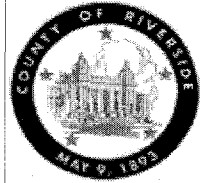


SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

326 B



FROM: TLMA - Planning Department

SUBMITTAL DATE:
June 17, 2010

SUBJECT: GENERAL PLAN AMENDMENT NO. 985 – Foundation-Regular – Applicant: Bob Taghdhiri – Engineer/Representative: Grant Becklund - First Supervisorial District - Lakeland Village Zoning District - Elsinore Area Plan: Open Space: Open Space Conservation (OS-C) – Location: North easterly of Grand Avenue, westerly of Turtle Dove Drive/Lucerne Street, and southerly and easterly of the City of Lake Elsinore. - 34.14 Gross Acres - Zoning: Watercourse, Watershed and Conservation Area (W-1) - **REQUEST:** This General Plan Amendment proposes to amend General Plan Foundation Component of the subject site from Open Space to Community Development to amend the General Plan Land Use designation of the subject site from Open Space Conservation (OS-C) to Medium High Density Residential (CD:MHDR) (allowing 5-8 dwelling units per acre) - APN(s): 371-090-003, 371-090-004, and 371-150-009

RECOMMENDED MOTION: The Planning Director recommends that the Board of Supervisors adopt an order initiating proceedings for General Plan Amendment No. 985 as modified by staff and as shown in Exhibit 7, 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

Jerry Jolliffe, Deputy Planning Director for,

Jerry Jolliffe
Ron Goldman
Planning Director

Initials:
RG:th *peh*

(continued on attached page)

REVIEWED BY EXECUTIVE OFFICE

DATE

6/23/10 *RM*

Tina Grande

Departmental Concurrence

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

Prev. Agn. Ref.

District: First

Agenda Number:

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 5.2: GENERAL PLAN AMENDMENT NO. 985** - Foundation / Regular - Applicant: Bob Taghdiri - Engineer/Representative: Grant Becklund - First Supervisorial District - Lakeland Village and South Elsinore Zoning Areas - Elsinore Area Plan: Open Space-Conservation- Location: Northerly of Grand Avenue, easterly of Russell Street, southerly of Como Street, and westerly of Lucerne Street - 34.14 Gross Acres - Zoning: Regulated Development Areas (R-D) and Watercourse, Watershed & Conservation Areas (W-1) - APNs: 371-090-003, 371-090-004 and 371-150-009 - (Continued from 6/24/09, 7/22/09 and 9/30/09)

II. **PROJECT DESCRIPTION**

The General Plan Amendment proposes to amend the General Plan from Open Space-Conservation (OS:C) to Community Development: Medium High Density Residential (CD:MHDR) (5-8 Dwelling Units Per Acre).

III. **MEETING SUMMARY**

The following staff presented the subject proposal:

Project Planner, Mike Harrod, at (951) 955-1881 or E-mail mharrod@rctlma.org.

The following spoke in favor of the subject proposal:

Grant Beckly, Applicant's Representative, 30811 Garbani Road, Winchester, California 92596

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 commented on the General Plan Amendment. If you wish to listen to the entire discussion, see Section VI below. Additionally, the comments of individual Commissioners are summarized in the Planning Director's Report and Recommendation 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.

**PLANNING COMMISSION
MINUTE ORDER SEPTEMBER 30, 2009
RIVERSIDE COUNTY ADMINISTRATIVE CENTER**

- I. AGENDA ITEM 9.5: GENERAL PLAN AMENDMENT NO. 985** - Foundation / Regular - Applicant: Bob Taghdiri - Engineer/Representative: Grant Becklund - First Supervisorial District - Lakeland Village and South Elsinore Zoning Areas - Elsinore Area Plan: Open Space-Conservation- Location: Northerly of Grand Avenue, easterly of Russell Street, southerly of Como Street, and westerly of Lucerne Street - 34.14 Gross Acres - Zoning: Regulated Development Areas (R-D) and Watercourse, Watershed & Conservation Areas (W-1) - APNs: 3721-090-003, 371-090-004 and 371-150-009 - (Continued from 6/24/09 and 7/22/09)
- II. PROJECT DESCRIPTION**
The General Plan Amendment proposes to amend the General Plan from Open Space-Conservation (OS:C) to Community Development: Medium High Density Residential (CD:MHDR) (5-8 Dwelling Units Per Acre).
- III. MEETING SUMMARY**
The following staff presented the subject proposal:
Project Planner, Tamara Harrison at 951-955-9721 or e-mail tharriso@rcctlma.org.
- No one spoke in favor, neutral or in opposition of the subject proposal.
- IV. CONTROVERSIAL ISSUES**
NONE
- V. PLANNING COMMISSION ACTION**
The Planning Commission, continued the subject proposal to December 2, 2009.
- 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@rcctlma.org.

**PLANNING COMMISSION
MINUTE ORDER JULY 22, 2009
RIVERSIDE COUNTY ADMINISTRATIVE CENTER**

I. **AGENDA ITEM 7.7: GENERAL PLAN AMENDMENT NO. 985** – Foundation-Regular – Applicant: Bob Taghdiri – Engineer/Representative: Grant Becklund - First Supervisorial District – Lakeland Village and South Elsinore Zoning Areas - Elsinore Area Plan: Open Space-Conservation– Location: Northerly of Grand Avenue, easterly of Russell Street, southerly of Como Street, and westerly of Lucerne Street - 34.14 Gross Acres - Zoning: Regulated Development Areas (R-D) and Watercourse, Watershed & Conservation Areas (W-1) - APN(s): 3721-090-003, 371-090-004, 371-150-009. (Continued from 6/24/09).

II. **PROJECT DESCRIPTION**

The General Plan Amendment proposes to amend the General Plan from Open Space-Conservation (OS:C) to Community Development: Medium High Density Residential (CD:MHDR) (5-8 Dwelling Units Per Acre).

III. **MEETING SUMMARY**

The following staff presented the subject proposal:
Project Planner, Mike Harrod, at (951) 955-1881 or e-mail mharrod@rctlma.org.

No one spoke in favor, neutral or in opposition of the subject proposal.

IV. **CONTROVERSIAL ISSUES**

NONE

V. **PLANNING COMMISSION ACTION**

The Planning Commission, continued the subject proposal to September 30, 2009.

APPROVAL

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.

**PLANNING COMMISSION
MINUTE ORDER JUNE 24, 2009
RIVERSIDE COUNTY ADMINISTRATIVE CENTER**

- I. **AGENDA ITEM 7.3: GENERAL PLAN AMENDMENT NO. 985** – Foundation-Regular – Applicant: Bob Taghdiri – Engineer/Representative: Grant Becklund - First Supervisorial District – Lakeland Village and South Elsinore Zoning Areas - Elsinore Area Plan: Open Space-Conservation– Location: Northerly of Grand Avenue, easterly of Russell Street, southerly of Como Street, and westerly of Lucerne Street - 34.14 Gross Acres - Zoning: Regulated Development Areas (R-D) and Watercourse, Watershed & Conservation Areas (W-1) - APN(s): 3721-090-003, 371-090-004, 371-150-009.
- II. **PROJECT DESCRIPTION**
The General Plan Amendment proposes to amend the General Plan from Open Space-Conservation (OS:C) to Community Development: Medium High Density Residential (CD:MHDR) (5-8 Dwelling Units Per Acre).
- III. **MEETING SUMMARY**
The following staff presented the subject proposal:
Project Planner, Mike Harrod, at (951) 955-1881 or e-mail mharrod@rctlma.org.
- The following spoke in favor of the subject proposal:
Kelly Buffa, Applicant’s Representative, 32735 E. La Palma Ave., Yorba Linda, California 92887
- No one spoke in favor, neutral or in opposition of the subject proposal.
- IV. **CONTROVERSIAL ISSUES**
NONE
- V. **PLANNING COMMISSION ACTION**
The Planning Commission, by a vote of 5-0, continued the subject proposal to July 22, 2009.
- 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.: 5.2
Area Plan: Elsinore
Zoning District: Lakeland Village
Supervisory District: First
Project Planner: Michael Harrod
Planning Commission: December 2, 2009

General Plan Amendment No. 985
Applicant: Bob Taghdiri
Engineer/Representative: Grant Becklund

COUNTY OF RIVERSIDE PLANNING DIRECTOR'S REPORT AND RECOMMENDATIONS

RECOMMENDATIONS:

Initially, the Planning Director's recommendation was to tentatively decline to adopt an order initiating proceedings for GPA00985 from Open Space: Open Space Conservation (OS-C) to Community Development: Medium High Density Residential (CD: MHDR) and the Planning Commission made the comments below. The Planning Director now recommends that the Board of Supervisors adopt an order initiating proceedings on the southernmost 1.87 acre parcel (APN 371-150-009) from OS-C to MHDR and as shown in Exhibit 7. 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 this site had major flooding, faulting, and environmental problems. He said that he could not think of another site where three major problems like these converge. He did not agree with the applicant's representative that all of these problems could be solved. At the request of the Planning Director, the Riverside County Flood Control and Water Conservation District (District) addressed flooding on the southern 1.87 acre parcel (APN 371-150-009). The District indicated that this parcel could be flood proofed, and Commissioner Roth commented that it would be appropriate to initiate the proposed change on this parcel only. The Planning Director concurred with the change to the 1.87 acre parcel only.

Commissioner John Snell: No Comment.

Commissioner John Petty: No Comment.

Commissioner Jim Porras: No Comment.

Commissioner Jan Zuppardo: No Comment.

Agenda Item No.: 5.2
Area Plan: Elsinore
Zoning District/Area: Lakeland Village
District/South Elsinore Area
Supervisorial District: First
Project Planner: Mike Harrod
Planning Commission: December 2, 2009
Continued from: September 30, 2009; July
22, 2009; June 24, 2009; May 13, 2009; and
April 15, 2009.

General Plan Amendment No. 985
(Foundation – Regular)
E.A. Number: 41815
Applicant: Bob Taghdiri
Engineer/Rep.: Grant Becklund

COUNTY OF RIVERSIDE PLANNING DEPARTMENT
STAFF REPORT

PROJECT DESCRIPTION AND LOCATION:

The applicant proposes to amend the General Plan Foundation from Open Space to Community Development and the land use designation from Open Space Conservation (OS-C) to Medium High Density Residential (MHDR) allowing Density allowing 5 to 8 dwelling units per acre on 12.5 acres of an approximately 34.14-acre property. The project is located north easterly of Grand Avenue, westerly of Turtle Dove Drive/Lucerne Street, and southerly and easterly of the City of Lake Elsinore.

FURTHER PLANNING CONSIDERATIONS

November 24, 2009

This item was continued from the September 30, 2009 Planning Commission meeting to allow the applicant additional time to address flooding.

FURTHER PLANNING CONSIDERATIONS

September 9, 2009

This item was continued from July 22, 2009 to allow the applicant additional time to meet with the Riverside County Flood Control and Water Conservation District (Flood Control) regarding the feasibility of flood proofing any development of the site with respect to the water level of Lake Elsinore. As of this writing, Flood Control has indicated that no subsequent meetings have occurred.

POTENTIAL ISSUES:

According to the applicant, the purpose of the proposed general plan amendment is to allow for the development of a mobile home park affordable to those with modest incomes. The envisioned park would consist of a club house, office, recreational amenities including a pool, 250 to 280 mobile home lots, landscaping and several acres of open space and may also include a marina and/or launch ramp. According to the applicant's engineer, this would involve changing the contour of the lake bottom at the northeast edge of the site, without changing the lake's storage capacity, changing the contour by increasing the depth in some areas and reducing it in others. This would require permits from the Army Corp of Engineers.

The entire site is located within the Lake Elsinore Environs Policy Area, a flood prone area, designated OS-C, limiting development within the 100-year flood plain, but anticipating changes from OS-C to Community Development land use designations, as flood control improvements shifts this area out of the 100-year flood plain. The policy area allows these changes to occur

outside the 5-year limit placed on Foundation component amendments by the Administration Element.

The changed condition cited by the applicant to justify the change from OS-C to MHDR is the Lake Elsinore Management Project, stabilizing the surface level of the lake at 1,240 feet above sea level. Riverside County Flood Control cautioned that additional storage capacity might be added in the future, raising the surface level of the lake.

During the 1980 flood, the lake surface level reached 1,263 feet above sea level and the Lake Elsinore Management Authority estimates that if the Lake Management Project and outlet channel to Alberhill Creek/Temescal Wash had existed, the lake would have risen no higher than approximately 1,263 feet. According to the applicant's engineer, the finished grade would have to be above the 1,263 foot elevation on the site.

However, Riverside County Flood has indicated that the finished grade would have to be above the 1268 foot elevation. County records show elevations on the site ranging from 1244, twenty-four feet below the grade identified by County Flood Control, to 1262, six feet below the required grade. For those areas outside the lake bottom, material may have to be imported to raise the grade to these levels. The FEMA maps used by County Flood Control show the entire site still falling within the 100-year flood plain. If these maps reflect the flood control improvements associated with the Lake Elsinore Management Project in place, then these improvements have not shifted the site outside the 100-year flood plain and there would be no basis for approving the proposed change from OS-C to MHDR. According to County Flood Control, the 1.87 acre parcel closest to Grand Avenue (371-150-009) could potentially be protected from flooding, but the remainder of the site is much more uncertain.

Primary access to the site is along Vail Street on the northwest edge of the site, while secondary access is available from Turtle Dove Drive to the southeast. Water and sewer service is available to the site at Turtle Dove Drive and Hillview Lane and along Grand Avenue.

The site is located in two criteria cells (Cell 5036 & Cell 5038) of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). These cells will contribute to assembly of Proposed Extension of Existing Core 3. This extension conserves soils of the Traver series, which are important to the maintenance of several species of Narrow Endemic Plants and provides habitat for shore bird use and since surrounding land uses include community development, management of edge conditions in this area will be necessary to maintain high quality habitat in this area.

The majority of the site falls within Cell 5038, conservation focusing on grassland and connecting to grassland habitat proposed for conservation in Cell 5036 to the east. Conservation within this cell will range from 35% to 45% of the Cell focusing in the eastern central portion of the Cell.

A portion of the site also falls within Cell 5036, conservation focusing on grassland habitat and connecting to grassland habitat proposed for conservation in Cell 5038 to the west and 5033 to the east. Conservation within this cell will range from 40% to 50% of the Cell focusing in the southwest portion of the Cell.

This preliminary review suggests that conservation may be required as the vegetation identified on the site is largely grassland and includes shoreline areas. Any proposed development of the site will require full review under the Habitat Assessment and Negotiation Strategy.

The entire site is located within a county fault zone, having an increased potential for seismic hazards and fault rupture than in other areas, and potentially posing a significant threat to life and property. According to the General Plan's Safety Element, the primary technique used to mitigate such hazards is to setback from and avoid active faults. If an active fault is present, any structure used for human occupancy shall be setback a minimum of 50' unless otherwise determined by the County Engineering Geologist. This potential hazard would have to be investigated and impacts mitigated prior to any project approval on the site.

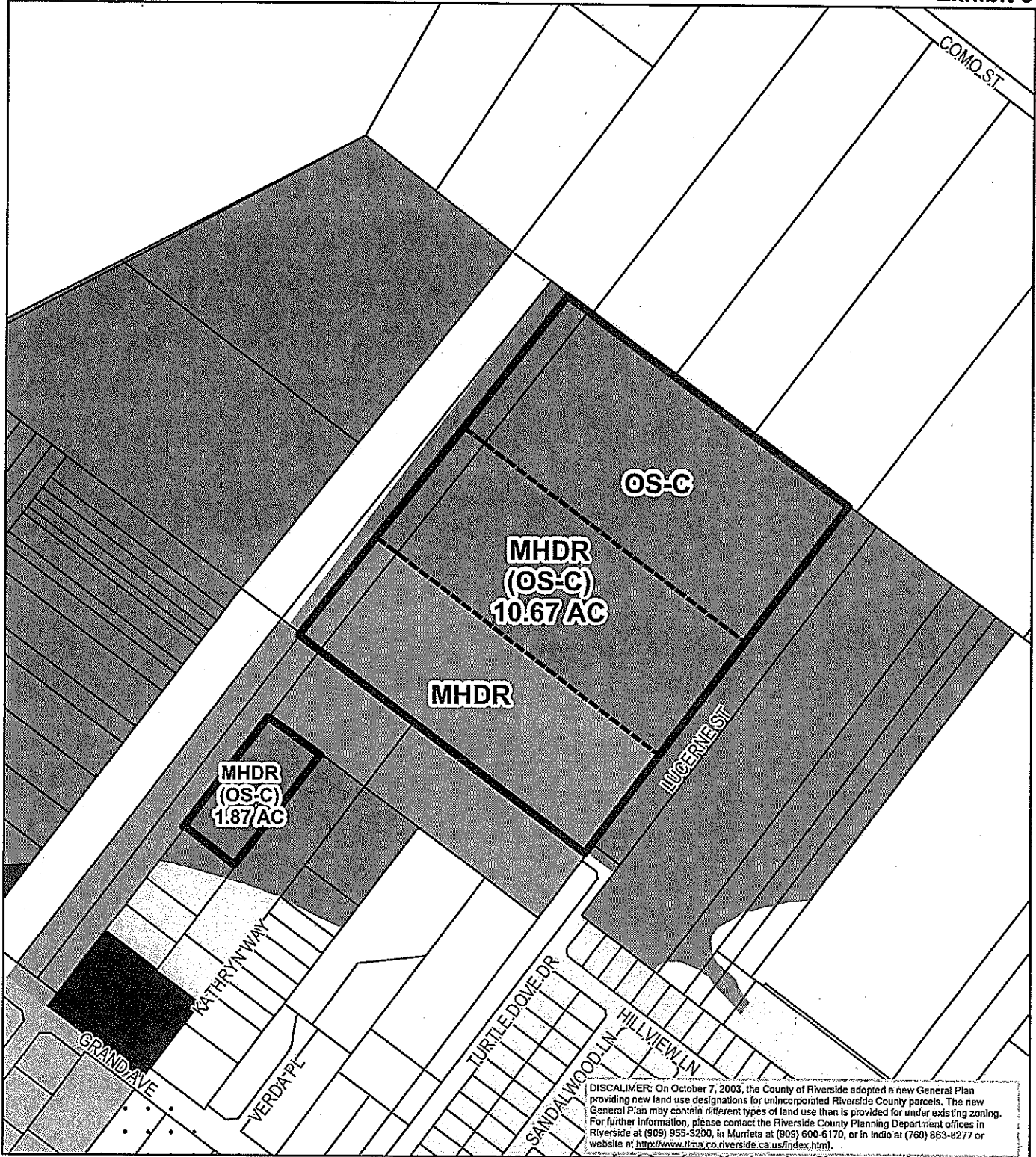
The site is located within the Lakeland Village/Wildomar Redevelopment Area (RDA). The Riverside County Redevelopment Agency (Agency), the State of California and the Federal Department of Housing and Urban Development (HUD) only recognizes affordable housing that is legally binding by covenant or contract. The applicant has indicated that the envisioned development associated with this general plan amendment would "offer affordable housing to the modest income segment of the market." Without covenant or contract, such development would not be considered "affordable" as defined by these government entities. Given existing economic conditions, there is a surplus of generically affordable residences for sale in both the redevelopment project area and elsewhere, including lender and non-lender owned housing, as well as abandoned and/or dilapidated residential structures that can be purchase inexpensively and free of potential flooding and seismic/geologic hazards. The costs of obtaining specialized permits, dredging the lake bed, building a clubhouse, providing recreational amenities and a potential marina may catapult the price of potential units well beyond the range of those with modest income.

RECOMMENDATIONS:

The Planning Director's recommendation is to **tentatively decline** to adopt and order initiating proceedings for General Plan Amendment No. 985 from Open Space Conservation to Medium High Density Residential. The adoption of such an order does not imply that the proposed GPA will be approved.

INFORMATIONAL ITEMS:

1. The project site is currently designated as Assessor's Parcel Numbers 371-090-003, 371-090-004, and 371-150-009.
2. The project was filed with the Planning Department on 2/14/2008.
3. Deposit Based Fees charged to this project, as of the time of staff report preparation, total \$8,881.54.

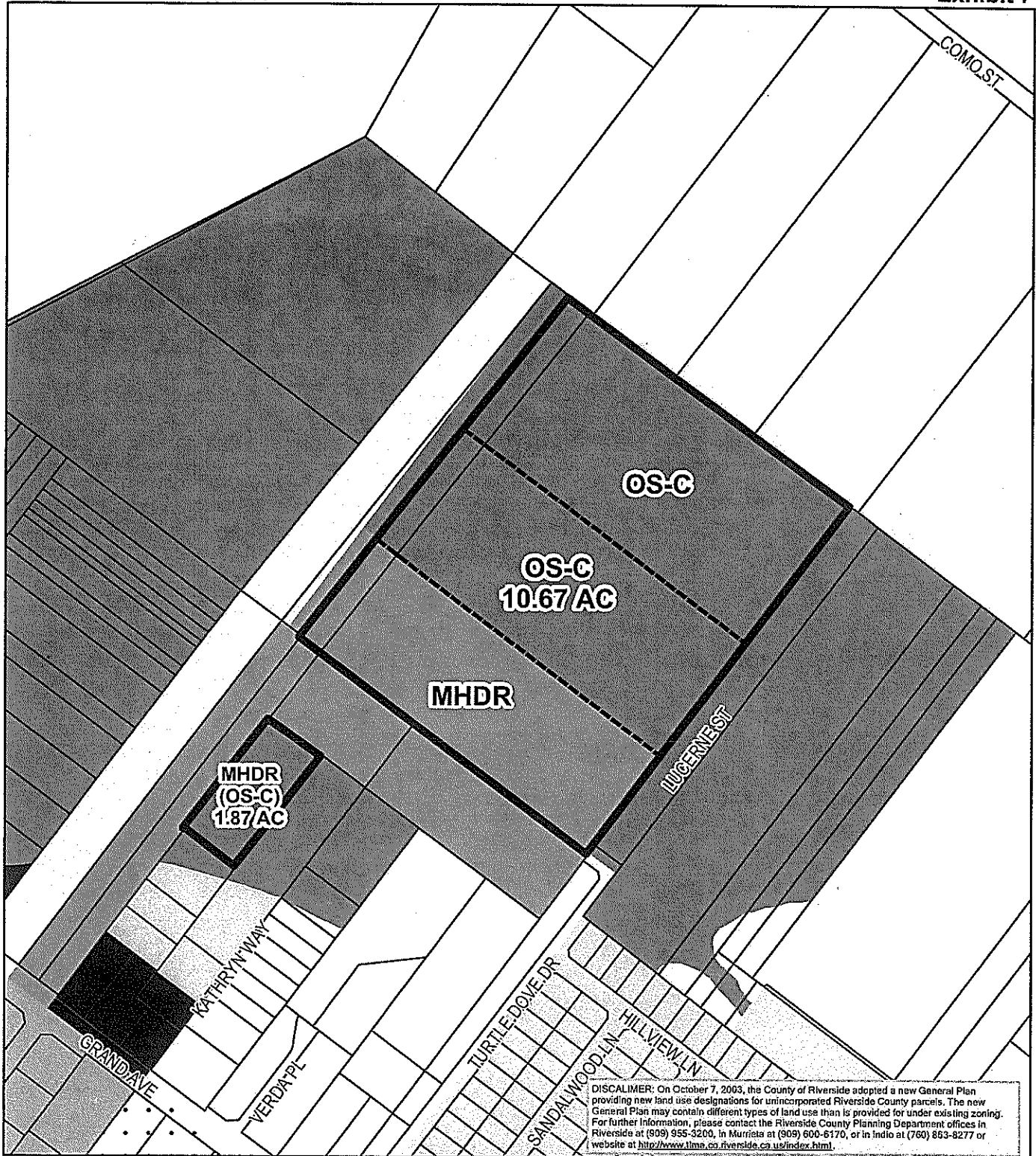


RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
District: Lakeland Village
Township/Range: T6SR4W
Section: 19



Assessors
Bk. Pg. 317-09
Thomas
Bros. Pg. 896 E3

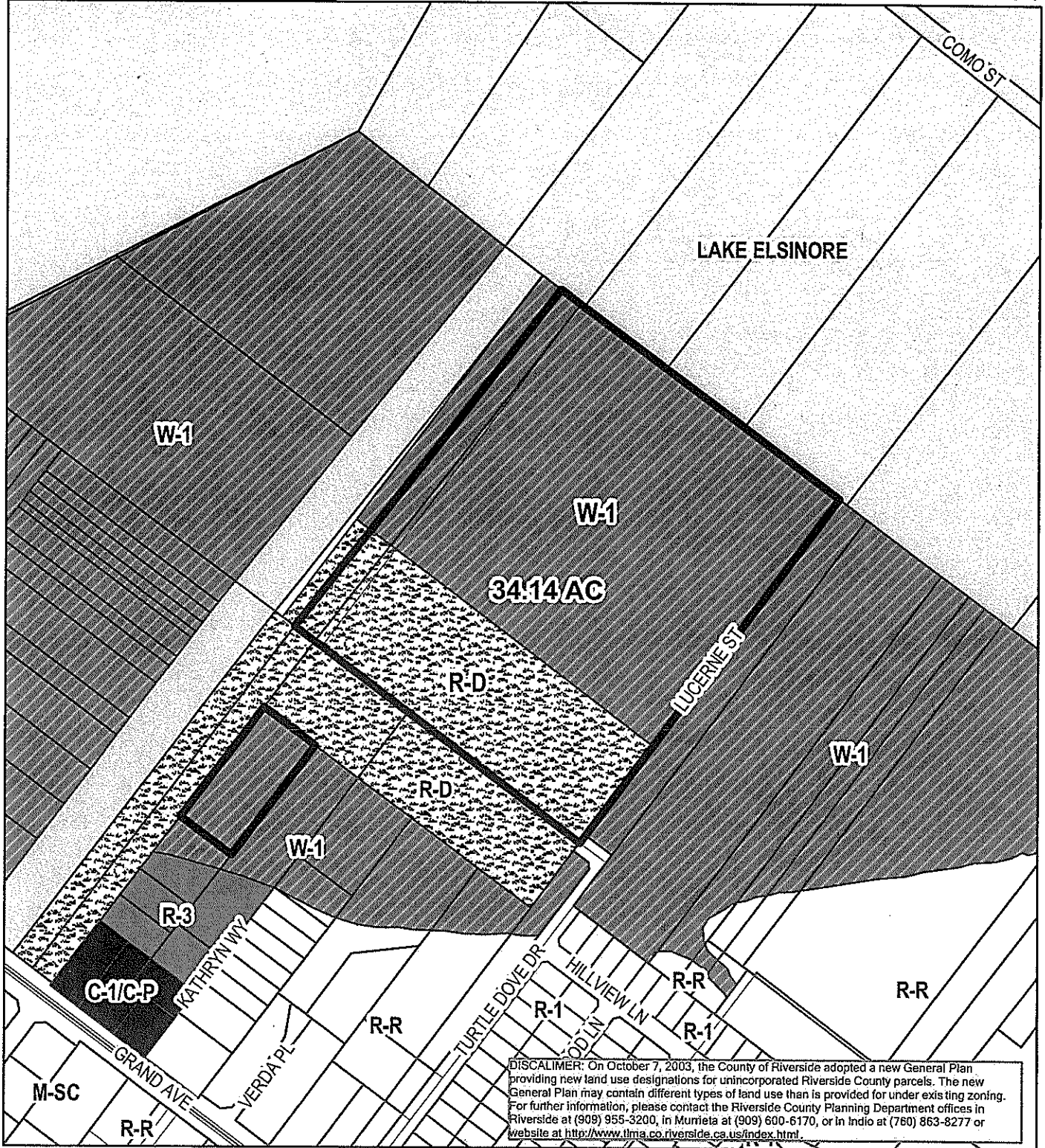


RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
District: Lakeland Village
Township/Range: T6SR4W
Section: 19

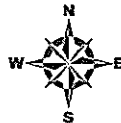


Assessors
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Thomas
Bros. Pg. 896 E3

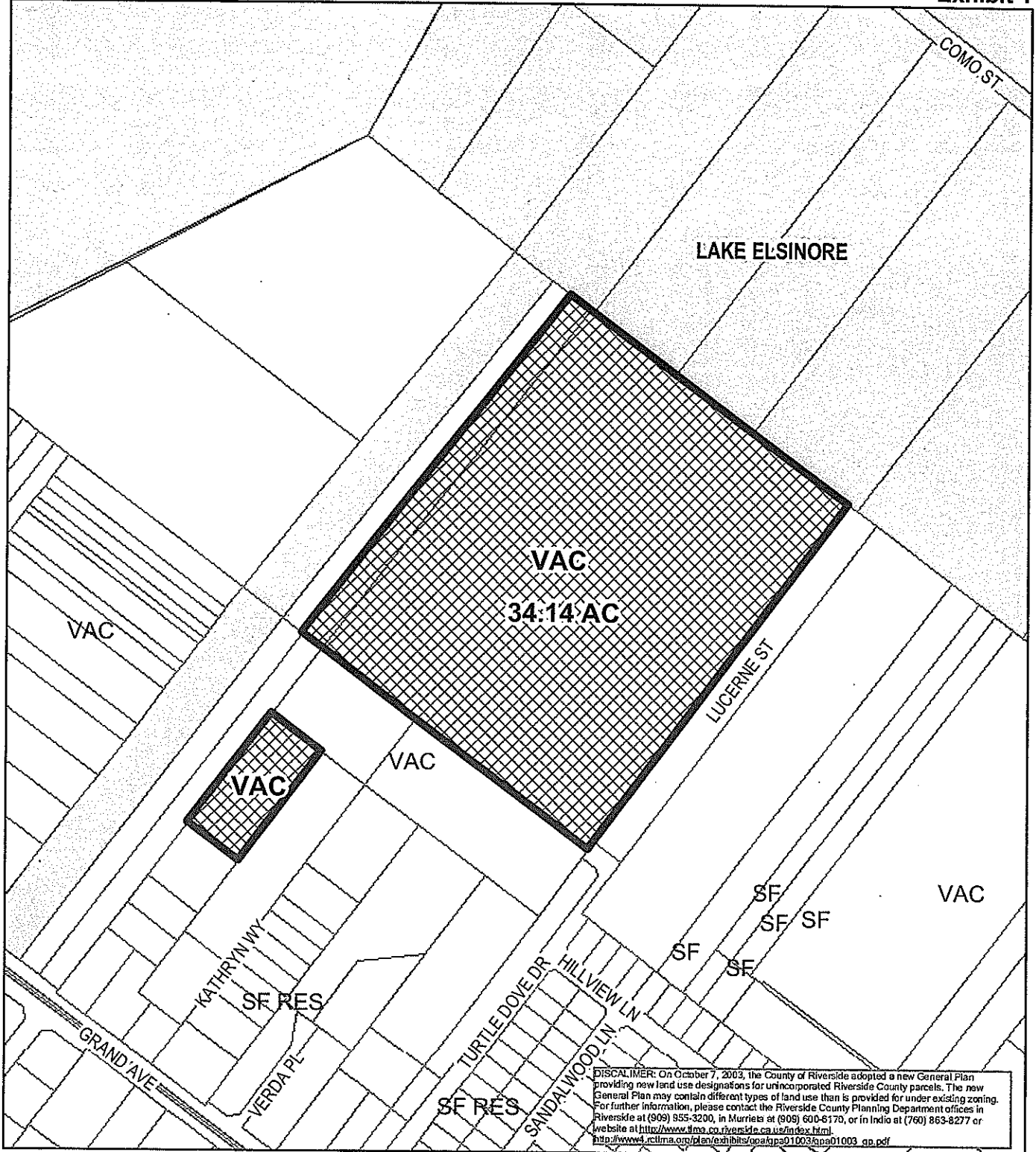


RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
District: Lakeland Village
Township/Range: T6SR4W
Section : 19



Assessors
Bk. Pg. 317-09
Thomas
Bros. Pg. 896 E3



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 (909) 855-3200, in Murrieta at (909) 600-6170, or in Indio at (760) 863-8277 or website at <http://www.rca.ca.gov/riverside.ca.us/index.html>.
<http://www4.rclima.com/plan/exhibits/gpa00985/01003.ap.pdf>

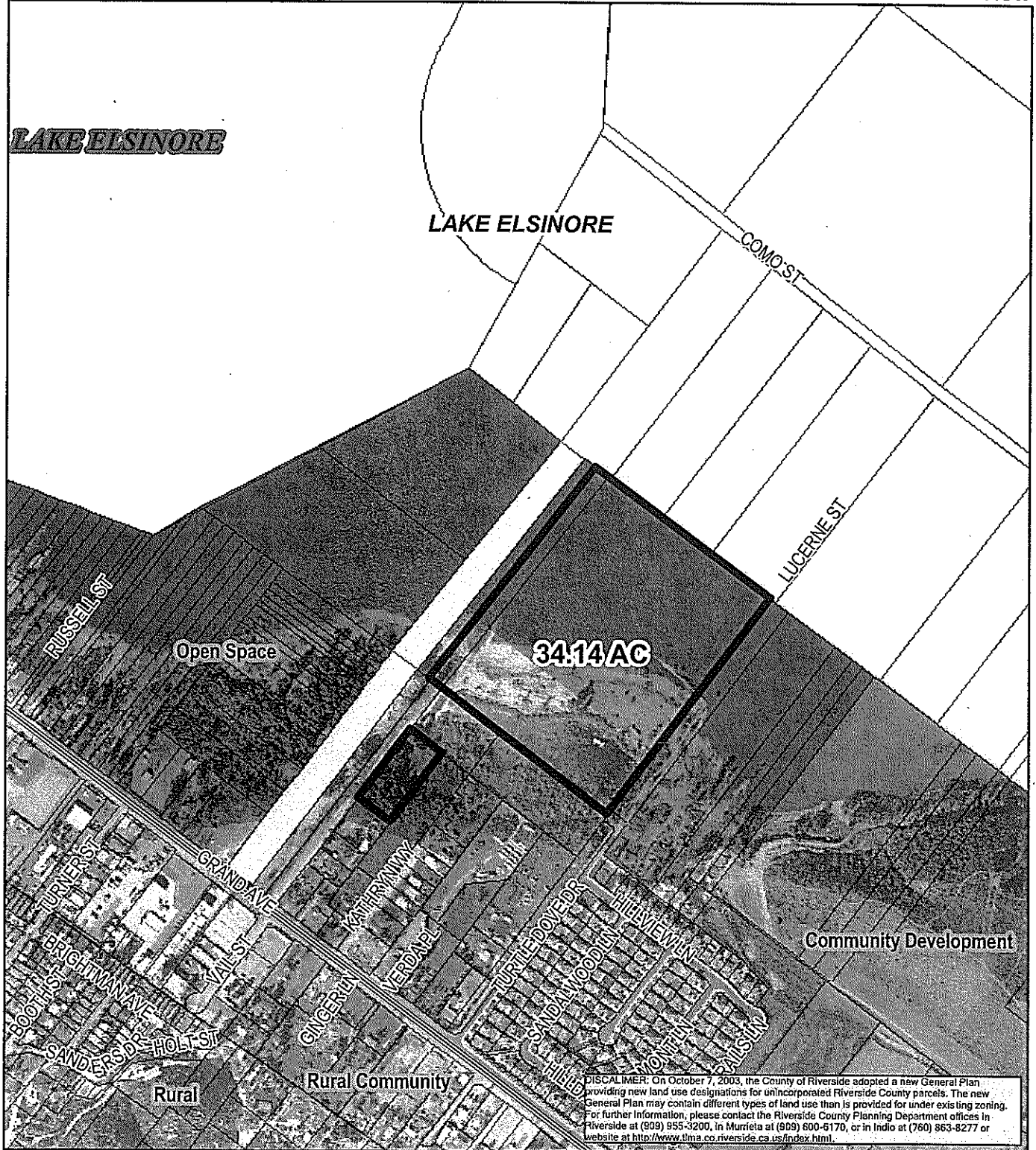
RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
District: Lakeland Village
Township/Range: T6SR4W
Section: 19



Assessors
Bk. Pg. 317-09
Thomas
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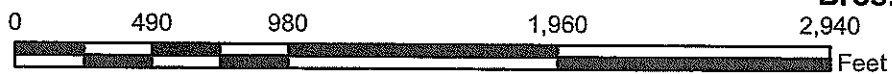


RIVERSIDE COUNTY PLANNING DEPARTMENT

District
Plan: Lakeland Village
Township/Range: T6SR4W
Section: 19



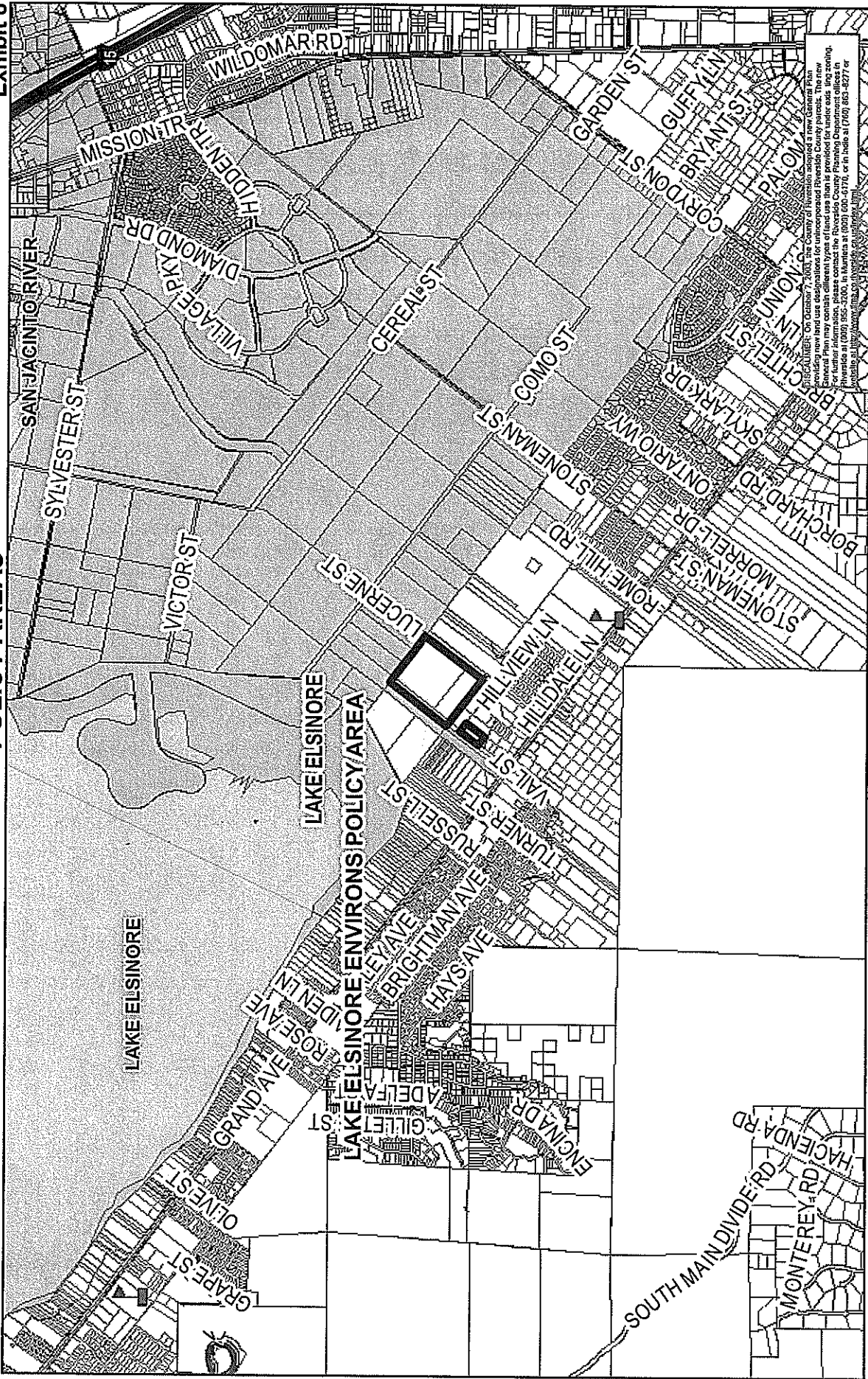
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Supervisor Buster
District 1
Date Drawn: 4/23/08

GPA00985 POLICY AREAS

Planner: Amy Aldana
Date: 3/14/08
Exhibit 8



This map was prepared using data provided by Riverside County Planning Department. The map is not intended to be used for any purpose other than that for which it was prepared. Riverside County Planning Department is not responsible for any errors or omissions on this map. For further information, please contact the Riverside County Planning Department offices in Riverside at (951) 955-2200, in Murietta at (951) 661-4776, or in Indio at (760) 863-8277 or visit our website at www.riversidecountyplanning.com.

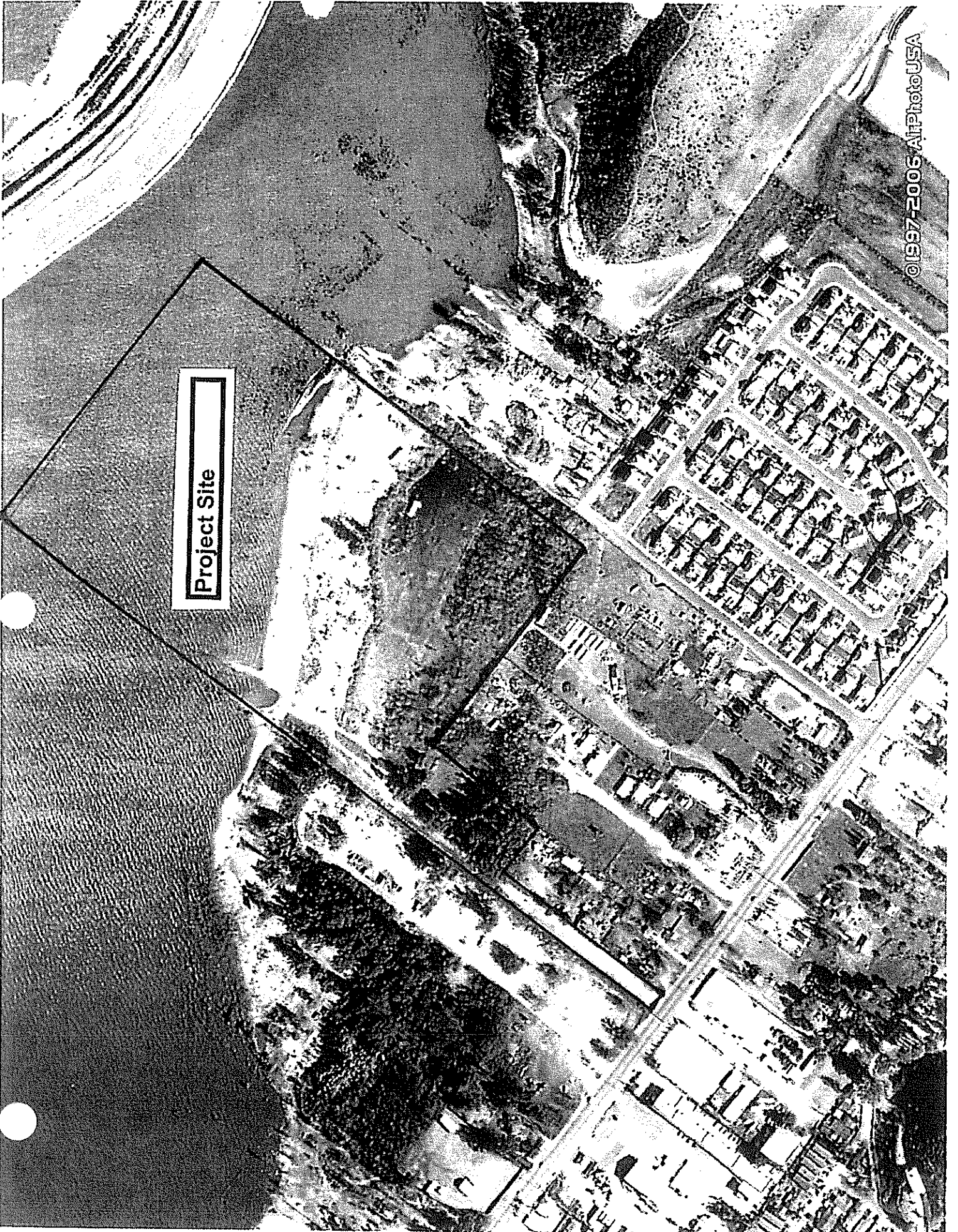
RIVERSIDE COUNTY PLANNING DEPARTMENT

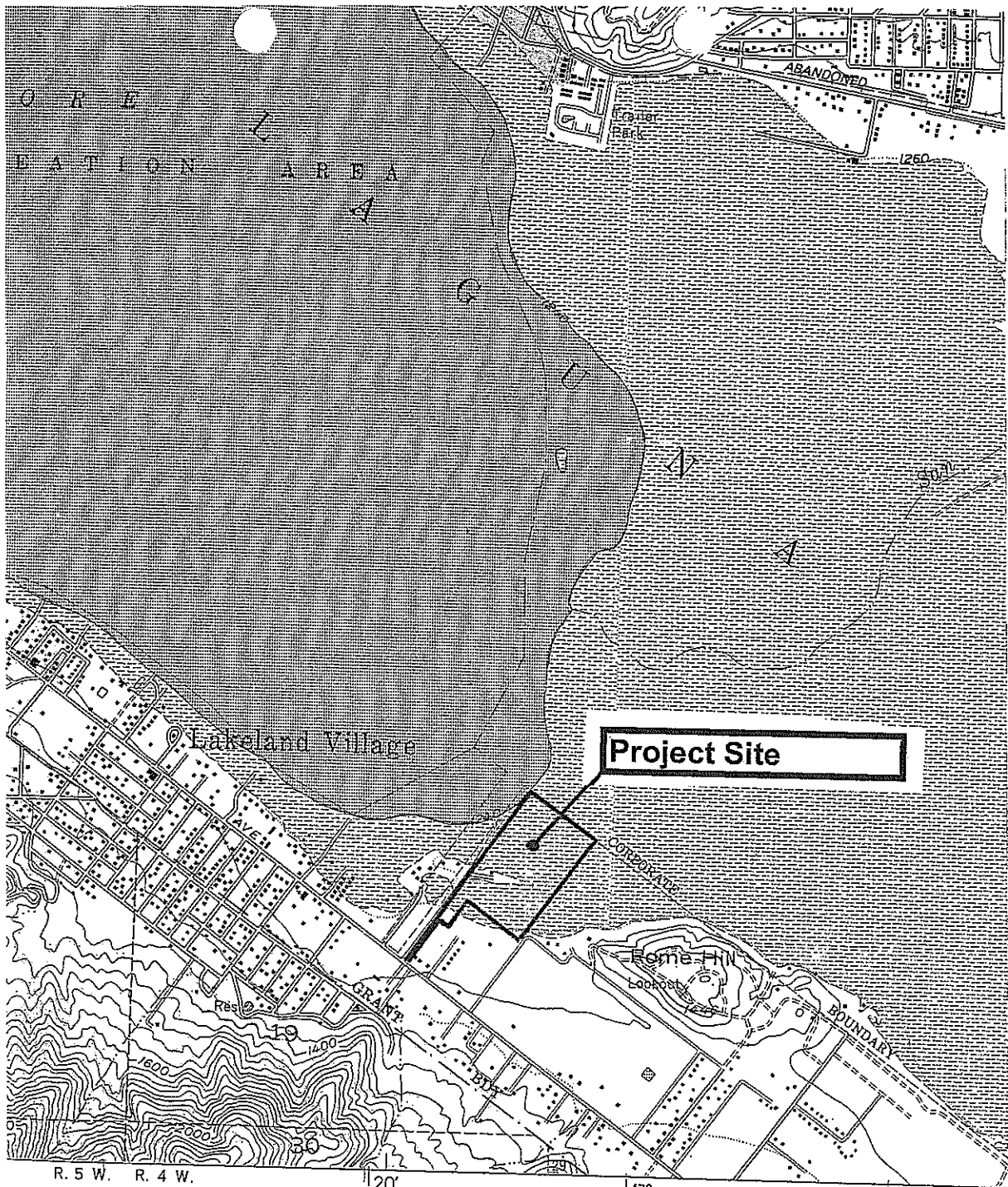
Zone
District: Lakeland Village
Township/Range: T6SR4W
Section : 19

Assessors
Bk. Pg. 317-09
Thomas
Bros. Pg. 896 E3



Project Site





Project Site

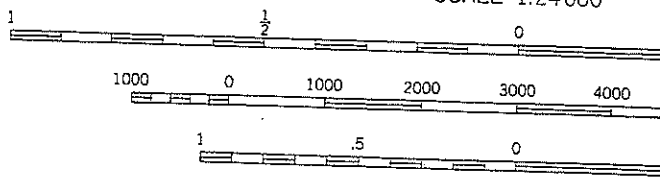
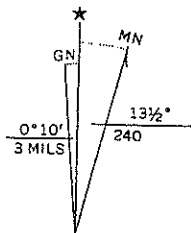
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T. 17 N.

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LAKE ELSINORE, CALIF.

(FORMERLY ELSINORE)

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DMA 2551 III NE-SERIES V895

APPLICATION FOR AMENDMENT TO THE RIVERSIDE COUNTY GENERAL PLAN

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

Portions of this site that were originally in the Flood Plain for Lake Elsinore can now be developed because of the improvements constructed by the Lake Elsinore Stabilization Project.

This land that can now be incorporated into the project and will make the proposed mobile home park a more desirable project with the amenities and units that can now be added.

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): _____

September 26, 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 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

4/15/09
8.10

April 13, 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: Items 6.0 and 8.0, General Plan Amendment Initiation Proceedings
(April 15, 2009)**

Dear Chair and Commission Members:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPA proposals. While we are encouraged by many rigorous recommendations from staff, we respectfully disagree on others.

Item 6.1, GPA 909 (Mead Valley)

Disagree with staff recommendation. This site is part of the Good Hope Rural Village Overlay Study Area, which is being planned as part of the County's GPA 960. It would be *premature* to identify this location in a piecemeal manner for light industrial uses. It should be planned in a *coherent* manner with the rest of the Overlay. Initiation should be denied and the landowner referred to the GPA 960 process.

Item 6.2, GPA 949 (Meadowbrook)

Disagree with staff recommendation. This site is part of the Meadowbrook Rural Village Overlay Study Area, which is being planned as part of the County's GPA 960. It would be *premature* to identify this location in a piecemeal manner for intensified use. It should be planned in a *coherent* manner with the rest of the Overlay. Initiation should be denied and the landowner referred to the GPA 960 process.

Item 6.3, GPA 743 (Elsinore)

Disagree with staff recommendation. This proposal is piecemeal urbanization that exemplifies the defects of the landowner-initiated GPA process. While EHL generally supports using land already designated as Community Development in a more efficient manner, there is question as to whether this land was properly designated in the first place. No evidence has been submitted to support the finding that in order to meet housing goals, "Special circumstances or conditions have emerged that were

unanticipated in preparing the General Plan.” What *are* the quantified “housing goals” for the unincorporated area? How much housing capacity is present in land *already* designated for urbanization? If additional capacity is needed, is this the best location based upon jobs, services, traffic and proximity to existing infrastructure and development? Until these basic planning questions are answered, this proposal should not be initiated.

Item 6.4, GPA 815 (Temescal Canyon)

More information needed. While creations of an employment center along I-15 may well make sense, several questions must first be answered. Why can't these same uses occur under the present designations? As this property is within MSHCP Criteria Cells, what is the effect of the change on reserve assembly? This information should be solicited from the Environmental Programs Dept. As the current designation includes Community Center, what was the original purpose of the Community Center and to what extent will those important planning goals be lost or changed by the Specific Plan?

Item 6.5, GPA 1073 (County-wide)

We support the intent of these revisions to General Plan Policy LU-6.2, to clarify that public facilities may be sited outside of the Public Facilities designator and to protect valuable Open Space lands from such incompatible uses. Proposed for deletion, however, is language that preferentially locates some public facilities in Community Development and Rural Community rather than Rural and Agriculture. For community-serving public facilities (as opposed to those with potential for nuisance), this policy language is appropriate, as it reduces vehicle travel and creates community identity. We thus suggest language to recapture this concept.

Item 8.1, GPA 940 (REMAP)

Concur with staff recommendation to deny initiation. As pointed out in the staff report, the need for additional commercial uses is being addressed through new Rural Incidental Commercial Policies (via GPA 960) that will provide such services to residents and travelers. Generally, this region is unsuited for non-rural development due to infrastructure and service deficiency, lack of water, fire hazard, MSHCP Criteria Cells, etc. No new circumstances justify the proposed foundation change, and overall planning issues should be deferred to the Rural Village Overlay process ongoing within County-initiated GPA 960.

Item 8.2, GPA 952 (REMAP)

Concur with staff recommendation to deny initiation. This proposal would create large scale urbanization on 733 acres in an area utterly unsuited to these uses, due to infrastructure and service deficiency, lack of water, fire hazard, MSHCP Criteria Cells, etc. No new circumstances justify the proposed foundation change, and overall planning issues should be deferred to the Rural Village Overlay process ongoing within County-initiated GPA 960.

Item 8.3. GPA 953 (Rancho California)

Concur with staff recommendation to deny initiation. The need for any additional commercial uses is being addressed through new Rural Incidental Commercial Policies (via GPA 960) that will provide such services to residents and travelers. The property is also affected by MSHCP Criteria Cells and fire hazard.

Item 8.4. GPA 1015 (REMAP)

Concur with staff recommendation to deny initiation. The need for additional commercial uses is being addressed through new Rural Incidental Commercial Policies (via GPA 960) that will provide such services to residents and travelers. Generally, this region is unsuited for non-rural development due to infrastructure and service deficiency, lack of water, fire hazard, MSHCP Criteria Cells, etc. No new circumstances justify the proposed foundation change, and overall planning issues should be deferred to the Rural Village Overlay process ongoing within County-initiated GPA 960.

Item 8.5. GPA 1025 (REMAP)

Concur with staff recommendation to deny initiation. This region is unsuited for non-rural development due to infrastructure and service deficiency, lack of water, fire hazard, MSHCP Criteria Cells, etc. No new circumstances justify the proposed foundation change, and overall planning issues should be deferred to the Rural Village Overlay process ongoing within County-initiated GPA 960.

Item 8.6. GPA 1044 (REMAP)

Concur with staff recommendation to deny initiation. The need for additional commercial uses is being addressed through new Rural Incidental Commercial Policies (via GPA 960) that will provide such services to residents and travelers. Generally, this region is unsuited for non-rural development due to infrastructure and service deficiency, lack of water, fire hazard, MSHCP Criteria Cells, etc. No new circumstances justify the proposed foundation change, and overall planning issues should be deferred to the Rural Village Overlay process ongoing within County-initiated GPA 960.

Item 8.7. GPA 934 (San Jacinto Valley)

Concur with staff recommendation to deny initiation. This intact agricultural area is inappropriate for conversion to more intensive residential uses, and as staff points out, no compelling new circumstances justify such change. Surrounding parcels are Agriculture and Open Space. While staff believes that future consideration for redesignation as commercial may be appropriate, no evidence is provided that more commercial land is actually needed. Rather, future needs might be met through the Rural Incidental Commercial Policies under development in GPA 960, intended to provide these services to residents and travelers. In addition, until it is shown that intensified uses will not interfere with MSHCP assembly within the affected Criteria Cells, changes in land use should not move forward.

Item 8.8, GPA 937 (Lake Mathews)

Concur with staff recommendation to deny initiation. The proposal is to change the current Rural and Rural Community designations to continuous estate lots in the Rural Community and Community Development categories. Such inefficient development on 733 acres would wastefully consume an inordinate amount of land while producing little and no affordable housing. The site is also constrained by the MSHCP. Annexation into the Cajalco Wood Policy Area, as staff proposes, may provide a better balance of more efficient development and natural open space if consistency with the MSCHP can be established.

Item 8.9, GPA 957 (Anza)

Concur with staff recommendation to deny initiation. This proposal for conversion of 258 acres from Rural to Rural Community estate lots lies outside the village core and is therefore inappropriate for increased intensification. Initiation would render the Anza Community Vision and Goals process meaningless. There are no new compelling circumstances, and all open space benefits of the proposal can be achieved or bettered by consolidation of the 64 units allowed under the existing designations. Staff is to be commended for the excellent capacity analysis showing no need for additional large residential lots in this area. In general, Anza is deficient in infrastructure and water, and has limited potential for intensified uses.

Item 8.10, 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 8.11, GPA 621 (Lakeview Nuevo)

Need more information. The project site is within MSHCP Criteria Cells along the San Jacinto River, which is a particularly challenging area for preserve assembly. What effect would the proposed change have on the assembly process? If negative, then initiation should not proceed.

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

Sincerely,

Dan Silver, MD
Executive Director

Electronic cc: Board Members and Board Offices
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