



October 25, 2019

Supervisor V. Manuel Pérez  
Riverside County District 4  
73710 Fred Waring Dr. Suite 222  
Palm Desert, CA. 92260



**Re: Thermal Beach Club**

Dear Supervisor V. Manuel Pérez,

The undersigned organizations and community leaders write to highlight several of the concerns we share with respect to the proposed Thermal Beach Club project. We formally request that the Board of Supervisors delay consideration of the proposal and invite you to meet with the community to further discuss the project. Given the large-scale implications of such a project on the region's resources, and in particular to nearby communities we find it necessary to outline pressing concerns regarding both the substance of the proposal and the approval process to date. We look forward to discussing these issues in greater depth with you in person.

The following are some of our most salient objections to the proposal:

1. The Thermal Beach Club is proposed as a private, luxury vacation-home development for affluent non-residents. Riverside County's current housing element notes that there is a severe housing short-fall for impoverished and low income families with no existing shortfall for more affluent households. This project does not address the existing lower income housing needs nor does it conform with Riverside County's policies to promote the inclusion of mixed-income housing in future growth areas of the County.<sup>1</sup> Instead it promises to reinforce existing disparities between affluent and low income residents while continuing a pattern of segregation in the Coachella Valley through class, income, and race.
2. Riverside County did not meaningfully or extensively publicize the proposal and has provided minimal effort to seek resident input. Given the significance of this project and

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<sup>1</sup> Riverside County General Plan: Housing Element, H-150-151

the dire air quality, lack of safe drinking water, and substandard housing conditions faced by current residents in the area, this merits robust community engagement by the county and the project applicant. This is especially critical in light of residents' efforts in the last several years to identify and advance community priorities through efforts such as the Transformative Climate Communities Climate Resilience Action Plan, Thermal and Oasis Mobility Plan, Mecca and North Shore Mobility Plan, AB 617 implementation, Salton Sea Management Program and lately, SB 1000 implementation.

3. In our attempt to conduct a comprehensive review of the proposed project, we have met several obstacles in accessing relevant data and documents, including the Environmental Impact Report (EIR) that accompanied the original Kohl Ranch project proposal and subsequent EIR addenda upon which the current EIR addendum (Addendum 9) relies. Additionally EIR Addendum 9 references a water budget which is not publicly available. There are serious inconsistencies in descriptions of the project, including the discussion of changes to neighborhood L-1, the size of the private clubhouse village, the availability of affordable housing units in the project, and the extent to which the general public will be able to access the clubhouse and surfing lagoon facilities.
4. Thousands of families struggle with unsafe drinking water alongside the increasing threat of a diminishing Salton Sea within a few miles of the proposed project. This reality sits in contrast to the Thermal Beach Club's proposal to increase its already enormous allotment of water to create a "pristine" wave pool in an exclusive setting.
5. The project, described in part as, "a private residential development and clubhouse village...[with a] Crystal Lagoon [that] uses cleaning technology that results in the lagoon remaining clear and blue."<sup>2</sup> is concerning given the extensive environmental justice issues that exist in the Eastern Coachella Valley (ECV). The predominantly Latinx and farmworking community in the ECV struggles with substandard housing conditions, lack of affordable housing options, contaminated drinking water, toxic air pollution, poor public transit, and a myriad of other social, economic, and public health issues.
6. With passage of SB 1000 in 2016, environmental justice communities like the ECV finally have an opportunity to better engage in and inform land use and development decisions. SB 1000 requires cities and counties to incorporate an environmental justice element or related environmental justice goals, policies, and objectives integrated into other elements of the general plan. The environmental justice element, or related environmental justice goals, policies, and objectives must identify objectives and policies

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<sup>2</sup> County of Riverside Planning Department Staff Report, Case Numbers: SP303S03, PPT180037, TTM37269, CZ1900027, page 10.

to reduce the unique or compounded health risks in disadvantaged communities by means that include but are not limited to, the reduction of pollution exposure, including the improvement of air quality, the promotion of public facilities, food access, safe and sanitary homes, and physical activity. It must also identify objectives and policies to promote civic engagement in the public decision making process, and identify objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities. Currently, the Riverside County Planning Department is undergoing a process to develop environmental justice goals, policies and objectives to comply with SB 1000. These goals, policies, and objectives, in turn, will help inform healthy and sustainable development of the region. Accordingly, the Board of Supervisors should delay further consideration of major development proposals like Thermal Beach Club until the adoption of an updated general plan.

We respectfully ask for your participation to schedule an evening community meeting in Thermal for a community discussion regarding the Thermal Beach Club before this proposal is considered for a vote by the Board of Supervisors. We look forward to hearing from you and continuing our collaborative efforts to make the ECV a stronger, healthier, and more equitable place to live.

Sincerely,

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Leadership Counsel for Justice and Accountability

Erika Ramirez-Mayoral  
California Institute for Rural Studies

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