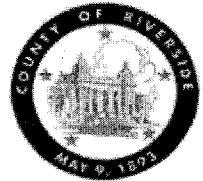


SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA



204B

FROM: TLMA - Planning Department

SUBMITTAL DATE:
June 10, 2010

SUBJECT: GENERAL PLAN AMENDMENT NO. 1022 – Foundation-Regular – Applicant: JBL Investment, Inc. – Engineer/Representative: Medofer Engineering, Inc. - Fifth Supervisorial District - Mead Valley Zoning District - Mead Valley Area Plan: Rural: Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) – Location: Northerly of Metz Road, easterly of Rocky Hills Road, southerly of Nuevo Road, and westerly of Lukens Lane. - 36.71 Gross Acres - Zoning: Rural Residential - 1/2 Acre Minimum Lot Size (R-R-1/2) - **REQUEST:** This General Plan Amendment proposes to amend the General Plan Foundation Component of the subject site from Rural to Community Development and to amend the land use designation of the subject site from Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) to Low Density Residential (CD-LDR) (1/2 Acre Minimum Lot Size) - **APN(s): 323-100-019, 323-100-020**

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

Ron Goldman
Planning Director

Initials:
RG:trj
trj

(continued on attached page)

REVIEWED BY EXECUTIVE OFFICE

DATE 6/14/2010
Tina Grande

Departmental Concurrence

ATTACHMENTS FILED WITH
THE CLERK OF THE BOARD

Policy

Consent

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

Prev. Agn. Ref.

District: Fifth

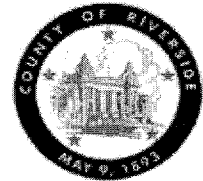
Agenda Number:

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.

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



204B

FROM: TLMA - Planning Department

SUBMITTAL DATE:
June 10, 2010

REVIEWED BY EXECUTIVE OFFICE

DATE 6/14/10
Tina Grande

Departmental Concurrence

SUBJECT: GENERAL PLAN AMENDMENT NO. 1022 – Foundation-Regular – Applicant: JBL Investment, Inc. – Engineer/Representative: Medofer Engineering, Inc. - Fifth Supervisorial District - Mead Valley Zoning District - Mead Valley Area Plan: Rural: Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) – Location: Northerly of Metz Road, easterly of Rocky Hills Road, southerly of Nuevo Road, and westerly of Lukens Lane. - 36.71 Gross Acres - Zoning: Rural Residential - 1/2 Acre Minimum Lot Size (R-R-1/2) - **REQUEST:** This General Plan Amendment proposes to amend the General Plan Foundation Component of the subject site from Rural to Community Development and to amend the land use designation of the subject site from Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) to Low Density Residential (CD-LDR) (1/2 Acre Minimum Lot Size) - **APN(s): 323-100-019, 323-100-020**

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.

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Ron Goldman
Planning Director

Initials:
RG:tr
RW

(continued on attached page)

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

Prev. Agn. Ref.

District: Fifth

Agenda Number:

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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 MARCH 3, 2010
RIVERSIDE COUNTY ADMINISTRATIVE CENTER**

- I. AGENDA ITEM 7.1: GENERAL PLAN AMENDMENT NO. 1022** - Foundation / Regular - Applicant: JBL Investment, Inc. - Engineer/Representative: Medofer Engineering, Inc. - Fifth Supervisorial District - Mead Valley Zoning District - Mead Valley Area Plan: Rural: Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) - Location: Northerly of Metz Road, easterly of Rocky Hills Road, southerly of Nuevo Road, and westerly of Lukens Lane. - 36.71 Gross Acres - Zoning: Rural Residential - 1/2 Acre Minimum Lot Size (R-R-1/2)
- II. PROJECT DESCRIPTION**
This General Plan Amendment proposes to amend the General Plan Foundation Component of the subject site from Rural to Community Development and to amend the land use designation of the subject site from Rural Residential (RUR-RR) (5 Acre Minimum Lot Size) to Low Density Residential (CD-LDR) (1/2 Acre Minimum Lot Size).
- III. MEETING SUMMARY**
The following staff presented the subject proposal:
Project Planner: Tamara Harrison Ph: (951) 955-9721 or E-mail tharriso@rctlma.org
- The following spoke in favor of the subject proposal:
Michael Medofer, Applicant's Representative, 28610 Midsummer Lane, Menifee, CA 92584
- 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.
- 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.: 7.1
Area Plan: Mead Valley
Zoning District: Mead Valley
Supervisorial District: Fifth
Project Planner: Tamara Harrison
Planning Commission: March 3, 2010

General Plan Amendment No. 1022
Applicant: JBL Investments, Inc.
Engineer/Representative: Medofer Eng.

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. 1022 from Rural: Rural Residential to Community Development: 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 stated that a Community Development land use designation would not be appropriate at the subject site. Mr. Roth indicated that the site needs to stay within the Rural or Rural Community Foundation Components and that the land use designation must be compatible with the surrounding area. Mr. Roth inquired about the density of the lots to the southwest of the subject site. The applicant indicated that the lots to the southwest, just north of Evans Street are approximately 1 acre, those lots directly to the south of the subject site are approximately 2 ½ acres and the lots directly to the north of the site are approximately 2 ½ acres. Commissioner Roth inquired as to whether or no the applicant had considered either Very Low Density Residential or Estate Density Residential. The applicant indicated that he was not opposed to seeking a designation that is less dense than Low Density Residential. Mr. Roth stated that Rural Community: Estate Density Residential may be the most appropriate designation for the site. Planning Director, Ron Goldman, added that staff had considered alternatives to the current designation of Rural Residential for the site. Mr. Goldman stated that as the aerial exhibit shows the site has a number of rock outcroppings as well as access issues and that these constraints coupled with the issues mentioned in the staff report, it was concluded that the current designation is correct.

Commissioner John Snell: No Comments

Commissioner John Petty: No Comments

Commissioner Jim Porras: No Comments

Commissioner Jan Zuppardo: Commissioner Zuppardo commented that the applicants proposed designation of Low Density Residential is too dense for the area. She also commented that although it would still need to be looked at closely, Estate Density Residential designation would be a more suitable possibility for the site.

Agenda Item No.: 7.1
Area Plan: Mead Valley
Zoning District: Mead Valley
Supervisorial District: Fifth
Project Planner: Tamara Harrison
Planning Commission: March 3, 2010

General Plan Amendment No. 1022
Applicant: JBL Investments, Inc.
Engineer/Representative: Medofer Eng. Inc.

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: Low Density Residential (CD: LDR) (1/2 acre minimum lot size) for an approximately 36.71-acre property. The project is located northerly of Metz Road, easterly of Rocky Hills Road, southerly of Nuevo Road and westerly of the Lukens Lane.

POTENTIAL ISSUES OF CONCERN:

The subject site is located in the "Mead Valley" community within the "Mead Valley" area plan. The site is also located within the City of Perris's Sphere of Influence. The site is adjacent to existing Rural Residential to the south and to the north across Elieth Road, Rural Community: Very Low Density Residential to the west and the City of Perris to the east across Lukens Lane. The Community Development (CD) Foundation Component does exist in the area to the southeast of the site, south of Metz Road and north of Weston Road; however, the existing CD was designated as such due to an older existing tract, "Altura Encantada." The portion of the City of Perris that lies directly to the east of the subject site has been designated as Open Space in preservation of the "Motte Rimrock Reserve." The majority of the surrounding area is rural in character with many of the lots housing natural rock outcroppings. The proposed designation would be inconsistent with the existing character that has been established in the area and with the overall vision for the area.

The "Motte Rimrock Reserve" is significantly important to the area given its rare archaeological resources such as pictographs. Critical habitat for a variety of species is also protected within the reserve. These habitats are home to many rare animals including the Stephen's Kangaroo Rat as well as the California Gnatcatcher. The reserve remains a part of the University of California's Natural Reserve System and continues to be a huge asset to the community; therefore, the reserve must be considered before more intense land use designations are brought to the area.

Among the justifications provided for the proposed amendment is the flatness of the site, thereby limiting potential grading on the site. The applicant has also indicated that conventional septic may not be feasible and so higher densities would allow sewer to be extended to the site. Staff spoke with the Environmental Health Department about sewage treatment in the area. The site does have high ground water and clay soils, however, advanced treatment units have been used in similar situations at a cost of \$25,000 to \$40,000 per unit. The alternative, extending sewer lines $\frac{3}{4}$ of a mile to the site at a potential cost of one million dollars per mile with a \$4,000 per unit hookup fee, may be half as costly based on these estimates. However, these services have not been extended to this area in anticipation of additional growth and the level of sewer service is consistent with the planned growth in the area by both the County and the City of Perris. According to information provided by the applicant, Eastern Municipal Water District (EMWD) currently has a preliminary design complete for a sewer system to the southeast of the subject site at "Enchanted Heights;" however, due to the lack of funding the project is

not a priority for the District at this time. EMWD has also indicated that the preliminary design only addresses the "Enchanted Heights" project and does not address any other parcels or projects at this time.

The subject site is also located within a State of California fire responsibility area. Increasing the density allowed for the site would expose potential dwelling units to increased fire hazards, creating an inconsistency between the Land Use Element and the Safety Element of the General Plan.

The site does fall within the boundaries of the County's Multiple Species Habitat Plan (MSHCP); however, the site is not specifically within a Cell. The site will be required to conform to additional plan wide requirements of the MSHCP such as Riparian/Riverine Policies, Specific Species Surveys, Urban/Wildlands Interface Guidelines (UWIG) and Narrow Endemic Plant Species Policies and Determination of Biologically Equivalent or Superior Preservation Analysis (DBESP) as applicable. Conserved portions of the site, if any, will be identified as part of the Habitat Acquisition and Negotiation Strategy (HANS) process.

No evidence of change or new circumstances have been identified in the area that would substantiate the request, the area remains rural in character.

RECOMMENDATIONS:

The Planning Director's recommendation is to tentatively decline to adopt an order initiating proceedings for General Plan Amendment No. 1022 from Rural: Rural Residential to Community Development: Low Density Residential.

INFORMATIONAL ITEMS:

1. This project was filed with the Planning Department on February 15, 2008.
2. Deposit Based Fees charged for this project as of the time of staff report preparation, total \$6279.00.
3. The project site is currently designated as Assessor's Parcel Numbers 323-100-019 and 323-100-020.

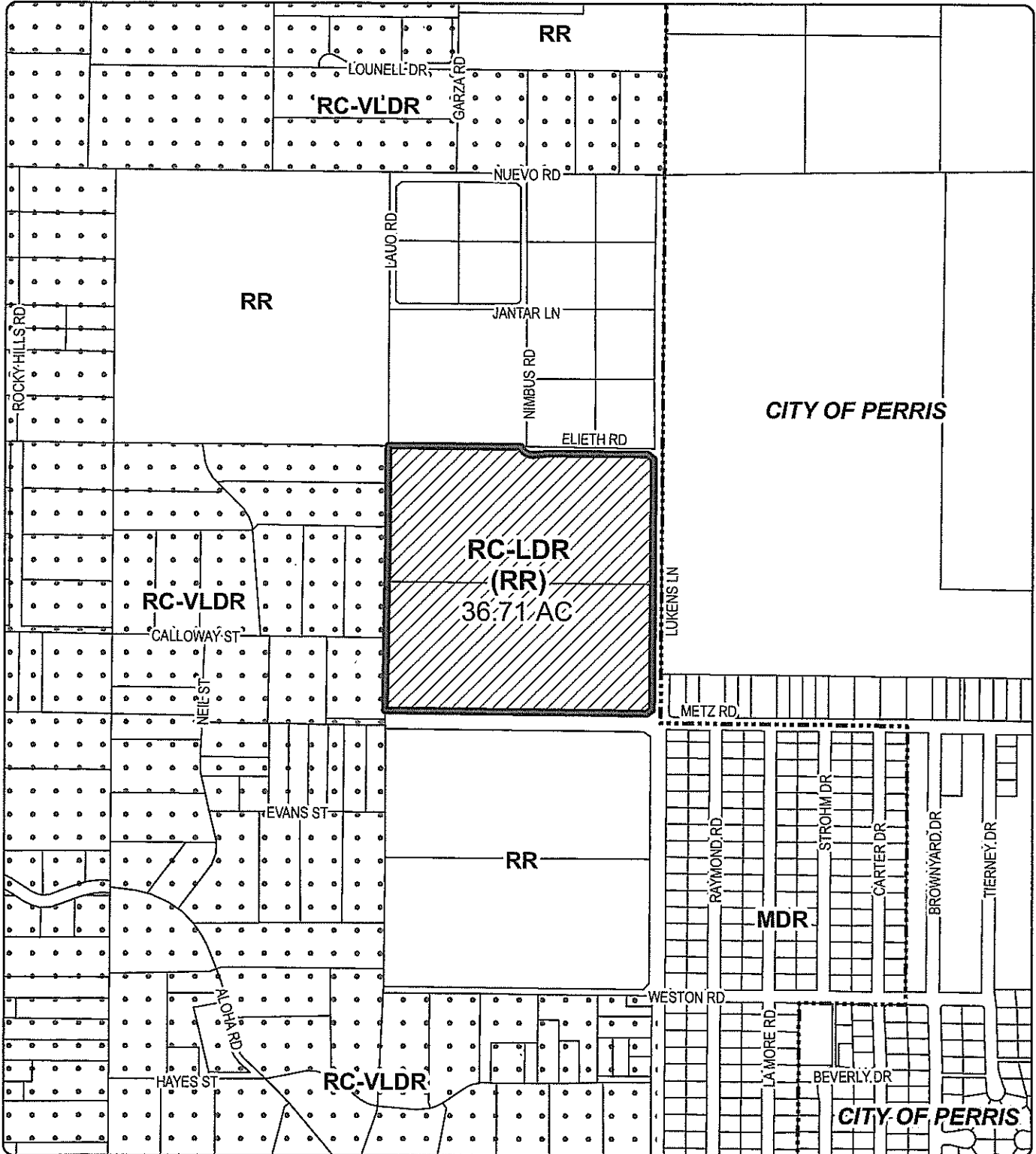
RIVERSIDE COUNTY PLANNING DEPARTMENT

GPA01022

PROPOSED GENERAL PLAN

Supervisor Stone
District: 3

Date Drawn: 3/15/2010
Exhibit 6

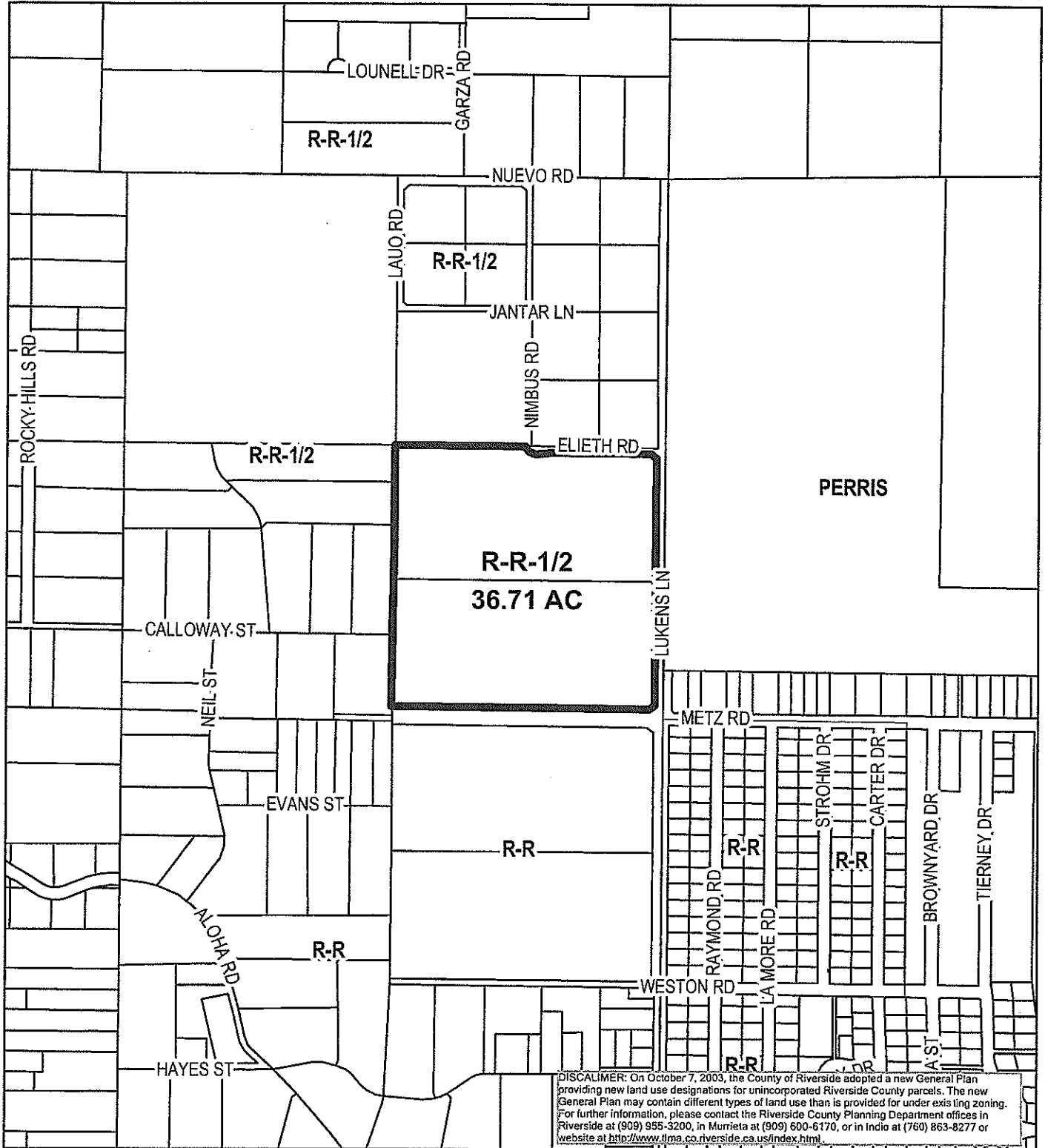


Zoning District: Mead Valley
Township/Range: T4SR4W
Section: 26

Assessors Bk. Pg. 323-10
Thomas Bros. Pg. 807 C1
Edition 2009

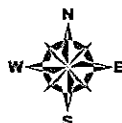


DISCLAIMER: On October 7, 2003, the County of Riverside adopted a new General Plan providing new land use designations for unincorporated Riverside County parcels. The new General Plan may contain different types of land use than is provided for under existing zoning. For further information, please contact the Riverside County Planning Department offices in Riverside at (951) 955-3200 (Western County), or in Indio at (760) 853-8277 (Eastern County) or website at <http://www.ftma.co.riverside.ca.us/index.html>

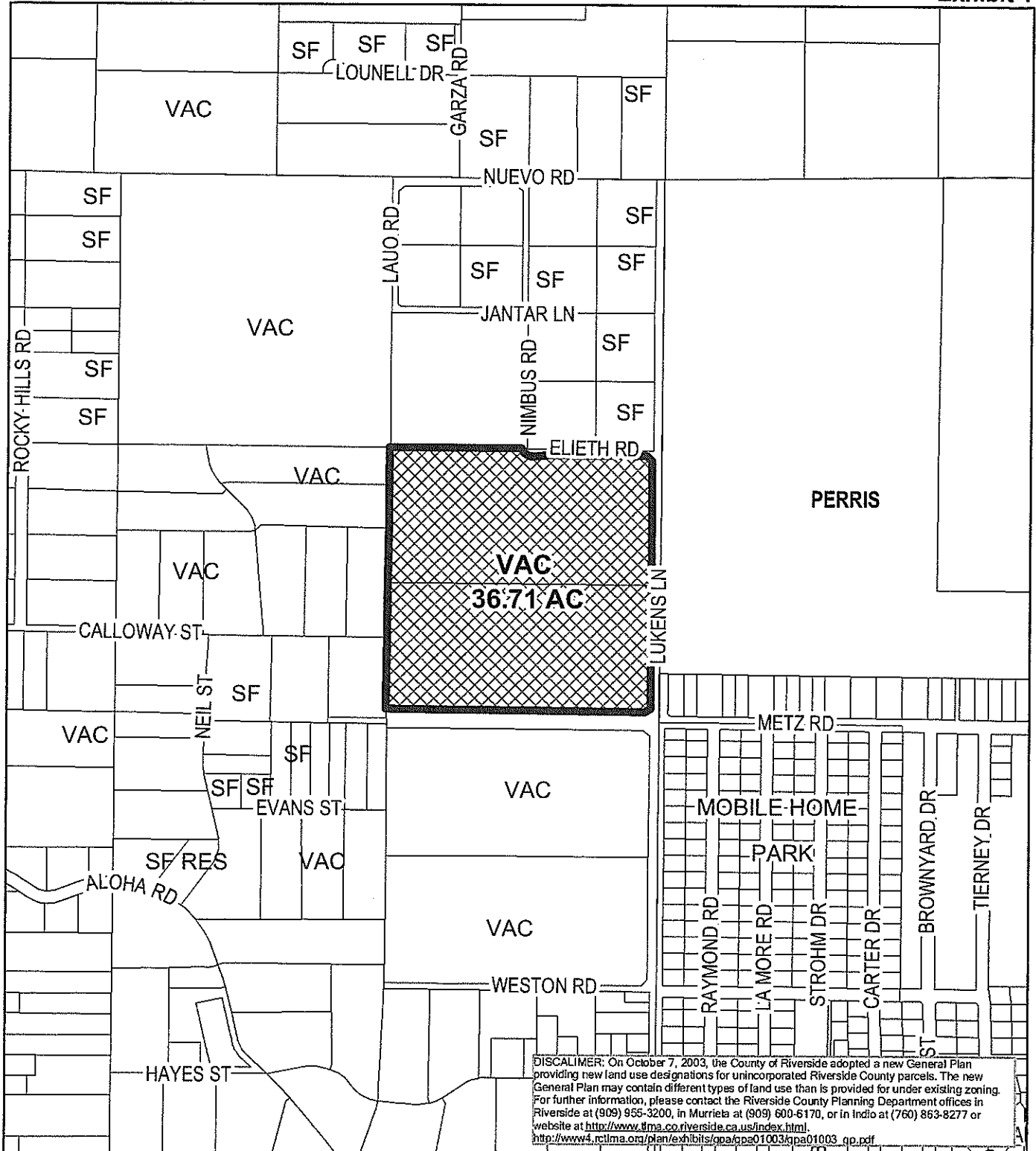


RIVERSIDE COUNTY PLANNING DEPARTMENT

Zone
 District: Mead Valley
 Township/Range: T4SR4W
 Section : 26



Assessors
 Bk. Pg. 323-10
 Thomas
 Bros. Pg. 807 C1



DISCALIMER: 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) 955-3200, in Murrieta at (909) 600-6170, or in Indio at (760) 863-8277 or website at http://www.rclma.org/plan/exhibits/gpa/gpa01003/gpa01003_gp.pdf

RIVERSIDE COUNTY PLANNING DEPARTMENT

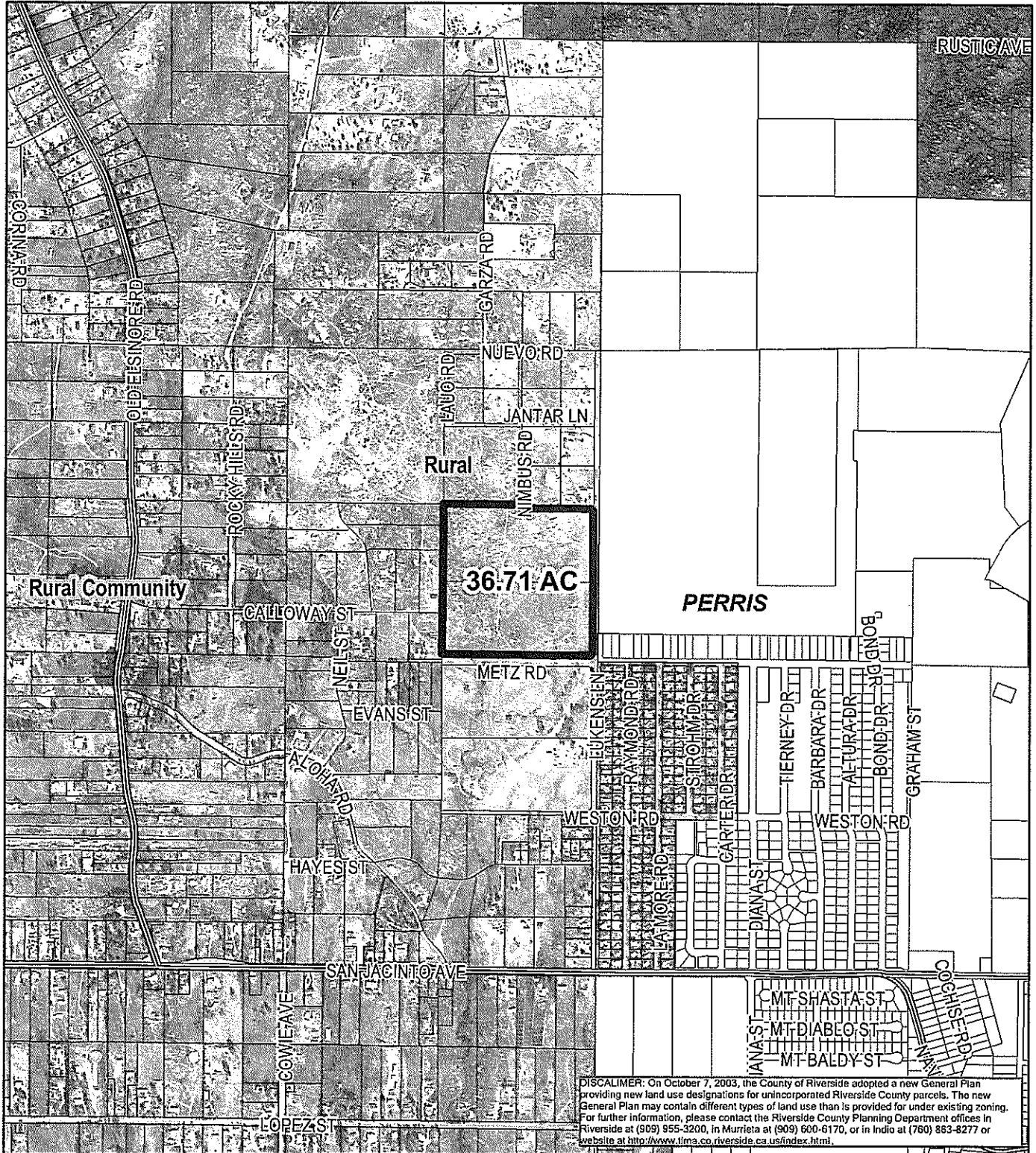
Zone
District: Mead Valley
Township/Range: T4SR4W
Section : 26



Assessors
Bk. Pg. 323-10
Thomas
Bros. Pg. 807 C1



DEVELOPMENT OPPORTUNITY



RIVERSIDE COUNTY PLANNING DEPARTMENT

District
 Plan: Mead Valley
 Township/Range: T4SR4W
 Section: 26

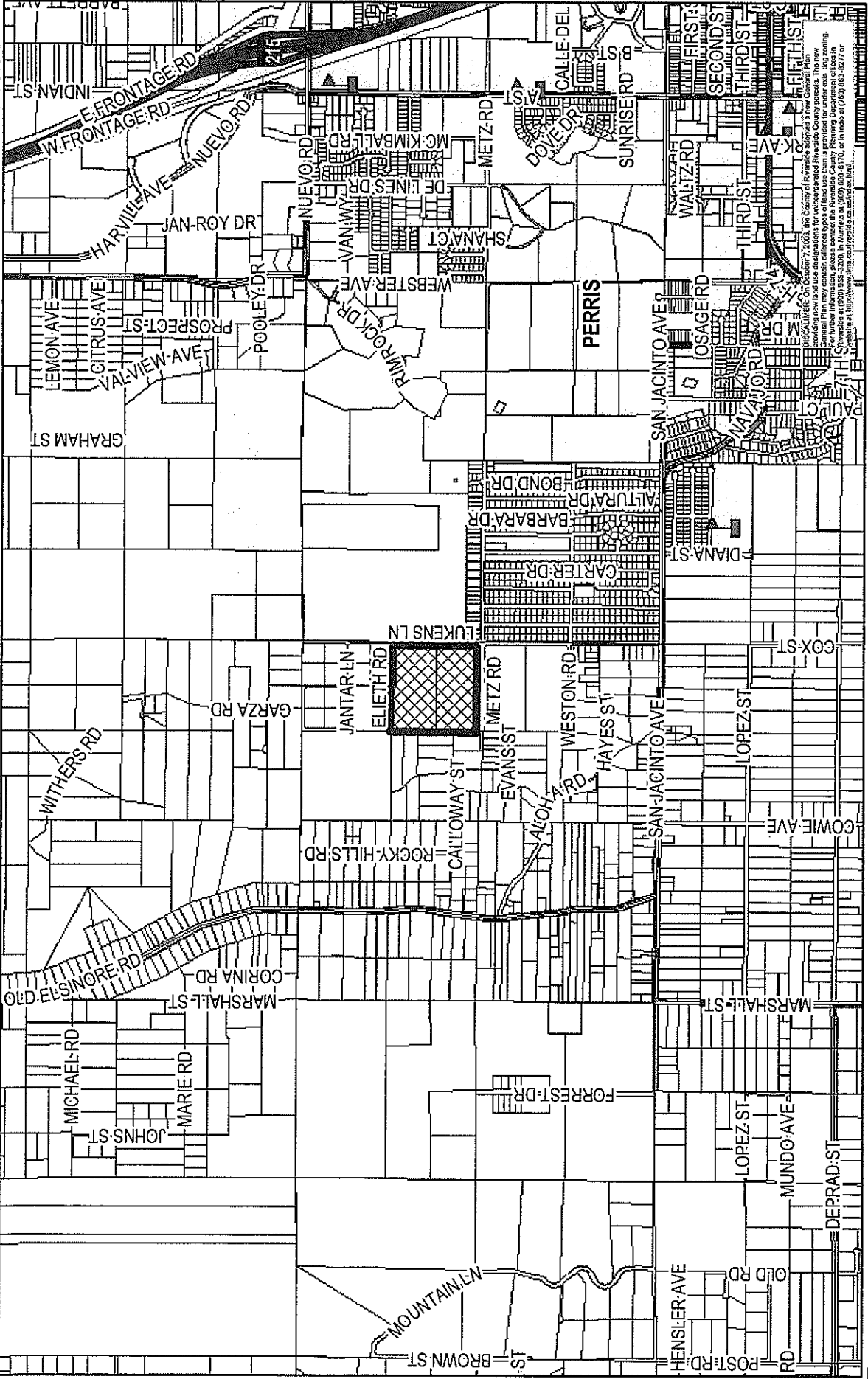


Assessors
 Bk. Pg. 323-10
 Thomas
 Bros. Pg. 807 C1

Supervisor Ashley
District 5
Date Drawn: 4/3/08

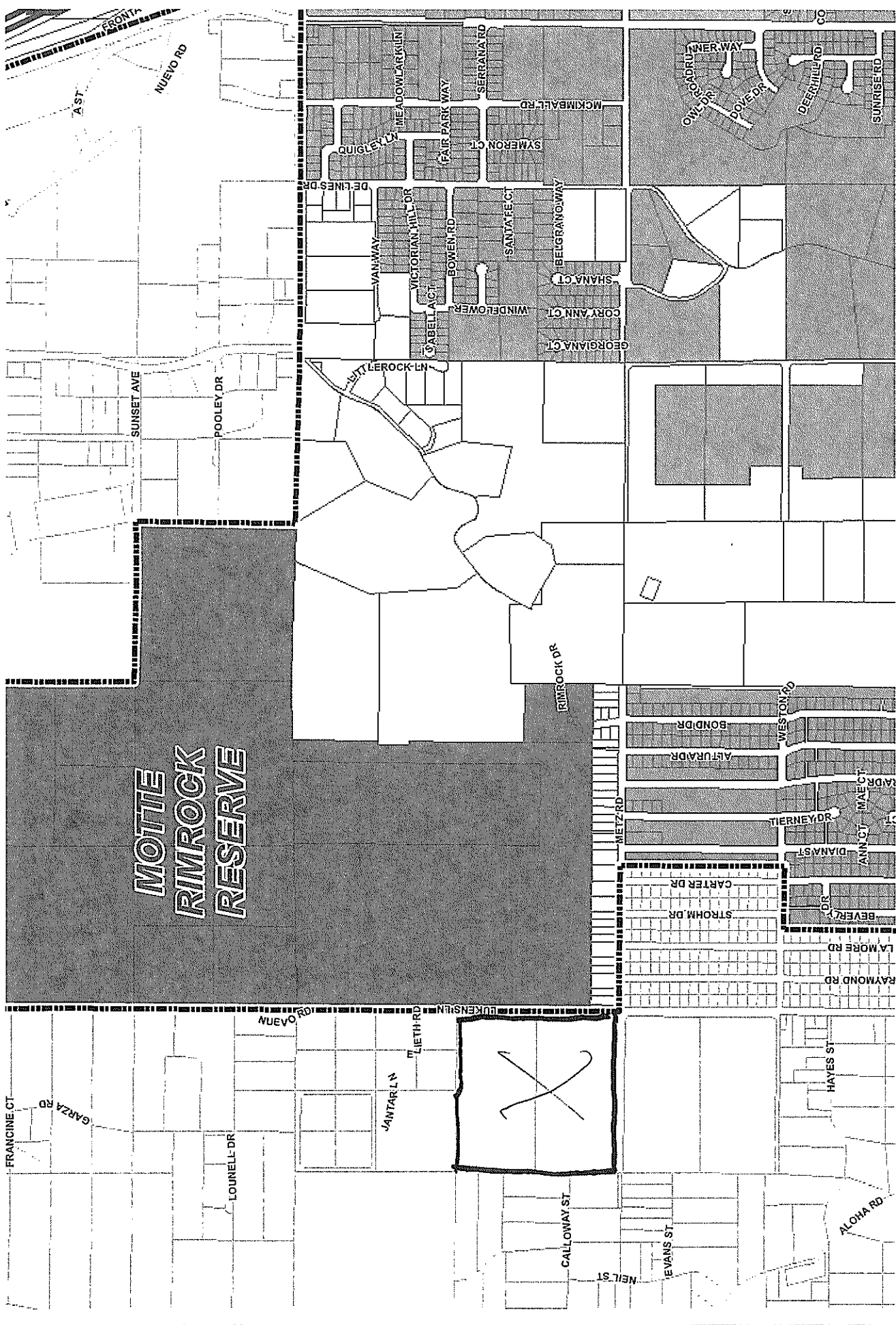
Gr-A01022 POLICY AREAS

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

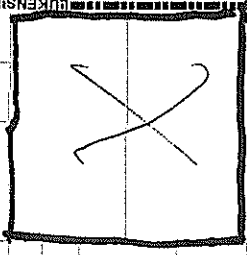


RIVERSIDE COUNTY PLANNING DEPARTMENT
Assessors
Bk. Pg. 323-10
Thomas
Bros. Pg. 807 C1

Zone
District: Mead Valley
Township/Range: T4SR4W
Section : 26



**MOTTIE
RIMROCK
RESERVE**



FRANCINE CT

GARZA RD

LOURELL DR

JANTAR LN

LIETH RD

ALLOWAY ST

NELLS ST

EVANS ST

HAYES ST

ALOHA RD

LOUANN

LUKENS LN

RIMROCK DR

WELZ RD

CARTER DR

STROMM DR

LA MORE RD

RAYMOND RD

HAYES ST

ALOHA RD

STROMM DR

CARTER DR

TIERNEY DR

DIANAST

BEVERLY DR

LA MORE RD

RAYMOND RD

HAYES ST

ALOHA RD

BOND DR

AFTURA DR

WESTON RD

ANN CT

WAE CT

BEVERLY DR

LA MORE RD

RAYMOND RD

HAYES ST

ALOHA RD

SHANK CT

CORY ANN CT

GEORGIANA CT

WINDFLOWER

SANTA FE CT

BELGRAVWAY

BOWEN RD

VICTORIAN HILL DR

CABELL AVE

VANWAY

DE LINES DR

MEADOWLARK LN

FAIR PARK WAY

SERRANA RD

MCKIMBALL RD

SYMERON CT

OWLER WAY

DOVE DR

DEERHILL RD

SUNRISE RD

FRONT ST

NEWYORK RD

FRONT ST

NEWYORK RD

FRONT ST

NEWYORK RD

FRONT ST

APPLICATION FOR AMENDMENT TO THE RIVERSIDE COUNTY GENERAL PLAN

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

We request to change the property's Land Use designation from RR to LDR for the following reasons:

1. Property is located adjacent to existing medium density residential property south of Metz Road and east of Lukens Lane.

2. Conversations with the Environmental Health Department indicate the property is not suitable for septic sewage disposal due to high ground water levels. Since septic is not allowed, the developer must construct an underground sewer system to serve the proposed development. LDR will allow a density higher than RR, and the higher density could help offset the cost of approximately 4,000 feet of offsite sewer and contribute to the cost of a sewage lift station.

3. Property is relatively flat and can support low density development with a minor grading operation.

4. Property is currently zoned R-R-1/2. The change to LDR would make the land use designation consistent with the zoning designation.

5. Property lies within the City of Perris Sphere of Influence (City - County boundary is the centerline of Lukens Lane). The City of Perris General Plan lists the property as 'R-20,000' (20,000 square foot minimum lot size). The change to LDR will be consistent with the city's designation.

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: NOT APPLICABLE Area Plan: _____

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

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

Medofer Engineering Inc.

Civil Engineering and Land Surveying

February 9, 2010

Tamara Harrison
County of Riverside Planning Department
4080 Lemon Street, 9th Floor
P.O. Box 1409
Riverside, CA 92502-1409

Subject: General Plan Amendment Case Number 1022
Supplemental Information

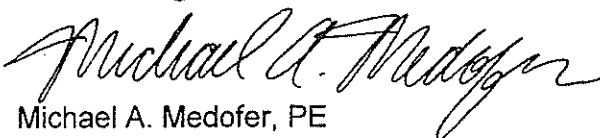
Tamara:

As requested by the Planning Department, Medofer Engineering has researched the status of the sewer project planned for the 'Enchanted Heights' development, as well as the timeline of the City of Perris General Plan. The following is a summary of the research information:

1. Conversation with Bonnie Wright, EMWD Grant Administrator:
 - a. Preliminary design is complete
 - b. Environmental documents are and are currently being reviewed by the State
 - c. Funding not secured at present
 - d. Trying to find funding from 3 or 4 different sources
 - e. Project is down on EMWD's capital improvement project priority list (due to funding and the current economic situation)
2. Conversation with John Ward, EMWD Engineering Program Manager:
 - a. Sewer project requires construction of a sewer lift station
 - b. Current design addresses 'Enchanted Heights' sewer issues only and does not consider service to other properties and/or future projects
 - c. Future projects need to file a 'Plan of Service' application with EMWD to determine sewer (and water) requirements
 - d. Possible for future projects to contribute funding to upsize sewer mains and increase the capacity of the proposed lift station
3. Conversation with Ilene Paik, City of Perris Assistant Planner:
 - a. R-20,000 designation for the Perris General Plan Sphere of Influence area was carried over from County documents dating back to October 14, 1991
 - b. Perris General Plan was updated April 26, 2005, and no changes were made to the Sphere of Influence designation
 - c. Perris General Plan was updated February 19, 2009, and no changes were made to the Sphere of Influence designation.

If you have any questions or wish to discuss this matter, please feel free to contact me at 909-816-5830.

Sincerely,



Michael A. Medofer, PE

gpa1022-supplemental-info-2-09-10.doc
28610 Midsummer Lane
Menifee, California 92584
Phone 909-816-5830
Fax 951-301-6792
medofereng@verizon.net

FAX MEMO

June 21, 2009

TO: Mike Harrod

Chantell Griffin, Planning Commission Secretary

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

RE: Items 7 and 9 (June 24, 2009)

Pages: 4 (including cover)

RECEIVED
JUL 21 2009
ADMINISTRATION
RIVERSIDE COUNTY
PLANNING DEPARTMENT

Distribution to Commissioners is appreciated.

Thank you

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



June 20, 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 7.0 and 9.0, General Plan Amendment Initiation Proceedings
 (June 24, 2009)**

Dear Chair and Commission Members:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPA proposals. For your information, EHL has submitted extensive comments on County-initiated GPA 960 as part of the General Plan Advisory Committee (GPAC) process.

Item 7.1, GPA 952 (REMAP)

Concur with original staff recommendation to deny initiation. This proposal would create large-scale urbanization on 736 acres in an area utterly unsuited to these uses, due to infrastructure and service deficiency, lack of water, fire hazard, and MSHCP Criteria Cells. No new circumstances justify the proposed foundation change, and any consideration of intensified uses in this region should be deferred to the Rural Village Overlay process ongoing within County-initiated GPA 960.

Item 7.2, GPA 1022 (Mead Valley)

Concur with original staff recommendation to deny initiation. There are no new circumstances to justify urbanization of an intact rural area that lacks services.

Item 7.3, 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 9.1, GPA 896 (Temescal)

Concur with staff recommendation to deny initiation. As proposed by the applicant, the GPA would be inconsistent with the MSHCP HANS determination. If the staff's alternative recommendation for development in the northern portion were to be accepted, there should first be an understanding as to how the proposed development and conservation areas will "fit" into MSHCP assembly for this region. While the HANS report may contain this information, it is not available in the documentation for this item. *Why can't the HANS determinations be posted for public review?*

Item 9.2. GPA 962. Mead Valley

No position. The site lies within MSHCP Criteria Cells. While a previous HANS determination showed that the western portion was not needed for conservation, there has been no evaluation of the eastern portion. However, it is unlikely that changing the designation from 1-acre lot Rural Community to CD Light Industrial will prejudice pre-serve assembly.

Item 9.3. GPA 1021 (Good Hope)

Concur with staff recommendation to deny initiation.

Item 9.4. GPA 1032 (Gavilan Hills)

Disagree with staff recommendation to initiate. This 57-acre site is part of an intact block of Rural land and forms a *well-defined edge* with the estate lots to the north. The applicant wishes various Rural Community designations and the staff recommendation is to "bargain" with the applicant and grant 2-acre estate lots. However, to redesignate this land in *either* way would encroach onto Rural without any substantial change in circumstances as justification. Rather, it would grant a special *exception* for one applicant, show favoritism, and set a precedent that would lead to progressive loss of Rural lands. The staff recommendation is an example of the lack of planning rigor that has too-often characterized the landowner-initiated process. *Furthermore, the staff report is deficient in failing to indicate whether MSHCP Criteria Cells are affected.*

Item 9.5. GPA 1038 (Gavilan Hills)

Disagree with staff recommendation to initiate. This is a massive proposal to redesignate 365 acres of intact Rural land to highly inefficient, greenhouse gas-intensive 2-acre estate 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 utter lack of commitment to the integrity of the Rural designations, and as in the case above, would grant a special *exception* for one applicant, show favoritism, 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 this absence shows an unacceptable carelessness in the Planning Dept's approach to these GPAs.*

In conclusion, we are disappointed that some of the staff recommendations show a lack of planning rigor and fail to comply with the Administrative Element Certainty System. We urge the Commission to take a hard look at these cases and act to maintain Rural and habitat areas. Thank you for considering our views, and we look forward to working with you as the Fire-Year Update proceeds.

Sincerely,



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Executive Director

Electronic cc: Board Offices
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Interested parties

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