SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA 326B

REVIEWED BY EXECUTIVE OFFICE
DATE 6/23/10 Tina Grande
Departmental Concurrence

FROM: TLMA - Planning Department

SUBMITTAL DATE: June 17, 2010

SUBJECT: GENERAL PLAN AMENDMENT NO. 985 – Foundation-Regular – Applicant: Bob Taghdriri – 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,
Ron Goldman
Planning Director

Initials:
RG:th

(continued on attached page)

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

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Buster, seconded by Supervisor Stone and duly carried by unanimous vote, IT WAS ORDERED that the above matter is approved as recommended.

Ayes:	Buster, Tavaglione, Stone, Benoit, and Ashley
Nays:	None
Absent:	None
Date:	July 13, 2010
xc:	Planning, Applicant

Kecia Harper-Ihem
Clerk of the Board
By: Deputy

Prev. Agn. Ref.	District: First	Agenda Number: 15.1

Revised 3/04/10 by R. Juarez - Y:\Advanced Planning\GPA FOUNDATION COMPONENT REVIEW\GPA Cases\GPA 985\BOS\GPA 985 Form 11P - 2010.doc

ATTACHMENTS FILED WITH THE CLERK OF THE BOARD

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.

MINUTES OF THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA

15.1

On motion of Supervisor Buster, seconded by Supervisor Stone and duly carried, IT WAS ORDERED that the recommendation from Transportation & Land Management Agency/Planning regarding General Plan Amendment No. 985 (FOUNDATION – REGULAR) – Bob Taghdriri/Grant Becklund – Lakeland Village Zoning District – Elsinore Area Plan – **1st District**. The Planning Director recommends that the Board adopt an order initiating proceedings for the above-referenced general plan amendment to amend the 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 to Medium High Density Residential (allowing 5-8 dwelling units per acre) is continued to Tuesday, July 13, 2010 at 9:00 a.m.

Roll Call:

Ayes:	Buster, Tavaglione, Stone and Benoit
Nays:	None
Absent:	Ashley

I hereby certify that the foregoing is a full true, and correct copy of an order made and entered on June 29, 2010 of Supervisors Minutes.

WITNESS my hand and the seal of the Board of Supervisors
Dated: June 29, 2010
Kecia Harper-Ihem, Clerk of the Board of Supervisors, in
(seal) and for the County of Riverside, State of California.

By: _____ Deputy

AGENDA NO.
15.1

xc: Planning, COB

COUNTY OF RIVERSIDE

TRANSPORTATION AND LAND MANAGEMENT AGENCY

George A. Johnson · Agency Director

Planning Department

Ron Goldman · Planning Director

3.26.B

DATE: June 15, 2010

TO: Clerk of the Board of Supervisors

FROM: Planning Department - Riverside Office

SUBJECT: General Plan Amendment No. 985

(Charge your time to these case numbers)

The attached item(s) require the following action(s) by the Board of Supervisors:

- ☐ Place on Administrative Action (Receive & File; EOT)
  - ☐ Labels provided If Set For Hearing
    - ☐ 10 Day ☐ 20 Day ☐ 30 day
- ☐ Place on Consent Calendar
- ☐ Place on Policy Calendar (Resolutions; Ordinances; PNC)
- ☒ Place on Section Initiation Proceeding (GPIP)
- ☐ Set for Hearing (Legislative Action Required; CZ, GPA, SP, SPA)
- ☐ Publish in Newspaper:
  - **SELECT Advertisement**
- ☐ **SELECT CEQA Determination**
  - ☐ 10 Day ☐ 20 Day ☐ 30 day
- ☐ Notify Property Owners (app/agencies/property owner labels provided)

Controversial: ☐ YES ☒ NO

Designate Newspaper used by Planning Department for Notice of Hearing: NONE - GPIP

Please schedule on the June 29, 2010 BOS Agenda

Riverside Office · 4080 Lemon Street, 9th Floor
P.O. Box 1409, Riverside, California 92502-1409
(951) 955-3200 · Fax (951) 955-3157

Desert Office · 38686 El Cerrito Road
Palm Desert, California 92211
(760) 863-8277 · Fax (760) 863-7555

6-7-10

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@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 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@rctlma.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
Supervisorial 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.

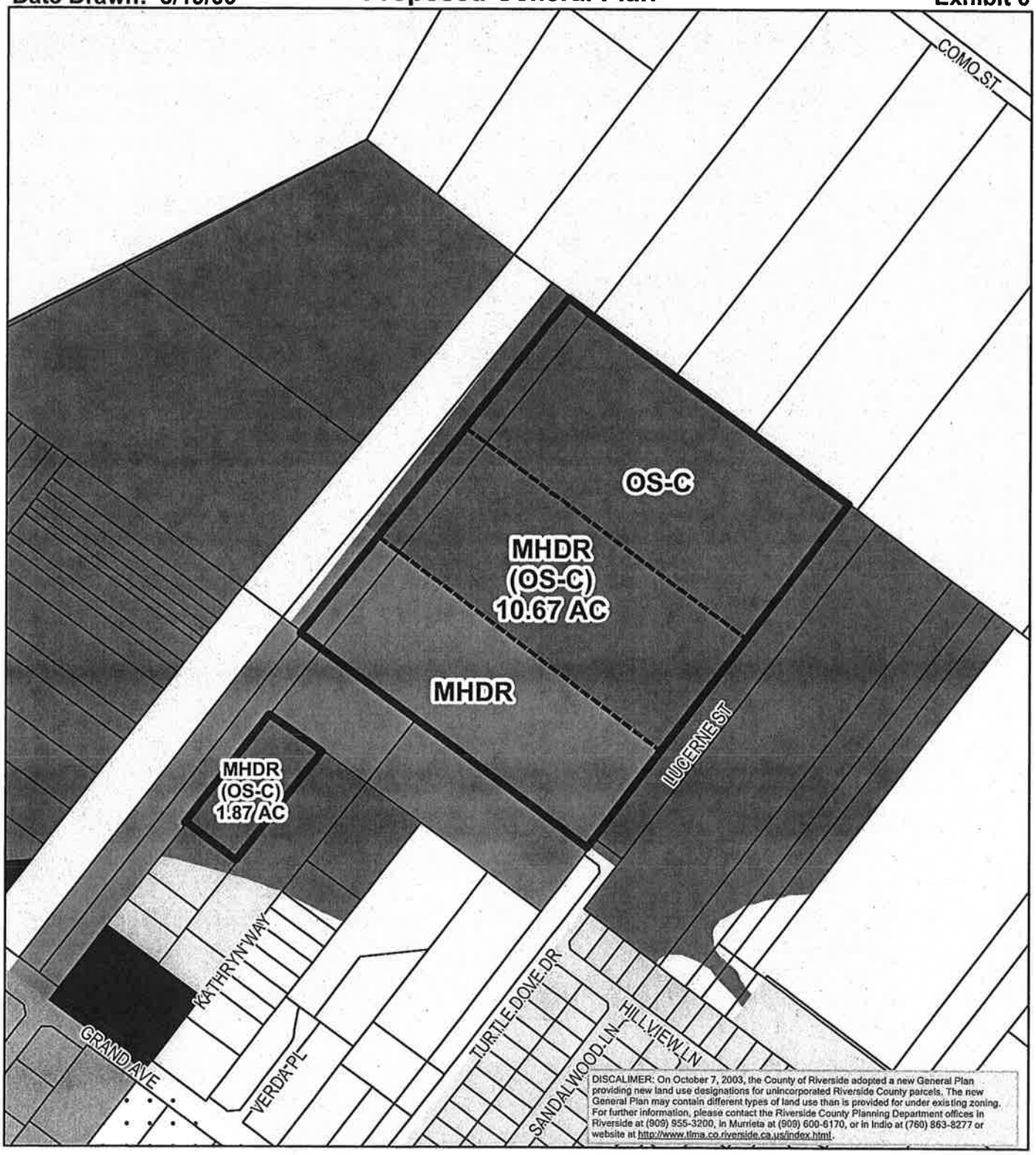
3. Deposit Based Fees charged to this project, as of the time of staff report preparation, total $8,881.54.

Supervisor Buster
District 1
Date Drawn: 3/19/09

GPA00985

Proposed General Plan

Planner: Mike Harrod
Date: 4/15/09
Exhibit 6



RIVERSIDE COUNTY PLANNING DEPARTMENT

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

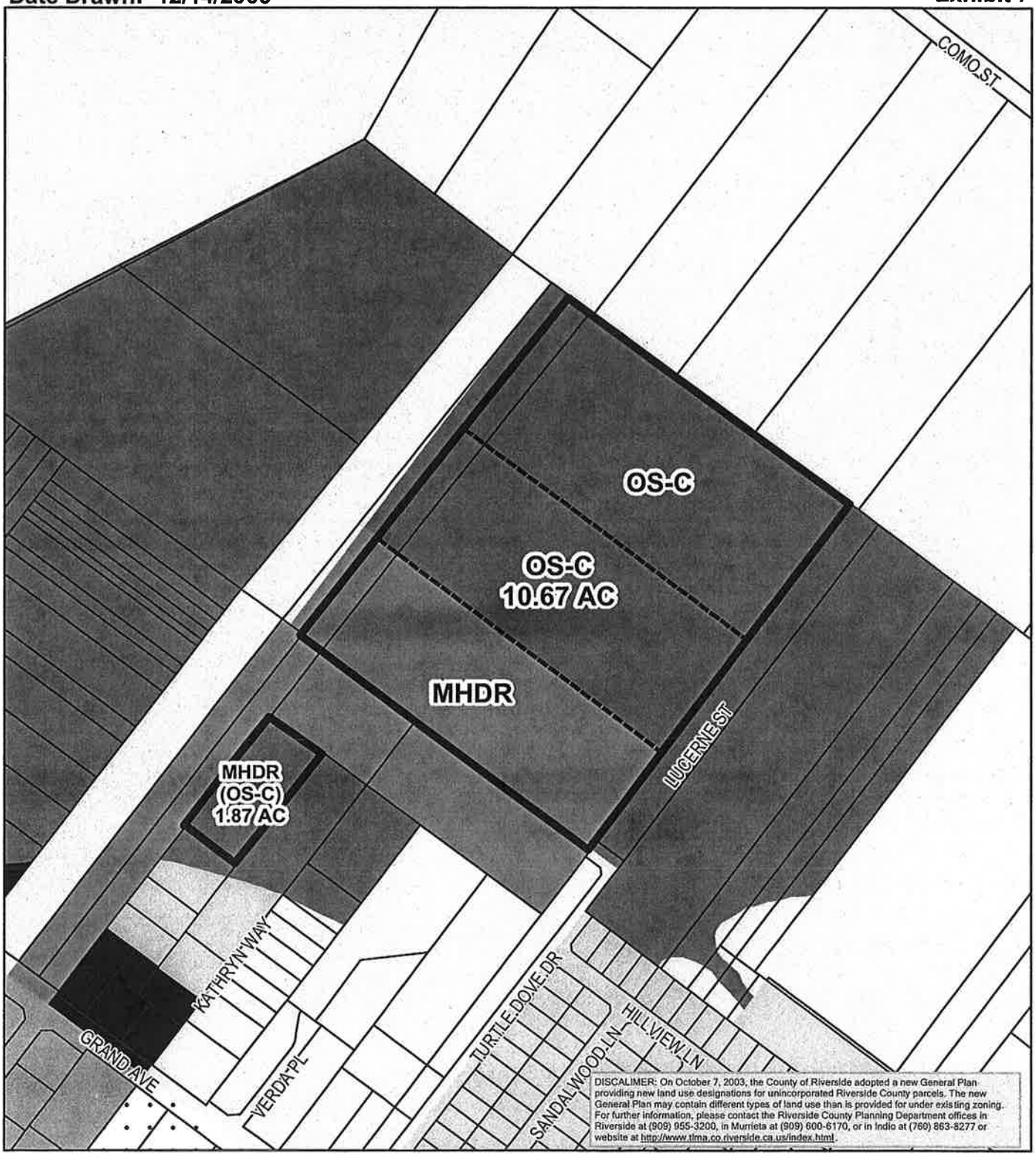
Assessors
Bk. Pg. 317-09
Thomas
Bros. Pg. 896 E3

Supervisor Buster
District 1
Date Drawn: 12/14/2009

GPA00985

Recommended General Plan

Planner: Mike Harrod
Date: 12/2009
Exhibit 7



RIVERSIDE COUNTY PLANNING DEPARTMENT

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

N
W E
S

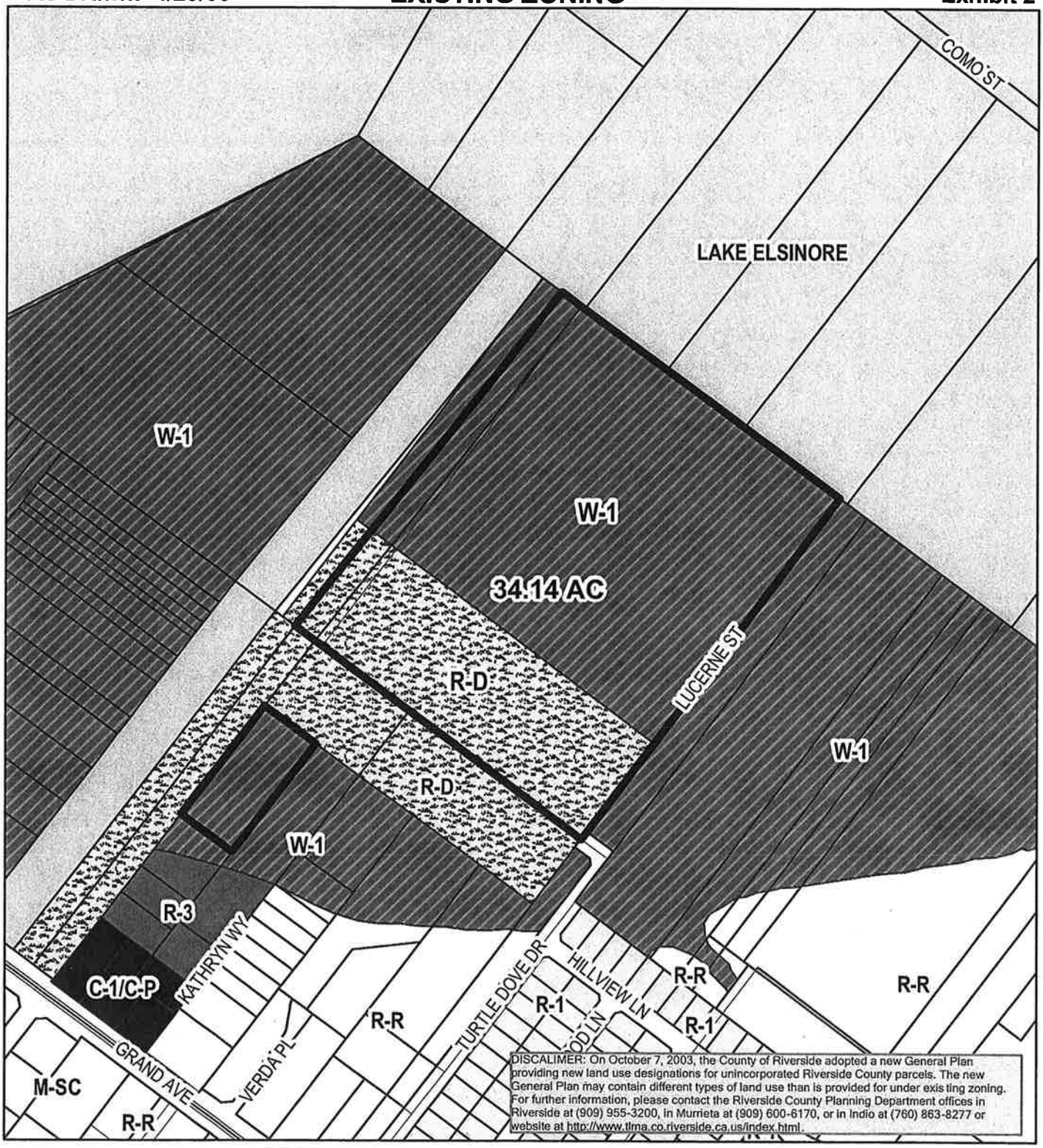
0 255 510 1,020 1,530
Feet

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

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

GPA00985
EXISTING ZONING

Planner: Amy Aldana
Date: 3/1/08
Exhibit 2



RIVERSIDE COUNTY PLANNING DEPARTMENT

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

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

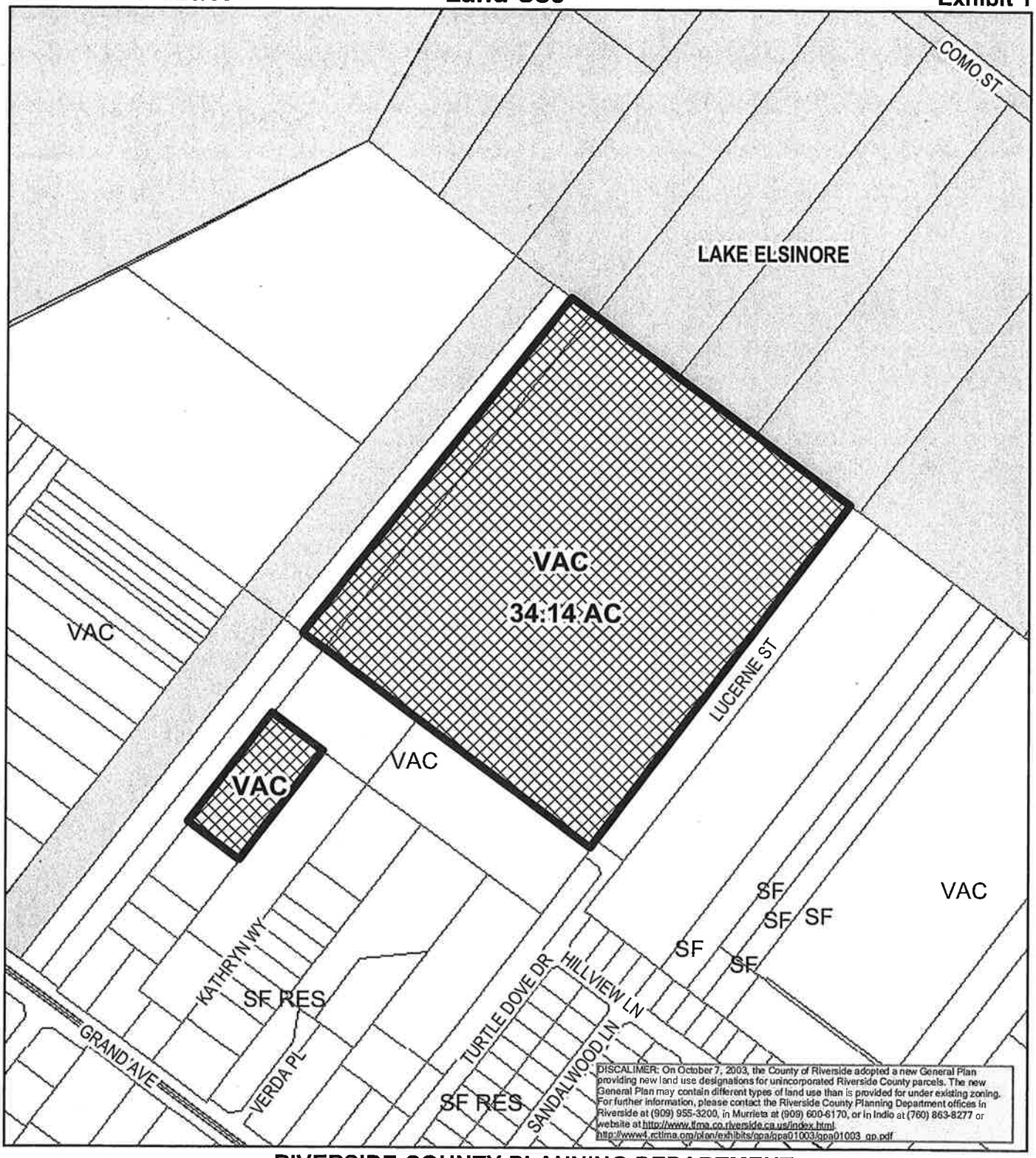
N
W E
S

0 325 650 1,300 1,950
Feet

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

GPA00985
Land Use

Planner: Amy Aldana
Date: 3/14/08
Exhibit 1



RIVERSIDE COUNTY PLANNING DEPARTMENT

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

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

0 305 610 1,220 1,830
Feet

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

GPA00985
DEVELOPMENT OPPORTUNITY

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

RIVERSIDE COUNTY PLANNING DEPARTMENT

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

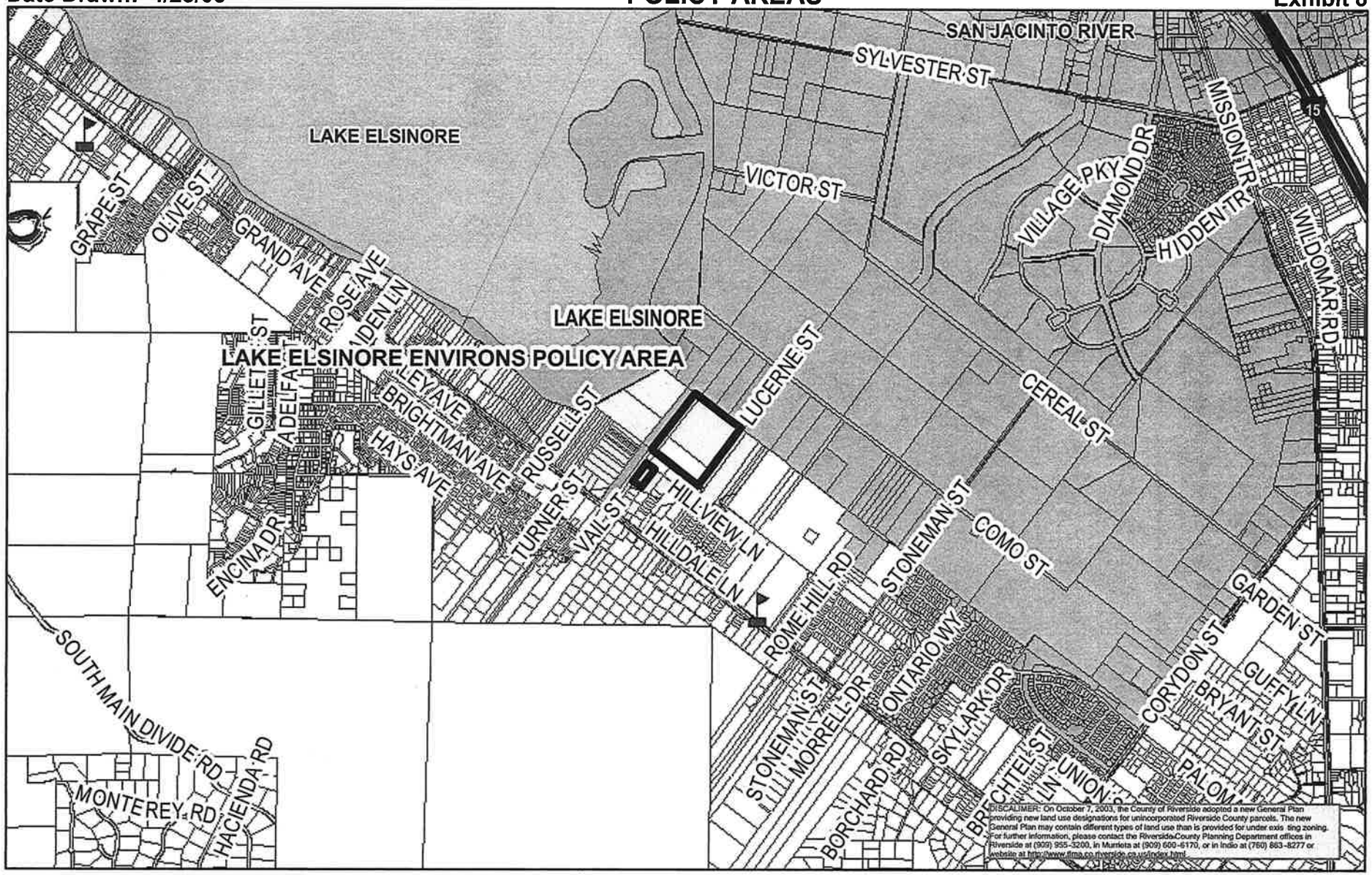
Assessors
Bk. Pg. 317-09
Thomas
Bros. Pg. 896 E3

0 490 980 1,960 2,940
Feet

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

GPA00985
POLICY AREAS

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



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

RIVERSIDE COUNTY PLANNING DEPARTMENT

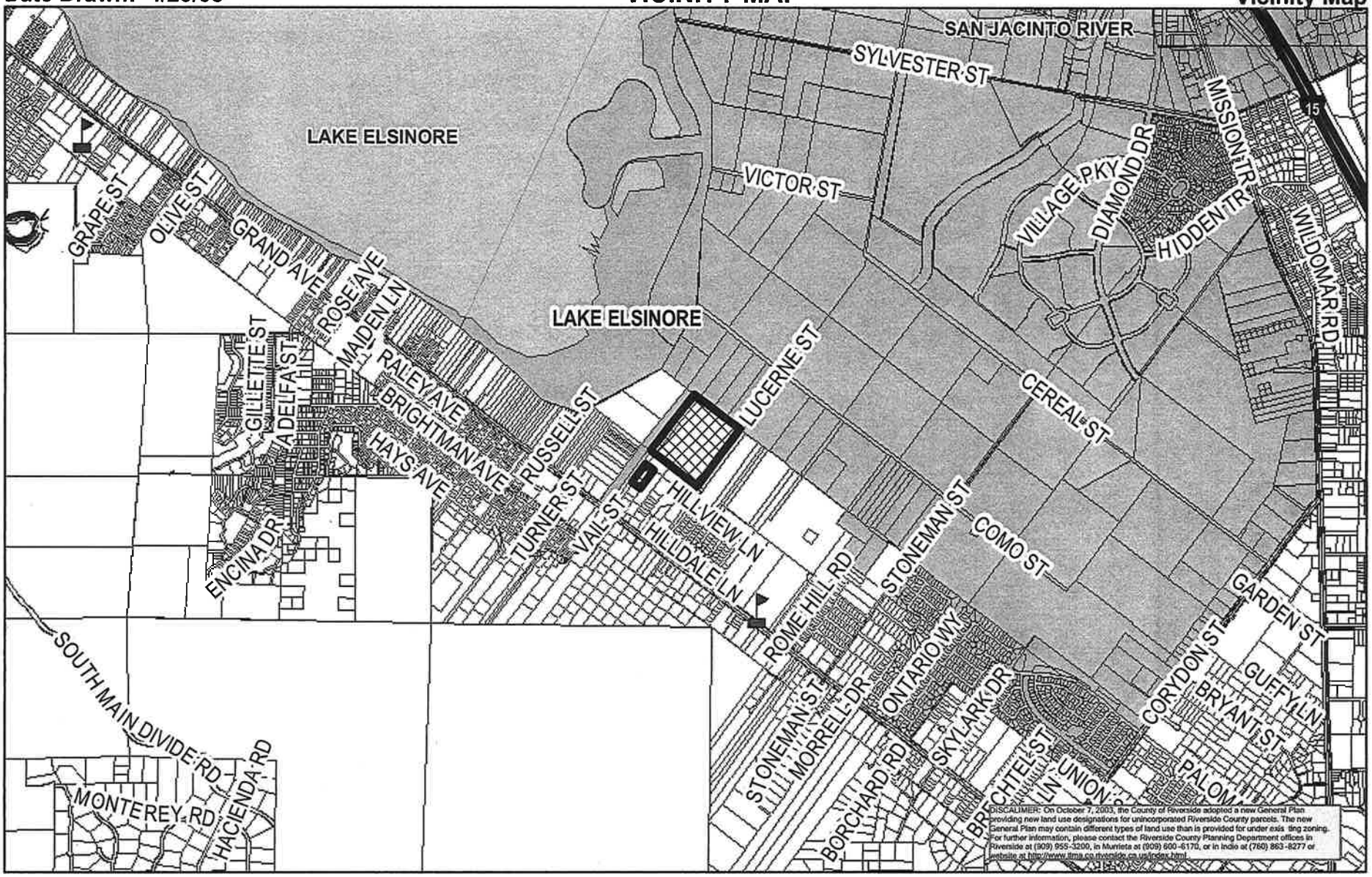
Assessors
Bk. Pg. 317-09
Thomas
Bros. Pg. 896 E3

0 3,000 6,000 12,000 18,000
Feet

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

GPA00985
VICINITY MAP

Planner: Amy Aldana
Date: 3/14/08
Vicinity Map



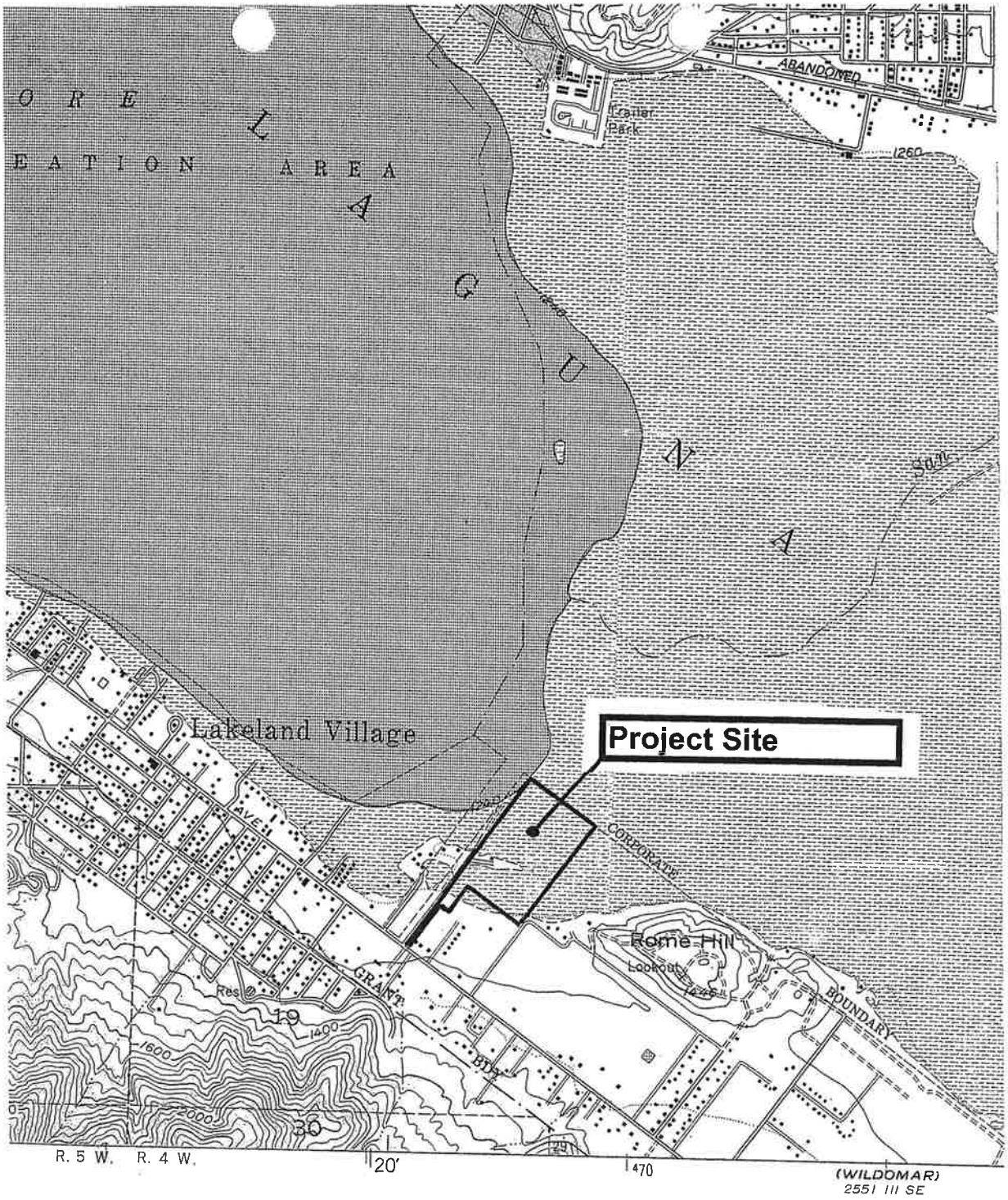
Zone
District: Lakeland Village
Township/Range: T6SR4W
Section : 19

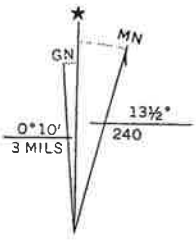
RIVERSIDE COUNTY PLANNING DEPARTMENT

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

0 3,000 6,000 12,000 18,000
Feet

Project Site
©1997-2006 AirPhotoUSA





SCALE 1:24000

1 ½ 0

1000 0 1000 2000 3000 4000

1 .5 0

CONTOUR INTERVAL 40 FEE

LAKE ELSINORE, CALIF.

(FORMERLY ELSINORE)

33117-F3-TF-024

1953

PHOTOREVISED 1988

DMA 2551 III NE–SERIES V895

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 discontiguous 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 step 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
George Johnson, TLMA
Ron Goldman, Planning Dept.
Carolyn Luna, Environmental Programs Dept.
Interested parties

Bob Taghdiri
3112 Bostonian Drive
Los Alamitos, CA 90720
Applicant- GPA 985

Grant Becklund
30811 Garbani Road
Winchester, CA 92596
Engineer- GPA985

Carlos Lopez
1713 West Gary Street
Santa Ana, CA 92704

Use Avery® Template 5160®

Feed Paper — Bend along line to expose Pop-Up Edge™

AVERY® 5160®

Bob Taghdiri
3112 Bostonian Drive
Los Alamitos, CA 90720
Applicant- GPA 985

Grant Becklund
30811 Garbani Road
Winchester, CA 92596
Engineer- GPA985

Carlos Lopez
1713 West Gary Street
Santa Ana, CA 92704

Étiquettes faciles à peler
Utilisez le gabarit AVERY® 5160®

FAX MEMO

June 27, 2010

TO: Clerk of the Board

Supervisor Bob Buster (ATTN: Dave Stahovich)

Supervisor John Tavaglione (ATTN: John Field)

Chairman Jeff Stone (ATTN: Olivia Barnes)

Supervisor John J. Benoit (ATTN: Mike Gialdini)

Chairman Marion Ashley (ATTN: Darcy Kuenzi)

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

RE: Agenda Item 15, June 29, 2010

PAGES: 4 (including cover)

6/29/2010 15.1

2010-Oc-101541

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

June 27, 2010

VIA FASCIMILE AND ELECTRONIC MAIL

Chairman Marion Ashley
Riverside County Board of Supervisors
4080 Lemon Street, 5th Floor
Riverside, CA 92501

RE: Item 15, General Plan Amendment Initiation Proceedings (June 29, 2010)

Dear Chairman Ashley and Members of the Board:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPAs. We urge that the integrity of the Foundation system be upheld, and that therefore that staff recommendations not be uniformly followed.

Item 15.1, GPA 985 (Elsinore)

Request additional information. Apparently, the proposal has been amended to limit conversion to Community Development to an 1.87-acre portion of a 34-acre site subject to flood hazard. We urge you to carefully evaluate any assurances that have been offered by the Flood Control District, including the effects of "flood proofing" on other properties. Also, no information has been provided as to whether MSHCP objectives would be prejudiced by the more limited proposal.

Item 15.2, GPA 988 (Elsinore)

Concur with staff recommendation to deny initiation. This 83-acre 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 15.3, GPA 1042 (SWAP)

Concur with staff recommendation to deny initiation. As noted in the staff report, the proposed commercial use of this 37-acre site is inconsistent with the vision and surrounding area, and no new circumstances justify new commercial in this location. Furthermore, the site falls within a portion of an MSHCP Criteria Cell needed to establish habitat connectivity, and the proposed intensification may conflict with the MSHCP.

Item 15.4, GPA 946 (Winchester)

Disagree with applicant's original proposal and with staff's modified recommendation for initiation. To change the designation of this large, 176-acre property from Rural Community to Community Development – or to *facilitate* such future conversion via staff's modified recommendation – are *both* inconsistent with maintaining the current rural policy area. There is also no MSHCP analysis. The larger question is that no absorption study has demonstrated the need for additional Community Development or, even if so, whether this is an optimal location. Indeed, the location appears discontiguous from other development and would represent a piecemeal and disorderly pattern of urbanization that maximizes greenhouse gas emissions.

Item 15.5, GPA 974 (French Valley)

Disagree with staff recommendation to initiate. For unspecified reasons, staff has *reversed* its prior sound recommendation for denial. The proposal would breach a Rural "Community Separator" for the City of Menifee and contribute to a larger group of unnecessary proposed urban conversions. No absorption study based upon existing General Plan capacity justifies additional development.

Item 15.6, GPA 976 (Winchester)

Disagree with staff recommendation to inititate. This 272-acre proposal is part of an intact Rural area that serves as a community separator. Urban conversion is being recommended *despite the complete absence of an absorption study showing that any additional urban land is actually needed.* Staff's recommendation indicates a substantial failure of the landowner-initiated GPA process to stabilize land uses and direct urban growth to municipalities and an orderly process of annexation. Rather, initiation of this proposal would show that piecemeal, applicant-driven GPAs continue to determine land use in the unincorporated area. Staff's proposal to require a specific plan for this and nearby GPAs does not cure the underlying planning failure. Specific plans are a prime historic engine of sprawl in the unincorporated area.

Item 15.7, GPA 1000 (Southwest Area Plan)

Request additional information. When this 379-acre GPA was before the Planning Commission, the proposal was to convert this rugged and fire-prone rural location to Specific Plan/Community Development. Staff recommended denial due to discontiguity from urban infrastructure and services and because conversion "would be contrary to the existing character and land use pattern in the area." Now, an amended proposal seeks a less dense Agriculture designation, consistent with proposed expansion of the Citrus Vineyard Policy Area. *However, such expansion has not been approved as yet.* GPA initiation may be premature. Should Policy Area expansion *precede* redesignation? What is the proper sequence so as not to prejudice objective Policy Area decision-making, consideration of water supply, etc? Also, if redesignation were approved at this time, what prevents urban conversion under the loophole-ridden Agriculture conversion process, especially in the event that Policy Area expansion does not occur? Given the applicant's previous request for far more intense development than

currently allowed, the possibility of an attempt to circumvent the Certainty System via an Agriculture designation warrants consideration.

Item 15.8, GPA 1099 (Southwest Area Plan)

Concur with staff recommendation to decline to initiate. To change this 23-acre site from Rural Community to Community Development Medium Density Residential would create an incompatible "spot zone." Greenhouse gas emissions would increase by placing more residents distant from employment centers. Finally, the thorough staff analysis has conclusively shown that the required findings cannot be met:

> Staff concludes that the applicant's proposed findings are inadequate for the purposes of satisfying the requirements found under Riverside County Ordinance 348, Section 2.6.f relating to General Plan Foundation Component Extraordinary Amendments.

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

With best regards,

Dan Silver, MD
Executive Director

Electronic cc: Board Offices
George Johnson
Ron Goldman
Damian Meins
Jerry Jolliffe
Mike Harrod
Katherine Lind
Carolyn Luna
Charles Landry

June 27, 2010

VIA FASCIMILE AND ELECTRONIC MAIL

Chairman Marion Ashley
Riverside County Board of Supervisors
4080 Lemon Street, 5th Floor
Riverside, CA 92501

RE: Item 15, General Plan Amendment Initiation Proceedings (June 29, 2010)

Dear Chairman Ashley and Members of the Board:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPAs. We urge that the integrity of the Foundation system be upheld, and that therefore that staff recommendations not be uniformly followed.

Item 15.1, GPA 985 (Elsinore)

Request additional information. Apparently, the proposal has been amended to limit conversion to Community Development to an 1.87-acre portion of a 34-acre site subject to flood hazard. We urge you to carefully evaluate any assurances that have been offered by the Flood Control District, including the effects of "flood proofing" on other properties. Also, no information has been provided as to whether MSHCP objectives would be prejudiced by the more limited proposal.

Item 15.2, GPA 988 (Elsinore)

Concur with staff recommendation to deny initiation. This 83-acre 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 15.3, GPA 1042 (SWAP)

Concur with staff recommendation to deny initiation. As noted in the staff report, the proposed commercial use of this 37-acre site is inconsistent with the vision and surrounding area, and no new circumstances justify new commercial in this location. Furthermore, the site falls within a portion of an MSHCP Criteria Cell needed to establish habitat connectivity, and the proposed intensification may conflict with the MSHCP.

Item 15.4, GPA 946 (Winchester)

Disagree with applicant's original proposal and with staff's modified recommendation for initiation. To change the designation of this large, 176-acre property from Rural Community to Community Development – or to *facilitate* such future conversion via staff's modified recommendation – are *both* inconsistent with maintaining the current rural policy area. There is also no MSHCP analysis. The larger question is that no absorption study has demonstrated the need for additional Community Development or, even if so, whether this is an optimal location. Indeed, the location appears discontiguous from other development and would represent a piecemeal and disorderly pattern of urbanization that maximizes greenhouse gas emissions.

Item 15.5, GPA 974 (French Valley)

Disagree with staff recommendation to initiate. For unspecified reasons, staff has *reversed* its prior sound recommendation for denial. The proposal would breach a Rural "Community Separator" for the City of Menifee and contribute to a larger group of unnecessary proposed urban conversions. No absorption study based upon existing General Plan capacity justifies additional development.

Item 15.6, GPA 976 (Winchester)

Disagree with staff recommendation to inititate. This 272-acre proposal is part of an intact Rural area that serves as a community separator. Urban conversion is being recommended *despite the complete absence of an absorption study showing that any additional urban land is actually needed.* Staff's recommendation indicates a substantial failure of the landowner-initiated GPA process to stabilize land uses and direct urban growth to municipalities and an orderly process of annexation. Rather, initiation of this proposal would show that piecemeal, applicant-driven GPAs continue to determine land use in the unincorporated area. Staff's proposal to require a specific plan for this and nearby GPAs does not cure the underlying planning failure. Specific plans are a prime historic engine of sprawl in the unincorporated area.

Item 15.7, GPA 1000 (Southwest Area Plan)

Request additional information. When this 379-acre GPA was before the Planning Commission, the proposal was to convert this rugged and fire-prone rural location to Specific Plan/Community Development. Staff recommended denial due to discontiguity from urban infrastructure and services and because conversion "would be contrary to the existing character and land use pattern in the area." Now, an amended proposal seeks a less dense Agriculture designation, consistent with proposed expansion of the Citrus Vineyard Policy Area. *However, such expansion has not been approved as yet.* GPA initiation may be premature. Should Policy Area expansion *precede* redesignation? What is the proper sequence so as not to prejudice objective Policy Area decision-making, consideration of water supply, etc? Also, if redesignation were approved at this time, what prevents urban conversion under the loophole-ridden Agriculture conversion process, especially in the event that Policy Area expansion does not occur? Given the applicant's previous request for far more intense development than

currently allowed, the possibility of an attempt to circumvent the Certainty System via an Agriculture designation warrants consideration.

Item 15.8, GPA 1099 (Southwest Area Plan)

Concur with staff recommendation to decline to initiate. To change this 23-acre site from Rural Community to Community Development Medium Density Residential would create an incompatible "spot zone." Greenhouse gas emissions would increase by placing more residents distant from employment centers. Finally, the thorough staff analysis has conclusively shown that the required findings cannot be met:

> Staff concludes that the applicant's proposed findings are inadequate for the purposes of satisfying the requirements found under Riverside County Ordinance 348, Section 2.6.f relating to General Plan Foundation Component Extraordinary Amendments.

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

With best regards,

Dan Silver, MD
Executive Director

Electronic cc: Board Offices
George Johnson
Ron Goldman
Damian Meins
Jerry Jolliffe
Mike Harrod
Katherine Lind
Carolyn Luna
Charles Landry

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

June 21, 2010

VIA FASCIMILE AND ELECTRONIC MAIL

Chairman Marion Ashley
Riverside County Board of Supervisors
4080 Lemon Street, 5th Floor
Riverside, CA 92501

RE: Item 15, General Plan Amendment Initiation Proceedings (June 22, 2010)

Dear Chairman Ashley and Members of the Board:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPA. Critical planning issues, such has fire hazard, public safety, and the MSHCP coincide with the integrity of the Foundation system.

Item 15.1, GPA 929 (Mead Valley)

Concur with staff recommendation to deny initiation. No changed circumstances justify more commercial, and use intensification should go through the Rural Village Overlay process in these locations.

Item 15.2, 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 step 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.

Denial of initiation is also consistent with the recommendations of the Riverside County Fire Hazard Reduction Task Force:

15.1 & 15.2 & 15.3

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

Item 15.3, GPA 1022 (Mead Valley)

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

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

With best regards,

Dan Silver, MD
Executive Director

Electronic cc: Board Offices
George Johnson
Ron Goldman
Damian Meins
Mike Harrod
Katherine Lind
Carolyn Luna
Charles Landry

FAX MEMO

June 21, 2010

TO: Clerk of the Board

Supervisor Bob Buster (ATTN: Dave Stahovich)

Supervisor John Tavaglione (ATTN: John Field)

Chairman Jeff Stone (ATTN: Olivia Barnes)

Supervisor John J. Benoit (ATTN: Mike Gialdini)

Chairman Marion Ashley (ATTN: Darcy Kuenzi)

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

RE: Agenda Item 15, June 22, 2010

PAGES: 3 (including cover)

2010-Oc-101311

FAX MEMO

July 9, 2010

TO: Clerk of the Board

Supervisor Bob Buster (ATTN: Dave Stahovich)

Supervisor John Tavaglione (ATTN: John Field)

Chairman Jeff Stone (ATTN: Olivia Barnes)

Supervisor John J. Benoit (ATTN: Mike Gialdini)

Chairman Marion Ashley (ATTN: Darcy Kuenzi)

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

RE: Agenda Item 15, July 13, 2010

PAGES: 3 (including cover)

7-13-10 15.1

2010-07-10788

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

July 9, 2010

VIA FASCIMILE AND ELECTRONIC MAIL

Chairman Marion Ashley
Riverside County Board of Supervisors
4080 Lemon Street, 5th Floor
Riverside, CA 92501

RE: Item 15, General Plan Amendment Initiation Proceedings (July 13, 2010)

Dear Chairman Ashley and Members of the Board:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPAs. We urge that the integrity of the Foundation system be upheld, and therefore that staff recommendations not be uniformly followed.

Item 15.1, GPA 985 (Elsinore)

Request additional information. Apparently, the proposal has been amended to limit conversion to Community Development to an 1.87-acre portion of a 34-acre site subject to flood hazard. We urge you to carefully evaluate any assurances that have been offered by the Flood Control District, including the effects of "flood proofing" on other properties. Also, no information has been provided as to whether MSHCP objectives would be prejudiced by the more limited proposal.

Item 15.2, GPA 970 (Eastvale)

Disagree with recommendation for initiation. Even with the staff-proposed modification, it is unclear why development should be allowed in a flood-prone area. We are also not convinced that MSHCP and recreational purposes would be advanced by development along the Santa Ana River.

Item 15.3, GPA 974 (French Valley)

Disagree with staff recommendation to initiate. For unspecified reasons, staff has *reversed* its prior sound recommendation for denial. The proposal would breach a Rural "Community Separator" for the City of Menifee and contribute to a larger group of unnecessary proposed urban conversions. *No absorption study based upon existing General Plan capacity justifies additional development.*

8424-A SANTA MONICA BLVD., #592, LOS ANGELES, CA 90069-4267 • WWW.EHLEAGUE.ORG • PHONE 213.804.2750 • FAX 323.654.1931

Item 15.4, GPA 976 (Winchester)

Disagree with staff recommendation to initiate. This 272-acre proposal is part of an intact Rural area that serves as a community separator. Urban conversion is being recommended *despite the complete absence of an absorption study showing that any additional urban land is actually needed.* Staff's recommendation indicates a substantial failure of the landowner-initiated GPA process to stabilize land uses and direct urban growth to municipalities and an orderly process of annexation. Rather, initiation of this proposal would show that piecemeal, applicant-driven GPAs continue to determine land use in the unincorporated area. Staff's proposal to require a specific plan for this and nearby GPAs does not cure the underlying planning failure. Specific plans are a prime historic engine of sprawl in the unincorporated area.

Item 15.5, GPA 1022 (Mead Valley)

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

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

With best regards,

Dan Silver, MD
Executive Director

Electronic cc: Board Offices
George Johnson
Ron Goldman
Damian Meins
Jerry Jolliffe
Mike Harrod
Katherine Lind
Carolyn Luna
Charles Landry

July 9, 2010

VIA FASCIMILE AND ELECTRONIC MAIL

Chairman Marion Ashley
Riverside County Board of Supervisors
4080 Lemon Street, 5th Floor
Riverside, CA 92501

RE: Item 15, General Plan Amendment Initiation Proceedings (July 13, 2010)

Dear Chairman Ashley and Members of the Board:

The Endangered Habitats League (EHL) appreciates the opportunity to comment on these landowner-initiated GPAs. We urge that the integrity of the Foundation system be upheld, and therefore that staff recommendations not be uniformly followed.

Item 15.1, GPA 985 (Elsinore)

Request additional information. Apparently, the proposal has been amended to limit conversion to Community Development to an 1.87-acre portion of a 34-acre site subject to flood hazard. We urge you to carefully evaluate any assurances that have been offered by the Flood Control District, including the effects of "flood proofing" on other properties. Also, no information has been provided as to whether MSHCP objectives would be prejudiced by the more limited proposal.

Item 15.2, GPA 970 (Eastvale)

Disagree with recommendation for initiation. Even with the staff-proposed modification, it is unclear why development should be allowed in a flood-prone area. We are also not convinced that MSHCP and recreational purposes would be advanced by development along the Santa Ana River.

Item 15.3, GPA 974 (French Valley)

Disagree with staff recommendation to initiate. For unspecified reasons, staff has *reversed* its prior sound recommendation for denial. The proposal would breach a Rural "Community Separator" for the City of Menifee and contribute to a larger group of unnecessary proposed urban conversions. *No absorption study based upon existing General Plan capacity justifies additional development.*

Item 15.4, GPA 976 (Winchester)

Disagree with staff recommendation to initiate. This 272-acre proposal is part of an intact Rural area that serves as a community separator. Urban conversion is being recommended *despite the complete absence of an absorption study showing that any additional urban land is actually needed.* Staff's recommendation indicates a substantial failure of the landowner-initiated GPA process to stabilize land uses and direct urban growth to municipalities and an orderly process of annexation. Rather, initiation of this proposal would show that piecemeal, applicant-driven GPAs continue to determine land use in the unincorporated area. Staff's proposal to require a specific plan for this and nearby GPAs does not cure the underlying planning failure. Specific plans are a prime historic engine of sprawl in the unincorporated area.

Item 15.5, GPA 1022 (Mead Valley)

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

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

With best regards,

Dan Silver, MD
Executive Director

Electronic cc: Board Offices
George Johnson
Ron Goldman
Damian Meins
Jerry Jolliffe
Mike Harrod
Katherine Lind
Carolyn Luna
Charles Landry

Item 15.1
7/13/10

Harrod, Mike

From: Anna Hoover [ahoover@pechanga-nsn.gov]
Sent: Monday, July 12, 2010 10:31 AM
To: Mouriquand, Leslie; Harrod, Mike; Harrison, Tamara
Subject: GPA 985

Leslie,
In reviewing the BOS agenda for tomorrow, GPA 985 is up for approval (GPIP Process). Please note that this proposed GPA contains a large archaeological/cultural site which will be impacted by the proposed GP Foundation Component change from Open Space to Med High Residential. The Tribe has serious concerns about this area. We want to work closely with you, the Project Planner, Developer and Project Archaeologist during the CEQA process in order to preserve and protect this site and any others identified within the project boundaries.

Thank you!

Anna M. Hoover
Cultural Analyst
Pechanga Band of Luiseno Mission Indians
P.O. Box 2183
Temecula, CA 92593

951-770-8100 (O)
951-694-0446 (F)
951-757-6139 (C)
ahoover@pechanga-nsn.gov

*Please note our new Office Number