SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA 916B

FROM: TLMA – Planning Department

SUBMITTAL DATE:
March 9, 2009

SUBJECT: GENERAL PLAN AMENDMENT NO. 986 – Foundation-Regular – Applicant: Ronald Smith – Engineer/Representative: VSL Engineering - Third Supervisorial District - Rancho California Zoning Area - Southwest Area Plan: Rural: Rural Residential (RUR-RR) (5 Acre Minimum) – Location: Northerly of Anza Road, easterly of Rio Linda Road, and southerly of Santa Rita Road - 18.67 Gross Acres - Zoning: Residential Agricultural - 20 Acre Minimum (R-A-20) - **REQUEST:** This General Plan Amendment proposes to amend the General Plan Foundation Component of the subject site from Rural to Community Development and to amend the General Plan Land Use designation from Rural Residential (RR) (5 Acre Minimum) to Medium Density Residential (MDR) (2-5 DU/AC) - APN: 966-380-010

RECOMMENDED MOTION:

The Planning Director recommends that the Board of Supervisors adopt an order initiating proceedings for the above referenced general plan amendment based on the attached report. The initiation of proceedings by the Board of Supervisors for the amendment of the General Plan, or any element thereof, shall not imply any such amendment will be approved.

BACKGROUND:

The initiation of proceedings for any General Plan Amendment (GPA) requires the adoption of an order by the Board of Supervisors. The Planning Director is required to prepare a report and recommendation on every GPA application and submit it to the Board of Supervisors. Prior to the submittal to the Board, comments on the application are requested from the Planning Commission, and the Planning Commission comments are included in the report to the Board. The Board will either approve or disapprove the initiation of proceedings for the GPA requested in the application. The consideration of the initiation of proceedings by the Planning Commission and the Board of Supervisors pursuant to this application does not require a noticed public

Ron Goldman
Planning Director

RG:TH

REVIEWED BY EXECUTIVE OFFICE
DATE 3/18/09
Tina Grande
Departmental Concurrence

☒ Policy ☒ Policy
☐ Consent ☐ Consent
Dep't Recomm.: Per Exec. Ofc.:

Prev. Agn. Ref. | **District:** Third | **Agenda Number:** 15.3

Form 11p (Rev 03/28/06)

hearing. However, the applicant was notified by mail of the time, date and place when the Planning Commission and the Board of Supervisors would consider this GPA initiation request.

If the Board of Supervisors adopts an order initiating proceedings pursuant to this application, the proposed amendment will thereafter be processed, heard and decided in accordance with all the procedures applicable to GPA applications, including noticed public hearings before the Planning Commission and Board of Supervisors. The adoption of an order initiating proceedings does not imply that any amendment will be approved. If the Board of Supervisors declines to adopt an order initiating proceedings, no further proceedings on this application will occur.

The Board of Supervisors established the procedures for initiation of GPA applications with the adoption of Ordinance No. 348.4573 (effective May 8, 2008), which amended Article II of that ordinance.

Y:\AdvancedPlanning\2008FOUNDATIONCOMPONENTREVIEW\GPACases\GPA986\GPA986BOSPackage\GPA986Form 11a.doc

Agenda Item No.: 6.9
Area Plan: Southwest
Zoning District: Rancho California Area
Supervisorial District: Third
Project Planner: Tamara Harrison
Planning Commission: February 4, 2009

General Plan Amendment No. 986
Applicant: Ronald L. Smith
Engineer/Representative: VSL Engineering

COUNTY OF RIVERSIDE PLANNING DIRECTOR'S REPORT AND RECOMMENDATIONS

RECOMMENDATIONS:

The Planning Director recommends that the Board of Supervisors adopt an order initiating proceedings for General Plan Amendment No. 986 from Rural: Rural Residential to Community Development: Medium Density Residential and the Planning Commission made the comments below. The Planning Director continues to recommend initiation of the General Plan Amendment. For additional information regarding this case, see the attached Planning Department Staff Report(s).

PLANNING COMMISSION COMMENTS TO THE PLANNING DIRECTOR:

The following comment(s) were provided by the Planning Commission to the Planning Director:

Commissioner John Roth: Commissioner Roth commented that Estate Density Residential may be more appropriate than Medium Density Residential.

Commissioner John Snell: No Comments

Commissioner John Petty: Commissioner Petty recommended initiation from Rural: Rural Residential and Rural: Rural Mountainous to Community Development: Medium Density Residential with some hesitation.

Commissioner Jim Porras: No Comments

Commissioner Jan Zuppardo: No Comments

Agenda Item No.: 6.9
Area Plan: Southwest
Zoning District: Rancho California Area
Supervisorial District: Third District
Project Planner: Tamara Harrison
Planning Commission: February 4, 2009

General Plan Amendment No. 986
Applicant: Ronald L. Smith
Engineer/Representative: VSL Engineering

COUNTY OF RIVERSIDE PLANNING DEPARTMENT
STAFF REPORT

PROJECT DESCRIPTION AND LOCATION:

The applicant proposes to amend the General Plan Foundation Component and Land Use designations from "Rural: Rural Residential" (RUR: RR) (5 acre min.) to "Community Development: Medium Density Residential" (CD: MDR) (2-5 du/ac) for an approximately 18.67-acre parcel. The project is located northerly of Anza Road, easterly of Rio Linda Road and south westerly of Santa Rita Road.

POTENTIAL ISSUES OF CONCERN:

The proposed site is located in the "Rancho California" community within the Southwest Area Plan. The site is directly adjacent to parcels that carry the Rural: Rural Residential designation to the north and the east. The Community Development: Medium Density Residential designation can be found to the south of the site directly across Anza Road and to the west of the site directly across Rio Linda Road. Further to the north of the site, across Monte Verde Road is Specific Plan No. 313, "Morgan Hill." The approved densities within the SP are similar to those allowed under the Medium Density Residential land use designation. The proposal would continue the pattern of Medium Density Residential in the community and would be consistent with the overall vision for the area.

A number of residential tracts with densities similar to those densities under the proposal have been approved since the adoption of the General Plan in 2003 or are in process in the vicinity of the site. Tract Map (TR) 32813 which lies to the northwest of the subject site was approved for 59 single-family residential lots in 2007. Likewise, TR32227 was approved for 104 single-family residential lots in 2007 which lies south of the subject site across Anza Road. TR32778 lies to the south of the proposed site and is currently under review with the Planning Department, proposing 92 single-family residential lots. TR32988 is also currently under review and proposes 37 single-family residential lots to the east of the subject site. The approval and the review of these tracts along with the development of the "Morgan Hill" specific plan has presented a substantial amount of change in the area since the adoption of the General Plan that substantiates the request.

A County fault line transects the subject site which could potentially create fault hazards; however, as part of the review for TR32227 (Geologic Report No. 1484) no evidence of faulting was found in the area and therefore mitigation measures weren't necessary with TR32227. Development of the subject site would address faulting issues at the project level as well.

Recommendation:

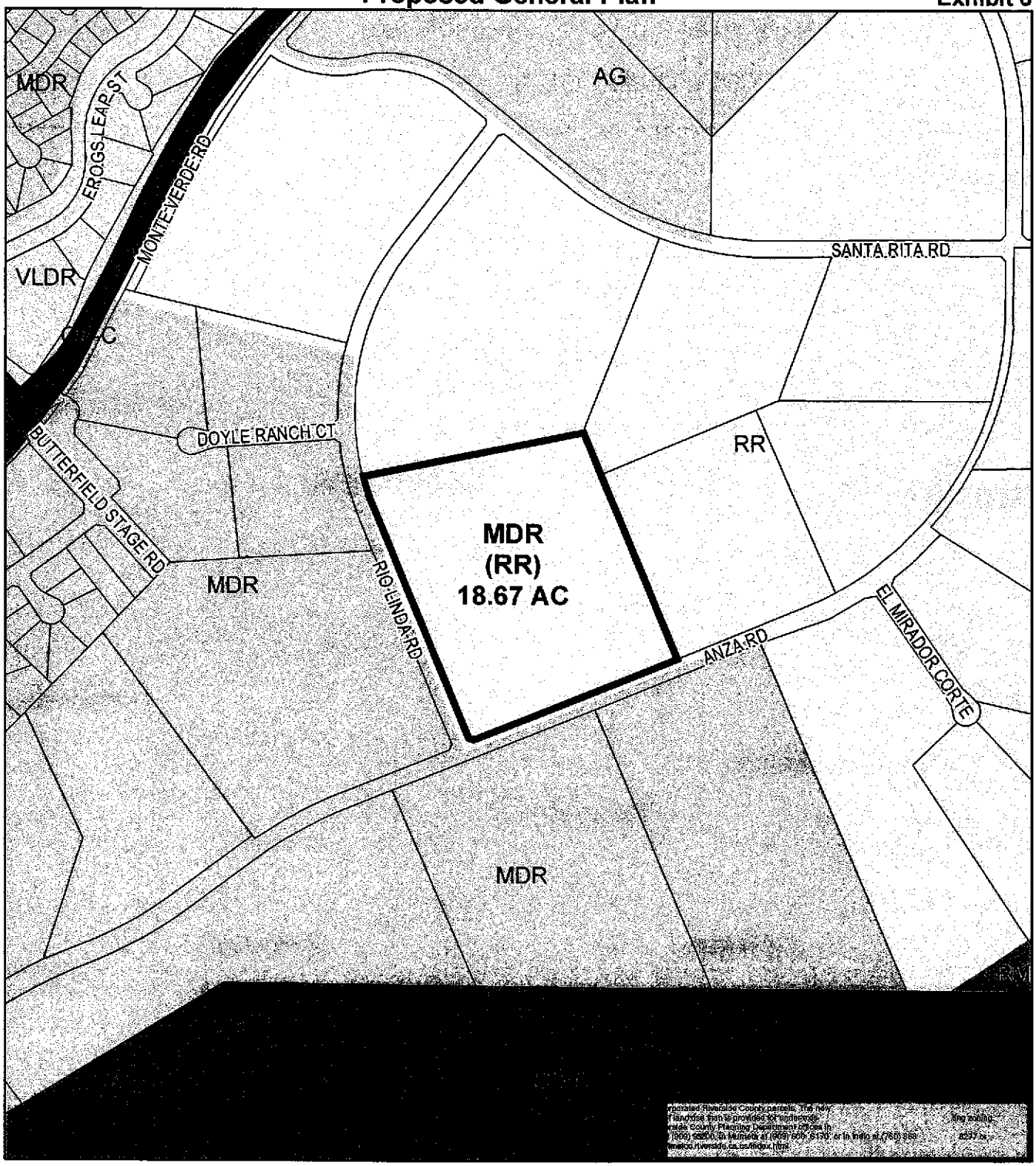
Comment that adoption of an order initiating proceedings for General Plan Amendment No. 986 from Rural: Rural Residential to Community Development: Medium Density Residential **would be appropriate.** The adoption of such an order does not imply that the proposed GPA will be approved.

Supervisor Stone
District 3
Date Drawn: 3/04/08

GPA00986

Proposed General Plan

Planner: Amy Aldana
Date: 3/10/08
Exhibit 6



RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
Area: Rancho California
Township/Range: T8SR2W
Section: 23

0 300 600 1,200 1,800
Feet

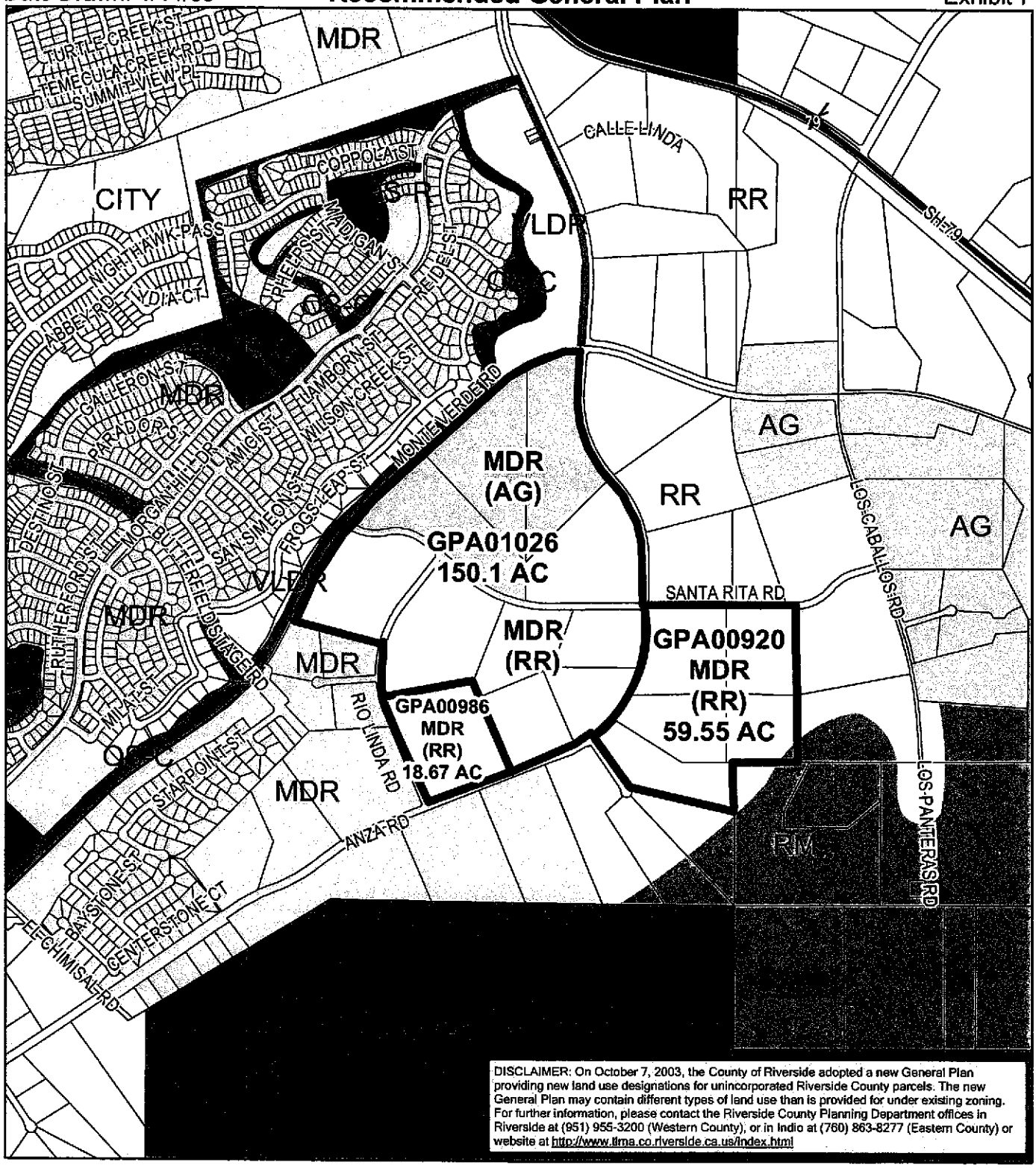
Assessors
Bk. Pg. 966-38
Thomas
Bros. Pg. 980 A3

Supervisor Stone
District 3
Date Drawn: 1/14/09

GPA00920 GPA00986 GPA01026

Recommended General Plan

Planner: Amy Aldana
Date: 2/4/09
Exhibit 7



DISCLAIMER: On October 7, 2003, the County of Riverside adopted a new General Plan providing new land use designations for unincorporated Riverside County parcels. The new General Plan may contain different types of land use than is provided for under existing zoning. For further information, please contact the Riverside County Planning Department offices in Riverside at (951) 955-3200 (Western County), or in Indio at (760) 863-8277 (Eastern County) or website at http://www.tlma.co.riverside.ca.us/index.html

RIVERSIDE COUNTY PLANNING DEPARTMENT

Area: Rancho California
Township/Range: T8SR2W
Section : 14,23,24

Assessors Bk.Pg. 966-38
Thomas Bros. Pg. 980 A3

0 950 1,900 3,800 5,700
Feet

Supervisor Stone
District 3
Date Drawn: 3/04/08

GPA00986

DEVELOPMENT OPPORTUNITY

Planner: Amy Aldana
Date: 3/10/08
Exhibit Overview

RIVERSIDE COUNTY PLANNING DEPARTMENT

Area Plan: Rancho California
Township/Range: T8SR2W
Section: 23

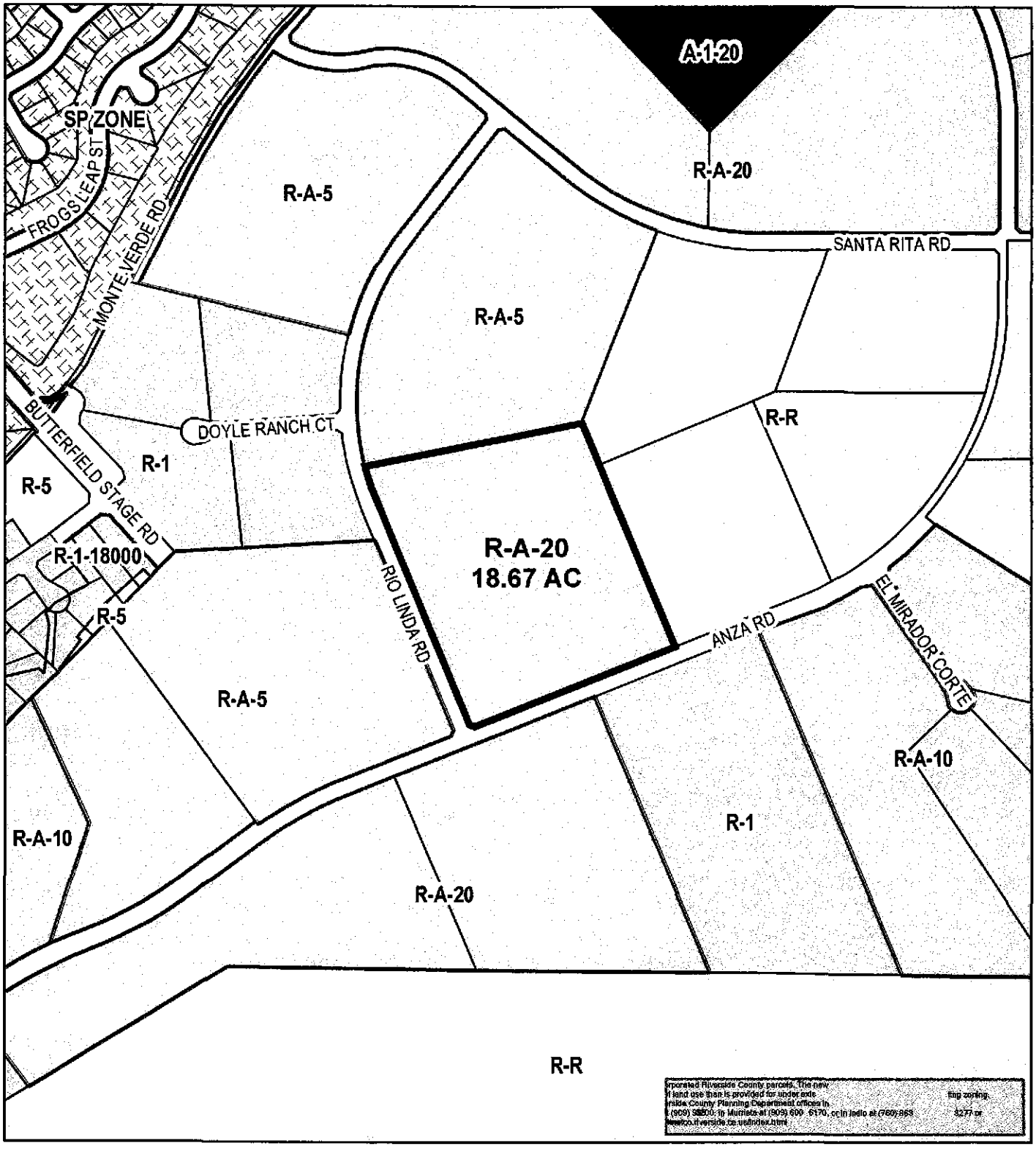
Assessors Bk. Pg. 966-38
Thomas Bros. Pg. 980 A3

0 500 1,000 2,000 3,000 Feet

Supervisor Stone
District 3
Date Drawn: 3/04/08

GPA00986
EXISTING ZONING

Planner: Amy Aldana
Date: 3/10/08
Exhibit 2



RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
Area: Rancho California
Township/Range: T8SR2W
Section: 23

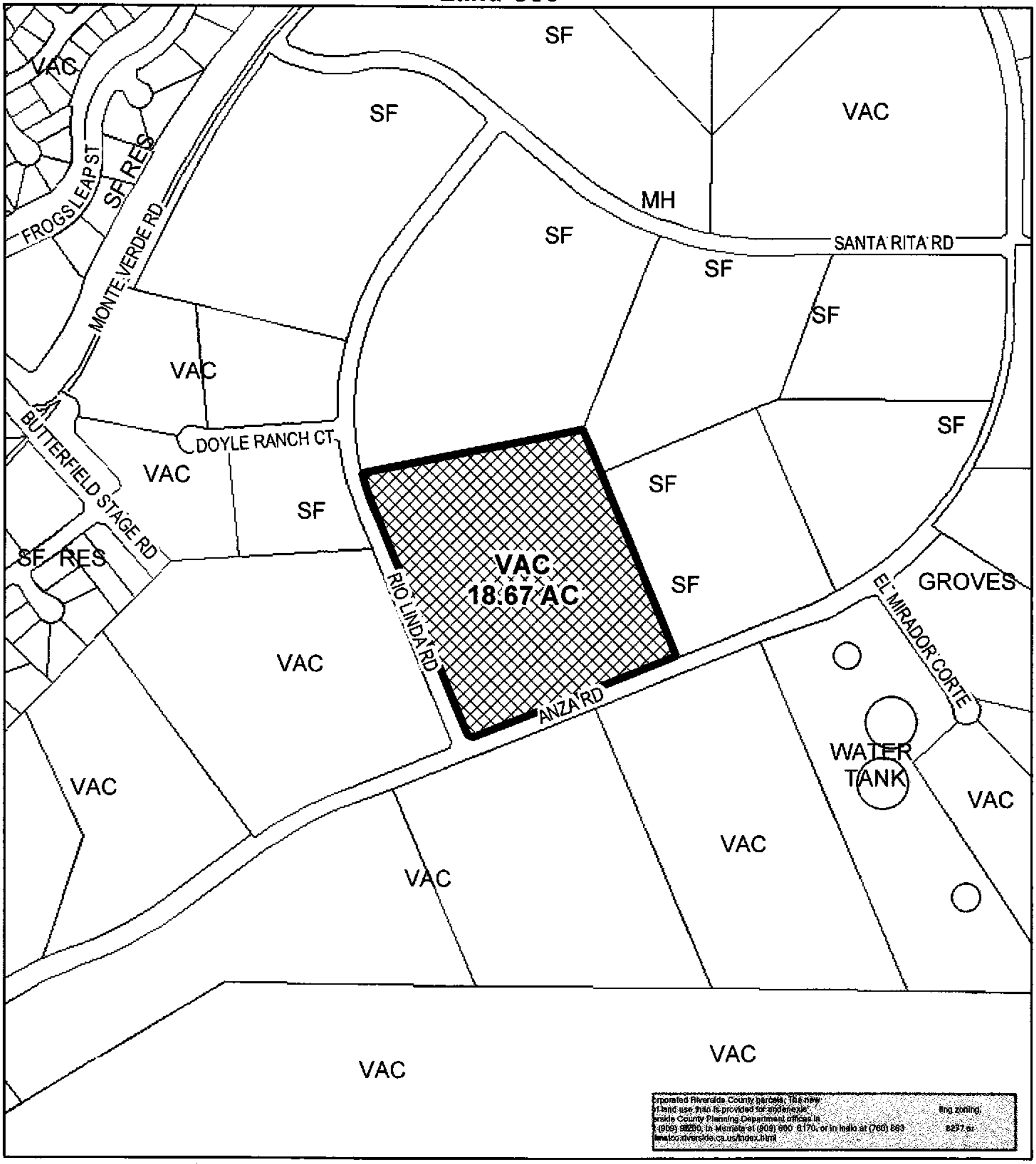
Assessors
Bk. Pg. 966-38
Thomas
Bros. Pg. 980 A3

0 300 600 1,200 1,800
Feet

Supervisor Stone
District 3
Date Drawn: 3/04/08

GPA00986
Land Use

Planner: Amy Aldana
Date: 3/10/08
Exhibit 1



RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
Area: Rancho California
Township/Range: T8SR2W
Section: 23

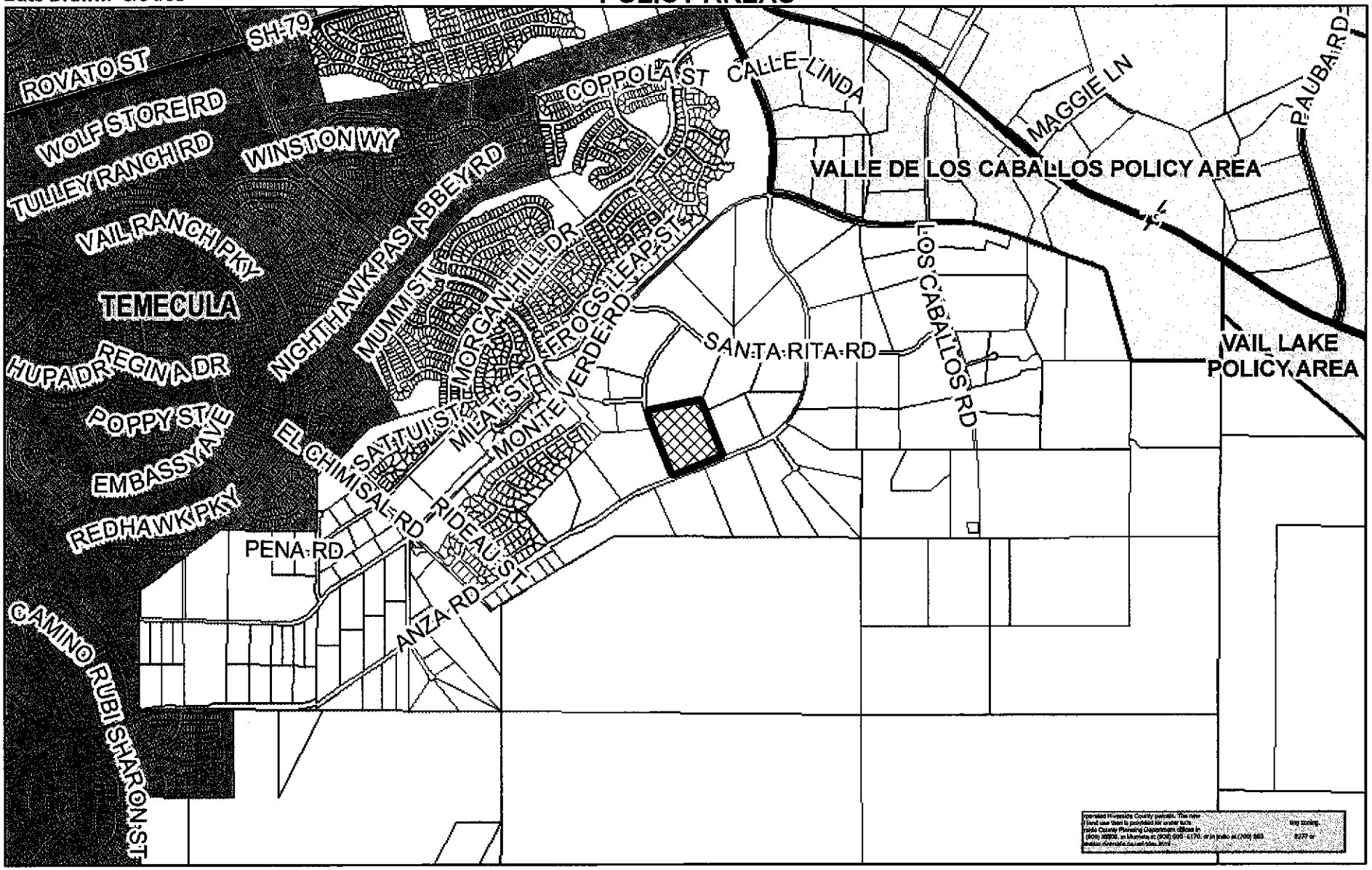
Assessors
Bk. Pg. 966-38
Thomas
Bros. Pg. 980 A3

0 300 600 1,200 1,800 Feet

Supervisor Stone
District 3
Date Drawn: 3/04/08

GPA00986
POLICY AREAS

Planner: Amy Aldana
Date: 3/10/08
Exhibit 8



RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
Area: Rancho California
Township/Range: T8SR2W
Section: 23

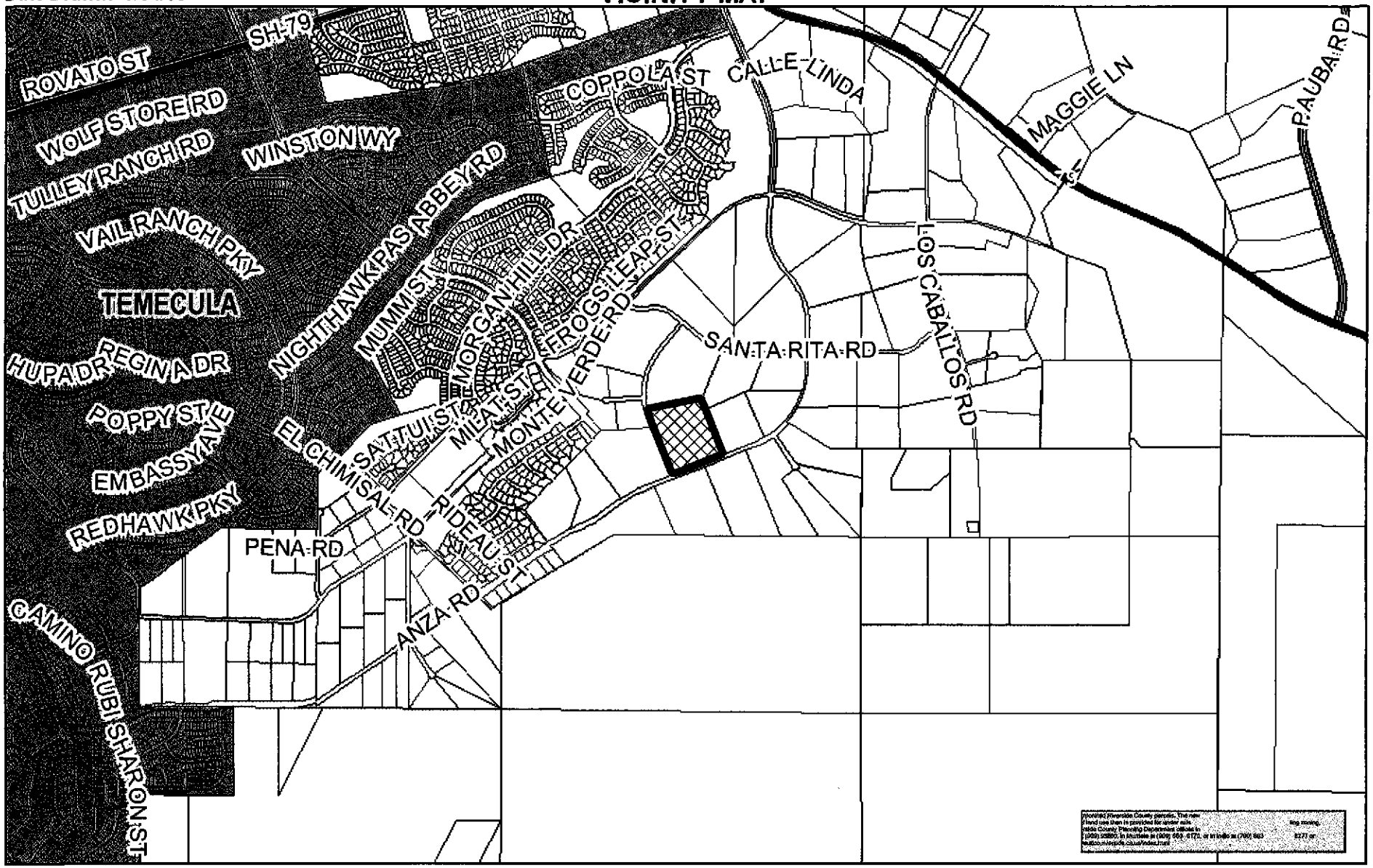
0 2,250 4,500 9,000 13,500 Feet

Assessors
Bk. Pg. 866-38
Thomas
Bros. Pg. 980 A3

Supervisor Stone
District 3
Date Drawn: 3/04/08

GPA00986
VICINITY MAP

Planner: Amy Aldana
Date: 3/10/08
VICINITY MAP



RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
Area: Rancho California
Township/Range: T8SR2W
Section: 23

0 2,250 4,500 9,000 13,500 Feet

Assessors
Bk. Pg. 866-38
Thomas
Bros. Pg. 980 A3

Harrison, Tamara

From: vslengineering@gmail.com on behalf of Richard Valdez [vsl.engineering@verizon.net]
Sent: Wednesday, November 26, 2008 9:11 AM
To: Harrod, Mike
Cc: Ron & Lynda Smith
Subject: GPA Application 00986
Attachments: Geologic report 1484.pdf

Mike, you mentioned a concern that the subject property is affected by a County Fault Study Zone. This study zone extends east-west and also traverses Tract 32227, which is immediately adjacent to the subject site.

The developers of Tract 32227 prepared County Geologic Report No. 1484, which included fault trenching, but found no evidence of faulting. See last paragraph on Page 3. No setbacks or other mitigation measures were considered necessary for Tract 32227.

We are providing the attached letter to supply you with the most current information available and hope that the potential for earthquake faulting will not cause denial of this application.

Please feel free to contact me if you have any questions or need further information.

--
Richard Valdez
VSL Engineering
951-296-3930

T.H.E. Soils Co., Inc.

Phone: (951) 894-2121 FAX: (951) 894-2122
41548 Eastman Drive, Unit G • Murrieta, CA 92562

E-mail: thesoilsco@aol.com

January 31, 2006

Mr. Steve Kupferman
C/o Mr. Dave Jones
Riverside County Building & Safety Department
P.O. Box 1629
Riverside County, California 92502-1629

SUBJECT: **RESPONSE TO RIVERSIDE COUNTY BUILDING & SAFETY DEPT. CONDITIONS OF APPROVAL REVIEW SHEET**
COUNTY GEOLOGIC REPORT NO. 1484 (Geologic)
Preliminary Geotechnical Investigation
Proposed 58-Acre Residential Development
Tentative Tract Map No. 32227
Anza Road South of Butterfield Stage Road
Temecula Area, Riverside County, California
Work Order No. 457401.00R

Dear Mr. Kupferman:

We have prepared this letter in response to the referenced "Conditions of Approval" Review Sheet prepared by the County of Riverside Building and Safety Department dated July 8, 2005. For clarification, we have reiterated the review comments followed by our response.

ITEM NO. 1:

The Supplemental Photo-Lineament Review report referenced above should be revised as follows: a) include a map indicating the location of the County Fault and associated Zone; and b) include copies of published geologic maps that cover the site and surrounding vicinity, such as reports by Kennedy, Mann, Rogers.

RESPONSE ITEM NO. 1:

Our "Supplemental Photo-Lineament Review" report (T.H.E., 2004a) has been revised to include a current copy of the "Tentative Tract Map No. 32227 prepared by Hunsaker & Associates Irvine, Inc. The approximate location of the County fault and associated Zone has been plotted on the tentative tract map presented as our Regional Geologic Map, **Plate 1**. In accordance with your request we have included the portions of the geologic maps prepared by both Rogers (1992) and Kennedy (1977), that includes the subject site (**Figures 1 & 2**). All three referenced geologic maps were utilized in the preparation of both our "Supplemental Photo-Lineament Review" report (T.H.E., 2004a) and our "Preliminary Geotechnical Report" (T.H.E., 2004b).

A wet signed copy of the revised "Supplemental Photo-Lineament Review" has been included with this response letter and is included in **Appendix F.**

ITEM NO. 2:

The project geologist should consider trenching the weak tonal change in vegetation and moderate lineament observed to coincide with the mapped Riverside County fault and fault mapped by Rogers, so as to prove the existence or non-existence of active faulting on the site. The mere absence of geomorphic expression as indicated in the report does not prove or disprove the existence of faulting.

RESPONSE ITEM NO 2:

In accordance with your request, we have trenched across the location of the mapped Riverside County fault south of Temecula in southwest Riverside County, California. A majority of the subject site is located within a County of Riverside Fault Zone (see **Figure 1**). The county fault hazard zone map depicts a northeast trending fault trace intersecting the central portion of the subject site (see **Plate 1**). The purpose of our exploratory fault trench was to either prove or disprove the presence of faulting within the property boundary. Mapping of the trench was performed between December 19, 2005 and December 20, 2005. Mr. Dave Jones, the County of Riverside Geologist inspected the trench on December 20, 2005.

During our previous photo-lineament review of the subject site (T.H.E., 2004a), a northeast trending moderate lineament was noted approximately 0.4-kilometers southwest of the subject site and extended approximately 1.8-kilometers to the southwest. The observed lineament coincides with a short, straight southwest trending local drainage segment. This feature roughly aligns with a weak tonal change in vegetation observed in the 1974 photographs on the northerly portion (APN 952-250-015) of the subject site. Both the weak tonal change in vegetation and the moderate lineament correspond to the County of Riverside fault hazard zone and the fault traces mapped by both Mann (1955) and Rogers (1992). For the purpose of this report, we have defined a moderate lineament as the following:

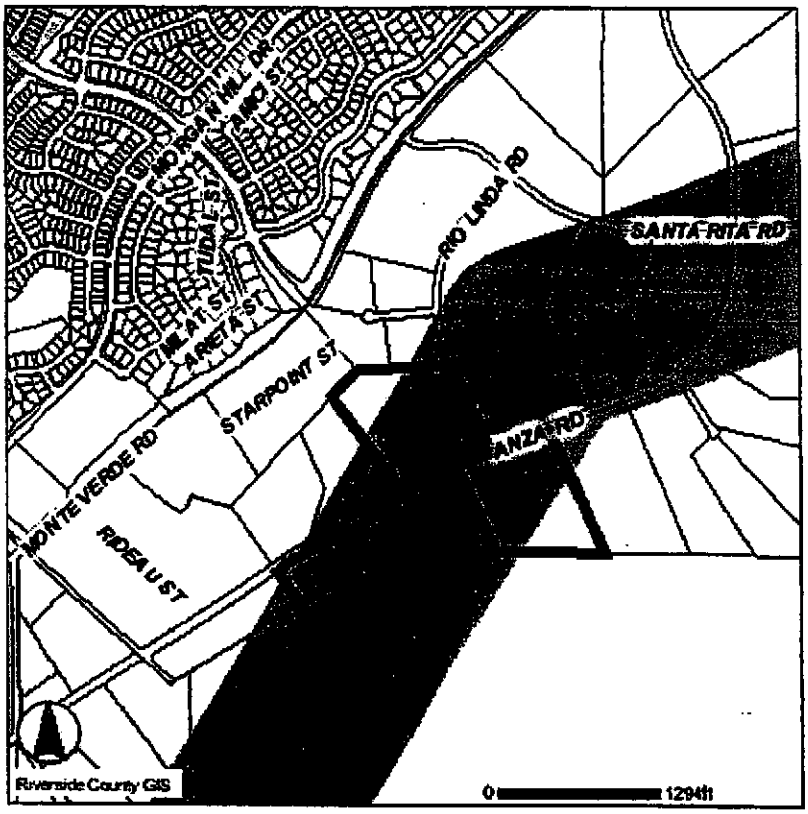
A moderate lineament may have local sinuosity, is less than a few kilometers long, may be locally wider than long, is more diffuse on imagery and may coincide with apparent alignments of topographic saddles or local drainage segments.

Our exploratory fault trench FT-1 was excavated from the intersection of Anza and Rio Linda Roads approximately 415 lineal feet to the northwest and across the mapped location of the inferred county fault and the weak tonal change in vegetation noted on the 1974 aerial photographs.

Our exploratory trenching was oriented in a northwest - southeast direction, perpendicular to the inferred mapped fault trend. Graphical illustrations representing the exposed lithology within our exploratory trenches are provided in **Appendix B**. A summary of the identified stratigraphic features is provided below.

Stratigraphic logging of our trench, which generally maintained a depth of 10-ft bgs, exposed 3 to 4-ft of Recent alluvial deposits overlying late Pleistocene-age sediments of the Pauba formation to the

RIVERSIDE COUNTY GIS



Selected parcel(s):
952-250-006 952-250-007 952-250-015

FAULT ZONES

☐ SELECTED PARCEL ☐ NOT IN A FAULT ZONE ■ COUNTY FAULT ZONE

IMPORTANT
This information is made available through the Riverside County Geographic Information System. The information is for reference purposes only. It is intended to be used as base level information only and is not intended to replace any recorded documents or other public records. Contact appropriate County Departmer or Agency if necessary. Reference to recorded documentse and public records may be necessary and is advisable.

MAP PRINTED ON...01/30/2006

FIGURE 1

maximum depth explored of 12-ft below the ground surface. By definition, active faulting (<11,000 years) would displace the late Pleistocene-age sediments. No displacement of the sediments by apparent faulting was observed within this trench. Good stratigraphic control was maintained throughout the trench.

The 3 to 4-ft of alluvial soils consist of very dark grayish brown (Munsell Soil Color Chart-10YR 3/2) silty Sand (Unified Soil Classification-SM). The silty sand can generally be described as predominately fine grained with minor medium and coarse, rare gravel, dry to slightly moist with abundant pinpoint pores, fine roots and animal burrows and holes.

The upper 3 to 8-ft of the sedimentary bedrock consists of a dark yellowish brown (10YR 4/4) gravelly silty sandstone (SM) that can generally be described as fine to coarse grained, abundant gravel, subrounded to subangular, poorly sorted, dense and weakly cemented. This unit pinches out to the west at approximately station 3+70. The lower sedimentary unit generally consisted of a brown (10YR 4/4) sandy siltstone (ML) that can be described as stiff, moist with abundant calcareous veinlets. This unit grades to the west at approximately station 3+63 into a dark brown (10YR 3/3) sandy clay (SC) that can be described as fine to coarse grained, minor gravel, stiff and well indurated.

A yellow brown (10YR 5/6) sandstone (SW) was exposed on the extreme westerly portion of our exploratory trench from approximately station 3+82 to approximately station 4+00. This unit can be described as coarse grained, minor gravel, subrounded to subangular, well sorted and moderately indurated.

Our exploratory trench FT-1 was not extended across the entire county mapped zone owing to the absence of geomorphic expressions of faulting observed during of our photo-lineament review, site mapping and literature review (Kennedy, 1977). No evidence of faulting was identified within exploratory trench FT-1, which was excavated across both the mapped location of the inferred county fault and the observed weak tonal change in vegetation observed in the 1974 photographs. The trench extended from the intersection of Anza and Rio Linda Roads approximately 415-ft to the northwest and across the break in slope on the small hill to the northwest (see **Plate 1**). No evidence of faulting or sympathetic fracturing was observed within our exploratory trench.

** The mapped county fault has a northeasterly trend, which is not consistent with the general northwest-southeast trend of the known active faults in the vicinity of the subject site. Owing to the absence of both geomorphic expression of faulting and observed faulting within our exploratory trench, which exposed late Pleistocene-age sediments, it is our opinion there is no evidence of faulting on the subject site and that no setbacks or other mitigation measures are required. We anticipate that the fault mapped by Mann (1955) and Rogers (1992) and subsequently zoned by the County of Riverside coincided with the short, straight southwest trending local drainage segment located approximately 0.4-kilometers southwest of the subject site. The observed lineament trend is not consistent with the general northwest-southeast trend of known active faults in the region and may be related to lithology changes and not tectonic causes.

ITEM NO. 3

The geotechnical consultant should provide a more detailed analysis of slope stability than that provided in the Slope Stability Analysis letter referenced above. At a minimum, the consultant should provide an appropriate quantitative analysis (gross and surficial stability under static and seismic conditions) for the proposed fill slopes; and an engineering geologic analysis of the proposed 106 foot high cut slopes (including site specific geologic mapping, cross sections, and appropriate analysis of any out of slope adverse geologic structures).

RESPONSE ITEM NO 3

A detailed slope stability has been performed since the "Slope Stability Analysis" letter was completed and site development plans have now been finalized. Subsurface exploration, field reconnaissance, and additional mapping of the site were conducted on May 25, 2005. A total of three (3) exploratory trenches were excavated utilizing a Case No. 580 Super M extenda-backhoe equipped with a 24-inch bucket. Exploratory trench T-2 was advanced to the maximum depth explored of 9.2-ft below the ground surface (bgs).

Information collected during our field mapping, and the approximate location of the exploratory trenches and borings are depicted on our Geologic Map, **Plate 1.** Our field geologist prepared field logs, obtained bulk soil samples for laboratory testing and supervised excavation of the trenches. Copies of our exploratory trench logs are presented in **Appendix B.**

Representative bulk samples of soils encountered during our subsurface exploration were obtained for laboratory testing. Laboratory testing to determine the engineering parameters of representative soils included maximum density/optimum moisture determinations, sieve analysis, direct shear testing and sand equivalent testing.

Laboratory testing was conducted in accordance with ASTM, Caltrans, and Uniform Building Code (CBC) test specifications, where applicable. The results of our laboratory tests are presented in **Appendix C** of this report. GeoSoils, Inc. of Carlsbad, California performed direct shear testing.

We anticipate that cut and fill slopes constructed at a 2:1 (horizontal:vertical) slope ratio, to a maximum height of approximately 60-ft, will be surficially and grossly stable if constructed in accordance with the recommendations presented in this report and in **Appendix E** of this report. Based on our review of the "Tentative Tract Map No. 32227", fill and cut slopes have been designed at 2:1 (horizontal:vertical) slope ratio to maximum vertical heights of 30 and 60-ft, respectively.

Based on the results of our slope stability analysis, presented in **Appendix D**, we anticipate that proposed fill and cut slopes will be surficially and grossly stable constructed at a slope ratio of 2:1 (horizontal:vertical) to vertical design heights of 30 and 60-ft, respectively. Surficial stability calculations are included in **Appendix D.**

We trust that this information will allow for the completion of the review and approval process. Should you have any questions, or require additional information, please do not hesitate to contact our office.

Very truly yours,

T.H.E. Soils Company, Inc.

John P. Frey
Project Geologist

John T. Reinhart, RCE 23464
Registration Expires 12/31/07

James R. Harrison
Project Manager

Christopher Krall, CEG 1816
Engineering Geologist
Registration Expires 3/31/07

ATTACHMENTS

Figure 1 - County Fault Zone Map (1,294-scale)
Plate 1 - Geologic Map (100-scale)
Appendix A - References
Appendix B - Exploratory Trench and Fault Trench Logs
Appendix C - Laboratory Analysis
Appendix D - Slope Stability Analysis
Appendix E - Standard Grading and Earthwork Specifications

FAX MEMO

February 1, 2009

TO: Mike Harrod

FROM: Dan Silver, EHL (213-804-2750)

RE: Item 6.0, General Plan Amendment Initiation Proceedings (February 4, 2009)

Pages: 5 (including cover)

Mike –

Could this written testimony please be distributed to Commissioners in advance of the hearing? I have also sent an electronic copy for that purpose.

I regret being unable to attend the hearing in person.

By the way, I met with George, Ron, and Damian on these issues last week.

Best wishes for the New Year,
Dan

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

February 1, 2009

VIA ELECTRONIC MAIL AND FACSIMILE

Riverside County Planning Commission
ATTN: Mike Harrod
County of Riverside
4080 Lemon St., 9th Floor
Riverside, CA 92501

RE: Item 6.0, General Plan Amendment Initiation Proceedings (February 4, 2009)

Dear Chair and Commission Members:

The Endangered Habitats League (EHL) remains deeply concerned over the landowner-initiated GPAs. The process is profoundly flawed, without formal stakeholder input or adequate community outreach. Dozens of GPAs affecting Foundation elements are being considered in a piecemeal manner, without integration with the County-initiated GPA 960 process.

A high degree of planning discipline is needed during this important Five-Year Update. However, rigor is often lacking in the Planning Dept. recommendations. We are reluctantly reaching the conclusion that the Planning Dept. is not functioning at a level commensurate with the task.

As a reminder, the General Plan Administrative Element provides the operative standard for such decisions:

> a. The foundation change is based on ample evidence that *new conditions or circumstances* disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan. (Emphasis added.)

Instead of a "mapped" General Plan that provides stability for land use and for infrastructure and service provision, many recommendations threaten to revert to the pre-2003 era, when open space was treated as a "holding zone" for any development that water and sewer lines could reach. We therefore urge the Commission and Board to supply the discipline necessary to realize the benefits of the Certainty System and to ensure that new development is both needed and optimally sited.

Comments on specific items follow.

Item 6.1, GPA 621 (Lakeview Nuevo)

No position.

Item 6.2, GPA 770 (Lakeview Nuevo)

No position.

Item 6.3, GPA 841 (Lakeview Nuevo)

No position.

Item 6.4, GPA 957 (REMAP)

This proposed change from Rural and Open Space-Rural to 1-acre Rural Community is of concern to EHL and will be monitored.

Item 6.5, GPA 959 (Mead Valley)

Concur with the staff recommendation for non-initiation on land use and public safety grounds.

Item 6.6, GPA 1030 (Temescal)

Disagree with the staff recommendation to initiate the change of 446 acres within MSHCP Criteria Cells from the most restrictive designations of Open Space-Rural and Rural to a mixture of high and low density residential and commercial retail. This land is obviously critically important wildlife habitat, with Temescal Wash as an outstanding feature. While nearby urbanization exists, this does not in and of itself constitute justification to convert all surrounding land to the same use. No planning need for additional urban land has been provided.

Most importantly, despite this being a critical area for the MSHCP, virtually no information has been provided by staff as to the how the proposed redesignation would affect MSHCP preserve assembly. Would it advance or hinder it? If land acquisition is needed, the proposed up-planning might constitute a gift of public funds. *What is the opinion of the Environmental Programs Department of this proposed change?* At best, initiation is premature and much additional information is necessary.

Item 6.7, GPA 1037 (Lake Mathews)

Disagree with the staff recommendation to convert 38 acres of intact Rural land to estate lots. Staff has *not* addressed the required finding that new conditions or circumstances compel a change. If every Rural property on the border of Rural-Rural Community converts to Rural Community on the basis of adjacency, then that is a prescription for the progressive elimination of Rural.

Item 6.8, GPA 920 (Southwest Area Plan) (72 acres)
Item 6.9, GPA 986 (Southwest Area Plan) (19 acres)
Item 6.10, GPA 1026 (Southwest Area Plan) (150 acres)

Disagree with the staff recommendation to initiate the change of a total of 241 acres of Rural, Rural Mountainous, and Agricultural land to Community Development on the basis of a "trend" that appears to be nothing other than the trend of sprawl. The land involved now comprises a block of highly intact rural and agricultural land on the eastern edge of Highway 79 urbanization. These very lands now form a border or urban edge that *defines* communities, with urban to the west and rural and open space to the east.

Without planning justification, staff is recommending a series of GPAs that would transform this area and push development further east along the scenic Highway 79 corridor. Traffic alone would give pause to this recommendation. The "progression of Community Development land use designations" referred to in the staff report is simply a progression of *requests* for GPAs that is being confused with real planning.

What is the vision for this region, and how was it arrived at? What community outreach occurred? What is the absorption capacity (in years of growth) of the current General Plan? Is more urban land needed, and on what basis? What growth accommodation alternatives were considered other than greenfield development? If more urban land is needed, where is it optimally sited given transportation, open space, and greenhouse gas considerations? *These questions are never asked let alone answered.* While adjacency is *one* legitimate factor, it is not *sufficient* to justify land conversion.

The landowner-initiated GPAs have become a piecemeal process that fails to consider the "big picture" questions posed above. This series of GPAs typifies the loss of rural, agricultural, and open space without planning justification. Where will the eastward progression of rural conversion stop? How far behind are requests – and Planning Dept. acquiescence – for the land adjacent to these GPAs to follow the "trend" and follow suit? The care needed to conduct a successful Five-Year Update is missing.

Item 6.11, GPA 1042 (Southwest Area Plan)

Concur with concerns expressed by staff but do not fully understand the proposal or the "tentatively decline" recommendation. What uses would Commercial Tourist allow? Clearly, the scenic hillside visual character needs to be protected, but the staff report does not compare the impacts of Commercial Tourist with any residential lots that could be graded under the current Rural Mountainous. As noted in the staff report, MSHCP assembly is also an important factor.

Item 6.12, GPA 807 (Prado-Mira Loma)

No position.

Item 6.13, GPA 887 (Prado-Mira Loma)

No position.

Thank you for considering our views, and we look forward to working with you as the Five-Year Update proceeds.

Sincerely,

Dan Silver, MD
Executive Director

Electronic cc: Board Members
George Johnson, TLMA
Ron Goldman, Planning Dept.
Carolyn Luna, Environmental Programs Dept.
Charles Landry, Regional Conservation Authority
Interested parties