areas with no walking trails/sidewalks.
- H. There are no community centers, nor child care centers located within 1 mile.
- I. There are no hospitals, medical centers or clinics located even within 2-3 miles.
- J. There are no churches located within 1 mile.
- K. There is no existing or planned bus stops within a 15-minute walking distance.
- L. The proposed area is located adjacent to or within a very short distance of a major environmental hazard, i.e. an Earthquake Fault Zone.
- M. The proposed area is in a Fire Hazard Severity Zone and adjacent to a Flood Hazard Area.
- N. The proposed area is located immediately adjacent to the I-15 which is the main means of transit between the Inland Empire and San Diego, and the only means of transit to the 91 Freeway westbound to Orange County.
- O. Accessibility to any of the criteria services must be by either motor vehicle or walking extended distances on areas that do not have adequate sidewalks/trails.
- P. Motor vehicle usage is and will be severely affected by existing traffic gridlock, exacerbation of the gridlock by additional communities either in development or that will be in development within the next 1-2 years.
- Q. There are no plans at this time to expand the I-15 to even meet existing needs, let alone future needs caused by thousands of new homes just in the LLC area. The current plans for construction on the I-15 call for extension of the HOV lanes to Cajalco only. This will create a gridlock at Cajalco. Developments at Terramor, Sycamore Creek, Lee Lake, Arantine Hills, new apartments at Dos Lagos, and an approved development in Lake Elsinore will bring an additional 12,600 homes and apartments. That massive influx of traffic is not accommodated by existing or future plans. Absent significant public transportation and creation of multiple and extensive pedestrian walkways/trails, no one will be able to reach community services. A natural disaster will only wreak further havoc to a landlocked community.
- R. While there are proposed plans to expand Temescal Canyon Road, with the influx of homes and apartments, not including the proposed HHDR units, that only alternative to the I-15 will be gridlocked to a standstill even on regular days.

While it is noted and appreciated that a portion of the proposed HHDR site has been modified since the proposal was first presented, to include MUA zoning for the smaller LLC North community (to include 50 percent HHDR), this recent change will in no way affect the objections noted above. There has been no assurance of what businesses and services will be placed in the MUA zone, when they will be placed there or whether they will meet any of the needs identified in the criteria for selection of HHDR zones.

Additionally, it has been determined that the County recently voted to cut sheriff patrols/deputies in the unincorporated areas of Riverside County. The County's goal of having 1.5 deputies per 1,000 population has never been fulfilled. It is understood that the current ratio is 1.02 deputies per 1,000 population and with further cuts, that ratio will go down. With Temescal Valley (where LLC is located), having a current population of approximately 24,000 residents, there should be a patrol base of 24 deputies. Currently, there are about 3,748 dwelling units either under construction, approved or pending approval (including the proposed HHDR), for Temescal Valley. Assuming a conservative 2.5 persons per household, this will result in an additional population of 9,370 people and yet a decrease in patrols and deputies in the already under-served Temescal Valley community.

The essence of the objections to the change of zoning in the LLC to HHDR is that the County has identified criteria in evaluating locations of HHDR zones, yet has proposed LLC as a location that meets extremely little of the criteria deemed important to the new communities. We find it intrinsically inconsistent to espouse the necessity of surrounding amenities for the proposed community, yet place the housing in an area virtually bereft of the very amenities and services needed.

While it is referenced in the report that "... no site is ideal from all perspectives," the LLC location is as far from ideal as can be possible. Simply placing a new community in a location that cannot be adequately supported by services is tantamount to planning failure.

If the County insists on going forward with the rezoning of LLC as HHDR, let this letter serve as insistence that the plans shall include increases in infrastructure before any development on the proposed area identified as LLC as follows:

1. Expansion of the I-15 Freeway.
2. Construction of sidewalks in each direction along Indian Truck Trail under the I-15 Freeway.
3. Creation of extensive, safe walkways from the community to community services including but not limited to parks, retail, bus stops, community centers, child care centers.
4. Creation and incentives for medical facilities, child care centers.
5. Expansion and creation of additional primary and secondary education facilities.
6. Creation of public transportation service, i.e. a fixed-route bus line and multiple stops within and throughout LLC and the adjacent Temescal Valley community to encourage non-motorized vehicle travel. Dial-A-Ride services are needed, as well.
7. Provide incentives to businesses to relocate to areas within a short distance of LLC and Temescal Valley to further alleviate traffic gridlock.
8. Increase the capacity of Temescal Canyon Road to further support the influx of known development.
9. Increase the capacity of adjacent freeway on-ramps and off-ramps by expansion as well as metered means for ingress and egress from the freeway.
10. Place a sheriff substation in the community where LLC MUA is identified with a concomitant increase in deputies and patrols to be in line with the goal of 1.5 deputies per 1,000 persons as is stated in EIR 548.

If these mitigation necessities are too onerous, perhaps the County should re-evaluate the location of HHDR to a location less in need of such significant mitigation.

Respectfully,

**Jerry Sincich, Chairman
We Are Temescal Valley Development Committee**

**Jannlee Watson, Chairwoman
We Are Temescal Valley Communications Committee**