

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

102B



FROM: TLMA – Planning Department

SUBMITTAL DATE:  
January 26, 2010

**SUBJECT: GENERAL PLAN AMENDMENT No. 916** – Foundation-Regular – Applicant: Louie's Nursery-Mary Kanner – Engineer/Representative: Trip Hord Associates - Third Supervisorial District - Winchester Zoning Area - Harvest Valley/Winchester Area Plan: Rural: Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) – Location: Northerly of Scott Road, easterly of Leon Road, southerly of Wickerd Road, and westerly of Hallberg Avenue. - 3.91 Gross Acres - Zoning: Rural Residential (R-R) - **REQUEST:** This General Plan Amendment proposes to amend the General Plan Foundation Component of the subject site from Rural (RUR) to Community Development (CD) and to amend the General Plan land use designation of the subject site from Rural Residential (RR) (5 Acre Minimum Lot Size) within the Highway 79 Policy Area to Commercial Retail (CR) (0.20-0.35 Floor Area Ratio) - APN: 466-230-062

**RECOMMENDED MOTION:**

The Planning Director recommends that the Board of Supervisors tentatively decline to 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

Ron Goldman  
Planning Director

RG:mh  
*RG*

REVIEWED BY EXECUTIVE OFFICE

DATE 2/22/10  
Tina Grande  
Departmental Concurrence

ATTACHMENTS FILED WITH  
THE CLERK OF THE BOARD

Policy  
 Policy

Consent  
 Consent

Dep't Recomm.:  
Per Exec. Ofc.:

Prev. Agn. Ref.

District: Third

Agenda Number:

15.7

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 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.

**PLANNING COMMISSION  
MINUTE ORDER OCTOBER 28, 2009  
RIVERSIDE COUNTY ADMINISTRATIVE CENTER**

**I. AGENDA ITEM 8.8: GENERAL PLAN AMENDMENT NO. 916** – Foundation-Regular – Applicant: Louie's Nursery-Mary Kanner – Engineer/Representative: Trip Hord Associates - Third Supervisorial District - Winchester Zoning Area - Harvest Valley/Winchester Area Plan: Rural: Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) – Location: Northerly of Scott Road, easterly of Leon Road, southerly of Wickerd Road, and westerly of Hallberg Avenue. - 3.91 Gross Acres - Zoning: Rural Residential (R-R) - APN: 466-230-062.

**II. PROJECT DESCRIPTION**

This General Plan Amendment proposes to amend the General Plan Foundation Component of the subject site from Rural (RUR) to Community Development (CD) and to amend the General Plan land use designation of the subject site from Rural Residential (RR) (5 Acre Minimum Lot Size) within the Highway 79 Policy Area to Commercial Retail (CR) (0.20-0.35 Floor Area Ratio).

**III. MEETING SUMMARY**

The following staff presented the subject proposal:

Project Planner, Tamara Harrison at 951-955-9721 or e-mail [tharriso@rctlma.org](mailto:tharriso@rctlma.org).

The following spoke in favor of the subject proposal:

Mary Kannor, Applicant, 16310 Porter Ave., Riverside, California 92504

Trip Hord, Applicant's Representative, 5029 La Marl, Riverside, California 92507

No one spoke in a neutral position or in opposition of the subject proposal.

**IV. CONTROVERSIAL ISSUES**

NONE

**V. PLANNING COMMISSION ACTION**

The Planning Commission recommended to the Board of Supervisors;

**TENTATIVELY DECLINE THE INITIATION** of the General Plan Amendment.

**VI. CD**

The entire discussion of this agenda item can be found on CD. For a copy of the CD, please contact Chantell Griffin, Planning Commission Secretary, at (951) 955-3251 or E-mail at [cgriffin@rctlma.org](mailto:cgriffin@rctlma.org).

Agenda Item No.: 8.8  
Area Plan: Harvest Valley/Winchester  
Zoning District: Winchester Area  
Supervisory District: Third  
Project Planner: Tamara Harrison  
Planning Commission: October 28, 2009

General Plan Amendment No. 916  
Applicant: Louie's Nursery  
Engineer/Representative: Trip Hord

## COUNTY OF RIVERSIDE PLANNING DIRECTOR'S REPORT AND RECOMMENDATIONS

### RECOMMENDATIONS:

The Planning Director recommends that the Board of Supervisors **tentatively decline** to adopt an order initiating proceedings for General Plan Amendment No. 916 from Rural: Rural Residential to Community Development: Commercial Retail and the Planning Commission made the comments below. The Planning Director continues to recommend to tentatively decline to adopt an order initiating proceedings. 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 inquired about an approximate timeframe for the adoption and implementation of the Rural Commercial Policy being proposed under General Plan Amendment No. 960. The Planning Director indicated that he would like to see the General Plan update completed in 2010. Mr. Roth also agreed with Commissioner Petty's comments that initiation to Commercial Retail at the subject site is not appropriate and that the Rural Commercial Policy is a better option.

**Commissioner John Snell:** No Comments

**Commissioner John Petty:** Commissioner Petty agreed with staff that initiation to Commercial Retail at the subject site was not appropriate and that the Rural Commercial Policy that is being proposed as part of the overall General Plan update would be a better option at the site. Commissioner Petty also commented that if the initiation was allowed to move forward as proposed by the applicant, to Commercial Retail, there would be no way to make certain that an incidental rural use such as a nursery would be developed there.

**Commissioner Jim Porras:** No Comments

**Commissioner Jan Zuppardo:** No Comments

Agenda Item No.: 8.8  
Area Plan: Harvest Valley/ Winchester  
Zoning District: Winchester Area  
Supervisory District: Third  
Project Planner: Tamara Harrison  
Planning Commission: October 28, 2009

General Plan Amendment No. 916  
Applicant: Louie's Nursery  
Engineer/Representative: Trip Hord

## COUNTY OF RIVERSIDE PLANNING DEPARTMENT STAFF REPORT

### PROJECT DESCRIPTION AND LOCATION:

The applicant proposes to amend the General Plan Foundation Component and Land Use designation of the subject site from "Rural: Rural Residential" (RUR:RR) (5 acre minimum lot size) to "Community Development: Commercial Retail" (CD:CR) (0.20- 0.35 Floor Area Ratio) on approximately 3.91 acres. The project is located northerly of Scott Road, southerly of Wickerd Road, easterly of Leon Road and westerly of Halberg Avenue.

### POTENTIAL ISSUES OF CONCERN:

The subject site is located in the "Winchester" community within the Harvest/Valley Winchester area plan and also falls within the General Plan's "Highway 79 Policy Area." The community is characterized by a commercial core with a western theme that is located along Winchester Road near Simpson Road. The subject site lies outside of the commercial core area and is surrounded by Rural and Rural Community land use designations. The area immediately surrounding the subject site is dominated by scattered single family residential uses on larger lots. The proposal to Commercial Retail at the subject site would conflict with the overall vision for the area and would be inconsistent with the existing land use pattern.

Although the change to Commercial Retail is not consistent with the existing character and land use pattern in the area, staff does recognize that commercial uses that are rural in nature may be appropriate in some rural communities. Therefore, as a part of the overall 2008 General Plan update, staff is exploring the allowance of commercial uses in these rural areas through the "Rural Commercial Policy" (see attached). The policy has not been adopted by the Board of Supervisors and is currently under review with the Planning Department. Likewise, the applicant's current zoning Rural Residential (RR) may contain provisions for the land use that the applicant is seeking.

No evidence of new conditions or circumstances in the area has been provided that would substantiate the request at the time the staff report was written.

The current proposal is inconsistent with the General Plan's Highway 79 Policy Area. The policy area requires that residential development be proposed at 9% below the mid-point of the existing designation due to transportation infrastructure and capacity deficiencies. The policy did not include provisions to increase potential densities within the policy area as proposed by this amendment. A workshop was held at the Planning Commission meeting on September 30, 2009 in order to discuss the Highway 79 Policy area and the regular Foundation General Plan Amendments that fall within the Policy Area. As a result of the workshop, the Planning Commission recommended that those Foundation General Plan Amendments within the policy area be brought forward on a case by case basis in order to determine the appropriateness of each proposal and that the Highway 79 policies be reviewed during the General Plan update for potential amendments.

**RECOMMENDATION:**

The Planning Director recommends not initiating proceedings for General Plan Amendment No. 916 from Rural: Rural Residential to Community Development: Commercial Retail. 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.

**INFORMATIONAL ITEMS:**

1. This project was filed with the Planning Department on January 31, 2008.
2. Deposit Based Fees charged for this project as of the time of staff report preparation, total \$4901.61.
3. The project site is currently designated as Assessor's Parcel Number: 466-230-062.



**INCIDENTIAL RURAL COMMERCIAL POLICY SUMMARY (please refer to attached draft policy)**

The objective of the new policy is to provide a mechanism in which needed incidental commercial uses, such as local retail and basic services in remote and/or rural areas, may be allowed under the rural and rural community General Plan Foundation Components.

The effort will involve development of policies outlining when such uses may be permitted, and the criteria used to determine when such uses are appropriate to a given area.

**Detailed Rural Commercial Information**

Policies will be added to allow small-scale commercial uses in Rural and Rural Community Foundation Component Areas to service the rural community. The development standards and allowed uses will be compatible with the standards outlined in the Zoning Ordinance for Rural Commercial Zone. Parcels that are zoned for Rural Commercial will be allowed to develop small-scale commercial uses which will provide services for travelers and the local rural community residents.

**Goals for the proposed changes**

1. Addition of policies that will allow small-scale commercial/industrial uses in Rural/Rural Community Foundation Components.
2. Provide basic services in close proximity to rural residents.
3. Limit the intensity of commercial development in Rural/Rural Community areas.
4. Outline specific circumstances where commercial uses may be allowed.

**FOR INTERNAL USE ONLY**  
**DRAFT**  
**GPA NO. 00960**  
**GENERAL PLAN AMENDMENTS TO RURAL AND RURAL COMMUNITY**  
**LAND USE DESIGNATION**

(All added text is marked with *italic* font style and all deleted text is marked with ~~strikethrough~~ font effect)

**Rural Area Plan Land Use Designations**

The Rural General Plan Foundation Component is intended to identify and preserve areas where the rural lifestyle is the desired use, including areas of remote cabins, residential estates, limited agriculture, equestrian, and animal keeping uses. In the future, the challenge will focus on preserving the character of established rural areas while accommodating future growth, preventing the encroachment of more intense urban uses, and ensuring compatibility between rural and urban uses.

As shown on the Land Use Designation Key (Figure LU-5), the Rural General Plan Foundation Component consists of three Area plan land use designations: Rural Residential, Rural Mountainous, and Rural Desert. The Rural Village Area plan overlay is discussed at the end of this Element.

***Rural Residential (RR)*** - The Rural Residential land use designation allows one single family residence per five acres, as well as limited animal-keeping and agricultural activities. For multi-lot developments, the minimum lot size per residential unit is 2.5 acres, though the overall density of the development must not exceed 0.2 dwelling units per acre. Limited recreational uses, compatible resource development (not including the commercial extraction of mineral resources) and associated uses, and governmental uses are also allowed within this designation. *Small-scale incidental commercial activities that are compatible with the surrounding uses are allowed.*

***Rural Mountainous (RM)*** - The Rural Mountainous land use designation allows single family residential uses, limited animal-keeping and agricultural uses, with a maximum residential density of 1 dwelling unit per 10 acres. This designation applies to areas of at least 10 acres where a minimum 70% of the area has slopes of 25% or greater. It also applies to remote areas that are completely or partially surrounded by slopes greater than 25%, and that do not have both county-maintained access and access to community sewer and water systems. Limited recreational uses, compatible resource development (which may include the extraction of mineral resources with approval of a surface mining permit) and associated uses, and governmental uses are also allowed within this designation. *Small-scale incidental commercial activities that are compatible with the surrounding uses are allowed.*

***Rural Desert (RD)*** - The Rural Desert land use designation allows for single family residences, limited agriculture and animal keeping uses, with a maximum residential density of 1 dwelling unit per 10 acres. Limited recreational uses; renewable energy uses



including solar, geothermal and wind energy uses, as well as associated uses required to develop and operate these renewable energy sources; compatible resource development (which may include the extraction of mineral resources with approval of a surface mining permit); governmental and utility uses are also allowed within this designation. This designation is generally applied to remote desert areas characterized by poor access and a lack of water and other services. *Small-scale incidental commercial activities that are compatible with the surrounding uses are allowed.*

**Add the following new policy under Rural Area Land Use Designation (LU 17.6)**

*LU 17.7 Rural incidental commercial uses in the outlying rural areas of the county along rural highway corridors for the convenience of residents and travelers are allowed. The development standards for these commercial uses should reflect areas where urban services and facilities are generally unavailable and are not likely to be provided in the near future. The type of uses allowed and the development standards shall be in accordance to the Rural Commercial (C-R) Zone (AI 1)*

- a. The portion of the lot proposed for small-scale commercial development shall be between 0.5 and 2.5 acres.*
- b. The design and scale of the commercial development are encouraged to be compatible with the surrounding uses, protect view sheds and blend in with the rural nature of the area.*
- c. The portion of the lot used for small-scale commercial development is encouraged to be located adjacent to an arterial, mountainous arterial or major roadway. However, it is discouraged to be located within 300 feet of a freeway.*
- d. Rural incidental commercial uses may not be located within 2 miles of a Commercial Retail Community Development Designation and it may not be located within one mile of an area with a Rural Village Land Use Overlay.*

**Insert Rural Community description from page LU-40**

**Rural Community Area Plan Land Use Designation**

The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal – keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. *Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Small-scale commercial activities, such as local grocery stores, gift shops and drug stores, located outside urban boundaries are needed to serve these rural communities. Small-scale incidental commercial uses are allowed.*

Agriculture is permitted in these areas.

**Estate Density Residential (EDR)** - The Estate Density Residential land use designation provides for the development of detached single family residential dwelling units and ancillary structures on large parcels. In the Rural Community Foundation Component (unlike the Community Development Foundation Component, which also permits the

application of the Estate Density Residential designation), equestrian and other animal-keeping uses are expected and encouraged. Agriculture *and small scale incidental commercial uses* is are permitted in this designation. Small scale incidental commercial uses are permitted. The density range is from 1 dwelling unit per 2 acres to 1 dwelling unit per 5 acres.

***Very Low Density Residential (VLDR)*** - The Very Low Density Residential land use designation provides for the development of detached single family residential dwelling units and ancillary structures on large parcels. In the Rural Community Foundation Component (unlike the Community Development Foundation Component, which also permits the application of the Very Low Density Residential designation), equestrian and other animal-keeping uses are expected and encouraged. Agriculture *and small scale incidental commercial uses* is are permitted in this designation. The density range is from 1 dwelling unit per acre to 1 dwelling unit per two acres.

***Low Density Residential (LDR)*** - The Low Density Residential land use designation provides for the development of detached single family residential dwelling units and ancillary structures on large parcels. In the Rural Community Foundation Component (unlike the Community Development Foundation Component, which also permits the application of the Low Density Residential Foundation Component), equestrian and other animal-keeping uses are expected and encouraged. Agriculture *and small scale incidental commercial uses* is are permitted in this designation. The density range is from 2 dwelling units per acre to 1 dwelling unit per acre.]

**Policies:**

- LU 18.1* Require that grading be designed to blend with undeveloped natural contours of the site and avoid an unvaried, unnatural, or manufactured appearance. (AI 23)
- LU 18.2* Require that adequate and available circulation facilities, water resources, sewer facilities and/or septic capacity exist to meet the demands of the proposed land use. (AI 3)
- LU 18.3* Ensure that development does not adversely impact the open space and rural character of the surrounding area. (AI 3)
- LU 18.4* Encourage clustered development where appropriate on lots smaller than the underlying land use designation would allow. While lot sizes may vary, the overall project density must not exceed that of the underlying land use designation unless associated with an incentive program.
- LU 18.5* Encourage parcel consolidation. (AI 29)
- LU 18.6* Provide programs and incentives that allow rural areas to maintain and enhance their existing and desired character. (AI 9, 30)

*LU 18.7 Rural incidental commercial uses in the outlying rural areas of the county along rural highway corridors for the convenience of residents and travelers are allowed. The development standards for these commercial uses should reflect areas where urban services and facilities are generally unavailable and are not likely to be provided in the near future. The type of uses allowed and the development standards shall be in accordance to the Rural Commercial (C-R) Zone (AI 1).*

- a. The portion of the lot proposed for small-scale commercial development shall be between 0.5 and 2.5 acres.*
- b. The design and scale of the commercial development are encouraged to be compatible with the surrounding uses, protect view sheds and blend in with the rural nature of the area.*
- c. The portion of the lot used for small-scale commercial development is encouraged to be located adjacent to an arterial, mountainous arterial or major roadway. However, it is discouraged to be located within 300 feet of a freeway.*
- d. Rural incidental commercial uses may not be located within 2 miles of a Commercial Retail Community Development Designation and it may not be located within one mile of an area with a Rural Village Land Use Overlay.*

*LU 18.8 Areas located within this foundation that are within a City's Sphere of Influence may proceed with a General Plan Amendment application to change into Community Development Foundation without waiting for the 5 year review cycle upon meeting the following conditions:*

- a) Area is located within an existing community that is characterized by lots smaller than 20,000 square feet in net area.*
- b) There is a Memorandum of Understanding between the County and the City that requires sewer services for the establishment of lots smaller than one acre.*
- c) A tract or parcel map is processed concurrently and approved with a condition of approval that requires the extension of a sewer line.*
- d) The proposed project is located within two hundred (200) feet of an existing sewer line.*

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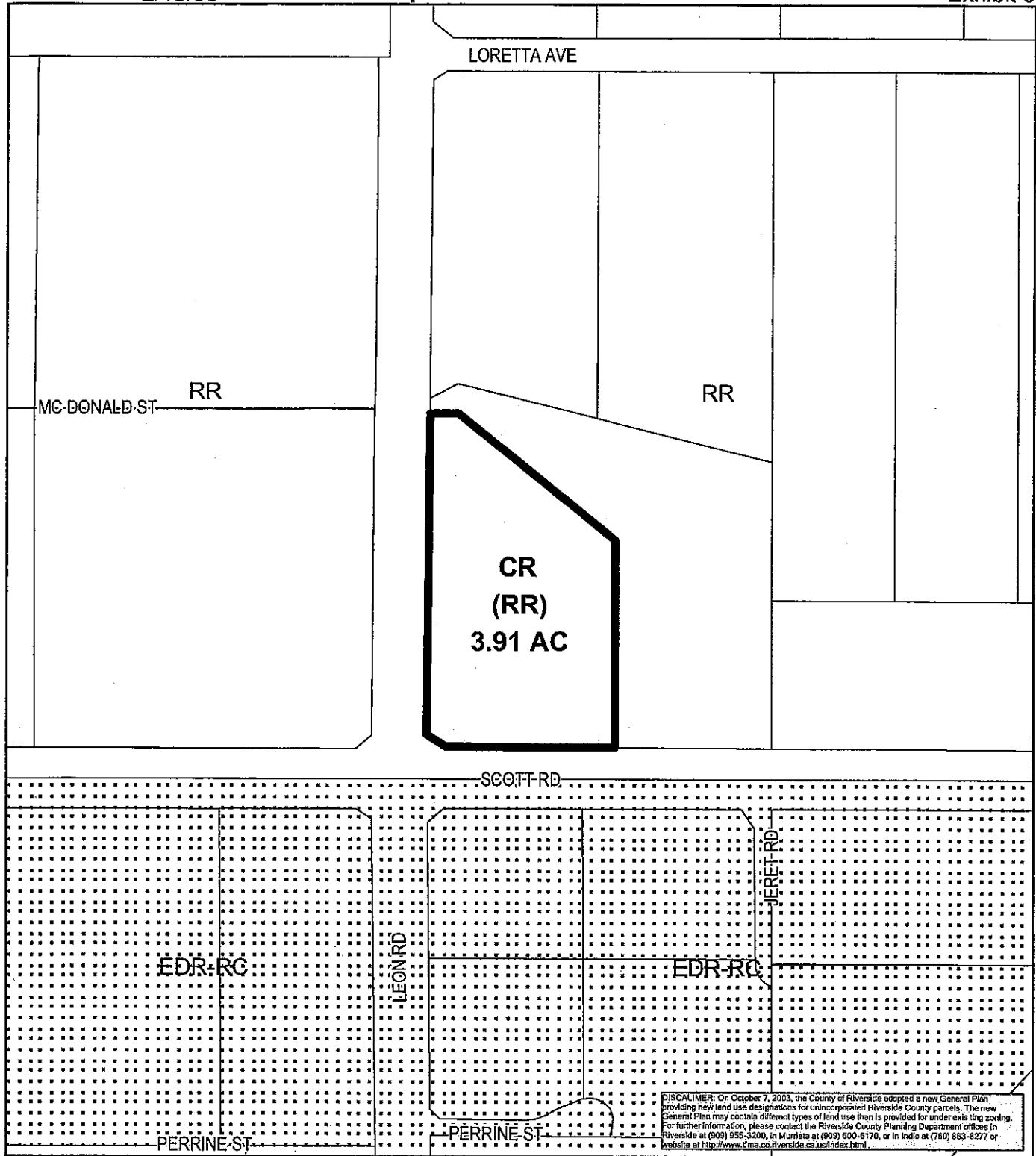
LU Policy ##.# will need to be change accordingly

Supervisor Stone  
District 3  
Date Drawn: 2/15/08

# GPA00916

## Proposed General Plan

Planner: Amy Aldana  
Date: 2/20/08  
Exhibit 6



Zone  
Area: Winchester  
Township/Range: T6SR2W  
Section: 17

### RIVERSIDE COUNTY PLANNING DEPARTMENT

Assessors  
Bk.Pg. 466-23  
Thomas  
Bros. Pg. 899 B1

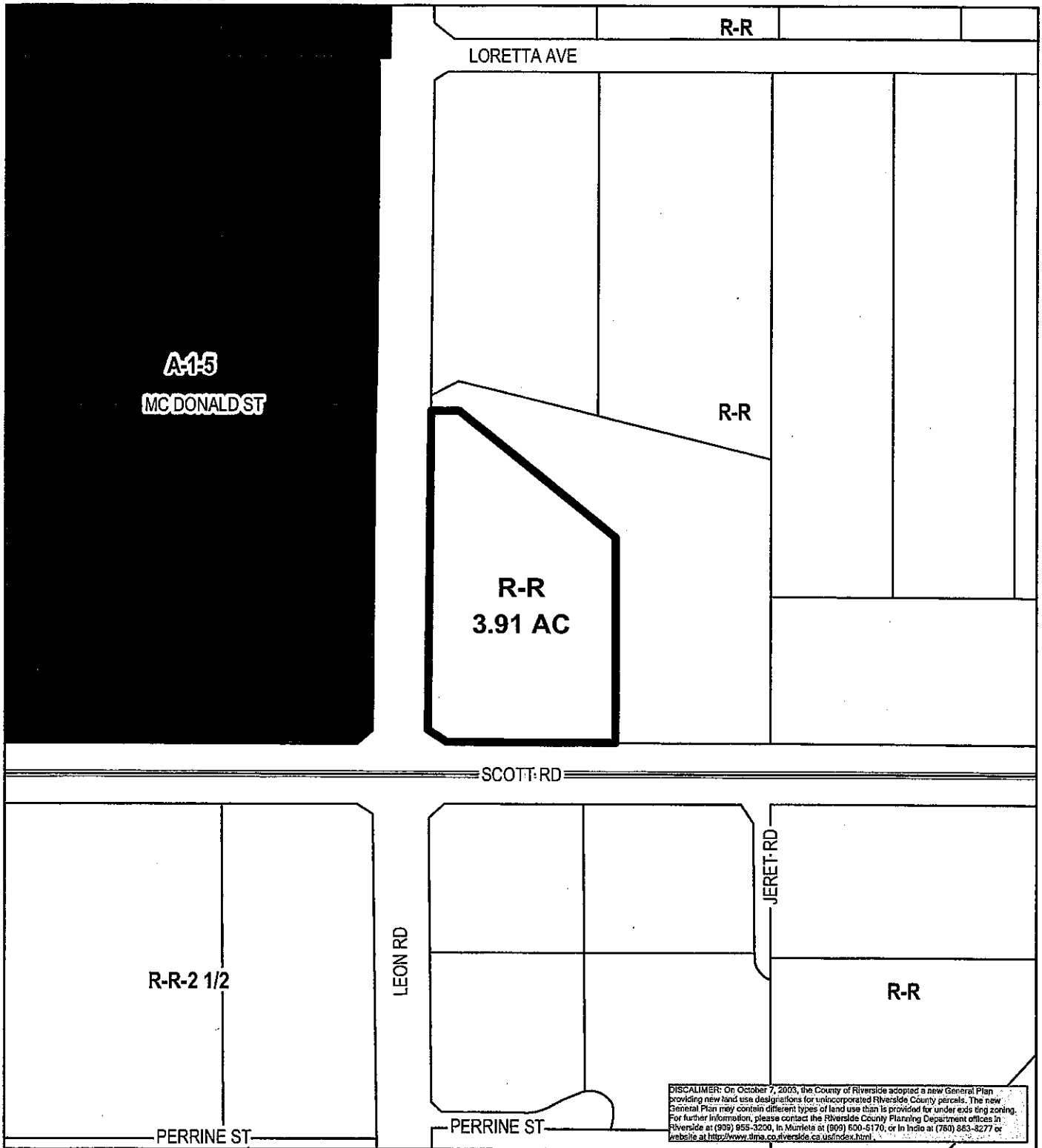


Supervisor Stone  
District 3  
Date Drawn: 2/15/08

# GPA00916

## EXISTING ZONING

Planner: Amy Aldana  
Date: 2/20/08  
Exhibit 2



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, in Murietta at (951) 500-5170, or in Indio at (760) 863-8277 or website at <http://www.time.co.riverside.ca.us/index.html>.

Zone  
Area: Winchester  
Township/Range: T6SR2W  
Section: 17

RIVERSIDE COUNTY PLANNING DEPARTMENT

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Supervisor Stone  
District 3  
Date Drawn: 2/15/08

# GPA00916

Land Use

Planner: Amy Aldana  
Date: 2/20/08  
Exhibit 1



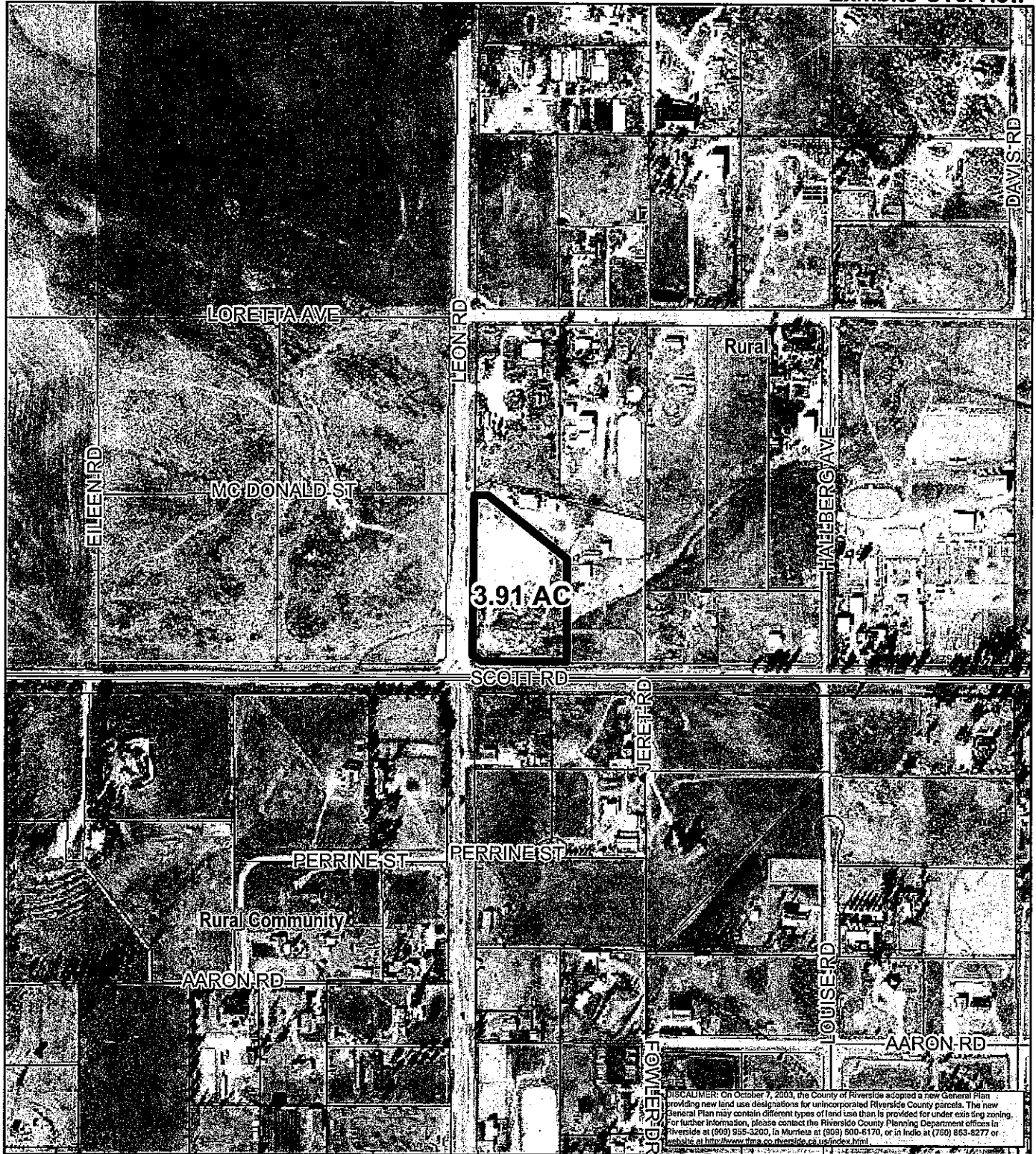
## RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone  
Area: Winchester  
Township/Range: T6SR2W  
Section: 17



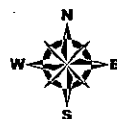
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**RIVERSIDE COUNTY PLANNING DEPARTMENT**

Area  
Plan: Winchester  
Township/Range: T6SR2W  
Section: 17

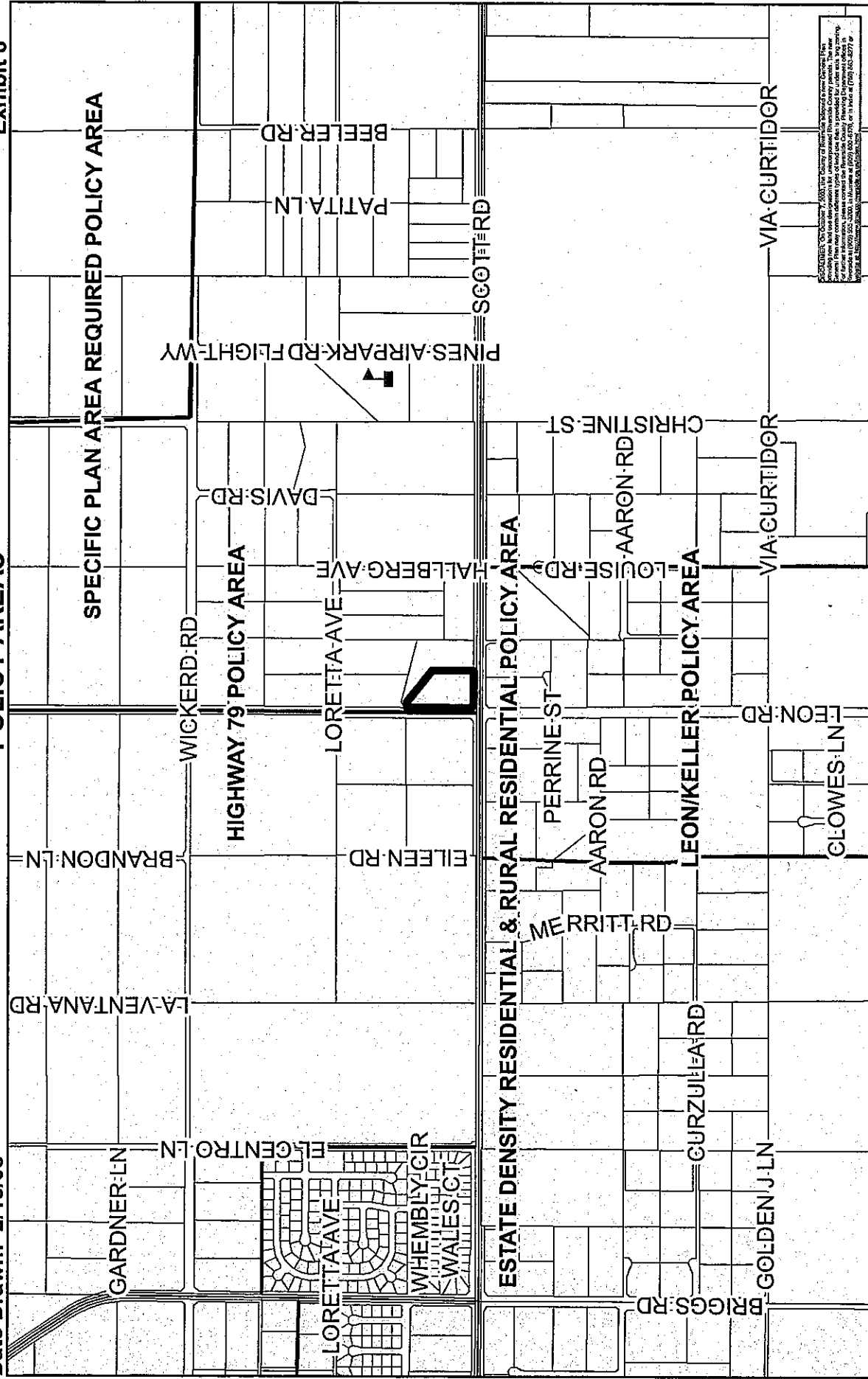


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Supervisor Stone  
District 3  
Date Drawn: 2/15/08

# GPA00916 POLICY AREAS

Planner: Amy Aldana  
Date: 2/20/08  
Exhibit 8

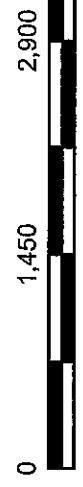


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Zone  
Area: Winchester  
Township/Range: T6SR2W  
Section : 17

## RIVERSIDE COUNTY PLANNING DEPARTMENT

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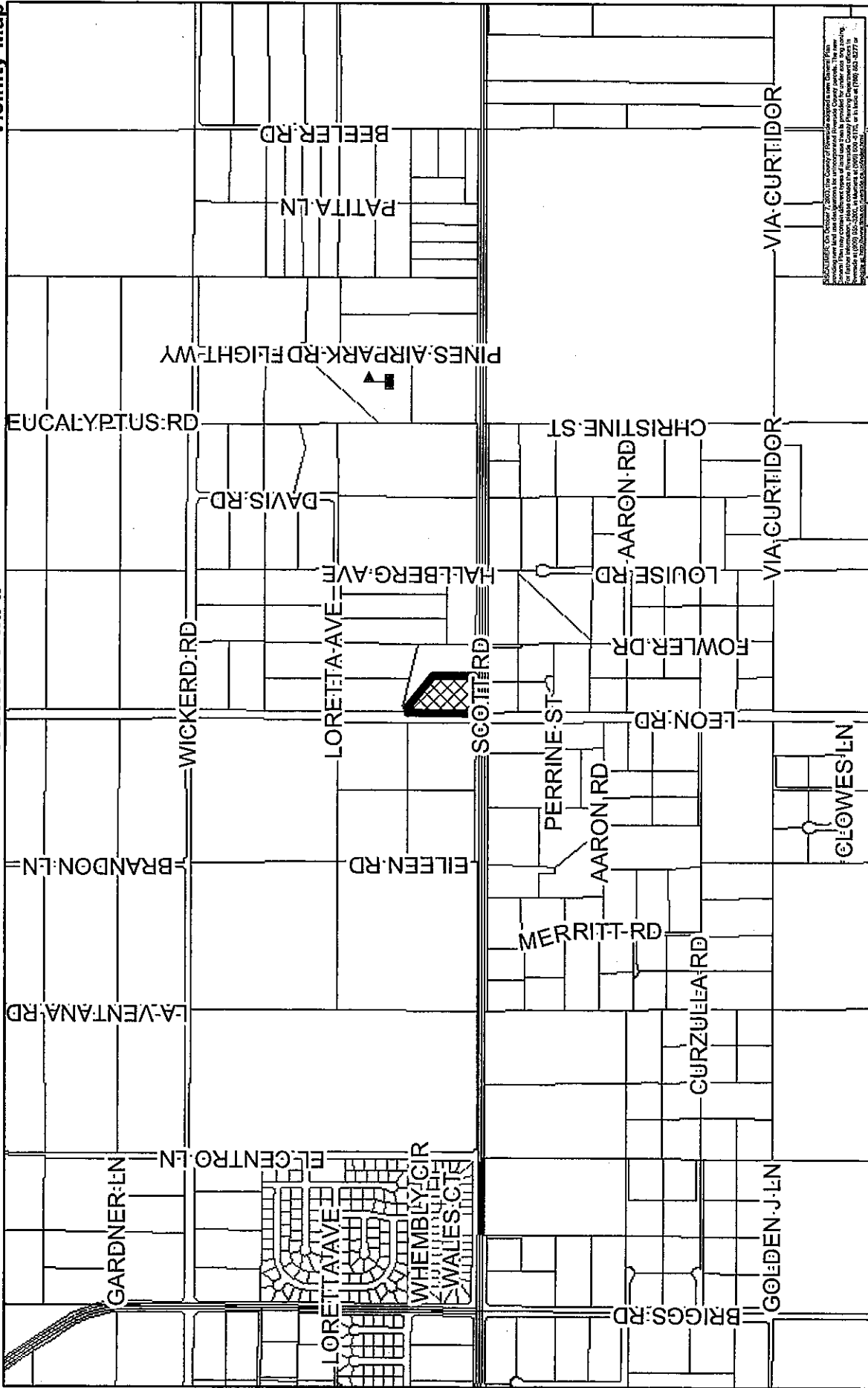
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Supervisor Stone  
District 3  
Date Drawn: 2/15/08

# GPA00916 VICINITY MAP

Planner: Amy Aldana  
Date: 2/20/08  
Vicinity Map

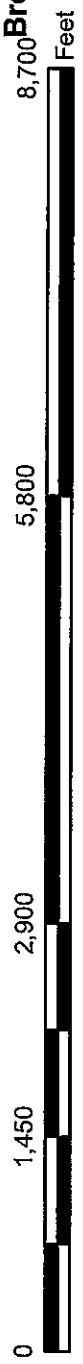


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Zone: Winchester  
Area: Winchester  
Township/Range: T6SR2W  
Section: 17

## RIVERSIDE COUNTY PLANNING DEPARTMENT

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**APPLICATION FOR AMENDMENT TO THE RIVERSIDE COUNTY GENERAL PLAN**

JUSTIFICATION FOR AMENDMENT (Please be specific. Attach more pages if needed.)

~~The property owner is the proprietor of a retail nursery and garden center (Louie's Nursery) who has been serving the horticultural and gardening need of residents in the Western Riverside County Area for three decades. The subject property is suitable for a new garden center location based on existing and planned development of the Menifee Valley and surrounding area. The project site is located at the intersection of an Urban Arterial Highway (Scott Road) and a Major Highway (Leon Road) in the mid-County area.~~

~~The subject property is suitable for new commercial development based on the Policies of the Riverside County General Plan for public facilities and land use compatibility. The 3.61 acre parcel is unsuitable for residential development. The proposed Designation of Commercial - Retail or other appropriate Category would not conflict with the overall Riverside County Vision nor would any General Plan inconsistency be created by the proposed Amendment.~~

**III. AMENDMENTS TO POLICIES:**

*(Note: A conference with Planning Department staff is required before application can be filed. Additional information may be required.)*

A. LOCATION IN TEXT OF THE GENERAL PLAN WHERE AMENDMENT WOULD OCCUR:

Element: \_\_\_\_\_ Area Plan: \_\_\_\_\_

B. EXISTING POLICY (If none, write "none." (Attach more pages if needed): \_\_\_\_\_

C. PROPOSED POLICY (Attach more pages if needed): \_\_\_\_\_

October 22, 2009

*VIA ELECTRONIC MAIL AND FACSIMILE*

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

**RE: Item 8.0, General Plan Amendment Initiation Proceedings  
(October 28, 2009)**

Dear Chair and Commission Members:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPA proposals.

Item 8.1, GPA 1086 (Highgrove)

*Concur with staff recommendation to initiate.* This amendment will utilize Community Development land more efficiently and provide for a range of housing types.

Item 8.2, GPA 1087 (Highgrove)

*No position.*

Item 8.3, GPA 1081 (Lake Mathews)

*Disagree with staff recommendation for initiation pending MSHCP analysis.* The staff report notes that the project is within MSHCP Criteria Cell 2028 but does not evaluate the effect of the change in land use upon MSHCP assembly. If such effect is neutral or positive, EHL would have no position on the amendment.

Item 8.4, GPA 1017/ A/B (Jurupa)

*No position.*

Item 8.5, GPA 1043 (Rancho California)

*Concur with staff recommendation to deny initiation.* This 629-acre property in rugged terrain is remote from infrastructure and services and is at high fire risk. Uses should not be intensified here. Furthermore, the Riverside County Fire Hazard Reduction Task Force made the following recommendation:

*Update the Riverside County General Plan and complete consistency zoning actions to limit residential growth within or adjacent to high fire hazard areas.*

As staff notes, the proposal would be inconsistent with the General Plan vision for the area, create internal inconsistencies in the General Plan, and reflects no changed circumstances.

Item 8.6, GPA 1038 (Lake Mathews)

*Disagree with staff recommendation to initiate, including as a modified project.* This is a massive proposal to redesignate 365 acres of intact Rural land to highly inefficient, greenhouse gas-intensive 2-acre estate lots. The staff-recommended modification would convert a portion of the site to such lots. Mostly surrounded by other Rural lands, such conversion would not reflect a substantial change in circumstances, and thus *does not meet* the criteria for a Foundation change. Staff's recommendation demonstrates a lack of commitment to the integrity of the Rural designations, and as in the case above, would grant a special *exception* for one applicant and set a precedent that would lead to progressive loss of Rural lands. *Furthermore, the staff report is highly deficient in failing to indicate whether MSHCP Criteria Cells are affected. Whether or not MSHCP assembly would be prejudiced by intensified uses is critical information, and such an analysis should be provided prior to consideration.*

Item 8.7, GPA 988 (Elsinore)

*Concur with staff recommendation to deny initiation.* This proposal responds to no changed circumstances to justify conversion of OS-R to RR. It would intensify residential uses within a remote and very high fire hazard area, contrary to the recommendation of the Fire Hazard Reduction Task Force. The current designation correctly reflects the viewshed and buffer characteristics of the area, and should not be altered. According to staff, "Increasing the intensity of uses on the site could also potentially create inconsistencies amongst the Land Use element and the Safety element of the General Plan."

Item 8.8, GPA 916 (Winchester)

*Concur with staff recommendation to deny initiation.* The site is outside the existing commercial core and no changed circumstances justify the proposal. As staff notes, future "Rural Commercial Policies" may apply, however.

Item 8.9, GPA 907 (Rancho California)

*NO CELLS*

*Disagree with staff recommendation for initiation pending MSHCP analysis.* The French Valley is a complex location for MSHCP assembly. The staff report does not analyze whether MSHCP assembly would be affected.

Item 8.10, GPA 903 (Rancho California)

CELL 5275

*Disagree with staff recommendation for initiation pending additional analysis.*  
There is no MSCHP analysis. There is also no evidence that additional commercial capacity is needed here or that this is the optimal location for new commercial that reduces vehicle miles traveled and consequent GHG emission for nearby communities.

In conclusion, we ask that you uphold the integrity of the Foundation System, the General Plan, and the MSHCP.

Sincerely,

Dan Silver, MD  
Executive Director

Electronic cc: Board Offices  
George Johnson, TLMA  
Ron Goldman, Planning Dept.

Carolyn Luna, EPD  
Interested parties