

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



2038


FROM: TLMA - Planning Department


SUBMITTAL DATE:
June 10, 2010

SUBJECT: GENERAL PLAN AMENDMENT No. 977 – Foundation-Regular – Applicant: Norman Gritton and Gritton & Gritton – Engineer/Representative: Dave Jeffers – Fifth Supervisorial District – Good Hope and Meadowbrook Zoning Area – Mead Valley and Elsinore Area Plan: Rural: Rural Mountainous (RUR: RM) (10 Acre Minimum Lot Size) and Rural: Rural Residential (RUR: RR) (5 Acre Minimum Lot Size) – Location: Northerly of Mountain Avenue, easterly of the City of Lake Elsinore and westerly of Highway 74 – 404.89 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 to Rural Community and to amend the land use designation of the subject site from Rural Mountainous (RUR:RM) (10 Acre Minimum Lot Size) and Rural Residential (RUR: RR) (5 Acre Minimum Lot Size) to Very Low Density Residential (RC: VLDR) (1 Acre Minimum Lot Size) – APN(s): 346-090-002, 346-090-004, 346-090-006, 346-200-004, 346-200-009 and 346-200-010

RECOMMENDED MOTION: The Planning Director recommends that the Board of Supervisors tentatively decline to adopt an order initiating proceedings for General Plan Amendment No. 977 from Rural: Rural Mountainous and Rural: Rural Residential to Rural Community: Very Low Density Residential. 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


Ron Goldman
Planning Director

Initials:
RG: 

(continued on attached page)

REVIEWED BY EXECUTIVE OFFICE

DATE: 6/14/2010
Tina Grandy

Departmental Concurrence

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

Prev. Agn. Ref.

District: Fifth

Agenda Number:

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 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 DECEMBER 2, 2009
RIVERSIDE COUNTY ADMINISTRATIVE CENTER**

I. AGENDA ITEM 5.5: GENERAL PLAN AMENDMENT NO. 977 - Foundation / Regular - Applicant: Norman Gritton and Gritton & Gritton - Engineer/Representative: Dave Jeffers - Fifth Supervisorial District - Good Hope and Meadowbrook Zoning Area - Mead Valley and Elsinore Area Plan: Rural: Rural Mountainous (RUR:RM) (10 Ac. Min), and Rural: Rural Residential (RUR:RR) (5 Acre Minimum) - Location: Northerly of Mountain Avenue, easterly of The City of Lake Elsinore, and westerly of Highway 74 - 404.89 Gross Acres - Zoning: Rural Residential (R-R) – APN9s): 346-090-002, 346-090-004, 346-090-006, 346-200-004, 346-200-009 and 346-200-010 - (Continued from 9/30/09 and 11/4/09).

II. PROJECT DESCRIPTION

This General Plan Amendment proposes to amend the General Plan Foundation Component of the subject site from Rural to Rural Community and to amend the land use designation of the subject site from Rural Mountainous (RUR:RM) (10 Acre Minimum) and Rural Residential (RUR:RR) (5 Acre Minimum) to Very Low Density Residential (RC:VLDR) (1 Acre Minimum).

III. MEETING SUMMARY

The subject proposal did not require a presentation.

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

The following spoke in opposition of the subject proposal:

Dave Jeffers, Applicant's Representative

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

IV. CONTROVERSIAL ISSUES

NONE

V. PLANNING COMMISSION ACTION

The Planning Commission, recommended to the Board of Supervisors;

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.

Agenda Item No.: 5.5
Area Plan: Elsinore & Mead Valley
Zoning District: Good Hope-Meadowbrook
Supervisory District: Fifth
Project Planner: Tamara Harrison
Planning Commission: December 2, 2009

General Plan Amendment No. 977
Applicant: Norman D. Gritton
Engineer/Representative: David Jeffers

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. 977 from Rural: Rural Mountainous and Rural Residential to Rural Community: Very Low Density Residential and the Planning Commission made the comments below. The Planning Director continues to recommend that the Board tentatively decline to adopt an order initiating proceedings for 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 agreed with staff that the Board of Supervisors should tentatively decline to initiate the proposal. Mr. Roth stated that the location of the subject site is topographically challenged, the site falls within several Multiple Species Habitat Conservation Plan criteria areas, it is devoid of infrastructure, and the site is also within a high fire area. Mr. Roth noted that if the case makes it back to the Planning Commission, the applicant is going to have a tough time justifying the proposal.

Commissioner John Snell: No Comments

Commissioner John Petty: No Comments

Commissioner Jim Porras: No Comments

Commissioner Jan Zuppardo: Commissioner Zuppardo indicated that the applicant faces a long and expensive process given the nature of the site and the proposal. Ms. Zuppardo stated that it would have been helpful if the applicant had met with the Environmental Programs Department prior to the December 2, 2009 Planning Commission meeting. Ms. Zuppardo recommended that the proposal be allowed to proceed to the Board of Supervisors, since the applicant has been warned of the issues that may arise during the review process.

Agenda Item No.: 5.5
Area Plan: Elsinore & Mead Valley
Zoning District: Good Hope- Meadowbrook
Supervisorial District: Fifth
Project Planner: Tamara Harrison
Planning Commission: December 2, 2009
Continued From: September 30, 2009

General Plan Amendment No. 977
Applicant: Norman D. Gritton, Gritton & Gritton
Engineer/Rep: Dave Jeffers Consulting

**COUNTY OF RIVERSIDE PLANNING DEPARTMENT
STAFF REPORT**

PROJECT DESCRIPTION AND LOCATION:

The applicant proposes to amend the General Plan Foundation and land use designation from "Rural: Rural Mountainous" (RUR:RM) (10 Acre Minimum Lot Size); "Rural: Rural Residential" (RUR:RR) (5 Acre Minimum Lot Size) and "Community Development: Very Low Density Residential" (CD: VLDR) (1 acre minimum Lot Size) to "Rural Community: Very Low Density Residential" (RC:VLDR) (1 Acre Minimum Lot Size) for an approximately 404.89-acre property. The project is located northerly of Mountain Avenue, southerly of Olive Avenue, easterly of Vista Avenue, and westerly of Highway 74.

FURTHER PLANNING CONSIDERATIONS:

November 17, 2009

This item was continued from the Planning Commission meeting on September 30, 2009 then again from the Planning Commission meeting on November 4, 2009 to allow the applicant an opportunity to further discuss the proposed amendment with County staff.

POTENTIAL ISSUES OF CONCERN:

This General Plan Amendment consists of six non-contiguous parcels and is divided by an Edison easement. The site is located within two communities, two area plans, and two city spheres of influence. The three northernmost parcels north of the Edison easement are located within the Mead Valley Area Plan, while the three southernmost parcels are located within the Elsinore Area Plan (see attached). The southern most parcels south of the Edison easement along with those parcels in the northwest portion of the site lie within the community of Meadowbrook, while the parcel to the northeast lies within the community of Good Hope (see attached).

Good Hope is known as a remote area defined by its rural and equestrian-oriented character. Highway 74 runs through this area, serving scattered commercial and industrial development. Parcels north of the Edison easement are also located within the Perris Sphere of Influence. The City's sphere map shows this area as being designated R-20,000, Single-Family Residential. This land use designation allows single-family dwelling units at a density of up to 2 units per acre in a semi-rural or agricultural setting.

The remaining parcels are located within the Elsinore Area Plan and the community of Meadowbrook. Meadowbrook includes some commercial and light industrial uses focused along Highway 74. However, the area is generally characterized by very low density residential development and vacant properties set amid rolling hills. The applicant is seeking Very Low Density Residential within the Rural Community Foundation. This designation allows 1 acre

lots, similar to the area south of the site; however, the area to the south lies within the Community Development Foundation.

The site is relatively isolated, and there are no Circulation Element Roads connecting the site directly to Highway 74, the area's main artery. The closest Circulation Element road is Meadowbrook Avenue, a Secondary Highway with a one hundred foot right of way, approximately ½ mile to the south of the site. Tract Map No. 32022 (TR32022), submitted in March of 2005, is currently in process with the Planning Department to the east of the site. The applicant's engineer has indicated that this may provide for improved access to the site. Currently, water and sewer lines are approximately 1 mile away from the subject site.

The parcels south of the Edison easement are also located within the Lake Elsinore Sphere of Influence. The City's sphere map identifies this area as Mountainous (1 dwelling unit per ten acres) and Low Density Residential (3 dwelling units per acre). These parcels are adjacent to, and easterly of, the North Peak Specific Plan, located within the City of Lake Elsinore. This specific plan was to be developed for residential and commercial uses, with the commercial uses closer to Highway 74. According to the City of Elsinore's planning staff, the developer stopped work on it, and the Regional Conservation Authority of Western Riverside County has acquired the area immediately west of the site for conservation.

The subject site falls into a number of Criteria Cells of the County's Multiple Species Habitat Conservation Plan (MSHCP) and will likely require conservation of some areas. The southwest portion of the site falls within Criteria Cell #3667, where conservation focuses on riparian scrub, woodland and forest habitat and adjacent coastal sage scrub, chaparral and grassland habitat. Conservation here will be connected to chaparral, coastal sage scrub, riparian scrub, woodland and forest habitat proposed for conservation in Cell #3670 to the west and to coastal sage scrub habitat proposed for conservation in Cell Group J to the north. According to the plan, conservation within Cell #3667 will range from 75%-85% of the Cell, focusing on the western and eastern central portions of the Cell. Increasing the density/intensity of allowable land use on the site, as proposed by this amendment, would exacerbate potentially conflicts between such uses and the conservation requirements set forth in the MSHCP, causing inconsistencies between the Land Use Element and the Multi-Purpose Open Space Element of the General Plan.

The site's northern parcels fall within Cell Group J and Cell #3473. These two parcels are also separated by Public/Quasi Public Conserved Lands. Conservation within Cell Group J focuses on the assembly of coastal sage scrub habitat to the west and chaparral habitat to the east. Those areas ultimately conserved within this Cell Group J will be connected to conserved areas within Cell #3667 to the south and Cell #3473 to the north. According to the plan, conservation within this Cell Group will range from 55%-65% focusing on the eastern portion and the western edge. Again, increasing the density/intensity of allowable land use on the site, as proposed by this amendment, would exacerbate potentially conflicts between such uses and the conservation requirements set forth in the MSHCP, causing inconsistencies between the Land Use Element and the Multi-Purpose Open Space Element of the General Plan.

According to the General Plan, much of the area has a high susceptibility to wild land fires, including the parcels in question. There are no fire stations in the vicinity, and water is now approximately 1 mile away on Peach Street. The site is also characterized by steep slopes. The Safety Element of the General Plan addresses fire hazards in a number of ways including

detering building in those "high risk" areas and providing secondary public access to the site. Currently, the site has limited access. Increasing the density for the site would expose potential dwellings to fire hazards and create an internal inconsistency between the Land Use Element/Map and the Safety Element of the general plan.

A number of water courses cross the site, and portions of the southern parcels are subject to Flood Plain review. Changes in density for the site may potentially harm or alter the existing water courses and/or expose potential dwellings to flood hazard, creating additional inconsistencies amongst the elements of the General Plan, particularly the Safety Element.

In summary, there is no substantial evidence that new conditions or circumstances have occurred in the area since the adoption of the General Plan in 2003 to justify the proposed change. No new infrastructure has been extended to the area: the nearest Circulation Element road is approximately ½ mile away; the nearest sewer or water line is approximately 1 mile away; and there are no fire stations in the vicinity, although the site is located in a high fire area. This amendment would potentially create inconsistency between the Land Use Element and the Safety Element by increasing density in an area with steep slopes, high fire hazard and no nearby fire stations, limited access, and subject to flooding. Increasing the density/intensity of allowable land use on the site, as proposed by this amendment, would also exacerbate potentially conflicts between such uses and the conservation requirements as set forth in the MSHCP, causing inconsistencies between the Land Use Element and the Multi-Purpose Open Space Element of the General Plan.

RECOMMENDATIONS:

The Planning Director's recommendation is to tentatively decline to adopt an order initiating proceedings for General Plan Amendment No. 977 from Rural: Rural Mountainous and Rural: Rural Residential to Rural Community: Very Low Density Residential. 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 February 14, 2008.
2. Deposit Based Fees charged for this project as of the time of staff report preparation, total \$4,222.23.
3. The project site is currently designated as Assessor's Parcel Numbers 346-090-002, 346-090-004, 346-090-006, 346-200-004, 346-200-009 and 346-200-010.

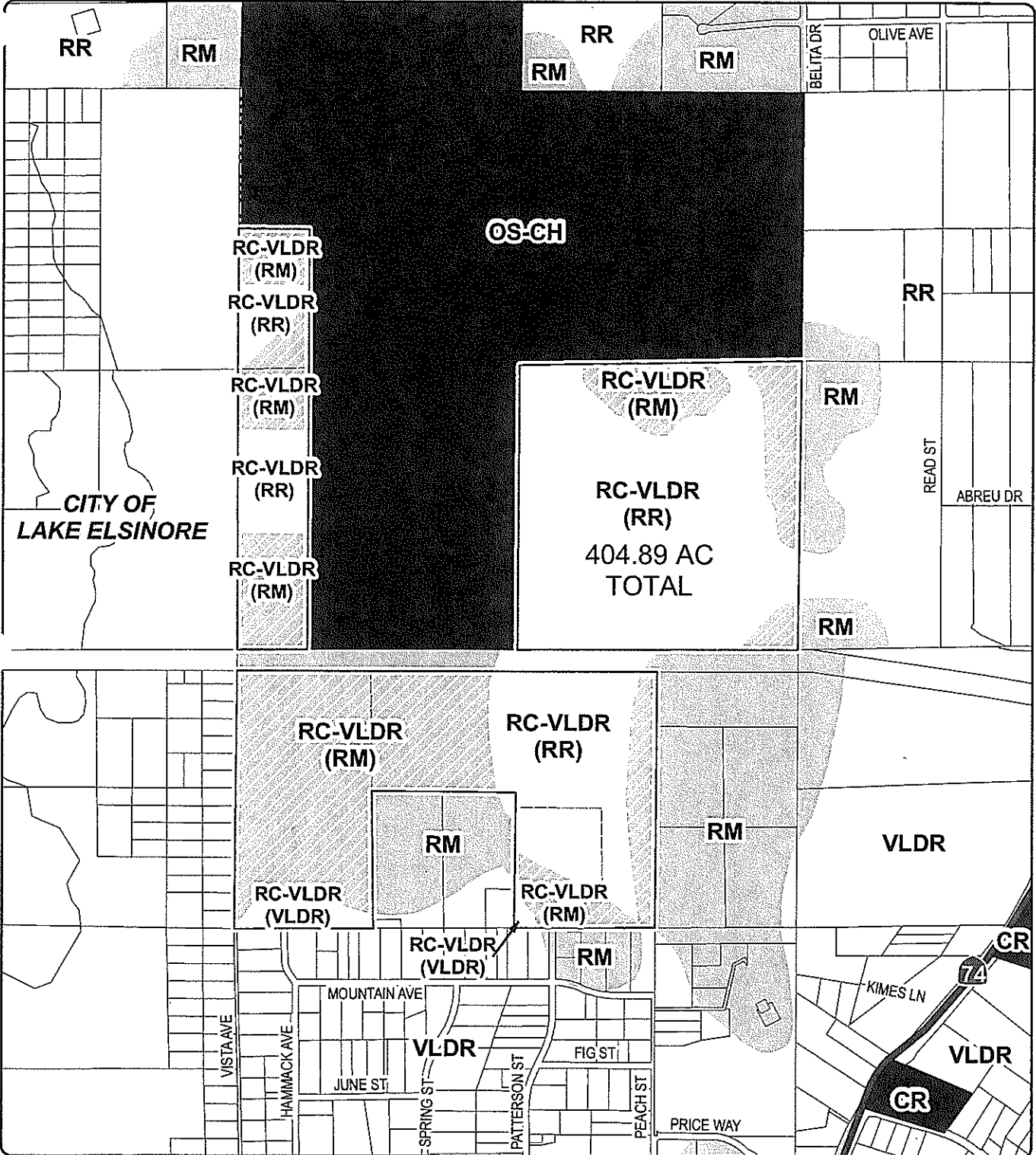
RIVERSIDE COUNTY PLANNING DEPARTMENT

GPA00977

PROPOSED GENERAL PLAN

Supervisor Ashley
District: 5

Date Drawn: 8/26/09
Exhibit 6



Zoning Area: Good Hope & Meadowbrook
Township/Range: T5SR4W
Section: 9 & 16

Assessors Bk. Pg. 346-9, 20
Thomas Bros. Pg. 836 H2
Edition 2009



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>

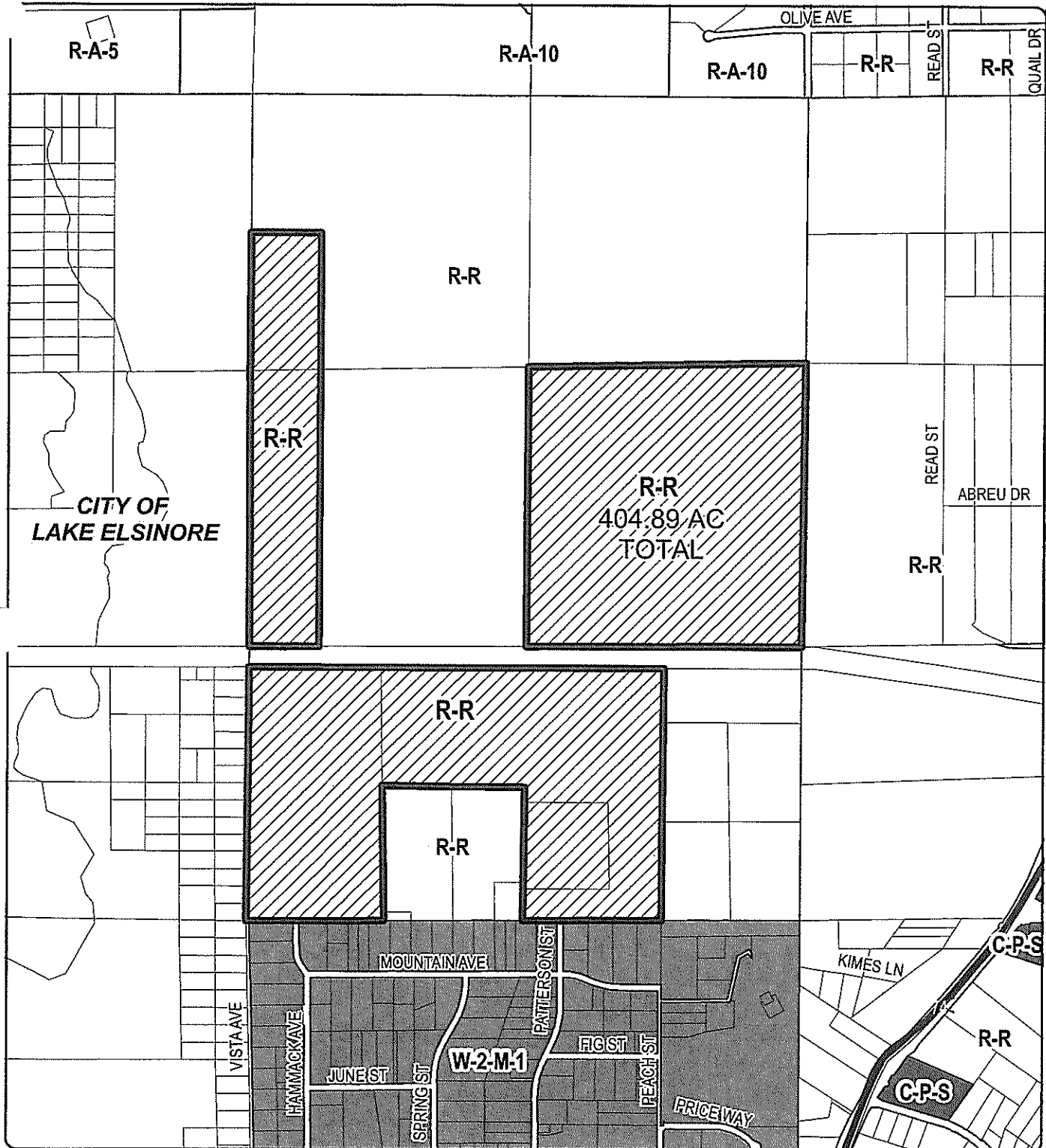
RIVERSIDE COUNTY PLANNING DEPARTMENT

GPA0077

EXISTING ZONING

Supervisor Ashley
District 5

Date Drawn: 8/26/09
Exhibit 2



Zoning Area: Good Hope & Meadowbrook
Township/Range: T5SR4W
Section : 9 & 16

Assessors Bk. Pg. 346-9, 20
Thomas Bros. Pg. 836 H2
Edition 2009

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RIVERSIDE COUNTY PLANNING DEPARTMENT

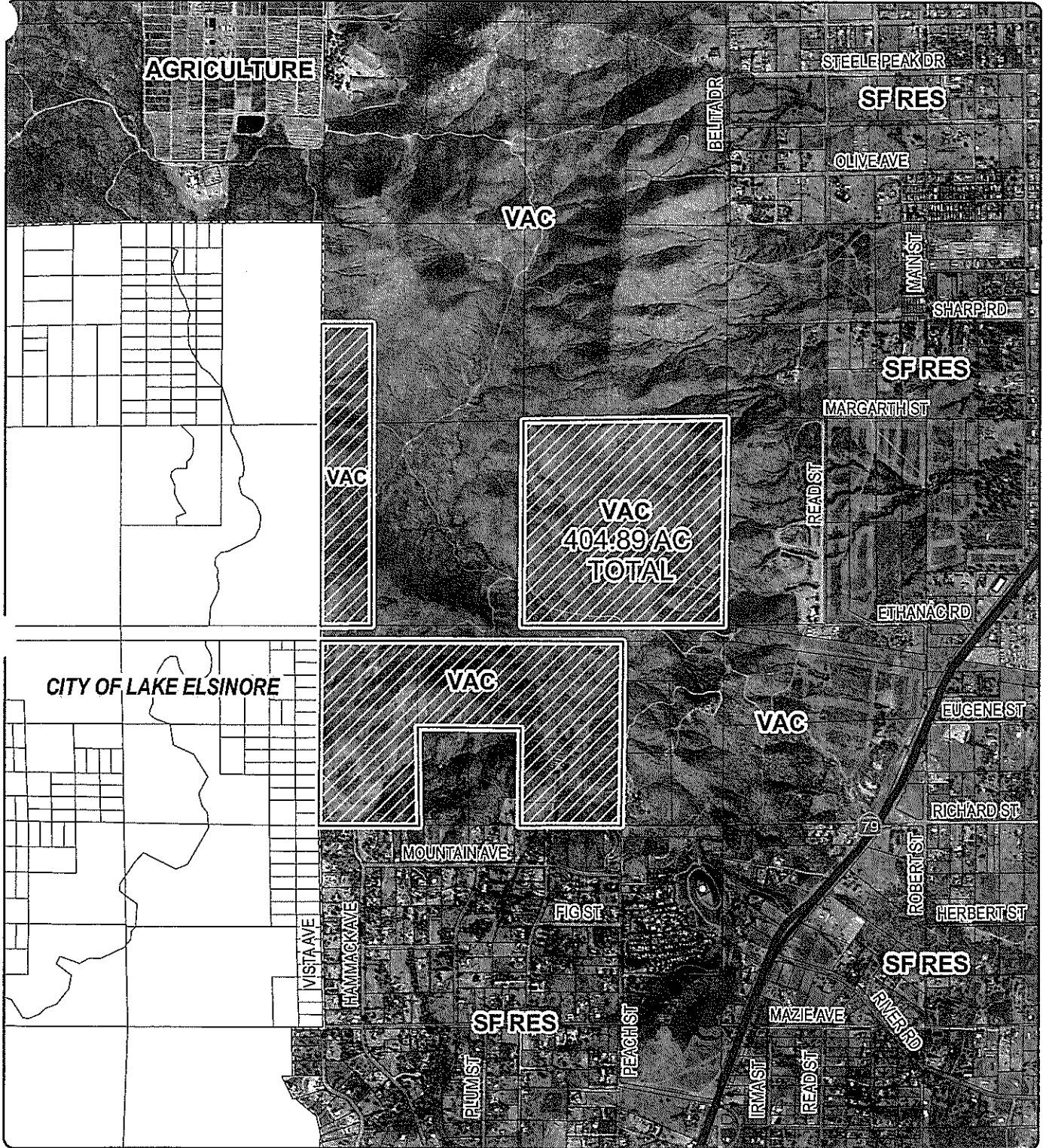
GPA00977

Supervisor Ashley
District 5

Date Drawn: 8/26/09

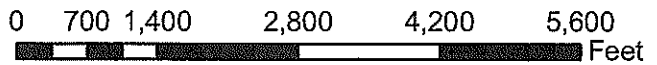
Exhibit 1

LAND USE



Zoning Area: Good Hope & Meadowbrook
Township/Range: T5SR4W
Section: 9 & 16

Assessors Bk. Pg. 346-9, 20
Thomas Bros. Pg. 836 H2
Edition 2009



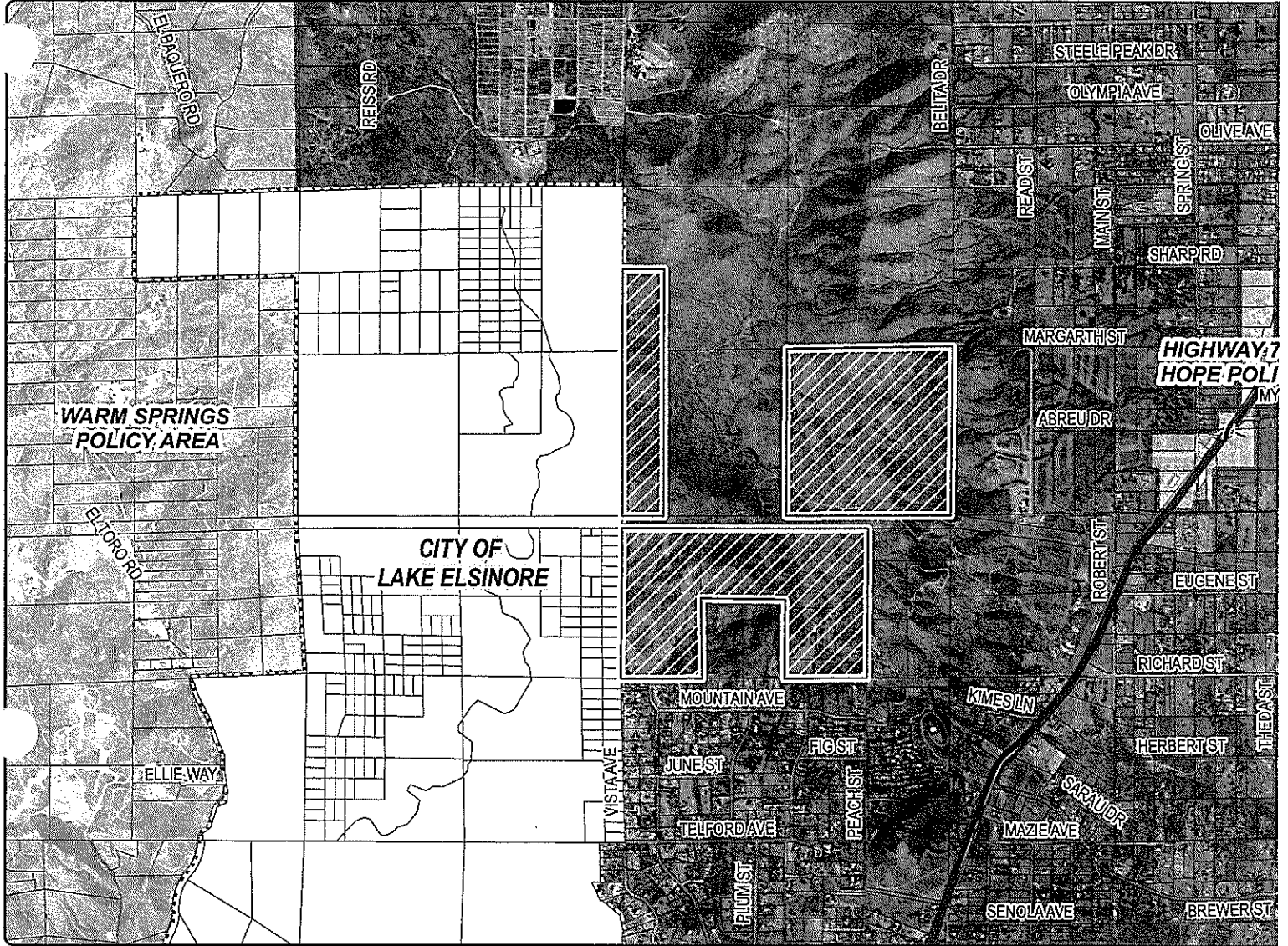
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RIVERSIDE COUNTY PLANNING DEPARTMENT

GPA00977

VICINITY/POLICY AREAS

Supervisor Ashley
District 5

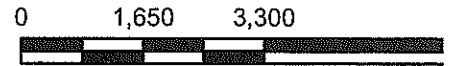


Zoning Area: Good Hope & Meadowbrook

Township/Range: T5SR4W

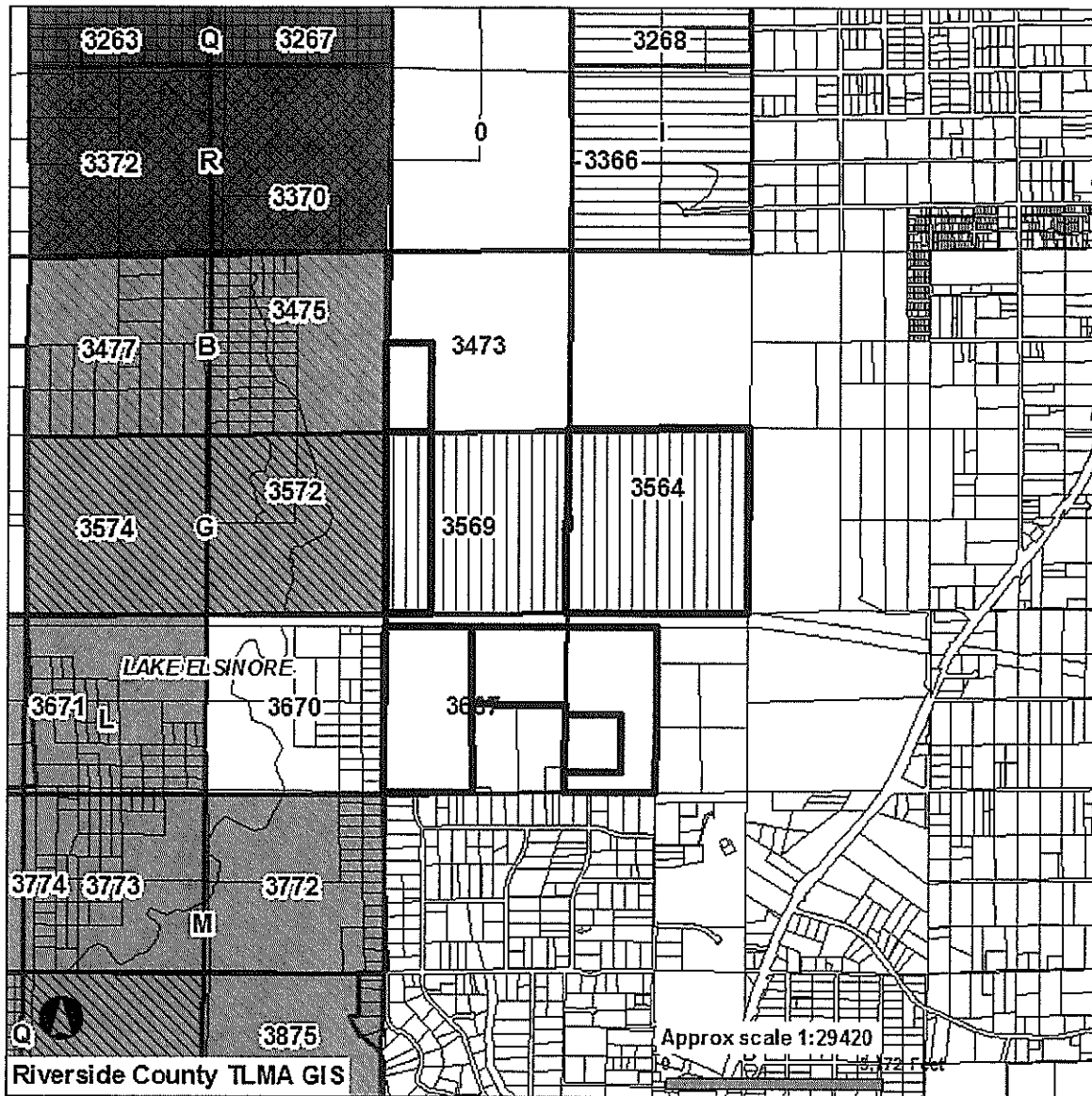
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RIVERSIDE COUNTY GIS



Selected parcel(s):

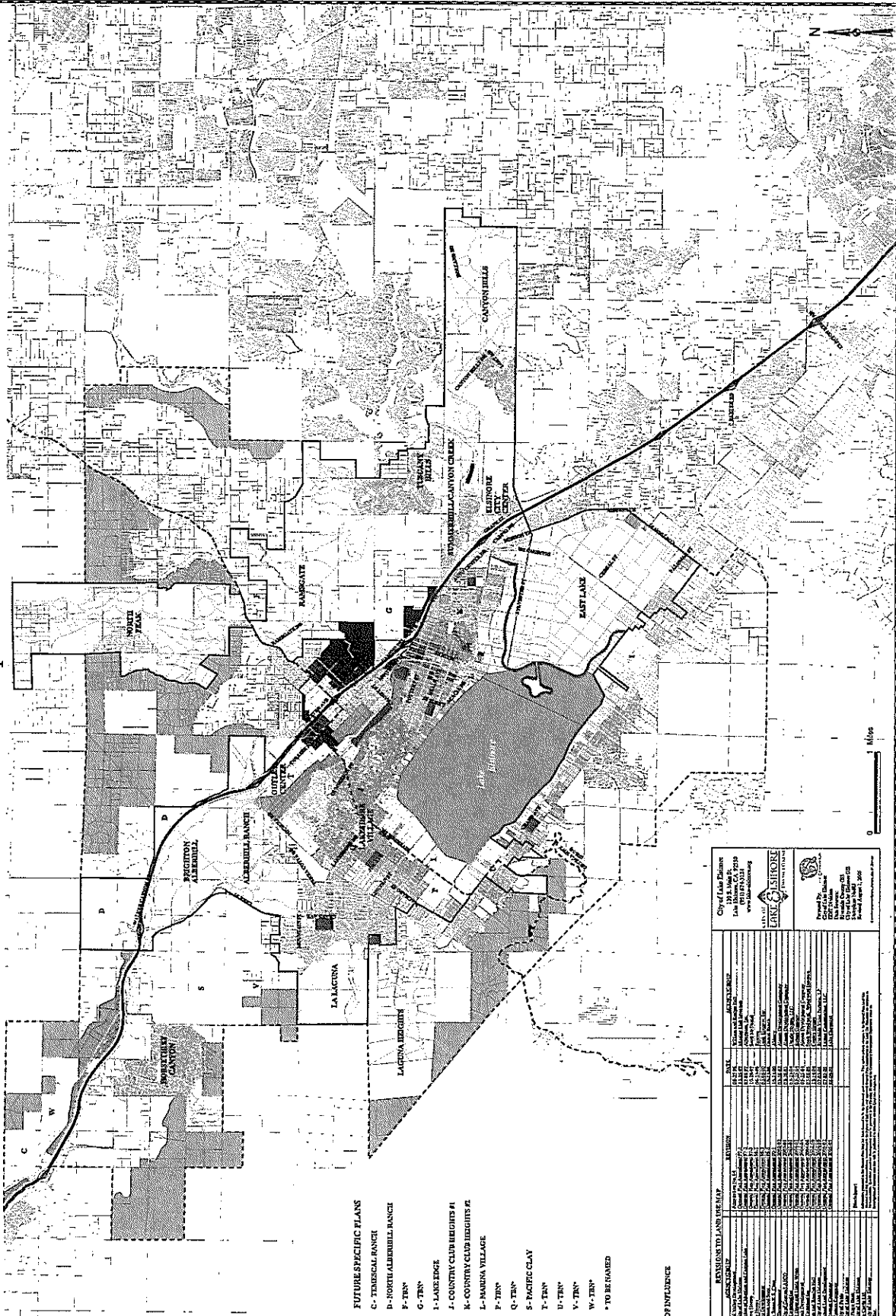
346-090-002 346-090-004 346-090-006 346-200-004 346-200-009 346-200-010

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 Department or Agency if necessary. Reference to recorded documents and public records may be necessary and is advisable.

REPORT PRINTED ON...Wed Sep 02 09:04:42 2009

City of Lake Elsinore General Plan Land Use Map



- LAND USE DESIGNATIONS**
- MOUNTAINS
 - UNDESIGNED DENSITY
 - 40% MEDIUM DENSITY
 - 35% MEDIUM DENSITY
 - 30% MEDIUM DENSITY
 - 25% MEDIUM DENSITY
 - 20% MEDIUM DENSITY
 - 15% MEDIUM DENSITY
 - HIGH DENSITY
 - MEDIUM DENSITY
 - NEIGHBORHOOD COMMERCIAL
 - GENERAL COMMERCIAL
 - TOURIST COMMERCIAL
 - COMMERCIAL OFFICE
 - FREEWAY BUSINESS
 - BUSINESS PARK
 - LIMITED INDUSTRIAL
 - OTHER RECREATION
 - PUBLIC INSTITUTIONAL
 - STADIUM
 - APPROVED SPECIFIC PLAN
 - FUTURE SPECIFIC PLAN
 - LAKE ELSINORE
 - CITY OF LAKE ELSINORE SPHERE OF INFLUENCE
 - CITY BOUNDARY
- FUTURE SPECIFIC PLANS**
- C - TERESA RANCH
 - D - NORTH ALBERHILL BANCH
 - F - TEN
 - G - TEN
 - J - LAKE EDGE
 - K - COUNTRY CLUB HEIGHTS #1
 - L - MARIANA VILLAGE
 - P - TEN
 - Q - TEN
 - S - PACIFIC CLAY
 - T - TEN
 - U - TEN
 - V - TEN
 - W - TEN
 - * TO BE DRAFTED

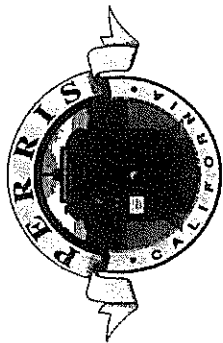
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LAKE ELSINORE	04/28/15	79. Revised Designation	[Signature]
LAKE ELSINORE	06/28/15	80. Revised Designation	[Signature]

City of Lake Elsinore
14400 Lake Elsinore, CA 92530
www.lakeelsinore.org

LAKE ELSINORE
CITY OF LAKE ELSINORE

Printed By: [Name]
City of Lake Elsinore
14400 Lake Elsinore, CA 92530
Date of Print: [Date]
Scale: 1" = 1 Mile

City of Perris General Plan



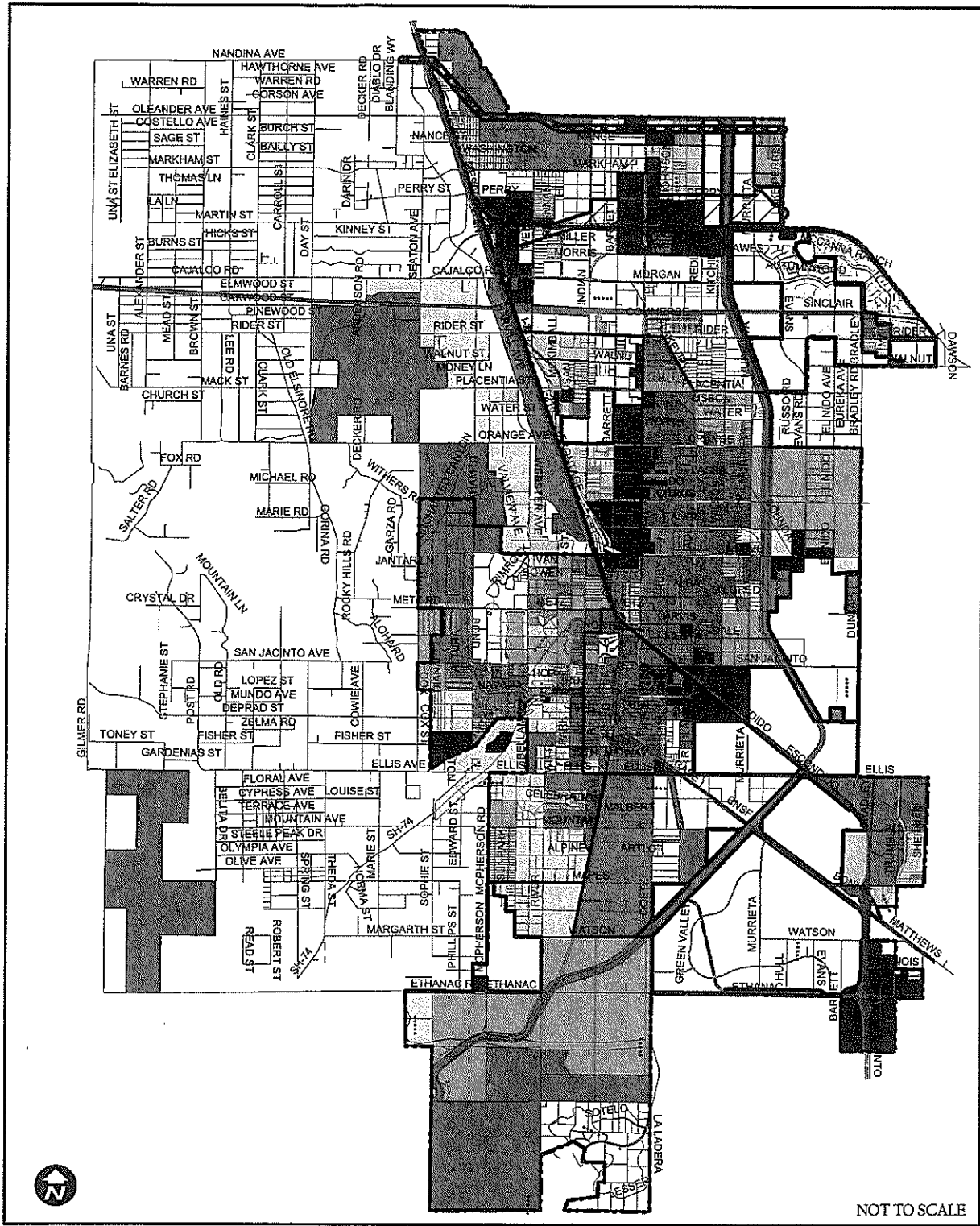
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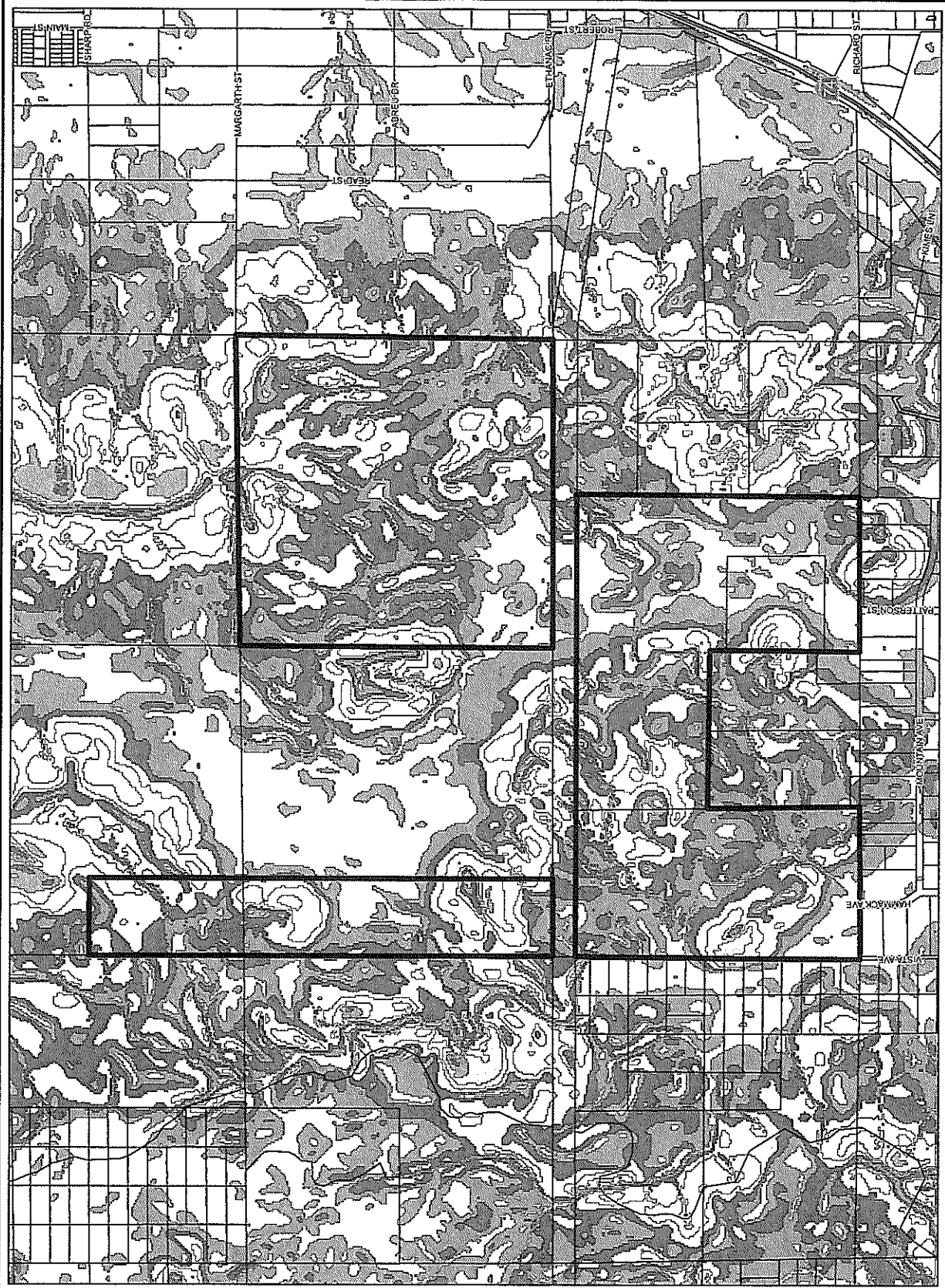
RESIDENTIAL	R-20000	R-10000	R-8400	R-7200	R-6000	MR-14	MR-22	
COMMERCIAL	NCER - Neighborhood Commercial (Neighborhood)	NC - Neighborhood Commercial	CC - Community Commercial	IO - Institutional Office	INDUSTRIAL	IO - Business Park	II - Light Industrial	GI - General Industrial
OTHER DESIGNATIONS	SP - Special Plan	OS - Public/Institutional/State and Open Space	P - Public State Public Facilities/Utilities	SA - Special Study Overlay	City boundary			

Land Use Map

Land Use Designations

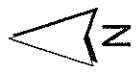
26, April 2005
City Council Approved





GPA977

Slope Analysis



Scale 1" = 800'
 0 200 400 800 1,200 Feet

- 5%
- 10%
- 15%
- 20%
- 25%
- 30%
- 35%
- 40%
- 45%

- GPA 977 Boundary
- Parcel Lines
- Highways

University of Maryland System
 Center for Geospatial Information Systems (GIS)
 Date: March 26, 2009

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

Justification for Amendment: (attachment to page 5 of 8)

APNs: 346-090-002, 346-090-004, 346-090-006, 346-200-004, 346-200-009 & 346-200-010.

The subject site is an assemblage of 6 parcels totaling approximately 400 acres of land located in the Meadowbrook area of the County adjacent to the City of Lake Elsinore on the west. The owners of the assemblage feel that, over the last several years, the area has slowly changed from a very rural area to smaller lot rural subdivisions such as the adjacent properties to the south where 40,000 s.f. lots exist.

Because of the natural terrain, it is anticipated that the future lotting layouts would show a minimum lot size of 40,000 square feet (with 1 acre zoning) in the flatter areas of the site while those lots in the hilly areas would be larger than 40,000 s.f. Some of the proposed lots could be up to 5 acres in size.

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



September 26, 2009

VIA ELECTRONIC MAIL AND FACSIMILE

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

**RE: Item 9.0, General Plan Amendment Initiation Proceedings
(September 30, 2009)**

Dear Chair and Commission Members:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPA proposals. In all cases, we commend the staff recommendations for upholding the planning integrity of the General Plan, for following the directives of the Administrative Element, and in respecting public safety and MSHCP imperatives.

Item 9.1, GPA 780 (Elsinore)

Concur with staff recommendation to deny initiation. There are numerous compelling reasons to deny this complex proposal, which responds to no changed circumstances. It would markedly intensify residential uses in an intrinsically unsafe high fire hazard area, whose emergency egress route – Highway 74 – is already severely challenged. The lack of proper secondary access cannot be mitigated, and the proposal is opposite to the recommendation of the Riverside County Fire Hazard Reduction Task Force:

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

As the cogent staff report demonstrates, if land currently designated as Open Space-Conservation Habitat needs redesignation on technical grounds, alternative designations such as Rural Mountainous or Open Space-Rural that are more appropriate are available, and future development could still be consolidated via clustering. Furthermore, the loss of Public/Quasi Public MSHCP lands under the exchange scenario creates General Plan and MSHCP inconsistencies. Finally, such intensification in a relatively remote area is inconsistent with the General Plan Vision of avoiding leapfrog development away from services. Indeed, the General Plan Advisory Committee rejected a Rural Village Overlay for El Cariso for all these reasons

Item 9.2. GPA 1033 (SWAP)

Concur with recommendation in staff report to deny initiation. This proposal to extend the Citrus Vineyard Policy Area to Vail Lake is wholly unsuited for this locale. As pointed out in the thorough staff report, it would introduce a type and intensity of development far in excess of that anticipated by the General Plan's Vail Lake Policy Area and the policies of SWAP. The small farm and commercial development model of Citrus Vineyard has no relevance to the biological, viewshed, and recreational imperatives of Vail Lake. No changed circumstances justify this wholesale change. A massive upzoning to 2-acre lots would introduce large scale residential uses into a high fire hazard area, decimate the biological resources needed for MSCHP assembly, and constitute a leapfrog pattern of development apart from services and infrastructure. Finally, according to the Planning Department, "The proposed amendment also creates an internal inconsistency among the Elements of the General Plan, particularly the Multipurpose Open Space Element and the Safety Element."

Item 9.3. GPA 1000 (SWAP)

Concur with staff recommendation to deny initiation. Conversion of this 379-acre rural location to Community Development/Specific Plan would defy all relevant planning principles. It would urbanize an intact rural area discontinuous from urban infrastructure and services, maximize greenhouse gas emissions, and, contrary to the recommendation of the Fire Hazard Reduction Task Force, place development in a rugged, high fire hazard location. No new circumstance justifies this Foundation change, which would thus conflict with the Administrative Element of the General Plan. According to the staff report, this increase in intensity "would be contrary to the existing character and land use pattern in the area."

Item 9.4. GPA 988 (Elsinore)

Concur with staff recommendation to deny initiation. This proposal responds to no changed circumstances. It would intensify residential uses within a 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 9.5. GPA 985 (Elsinore)

Concur with staff recommendation to deny initiation. This constrained site has serious and unresolved flood hazard issues, and the claim to provide needed affordable housing does not stand up to scrutiny, as documented in the staff report. Furthermore, the change would likely interfere with MSCHP assembly and should not proceed unless and until facilitation of a reserve segment can be documented.

Item 9.6. GPA 977 (Mead Valley/Elsinore)

Concur with staff recommendation to deny initiation. This is a massive proposal to redesignate 405 acres of Rural Mountainous and Rural Residential to Rural Community 1-acre lots. Discontiguous from infrastructure and services, and not responding to changed circumstances, the proposal utterly lacks planning merit. Indeed, due to public safety and MSHCP conflicts, staff concluded that:

This amendment would potentially create inconsistency between the Land Use Element and the Safety Element by increasing density in an area with steep slopes, high fire hazard and no nearby fire stations, limited access, and subject to flooding. Increasing the density/intensity of allowable land use on the site, as proposed by this amendment, would also exacerbate potentially conflicts between such uses and the conservation requirements as set forth in the MSHCP, causing inconsistencies between the Land Use Element and the Multi-Purpose Open Space Element of the General Plan.

Item 9.7. GPA 924 (Mead Valley)

Concur with staff recommendation to deny initiation.

Item 9.8. GPA 958 (Mead Valley)

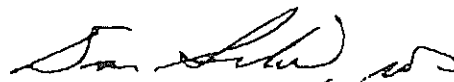
Concur with recommendation in staff report to deny initiation. The proposed change from Rural to Rural Community does not respond to new circumstances and would create a "spot zone."

Item 9.9. GPA 1084 (Jurupa)

Concur with staff recommendation to initiate.

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 Offices
George Johnson, TLMA
Ron Goldman, Planning Dept.

Carolyn Luna, EPD
Interested parties

Gritton and Gritton
c/o Norman Gritton
27245 Highway 74
Perris, CA 92570

David Jeffers Consulting
c/o David Jeffers
19 Spectrum Pointe Drive, Suite 609
Lake Forest, CA 92630

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