

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



ITEM
16.1
(ID # 3713)

MEETING DATE:

Tuesday, March 14, 2017

FROM : TLMA-PLANNING:

SUBJECT: TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: GENERAL PLAN INITIATION PROCEEDINGS FOR GENERAL PLAN AMENDMENT NO. 1196 (Foundation and Entitlement/Policy) – APPLICANT: Jeff Chung – ENGINEER/REPRESENTATIVE: Albert A Webb Associates – First Supervisorial District – Lake Mathews/Woodcrest Area Plan – Mead Valley Zoning District – ZONE: Light Agriculture (A-1-1) and Residential Agriculture (R-A-1) – LOCATION: South of Markham Street, east of Wood Road, west of Luck Lane, and north of Cajalco Road – PROJECT SIZE: 238.5 gross acres – REQUEST: Adopt an order initiating the proceedings for General Plan Amendment No. 1196, that proposes to amend a portion of the project site's General Plan Foundation from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Medium Density Residential (MDR), on 14 parcels, totaling 238.5 gross acres. Applicant Fees 100%. [\$0]

RECOMMENDED MOTION: Staff recommends that the Board of Supervisors:

1. **Adopt** an order initiating proceedings for **General Plan Amendment No. 1196**, based on information provided by the applicant and comments received from the Planning Commission and General Plan Advisory Committee.

ACTION: Policy

Juan C. Pires, Director of Transportation & Land Management

3/2/2017

MINUTES OF THE BOARD OF SUPERVISORS

(ACCEPTED WITHDRAWAL)

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

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A
NET COUNTY COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A
SOURCE OF FUNDS: Applicant Fees 100%			Budget Adjustment:	No
			For Fiscal Year:	N/A

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Project Scope

General Plan Amendment No. 1196 is a General Plan Foundation Component Amendment to change a portion of the project site's Foundation Component from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Medium Density Residential (MDR), on 14 parcels, totaling 238.5 gross acres. The project site is generally located south of Markham Street, east of Wood Road, west of Luck Lane, north of Cajalco Road, and is within the Lake Mathews/Woodcrest Area Plan. The application for this Foundation Component General Plan Amendment was submitted during the application window for the 2016 General Plan Review Cycle.

General Plan Initiation Process

Prior to a private application for a General Plan Regular Foundation Component Amendment being processed by the Planning Department, the application is required to go through the General Plan Initiation Process (GPIP) process. The GPIP process includes receiving comments on the proposed amendment from the General Plan Advisory Committee (GPAC) and the Planning Commission. These comments are then provided to the Board of Supervisors. At this initial stage of the process, specific details of the Foundation General Plan Amendment and any accompanying implementing project are not considered, and public hearings are not required before the Planning Commission or the Board of Supervisors. The GPIP process provides an opportunity for the applicant to hear comments related to his or her proposed project before embarking on the land use and environmental review process. At this time, the Board of Supervisors will only be considering whether to initiate proceedings for the proposed Foundation Component General Plan Amendment. If the Board of Supervisors adopts an order initiating proceedings for the proposed Amendment, the proposed Amendment will then go through the land use review process including applicable environmental review, Tribal consultation, and public hearings. The initiation of proceedings by the Board of Supervisors does not commit the County to a certain course of action and shall not imply any such amendment will be approved. The Board retains full discretion under the California Environmental Quality Act when reviewing the proposed Amendment during the land use review process.

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

Justification for Foundation Component Amendment

Pursuant to the Riverside County General Plan, Chapter 11: Administration Element and Article II, Section 2.5 of Ordinance No. 348, related to General Plan Regular Foundation Component Amendments, specific findings are required to approve a Foundation Component Amendment. These include findings that new conditions or circumstances exist that justify modifying the General Plan, that the modification does not conflict with the overall County Vision and that the modification would not create an internal inconsistency among the other General Plan Elements. The application for Foundation Component Amendments requires the applicant to provide information describing a new condition or circumstance that justifies modifying the General Plan. Such information has been provided by the applicant and is included with this report package.

General Plan Advisory Committee

This application was considered by the General Plan Advisory Committee (GPAC) during a public meeting on August 18, 2016, Agenda Item 3.10, and was recommended for initiation to the Planning Commission by a majority.

During the GPAC meeting, staff explained that the project site had been considered for a Foundation Component change during the 2008 cycle. Three separate applications had been filed, covering the same area as this project, GPA01196. However, during the previous cycle, none of these applications were taken completely through the approval process and as a result, they were each abandoned. The GPAC members reviewed the proposal and felt the Foundation level change was appropriate, as the new high school towards the northwest of the project site, changed the circumstances for the area.

Planning Commission

This application was considered by the Planning Commission during a public meeting on October 19, 2016, Agenda Item 2.10, and the following comments were provided by the Planning Commissioners:

During the Planning Commission meeting, staff again initially described the history of the site as it relates to the 2008 Foundation cycle. During the presentation, several community members spoke against the proposed project. Of primary concern from the community was the proposed introduction of smaller lots into an area that has primarily 1-acre minimum lot sizes. Further concerns expressed by the community had to do with existing conditions related to traffic around the high school spilling into the community. The applicant spoke on behalf of the project and proposed a modified land use plan, whereby a transition of lot sizes starting from the existing 1 acre minimum would first taper down to ½ acre lot minimums and then further down to a medium density residential (2-5 du/ac) range, immediately adjacent to the school. The community still felt that the area should remain as 1 acre lot minimums, but were somewhat split with regards to lot sizes adjacent to the school. The Planning Commission discussed the lot size issue and concluded that as a result of the high school, circumstances changed. The Commission felt the proposed

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

Foundation change could work, but highly cautioned the applicant to continue working with the community to come up with a mutually agreeable plan.

Impact on Citizens and Businesses

None at this time. Should the Board of Supervisors initiate this General Plan Foundation Component Amendment application, an appropriate level of land use review and environmental analysis will be conducted in conjunction with the amendment and with any implementing project.

SUPPLEMENTAL:

Additional Fiscal Information

All fees are paid by the applicant. There is no general fund obligation.

Contract History and Price Reasonableness

N/A

ATTACHMENTS:

Attachment A – Exhibits

Attachment B – BOS Report Package

Attachment C – PC Report Package

Attachment D – GPAC Report Package


Tina Grande, Principal Management Analyst 3/8/2017

✓ *COB MISC

Maxwell, Sue

From: Maxwell, Sue
Sent: Wednesday, May 03, 2017 8:49 AM
To: Perez, Juan; Leach, Charissa; Grande, Tina; Young, Alisa; COB-Agenda (COB-Agenda@rivco.org); District2; District3; District4 Supervisor John J Benoit; District5; Supervisor Jeffries - 1st District
Subject: Public Comment in Opposed to GPAt No 1196 - May 23, 2017 (Tabled Item from March 14, 2017 / MT 3713)

Good morning,

Below is an email received via COB in opposition to GPA 1196, scheduled to be presented to the Board of Supervisors on May 23, 2017 and being forwarded to you for review.

Thank you kindly,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>

From: Maxwell, Sue
Sent: Wednesday, May 03, 2017 8:20 AM
To: 'Rosebell Carter' <rosebellcarter3@gmail.com>
Subject: RE: Opposed to Amendment Riverside General Plan no.1196

Good morning Rosebell,

The Riverside County Clerk of the Board of Supervisors received your correspondence in opposition to General Plan Amendment No 1196 in the Mead Valley area, and is forwarding it to the appropriate areas for review.

GPA 1196 is scheduled to go before the Board of Supervisors on Tuesday, May 23, 2017.

Below is a link to the Clerk of the Board's website for which you can find the Board of Supervisors' Meeting Agendas*, as well as Proceedings/Minute Orders from previous meetings.

<http://www.rivcocob.org/2017-agendas/>

*Agendas are posted on-line Thursday prior to the Tuesday meeting.

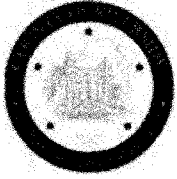
Please feel free to contact me if additional information is needed, and have a nice day.

With warm regard,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org

3713
3/14/17 16.4
2017-5-135589



NOTICE: This communication is intended for the use of the individual or entity to which it is addressed and may contain **information that is privileged, confidential and exempt from disclosure** under applicable law. If the reader of this communication is not the intended recipient or the employee or agent responsible for delivering this communication to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by reply email or by telephone and immediately delete this communication and all its attachments.

From: Rosebell Carter [<mailto:rosebellcarter3@gmail.com>]
Sent: Tuesday, May 02, 2017 4:15 PM
To: COB <COB@RIVCO.ORG>
Subject: Opposal to Amendment Riverside General Plan no.1196

Rosebell Carter
15181 Van Buren Blvd. spc 108
Riverside, ca 92504
(951)201-0372

May 2, 2017

Dear Board of Supervisors,

This proposal is not appropriate for this area for a number of reasons. The infrastructure is not there to support the additional density. The existing roads are not suitable to move additional traffic. The county does not have the funds to improve the road system, or repair the existing roads as it is, and the developer widening the roads immediately adjacent to their project property is not the answer, if it even happens. The additional vehicles are going to travel far further than the length of the property. The safety of the residents and especially the children along Wood Road and Markham will be placed at great risk, with the additional vehicle load, and speed increases that typically accompany this. In a time where the county is reducing the level of law enforcement for funding reasons, it is irresponsible for the county to consider the additional density and demand for the necessary services. The infrastructure should precede more high density development. Available resources are already stretched: critical water, electrical, and yes, law enforcement and more. Restrictions and reductions of services for existing residents should not be, so that developers can build unrestricted, adding to the demand for those resources already in short supply. The developers purchase property, knowing what the zoning is; Therefore, they should be held to building to that zoning. The county has a General Plan - how can the county plan when all that a developer has to do is fill out an application and write a check to the county to change zoning? The history of the area needs to be considered instead of means and ways to accept bribes. Most of the existing residents have worked long and hard to work out a zoning plan that is reasonable for the area. The Board of Supervisors has a duty to

all of their residents, including those wishing a more rural atmosphere. Unfortunately, many of us have experienced in the past, situations that have proven over and over that lot sizes such as this are not compatible with those surrounding the proposed development. The smaller lots attract a completely different type of lifestyle, making it difficult or impossible for existing residents to continue to enjoy their chosen way of life that they worked hard for. The Board of Supervisors has a duty to make sure that new development is compatible. This rezoning does not meet that duty. This zone change does not or will not benefit current residents or future residents. I totally oppose this Amendment General Plan No.1196. Thank you for reading my letter.

Sincerely Yours,

R. Carter

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



16-4

10:30 a.m. being the time set for the recommendation from Transportation & Land Management Agency/Planning regarding General Plan Initiation Proceedings for General Plan Amendment No. 1196 (Foundation and Entitlement/Policy) – APPLICANT: Jeff Chung – ENGINEER/REPRESENTATIVE: Albert A Webb Associates – First Supervisorial District – Lake Mathews/Woodcrest Area Plan – Mead Valley Zoning District – ZONE: Light Agriculture (A-1-1) and Residential Agriculture (R-A-1) – LOCATION: South of Markham Street, east of Wood Road, west of Luck Lane, and north of Cajalco Road – PROJECT SIZE: 238.5 gross acres – REQUEST: Adopt an order initiating the proceedings for General Plan Amendment No. 1196, that proposes to amend a portion of the project site's General Plan Foundation from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Medium Density Residential (MDR), on 14 parcels, totaling 238.5 gross acres.

The following people spoke on the matter:

John Hildebrand, Planning staff	
Darin Little	Ken Barnes
John Minnella	Nancy Varela
Debbie Walsh	Stephen Francis
Lee Cussins	Ted Weggeland
Laurie Sabo	

On motion of Supervisor Jeffries, seconded by Supervisor Ashley and duly carried by unanimous vote, IT WAS ORDERED that the above matter is continued to Tuesday, May 23, 2017 at 10:30 a.m. or as soon as possible thereafter.

Roll Call:

Ayes:	Jeffries, Tavaglione, Washington and Ashley
Nays:	None
Absent:	None

I hereby certify that the foregoing is a full true, and correct copy of an order made and entered on March 14, 2017 of Supervisors Minutes.

WITNESS my hand and the seal of the Board of Supervisors
Dated: March 14, 2017
Kecia Harper-Ihem, Clerk of the Board of Supervisors, in
and for the County of Riverside, State of California.

(seal)

By:  Deputy

AGENDA NO.

~~16-4~~

xc: Planning, Applicant, COB

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



ITEM
16.4
(ID # 3713)

MEETING DATE:

Tuesday, March 14, 2017

FROM : TLMA-PLANNING:

SUBJECT: TRANSPORTATION & LAND MANAGEMENT AGENCY/PLANNING: GENERAL PLAN INITIATION PROCEEDINGS FOR GENERAL PLAN AMENDMENT NO. 1196 (Foundation and Entitlement/Policy) – APPLICANT: Jeff Chung – ENGINEER/REPRESENTATIVE: Albert A Webb Associates – First Supervisorial District – Lake Mathews/Woodcrest Area Plan – Mead Valley Zoning District – ZONE: Light Agriculture (A-1-1) and Residential Agriculture (R-A-1) – LOCATION: South of Markham Street, east of Wood Road, west of Luck Lane, and north of Cajalco Road – PROJECT SIZE: 238.5 gross acres – REQUEST: Adopt an order initiating the proceedings for General Plan Amendment No. 1196, that proposes to amend a portion of the project site's General Plan Foundation from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Medium Density Residential (MDR), on 14 parcels, totaling 238.5 gross acres. Applicant Fees 100%.

RECOMMENDED MOTION: Staff recommends that the Board of Supervisors:

1. **Adopt** an order initiating proceedings for **General Plan Amendment No. 1196**, based on information provided by the applicant and comments received from the Planning Commission and General Plan Advisory Committee.

ACTION: (Policy)

Juan C. Perez, Director of Transportation & Land Management

3/2/2017

MINUTES OF THE BOARD OF SUPERVISORS

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

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
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NET COUNTY COST	\$ N/A	\$ N/A	\$ N/A	\$ N/A
SOURCE OF FUNDS: Applicant Fees 100%			Budget Adjustment:	No
			For Fiscal Year:	N/A

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Project Scope

General Plan Amendment No. 1196 is a General Plan Foundation Component Amendment to change a portion of the project site's Foundation Component from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Medium Density Residential (MDR), on 14 parcels, totaling 238.5 gross acres. The project site is generally located south of Markham Street, east of Wood Road, west of Luck Lane, north of Cajalco Road, and is within the Lake Mathews/Woodcrest Area Plan. The application for this Foundation Component General Plan Amendment was submitted during the application window for the 2016 General Plan Review Cycle.

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

Justification for Foundation Component Amendment

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

Foundation change could work, but highly cautioned the applicant to continue working with the community to come up with a mutually agreeable plan.

Impact on Citizens and Businesses

None at this time. Should the Board of Supervisors initiate this General Plan Foundation Component Amendment application, an appropriate level of land use review and environmental analysis will be conducted in conjunction with the amendment and with any implementing project.

SUPPLEMENTAL:

Additional Fiscal Information

All fees are paid by the applicant. There is no general fund obligation.

Contract History and Price Reasonableness

N/A

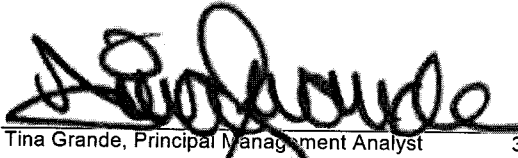
ATTACHMENTS:

Attachment A – Exhibits

Attachment B – BOS Report Package

Attachment C – PC Report Package

Attachment D – GPAC Report Package



Tina Grande, Principal Management Analyst

3/8/2017

ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE



March 13, 2017

VIA ELECTRONIC MAIL

The Hon. John Tavaglione, Chair
Riverside County Board of Supervisors
4080 Lemon St.
Riverside CA 92501

RE: Items 16.1-16.6, General Plan Initiation Proceedings, March 14, 2017

Dear Chairman Tavaglione and Members of the Board:

Endangered Habitats League (EHL) appreciates the opportunity to submit written testimony on the General Plan Initiation Proceedings. We were honored to serve on the General Plan Advisory Committee (GPAC) which reviewed these proposals. Proposals that do not have compelling planning merit and that do not reflect significant changes in circumstances should not move forward to full environmental review.

General comments

Prior to your consideration of initiating environmental review, EHL urges the Planning Department to provide: 1) the basic information necessary to determine whether the more intensive proposed uses are justified, and 2) guidelines to assess whether the proposals – individually or collectively – move the County in the right planning direction.

Basic and necessary information includes the *housing capacity* present but unbuilt in the County and Cities' General Plans. Prior information indicates that there is a huge *overcapacity* of housing that argues against all but the most strategic increases. Other missing information includes the cumulative traffic implications of the proposed General Plan amendments. We urge you to request such information.

Factors in assessing proposals should include whether the jobs-housing balance is improved or worsened, whether the greater intensity of use will be served by transit now or realistically in the future, whether vehicles miles traveled would be below current averages and put greenhouse gas (GHG) emissions on a lowered trajectory, proximity of infrastructure and services, whether the new development will be subject to high fire hazard, and whether it conflicts with the MSHCP or otherwise impacts intact natural lands. We hope that the Planning Department will offer its professional guidance. If not, your Board should independently formulate *guiding principles* for GPA initiation. A piecemeal approach is not adequate.

16.4 3/14/17
2017-3-134620

EHL's recommendations are based upon presence of a planning rationale, jobs-housing balance, transit availability, vehicle miles traveled and GHG emissions, the folly of putting more and more homes in the path of wildfire, and biological considerations. In some cases, we have identified missing information or suggested modifications. We hope that your Board will take a hard look at the County's future and chart a more sustainable path for the County's present and future citizens than simply perpetuating current trends.

Also, the staff reports for these items are brief and inappropriately defer to the applicants for the requisite findings, rather than providing independent staff analysis.

Specific comments

16.1 GENERAL PLAN AMENDMENT NO. 1189 – Lake Mathews/Woodcrest Area, 36 gross acres – REQUEST: Proposal to amend the project site's General Plan Foundation Component from Open Space (OS) to Community Development (CD) and amend its Land Use Designation from Conservation Habitat (CH) to Commercial Retail (CR) and Low Density Residential (LDR), on two parcels

Oppose initiation unless modified

According to the applicant, the Open Space Conservation Habitat was applied in error and the property is not part of the MSHCP preserve. If correct, this justifies the initiation of a GPA. However, the proposal for Community Development and a mix of low density residential and commercial retail is excessive and out of character with surrounding Rural. Instead, a Technical Amendment can be processed that simply corrects the current designation.

16.2 GENERAL PLAN AMENDMENT NO. 1192 — Lake Mathews/Woodcrest Area, 10.3 gross acres – REQUEST: Proposal to amend the project site's General Plan Foundation Component from Rural Community (RC) to Community Development (CD) and amend its Land Use Designation from Very Low Density Residential (VLDR) to Commercial Retail (CR), on three parcels

More information needed

The Planning Department should provide an objective determination of whether additional commercial retail capacity beyond that already in the General Plan is needed in this location.

16.3 GENERAL PLAN AMENDMENT NO. 1193 – Elsinore Area Plan, 7.12 gross acres – REQUEST: Proposal to amend the project site's General Plan Foundation Component from Open Space (OS) to Rural (R) and amend its Land Use Designation from Rural (RUR) to Rural Residential (RR), on one parcel

Oppose initiation

This is a meritless proposal to change properly designated Open Space-Rural to Rural residential, *increasing the density by a factor of four*. Open Space Rural was correctly applied due to constraints such as severe fire hazard. *Please don't put more and more life and property at risk of wildfire.*

16.4 GENERAL PLAN AMENDMENT NO. 1196 – Lake Mathews/Woodcrest Area, 238.5 gross acres – REQUEST: Proposal to amend the project site's General Plan Foundation Component from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Low Density Residential (LDR) and Medium Density Residential (MDR), on 14 parcels

More information needed

This is a proposal to replace a dysfunction Rural Community designation with Community Development within Mead Valley. It could be considered "infill" of sorts that uses urbanized land more efficiently. However, a strong planning rationale has not been made in terms of this being a priority location for additional housing capacity, ameliorating jobs-housing imbalance, having access to current or future transit, and/or reducing average per capita vehicle miles traveled and GHG emissions. If this case can be made, then we would support initiation.

16.5 GENERAL PLAN AMENDMENT NO. 1198 – Mead Valley Area, 3 gross acres – REQUEST: Proposal to amend the project site's General Plan Foundation Component from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Medium Density Residential (MDR), on one parcel

More information needed

This is a proposal to replace a dysfunction Rural Community designation with Community Development within Mead Valley. It could be considered "infill" of sorts that uses urbanized land more efficiently. However, a strong planning rationale has not been made in terms of this being a priority location for additional housing capacity, ameliorating jobs-housing imbalance, having access to current or future transit, and/or reducing average per capita vehicle miles traveled and GHG emissions. If this case can be made, then we would support initiation.

16.6 GENERAL PLAN AMENDMENT NO. 1200 – Lake Mathews/Woodcrest Area, 1.91 gross acres – REQUEST: Proposal to amend the project site's General Plan Foundation Component from Rural Community (RC) to Community Development (CD) and to amend its Land Use Designation from Very Low Density Residential (VLDR) to Light Industrial (LI), on one parcel.

Support initiation

This is a proposal to conform the existing land use, which appears compatible with the surrounding area.

Thank you for considering our views.

Yours truly,

A handwritten signature in black ink, appearing to read "Dan Silver", written in a cursive style.

Dan Silver
Executive Director

Maxwell, Sue

From: Dan Silver <dsilverla@me.com>
Sent: Monday, March 13, 2017 10:18 AM
To: Tavaglione, John; Jeffries, Kevin; Ashley, Marion; district3@rcbos.org; Benoit, John; COB
Cc: Johnson, George; Perez, Juan; Weiss, Steven; Scott Hildebrandt; Bowie, Desiree; Clack, Shellie; Balderrama, Olivia; Field, John; Magee, Robert; Pradetto, Joe; Balderrama, Olivia
Subject: Items 16.1-16.6, General Plan Initiation Proceedings, March 14 2017
Attachments: EHL-BoS-Items16.1-16.6-GIPs-3.14.17.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

VIA ELECTRONIC MAIL

March 13, 2017

The Hon John Tavaglione, Chair
Riverside County Board of Supervisors
4080 Lemon St
Riverside CA 92501

RE: Items 16.1-16.6, General Plan Initiation Proceedings, March 14 2017

Dear Chairman Tavaglione and Members of the Board:

Endangered Habitats League appreciates the opportunity to submit the enclosed written testimony.

Thank you for your consideration

Sincerely,
Dan Silver

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
www.ehleague.org



OFFICE OF
CLERK OF THE BOARD OF SUPERVISORS
1st FLOOR, COUNTY ADMINISTRATIVE CENTER
P.O. BOX 1147, 4080 LEMON STREET
RIVERSIDE, CA 92502-1147
PHONE: (951) 955-1060
FAX: (951) 955-1071

KECIA HARPER-IHEM
Clerk of the Board of Supervisors

KIMBERLY A. RECTOR
Assistant Clerk of the Board

March 7, 2017

THE PRESS ENTERPRISE
ATTN: LEGALS
P.O. BOX 792
RIVERSIDE, CA 92501

E-MAIL: legals@pe.com
FAX: (951) 368-9018

RE: NOTICE OF PUBLIC MEETING: GPA 1196

To Whom It May Concern:

Attached is a copy for publication in your newspaper for **One (1) time on Friday, March 10, 2017.**

We require your affidavit of publication immediately upon completion of the last publication.

Your invoice must be submitted to this office, **WITH TWO CLIPPINGS OF THE PUBLICATION.**

NOTE: PLEASE COMPOSE THIS PUBLICATION INTO A SINGLE COLUMN FORMAT.

Thank you in advance for your assistance and expertise.

Sincerely,

Cecilia Gil

Board Assistant to:
KECIA HARPER-IHEM, CLERK OF THE BOARD

Gil, Cecilia

From: Legals <legals@pe.com>
Sent: Tuesday, March 7, 2017 8:59 AM
To: Gil, Cecilia
Subject: Re: FOR PUBLICATION: GPA 1196

Received for publication on 3/10. Proof with cost to follow.

Nick Eller

Legal Advertising Phone: **951-368-9222** / Fax: **951-368-9018** / E-mail: legals@pe.com
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On Tue, Mar 7, 2017 at 8:44 AM, Gil, Cecilia <CCGIL@rivco.org> wrote:

Good morning! Attached is a Notice of Public Meeting, for publication on Friday, March 10, 2017. Please confirm. THANK YOU!

Cecilia Gil

Board Assistant

Clerk of the Board of Supervisors

4080 Lemon St., 1st Floor, Room 127

Riverside, CA 92501

(951) 955-8464 Fax (951) 955-1071

Mail Stop# 1010

ccgil@rivco.org

<http://rivcocob.org/>

CERTIFICATE OF POSTING

(Original copy, duly executed, must be attached to
the original document at the time of filing)

I, Cecilia Gil, Board Assistant to Kecia Harper-Ihem, Clerk of the Board of Supervisors, for the County of Riverside, do hereby certify that I am not a party to the within action or proceeding; that on March 7, 2017, I forwarded to Riverside County Clerk & Recorder's Office a copy of the following document:

NOTICE OF PUBLIC MEETING

GPA 1196

to be posted in the office of the County Clerk at 2724 Gateway Drive, Riverside, California 92507. Upon completion of posting, the County Clerk will provide confirmation of posting.

Board Agenda Date: March 14, 2017 @ 10:30 A.M.

SIGNATURE: Cecilia Gil DATE: March 7, 2017
Cecilia Gil

Gil, Cecilia

From: Kennemer, Bonnie <bkeneme@asrclkrec.com>
Sent: Tuesday, March 7, 2017 8:50 AM
To: Gil, Cecilia; Buie, Tammie; Garrett, Nancy; Meyer, Mary Ann
Subject: RE: FOR POSTING: GPA 1196

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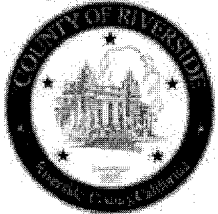
Thank you,
Bonnie

From: Gil, Cecilia [mailto:CCGIL@RIVCO.ORG]
Sent: Tuesday, March 07, 2017 8:45 AM
To: Buie, Tammie <tbuie@asrclkrec.com>; Garrett, Nancy <ngarrett@asrclkrec.com>; Kennemer, Bonnie <bkeneme@asrclkrec.com>; Meyer, Mary Ann <MaMeyer@asrclkrec.com>
Subject: FOR POSTING: GPA 1196

Good morning! Notice of Public Meeting is attached for POSTING. Please confirm. THANK YOU!

Cecilia Gil

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon St., 1st Floor, Room 127
Riverside, CA 92501
(951) 955-8464 Fax (951) 955-1071
Mail Stop# 1010
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NOTICE OF PUBLIC MEETING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN INITIATION PROCEEDINGS FOR A GENERAL PLAN AMENDMENT IN THE ELSINORE / CLEVELAND AREA PLAN, FIRST SUPERVISORIAL DISTRICT

NOTICE IS HEREBY GIVEN that a public meeting will be held before the Board of Supervisors of Riverside County, California, on the 1st Floor Board Chambers, County Administrative Center, 4080 Lemon Street, Riverside, on **Tuesday, March 14, 2017 at 10:30 A.M.** or as soon as possible thereafter, to consider initiation proceedings for the application submitted by Jeff Chung – Albert A. Webb Associates, on **General Plan Amendment No. 1196**, which proposes to amend the General Plan Foundation Component from Rural Community (RC) to Community Development (CD) and amend the land use from Very Low Density Residential (VLDR) (1 acre minimum) to Medium Density Residential (MDR) (2-5 du/ac), on 14 parcels, totaling 238.5 gross acres (“the project”). The project is located south of Markham Street, east of Wood Road, west of Luck Lane, and north of Cajalco Road in the Lake Mathews / Woodcrest Area – Mead Valley Zoning, First Supervisorial District.

The Planning Commission recommended that the Board of Supervisors adopt an order initiating proceedings for **General Plan Amendment No. 1196**.

The project case file may be viewed from the date of this notice until the public hearing, Monday through Friday, from 8:00 a.m. to 5:00 p.m. at the Clerk of the Board of Supervisors at 4080 Lemon Street, 1st Floor, Riverside, California 92501, and at the Riverside County Planning Department at 4080 Lemon Street, 12th Floor, Riverside, California 92501.

FOR FURTHER INFORMATION REGARDING THIS PROJECT, PLEASE CONTACT JOHN HILDEBRAND, PROJECT PLANNER, AT (951) 955-1888 OR EMAIL jhildebr@rctlma.org.

Any person wishing to testify in support of or in opposition to the project may do so in writing between the date of this notice and the public meeting, or may appear and be heard at the time and place noted above. All written comments received prior to the public meeting will be submitted to the Board of Supervisors and the Board of Supervisors will consider such comments, in addition to any oral testimony, before making a decision on the project.

If you challenge the above item in court, you may be limited to raising only those issues you or someone else raised at the public meeting described in this notice, or in written correspondence to the Planning Commission or Board of Supervisors at, or prior to, the public meeting. Be advised that as a result of the public meeting and the consideration of all public comment, written and oral, the Board of Supervisors may amend, in whole or in part, the project and/or the related environmental document. Accordingly, the designations, development standards, design or improvements, or any properties or lands within the boundaries of the project, may be changed in a way other than specifically proposed.

Please send all written correspondence to: Clerk of the Board, 4080 Lemon Street, 1st Floor, Post Office Box 1147, Riverside, CA 92502-1147

Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Lisa Wagner at (951) 955-1063 or email at LWagner@rivco.org, 72 hours prior to the meeting.

Dated: March 7, 2017

Kecia Harper-Ihem, Clerk of the Board
By: Cecilia Gil, Board Assistant



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Ad Desc.: GPA 1196 /

I am a citizen of the United States. I am over the age of eighteen years and not a party to or interested in the above entitled matter. I am an authorized representative of THE PRESS-ENTERPRISE, a newspaper in general circulation, printed and published daily in the County of Riverside, and which newspaper has been adjudicated a newspaper of general circulation by the Superior Court of the County of Riverside, State of California, under date of April 25, 1952, Case Number 54446, under date of March 29, 1957, Case Number 65673, under date of August 25, 1995, Case Number 267864, and under date of September 16, 2013, Case Number RIC 1309013; that the notice, of which the annexed is a printed copy, has been published in said newspaper in accordance with the instructions of the person(s) requesting publication, and not in any supplement thereof on the following dates, to wit:

03/10/2017

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Date: March 10, 2017
At: Riverside, California



Legal Advertising Representative, The Press-Enterprise

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NOTICE OF PUBLIC MEETING BEFORE THE BOARD OF SUPERVISORS OF RIVERSIDE COUNTY ON A GENERAL PLAN INITIATION PROCEEDINGS FOR A GENERAL PLAN AMENDMENT IN THE ELSINORE / CLEVELAND AREA PLAN, FIRST SUPERVISORIAL DISTRICT

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Alternative formats available upon request to individuals with disabilities. If you require reasonable accommodation, please contact Lisa Wagner at (951) 955-1063 or email at LWagner@rivco.org, 72 hours prior to the meeting.

Dated: March 7, 2017
Kecia Harper-Ihem, Clerk of the Board
By: Cecilia Gil, Board Assistant

3/10

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May 23, 2017 BOS Meeting

Public Comments

Agenda Item 16.1: GPA01196

Johnson, Smith & Foy

A T T O R N E Y S a t L A W
P.O. Box 1029, Temecula, CA 92593

Abigail A. Smith, Esq.
Kimberly Foy, Esq.

Abby@SoCalCEQA.com
Kim@SoCalCEQA.com
Telephone: (951) 506-9925
Fax: (951) 506-9975

May 22, 2017

VIA Email Only

Board of Supervisors
c/o Kecia Harper-Ihem
Clerk of the Board
County of Riverside
4080 Lemon Street, 1st Floor
Riverside, CA 92501
cob@rivco.org
cob@rcbos.org

John Hildebrand III
P.O. Box 1409
Riverside, CA 92502-1409
jhildebr@rctlma.org

**RE: ITEM 16.1- OPPOSITION TO INITIATION OF GENERAL PLAN AMENDMENT
NO. 1196- PROPOSED FOUNDATION CHANGE FROM RURAL COMMUNITY (RC)
TO COMMUNITY DEVELOPMENT (CD)**

Greetings:

On behalf of concerned area residents and No2Rezoning.org, please consider these comments in opposition to the proposed initiation of General Plan Amendment (“GPA”) No. 1196. GPA 1196 proposes to amend the General Plan Foundation Component a 238.5 gross acre site in the Cajalco Wood policy area from Rural Community (RC) to Community Development and to amend the site’s land use designation from Very Low Density Residential (VLDR) to Low Density Residential (LDR) and Medium Density Residential (MDR).

The County must decline to initiate GPA 1196. Foremost, GPA 1196 can no longer be initiated under the Regular Foundation Component Amendment provisions of the Riverside County Zoning Ordinance as the eight- year cycle for such amendment has closed. While a project need not be approved during the eight-year cycle, the vote to initiate the amendment must be made during that calendar year- here 2016. (Ord. 348.4840 Section 2.5 B, C, F.) It was not.

No evidence supports an Extraordinary Foundation Component Amendment for this proposed project. The burden is on the applicant to affirmatively establish such substantial evidence exists as necessary to support the required facts and findings. The proposal before you lacks compelling merit and fails to show any significant changes in circumstances or other extraordinary circumstances justify review.

Furthermore, the County should decline to initiate GPA 1196 as the proposed land use density is not in keeping with the surrounding rural, agricultural community. Various adverse impacts would also result from the proposed piecemeal urbanization, including traffic impacts from limited vehicle capacity on surrounding roadways; noise and safety impacts from increased vehicle trip generation and conflicting land uses; impacts to biological resources from increased site usage including in sensitive areas; etc. For each of these reasons, and as detailed herein, we strongly implore the Board to decline to initiate GPA 1196.

I. FINDINGS FOR AN EXTRAORDINARY FOUNDATION COMPONENT GENERAL PLAN AMENDMENT CANNOT BE MADE

To ensure constancy in the General Plan, the Zoning Ordinance (Ord. No. 348.4840) Section 2.5 provides that no Foundation Component Amendment shall be heard or approved except as initiated during an Eight- Year General Plan Review Cycle. The Board can adopt an order initiating amendment proceedings at any time during the calendar year of the eight- year cycle, but cannot thereafter initiate proceedings. For an amendment initiated during the eight-year cycle can be processed, heard, and decided anytime.

The close of 2016 saw the close of any opportunity to initiate Regular Foundation Component Amendments. The time to initiation this proposed Foundation Component Amendment under the Regular amendment proceedings, and with regular findings, has thus expired.

To prevent a regulatory taking and address limited other extraordinary circumstances, however, the Zoning Ordinance does provide the rare opportunity for a few specifically delineated Extraordinary Foundation Component Amendments. Specifically, to approve an Extraordinary Foundation Component Amendment, the County must first find *both* of the following:

1. The foundation change is based on substantial evidence that new conditions or circumstances disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan. The foregoing requirement for findings shall not apply to any amendment to the Riverside County Vision.
2. A condition exists or an event has occurred that is unusually compelling and can only be rectified by making changes in the current Riverside County Vision, General Planning Principles set forth in General Plan Appendix B, or Foundation Component.

In addition to finding substantial evidence supports these two mandatory findings, the County must also, second find at least one of the following exceptional circumstances exists:

3. An unconstitutional taking of property might occur without the amendment, and the amendment alters the General Plan Foundation Component only to the extent necessary to avoid the potential taking.

4. A natural or man-made disaster or public emergency has occurred that warrants a change in General Plan Foundation Component designations in order to protect the public health, safety or welfare.
5. A Foundation Component Amendment is required to conform to changes in State or Federal law, or applicable findings of a court of law.
6. An amendment is required to comply with an update of the Housing Element or change in State Housing Element law.
7. A Foundation Component Amendment is required to significantly expand basic structural employment (such as industrial, agricultural processing, and research and development), excluding retail, service commercial, warehousing, and residential uses not ancillary to the primary employment use.
8. A Foundation Component change is necessary to facilitate implementation of open space or transportation corridor designations arising from the adopted MSHCP or Community Environmental Transportation Acceptability Program (CETAP) programs that could not be accomplished by a lesser change in the General Plan. (Zoning Ordinance § 2.6)

Private applications to initiate amendment proceedings under these provisions must be made to the Planning Director and comments of the Planning Commission requested. (Zoning Ordinance § 2.6 (D).)

After the conclusion of the 2016 eight-year cycle, the applicant for this GPA should have been required to resubmit an application to initiate this extraordinary amendment proceeding, and obtain the input of the Planning Director and Planning Commission. It is not clear this has been done.

Moreover, none of the limited extraordinary circumstances exists here to justify modifying the General Plan to allow a greater density of housing in this rural area. Mere profit seeking is not justification for an extraordinary Foundation Component Amendment.

A. No New Conditions or Circumstances Exist to Justify the Proposed Modification

The justification for GPA 1196 states, regarding new conditions or circumstances, that the Boulder Springs Specific Plan and Citrus Hills High School have been developed and are denser than the current designation of the site. Neither of these developments constitutes a “new” condition or circumstance. The Boulder Springs Specific Plan was amended in 1988 and again in 2007, clearly not a “new” circumstance now 10 years later.

The Citrus Hills High School opened in 2005, again not a “new” circumstance. In fact, subsequent to the High School opening, proposed regular foundation component amendments have twice been sought for the site. The first round of proposed amendments were previously abandoned upon receiving staff comments they were “not appropriate” when they sought changes to CD: LDR, a lesser density than the currently proposed CD: LDR and CD: MDR. And

then, again, the GPA was re-applied for in 2016 at this proposed density but failed to obtain a vote in favor of initiation in the initiating year.

None of the surrounding developments constitute “new conditions or circumstances” which justify modifying the General Plan where they have existed since the prior General Plan and/or through several regular eight- year foundation component cycles.

Moreover, to the extent the applicant argues the Citrus Hills High School for some reason “needs more clustered development” around the school, the argument is illogical and absurd. The school was developed in 2005 to accommodate the community—the community should not, over 10 years later, be modified to allegedly “accommodate” the school. This circular logic used to rationalize urban sprawl must not be endorsed.

Furthermore, the project as proposed is not “clustered” development. Clustering locates development in only limited areas, at a greater density than otherwise allowed, in order to preserve the remainder of a site in open space or natural habitat. Simply seeking to develop denser than permitted on a portion of the site, *without* preserving the remainder of the site, *is not clustering* development. Clustering thus does not justify modifying the General Plan, but particularly where no new conditions or new circumstances exist.

B. The Modifications Conflict with the Overall Riverside County Vision

The proposed GPA 1196 conflicts with the overall Riverside County Vision. The Riverside County Vision, as summarized, is, “Riverside County is a family of special communities in a remarkable environmental setting.” (General Plan p. V-3) To accomplish this overall vision, the RCIP vision seeks to:

- reflect new growth patterns that no longer reflect a pattern of random sprawl (General Plan p. V-12);
- focus growth near transit stations (p. V-13);
- accommodate rural living in areas committed to that lifestyle (p. V-13);
- sustain rural communities through open space and urban development commitments elsewhere (V-13);
- develop only where adequate public facilities and services are available (V-14);
- develop housing in accordance with the RCIP (V-14);
- strategize housing with improvements to the transportation system (V-15);
- reduce vehicle trips through a land use/ transportation connection compared to earlier patterns of development (V-15);
- communities “focused around existing urban areas with transit opportunities” (V-16);
- develop hubs of complete, compact and transit oriented communities (V-16);
- preserve open spaces, watercourses, and natural streams (V-17 to -18)
- reduce air pollutants through land use strategies reducing commute times and related motor vehicle pollutants (V-18)

The proposed GPA 1196 is inconsistent with the overall vision and these guiding principles. GPA 1196 instead encourages urban sprawl into a rural area not focused around transit facilities; and fails to preserve this unique community committed to a rural lifestyle.

The Rural Community Foundation Component designation applicable to this site was adopted to preserve a rural lifestyle in this area. As stated in the General Plan:

“The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal - keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Small-scale commercial activities, such as local grocery stores, gift shops and drug stores, located outside urban boundaries are needed to serve these rural communities. Small- scale incidental commercial uses are allowed. Agriculture is permitted in these areas.” (General Plan p. LU-49)

Development within areas designated RC should not adversely impact the open space and rural character of the surrounding area. (General Plan p. LU-51)

The RC: VLDR designation applicable to the site:

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

The RC foundation component also allows low density residential; which likewise encourages animal keeping and permits development but has a higher allowable density, ranging from 2 dwelling units per acre to 1 dwelling unit per acre. (General Plan p. LU-50)

GPA 1196 flouts these goals of retaining this area in rural development, and instead proposes to extend the CD component into this area. This extension is inappropriate. CD is intended to depict “areas where urban and suburban development is appropriate” in a pattern “adaptive to transit” that “reduces sprawl.” (General Plan p. LU-55) Yet the site is RC-VLDR land located amidst RC-VLDR, Rural Residential (RR), and RC-LDR land; not amid or adjacent to any land designated for, or developed as, CD, urban, or suburban development. It is impossible to perceive the proposed project doing anything but increasing sprawl into a rural area.

Yet the applicant claims the project will complement surrounding uses and existing communities. This proposed finding is unsupported where surrounding designations are *not* CD, and where the CD designations conflict with the RC rural uses on- and off-site, including

expecting and encouraging animal keeping, agriculture (include the existing Woodcrest 5 Agricultural Preserve onsite), and small scale commercial uses. The mandatory finding that the proposed GPA 1196 is consistent with the Riverside County Vision cannot be made based on these facts before the Board.

C. No Condition Exists or Event Has Occurred that is Unusually Compelling and can Only Be Rectified by Making Changes in the Current Foundation Component

As discussed above, no new conditions or events *at all* have occurred with respect to the area or the site, let alone one that is “unusually compelling” or “can only be rectified by making changes in the current foundation component.” A mere preference to develop the site at a greater density that currently planned and permitted is insufficient justification for an Extraordinary Foundation Component Amendment.

Notably, the applicant could seek a GPA to develop denser than currently permitted without a Foundation Component Amendment. The applicant could seek an amendment from RC: VLDR to RC: LDR, i.e., still comply with the RC Foundation Component; and be able to develop up to double to the current designation while encouraging equestrian and other animal-keeping uses consistent with the rural nature of the community. A change to the Foundation Component is unnecessary and certainly not predicated by a new “unusually compelling” condition or event.

D. None of the Other Required Extraordinary Circumstances has Occurred Requiring a Foundation Component Amendment

As discussed above, to obtain an extraordinary Foundation Component amendment, one of the following must apply:

3. An unconstitutional taking of property might occur without the amendment, and the amendment alters the General Plan Foundation Component only to the extent necessary to avoid the potential taking.
4. A natural or man-made disaster or public emergency has occurred that warrants a change in General Plan Foundation Component designations in order to protect the public health, safety or welfare.
5. A Foundation Component Amendment is required to conform to changes in State or Federal law, or applicable findings of a court of law.
6. An amendment is required to comply with an update of the Housing Element or change in State Housing Element law.
7. A Foundation Component Amendment is required to significantly expand basic structural employment (such as industrial, agricultural processing, and research and development), excluding retail, service commercial, warehousing, and residential uses not ancillary to the primary employment use.
8. A Foundation Component change is necessary to facilitate implementation of open space or transportation corridor designations arising from the adopted MSHCP or Community Environmental Transportation Acceptability Program (CETAP)

programs that could not be accomplished by a lesser change in the General Plan.
(Zoning Ordinance § 2.6)

None of these unique situations has been shown to have occurred here. Consequently, GPA 1196 cannot be initiated. Mere preference or profitability is insufficient justification for a Foundation Component Amendment.

II. GPA 1196 SHOULD NOT BE INITIATED BECAUSE IT WILL RESULT IN SIGNIFICANT ADVERSE ENVIRONMENTAL AND COMMUNITY IMPACTS.

In addition to failing to meet the requirements of the Zoning Ordinance for a Foundation Component Amendment; the County should decline to initiate GPA 1196 as it would result in significant adverse effects to the environment and community.

A. Aesthetics

Developing at a higher density than currently allowed at the site will introduce a new source of substantial light and glare from residences and vehicles. This could impact nighttime views as well as adversely affect biological resources in the area.

B. Agricultural Resources

The site contains farmland designated: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and land included in the Woodcrest 5 agricultural preserve (Project APNs 321-090-007, -026, and -052). GPA 1196 proposes to convert this significant agricultural land to a non-agricultural use via the change in designation to CR. Significant adverse impacts to agricultural resources are likely to result from this direct farmland conversion.

Moreover, by proposing suburban development in this rural area, secondary conflicts with existing agricultural uses are likely to result. For instance, hazard impacts may result from introducing additional residents and vehicles amidst farm equipment. Increased development pressure on rural and agricultural uses is also likely from the proposed suburbanization of the site. The Board can avoid these adverse effects by declining to initiate this proposed GPA.

C. Air Quality

GPA 1196, by proposing to develop contrary to the General Plan provisions adopted to reduce air pollutant emissions by developing nearby transit and amenities, would significantly increase vehicle pollutant emissions and GHGs. In other words, the proposal would increase vehicle miles travelled, adding to transportation emissions and GHGs. GPA 1196 also proposes to substantially increase traffic in this area, again adding to mobile source air pollutant emissions that would not occur with smart development in existing urban and suburban areas.

///

D. Biological Resources

The site is located nearby to an 180-acre area which warrants conservation under the MSHCP. The site also contains an arroyo and potential other biological resources, such as burrowing owls, that would be adversely impacted by the density proposed in this development. Furthermore, since converting from active agricultural use, much of the site has reverted to a more natural state containing additional biological resources since environmental assessments were previously prepared.

GPA 1196 would cause adverse impacts to biological resources directly through grading and developing more land to accommodate denser uses; introducing additional residents and their pets moving to the site; introducing additional lighting to the site; etc. Increased noise, traffic, and other operational characteristics of suburban residential development could also adversely affect biological resources onsite and in the area.

E. Cultural Resources

Cultural resources are known to occur on the site, and are likely to occur on site and in the project vicinity. Introducing a larger/ denser development footprint and additional persons in proximity to important cultural resources would create a new or more severe adverse impact compared to the current land use designations.

The area is also one of paleontological sensitivity. Denser housing, and the services and amenities needed to service that housing (i.e. water, sewer, etc.) would have a potentially significant impact, and greater impact, on paleontological resources compared to current land use designations. This additional impact can be avoided by declining to initiate this GPA.

F. Land Use/ Planning

As discussed above, GPA 1196 will have adverse impacts to land use and planning where the land use proposed utterly fails to comply with the General Plan and Zoning Ordinance. The proposal would result in an incompatible pattern of piecemeal development averse to true community planning. Moreover, the proposed development misses the mark in claiming to "cluster" development in conformity with the General Plan where it, in fact, just seeks to permit higher density development across the site.

G. Noise

The introduction of substantially greater numbers of residents into this rural area would generate noise levels far in excess of existing levels. In addition to construction noise effects, air conditioner noise and traffic noise is likely to be well above ambient levels currently enjoyed in this rural community. In fact, the General Plan recognizes that mobile noise sources may be the

most annoying noise producers in the community. (See, General Plan Noise Element) Loud suburban noise from people and vehicles in proximity to equestrian uses may also result in adverse impacts to public safety.

H. Recreation

Recreation and trails may be adversely effected by the conversion to suburban uses, particularly in the middle of this rural, equestrian area. Community trails and dedications would be essential to ensuring the rural community recreational facilities, both formal and informal, not decline. Indirect impacts to recreation as well, such as conflicting uses by motorized vehicles and equestrians, could result from this incompatible proposed GPA 1196.

I. Transportation/ Traffic

Transportation and traffic impacts would be new and more severe in this area where the proposed GPA 1196 would significantly increase trip generation in this area and, due to its rural location, necessitate trips outside of the community for work, shopping, etc. GPA 1196's failure to comply with the vision and policies of the General Plan to reduce impacts by focusing development on already urbanized areas adjacent to transit will likely result in traffic impacts.

Furthermore, the project will likely increase hazards through incompatible uses by installing higher density development and comparatively high volumes of traffic within the existing rural, equestrian and agriculturally focused residential community.

J. Utilities

New and/or expanded utilities are likely needed to serve the proposed density of the project. On- and off-site effects of such expansion, and growth inducing effects, justify a vote to decline to initiate this GPA.

III. CONCLUSION

For each of the reasons outlined herein, I respectfully ask the Board of Supervisors decline to initiate GPA 1196 and preserve the character and values of this unique rural community.

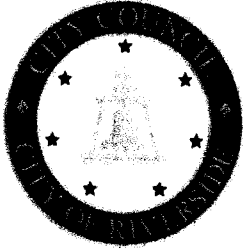
Thank you for your consideration of these comments.

Sincerely,



Kimberly Foy, Esq.

JOHNSON, SMITH & FOY



May 22, 2017

Riverside County Board of Supervisors
4080 Lemon, 5th Floor
Riverside, CA 92501

From the Office of Councilman Paul Davis

RE: Impending County Zone Change Negatively Impacts Ward 4

Honorable Riverside County Board of Supervisors,

The issue of a new housing tract behind and around Citrus High School in the County area has been brought to my attention. After hearing both sides of the issue by the proponents and opponents and studying the impacts to the area of Ward 4 from Wood to Van Buren and surrounding areas, I have determined that the zone change being proposed would cause significant issues with both traffic, pollution, and overall significant decrease in the quality of life. The zone change, which will facilitate what was to be a low-density area, will create a very high density area would not serve neither the county, nor the city of Riverside well. No mitigations have been offered to lessen or eliminate the impacts in any way, so I urge all residents on both sides of the invisible line to join with me and Supervisor Kevin Jefferies and oppose this impending change by contacting all the remaining Supervisors and tell them to just say "NO". Keep the area as it was designed, low density rural.

If I may answer in any questions please do not hesitate to contact me anytime at: 951-453-1625 or PDavis@riversideca.gov.

Sincerely,

Councilman Paul Davis
City of Riverside – Ward 4

PD:nt

No2Rezoning.org

www.no2rezoning.org

May 22, 2017

Board of Supervisors of Riverside County
County Administration Building
4080 Lemon Street, Fifth Floor
Riverside, California 92501

Request for Placement in Official Record

Emails: district1@rcbos.org,
district2@rcbos.org,
district3@rcbos.org,
district4@rcbos.org,
district5@rcbos.org.

Re: Board Action May 23, 2017 on Agenda Item 16-1: General Plan Amendment Initiation Procedures for General Plan Amendment No. 1196.

Dear Honorable Supervisors:

The following organizations, No2rezoning.org, Residents Association of Greater Lake Mathews ("RAGLM"), Residents Association of Mead Valley ("RAMV"), and the Greater Lake Mathews Rural Trails Association ("RGLMRTA") as well as other community groups representing over 100,000 residents residing in the area known as Greater Lake Mathews and Greater Mead Valley areas are VERY STRONGLY and unitedly opposed to General Plan Amendment ("GPA") 1196 that proposes to **change the Rural Foundation Component of the General Plan from Rural Community to Community Development**, and to **amend the Land Use Designation from Very Low Density Residential to Medium Density Residential**. These proposed changes of 238.5 acres zoned rural one acre to medium and high density urban zoning threaten the rural existence of the entire area from the I-215 to the I-15 just south of the City of Riverside.

GPA 1196, a Rural Foundation Component change request:

- violates the principles of the General Plan Certainty System designed to stop leap frog development into rural areas;
- is clearly inconsistent with the Riverside County General Plan Vision, the Lake Mathews and Mead Valley Area Plans and the Lake Mathews and Mead Valley Community Plans;
- is located in a solidly rural community that is not situated anywhere near a Community Development area with urban densities;
- would require substantial infrastructure improvements including transportation, more schools, sewer and prevention of potential flooding;

- will encourage and promote further urbanization efforts; and
- promotes the financial interests of non-resident land owners at the expense of local residents' investments in their property and lifestyle.

1. The FGPA Application appears to have been filed too late and therefore is improperly before the Board.

The FGPA Application filing period began on April 4, 2016 and ended June 2, 2016. If the Applicants' application was not filed on or before June 2, 2016, it was untimely filed and cannot be considered by the Board.

It appears that the Application was filed too late. A careful review of the application available and included in the October 19, 2016 Planning Commission Agenda as item 2.10 reveals NO filing stamp thereon. In fact, the only date anywhere within that Application is a handwritten date of June 1, 2016 suggesting the conclusion that the Application was not received on or before June 2, 2016.¹

If the Application was not filed on or before June 2, 2016, it was untimely and cannot be considered by the Board.

2. Even if the Application was Timely Filed, The Amendment Application is not Proper in that it is Outside the Permitted Consideration Period.

The Foundation Component Amendment failed to be initiated during the critical and timely 2016 eight year cycle of the update to the General Plan and therefore must be denied approval.

SECTION 2.5. GENERAL PLAN FOUNDATION COMPONENT AMENDMENTS - REGULAR.

A. APPLICABILITY. This Section shall govern the processing of regular Foundation Component Amendments occurring during the Eight-Year General Plan Review Cycle including any General Plan amendment to change:

1. The Riverside County Vision;
2. The General Planning Principles set forth in General Plan Appendix B;

B. LIMITATION ON FOUNDATION COMPONENT AMENDMENTS. Except as otherwise provided in Section 2.6. and Section 2.7., **no Foundation Component Amendment shall be heard or approved except as part of the Eight-Year General**

¹ Riverside County Planning Dept. Staff Report regarding Agenda Item 2.10 (GPA 1196) for Planning Comm'n Hearing on Oct. 19, 2016, at. 486.

Plan 2008 and continue during the 2008 calendar year, and subsequent cycles shall occur at eight calendar year intervals thereafter (Ordinance 348.4840).

Emphasis added.

The Amendment Application Period began on April 4, 2016 and ended on June 2, 2016.² As indicated above, section 2.5.B of the Riverside County General Plan requires that the "...Amendment shall be heard or approved..." during the cycle calendar year. The Amendment process, assumedly begun in 2016, was not "heard or approved" during 2016. It first came before the Board of Supervisors ("the Board") for hearing on March 14, 2017 and is therefore outside of the General Plan requirements.

3. Even if the Application is Timely Before the Board, There is NO Appropriate Justification Provided for a Foundation Change from Rural to Urban Land Use for This Project Because No NEW Conditions or Circumstances Exist.

The proposed site is located within the community of Glen Valley where mixes of residential and agricultural uses enhance the rural nature of the area. The area is defined by a rustic lifestyle and a desire for larger lot sizes, such as 1, 2 and more acres. The site is vacant, as well as those to the north, northwest, and south. Some single family residences are located to the east and west.

The Staff Report of the Riverside County Planning Department prepared for and presented to the Planning Commission for consideration on October 19, 2016 of Agenda Item 2.10, citing the General Plan, reminds all of the requirement for the presentation of "...evidence demonstrating new conditions or circumstances..." "... to justify a Foundation Component Amendment".³ No acceptable "evidence" has been provided to show that new conditions or circumstances are present in the area to justify the proposed change to higher density uses despite the Staff Report's conclusion that the evidence attached to their Report amounts to "new evidence or circumstances."

The justification cited by the Staff Report refers to the existence of Citrus Hill High School ("CHHS") and the development of the Boulder Springs Specific Plan.⁴ However, these are NOT new conditions. Both existed since 2005 and were not considered new conditions when the

² Riverside County Planning Dept. 2016 Property Owner Initiated Foundation General Plan Amendment Announcement, ca. Mar. 8, 2016.

³ Riverside County General Plan, Chapter 11, Required & Optional Findings, para. 3 (Foundation Amendment Findings), Dec. 8, 2015: "a. The foundation change is based on substantial evidence that new conditions or circumstances disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan". Emphasis added.

⁴ Riverside County Planning Dept. Staff Report regarding Agenda Item 2.10 (GPA 1196) for Planning Comm'n Hearing on Oct. 19, 2016, at. 492.

Planning Department found GPA 1006 and 1016 Amendment Applications “not appropriate” in 2008.

In fact, an authorized representative for the developers/investors after repeated questions as to justification admitted that there was no “justification” at the Woodcrest MAC meeting on Thursday, May 11, 2017 with about 80 residents present that the only real reason for GPA 1196 is monetary gain because the owners and developers do not believe they can realize a sufficient profit by building one acre lot homes. That is not the type of justification required by the General Plan and Ordinance and thus the Staff Report, and the Planning Commission approval based upon the Staff Report fail.

Previous attempts to change the Rural Community Foundation (Rural Residential) to Community Development Foundation (high density urban) for this property have failed. Riverside County Planning Department staff correctly recommended that virtually the same Foundation changes “would not be appropriate” and that “substantial evidence has not been provided to show that new conditions or circumstances are present in the area to justify the proposed change to higher density uses . The Planning Department staff recommended, “that adoption of an order initiating proceedings for General Plan Amendment No. 1006 from Rural Community: Very Low Density Residential to Community Development: Medium Density Residential would not be appropriate”.⁵

4. The Certainty System Preserves Stability and Flexibility in the General Plan Over Time and is Violated by Approval of GPA 1196.

The Riverside County General Plan Certainty System provides clarity regarding the interpretation and use of the General Plan in ongoing decision making, and seeks to sustain the Plan's policy direction over time.⁶ It recognizes that circumstances will change, imperfections in the Plan will be discovered, and events will occur that require changes in the Plan. **The overriding consideration, however, is the absolute necessity to maintain a high level of confidence in the Plan and enable people affected by it to have reasonable expectations regarding how the Plan will impact them.** The Certainty System serves the needs of those who value a rural lifestyle, farmers who have invested in their operations, and developers who want to ensure return on their investments. The System also ensures that open space is preserved in the County for the benefit of all. RCIP, Chapter 1.

State law limits amendments to the General Plan to four times per year. Each one can include multiple areas of change. The Certainty System takes the state guidelines a step further by identifying specific amendment categories and a time frame within which each can be considered for amendment to the General Plan. It is essential to the integrated character of this plan that changes made to it do not create inconsistencies with other parts of the Plan. RCIP, Chapter 1.

⁵Riverside County Planning Dept. Staff Reports regarding Agenda Items 6.4 (GPA 1006) and 6.6 (GPA 1016) for Planning Comm'n Hearing on Aug. 12, 2008.

⁶ Riverside County General Plan, Chapter 11: Administration, General Plan Certainty System.

5. GPA 1196's Inconsistency With the County's Vision.

GPA 1196 is clearly inconsistent with Riverside County's vision.⁷

The Rural General Plan Foundation Component is intended to identify and preserve areas where the rural lifestyle is the desired use, including areas of remote cabins, residential estates, limited agriculture, equestrian, and animal keeping uses. In the future, the challenge will focus on preserving the character of established rural areas while accommodating future growth, preventing the encroachment of more intense urban uses, and ensuring compatibility between rural and urban uses.⁸

The proposed project site is surrounded by Rural A-1-1 and RA-1 homes on one acre. Woodcrest Estates Community is one acre rural equestrian ranch homes. Hill Top Estates (now known as Boulder Springs Summit) are also one acre rural equestrian homes. The area west of Wood and north of Markham are one acre or larger rural equestrian properties.

6. GPA 1196's Negative Impacts on the Community.

Not only does the proposed project not meet the criteria outlined in the General Plan for a Foundation Component Change and is inappropriate for the area, there are major negative issues of concern regarding traffic, infrastructure, sewer, schools, water, habitat and ecology, cultural resources, and encouragement of further urbanization of the community contrary to community wishes.

Traffic. This proposed project will bring an additional 10,000 vehicle trips per day onto already overburdened and gridlocked streets surrounding two high schools on Wood Road. Avenues "C" and "D" will connect to Cable Lane which is the only exit out of Woodcrest Estates a quiet rural equestrian neighborhood with one acre lots. Residents will no longer be able to get out of their driveways along Markham Road, Cable Lane, "C" Street and Wood Road most of the day. A long line of cars will be trying to access Markham Street at Cable Lane at the four way stop. No Traffic Signals are proposed at Cable Lane, Cole, Parsons Street, "B" and "C" streets. Massive traffic congestion already exists and 10,000 additional vehicles trips per day will increase this congestion substantially for the entire area. Even if traffic signals are installed the amount of traffic flow will still create gridlock on roads surrounding this proposed project.

Inappropriate Roads. The only road improvements proposed are the addition of one lane along Wood Road from "C" to "D" streets and the addition of one additional lane along Markham to the end of the project boundaries. The other side of these roads will continue to be one lane, narrow, hilly, rural and dangerous roads for residents intent on moving quickly. The Transportation Department currently has a road sign posted that states, "Hill Blocks View - 35 mph" a few hundred feet north of "C" Street on Wood Road. Wood Road sits on top of a hill

⁷ Riverside County General Plan, Chapter 2: Vision Statement.

⁸ Riverside County General Plan, Chapter 3: Land Use Element.

with steep embankments on the west side of the road. Wood Road has a steep grade and vehicles are going 60-70 mph down that hill just before the signal light leading into Citrus Hill High School. A number of homes would need to be removed along Wood Road to widen this thoroughfare into four lanes. The expense of widening surrounding roads such as Markham, Wood and Cajalco are not possible at this time with the limited funding available in the County budget. The developer is not willing to make necessary infrastructure improvements such as signal lights at Cable Lane, Parsons Road, Cole, "C" and "B" streets. Markham and Wood Roads will need to be widened to 4 lanes from Alexander to Wood Road and Wood Road from Krameria to Cajalco Road. Adding 10,000 more vehicle trips per day will increase the dangers to our children going to school and residents commuting to work dramatically for the entire area. There are two high schools on Wood Road. Van Buren is already at capacity and gridlocked a good portion of the day. Cajalco Road is another road that is gridlocked most of the day.

Water Unavailability and Contamination. Water is yet another issue of concern. There are a number of blue line streams throughout the project area. A protected arroyo exists north of "C" Street. Water from this arroyo travels into Mockingbird Creek increasing flooding hazards for Mockingbird Canyon and Mockingbird Dam. It was not that many years ago that Mockingbird Creek overflowed its banks and took out Mockingbird Canyon Road costing Riverside County millions of dollars to repair. The other blue line streams flow into Cajalco Creek that empties into Lake Mathews which serves as drinking water for millions of residents.

Cultural Resources Endangerment. Environmental Assessment 39832 for Tentative Tract Map No. 32822⁹ approved in 2006 clearly describes several intact cultural sites are present on the proposed project site. EA 39832 was created over 11 years ago and there have been a number of changes to state law since then increasing protection of impacted cultural sites.

On September 25, 2014, Governor Brown signed Assembly Bill No. 52¹⁰, which creates a new category of environmental resources that must be considered under the California Environmental Quality Act ("CEQA"): "tribal cultural resources." The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures.¹¹

AB 52 adds tribal cultural resources to the categories of cultural resources in CEQA, which had formerly been limited to historic, archaeological, and paleontological resources. "Tribal cultural resources" are defined as either (1) "sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" that are included in the state register of historical resources or a local register of historical resources, or that are determined to be eligible for inclusion in the state register; or (2) resources determined by the lead agency, in

⁹ Riverside County Planning Dept. Environmental Assessment Form: Initial Study dated Aug. 15, 2006, pp. 10-12.

¹⁰ Calif. Public Resources Code, sec. Section 5097.94, and other minor sections.

¹¹California Land Use and Development Law Report.

its discretion, to be significant based on the criteria for listing in the state register. Calif. Land Use and Development Law Report.

Under AB 52, a project that may cause a substantial adverse change in the significance of a tribal cultural resource is defined as a project that may have a significant effect on the environment. Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. Calif. Land Use and Development Law Report.

Tentative Track Map No. 32822 is a 103 acre portion of the project site. The rest of the 238.5 acres of GPA 1196 project have yet to be reviewed and could quite possibly contain a number of other tribal cultural resources. The Cajalco Creek area is a prime location for cultural sites of historic importance and at one time was a location for one of the largest Native American villages in the area. Much of the project site was orange groves, but there are vast amounts of the property that was left vacant.

Inadequate Schools. Schools have not been evaluated for this project. Val Verde elementary and middle schools in Mead Valley are already at capacity. The Val Verde Unified School District is spending the remainder of their bond funds on a new high school being built in Perris. There is no funding available to build any new schools and it is unlikely that voters will approve another bond measure. Changing from rural one acre zoning to urban 5 homes per acre will require increasing class sizes or possibly adding portable classrooms. The difference between 238 rural homes being built compared to 1190 high-density homes would result in 5200 additional children attending Mead Valley Schools immediately as well as encourage more development with the consequent school needs.

Wildlife and Wildlife Habitat Endangerment. Wildlife and wildlife habitat have not been adequately evaluated. At least some if not all of the project site is part of the Woodcrest Agricultural Reserve and at one time was filled with orange groves. Quite a few years have passed since these trees were removed and wildlife habitat and wildlife are now present in abundance on and in the vacant land. Burrowing owls, hawks, black tailed jackrabbits, roadrunners, song birds, K-rats and even mountain lions have been observed on the project site.

Burrowing owls are dying at alarming numbers as their habitat is being destroyed in Western Riverside County. Borrowing owls will soon become extinct in Western Riverside County as their habitat is being destroyed that they require to exist. Relocation of these owls has not been very successful. Riverside County has been a leader in the preservation of open space for habitat so that endangered and threatened animals and plants can survive. Burrowing owls are thriving on this property at record numbers.

Inadequate Sewer Services. The current sewer system provided by Western Municipal Water District is already at capacity. Changing the Rural Foundation Component of the General Plan from Rural Community to Community Development and to amend the Land Use Designation from Very Low Density Residential to Medium Density Residential will require a new sewer line and infrastructure upgrades.

Danger for Low Income Retired & Immigrant Residents of Mead Valley. The impact of GPA 1196 approval on the existing communities of Greater Mead Valley which I believe are largely low income retired people and former immigrants originally from Mexico and Guatemala should be a major concern for the Board. They will suffer by decreasing property values, diminished open space, and further rezoning encouraged by GPA 1196 approval. They moved to this area because it was inexpensive, with large properties, peaceful, animal friendly, less regulated, and welcoming. They do not deserve this abandonment of government protection of their communities and they lack the resources and ability to flee.

I urge you to vote NO on GPA 1196.

- A) The Foundation Component Amendment failed to be filed by the deadline established.
- B) The Foundation Component Amendment failed to be initiated during the critical and timely 2016 eight year cycle of the update to the General Plan.
- C) GPA 1196 does not meet the requirements of an Extraordinary Foundation Component Amendment and therefore must be denied approval.
- D) GPA 1196 is clearly inconsistent with the County's vision.
- E) GPA 1196 violates the Certainty Principle designed to stop leap frog development into rural areas.
- F) GPA 1196 is located in a solidly rural community that is not situated anywhere near a Community Development area with urban densities.
- G) Substantial and very costly infrastructure improvements would be required including transportation, sewer system infrastructure and major flooding prevention, additional schools, protection of endangered habitat, and protection of cultural resources.
- H) GPA 1198 needlessly and unwarrantedly promotes the financial interests of non-resident land owners at the expense of the local residents' investments in their property and lifestyle.

The population of the affected and adjacent communities unanimously demand rejection of GPA 1196 and similar efforts to rezone. Not one resident of the area has expressed support for this amendment. Your constituents deserve and require your protection against yet another unnecessary, unwanted, and unjustified incursion into their community. The supervisor who knows this district and the affected area has asked that you join him in denying approval and his recommendation show be respected and followed.

Respectfully submitted,

No2Rezoning.org

[signed]

John L. Minnella, BA, JD, Lic. en Der.
Chair
RAGLM Board Member

1820 E. 17th St.
Santa Ana, CA 92705-8604
drjminnella@yahoo.com
minnellalaw@sbcglobal.net

May 22, 2017

Riverside County Board of Supervisors

Clerks of the Board and Project Planner John Hildebrand

RE: Item 16-1: General Plan Amendment No. 1196, May 23, 2017 Hearing

Dear Members of the Board:

I, Ray Varela, property owner on Avenue C, live directly across the proposed planned development which is the subject of GPA 1196. I am writing to inform you that I am adamantly opposed to this development. The application request is not suitable density for this area. Furthermore, it will negatively impact the established rural neighborhoods that surround this development.

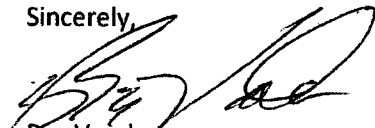
Our county plan foundation defines our area as rural. People that purchased properties in this area did so with this knowledge. Riverside County is comprised of numerous areas of different zoning, such as very high density, high density, low density, etc. What makes our County so unique is that Riverside County residents can move within the county to meet their family's needs. My family and I moved from a home on a 7,200 foot lot home several years ago to our current home on a 1.2 acre lot in order to now live a rural lifestyle.

I grew up in Norco, California in an established rural community. When I married and established my family, we first moved to Moreno Valley, then Riverside, then to our current home in unincorporated Riverside. Mine and my wife's dream is to have horses, goats and chickens on our property. Our children are preparing to move out and begin their own adult lives. We plan on building a casita so that my daughter will be able to stay on our property, and my grandchildren can experience what I did as a child. Rural living is hard to find, but the benefits are incredible. This must be true because homes on 1-acre properties in this area are hard to find and don't stay on the market for very long.

This new development with 7,200 square foot lots is being developed to be built across the street from my house. Our dreams of rural living are vanishing. Foreign land owners that have no interest at all in doing what is right for Riverside and for the thousands of rural homeowners have managed to put our lives in their hands.

Honorable Supervisors, I ask you, Who benefits from this rezoning? It is certainly not the rural community of Unincorporated Riverside!

Sincerely,



Ray Varela

19031 Avenue C

Perris, CA 92570

May 22, 2017

Riverside County Board of Supervisors

Clerks of the Board and Project Planner John Hildebrand

RE: Item 16-1: General Plan Amendment No. 1196, May 23, 2017 Hearing

Dear Members of the Board:

I, Nancy Varela, property owner on Avenue C, live directly across the proposed planned development which is the subject of GPA 1196. I am writing to inform you that I am adamantly opposed to this development. The application request is not suitable density for this area. Furthermore, it will negatively impact the established rural neighborhoods that surround this development.


Our county plan foundation defines our area as rural. People that purchased properties in this area did so with this knowledge. Riverside County is comprised of numerous areas of different zoning, such as very high density, high density, low density, etc. What makes our County so unique is that Riverside County residents can move within the county to meet their family's needs. My family and I moved from a home on a 7,200 foot lot home several years ago to our current home on a 1.2 acre lot in order to now live a rural lifestyle.

I wake up every morning to roosters crowing from my neighbors' homes, and horses neighing. We watch the jack rabbits hopping along our property and have even had to chase away a few coyotes. We are planning to build a casita on our property so that my soon to be married daughter can begin her new married life with her husband.

The promise of what we believed when we moved here is now seriously in jeopardy if the foreign landowners are able to rezone the 238 acres that surround our home and our rural neighbors into lots as little as 7,200 square feet. The landowners have an absolute right to develop their property, but should do so based upon its current zoning.

Honorable Supervisors, I ask you, Who benefits from this rezoning? It is certainly not the rural community of Unincorporated Riverside!

Sincerely,


Nancy Varela
19031 Avenue C
Perris CA 92570

Hildebrand, John

From: Nancy Lacey <nclacey04@yahoo.com>
Sent: Monday, May 22, 2017 1:29 PM
To: Hildebrand, John
Subject: Board of Supervisors Meeting 5-23-17

Re: Public Hearing Agenda Item 16
Initiate Proceedings for General Plan 1196
Lake Mathews/Woodcrest Area Plan

This is to register my strong opposition to approval of the proposal to initiate proceedings to change the current Lake Mathews/Woodcrest Area Plan which would allow higher density building lots.

Nancy C. Lacey
18605 Chickory Drive
Riverside, CA 92504
951-780-9008

Hildebrand, John

From: Maxwell, Sue
Sent: Monday, May 22, 2017 10:48 AM
To: Laurie Sabo; Supervisor Jeffries - 1st District; Hildebrand, John
Subject: Public Comment - Opposing GPA 1196 (May 223, 2017 Item No 16.1, MT No 3713)_Sabo

Good morning Ms. Sabo,

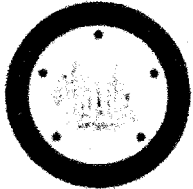
The Clerk of the Board of Supervisors received a copy of your email to Supervisor Jeffries and John Hildebrand in opposition to General Plan Amendment 1196.

Your email is being distributed to the appropriate areas, and printed and included as Back-up to Agenda Item 16.1 for the May 23, 2017 Board Meeting.

Wishing you a pleasant day, and with warm regard,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>



NOTICE: This communication is intended for the use of the individual or entity to which it is addressed and may contain **information that is privileged, confidential and exempt from disclosure** under applicable law. If the reader of this communication is not the intended recipient or the employee or agent responsible for delivering this communication to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by reply email or by telephone and immediately delete this communication and all its attachments.

From: Laurie Sabo [mailto:laurlee44@gmail.com]
Sent: Monday, May 22, 2017 10:14 AM
To: Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Hildebrand, John <JHildebr@RIVCO.ORG>; COB <COB@RIVCO.ORG>
Subject: ITEM 16-1: GENERAL PLAN AMENDMENT NO. 1196

To: Riverside County Board Of Supervisors, Clerk of The Board and Project Planner John Hildebrand

Re: ITEM 16-1: GENERAL PLAN AMENDMENT NO. 1196, May 23, 2017 Hearing

Dear members of The Board,

I, Laurie Sabo, am a property owner, tax payer, and voter and live adjacent to the property mentioned in GPA 1196 and I am opposed to any change in that property being rezoned. The application request is not a suitable density for this area.

The county plan foundation defines our area as rural. Our lifestyle involves open space, space between our neighbors, equestrian property and trails. We purchased our home in this specific area due to larger lot sizes. People pay more to purchase homes and property in this area because as time goes on, these rural properties are more scarce. There are plenty of other places to live with medium to high density urban housing. Our county is unique in its offering of a rural lifestyle. It is our heritage to protect these rural communities.

This community can not afford urban housing due to cut backs within County Sheriff's Department, Code Enforcement and Cal Fire. The elementary schools and middle schools are nearly at capacity. The roads surrounding the property are very dangerous as they are congested and only one lane in each direction. There are not even sidewalks for our children to get to school except directly around school property. Improving these roads would require eminent domain.

Let us not forget to protect our open spaces and the 11 endemic species in this area. The burrowing owl is a California Species of Special Concern (SSC) and is protected by the Migratory Bird Treaty Act (MBTA). Additionally, the Project area is within the MSHCP survey area for burrowing owl. The Stephens' Kangaroo Rat has been observed in the project area. Two Sensitive wildlife species are known to live in areas nearby; San Diego black-tailed jackrabbit and golden eagle (*Aquila chrysaetos*). Both are listed as a state SSC by CDFW, and are a "covered species" under the MSHCP. Riverside fairy shrimp [*Streptocephalus wootoni*] have also been sighted during our recent rains where water had collected.

As you are aware, residents and community organizations such as RAGLM, GLMRTA, Woodcrest MAC and Paul Davis of Riverside, are opposed and have done so publicly.

As County Supervisors you are stewards of the county and for the well being of the general public we ask you to support our opposition on May 23, 2017.

Please include this letter to be part of public record. Thank You.

Sincerely,
Laurie Sabo

Hildebrand, John

From: Laurie Sabo <laurlee44@gmail.com>
Sent: Monday, May 22, 2017 10:19 AM
To: District5; COB; Hildebrand, John
Subject: Re: ITEM 16-1: GENERAL PLAN AMENDMENT NO. 1196

To: Riverside County Board Of Supervisors, Clerk of The Board and Project Planner John Hildebrand

Re: ITEM 16-1: GENERAL PLAN AMENDMENT NO. 1196, May 23, 2017 Hearing

Dear members of The Board,

I, Laurie Sabo, am a property owner, tax payer, and voter and live adjacent to the property mentioned in GPA 1196 and I am opposed to any change in that property being rezoned. The application request is not a suitable density for this area.

The county plan foundation defines our area as rural. Our lifestyle involves open space, space between our neighbors, equestrian property and trails. We purchased our home in this specific area due to larger lot sizes. People pay more to purchase homes and property in this area because as time goes on, these rural properties are more scarce. There are plenty of other places to live with medium to high density urban housing. Our county is unique in its offering of a rural lifestyle. It is our heritage to protect these rural communities.

This community can not afford urban housing due to cut backs within County Sheriff's Department, Code Enforcement and Cal Fire. The elementary schools and middle schools are nearly at capacity. The roads surrounding the property are very dangerous as they are congested and only one lane in each direction. There are not even sidewalks for our children to get to school except directly around school property. Improving these roads would require eminent domain.

Let us not forget to protect our open spaces and the 11 endemic species in this area. The burrowing owl is a California Species of Special Concern (SSC) and is protected by the Migratory Bird Treaty Act (MBTA). Additionally, the Project area is within the MSHCP survey area for burrowing owl. The Stephens' Kangaroo Rat has been observed in the project area. Two Sensitive wildlife species are known to live in areas nearby; San Diego black-tailed jackrabbit and golden eagle (*Aquila chrysaetos*). Both are listed as a state SSC by CDFW, and are a "covered species" under the MSHCP. Riverside fairy shrimp [*Streptocephalus wootoni*] have also been sighted during our recent rains where water had collected.

As you are aware, residents and community organizations such as RAGLM, GLMRTA, Woodcrest MAC and Paul Davis of Riverside, are opposed and have done so publicly.

As County Supervisors you are stewards of the county and for the well being of the general public we ask you to support our opposition on May 23, 2017.

Please include this letter to be part of public record. Thank You.

Sincerely,



Laurie Sabo
19120 Sterling Hill Ln.
Perris, CA 92570

Hildebrand, John

From: Maxwell, Sue
Sent: Monday, May 22, 2017 9:39 AM
To: Jill Stingley; Hildebrand, John
Subject: Public Comment - Opposing GENERAL PLAN AMENDMENT NO 1196 (May 23, 2017, Item No 16.1, MT No 3713)

Good morning Ms. Stingley,

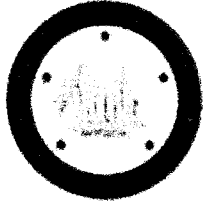
The Clerk of the Board of Supervisors received your email in opposition to GPA 1196, and has forwarded it to the appropriate areas for review.

Your comments have been printed and added as Back-up to Agenda Item 16.1 for the May 23, 2017 Board Meeting.

Thank you, and have a nice day,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>



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From: Jill Stingley [mailto:jillstingley@aol.com]
Sent: Monday, May 22, 2017 7:18 AM
To: COB <COB@RIVCO.ORG>
Subject: AGENDA ITEM 16-1: GENERAL PLAN AMENDMENT INITIATION PROCEDURES FOR GENERAL PLAN AMENDMENT NO. 1196.

Good morning,

I'm writing about concerns to your plans of re zoning our area out here in our rural community.

Being a realtor for years and watching the growth of our city and others like it, the one thing that I find constant is change.. just like life.

However, the change that I see happening in our rural areas is the city, and county don't seem to care about its citizens that are already living here, raised here, enjoying our quiet area away from the city day to day crap that goes on. I have watched several communities grow, changing the zoning, thus pushing the citizens that have lived and loved there OUT..

Our city, and county officials sell out their citizens for more cash to their pockets, leaving US, that live here, holding the bag, and having to deal with the new dense community gripes, headaches that these new citizens bring in.

The new citizens want affordable housing and yes new construction, then they look outside their surrounding neighborhood, complain, complain, complain. The county then gets involved in our lives only to police us into changing what we didn't need to change in the first place.. the new dense housing folks weren't here.. WE were.

The beauty of our neighborhood is our open space, our peace, quiet and tranquility. Honestly, if we wanted differently, we would relocate to city crap.. keep us rural.. we deserve that.. we paid for it..

Please don't push we the citizens of our rural community out.

Thank you

Jill Albrecht-Stingley

Riverside Real Estate Professionals

BRE 01343326

(909) 241-1225

Sent from AOL Mobile Mail

Get the new AOL app: mail.mobile.aol.com

Hildebrand, John

From: Maxwell, Sue
Sent: Monday, May 22, 2017 9:00 AM
To: Margaret Lindou
Cc: Hildebrand, John
Subject: Public Comment - Opposing GPA 1196 on May 23, 2017, Agenda Item 16-1 MT No 3713

Good morning Ms. Lindou,

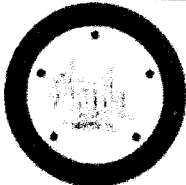
Thank you for contacting the Clerk of the Board of Supervisors.

Your email has been forwarded to the appropriate areas, printed, and included as Back-up to Agenda Item 16.1 for the May 23, 2017 Board Meeting.

Wishing you a pleasant day, and with warm regard,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
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-----Original Message-----

From: Margaret Lindou [mailto:margaretlindou@yahoo.com]
Sent: Monday, May 22, 2017 6:18 AM
To: COB <COB@RIVCO.ORG>
Subject: Agenda Item 16-1

Dear Riverside County Board of Supervisors,

Please consider carefully the proposal for higher density housing near Citrus Hill High School. The area near Wood Road can not handle thousands of extra cars. Sheriff and support services in the area are inadequate to keep up with higher density housing. Please keep this area of land at it's current 1 house per acre zoning level. Save higher density housing for land that is closer to freeways and multilane roads. Our neighborhoods were planned to be rural.

Thank you for your time.

Sincerely,

Margaret Lindou
18540 Malkoha St.
Perris, Ca. 92570

Agenda Item 16-1: General Plan Amendment Initiation Procedures for General Plan Amendment No 1196.

Hildebrand, John

From: Jill Stingley <jillstingley@aol.com>
Sent: Monday, May 22, 2017 8:22 AM
To: Hildebrand, John
Subject: AGENDA ITEM 16-1: GENERAL PLAN AMENDMENT INITIATION PROCEDURES FOR GENERAL PLAN AMENDMENT NO. 1196

Good morning,

I'm writing about concerns to your plans of re zoning our area out here in our rural community.

Being a realtor for years and watching the growth of our city and others like it, the one thing that I find constant is change.. just like life.

However, the change that I see happening in our rural areas is the city, and county don't seem to care about its citizens that are already living here, raised here, enjoying our quiet area away from the city day to day crap that goes on. I have watched several communities grow, changing the zoning, thus pushing the citizens that have lived and loved there OUT..

Our city, and county officials sell out their citizens for more cash to their pockets, leaving US, that live here, holding the bag, and having to deal with the new dense community gripes, headaches that these new citizens bring in.

The new citizens want affordable housing and yes new construction, then they look outside their surrounding neighborhood, complain, complain, complain. The county then gets involved in our lives only to police us into changing what we didn't need to change in the first place.. the new dense housing folks weren't here.. WE were.

The beauty of our neighborhood is our open space, our peace, quiet and tranquility. Honestly, if we wanted differently, we would relocate to city crap.. keep us rural.. we deserve that.. we paid for it..

Please don't push we the citizens of our rural community out.

Thank you

Jill Albrecht-Stingley
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Jill Albrecht-Stingley
Riverside Real Estate Professionals
BRE 01343326
(909) 241-1225

Hildebrand, John

From: Maxwell, Sue
Sent: Friday, May 19, 2017 4:54 PM
To: Young, Alisa; Perez, Juan; Hildebrand, John; Leach, Charissa; COB-Agenda; District 4 Supervisor V. Manuel Perez; District2; District3; District5; Supervisor Jeffries - 1st District
Subject: May 23, 2017 Agenda Item 16.1 - Public Opinion Opposing GPA 1196

Good afternoon,

One more Public Opinion in opposition to GPA 1196 for review.

Thank you kindly, and have a nice weekend, Sue Maxwell Board Assistant Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>

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-----Original Message-----

From: Lizzy Creek [mailto:lizzylikes2smile@hotmail.com]
Sent: Thursday, May 18, 2017 8:24 PM
To: Alvarez, David <daalvarez@RIVCO.ORG>; Maxwell, Sue <smaxwell@RIVCO.ORG>
Subject: Nuevo opposition

Hello,

I 100% oppose any efforts or actions to rezone the land off Wood Rd. in Mead Valley to high density housing. Our community and I oppose any zone changes or amendments to the General Plan. We sure hope you see us and listen to us. We need your No vote on GPA 1196.

Please work with the owner and builders to get this built as it currently is zoned for 1 acres lots. If there is a will there is a way and I am sure they can make some money building and selling 1 acre home lots. Let's get creative and make the community happy and the owners some money. Community still will get increased traffic and crowded schools and the developers will not make as much money as originally planned and hoped for. We need a compromise. There is already an approved plan for a few hundred of homes off of Wood Rd. and Lurin. Both area's built up to maximum capacity will be just too much to our already crowded streets and school traffic issues. Plus the lack of Sheriff's and fire department staffing in our community is also an issue. Please Vote NO for us.



Val Verde Unified School District

975 W Morgan Street • Perris, CA 92571 • 951-940-6100

May 4, 2017

Re: School Demographics Request

Ms. Varela,

Per your e-mail request dated March 29, 2017, the following response is provided:

Citrus Hill High School:

1. Current student population
 - A. The current student population is 1966 Regular Education Students and 148 Special Education Students for a total of 2114 students.
2. Maximum student population based on current size of school and resources.
 - A. Although the District can contractually load classrooms to 35 students, the classroom loading standard for Regular Education Students is 29.17 students X 84 rooms for a total of 2450 students.
 - B. Special Education is currently utilizing 17 classrooms.
3. Current class enrollment (or average) per core academic class
 - A. 1966 Regular Education Students using 84 rooms = 23.40 average students per room.
4. Current class enrollment hard cap per core academic class
 - A. 35 Regular Education Students per room
5. Is there a formula that establishes the anticipated number of students that may be enrolled in the school based upon the number of houses in the district? Example: If 500 additional homes were added within the CHHS boundary limits, what number of students would you anticipate to be added to the CHHS?
 - A. The District's School Facilities Needs Analysis (SFNA) is a document updated annually which establishes the fee for residential construction. This document also establishes a Student Generation Rate currently at 0.2031 high school students per Single Family Detached unit. Example: 500 houses X 0.2031 = 101.55 future students expected.
6. What if the CHHS was unable to accommodate the additional students into the campus due to campus size, hard caps? How would those students then be accommodated? Would busing to another school be a possible or likely option?
 - A. In the event we are unable to accommodate students with the current classroom count, the district would consider for example, adding portable or permanent classrooms, boundary changes to accommodate growth and student transfers to other high schools within the district.
 - B. Val Verde does not transport Regular Education Students.

BOARD OF EDUCATION:

Julio Gonzalez
Marla Kirkland
Matthew Serafin
Suzanne Stotlar
D. Shelly Yarbrough

Michael R. McCormick
Superintendent

R. Darrin Watters
Deputy Superintendent
Business Services

Mark LeNoir
Assistant Superintendent
Education Services

Juan Cabral
Assistant Superintendent
Human Resources

7. Are you aware of any proposals or expressions of interest to purchase land from the land developer to expand on the campus of CHHS? In addition, if so, would you kindly elaborate?
 - A. The district is not currently interested in any land purchase to expand CHHS. This campus has room for future classroom growth if needed.

Tomas Rivera Middle School:

1. Current student population
 - A. The current student population is 1016 Regular Education Students and 40 Special Education Students for a total of 1056 students.
2. Maximum student population based on current size of school and resources
 - A. Although the District can contractually load classrooms to 35 students, the classroom loading standard for Regular Education Students is 29.17 students per room X 39 rooms = 1059 students
 - B. Special Education is currently utilizing 6 classrooms
3. Current class enrollment (or average) per core academic class
 - A. 1016 Regular Education Students using 33 rooms = 30.79 average students per room
4. Current class enrollment hard cap per core academic class
 - A. 35 Regular Education Students per room
5. Is there a formula that establishes the anticipated number of students that may be enrolled in the school based upon the number of houses in the district? Example: If 500 additional homes were added within the TRMS boundary limits, what number of students would you anticipate to be added to the TRMS?
 - A. The District's SFNA is a document updated annually which establishes the fee for residential construction. This document also establishes a Student Generation Rate currently at 0.1797 middle school students per Single Family Detached unit. Example 500 houses X 0.1797 = 89.85 future students expected.
6. What if the TRMS was unable to accommodate the additional students into the campus due to campus size, hard caps? How would those students then be accommodated? Would busing to another school be a possible or likely option?
 - A. In the event we are unable to accommodate additional student with the current classroom count, the district would consider for example, adding portable or permanent classrooms, boundary changes to accommodate growth and student transfers to other middle schools within the district.
 - B. Val Verde does not transport Regular Education Students.

Mead Valley Elementary School:

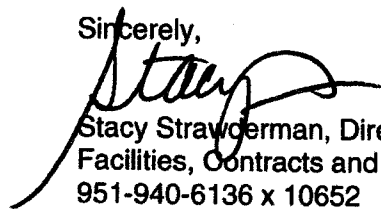
1. Current student population
 - A. 655 Regular Education Students and 10 Special ED for a total of 665 students.

2. Maximum student population based on current size of school and resources
 - A. Regular Education Students load per classroom is 30 students X 31 rooms = 930 students
 - B. Special Education is currently utilizing 2 classroom
3. Current class enrollment (or average) per core academic class
 - A. 655 Regular Education Students using 23 rooms = 28.48 average students per room
4. Current class enrollment hard cap per core academic class
 - A. 30 Regular Education Students per room
5. Is there a formula that establishes the anticipated number of students that may be enrolled in the school based upon the number of houses in the district? Example: If 500 additional homes were added within the MVES boundary limits, what number of students would you anticipate to be added to the MVES?
 - A. The District's SFNA is a document updated annually which establishes the fee for residential construction. This document also establishes a Student Generation Rate currently at 0.4570 students per Single Family Detached unit. Example 500 houses X 0.4570 = 228.50 future students expected.
6. What if the MVES was unable to accommodate the additional students into the campus due to campus size, hard caps? How would those students then be accommodated? Would busing to another school be a possible or likely option?
 - A. In the event we are unable to accommodate additional student with the current classroom count, the district would consider for example, adding portable or permanent classrooms, boundary changes to accommodate growth and student transfers to other elementary schools within the district.
 - B. Val Verde does not transport Regular Education Students.

Developers must pay school fees prior to construction; the District's current Level 2 fee is \$4.25 per square foot. The fee is used to offset the cost to provide housing for future students.

If you have any further questions, please feel free to contact me.

Sincerely,



Stacy Strawderman, Director
Facilities, Contracts and Purchasing Services
951-940-6136 x 10652
951-940-6112 fax

Dear Supervisors

May 11, 2017

My reason for writing today is to express my *opposition* to the proposed rezoning, known as GPA 1196. I imagine you see more houses = more tax money. That begs the question, would the additional tax revenue *actually pay for the additional services* these homes/people will need? Placing high density into low density will cause additional conflicts requiring more services for all the residents. Any reasonable person can see conflicts will occur.

When you put higher destiny zoning in the middle of a rural area there will be conflicts. The residents will not have horses or chickens and they will not want to see or hear them. I have seen this before in La Sierra; horse and livestock keepers get pushed out.

Essentially, what the proposal is looking to do is equivalent to putting a 5-6 story apartment building in the middle of Orangecrest. I don't believe anyone would seriously consider that. So why would you consider high density housing in a rural setting?

What is the point of having a planning department and zoning if when a developer wants to, they can change it? My understanding of zoning is to have order to the development, protect resources, maintain quality of life for residents, and promote sensible growth. This proposed change undoes that intent.

I have heard in the past that without the changes, the developers cannot make a profit. I do not see where that is my problem or that of the communities, or the Counties. People want to come to Riverside and develop. They can develop with the current zoning or not at all. Why should their profit override the community's lifestyle and peace? *Why should people who intend to sell the land have more say in that land then those of us who own the nearby land and intend to stay in the community?*

I live and work in Riverside County; this is my home. Over the years I have seen Riverside change, and not for the better. It seems that some people wish to turn us into Orange County or Los Angeles. Why? Those are terrible places with little open space and where rural communities are for the wealthy only. I say the OC- really means Only Concrete and LA means Lots of Asphalt.

Additionally, the proposed property is the only place in Riverside I have seen Jack-rabbits and the first place I have seen Lark Sparrows and Horned Larks. I believe there may be Grasshopper sparrows. I am an avid outdoors person. And I have worked as a wildlife biologist assistant.

To recap my questions are:

- 1) Does new homes tax revenue pay 100% of the services they will need? Will additional resources be added to the community, such as Sherriff, Fire and Animal services?
- 2) Would you ever consider a 5-6 story apartment complex in the middle of the Oragecrest community?
- 3) What is the point of having a General plan when developers are free to make dramatic changes to it changes that alter the character of the community?
- 4) Why do you the board of Supervisors put developer profits above resident's quality of life?
- 5) A portion of this property was at one time in an Agricultural Preserve, has the Board eliminated all the preserve areas?

These are not rhetorical questions, please answer them. Additionally, please make my letter part of the official record related to the GP amendment 1196 and the Boards answer to my five questions. Thank you for your time.

Sincerely,

Samantha Dempster

19442 Ray Avenue

Riverside, CA 92508

Hildebrand, John

From: Dr. John L. MINNELLA-Romano <drjminnella@yahoo.com>
Sent: Tuesday, May 23, 2017 6:04 AM
To: Supervisor Jeffries - 1st District; District3; District2; District 4 Supervisor V. Manuel Perez; District5; Hildebrand, John; COB
Subject: Re: May 23, 2017 Agenda Item 16:2; GPA 1198

No2Rezoning.org

www.no2rezoning.org

May 22, 2017

Riverside County Board of Supervisors
4080 Lemon Street
Riverside, CA 92501

Re: Agenda Item 16:2; GPA 1198

Dear Honorable Supervisors:

For reasons similar to our already expressed opposition to GPA 1196, we are also opposed to General Plan Amendment 1198 which is also before you on May 23, 2017.

- 1) The Foundation Component Amendment failed to be initiated during the critical and timely 2016 eight year cycle of the update to the General Plan.
- 2) GPA 1198 does not meet the requirements of an Extraordinary Foundation Component Amendment and therefore must be denied approval.
- 3) There are no new conditions for GPA 1198 as required.
- 4) GPA 1198 is clearly inconsistent and conflicts with the County's expressed and published vision.
- 5) It violates the County's Certainty Principle designed to stop leapfrog development into rural areas.
- 6) GPA 1198 is located in a solidly rural community that is not situated anywhere near a Community Development area with urban densities.
- 7) GPA 1198 would require substantial infrastructure improvements that are many years away from completion.
- 8) GPA 1198 would add to the existing dangerous conditions on Cajalco Expressway which will not being widened for years.
- 8) Toxic tailing on this project have not been addressed.

I urge you to vote no on initiation of General Plan Amendment 1198.

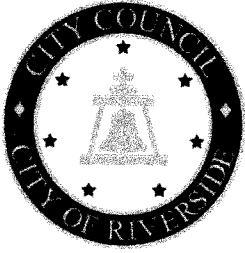
Respectfully submitted,

NO2REZONING.ORG

{signed}

John L. Minnella, BA, JD, Lic. en Der.
Chair
Member: Board of Directors, RAGLM

1820 E. 17th St., Santa Ana, CA 92705-8604
Tel. 714/543-9005
Fax: 714/542-2495
Cell: 714/574-5911
Emails: drjminnella@yahoo.com or minnellalaw@sbcglobal.net



May 22, 2017

Riverside County Board of Supervisors
4080 Lemon, 5th Floor
Riverside, CA 92501

From the Office of Councilman Paul Davis

RE: Impending County Zone Change Negatively Impacts Ward 4

Honorable Riverside County Board of Supervisors,

The issue of a new housing tract behind and around Citrus High School in the County area has been brought to my attention. After hearing both sides of the issue by the proponents and opponents and studying the impacts to the area of Ward 4 from Wood to Van Buren and surrounding areas, I have determined that the zone change being proposed would cause significant issues with both traffic, pollution, and overall significant decrease in the quality of life. The zone change, which will facilitate what was to be a low-density area, will create a very high density area would not serve neither the county, nor the city of Riverside well. No mitigations have been offered to lessen or eliminate the impacts in any way, so I urge all residents on both sides of the invisible line to join with me and Supervisor Kevin Jefferies and oppose this impending change by contacting all the remaining Supervisors and tell them to just say "NO". Keep the area as it was designed, low density rural.

If I may answer in any questions please do not hesitate to contact me anytime at: 951-453-1625 or PDavis@riversideca.gov.

Sincerely,

Councilman Paul Davis
City of Riverside – Ward 4

PD:nt

No2Rezoning.org

www.no2rezoning.org

May 22, 2017

Board of Supervisors of Riverside County
County Administration Building
4080 Lemon Street, Fifth Floor
Riverside, California 92501

Request for Placement in Official Record

Emails: district1@rcbos.org,
district2@rcbos.org,
district3@rcbos.org,
district4@rcbos.org,
district5@rcbos.org.

Re: Board Action May 23, 2017 on Agenda Item 16-1: General Plan Amendment Initiation Procedures for General Plan Amendment No. 1196.

Dear Honorable Supervisors:

The following organizations, No2rezoning.org, Residents Association of Greater Lake Mathews ("RAGLM"), Residents Association of Mead Valley ("RAMV"), and the Greater Lake Mathews Rural Trails Association ("RGLMRTA") as well as other community groups representing over 100,000 residents residing in the area known as Greater Lake Mathews and Greater Mead Valley areas are VERY STRONGLY and unitedly opposed to General Plan Amendment ("GPA") 1196 that proposes to **change the Rural Foundation Component of the General Plan from Rural Community to Community Development**, and to **amend the Land Use Designation from Very Low Density Residential to Medium Density Residential**. These proposed changes of 238.5 acres zoned rural one acre to medium and high density urban zoning threaten the rural existence of the entire area from the I-215 to the I-15 just south of the City of Riverside.

GPA 1196, a Rural Foundation Component change request:

-violates the principles of the General Plan Certainty System designed to stop leap frog development into rural areas;

-is clearly inconsistent with the Riverside County General Plan Vision, the Lake Mathews and Mead Valley Area Plans and the Lake Mathews and Mead Valley Community Plans;

-is located in a solidly rural community that is not situated anywhere near a Community Development area with urban densities;

-would require substantial infrastructure improvements including transportation, more schools, sewer and prevention of potential flooding;

- will encourage and promote further urbanization efforts; and
- promotes the financial interests of non-resident land owners at the expense of local residents' investments in their property and lifestyle.

1. The FGPA Application appears to have been filed too late and therefore is improperly before the Board.

The FGPA Application filing period began on April 4, 2016 and ended June 2, 2016. If the Applicants' application was not filed on or before June 2, 2016, it was untimely filed and cannot be considered by the Board.

It appears that the Application was filed too late. A careful review of the application available and included in the October 19, 2016 Planning Commission Agenda as item 2.10 reveals NO filing stamp thereon. In fact, the only date anywhere within that Application is a handwritten date of June 1, 2016 suggesting the conclusion that the Application was not received on or before June 2, 2016.¹

If the Application was not filed on or before June 2, 2016, it was untimely and cannot be considered by the Board.

2. Even if the Application was Timely Filed, The Amendment Application is not Proper in that it is Outside the Permitted Consideration Period.

The Foundation Component Amendment failed to be initiated during the critical and timely 2016 eight year cycle of the update to the General Plan and therefore must be denied approval.

SECTION 2.5. GENERAL PLAN FOUNDATION COMPONENT AMENDMENTS - REGULAR.

A. APPLICABILITY. This Section shall govern the processing of regular Foundation Component Amendments occurring during the Eight-Year General Plan Review Cycle including any General Plan amendment to change:

1. The Riverside County Vision;
2. The General Planning Principles set forth in General Plan Appendix B;

B. LIMITATION ON FOUNDATION COMPONENT AMENDMENTS. Except as otherwise provided in Section 2.6. and Section 2.7., **no Foundation Component Amendment shall be heard or approved except as part of the Eight-Year General**

¹ Riverside County Planning Dept. Staff Report regarding Agenda Item 2.10 (GPA 1196) for Planning Comm'n Hearing on Oct. 19, 2016, at. 486.

Plan 2008 and continue during the 2008 calendar year, and subsequent cycles shall occur at eight calendar year intervals thereafter (Ordinance 348.4840).

Emphasis added.

The Amendment Application Period began on April 4, 2016 and ended on June 2, 2016.² As indicated above, section 2.5.B of the Riverside County General Plan requires that the "...Amendment shall be heard or approved..." during the cycle calendar year. The Amendment process, assumedly begun in 2016, was not "heard or approved" during 2016. It first came before the Board of Supervisors ("the Board") for hearing on March 14, 2017 and is therefore outside of the General Plan requirements.

3. Even if the Application is Timely Before the Board, There is NO Appropriate Justification Provided for a Foundation Change from Rural to Urban Land Use for This Project Because No NEW Conditions or Circumstances Exist.

The proposed site is located within the community of Glen Valley where mixes of residential and agricultural uses enhance the rural nature of the area. The area is defined by a rustic lifestyle and a desire for larger lot sizes, such as 1, 2 and more acres. The site is vacant, as well as those to the north, northwest, and south. Some single family residences are located to the east and west.

The Staff Report of the Riverside County Planning Department prepared for and presented to the Planning Commission for consideration on October 19, 2016 of Agenda Item 2.10, citing the General Plan, reminds all of the requirement for the presentation of "...evidence demonstrating new conditions or circumstances..." "... to justify a Foundation Component Amendment".³ No acceptable "evidence" has been provided to show that new conditions or circumstances are present in the area to justify the proposed change to higher density uses despite the Staff Report's conclusion that the evidence attached to their Report amounts to "new evidence or circumstances."

The justification cited by the Staff Report refers to the existence of Citrus Hill High School ("CHHS") and the development of the Boulder Springs Specific Plan.⁴ However, these are NOT new conditions. Both existed since 2005 and were not considered new conditions when the

² Riverside County Planning Dept. 2016 Property Owner Initiated Foundation General Plan Amendment Announcement, ca. Mar. 8, 2016.

³ Riverside County General Plan, Chapter 11, Required & Optional Findings, para. 3 (Foundation Amendment Findings), Dec. 8, 2015: "a. The foundation change is based on substantial evidence that new conditions or circumstances disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan". Emphasis added.

⁴ Riverside County Planning Dept. Staff Report regarding Agenda Item 2.10 (GPA 1196) for Planning Comm'n Hearing on Oct. 19, 2016, at. 492.

Planning Department found GPA 1006 and 1016 Amendment Applications “not appropriate” in 2008.

In fact, an authorized representative for the developers/investors after repeated questions as to justification admitted that there was no “justification” at the Woodcrest MAC meeting on Thursday, May 11, 2017 with about 80 residents present that the only real reason for GPA 1196 is monetary gain because the owners and developers do not believe they can realize a sufficient profit by building one acre lot homes. That is not the type of justification required by the General Plan and Ordinance and thus the Staff Report, and the Planning Commission approval based upon the Staff Report fail.

Previous attempts to change the Rural Community Foundation (Rural Residential) to Community Development Foundation (high density urban) for this property have failed. Riverside County Planning Department staff correctly recommended that virtually the same Foundation changes “would not be appropriate” and that “substantial evidence has not been provided to show that new conditions or circumstances are present in the area to justify the proposed change to higher density uses . The Planning Department staff recommended, “that adoption of an order initiating proceedings for General Plan Amendment No. 1006 from Rural Community: Very Low Density Residential to Community Development: Medium Density Residential would not be appropriate”.⁵

4. The Certainty System Preserves Stability and Flexibility in the General Plan Over Time and is Violated by Approval of GPA 1196.

The Riverside County General Plan Certainty System provides clarity regarding the interpretation and use of the General Plan in ongoing decision making, and seeks to sustain the Plan's policy direction over time.⁶ It recognizes that circumstances will change, imperfections in the Plan will be discovered, and events will occur that require changes in the Plan. **The overriding consideration, however, is the absolute necessity to maintain a high level of confidence in the Plan and enable people affected by it to have reasonable expectations regarding how the Plan will impact them.** The Certainty System serves the needs of those who value a rural lifestyle, farmers who have invested in their operations, and developers who want to ensure return on their investments. The System also ensures that open space is preserved in the County for the benefit of all. RCIP, Chapter 1.

State law limits amendments to the General Plan to four times per year. Each one can include multiple areas of change. The Certainty System takes the state guidelines a step further by identifying specific amendment categories and a time frame within which each can be considered for amendment to the General Plan. It is essential to the integrated character of this plan that changes made to it do not create inconsistencies with other parts of the Plan. RCIP, Chapter 1.

⁵Riverside County Planning Dept. Staff Reports regarding Agenda Items 6.4 (GPA 1006) and 6.6 (GPA 1016) for Planning Comm'n Hearing on Aug. 12, 2008.

⁶ Riverside County General Plan, Chapter 11: Administration, General Plan Certainty System.

5. GPA 1196's Inconsistency With the County's Vision.

GPA 1196 is clearly inconsistent with Riverside County's vision.⁷

The Rural General Plan Foundation Component is intended to identify and preserve areas where the rural lifestyle is the desired use, including areas of remote cabins, residential estates, limited agriculture, equestrian, and animal keeping uses. In the future, the challenge will focus on preserving the character of established rural areas while accommodating future growth, preventing the encroachment of more intense urban uses, and ensuring compatibility between rural and urban uses.⁸

The proposed project site is surrounded by Rural A-1-1 and RA-1 homes on one acre. Woodcrest Estates Community is one acre rural equestrian ranch homes. Hill Top Estates (now known as Boulder Springs Summit) are also one acre rural equestrian homes. The area west of Wood and north of Markham are one acre or larger rural equestrian properties.

6. GPA 1196's Negative Impacts on the Community.

Not only does the proposed project not meet the criteria outlined in the General Plan for a Foundation Component Change and is inappropriate for the area, there are major negative issues of concern regarding traffic, infrastructure, sewer, schools, water, habitat and ecology, cultural resources, and encouragement of further urbanization of the community contrary to community wishes.

Traffic. This proposed project will bring an additional 10,000 vehicle trips per day onto already overburdened and gridlocked streets surrounding two high schools on Wood Road. Avenues "C" and "D" will connect to Cable Lane which is the only exit out of Woodcrest Estates a quiet rural equestrian neighborhood with one acre lots. Residents will no longer be able to get out of their driveways along Markham Road, Cable Lane, "C" Street and Wood Road most of the day. A long line of cars will be trying to access Markham Street at Cable Lane at the four way stop. No Traffic Signals are proposed at Cable Lane, Cole, Parsons Street, "B" and "C" streets. Massive traffic congestion already exists and 10,000 additional vehicles trips per day will increase this congestion substantially for the entire area. Even if traffic signals are installed the amount of traffic flow will still create gridlock on roads surrounding this proposed project.

Inappropriate Roads. The only road improvements proposed are the addition of one lane along Wood Road from "C" to "D" streets and the addition of one additional lane along Markham to the end of the project boundaries. The other side of these roads will continue to be one lane, narrow, hilly, rural and dangerous roads for residents intent on moving quickly. The Transportation Department currently has a road sign posted that states, "Hill Blocks View - 35 mph" a few hundred feet north of "C" Street on Wood Road. Wood Road sits on top of a hill

⁷ Riverside County General Plan, Chapter 2: Vision Statement.

⁸ Riverside County General Plan, Chapter 3: Land Use Element.

with steep embankments on the west side of the road. Wood Road has a steep grade and vehicles are going 60-70 mph down that hill just before the signal light leading into Citrus Hill High School. A number of homes would need to be removed along Wood Road to widen this thoroughfare into four lanes. The expense of widening surrounding roads such as Markham, Wood and Cajalco are not possible at this time with the limited funding available in the County budget. The developer is not willing to make necessary infrastructure improvements such as signal lights at Cable Lane, Parsons Road, Cole, "C" and "B" streets. Markham and Wood Roads will need to be widened to 4 lanes from Alexander to Wood Road and Wood Road from Krameria to Cajalco Road. Adding 10,000 more vehicle trips per day will increase the dangers to our children going to school and residents commuting to work dramatically for the entire area. There are two high schools on Wood Road. Van Buren is already at capacity and gridlocked a good portion of the day. Cajalco Road is another road that is gridlocked most of the day.

Water Unavailability and Contamination. Water is yet another issue of concern. There are a number of blue line streams throughout the project area. A protected arroyo exists north of "C" Street. Water from this arroyo travels into Mockingbird Creek increasing flooding hazards for Mockingbird Canyon and Mockingbird Dam. It was not that many years ago that Mockingbird Creek overflowed its banks and took out Mockingbird Canyon Road costing Riverside County millions of dollars to repair. The other blue line streams flow into Cajalco Creek that empties into Lake Mathews which serves as drinking water for millions of residents.

Cultural Resources Endangerment. Environmental Assessment 39832 for Tentative Tract Map No. 32822⁹ approved in 2006 clearly describes several intact cultural sites are present on the proposed project site. EA 39832 was created over 11 years ago and there have been a number of changes to state law since then increasing protection of impacted cultural sites.

On September 25, 2014, Governor Brown signed Assembly Bill No. 52¹⁰, which creates a new category of environmental resources that must be considered under the California Environmental Quality Act ("CEQA"): "tribal cultural resources." The legislation imposes new requirements for consultation regarding projects that may affect a tribal cultural resource, includes a broad definition of what may be considered to be a tribal cultural resource, and includes a list of recommended mitigation measures.¹¹

AB 52 adds tribal cultural resources to the categories of cultural resources in CEQA, which had formerly been limited to historic, archaeological, and paleontological resources. "Tribal cultural resources" are defined as either (1) "sites, features, places cultural landscapes, sacred places and objects with cultural value to a California Native American tribe" that are included in the state register of historical resources or a local register of historical resources, or that are determined to be eligible for inclusion in the state register; or (2) resources determined by the lead agency, in

⁹ Riverside County Planning Dept. Environmental Assessment Form: Initial Study dated Aug. 15, 2006, pp. 10-12.

¹⁰ Calif. Public Resources Code, sec. Section 5097.94, and other minor sections.

¹¹California Land Use and Development Law Report.

its discretion, to be significant based on the criteria for listing in the state register. Calif. Land Use and Development Law Report.

Under AB 52, a project that may cause a substantial adverse change in the significance of a tribal cultural resource is defined as a project that may have a significant effect on the environment. Where a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document must discuss the impact and whether feasible alternatives or mitigation measures could avoid or substantially lessen the impact. Calif. Land Use and Development Law Report.

Tentative Track Map No. 32822 is a 103 acre portion of the project site. The rest of the 238.5 acres of GPA 1196 project have yet to be reviewed and could quite possibly contain a number of other tribal cultural resources. The Cajalco Creek area is a prime location for cultural sites of historic importance and at one time was a location for one of the largest Native American villages in the area. Much of the project site was orange groves, but there are vast amounts of the property that was left vacant.

Inadequate Schools. Schools have not been evaluated for this project. Val Verde elementary and middle schools in Mead Valley are already at capacity. The Val Verde Unified School District is spending the remainder of their bond funds on a new high school being built in Perris. There is no funding available to build any new schools and it is unlikely that voters will approve another bond measure. Changing from rural one acre zoning to urban 5 homes per acre will require increasing class sizes or possibly adding portable classrooms. The difference between 238 rural homes being built compared to 1190 high-density homes would result in 5200 additional children attending Mead Valley Schools immediately as well as encourage more development with the consequent school needs.

Wildlife and Wildlife Habitat Endangerment. Wildlife and wildlife habitat have not been adequately evaluated. At least some if not all of the project site is part of the Woodcrest Agricultural Reserve and at one time was filled with orange groves. Quite a few years have passed since these trees were removed and wildlife habitat and wildlife are now present in abundance on and in the vacant land. Burrowing owls, hawks, black tailed jackrabbits, roadrunners, song birds, K-rats and even mountain lions have been observed on the project site.

Burrowing owls are dying at alarming numbers as their habitat is being destroyed in Western Riverside County. Borrowing owls will soon become extinct in Western Riverside County as their habitat is being destroyed that they require to exist. Relocation of these owls has not been very successful. Riverside County has been a leader in the preservation of open space for habitat so that endangered and threatened animals and plants can survive. Burrowing owls are thriving on this property at record numbers.

Inadequate Sewer Services. The current sewer system provided by Western Municipal Water District is already at capacity. Changing the Rural Foundation Component of the General Plan from Rural Community to Community Development and to amend the Land Use Designation from Very Low Density Residential to Medium Density Residential will require a new sewer line and infrastructure upgrades.

Danger for Low Income Retired & Immigrant Residents of Mead Valley. The impact of GPA 1196 approval on the existing communities of Greater Mead Valley which I believe are largely low income retired people and former immigrants originally from Mexico and Guatemala should be a major concern for the Board. They will suffer by decreasing property values, diminished open space, and further rezoning encouraged by GPA 1196 approval. They moved to this area because it was inexpensive, with large properties, peaceful, animal friendly, less regulated, and welcoming. They do not deserve this abandonment of government protection of their communities and they lack the resources and ability to flee.

I urge you to vote NO on GPA 1196.

- A) The Foundation Component Amendment failed to be filed by the deadline established.
- B) The Foundation Component Amendment failed to be initiated during the critical and timely 2016 eight year cycle of the update to the General Plan.
- C) GPA 1196 does not meet the requirements of an Extraordinary Foundation Component Amendment and therefore must be denied approval.
- D) GPA 1196 is clearly inconsistent with the County's vision.
- E) GPA 1196 violates the Certainty Principle designed to stop leap frog development into rural areas.
- F) GPA 1196 is located in a solidly rural community that is not situated anywhere near a Community Development area with urban densities.
- G) Substantial and very costly infrastructure improvements would be required including transportation, sewer system infrastructure and major flooding prevention, additional schools, protection of endangered habitat, and protection of cultural resources.
- H) GPA 1198 needlessly and unwarrantedly promotes the financial interests of non-resident land owners at the expense of the local residents' investments in their property and lifestyle.

The population of the affected and adjacent communities unanimously demand rejection of GPA 1196 and similar efforts to rezone. Not one resident of the area has expressed support for this amendment. Your constituents deserve and require your protection against yet another unnecessary, unwanted, and unjustified incursion into their community. The supervisor who knows this district and the affected area has asked that you join him in denying approval and his recommendation show be respected and followed.

Respectfully submitted,

No2Rezoning.org

[signed]

John L. Minnella, BA, JD, Lic. en Der.
Chair
RAGLM Board Member

1820 E. 17th St.
Santa Ana, CA 92705-8604
drjminnella@yahoo.com
minnellalaw@sbcglobal.net

Maxwell, Sue

From: Maxwell, Sue
Sent: Monday, May 22, 2017 9:53 AM
To: 'drjminnella@yahoo.com'
Cc: Hildebrand, John; COB-Agenda (COB-Agenda@rivco.org)
Subject: Public Comment - Opposition to GPA 1196 (May 23, 2017 Item No 16.1, MT No 3713)
Attachments: Walsh Version, 5-21-17 JLM version #1.docx

Tracking:	Recipient	Read
	'drjminnella@yahoo.com'	
	Hildebrand, John	
	COB-Agenda (COB-Agenda@rivco.org)	
	Perez, Juan (JCPEREZ@RIVCO.ORG)	Read: 5/22/2017 9:54 AM
	Leach, Charissa	Read: 5/22/2017 10:19 AM
	Young, Alisa	
	District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG)	
	District2	
	District3	
	District5	
	Supervisor Jeffries - 1st District (district1@rivco.org)	
	Maunz-McLellan, Claudia	Read: 5/22/2017 9:57 AM
	Fuller, Ashley	Read: 5/22/2017 9:57 AM

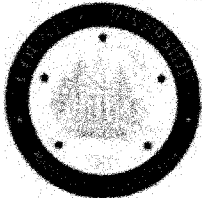
Good morning Dr. Minnella-Romano,

Your email and attachment were received by the Clerk of the Board of Supervisors and forwarded to the appropriate areas for review. Both have been printed and attached as Back-up to Agenda Item No 16.1 for the May 23, 2017 Board Meeting.

Thank you kindly, and have a pleasant day,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>



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From: Dr. John L. MINNELLA-Romano [mailto:drjminnella@yahoo.com]
Sent: Monday, May 22, 2017 8:25 AM
To: Hildebrand, John <JHildebr@RIVCO.ORG>; COB <COB@RIVCO.ORG>
Subject: Re: BOS Hearing May 23, 2017 Regarding GPA 1196

Please ensure that the attached letter to each of the Supervisors is presented to them today for consideration at their meeting tomorrow, May 23, 2017; and that the letter is made a part of the GPA 1196 consideration proceedings and records.

Sincerely,

J.L. MINNELLA AND ASSOCIATES/
MINNELLA ROMANO AND ASSOCIATES

[signed] Dr. John L. Minnella

California, USA address: 1820 East 17th Street, Santa Ana, California 92705-8604. Telephone: 714/543-9005; Facsimile: 714/542-2495. Email: drjminnella@yahoo.com or minnellalaw@sbcglobal.net. Affiliated offices also in: Miami, Florida, USA; Managua, NICARAGUA (Headquarters); Port Harcourt, NIGERIA; and Phnom Penh, CAMBODIA. Website: www.minnellalaw.com.

Maxwell, Sue

From: Maxwell, Sue
Sent: Monday, May 22, 2017 10:48 AM
To: 'Laurie Sabo'; Supervisor Jeffries - 1st District; Hildebrand, John
Subject: Public Comment - Opposing GPA 1196 (May 223, 2017 Item No 16.1, MT No 3713)_Sabo

Tracking:

Recipient	Read
'Laurie Sabo'	
Supervisor Jeffries - 1st District	
Hildebrand, John	
COB-Agenda (COB-Agenda@rivco.org)	
Juan Perez - TLMA (JCPEREZ@rctima.org)	
Leach, Charissa	Read: 5/22/2017 10:55 AM
Young, Alisa	
District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG)	
District2	
District3	
District5	
Supervisor Jeffries - 1st District (district1@rivco.org)	
Fuller, Ashley	Read: 5/22/2017 10:53 AM
Perez, Juan	Read: 5/22/2017 10:53 AM

Good morning Ms. Sabo,

The Clerk of the Board of Supervisors received a copy of your email to Supervisor Jeffries and John Hildebrand in opposition to General Plan Amendment 1196.

Your email is being distributed to the appropriate areas, and printed and included as Back-up to Agenda Item 16.1 for the May 23, 2017 Board Meeting.

Wishing you a pleasant day, and with warm regard,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
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responsible for delivering this communication to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by reply email or by telephone and immediately delete this communication and all its attachments.

From: Laurie Sabo [mailto:laurlee44@gmail.com]

Sent: Monday, May 22, 2017 10:14 AM

To: Supervisor Jeffries - 1st District <district1@RIVCO.ORG>; Hildebrand, John <JHildebr@RIVCO.ORG>; COB <COB@RIVCO.ORG>

Subject: ITEM 16-1: GENERAL PLAN AMENDMENT NO. 1196

To: Riverside County Board Of Supervisors, Clerk of The Board and Project Planner John Hildebrand

Re: ITEM 16-1: GENERAL PLAN AMENDMENT NO. 1196, May 23, 2017 Hearing

Dear members of The Board,

I, Laurie Sabo, am a property owner, tax payer, and voter and live adjacent to the property mentioned in GPA 1196 and I am opposed to any change in that property being rezoned. The application request is not a suitable density for this area.

The county plan foundation defines our area as rural. Our lifestyle involves open space, space between our neighbors, equestrian property and trails. We purchased our home in this specific area due to larger lot sizes. People pay more to purchase homes and property in this area because as time goes on, these rural properties are more scarce. There are plenty of other places to live with medium to high density urban housing. Our county is unique in its offering of a rural lifestyle. It is our heritage to protect these rural communities.

This community can not afford urban housing due to cut backs within County Sheriff's Department, Code Enforcement and Cal Fire. The elementary schools and middle schools are nearly at capacity. The roads surrounding the property are very dangerous as they are congested and only one lane in each direction. There are not even sidewalks for our children to get to school except directly around school property. Improving these roads would require eminent domain.

Let us not forget to protect our open spaces and the 11 endemic species in this area. The burrowing owl is a California Species of Special Concern (SSC) and is protected by the Migratory Bird Treaty Act (MBTA). Additionally, the Project area is within the MSHCP survey area for burrowing owl. The Stephens' Kangaroo Rat has been observed in the project area. Two Sensitive wildlife species are known to live in areas nearby; San Diego black-tailed jackrabbit and golden eagle (*Aquila chrysaetos*). Both are listed as a state SSC by CDFW, and are a "covered species" under the MSHCP. Riverside fairy shrimp [*Streptocephalus wootoni*] have also been sighted during our recent rains where water had collected.

As you are aware, residents and community organizations such as RAGLM, GLMRTA, Woodcrest MAC and Paul Davis of Riverside, are opposed and have done so publicly.

As County Supervisors you are stewards of the county and for the well being of the general public we ask you to support our opposition on May 23, 2017.

Please include this letter to be part of public record. Thank You.

Sincerely,

Laurie Sabo

Maxwell, Sue

From: Maxwell, Sue
Sent: Monday, May 22, 2017 1:40 PM
To: 'Varela, Nancy(PSH)@DSH'; COB
Subject: RE: Letters opposing GPA 1196 BOS Mtg. Item 16-1

Good afternoon Ms. Varela,

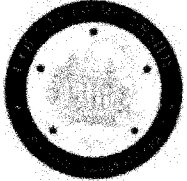
The Clerk of the Board of Supervisors received your two letters opposing GPA 1196 and forwarded to the appropriate areas.

Both letters have been printed and added as Back-Up to Agenda Item No 16.1 for the May 23, 2017 Board Meeting.

With thanks and warm regard,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>



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-----Original Message-----

From: Varela, Nancy(PSH)@DSH [mailto:NANCY.VARELA@dsh.ca.gov]
Sent: Monday, May 22, 2017 1:11 PM
To: COB <COB@RIVCO.ORG>
Subject: Letters opposing GPA 1196 BOS Mtg. Item 16-1

Kindly provide these letters to the 5 County Supervisors. These letters are in opposition to GPA 1196, Item 16-1, for discussion at tomorrow's Board of Supervisors' Meeting.

Thank you,

Nancy Varela
Nvarela29@yahoo.com

3713
5/23/17 16.1
2017-5-135891

May 22, 2017

Riverside County Board of Supervisors

Clerks of the Board and Project Planner John Hildebrand

RE: Item 16-1: General Plan Amendment No. 1196, May 23, 2017 Hearing

Dear Members of the Board:

I, Ray Varela, property owner on Avenue C, live directly across the proposed planned development which is the subject of GPA 1196. I am writing to inform you that I am adamantly opposed to this development. The application request is not suitable density for this area. Furthermore, it will negatively impact the established rural neighborhoods that surround this development.

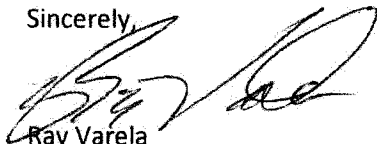
Our county plan foundation defines our area as rural. People that purchased properties in this area did so with this knowledge. Riverside County is comprised of numerous areas of different zoning, such as very high density, high density, low density, etc. What makes our County so unique is that Riverside County residents can move within the county to meet their family's needs. My family and I moved from a home on a 7,200 foot lot home several years ago to our current home on a 1.2 acre lot in order to now live a rural lifestyle.

I grew up in Norco, California in an established rural community. When I married and established my family, we first moved to Moreno Valley, then Riverside, then to our current home in unincorporated Riverside. Mine and my wife's dream is to have horses, goats and chickens on our property. Our children are preparing to move out and begin their own adult lives. We plan on building a casita so that my daughter will be able to stay on our property, and my grandchildren can experience what I did as a child. Rural living is hard to find, but the benefits are incredible. This must be true because homes on 1-acre properties in this area are hard to find and don't stay on the market for very long.

This new development with 7,200 square foot lots is being developed to be built across the street from my house. Our dreams of rural living are vanishing. Foreign land owners that have no interest at all in doing what is right for Riverside and for the thousands of rural homeowners have managed to put our lives in their hands.

Honorable Supervisors, I ask you, Who benefits from this rezoning? It is certainly not the rural community of Unincorporated Riverside!

Sincerely,



Ray Varela

19031 Avenue C

Perris, CA 92570

May 22, 2017

Riverside County Board of Supervisors

Clerks of the Board and Project Planner John Hildebrand

RE: Item 16-1: General Plan Amendment No. 1196, May 23, 2017 Hearing

Dear Members of the Board:

I, Nancy Varela, property owner on Avenue C, live directly across the proposed planned development which is the subject of GPA 1196. I am writing to inform you that I am adamantly opposed to this development. The application request is not suitable density for this area. Furthermore, it will negatively impact the established rural neighborhoods that surround this development.

Our county plan foundation defines our area as rural. People that purchased properties in this area did so with this knowledge. Riverside County is comprised of numerous areas of different zoning, such as very high density, high density, low density, etc. What makes our County so unique is that Riverside County residents can move within the county to meet their family's needs. My family and I moved from a home on a 7,200 foot lot home several years ago to our current home on a 1.2 acre lot in order to now live a rural lifestyle.

I wake up every morning to roosters crowing from my neighbors' homes, and horses neighing. We watch the jack rabbits hopping along our property and have even had to chase away a few coyotes. We are planning to build a casita on our property so that my soon to be married daughter can begin her new married life with her husband.

The promise of what we believed when we moved here is now seriously in jeopardy if the foreign landowners are able to rezone the 238 acres that surround our home and our rural neighbors into lots as little as 7,200 square feet. The landowners have an absolute right to develop their property, but should do so based upon its current zoning.

Honorable Supervisors, I ask you, Who benefits from this rezoning? It is certainly not the rural community of Unincorporated Riverside!

Sincerely,



Nancy Varela

19031 Avenue C
Perris CA 92570

Johnson, Smith & Foy

ATTORNEYS at LAW

P.O. Box 1029, Temecula, CA 92593

Abigail A. Smith, Esq.
Kimberly Foy, Esq.

Abby@SoCalCEQA.com
Kim@SoCalCEQA.com
Telephone: (951) 506-9925
Fax: (951) 506-9975

May 22, 2017

VIA Email Only

Board of Supervisors
c/o Kecia Harper-Ihem
Clerk of the Board
County of Riverside
4080 Lemon Street, 1st Floor
Riverside, CA 92501
cob@rivco.org
cob@rcbos.org

John Hildebrand III
P.O. Box 1409
Riverside, CA 92502-1409
jhildebr@rctlma.org

RE: ITEM 16.1- OPPOSITION TO INITIATION OF GENERAL PLAN AMENDMENT NO. 1196- PROPOSED FOUNDATION CHANGE FROM RURAL COMMUNITY (RC) TO COMMUNITY DEVELOPMENT (CD)

Greetings:

On behalf of concerned area residents and No2Rezoning.org, please consider these comments in opposition to the proposed initiation of General Plan Amendment ("GPA") No. 1196. GPA 1196 proposes to amend the General Plan Foundation Component a 238.5 gross acre site in the Cajalco Wood policy area from Rural Community (RC) to Community Development and to amend the site's land use designation from Very Low Density Residential (VLDR) to Low Density Residential (LDR) and Medium Density Residential (MDR).

The County must decline to initiate GPA 1196. Foremost, GPA 1196 can no longer be initiated under the Regular Foundation Component Amendment provisions of the Riverside County Zoning Ordinance as the eight- year cycle for such amendment has closed. While a project need not be approved during the eight-year cycle, the vote to initiate the amendment must be made during that calendar year- here 2016. (Ord. 348.4840 Section 2.5 B, C, F.) It was not.

No evidence supports an Extraordinary Foundation Component Amendment for this proposed project. The burden is on the applicant to affirmatively establish such substantial evidence exists as necessary to support the required facts and findings. The proposal before you lacks compelling merit and fails to show any significant changes in circumstances or other extraordinary circumstances justify review.

3713
5/23/17 16.1
2017-5-135899

Furthermore, the County should decline to initiate GPA 1196 as the proposed land use density is not in keeping with the surrounding rural, agricultural community. Various adverse impacts would also result from the proposed piecemeal urbanization, including traffic impacts from limited vehicle capacity on surrounding roadways; noise and safety impacts from increased vehicle trip generation and conflicting land uses; impacts to biological resources from increased site usage including in sensitive areas; etc. For each of these reasons, and as detailed herein, we strongly implore the Board to decline to initiate GPA 1196.

I. FINDINGS FOR AN EXTRAORDINARY FOUNDATION COMPONENT GENERAL PLAN AMENDMENT CANNOT BE MADE

To ensure constancy in the General Plan, the Zoning Ordinance (Ord. No. 348.4840) Section 2.5 provides that no Foundation Component Amendment shall be heard or approved except as initiated during an Eight- Year General Plan Review Cycle. The Board can adopt an order initiating amendment proceedings at any time during the calendar year of the eight- year cycle, but cannot thereafter initiate proceedings. For an amendment initiated during the eight-year cycle can be processed, heard, and decided anytime.

The close of 2016 saw the close of any opportunity to initiate Regular Foundation Component Amendments. The time to initiation this proposed Foundation Component Amendment under the Regular amendment proceedings, and with regular findings, has thus expired.

To prevent a regulatory taking and address limited other extraordinary circumstances, however, the Zoning Ordinance does provide the rare opportunity for a few specifically delineated Extraordinary Foundation Component Amendments. Specifically, to approve an Extraordinary Foundation Component Amendment, the County must first find *both* of the following:

1. The foundation change is based on substantial evidence that new conditions or circumstances disclosed during the review process justify modifying the General Plan, that the modifications do not conflict with the overall Riverside County Vision, and that they would not create an internal inconsistency among the elements of the General Plan. The foregoing requirement for findings shall not apply to any amendment to the Riverside County Vision.
2. A condition exists or an event has occurred that is unusually compelling and can only be rectified by making changes in the current Riverside County Vision, General Planning Principles set forth in General Plan Appendix B, or Foundation Component.

In addition to finding substantial evidence supports these two mandatory findings, the County must also second find at least one of the following exceptional circumstances exists:

3. An unconstitutional taking of property might occur without the amendment, and the amendment alters the General Plan Foundation Component only to the extent necessary to avoid the potential taking.

4. A natural or man-made disaster or public emergency has occurred that warrants a change in General Plan Foundation Component designations in order to protect the public health, safety or welfare.
5. A Foundation Component Amendment is required to conform to changes in State or Federal law, or applicable findings of a court of law.
6. An amendment is required to comply with an update of the Housing Element or change in State Housing Element law.
7. A Foundation Component Amendment is required to significantly expand basic structural employment (such as industrial, agricultural processing, and research and development), excluding retail, service commercial, warehousing, and residential uses not ancillary to the primary employment use.
8. A Foundation Component change is necessary to facilitate implementation of open space or transportation corridor designations arising from the adopted MSHCP or Community Environmental Transportation Acceptability Program (CETAP) programs that could not be accomplished by a lesser change in the General Plan. (Zoning Ordinance § 2.6)

Private applications to initiate amendment proceedings under these provisions must be made to the Planning Director and comments of the Planning Commission requested. (Zoning Ordinance § 2.6 (D).)

After the conclusion of the 2016 eight-year cycle, the applicant for this GPA should have been required to resubmit an application to initiate this extraordinary amendment proceeding, and obtain the input of the Planning Director and Planning Commission. It is not clear this has been done.

Moreover, none of the limited extraordinary circumstances exists here to justify modifying the General Plan to allow a greater density of housing in this rural area. Mere profit seeking is not justification for an extraordinary Foundation Component Amendment.

A. No New Conditions or Circumstances Exist to Justify the Proposed Modification

The justification for GPA 1196 states, regarding new conditions or circumstances, that the Boulder Springs Specific Plan and Citrus Hills High School have been developed and are denser than the current designation of the site. Neither of these developments constitutes a “new” condition or circumstance. The Boulder Springs Specific Plan was amended in 1988 and again in 2007, clearly not a “new” circumstance now 10 years later.

The Citrus Hills High School opened in 2005, again not a “new” circumstance. In fact, subsequent to the High School opening, proposed regular foundation component amendments have twice been sought for the site. The first round of proposed amendments were previously abandoned upon receiving staff comments they were “not appropriate” when they sought changes to CD: LDR, a lesser density than the currently proposed CD: LDR and CD: MDR. And

then, again, the GPA was re-applied for in 2016 at this proposed density but failed to obtain a vote in favor of initiation in the initiating year.

None of the surrounding developments constitute “new conditions or circumstances” which justify modifying the General Plan where they have existed since the prior General Plan and/or through several regular eight- year foundation component cycles.

Moreover, to the extent the applicant argues the Citrus Hills High School for some reason “needs more clustered development” around the school, the argument is illogical and absurd. The school was developed in 2005 to accommodate the community—the community should not, over 10 years later, be modified to allegedly “accommodate” the school. This circular logic used to rationalize urban sprawl must not be endorsed.

Furthermore, the project as proposed is not “clustered” development. Clustering locates development in only limited areas, at a greater density than otherwise allowed, in order to preserve the remainder of a site in open space or natural habitat. Simply seeking to develop denser than permitted on a portion of the site, *without* preserving the remainder of the site, *is not clustering* development. Clustering thus does not justify modifying the General Plan, but particularly where no new conditions or new circumstances exist.

B. The Modifications Conflict with the Overall Riverside County Vision

The proposed GPA 1196 conflicts with the overall Riverside County Vision. The Riverside County Vision, as summarized, is, “Riverside County is a family of special communities in a remarkable environmental setting.” (General Plan p. V-3) To accomplish this overall vision, the RCIP vision seeks to:

- reflect new growth patterns that no longer reflect a pattern of random sprawl (General Plan p. V-12);
- focus growth near transit stations (p. V-13);
- accommodate rural living in areas committed to that lifestyle (p. V-13);
- sustain rural communities through open space and urban development commitments elsewhere (V-13);
- develop only where adequate public facilities and services are available (V-14);
- develop housing in accordance with the RCIP (V-14);
- strategize housing with improvements to the transportation system (V-15);
- reduce vehicle trips through a land use/ transportation connection compared to earlier patterns of development (V-15);
- communities “focused around existing urban areas with transit opportunities” (V-16);
- develop hubs of complete, compact and transit oriented communities (V-16);
- preserve open spaces, watercourses, and natural streams (V-17 to -18)
- reduce air pollutants through land use strategies reducing commute times and related motor vehicle pollutants (V-18)

The proposed GPA 1196 is inconsistent with the overall vision and these guiding principles. GPA 1196 instead encourages urban sprawl into a rural area not focused around transit facilities; and fails to preserve this unique community committed to a rural lifestyle.

The Rural Community Foundation Component designation applicable to this site was adopted to preserve a rural lifestyle in this area. As stated in the General Plan:

“The Rural Community Foundation Component is intended to identify communities and neighborhoods having a rural lifestyle, where animal - keeping uses and limited infrastructure (compared with Community Development areas) are prevalent. Rural Community areas will serve as transition areas between Community Development and Rural Foundation Components. Small-scale commercial activities, such as local grocery stores, gift shops and drug stores, located outside urban boundaries are needed to serve these rural communities. Small- scale incidental commercial uses are allowed. Agriculture is permitted in these areas.” (General Plan p. LU-49)

Development within areas designated RC should not adversely impact the open space and rural character of the surrounding area. (General Plan p. LU-51)

The RC: VLDR designation applicable to the site:

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

The RC foundation component also allows low density residential; which likewise encourages animal keeping and permits development but has a higher allowable density, ranging from 2 dwelling units per acre to 1 dwelling unit per acre. (General Plan p. LU-50)

GPA 1196 flouts these goals of retaining this area in rural development, and instead proposes to extend the CD component into this area. This extension is inappropriate. CD is intended to depict “areas where urban and suburban development is appropriate” in a pattern “adaptive to transit” that “reduces sprawl.” (General Plan p. LU-55) Yet the site is RC-VLDR land located amidst RC-VLDR, Rural Residential (RR), and RC-LDR land; not amid or adjacent to any land designated for, or developed as, CD, urban, or suburban development. It is impossible to perceive the proposed project doing anything but increasing sprawl into a rural area.

Yet the applicant claims the project will complement surrounding uses and existing communities. This proposed finding is unsupported where surrounding designations are *not* CD, and where the CD designations conflict with the RC rural uses on- and off-site, including

expecting and encouraging animal keeping, agriculture (include the existing Woodcrest 5 Agricultural Preserve onsite), and small scale commercial uses. The mandatory finding that the proposed GPA 1196 is consistent with the Riverside County Vision cannot be made based on these facts before the Board.

C. No Condition Exists or Event Has Occurred that is Unusually Compelling and can Only Be Rectified by Making Changes in the Current Foundation Component

As discussed above, no new conditions or events *at all* have occurred with respect to the area or the site, let alone one that is “unusually compelling” or “can only be rectified by making changes in the current foundation component.” A mere preference to develop the site at a greater density than currently planned and permitted is insufficient justification for an Extraordinary Foundation Component Amendment.

Notably, the applicant could seek a GPA to develop denser than currently permitted without a Foundation Component Amendment. The applicant could seek an amendment from RC: VLDR to RC: LDR, i.e., still comply with the RC Foundation Component; and be able to develop up to double to the current designation while encouraging equestrian and other animal-keeping uses consistent with the rural nature of the community. A change to the Foundation Component is unnecessary and certainly not predicated by a new “unusually compelling” condition or event.

D. None of the Other Required Extraordinary Circumstances has Occurred Requiring a Foundation Component Amendment

As discussed above, to obtain an extraordinary Foundation Component amendment, one of the following must apply:

3. An unconstitutional taking of property might occur without the amendment, and the amendment alters the General Plan Foundation Component only to the extent necessary to avoid the potential taking.
4. A natural or man-made disaster or public emergency has occurred that warrants a change in General Plan Foundation Component designations in order to protect the public health, safety or welfare.
5. A Foundation Component Amendment is required to conform to changes in State or Federal law, or applicable findings of a court of law.
6. An amendment is required to comply with an update of the Housing Element or change in State Housing Element law.
7. A Foundation Component Amendment is required to significantly expand basic structural employment (such as industrial, agricultural processing, and research and development), excluding retail, service commercial, warehousing, and residential uses not ancillary to the primary employment use.
8. A Foundation Component change is necessary to facilitate implementation of open space or transportation corridor designations arising from the adopted MSHCP or Community Environmental Transportation Acceptability Program (CETAP)

programs that could not be accomplished by a lesser change in the General Plan.
(Zoning Ordinance § 2.6)

None of these unique situations has been shown to have occurred here. Consequently, GPA 1196 cannot be initiated. Mere preference or profitability is insufficient justification for a Foundation Component Amendment.

II. GPA 1196 SHOULD NOT BE INITIATED BECAUSE IT WILL RESULT IN SIGNIFICANT ADVERSE ENVIRONMENTAL AND COMMUNITY IMPACTS.

In addition to failing to meet the requirements of the Zoning Ordinance for a Foundation Component Amendment; the County should decline to initiate GPA 1196 as it would result in significant adverse effects to the environment and community.

A. Aesthetics

Developing at a higher density than currently allowed at the site will introduce a new source of substantial light and glare from residences and vehicles. This could impact nighttime views as well as adversely affect biological resources in the area.

B. Agricultural Resources

The site contains farmland designated: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and land included in the Woodcrest 5 agricultural preserve (Project APNs 321-090-007, -026, and -052). GPA 1196 proposes to convert this significant agricultural land to a non-agricultural use via the change in designation to CR. Significant adverse impacts to agricultural resources are likely to result from this direct farmland conversion.

Moreover, by proposing suburban development in this rural area, secondary conflicts with existing agricultural uses are likely to result. For instance, hazard impacts may result from introducing additional residents and vehicles amidst farm equipment. Increased development pressure on rural and agricultural uses is also likely from the proposed suburbanization of the site. The Board can avoid these adverse effects by declining to initiate this proposed GPA.

C. Air Quality

GPA 1196, by proposing to develop contrary to the General Plan provisions adopted to reduce air pollutant emissions by developing nearby transit and amenities, would significantly increase vehicle pollutant emissions and GHGs. In other words, the proposal would increase vehicle miles travelled, adding to transportation emissions and GHGs. GPA 1196 also proposes to substantially increase traffic in this area, again adding to mobile source air pollutant emissions that would not occur with smart development in existing urban and suburban areas.

///

D. Biological Resources

The site is located nearby to an 180-acre area which warrants conservation under the MSHCP. The site also contains an arroyo and potential other biological resources, such as burrowing owls, that would be adversely impacted by the density proposed in this development. Furthermore, since converting from active agricultural use, much of the site has reverted to a more natural state containing additional biological resources since environmental assessments were previously prepared.

GPA 1196 would cause adverse impacts to biological resources directly through grading and developing more land to accommodate denser uses; introducing additional residents and their pets moving to the site; introducing additional lighting to the site; etc. Increased noise, traffic, and other operational characteristics of suburban residential development could also adversely affect biological resources onsite and in the area.

E. Cultural Resources

Cultural resources are known to occur on the site, and are likely to occur on site and in the project vicinity. Introducing a larger/ denser development footprint and additional persons in proximity to important cultural resources would create a new or more severe adverse impact compared to the current land use designations.

The area is also one of paleontological sensitivity. Denser housing, and the services and amenities needed to service that housing (i.e. water, sewer, etc.) would have a potentially significant impact, and greater impact, on paleontological resources compared to current land use designations. This additional impact can be avoided by declining to initiate this GPA.

F. Land Use/ Planning

As discussed above, GPA 1196 will have adverse impacts to land use and planning where the land use proposed utterly fails to comply with the General Plan and Zoning Ordinance. The proposal would result in an incompatible pattern of piecemeal development averse to true community planning. Moreover, the proposed development misses the mark in claiming to "cluster" development in conformity with the General Plan where it, in fact, just seeks to permit higher density development across the site.

G. Noise

The introduction of substantially greater numbers of residents into this rural area would generate noise levels far in excess of existing levels. In addition to construction noise effects, air conditioner noise and traffic noise is likely to be well above ambient levels currently enjoyed in this rural community. In fact, the General Plan recognizes that mobile noise sources may be the

most annoying noise producers in the community. (See, General Plan Noise Element) Loud suburban noise from people and vehicles in proximity to equestrian uses may also result in adverse impacts to public safety.

H. Recreation

Recreation and trails may be adversely effected by the conversion to suburban uses, particularly in the middle of this rural, equestrian area. Community trails and dedications would be essential to ensuring the rural community recreational facilities, both formal and informal, not decline. Indirect impacts to recreation as well, such as conflicting uses by motorized vehicles and equestrians, could result from this incompatible proposed GPA 1196.

I. Transportation/ Traffic

Transportation and traffic impacts would be new and more severe in this area where the proposed GPA 1196 would significantly increase trip generation in this area and, due to its rural location, necessitate trips outside of the community for work, shopping, etc. GPA 1196's failure to comply with the vision and policies of the General Plan to reduce impacts by focusing development on already urbanized areas adjacent to transit will likely result in traffic impacts.

Furthermore, the project will likely increase hazards through incompatible uses by installing higher density development and comparatively high volumes of traffic within the existing rural, equestrian and agriculturally focused residential community.

J. Utilities


New and/or expanded utilities are likely needed to serve the proposed density of the project. On- and off-site effects of such expansion, and growth inducing effects, justify a vote to decline to initiate this GPA.

III. CONCLUSION

For each of the reasons outlined herein, I respectfully ask the Board of Supervisors decline to initiate GPA 1196 and preserve the character and values of this unique rural community.

Thank you for your consideration of these comments.

Sincerely,



Kimberly Foy, Esq.
JOHNSON, SMITH & FOY

Maxwell, Sue

From: Maxwell, Sue
Sent: Friday, May 19, 2017 4:54 PM
To: Young, Alisa; Perez, Juan; Hildebrand, John; Leach, Charissa; COB-Agenda; District 4 Supervisor V. Manuel Perez (District4@RIVCO.ORG); District2; District3; District5; Supervisor Jeffries - 1st District
Subject: May 23, 2017 Agenda Item 16.1 - Public Opinion Opposing GPA 1196

Good afternoon,

One more Public Opinion in opposition to GPA 1196 for review.

Thank you kindly, and have a nice weekend, Sue Maxwell Board Assistant Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
<http://rivcocob.org/>

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-----Original Message-----

From: Lizzy Creek [mailto:lizzylikes2smile@hotmail.com]
Sent: Thursday, May 18, 2017 8:24 PM
To: Alvarez, David <daalvarez@RIVCO.ORG>; Maxwell, Sue <smaxwell@RIVCO.ORG>
Subject: Nuevo opposition

Hello,

I 100% oppose any efforts or actions to rezone the land off Wood Rd. in Mead Valley to high density housing. Our community and I oppose any zone changes or amendments to the General Plan. We sure hope you see us and listen to us. We need your No vote on GPA 1196.

Please work with the owner and builders to get this built as it currently is zoned for 1 acres lots. If there is a will there is a way and I am sure they can make some money building and selling 1 acre home lots. Let's get creative and make the community happy and the owners some money. Community still will get increased traffic and crowded schools and the developers will not make as much money as originally planned and hoped for. We need a compromise. There is already an approved plan for a few hundred of homes off of Wood Rd. and Lurin. Both area's built up to maximum capacity will be just too much to our already crowded streets and school traffic issues. Plus the lack of Sheriff's and fire department staffing in our community is also an issue. Please Vote NO for us.

Sincerely,

Elizabeth Creek

3713
5/23/17 16.1
2017-5-135886

Maxwell, Sue

From: Maxwell, Sue
Sent: Monday, May 22, 2017 9:00 AM
To: 'Margaret Lindou'
Cc: Hildebrand, John
Subject: Public Comment - Opposing GPA 1196 on May 23, 2017, Agenda Item 16-1 MT No 3713

Tracking:	Recipient	Read
	'Margaret Lindou'	
	Hildebrand, John	
	BOS-ALL	
	Juan Perez - TLMA (JCPEREZ@rctlma.org)	
	Leach, Charissa	
	Young, Alisa	
	COB-Agenda (COB-Agenda@rivco.org)	
	Flores, Lorraine S.	Read: 5/22/2017 9:02 AM
	Schemmer, Darin	Read: 5/22/2017 9:00 AM
	Christensen, Karen	Read: 5/22/2017 9:00 AM
	Duarte, Fabio	Read: 5/22/2017 9:00 AM

Good morning Ms. Lindou,

Thank you for contacting the Clerk of the Board of Supervisors.

Your email has been forwarded to the appropriate areas, printed, and included as Back-up to Agenda Item 16.1 for the May 23, 2017 Board Meeting.

Wishing you a pleasant day, and with warm regard,

Sue Maxwell

Board Assistant
Clerk of the Board of Supervisors
4080 Lemon Street, 1st Floor, Room 127
Riverside, CA 92501
(951) 955-1069 Fax (951) 955-1071
Mail Stop #1010
smaxwell@rivco.org
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-----Original Message-----

From: Margaret Lindou [mailto:margaretlindou@yahoo.com]

3713
5/23/17 16.1
2017-5-135887

Sent: Monday, May 22, 2017 6:18 AM
To: COB <COB@RIVCO.ORG>
Subject: Agenda Item 16-1

Dear Riverside County Board of Supervisors,

Please consider carefully the proposal for higher density housing near Citrus Hill High School. The area near Wood Road can not handle thousands of extra cars. Sheriff and support services in the area are inadequate to keep up with higher density housing. Please keep this area of land at it's current 1 house per acre zoning level. Save higher density housing for land that is closer to freeways and multilane roads. Our neighborhoods were planned to be rural.

Thank you for your time.

Sincerely,

Margaret Lindou
18540 Malkoha St.
Perris, Ca. 92570

Agenda Item 16-1: General Plan Amendment Initiation Procedures for General Plan Amendment No 1196.



Val Verde Unified School District

975 W Morgan Street • Perris, CA 92571 • 951-940-6100

May 4, 2017

Re: School Demographics Request

BOARD OF EDUCATION:

Julio Gonzalez
Marla Kirkland
Matthew Serafin
Suzanne Stotlar
D. Shelly Yarbrough

Michael R. McCormick
Superintendent

R. Darrin Watters
Deputy Superintendent
Business Services

Mark LeNoir
Assistant Superintendent
Education Services

Juan Cabral
Assistant Superintendent
Human Resources

Ms. Varela,

Per your e-mail request dated March 29, 2017, the following response is provided:

Citrus Hill High School:

1. Current student population
 - A. The current student population is 1966 Regular Education Students and 148 Special Education Students for a total of 2114 students.
2. Maximum student population based on current size of school and resources.
 - A. Although the District can contractually load classrooms to 35 students, the classroom loading standard for Regular Education Students is 29.17 students X 84 rooms for a total of 2450 students.
 - B. Special Education is currently utilizing 17 classrooms.
3. Current class enrollment (or average) per core academic class
 - A. 1966 Regular Education Students using 84 rooms = 23.40 average students per room.
4. Current class enrollment hard cap per core academic class
 - A. 35 Regular Education Students per room
5. Is there a formula that establishes the anticipated number of students that may be enrolled in the school based upon the number of houses in the district? Example: If 500 additional homes were added within the CHHS boundary limits, what number of students would you anticipate to be added to the CHHS?
 - A. The District's School Facilities Needs Analysis (SFNA) is a document updated annually which establishes the fee for residential construction. This document also establishes a Student Generation Rate currently at 0.2031 high school students per Single Family Detached unit. Example: 500 houses X 0.2031 = 101.55 future students expected.
6. What if the CHHS was unable to accommodate the additional students into the campus due to campus size, hard caps? How would those students then be accommodated? Would busing to another school be a possible or likely option?
 - A. In the event we are unable to accommodate students with the current classroom count, the district would consider for example, adding portable or permanent classrooms, boundary changes to accommodate growth and student transfers to other high schools within the district.
 - B. Val Verde does not transport Regular Education Students.

3713
5/23/17 16.1
2017-5-135837

7. Are you aware of any proposals or expressions of interest to purchase land from the land developer to expand on the campus of CHHS? In addition, if so, would you kindly elaborate?
 - A. The district is not currently interested in any land purchase to expand CHHS. This campus has room for future classroom growth if needed.

Tomas Rivera Middle School:

1. Current student population
 - A. The current student population is 1016 Regular Education Students and 40 Special Education Students for a total of 1056 students.
2. Maximum student population based on current size of school and resources
 - A. Although the District can contractually load classrooms to 35 students, the classroom loading standard for Regular Education Students is 29.17 students per room X 39 rooms = 1059 students
 - B. Special Education is currently utilizing 6 classrooms
3. Current class enrollment (or average) per core academic class
 - A. 1016 Regular Education Students using 33 rooms = 30.79 average students per room
4. Current class enrollment hard cap per core academic class
 - A. 35 Regular Education Students per room
5. Is there a formula that establishes the anticipated number of students that may be enrolled in the school based upon the number of houses in the district? Example: If 500 additional homes were added within the TRMS boundary limits, what number of students would you anticipate to be added to the TRMS?
 - A. The District's SFNA is a document updated annually which establishes the fee for residential construction. This document also establishes a Student Generation Rate currently at 0.1797 middle school students per Single Family Detached unit. Example 500 houses X 0.1797 = 89.85 future students expected.
6. What if the TRMS was unable to accommodate the additional students into the campus due to campus size, hard caps? How would those students then be accommodated? Would busing to another school be a possible or likely option?
 - A. In the event we are unable to accommodate additional student with the current classroom count, the district would consider for example, adding portable or permanent classrooms, boundary changes to accommodate growth and student transfers to other middle schools within the district.
 - B. Val Verde does not transport Regular Education Students.

Mead Valley Elementary School:

1. Current student population
 - A. 655 Regular Education Students and 10 Special ED for a total of 665 students.

2. Maximum student population based on current size of school and resources
 - A. Regular Education Students load per classroom is 30 students X 31 rooms = 930 students
 - B. Special Education is currently utilizing 2 classroom
3. Current class enrollment (or average) per core academic class
 - A. 655 Regular Education Students using 23 rooms = 28.48 average students per room
4. Current class enrollment hard cap per core academic class
 - A. 30 Regular Education Students per room
5. Is there a formula that establishes the anticipated number of students that may be enrolled in the school based upon the number of houses in the district? Example: If 500 additional homes were added within the MVES boundary limits, what number of students would you anticipate to be added to the MVES?
 - A. The District's SFNA is a document updated annually which establishes the fee for residential construction. This document also establishes a Student Generation Rate currently at 0.4570 students per Single Family Detached unit. Example 500 houses X 0.4570 = 228.50 future students expected.
6. What if the MVES was unable to accommodate the additional students into the campus due to campus size, hard caps? How would those students then be accommodated? Would busing to another school be a possible or likely option?
 - A. In the event we are unable to accommodate additional student with the current classroom count, the district would consider for example, adding portable or permanent classrooms, boundary changes to accommodate growth and student transfers to other elementary schools within the district.
 - B. Val Verde does not transport Regular Education Students.

Developers must pay school fees prior to construction; the District's current Level 2 fee is \$4.25 per square foot. The fee is used to offset the cost to provide housing for future students.

If you have any further questions, please feel free to contact me.

Sincerely,



Stacy Strawderman, Director
Facilities, Contracts and Purchasing Services
951-940-6136 x 10652
951-940-6112 fax