S Scott Rose <rosescottrandall@gmail.com>

I am Scott Rose Adjacent property Owner to the proposed project (P04-0260). I oppose an ordinance to allow this new zone designation and allow this developer rights that should have expired within 5 years of (2004 & 2007),the TT 31930 has been given too many time extensions, for Spring Canyon Recovery LLC rights to develop on sensitive hillsides and within the Alesandro Arroyo.

The mitigated negative declarations for these previous TM are too old and inaccurate; and need a new environmental initial study and assessment on significant impacts to a unique riparian habitat in the Alesandro Arroyo, General plan figure OS-4(Arroyos). These Arroyos provide corridors which wildlife use to migrate between habitat areas. OS page 16: (Attached)

I have lived adjacent to this property and have observed and document all the plants and wildlife since 2003-2024 (attached).

The rezone from Public facilities (PF) designation was used to protect and preserve institutions and built features like earthen dams for flood control.

The Dam is located in the bottom of the Alesandro Arroyo watershed.

The proposed Land use designation to Residential Conservation is an Oxymoron with two contradictory words used together, Residential & Conservation.

Residential development is not conservation.

Conservation refers to preventing wasteful uses of resources but also related to the preservation, protection and restoration of the natural environment of plants and wildlife. General plan Land Use Objective-3, specifically refer to" protecting hillsides, open space and natural habitat"

And LU-4 "minimizes the extent of urban development in the hillsides, and mitigates any adverse impacts associated with urbanization and adheres to the protections for hillside development set forth in Proposition R and measure C".

I have read the previous Mitigated negative declaration for Tentative Tract 31930 (P0-4-0260) and find it not adequate for this proposed Zone Change from PF to RC. The property is a unique area integrating both riparian and chaparral habitat.

Chaparral is unique in that it has cyclical fires as we just had on the property in question, July 21, 2024 and the Fire Chief explained to me when assessing property damage at our adjacent home, that the last fire in the Alesandro Arroyo was in 2000 (24 years ago). As such this area should be declared (designated) a Public Safety Fire Hazard Zone and not for development of homes especially RC.

We are opposed to a zone change ordinance from PF to RC. Thoughtfully,

Scott Rose 6381 Century Hill Drive. Riverside, Calif. 92506 APN: 0243-180-09)



OPEN SPACE AND Conservation Element

informative application processing packet that is kept up to date and in compliance with State law.

For more policies concerning Proposition R and Measure C review the Land Use and Urban Design and Open Space Elements.

In particular, review Policies LU-4.1, LU-4.4,LU-6.1, LU-6.3, LU-54.1, LU-54.3, LU-59.1, LU-63.5, LU-64.1, & OS-2.1.



Objective OS-4:	Preserve designated buffers between urban and rural uses for their open space and aesthetic benefits.
Policy OS-4.1:	Continue to implement Proposition R and Measure C.
Policy OS-4.2:	Establish buffers and/or open space between agricultural and urban uses so that the potential impacts from urban development

Policy OS-4.3: Explore the possibility of establishing a fee for all new development in Riverside for land banking to create new buffers and/or purchase sensitive lands between urban development and existing open space resources.

OUR ARROYOS AND BIOLOGICAL Resources

will be mitigated.

The arroyos of Riverside are naturally occurring ephemeral drainages created over thousands of years as seasonal rains eroded the hills. Natural runoff in addition to that from agriculture and development has created a year-round supply of water, and riparian plants flourish throughout the year within the arroyos.

The arroyos and other open space areas of Riverside support an abundance of wildlife species and plant communities. The arroyos also provide corridors which wildlife use to migrate between habitat areas. Wildlife and the habitat in which they live enhance our own life experiences. If we protect habitat, we increase the probability that important and critical wildlife species will survive and flourish.

The expansion of urban areas into previously undeveloped areas of the City and the sphere have infringed upon the health of the arroyos and the plants and animals that rely upon them. The consequences of development include excessive grading, encroachment into the logical natural stream channel, increased urban runoff and conflicts created by pets and invasive exotic plants.

OPEN SPACE AND CONSERVATION ELEMENT



The community vision for the arroyos of Riverside is of natural, healthy waterways meandering through well-planned residential development and natural, protected areas. Where development does occur, homes near the arroyos should reflect the natural lines of the landscape and be designed to blend with the contours, colors and seasonal aridity of the landscape. Wildlife using the natural corridors provided by the arroyos should have unrestricted access and movement, with minimal barriers from roads and fences.

Striking a balance between habitat preservation and meeting Riversiders' needs for housing, jobs and services is a major planning challenge. This section of the Open Space and Conservation Element sets forth the City's commitment to the conservation of Riverside's arroyos and recommends objectives and policies to accomplish this planning challenge.

RIVERSIDE'S ARROYOS

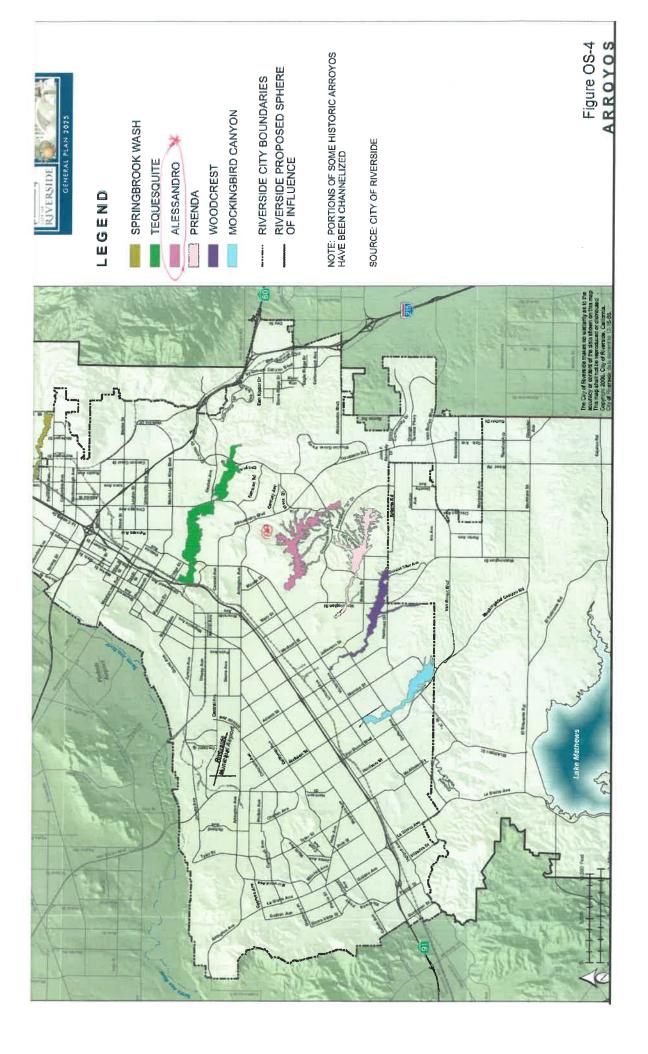
Six arroyos, recognized by the City's Grading Code (Title 17), traverse the City (see Figure OS-4 – Arroyos):

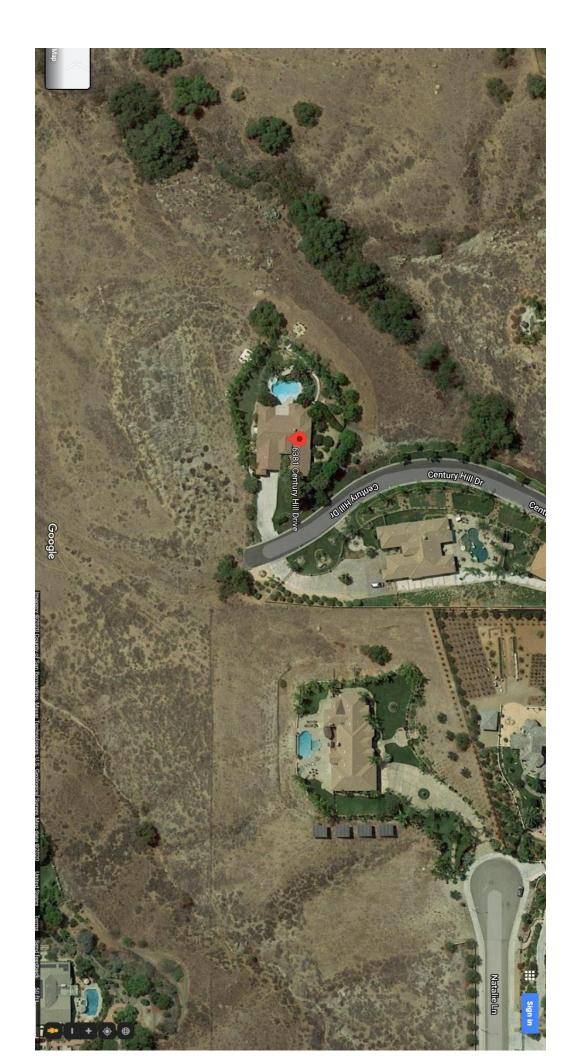
- Springbrook Wash Arroyo
- Woodcrest Arroyo
- Alessandro Arroyo
- est Arroyo 🔹 🔅
- Prenda Arroyo
- Mockingbird Canyon Arroyo
- Tequesquite Arroyo

Springbrook Wash Arroyo starts in Box Springs Mountain and flows to the Santa Ana River. Approximately one-fifth of the stream channel is cemented, with some remaining areas of healthy riparian vegetation.

Tequesquite Arroyo runs through two golf courses, the Andulka Park site, RCC, the Evans Sports Complex and the Tequesquite Park site. It is partially channelized at the golf courses and when it passes through Downtown. The banks have been planted with non-native grasses at the golf courses. Only the portion southeasterly of the 91 Freeway is mapped for protection under the Grading Code.

The Woodcrest, Prenda, Alessandro and Mockingbird Arroyos all originate in the southerly hills of Riverside and flow to the Santa Ana River. All of these arroyos are largely in a natural condition southerly of the 91 Freeway within the Arlington Heights Greenbelt and Alessandro Heights area. Each is also constrained with a dam as shown in Figure PS-4 (Flood Hazard Areas) in the Public Safety Element. Northerly of the 91 Freeway, the arroyos are channelized or undergrounded en route to the Santa Ana River and are not mapped for protection under the Grading Code.









Objective LU-2:	Recognize and enhance the Santa Ana River's multiple functions: a place of natural habitat, a place for recreation and a conveyance for stormwater runoff.		
Policy LU-2.1:	Cooperate and collaborate with Riverside County in developing recreational opportunities along the Santa Ana River.		
Policy LU-2.2:	Utilize the 2004 Santa Ana River Task Force Report in planning, programming and implementing environmental and recreational		

Hillsides

See this Element under "Major Hills" and the Open Space and Conservation Element under "Overarching Objectives" for additional information on hillsides.

In particular, review Objective OS-2.

Riverside's many hills provide textured and often dramatic visual backdrops. Preservation of the City's hillsides will protect the many benefits of these areas for future generations. Besides their visual qualities, protected hillsides provide recreational opportunities and wildlife habitat.

improvements to the River area.

	Objective LU-3:	Preserve prominent ridgelines and hillsides as important community visual, recreational and biological assets.
	Policy LU-3.1:	Pursue methods to preserve hillside open space and natural habitat.
	Policy LU-3.2:	Seek annexation of properties that will reduce ridgeline/hillside development on the City's periphery.
For more policies concerning Proposition R and Measure C review the Land Use and Urban Design and Open Space Elements.	Objective LU-4:	Minimize the extent of urban development in the hillsides, and mitigate any adverse impacts associated with urbanization to the extent feasible.
Inparticular, review Policies LU-4.4, LU-6.1, LU-6.3, LU-54,1, LU-54.3, LU-59.1, LU-63.5, LU-64.1, OS-2.1 & OS-4.1.	Policy LU-4.1:	Adhere to the protections for hillside development set forth in Proposition R and Measure C.

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Most notably, the Land Use Map also includes three mixed-use land use categories, ranging from lowest intensity (Mixed Use-Neighborhood) to the highest intensity (Mixed Use-Urban) These categories are extremely important for achieving much of Riverside's vision of more vibrant activity centers, revitalization of underutilized areas and a reduction in sprawling development. All of the land use designations are described in greater detail below.

SINGLE FAMILY RESIDENTIAL LAND USE DESIGNATIONS

Agricultural/Rural Residential (A/RR)

The Agricultural/Rural Residential designation is intended to provide for extremely low density residential uses (1 unit per 5 acres) so as to allow agricultural (particularly citrus) uses to continue. This designation is intended to further the intent of Proposition R and Measure C, which were approved by Riverside voters in 1979 and 1987, respectively. The designation is applied to two large areas within the City - most of the Arlington Heights Neighborhood and the northern portion of La Sierra Acres (Rancho La Sierra).

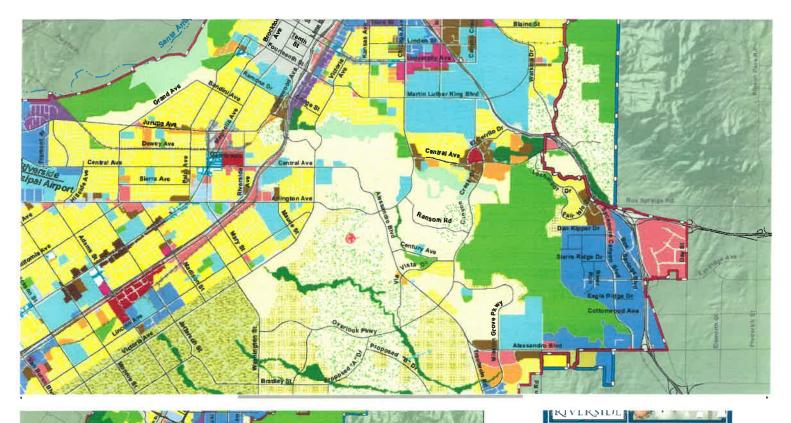
Hillside Residential (HR)

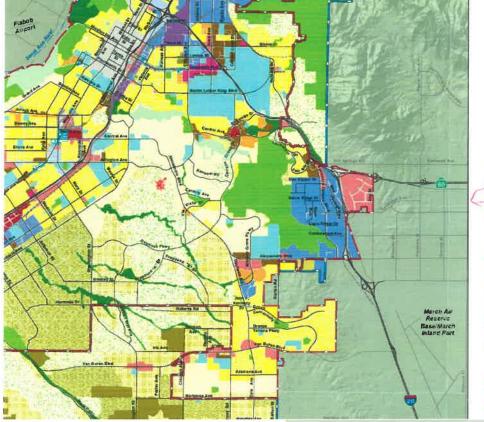
The Hillside Residential designation is designed to limit development of Riverside's ecologically sensitive and visually prominent hillside areas. This designation has been applied to most hillside areas where slopes exceed fifteen percent and allows a maximum residential intensity of 0.63 units per acre with a Planned Residential Development (PRD) permit. Per the intent of Proposition R and Measure C, this designation is applied to numerous hillside areas throughout the City; significant portions of La Sierra Hills, Alessandro Heights and Hawarden Hills are under this designation. Clustered development under a Planned Residential Development permit (PRD) is consistent with this designation.

Semi-Rural Residential (SRR)

This designation is applied in areas that have historically fostered largelot single family development while allowing enough space for animal keeping as an auxiliary use. A maximum density of 2.1 dwelling units per acre ensures that most properties have the capacity to accommodate one or more horses or other animals.¹² This designation is primarily applied to the central portion of the La Sierra neighborhood and provides a lifestyle option unique for a City of

 $^{^{12}}$ Greater densities, up to a maximum of 3.3 dwelling units per acre, can be achieved with a Planned Residential Development Permit





GENERAL PLAN 2025 LEGEND - RIVERSIDE CITY BOUNDARIES RIVERSIDE PROPOSED SPHERE OF INFLUENCE POTENTIAL SPECIFIC PLAN **GENERAL PLAN 2025** LAND USE ELEMENT A - AGRICULTURAL A/RR - AGRICULTURAL/RURAL RESIDENTIAL HR - HILLSIDE RESIDENTIAL SRR - SEMI RURAL RESIDENTIAL VLDR - VERY LOW DENSITY RESIDENTIAL LDR - LOW DENSITY RESIDENTIAL MDR - MEDIUM DENSITY RESIDENTIAL MHDR - MEDIUM HIGH DENSITY RESIDENTIAL HDR - HIGH DENSITY RESIDENTIAL VHDR - VERY HIGH DENSITY RESIDENTIAL C - COMMERCIAL CRC - COMMERCIAL REGIONAL CENTER DSP - DOWNTOWN SPECIFIC PLAN OSP - ORANGECREST SPECIFIC PLAN O - OFFICE B/OP - BUSINESS/OFFICE PARK



Land Use Designations				
Land Use	Maximum du/acre ^(a) or FAR/acre ^(b)	Typical du/acre ^(a) or FAR/acre ^(b)	Maximum Population Density ^(c)	Primary Intent of Land Use Designations
Residential Land Uses				
Agricultural/Rural Residential (A/RR)	0.20 du/acre	0.20 du/acre	0.6 persons/acre	Implement Proposition R and Measure C; allow for residential use on large agricultural and citrus parcels
Hillside Residential (HR)	0.50 du/acre; 0.63 du/acre w/PRD	0.50 du/acre	1.5 persons/acre 1.89 persons/acre w/PRD	Implement Proposition R and Measure C; allow for sensitive development of residential homes where slopes exceed 15%
Semi-Rural Residential (SRR)	2.1 du/acre 3.3 du/acre w/PRD	1.5 du/acre	6.3 persons/acre 9.9 persons/ acre w/PRD	Single family with emphasis on animal keeping
Very Low Density Residential (VLDR)	2.0 du/acre 3.2 du/acre w/PRD	1.5 du/acre	6 persons/acre 9.6 persons/ acre w/PRD	Single family, large lot residential
Low Density Residential (LDR)	4.1 du/acre 6 du/acre w/PRD	3 du/acre	12.3 persons/acre 18 persons/ acre w/PRD	Single family, large lot residential uses
Medium Density Residential (MDR)	6.2 du/acre; 8 du/acre w/PRD	5.5 du/acre	18.6 persons/acre 24 persons/ acre w/PRD	Single-family residential uses
Medium-High Density Residential (MHDR)	14.5 du/acre	12 du/acre	43.5 persons/acre	Single family, small lot residential uses
High Density Residential (HDR)	29 du/acre	20 du/acre	87 persons/acre	Multi-family, condominiums and apartments
Very High Density Residential (VHDR)	40 du/acre	30 du/acre	120 persons/acre	Multi-family, condominiums and apartments

Table LU-3 Land Use Designations



Table LU-4 Planned Land Uses

Land Use Category		Net Acreage in the City	Percent of Total City Acres
A/RR	Agricultural/Rural Residential	5,116	11.7639%
HR	Hillside Residential	4,061	9.3380 <mark>%</mark>
SRR	Semi-Rural Residential	1,227	2.8214%
VLDR	Very Low Density Residential	1,327	3.0513%
LDR	Low Density Residential	2,563	5.8934%
MDR	Medium Density Residential	10,877	25.0109%
MHDR	Medium High Density Residential	665	1.5291%
HDR	High Density Residential	856	1.9683%
VHDR	Very High Density Residential	108	0.2483%
Total Resi	dential	26,800	61.6248%
С	Commercial	1,415	3.2537%
CRC	Commercial Regional Center	228	0.5243%
0	Office	293	0.6737%
Total Commercial and Office		1,936	4.4517%
B/OP	Business Office Park	3,953	9.0897%
1	Industrial	582	1.3383%
Total Indu	ustrial/Office Park	4,535	10.4279%
DSP	Downtown Specific Plan	433	0.9957%
OSP	Orangecrest Specific Plan	7	0.0161%
Total Downtown Specific Plan		440	1.0118%
MU-N	Mixed Use Neighborhood	68	0.1564%
MU-V	Mixed Use Village	490	1.1267%
MU-U	Mixed Use Urban	275	0.6323%
Total Mixed Use		833	1.9154%



Table	LU-4
Planned	Land Uses

Land Use Category		Net Acreage in the City	Percent of Total City Acres
A	Agricultural	C	0.0000%
Ρ	Public Park	3,211	7.3835%
PR	Private Recreation	856	1.9683%
OS	Open Space/Natural Resources	931	2.1408%
PF	Public Facilities Institutional	3,947	9.0759%
RAT	Kangaroo Rat Habitat	0	0.0000%
Total Community Amenities and Support8,945		20.5684%	
City Net Total ⁽¹⁾		43,489	100.0000%



- Policy LU-4.2: Enforce the hillside grading provisions of the City's Grading Code (Title 17) to minimize ground disturbance associated with hillside development; respect existing land contours to maximum feasible extent.
- Policy LU-4.3: Work closely with the County of Riverside, emphasizing the City's need to participate in the development review of projects proposed in surrounding unincorporated areas. Work to ensure that such developments proceed in concert with City of Riverside standards.
- Policy LU-4.4: Ensure that the City provides comments to Riverside County on proposed new hillside development in the City's Sphere of Influence, taking into consideration the provisions of Proposition R and Measure C, the RC Zone, the Hillside Residential land use designation and the City's Grading Code (Title 17).
- Policy LU-4.5: Seek opportunities for new or enhanced trail/pedestrian linkages between hillside areas and other components of Riverside Park.
- Policy LU-4.6 Ensure protection of prehistoric resources through consultations with the Native American tribe(s) identified by the Native American Heritage Commission pursuant to Government Code § 65352.3 and as required by the California Environmental Quality Act.

Arroyos

Arroyos are not just conduits for water, but rich and varied areas of animal and plant life. In Riverside's vision for its future, arroyos will play an increased role in serving as connectors between Riverside's natural areas and its neighborhoods.

Objective LU-5 <mark>:</mark>	Preserve and protect the natural integrity of Riverside's arroyos.	See the Open Space and Conservation Element under "Our Arroyos and Biological Resources" for more information on this topic.	
Policy LU-5.1:	Minimize public and private development in and in close proximity to any of the City's arroyos.	In particular review Figure OS-4 – Arroyos.	

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See this Element under "Sphere of Influence" for additional information on City/County Coordination and the Air Quality and Open space Elements as well.

In particular, review Objectives LU-87, AQ-7 and Policy OS-1.7.

For more policies concerning Proposition R and Measure C review the Land Use and Urban Design and Open Space Elements.

In particular, review Policies LU-4.1, LU-6.1, LU-6.3, LU-54.1, LU-54.3, LU-59.1, LU-63.5, LU-64.1, OS-2.1 & OS-4.1.

See the Historic Preservation Element under "Goals and Polices for Historic Preservation in Riverside" for additional information on the Protection of prehistoric resources.

In particular, review Objective HP-1.0.



Policy LU-5.2:	Recognize the City's arroyos as components of Riverside Park.
Policy LU-5.3:	Encourage that any crossings of the City's major arroyos are span bridges or soft bottom arch culverts that minimize disturbance of the ground and any wetland area. At grade crossings are strongly discouraged in major arroyos. To minimize disturbance of the arroyo the design will take into consideration aesthetics, biological, hydrological and permitting (i.e., MSHCP, ACOE, DFG, etc.) requirements to promote the free movement of water and wildlife. In addition, areas of the arroyo disturbed by construction will be restored consistent with requirements of the MSHCP, as well as the ACOE's 404 Permit Program and DFG's Streambed Alteration Agreement Program as applicable.

- Policy LU-5.4: Continue to require open space easements in conjunction with new development to be recorded over arroyo areas, per the City's Grading Code.
- Policy LU-5.5: Work with Riverside County to develop, implement and maintain comprehensive management plans for protection of entire arroyo systems.
- Policy LU-5.6: The design of the crossing of the Alessandro Arroyo, for the purposes of connecting Overlook Parkway, will be considered through the Specific Plan process noted in polices CCM-4.2 and LU-13.2. The design will address those issues identified in Policy LU-5.3.

Greenbelt and Agricultural Uses

Riverside's heritage is firmly grounded in the citrus industry. But Riverside's future also embraces this heritage by preserving the City's greenbelt and perpetuating agricultural uses, especially in the Arlington Heights area.

Objective LU-6: Retain functional agricultural areas within Riverside, particularly within the greenbelt area, while allowing for sensitive, low-intensity residential uses.

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See this Element under "Arlington Heights and the Greenbelt" and the Open Space Element under "Agricultural Preservation" for more information on agricultural preservation.

In particular, review Objective OS-3.



- Policy LU-6.1: Enforce and adhere to the protections for agricultural areas set forth in Proposition R and Measure C.
- Policy LU-6.2: Preserve the viability of the Gage Canal to enable continued agricultural and citricultural uses within the City.
- Policy LU-6.3: Protect and maintain the Arlington Heights Greenbelt agricultural character through adherence with applicable provisions of the Subdivision and Zoning Codes in addition to Proposition R and Measure C.
- Policy LU-6.4: Review development within agricultural areas to encourage efficient land use and facilitate long-term perpetuation of citrus stock.
- Policy LU-6.5: Encourage the potential relocation of the University of California, Riverside's experimental citrus groves to one or more locations within the Arlington Heights neighborhood to help the neighborhood retain its agricultural character.

PROTECTING WILDLIFE, ENDANGERED SPECIES & THEIR HABITAT

Although a well-developed urban area, Riverside is also home to an abundant variety of plants and animals, some of which are considered endangered. Within the City limits, Sycamore Canyon Wilderness Park and many of the local hillsides provide plant and animal habitat, while undeveloped areas adjacent to the City, particularly Box Springs Mountain Regional Reserve and land in the vicinity of Lake Mathews are home to tens of different species of rare and endangered birds, plants and small mammals. This Plan aims to preserve and protect these habitat areas, recognizing their inherent ecological value. In addition, this Plan recognizes and supports the efforts of Riverside County to take a more holistic approach to wildlife and habitat conservation. The Western Riverside County Multiple Species Habitat Conservation Program (MSHCP) identifies areas throughout Western Riverside County intended for the long-term protection of species and their habitats.

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For more policies concerning Proposition R and Measure C review the Land Use and Urban Design and Open Space Elements.

In particular, review Policies LU-4.1, LU-4.4, LU-6.3, LU-54.1, LU-54.3, LU-59.1, LU-63.5, LU-64.1, OS-2.1 & OS-4.1.



conservation Pan and/or El Sobrante Landfill Habitat Conservation Plan" for more

information on this topic.

See the Open Space and Conservation Element under "Our Arroyos and Biological Resources" for more information on this topic.	Objective LU-7:	Preserve and protect significant areas of native wildlife and plant habitat, including endangered species.
In particular, review Objectives OS-5 and OS-6.	Policy LU-7.1:	Continue to maintain Sycamore Canyon Wilderness Park as primarily a functioning wildlife habitat.
	Policy LU-7.2:	Design new development adjacent and in close proximity to native wildlife in a manner which protects and preserves habitat.
	Policy LU-7.3:	Continue to require natural open space easements in conjunction with new development in hillside and arroyo areas over non-graded areas of the development.
See the Open Space and Conservation Element under "Stephens' Kangaroo Rat Habitat Conservation Plan, Lake Mathews	Policy LU-7.4:	Continue to participate in the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).
Multiple Species Habitat	Тир Диш т	

THE BUILT ENVIRONMENT

This section presents citywide objectives and policies on land use and urban design issues related to the City's built environment.

GROWING SMARTER

Riverside is committed to ensuring that the City's assets and distinctive gualities are preserved while the City works to accommodate a fair share of regional population growth.

To this end, the entire General Plan program focuses on incorporating "smart growth" principles into planning and development decisions. In Riverside, a major tenet of smart growth includes focusing development in already urbanized parts of the City, rather than spreading growth to the urban fringes. Such a principle reduces urban sprawl, saves money by making better use of existing infrastructure and builds on the established character of neighborhoods. Smart Growth has been embraced by a coalition of private sector, public sector and non-governmental organizations as a way to preserve our cities and our environment in a manner than benefits communities and property interests.



Private Recreation (PR)

The Private Recreation designation is applied to such areas as private golf courses, equestrian centers and amusement parks that provide opportunities for primarily outdoor recreation. Allowable uses are similar in nature to those permitted in public parks, but are not under the public domain.

Open Space/Natural Resources (OS)

The Open Space/Natural Resources designation provides lands, both private and public as shown on the Land Use Map, for the preservation of natural resources, hillsides and creeks; as well as open space for the protection of public health and safety, including floodways and stormwater retention areas.

Public Facilities and Institutional Uses (PF)

The Public Facilities and Institutional Uses designation provides for schools, hospitals, libraries, utilities, the municipal airport (precise uses for the airport property are defined in the Airport Master Plan), institutional offices (e.g., religious, educational, social or similar organizations), and government institutions. Religious assembly and day care uses may be allowed within this designation. Specific sites for public/semipublic uses are subject to discretionary approval under the Zoning Ordinance. The maximum intensity of development is a floorarea ratio of 1.0.

IMPLICATIONS OF LAND USE POLICY

The land use changes called for in this Land Use and Urban Design Element, will, if fully implemented by the City of Riverside, lead to population and housing increases within the City.

In 2003, the City of Riverside's population was estimated to be 274,071 by the California State Department of Finance. This population was housed in an estimated 90,511 housing units, yielding just over 3 people per household.

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