

2018 – 2019 Civil Grand Jury

Western Riverside County Regional Conservation Authority (WR-RCA)

Note: Acronyms used throughout the report can be found in Attachment #1

Background

In 2003, Riverside County developed the Western Riverside County Regional Conservation Authority (WR-RCA), a federally-approved, multispecies habitat conservation plan which would protect the lands occupied by federal and state-recognized threatened and endangered wildlife species (146 species) in western Riverside County. In addition, this speeded up the approval process for transportation (K-Rail) projects. This succeeded a short-term habitat conservation plan, developed in 1990, which protected only one endangered species, the Stephen's Kangaroo Rat (K-Rat).

Prior to the creation of the Western Riverside Multiple Species Habitat Conservation Plan (WR-MSHCP), often referred to as The Plan, transportation, infrastructure and development projects could take five years or more for approval of the necessary permits from the wildlife agencies. Permits are required from the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW), to be in compliance with the Federal Endangered Species Act (ESA).

The Plan was an ambitious project to mitigate the development impacts on 146 plant and animal species by creating a 500,000 acre reserve system, while streamlining the approval process for transportation and infrastructure projects. Essentially, the development permits could be moved forward provided conservation land was acquired to replace the parcels being disturbed. This comprehensive program could balance the preservation of open space for species protection while enabling the development of transportation infrastructure to continue in this rapidly growing county. In 2004, the Western Riverside County Regional Conservation Authority (RCA) was established as a Joint Powers Authority (JPA) of the County and participating cities, to administer The Plan. The Plan is a binding contract between the RCA, the County, the cities and the federal and state wildlife agencies that administer the ESA.

The cities in Western Riverside County, a group of 14 cities which was subsequently increased to 18, formed a JPA, in association with the County of Riverside to establish a management agency. The RCA was created to administer land acquisition and habitat protection. The USFWS issued a 75-

year permit to the RCA to regulate the disturbance of any endangered or threatened species in the habitat area.

The Plan encompasses about 40% of the total land area in Western Riverside County. Of the 500,000 acres covered by The Plan, approximately 347,000 acres were already in public trust, leaving 153,000 acres to be acquired. The federal and state wildlife agencies agreed that together they would acquire 56,000 of those acres. Local sources, through willing sellers and donations, would provide 97,000 acres. Criteria cells were demarcated within the conservation area. The Criteria Cells, blocks of approximately 160 acres, were identified as the most significant habitat land for RCA to conserve. The land acquisition requirements necessitated specific analysis of each land acquisition and development proposal within a Criteria Cell. The Plan requires they aggregate land to assemble linkages between these “islands” of conservation lands. The conservation land must be acquired by RCA through a purchase from a willing seller or by donation, not through eminent domain. Land could also be acquired through the Habitat Evaluation and Acquisition Negotiation Strategy (HANS) process in which a developer reviews with the RCA whether a portion of the land should be included in the reserve.

Operation of The Plan under its specific guidelines allowed the federal and state wildlife agencies to issue a 75-year permit to RCA which would enable the County and participating cities to accelerate approval of transportation, commercial and residential projects outside of the conservation reserve, as long as the conservation reserve was maintained.

One of the goals of The Plan was to acquire the 500,000 acre habitat reserve within a 25-year period, and to develop a reserve endowment fund. This would finance the future management of the lands and monitoring of the endangered species to the end of the 75-year wildlife agency permit. Changes to the time period for land acquisition would require approval of all permittee cities and the County, as well as the wildlife agencies. It would extend the obligation of the cities to collect millions of dollars in additional fees during that extended time. An extension of the 25-year land acquisition period would then require an amendment to The Plan. The approval process and accompanying environmental reviews would likely be arduous, time-consuming and possibly contentious.

The Plan was to be funded through the collection of mitigation fees, levied on new residential and industrial development projects. County and non-profit projects were also subject to the fees. These mitigation fees would only be used to purchase land. Initially, these fees would be approximately \$1,600 per residence, and about \$5,000 per acre for business or industrial property. Additional unrestricted funds would be obtained from landfill tipping fees, transportation taxes, grants and payments from other Participating Special Entities (PSEs), such as Riverside County Transportation Commission, Flood Control and other regulated utility districts.

A Nexus study to identify the connection between the JPA and the taxes/fees collected was contracted to an outside party at the establishment of The Plan in 2003. The estimated total cost of land acquisition to complete the requirements of The Plan would be about \$876,000,000. Other appropriate management costs of \$30,000,000 would bring the total cost to implement The Plan to about \$906,000,000. It was expected that the RCA would provide a pool of \$100,000,000 by the end of the 25 year land acquisition period, and that \$70,000,000 of that would be set aside into an endowment fund. The income from this endowment fund was anticipated to yield about \$3,500,000 annually, which would be used for adaptive management activities of the habitat preserve for the remaining 50 years of The Plan.

The Plan was successful in facilitating the rapid permitting of the early transportation projects. However, a 2008 review was conducted by the Rand Corporation, a private consulting firm, after the fifth year of The Plan. It suggested that while The Plan eased the permitting process for transportation projects in the conservation areas, analysis suggested that higher than anticipated land acquisition costs would require a search for new funding sources to meet The Plan's goals. The initial estimation was that 153,000 acres could be acquired at about \$4,000 per acre. However, by 2008 the costs were significantly higher due to a rise in land values and the need to purchase expensive land in Criteria Cells to maintain the necessary habitat linkages.

Structure

According to The Plan's Implementing Agreement, the RCA is directed by a 23 member Board of elected officials comprised of the 18 city members in Western Riverside County and the five County Supervisors. (MSHCP Plan, Volume 1, Section 6.6.2.B). The RCA Board of Directors provide primary policy direction for the implementation of The Plan. (MSHCP Plan, Volume 1, Section 6.6.2.C). The seven member Executive Board serves as the managing agent. The Executive Board meets about two weeks prior to the full Board's monthly meeting. In addition to the Executive Board, the Implementing Agreement also requires a Finance Coordinating Committee, a Reserve Management Oversight Committee and a Stakeholders Committee. The Board has limited staff, who are contracted County employees. This staff is responsible for processing the land acquisitions for the reserve.

The RCA contracts with outside agencies for all species monitoring and land management activities. Santa Ana Watershed Association (SAWA) provides contract services for monitoring the habitat land areas and the protected species. They provide periodic counts and evaluations of specific plant and animal species. The Riverside County Parks and Open Spaces Department is contracted by the RCA to provide park rangers to manage the reserve lands, including posting, and clearing the land of rubbish, toxic materials and invasive plants. RCA outsources many other services from outside vendors, including Plan Implementation and training for developers, Legal Services,

Real Property Services, Federal and State Lobbying, Nexus Study Update, Public Relations and other special consultants.

The RCA website provides information about the RCA and access to a wide variety of documents including The Plan description, the Implementing Agreement, Annual Reports, Meeting Agendas and Minutes, maps and other related documents. These documents are helpful to the member cities and developers.

Operations

The goals of The Plan are to acquire, within 25 years, the obligatory 153,000 acres of conservation land and to develop an endowment fund sufficient to maintain the conservation habitat in perpetuity. The specific goal, as stated in Section 5.2 of The Plan, is “to establish and maintain a self-sustaining MSHCP Conservation area that focuses on conserving habitats and species ...” This requires a necessary balancing of the land acquisition during an unstable and unpredictable economy of development activity and fluctuating land prices. When the pace of new development is slow, the limited mitigation fees collected reduce the funding available for acquisition of conservation acreage. When development is booming, land prices tend to inflate. Other issues, including past and potential lawsuits and the availability of developable land for purchase, can interfere with the predictable growth trajectory of the required protected lands. In 2011, RCA attempted a land acquisition from *Anheuser – Busch, LLC*, which resulted in litigation and settlement that cost RCA \$46,000,000. This restricted available land purchase funds and escalated the land purchase costs of neighboring properties. It has been more difficult than anticipated to keep a steady pace of land acquisitions, if the reserve assembly is to be completed within the 25-year period.

Land Acquisition Acreage

At the initiation of The Plan, County and government agencies dedicated conservation land which they had accumulated while The Plan was being assembled and approved. When it was started in 2004, the County transferred previously acquired acres (16,939) into the reserve. RCA Annual Reports of more recent years show fewer acres of land are being acquired than had been anticipated. In 2019, the total Local Acquisition of land is only about 61,000 acres of the expected local allocation of 97,000 acres.

The Plan had anticipated that the land acquisition (purchases and donations) process would yield about 2,800 acres per year, but actually much less. The lands acquired, through local developer review and HANS entitlement process are only a small portion (1,337 acres) of the proposed number of acres expected at this time. The original expectation, that the RCA would acquire 2,050 acres per year through the HANS process, was too aggressive. Also, the Federal and State agencies have been slow to provide funds towards their goal to acquire 56,000 acres of land for The Plan.

Land Acquisition – Funding

Total Development Fee Revenue was high in the first few years of The Plan, exceeding \$33,000,000 in 2005. However, during the general recession, the mitigation funds collected were approximately \$10,000,000 per year or less. In the early years of the operation of The Plan, significant funds were available from Measure A (gas tax), TUMF funds (County transportation fee), Flood Control, landfill tipping fees and other infrastructure sources. However, during the general recession, some of these funds were either eliminated or capped. In recent years, the amounts contributed through infrastructure and tipping fees were about one-half or less of the amount collected yearly as mitigation fees. The total land acquisition costs to date are about \$485,000,000.

Land Monitoring and Management

The contract with SAWA for monitoring of the habitat and species is about \$1,100,000 – \$1,400,000 annually. The contract with the Riverside County Parks and Open Spaces Department for park rangers and management of the MSHCP habitat lands is about \$1,500,000 annually for the past several years. The administrative costs, of RCA and all other external contracts range from \$3,000,000 – \$4,000,000 annually. The annual costs of all management, monitoring and administrative activities are about \$5,000,000 – \$6,000,000 per year.

Annual Report

The RCA staff is required to publish an Annual Report, which describes the current activities of the RCA. The Annual Reports cite the number of acres of land acquired or donated in that year and the total number of acres incorporated into the reserve since the authorization of The Plan. The reports provide extensive detail on the property management activity and the species monitoring activity tasks which are performed by outside contractors. The Annual Report also identifies the number of acres of land that are designated for future conservation, but it is unknown as to when these lands will be donated into the reserve.

Biological Assessment

The endangered plant and animal species living in the habitat are evaluated for presence and distribution, every three to eight years. However, some species are monitored annually (e.g. Quino checkerspot butterfly). The most recent monitoring actions, in 2017, detected some presence of 97 out of the 146 species. Since June 2004, the monitoring agency has detected some presence of 141 out of the 146 endangered or threatened species. This reporting is only detection of a species, and does not indicate whether a species population is growing, depleted or has moved from its original area. Although The Plan was developed to protect the habitat of 146 species, there was never a true census of the individual species.

Future Directions

The Plan has provided great value to the County in terms of acceleration of transportation infrastructure (K-Rail) development and preservation of the habitat of endangered and threatened species. The establishment of a self-supporting conservation plan enabled the governing agencies of western Riverside County to obtain a 75-year permit from the State and Federal wildlife agencies which administer the Endangered Species Act. This arrangement enables the County and cities to significantly reduce the time required to obtain development permits.

In 2003, when The Plan was developed, the founding parties made reasonable estimates as to the cost of land acquisition and the administration of The Plan. The 2008 Rand report identified shortfalls in the funding and suggested several alternate mechanisms to increase revenue, including raising the mitigation fees, and implementing a variety of taxes. Suggested examples of revenue sources are an Ad Valorem Property Tax, Parcel Tax, Special Property Assessments, Mello-Roos Tax, Document Transfer Tax, Local Development Mitigation Fee, Highway Tolls, Vehicle License Fee, Vehicle Registration Fee and Sales Tax. Tax revenue would be applied to the entire County population base, which could be politically unpopular.

According to budget contracts issued by the RCA in 2011 and 2012, another Nexus review of potential income sources was conducted. However, no report was released for review by the full Board. During the economic uncertainty of 2008-2014, there was concern that potential proposals for an increase of the mitigation fees would not be acceptable. In 2017, an updated analysis was contracted to prepare a new Nexus study and generate proposals to increase revenue. This report was to be completed by June 2018. This analysis is still with the RCA, but has not yet been released to the full Board as of May 2019.

K-Street Alternatives

Annual RCA contracts amounting to over \$200,000 with Washington, D.C. and Sacramento lobbyists have produced several potential legislative alternatives for obtaining more funds to complete the reserve land acquisition. Proposals included removal of limiting restrictions on agency grants, development of access to other grant funding pools, and application to untapped potential loan sources. Even with removal of grant funding caps, strong national and state competition limits the likelihood of success in obtaining these grant funds.

A legislative proposal to incorporate some MSHCP lands into a new National Wildlife Refuge could open the way to apply for grants from a larger pool of funds. Unfortunately, this proposal did not advance sufficiently before the end of the last Congressional session. This proposal has been reintroduced to the next Congress.

Other legislative proposals include identification of federal programs, such as Water Infrastructure Financing and Innovation Act (WIFIA), which supports loans for purchase of habitat lands. RCA would still need to find funds to repay such loans. There are also legislative proposals to change the requirements of the Endangered Species Act. Some of these alternatives have been pursued by the contracted Washington, D.C. K-street lobbyists for several years, but have yet to come to fruition.

METHODOLOGY

Public Meetings Attended by Civil Grand Jury Members

Western Riverside County Regional Conservation Authority (RCA):

1. Attended ten monthly meetings of the RCA Board (September 2018 – June 2019)
2. Attended six monthly meetings of the RCA Executive Board (December 2018 – May 2019)
3. Attended one Joint Project Review Meeting at RCA (November 15, 2018)

Interviews

1. Individual in-person interviews with nine current members of RCA Board and RCA Executive Board and a telephone interview with one RCA Board Member
2. Interviews with contracted agencies:
 - a. Santa Ana Watershed Association (SAWA) – Executive Director
 - b. Riverside County Parks and Open Spaces – Natural Resources Manager
 - c. Riverside County Economic Development Agency – Real Property Agent
3. Other individual interviews:
 - a. Western Riverside County Regional Conservation Authority - four staff members
 - b. California Department of Fish and Wildlife - Senior Biologist
 - c. Riverside County Transportation Land Management Agency - Director
 - d. Riverside County Habitat Conservation Agency - Director of Administration

Visits

1. Coachella Valley Conservation Commission – meeting (January 10, 2019) and tour of the reserve

RCA Reports Reviewed

1. Western Riverside County Multi-Species Habitat Conservation Plan
 - a. Vol. 1 The Plan
 - b. Vol. 2 The MSHCP Reference Document
 - c. Vol. 3 Implementing Agreement
 - d. Vol. 4 Final EIR/EIS (Environmental Impact Report/Environmental Impact Statement)
 - e. Vol. 5 Final Responses to Comments
 - f. Nexus Report (2003); prepared by the consultant firm Taussig & Associates
2. Western Riverside County Regional Conservation Authority (RCA) documents reviewed:
 - a. RCA Bylaws
 - b. RCA Board Meeting Minutes 2010 to 2019
 - c. RCA Executive Board Meeting Minutes 2010 to 2019
 - d. Western Riverside County Regional Conservation Authority – Basic Financial Statements with Independent Auditor’s Report for the Year ended June 30, 2018
 - e. Western Riverside County Regional Conservation Authority – Multiple-Species Habitat Conservation Plan – Annual Reports 2016 and 2017
 - f. Consultants Quarterly Reports – Reviewed various reports during the period 2012 to 2018:
 - 1) Hogan Lovells – “K Street” lobbying firm
 - 2) Kadish – “K Street” lobbying firm
 - 3) Riverside County Parks and Open Spaces – habitat maintenance
 - 4) Santa Ana Watershed Association(SAWA) – habitat monitoring
 - 5) Dudek – Plan interpretation services
 - g. MSHCP Board Resolution No. 2017-006 – Support for the establishment of a National Wildlife Refuge within the boundaries of the WR-MSHCP
 - h. Douglas P. Wheeler, Hogan Lovells Quarterly Report (December 2018) –Comments on legislative action for National Wildlife Refuge
 - i. RCA Job Descriptions
 - j. RCA Index of Policies, Procedures, Ordinances and Resolutions (2004 to present)
 - k. RCA Resolution 08-006 Endowment Policy
 - l. RCA Contracts Reviewed:
 - 1) Hogan Lovells – “K Street” lobbying firm
 - 2) Kadish – “K Street” lobbying firm
 - 3) Riverside County Parks and Open Spaces – habitat management
 - 4) Santa Ana Watershed Association (SAWA) – habitat monitoring

- 5) Dudek – Plan interpretation services
- 6) Tom Mullen – lobbyist-advisor
- 7) OPR Communications – public awareness
- 8) Economic & Planning Systems, Inc. – financial analysis
 - a. 2012 Contract; signature date to February 6, 2013; in the amount of \$200,150
 - b. 2017 Contract; two year contract 2017-2018; in the amount of \$170,000
- 9) Blink IT Solutions – IT services

Other Reports Reviewed

1. Dixon, Lloyd, Paul Sorensen, Martin Wachs, et al. “Balancing Environment and Development: Costs, Revenues, and Benefits of the Western Riverside County Multiple Species Habitat Conservation Plan” Report of Rand Corporation: Transportation, Space, and Technology (2008)
2. Lederman, Jaimee and Martin Wachs “Transportation and Habitat Conservation Plans: Improving Planning and Project Delivery While Preserving Endangered Species” (April 2014) University of California Transportation Center UCTC-FR-2014-04
3. Wheeler, Douglas P. “Gray and Green: Planning for Advanced Mitigation” in 'IAIA15 Conference Proceedings' Impact Assessment in the Digital Era 35th Annual Conference of the International Association for Impact Assessment 20 - 23 April 2015 | Firenze Fiera Congress & Exhibition Center | Florence | Italy | www.iaia.org
4. Landry, Charles “Habitat Conservation Plans – Landscape Level Conservation in a Rapidly Developing Rural-Urban Interface” presentation at Large Landscape Conservation Conference, October 24, 2014
5. Ouellette, Michelle and Charles Landry “The Western Riverside County Multiple Species Habitat Conservation Plan: Looking Forward After Ten Years” in Natural Resources Environment 29(3): 1-4 (2015)
6. League of California Cities The Peoples’ Business, A Guide to the California Public Records Act (2017)
7. Riverside County Transportation Commission (RCTC) and Regional Conservation Authority (RCA) Special Meeting/Workshop, August 28, 2017 - Minutes
8. California State Legislature “Government Working Together, A Citizens Guide to Joint Power Agreements” (2007)
9. Coachella Valley Conservation Commission – Annual Report 2017
10. Agreement between Coachella Valley Conservation Commission and Coachella Valley Association of Governments for the Administration of the Coachella Valley Multiple Species Habitat Conservation Plan, Amendment #2 (November 8, 2018)

FINDINGS

Inadequate Board Oversight

1. RCA Board Members often have a limited understanding of the very complex requirements and obligations of this conservation agency. They need more measurable information on the long term trends of the RCA. Many elected Board Members do not remain on this Board for more than a few years, and so institutional memory of the Board is often limited. Only the Executive Board appears to make decisions about setting the agenda.

Board Lack of Awareness of Financial Pitfalls

2. The RCA Board has not acknowledged its inability to meet the current time table for acquisition of habitat conservation lands. The current rate of land acquisition has slowed to the point where it is unlikely to expect that it will meet The Plan's goal of completion of habitat land reserve within the remaining ten years of the 25 year plan.

Over \$1 Billion Dollars Will Be Needed Within the Next Ten Years!

3. Even with the RCA's recent estimate of land acquisition costs at \$13,000 per acre, the necessary land acquisition costs to complete The Plan are expected to be a staggering \$1.0 to \$1.5 billion dollars. This represents a significant financial risk to the County.

Endowment Fund is Underfunded

4. The Plan calls for an endowment fund of \$70,000,000 to support future monitoring and maintenance of habitat lands. At this time, the fund is severely underfunded currently at about \$5,800,000. The failure to build this reserve fund, the interest income of which would fund habitat maintenance activities in perpetuity, could obligate the participating cities to carry these costs after completion of the land acquisition requirement.

Efficiencies of Outside Contractors vs. In-House Staff

5. RCA outsources many costly contracts to outside parties for legal services, plan implementation, real property services, and other professional services. These costs drain the limited general funds, used to build up the endowment and other services. RCA contracts with an outside company to act as a middle-man for projects that are negotiated between developers and RCA staff. The outside company agents explain the MSHCP process, provide interpretation and deliver a completed packet of documents for the RCA joint project reviews.

Insufficient Financial Commitment for Maintenance & Security of Habitat Reserve

6. The Plan Land Management budget does not provide sufficient park rangers for increased land patrol and maintenance responsibilities of the expanding habitat reserve. The maintenance and security of the current accumulated 400,000 acres of conservation land is suffering from damages caused by fires and floods, as well as off-highway vehicles

(OHV), and homeless encampments. This damage will only increase in the future.

Legislative Solutions for Funding Are Far From Certain

7. RCA continues to spend over \$200,000 annually, of its own limited, local general funds for two K-Street lobbyists. Their proposals repeatedly seek funding resources through legislative alternatives. These approaches have indeterminate and un-measurable outcomes.

Lack of Public Understanding

8. RCA is an obscure agency. The taxpaying, voting public is not aware of its valuable contributions to the conservation of the environment or to the development of public infrastructure in the County.

More Useful Annual Reports

9. The information in the Annual Reports meet the minimal requirement set out in The Plan, but do not discuss financial issues of concern or proposed remedies and actions. They do not provide comment on whether the income receipts and the rate of the land acquisition are sufficient for the RCA to meet its goal of acquiring sufficient habitat lands to assemble the reserve within 25 years.

Consolidation of Duplicate Bureaucracy

10. RCA is a free-standing JPA. The other two habitat conservation agencies in the County, HCA and CVCC, are not free-standing and are subject to a higher level of public visibility along with managerial and financial oversight provided by the existing multi-city management structure.

Recommendations

Western Riverside Regional Conservation Authority Riverside County Board of Supervisors

Inadequate Board Oversight

1. The RCA Executive Board needs to ensure that all Board Members are adequately trained in the mission and operational mechanisms of The Plan. Board Members must fully understand their essential role as primary policy makers of the RCA. The Executive Board should develop timely evaluations of the performance of The Plan, and report on the progress of RCA in meeting its goals to the Board. They need to ensure that information about the long-term trends of this agency is understood by all Board Members.

Board Lack of Awareness of Financial Pitfalls

2. The Executive Board needs to direct the RCA staff to provide members of the Board with actionable information about the long term trends in income and land reserve. This will illuminate the concern about progress towards the land acquisition goal of The Plan.

Over \$1 Billion Dollars Will Be Needed Within the Next Ten Years!

3. The Executive Board urgently needs to work with the RCA staff to identify all options anticipated in the 2017 Nexus report regarding the revision of the scheduled mitigation fees. In addition to other funding mechanisms, including loans and alliances with other federal agencies, the Board should explore other options to meet the overwhelming costs of future land acquisition. The Executive Board should make recommendations, provide justification for proposed mitigation rate increases and present other tax options to the entire Board for review and confirmation. Tax options are described in the 2008 Rand report. The Board should convene the Funding Coordination Committee, which is described in The Plan, Volume 1, Section 6.6.2.D, and meet with the wildlife agencies to address these common funding concerns. All agencies, including the wildlife agencies, need to improve collections to meet their land acquisition goals.

Endowment Fund is Underfunded

4. The Executive Board should require the RCA staff to propose options for building the endowment fund to the level of \$70,000,000 to support habitat monitoring and maintenance for the remaining 50 years of The Plan. The RCA management staff needs to clearly report on the level of the underfunded endowment reserves for future protection of the MSHCP lands in conjunction with the quarterly budget reports.

While it is possible to delay the accumulation of an endowment fund for future habitat monitoring and maintenance, doing so would reduce the time needed to reach the land acquisition goal. It would be a risky option since recent fee collections have been so low. The entire Board needs to be aware of the status of resources needed to complete the acquisition of the land reserve and the endowment to support the maintenance of the future expansive land reserve. They should review proposals to seek nonprofit funding to build up the endowment.

Efficiencies of Outside Contractors vs. In-House Staff

5. RCA management staff should review the use of internal staffing versus the use of many costly outside contractors. More biological assessment and land acquisition activities could be brought in-house. Trained in-house staff could handle more basic biological assessment and land acquisition duties. Many fees paid to outside contractors could be reduced by efficient use of internal staffing.

Insufficient Financial Commitment for Maintenance & Security of Habitat Reserve

6. Shift resources to add more contract land management park rangers. Coordinate with County Sheriff and Code Enforcement Departments to assist park rangers in controlling on-going damage to the habitat reserve from trespassers, mountain bikes and excess motor sport vehicles, as well as homeless encampments. Seek available grants from California Off-Highway Motor Vehicle Registration for management of OHV recreation and security. Use funds for posting signage and limiting vehicle access into the preserve and for repairs on the expanded acreage of protected lands.

Legislative Solutions for Funding Are Far From Certain

7. Review the effectiveness and over-reliance on K-Street lobbyists as a source of needed future fundings. Consider integration of RCA habitat lobbying with other County lobbying efforts.

Lack of Public Understanding

8. RCA should improve outreach efforts to the general taxpaying, voting public. Provide public education about the RCA's conservation mission and build a public constituency of those who may be asked to approve future funding mechanisms to support its goals. Create public understanding of the importance of this conservation plan in reducing delays in the development of public infrastructure projects and the value of protecting the habitat for endangered species.

More Useful Annual Reports

9. The Annual Report should serve as a benchmark to be used for evaluating compliance with The Plan requirements and goals. The report should provide graphic description of the RCA's progress towards The Plan conservation goals. It should identify significant issues in The Plan implementation and proposed remedies for concerns which may delay implementation. Copies of the Annual Report should be made available to the public and presented at an open workshop where they may comment.

Consolidation of Duplicate Bureaucracy

10. The consolidation of RCA within an existing multi-city management structure would provide:
 - Operational improvement
 - Reduction of duplication of bureaucracy
 - Cost reduction
 - Increased public visibility
 - Increased financial oversight

WRCOG could serve this function, as Coachella Valley Association of Governments (CVAG) does for Coachella Valley Conservation Commission (CVCC).

Acronyms

CDFW – California Department of Fish and Wildlife

CVAG – Coachella Valley Association of Governments

CVCC – Coachella Valley Conservation Commission

ESA – Endangered Species Act of 1973 16 U.S.C § 1531 et. seq.

HCA – Western Riverside Habitat Conservation Agency

HANS – Habitat Evaluation and Acquisition Negotiation Strategy

JPA – Joint Powers Authority

K Rat – Kangaroo rats are small rodents of genus *Dipodomys* that are native to western North America. The common name derives from their bipedal form. They hop in a manner similar to the much larger kangaroo, but developed this mode of locomotion independently. **Stephens' kangaroo rat** (*Dipodomys stephensi*) is endemic to the Southern California region of the United States, primarily in western Riverside County. The natural habitat of Stephens' kangaroo rat is sparsely vegetated temperate grassland. This habitat has been destroyed or modified for agriculture, therefore the Stephens' kangaroo rat is listed as an endangered species by the U.S. Fish and Wildlife Service.

K Rail – A Jersey barrier is also known in the western United States as **K-rail**, a term borrowed from the California Department of Transportation specification for temporary concrete traffic barriers, or colloquially as a Jersey bump.

K Street – A major thoroughfare in the United States capital of Washington, D.C. known as a center for numerous lobbyists and advocacy groups. In political discourse, "K Street" has become a metonym for Washington's lobbying industry since many lobbying firms were traditionally located in the section in Northwest Washington.

MSHCP – Multiple Species Habitat Conservation Plan; often referred to as The Plan

OHV – Off Highway Vehicle

RCA – Abbreviated term for WR-RCA

City Members are: Banning, Beaumont, Calimesa, Canyon Lake, Corona, Eastvale, Hemet, Jurupa Valley, Lake Elsinore, Menifee, Moreno Valley, Murrieta, Norco, Perris, Riverside, San Jacinto, Temecula, Wildomar as well as the unincorporated areas of the County of Riverside

SAWA – Santa Ana Watershed Association

The Plan – the short name used for MSHCP

TUMF – Transportation Uniform Mitigation Fee

USFWS – United States Fish and Wildlife Service

WIFIA – Water Infrastructure Finance and Innovation Act

WRCOG – Western Riverside Council of Governments

WR-RCA – Western Riverside Regional Conservation Authority

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