

Exhibit 3 - P12-0601, P12-0697, P12-0698, Aerial Photo

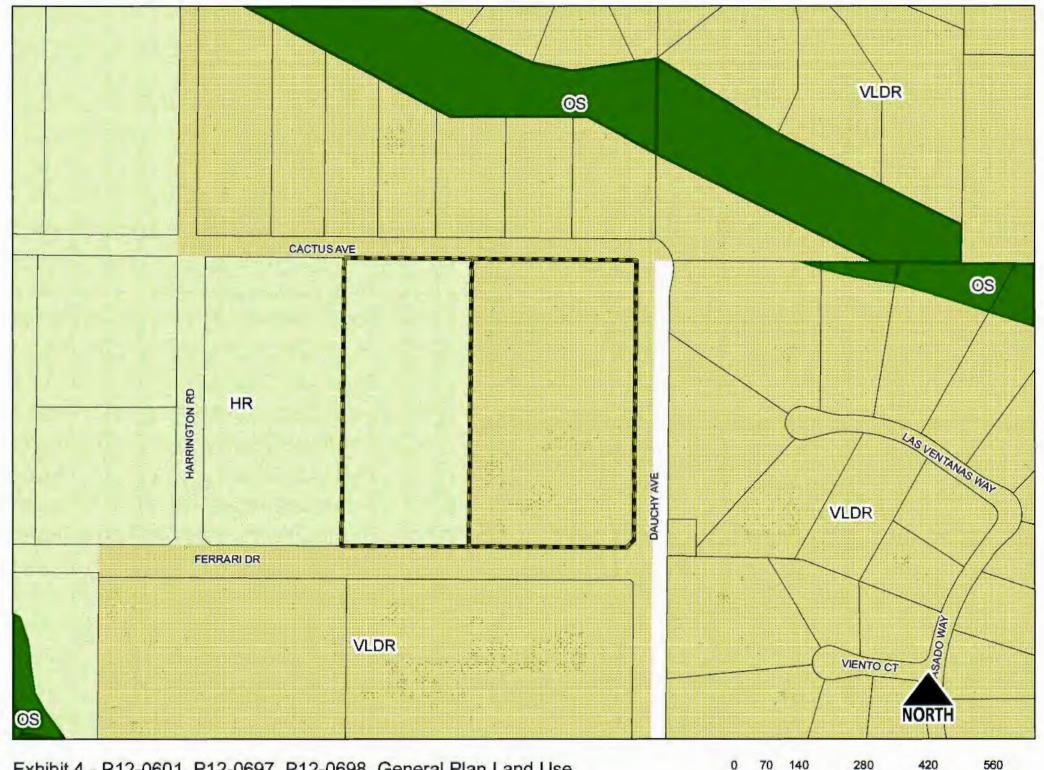
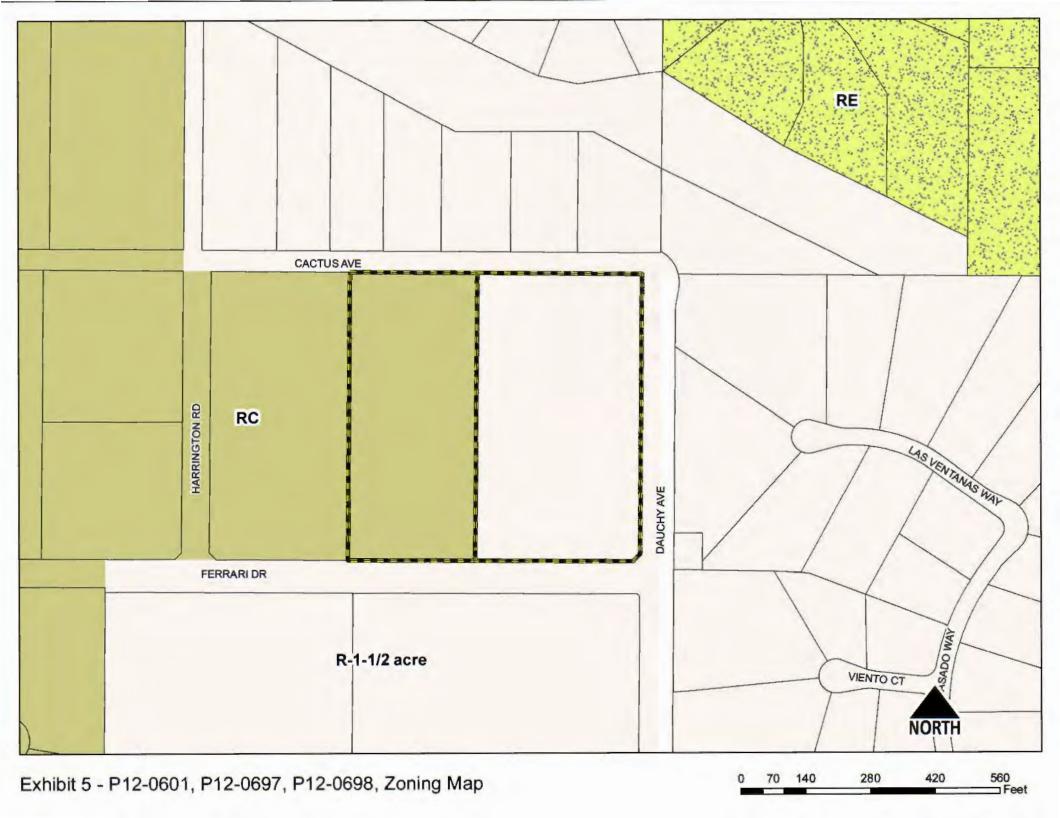


Exhibit 4 - P12-0601, P12-0697, P12-0698, General Plan Land Use



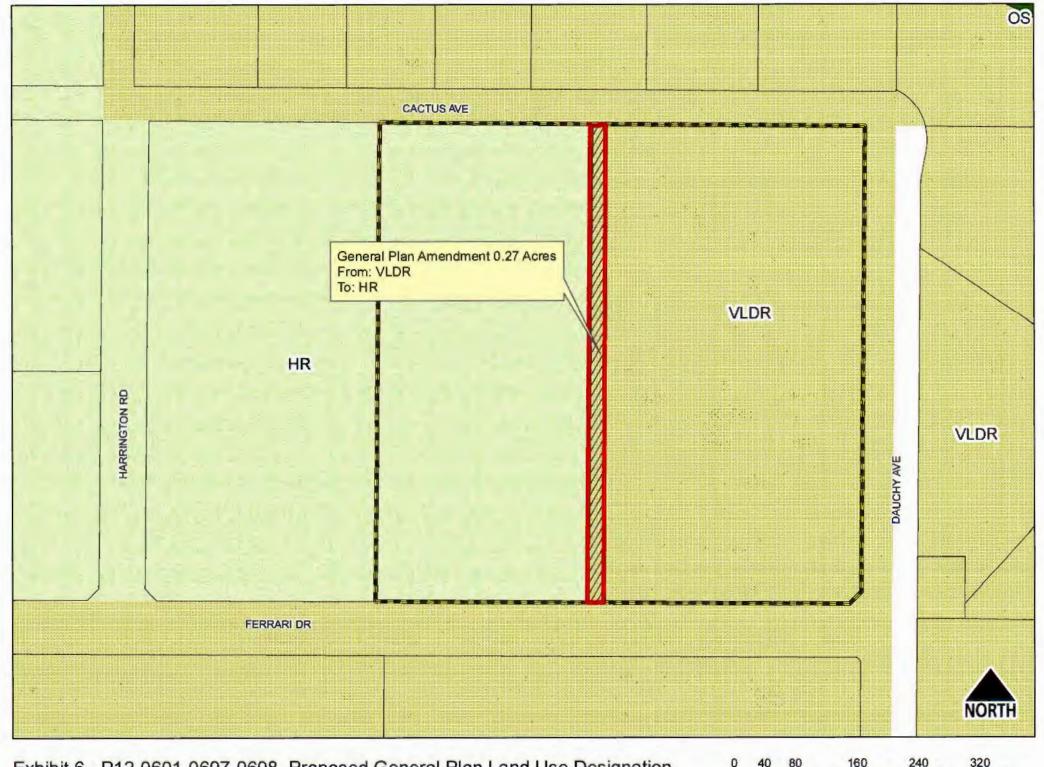


Exhibit 6 - P12-0601-0697-0698, Proposed General Plan Land Use Designation



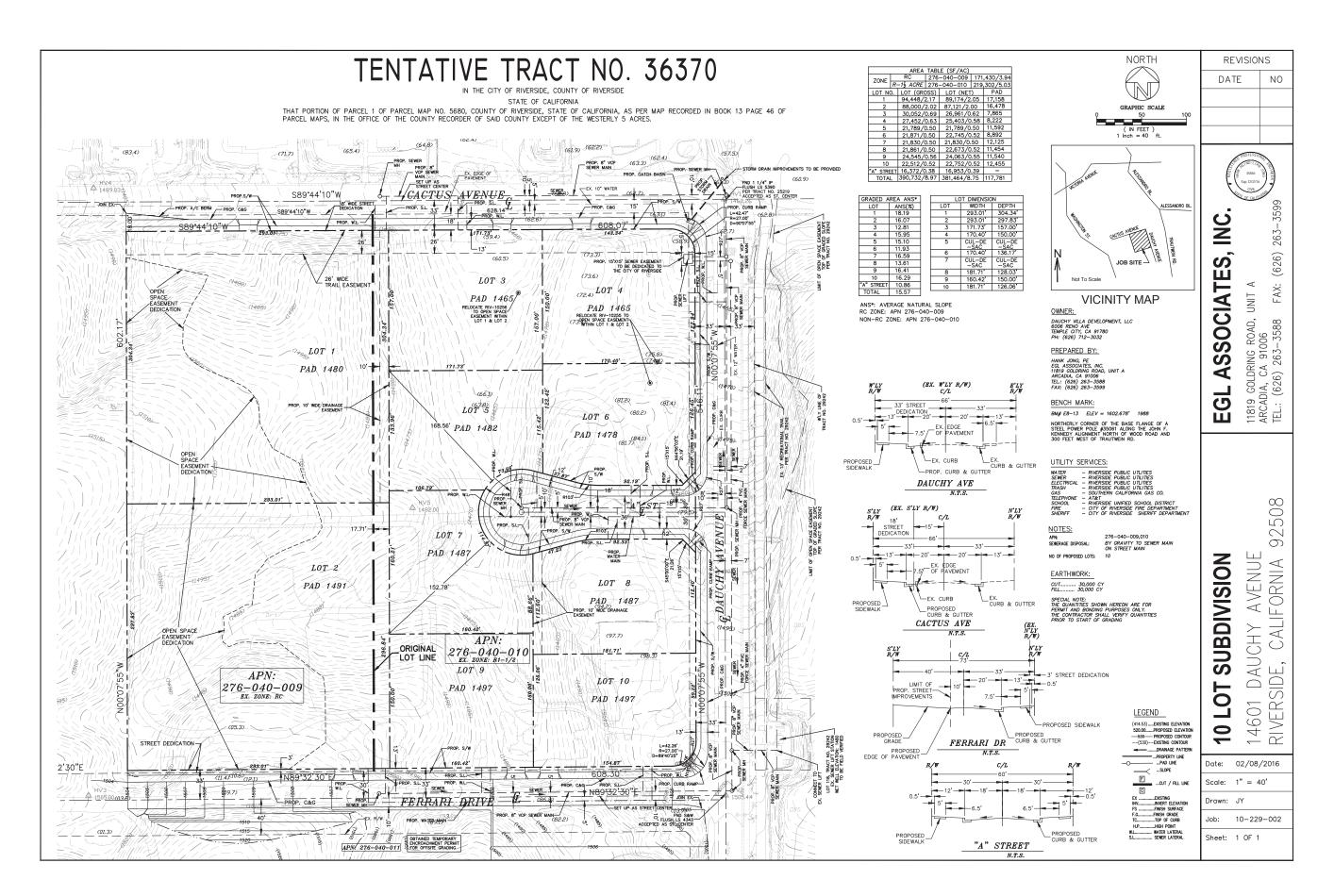


Exhibit 8 - P12-0601, P12-0697, P12-0698, Tentative Tract Map

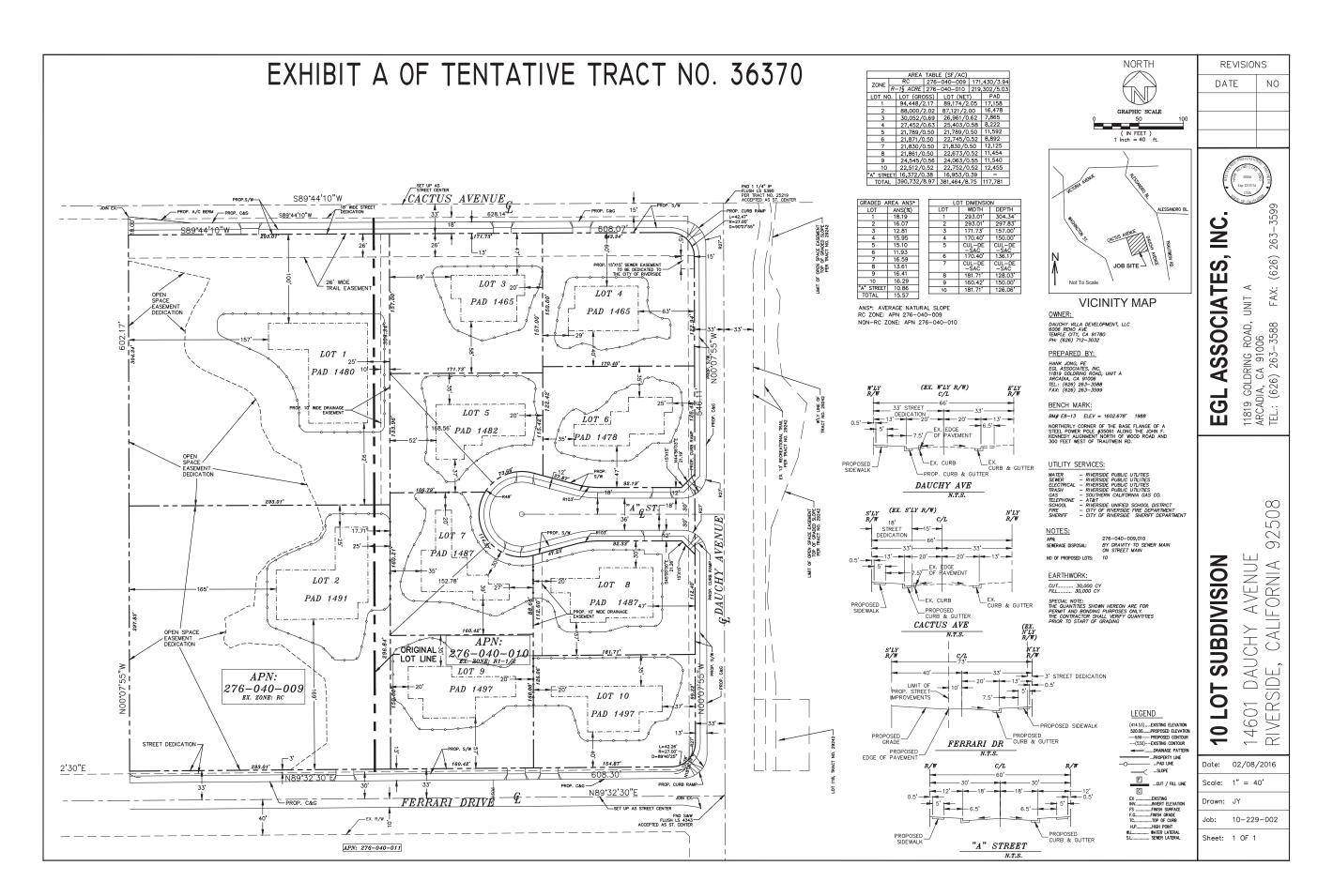


Exhibit 8 - P12-0601, P12-0697, P12-0698 Tentative Tract Map

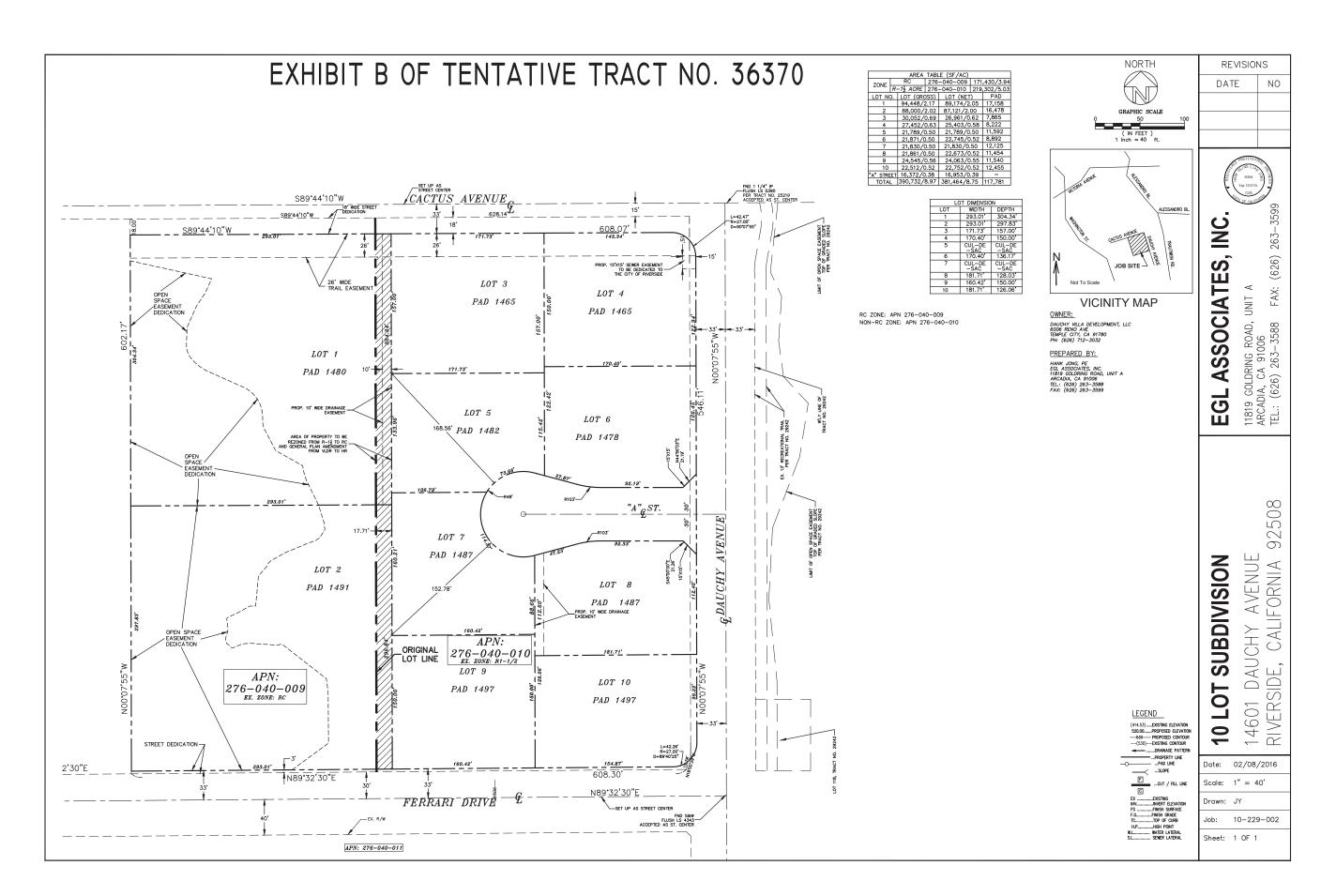
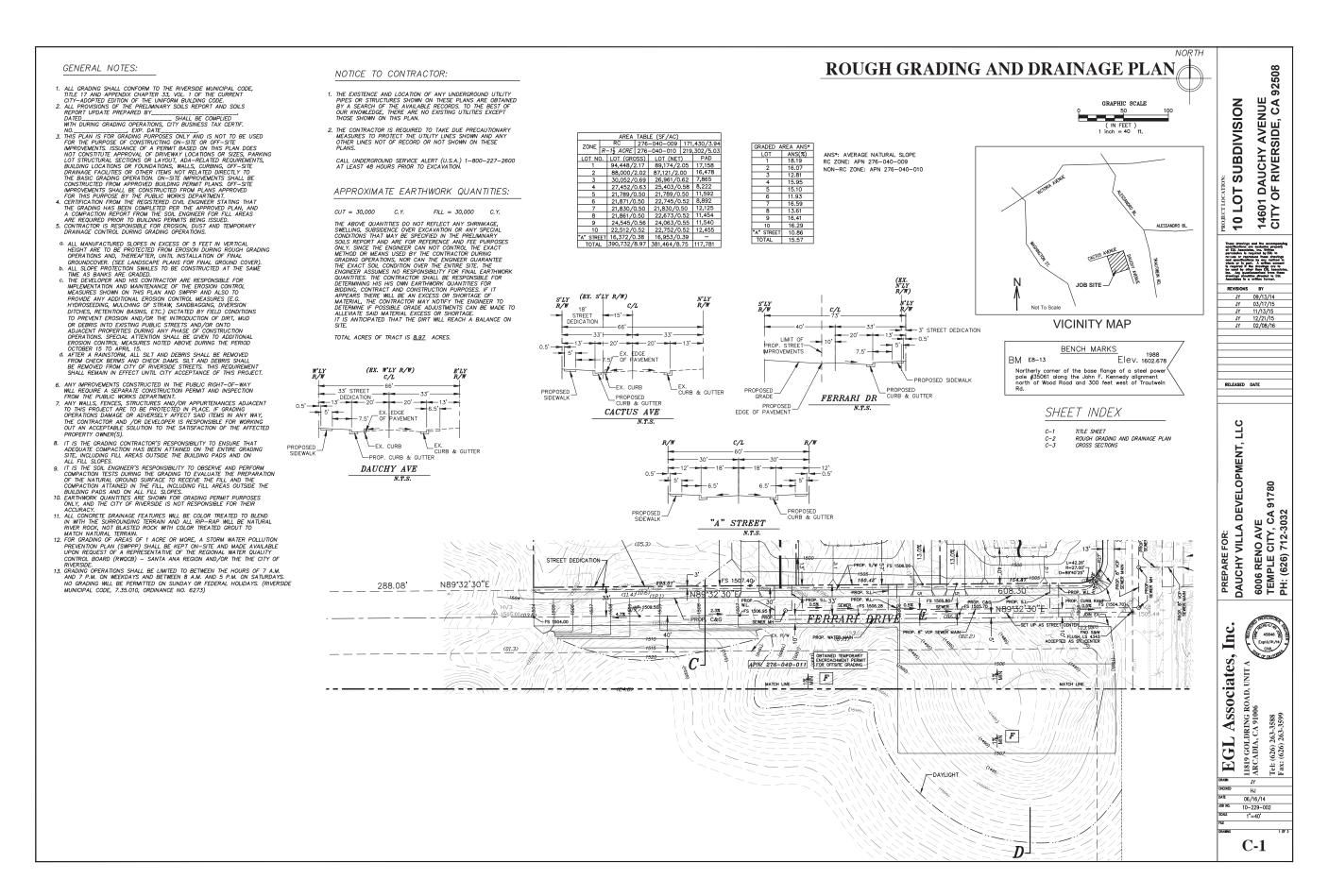


Exhibit 8 - P12-0601, P12-0697, P12-0698 Tentative Tract Map



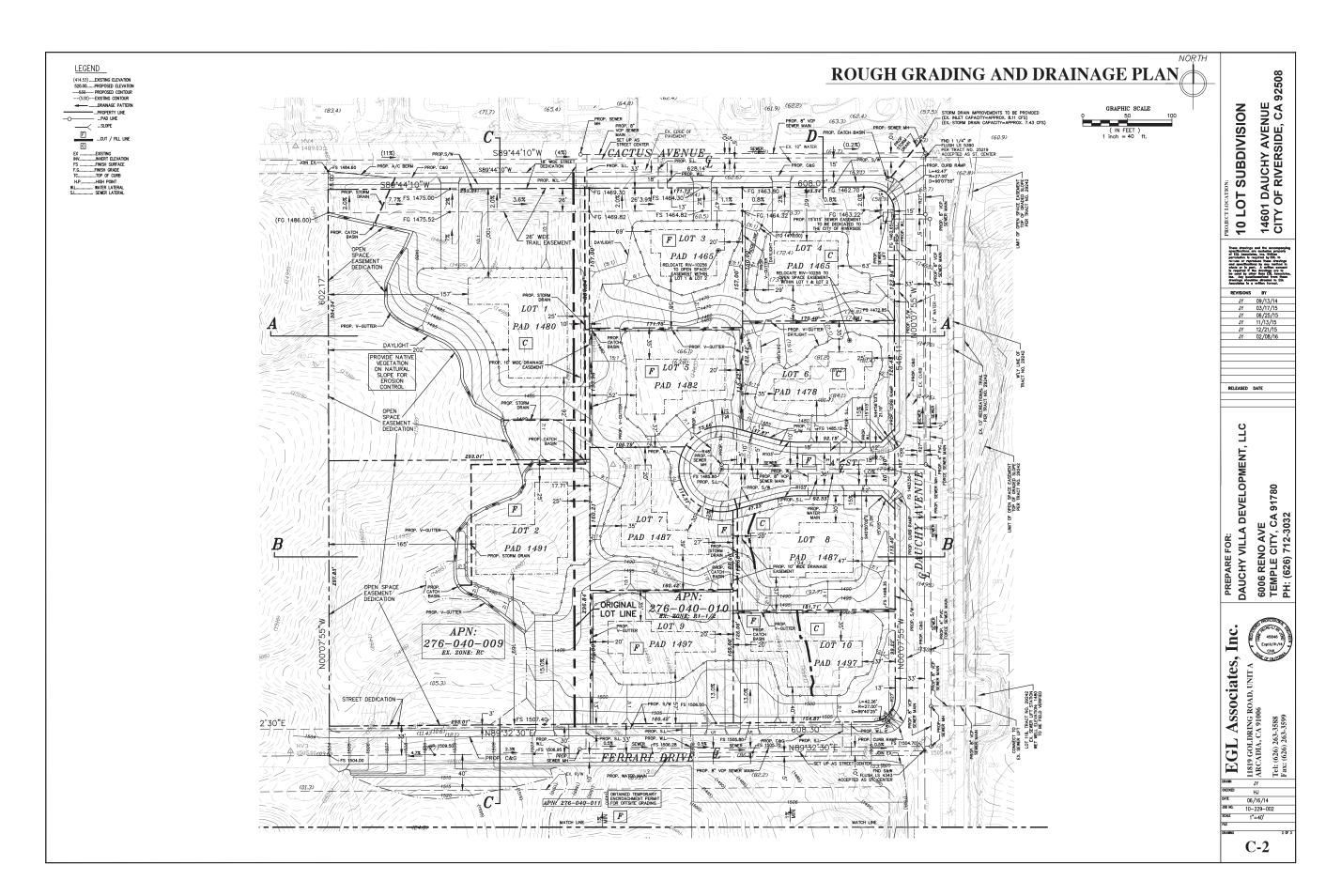


Exhibit 9 - P12-0601, P12-0697, P12-0698, Grading Plans

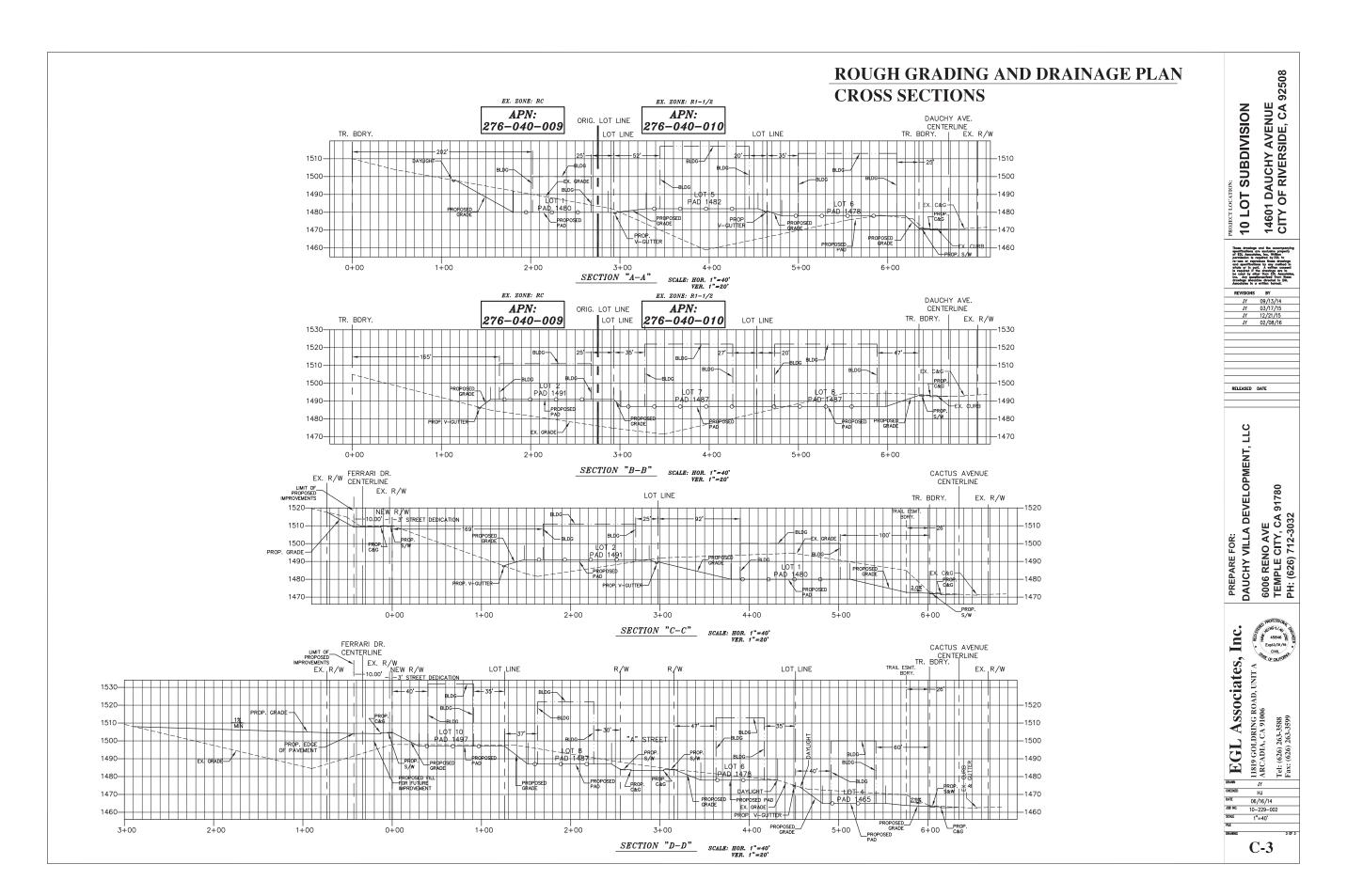


Exhibit 9 - P12-0601, P12-0697, P12-0698, Grading Plans



Exhibit 10 - P12-0601-0697-0698, Existing Site Photos

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City of Riverside Planning Division Attn: Brian Norton - P12-0698, P12-0697 & P12-0601 3900 Main Street Riverside, CA 92522

Response to Public Notice

Any information submitted on this form is public record and can be viewed by any member of the public upon request.

Please note that public comment for this project closes at the Public Meeting on July 23, 2015

Please enter any comments you may have about this proposal below. (Please print or type all information):

COMMENTS: Dear S	Cannina		ission	
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July 22, 2015

To: Riverside City Planning Commission

From: Friends of Riverside's Hills

Re: July 23 CPC meeting agenda item 8: PLANNING CASES P12-0698, P12-0697 AND P12-0601

Members of the Planning Commission:

Friends of Riverside's Hills (FRH) opposes this project in its present form because the amount of grading it calls for on the two RC-zoned parcels it creates violates provisions of the City's Grading Code that are intended to help preserve our City's hills in their natural form. The problems with the proposed grading on these parcels can be fixed with a reduction in the areas to be graded, especially in the grossly excessive graded area proposed for Lot 1, and a consequent enlargement of the corresponding conservation easement areas in order to abide by the Grading Code.

The Grading Code, in Riverside Municipal Code section 17.28.020 "Hillside/Arroyo Grading", includes the following provisions:

"Where grading is proposed on any parcel having an average natural slope of ten percent or greater, or which is zoned Residential Conservation (RC) ... the grading must be confined per this Chapter and limited to the minimum grading necessary to provide for a house, driveway, garage and limited level yard. The ungraded terrain must be left in its natural form for the remainder of the site. All hillside/arroyo grading shall conform to the following general requirements:

- 1. The overall shape, height or grade of any cut or fill slopes shall be developed utilizing contour grading in concert with existing natural contours and the scale of the natural terrain of the site.
- 5. Where any cut or fill slope exceeds one hundred feet in horizontal length, the horizontal contours of the slope shall be developed in concert with existing natural contours.

6. The area of a site proposed to be graded shall be that which fits into the natural terrain and which allows for a minimal amount of grading. The ungraded area must be left in its natural form for the remainder of the site. No native vegetation shall be removed and no non-native vegetation shall be introduced or development of any kind shall be allowed within hillside areas not included as part of the graded pad area. ...

(emphases added)

That last quoted provision practically precludes any extensive grading outside the pad area.

For the present project, while the pad sizes for the two RC zone lots, Lot 1 (pad size 20,881 sq. ft.) and Lot 2 (pad size 20,606 sq. ft.), as shown at p. 4 of the staff report, are consistent with the limitations (21,000 sq. ft.) of 17.28.020 sub paragraph 9, the area of proposed grading, especially for Lot 1 where most of the proposed graded area is outside the pad area, is grossly excessive, far beyond anything necessary, and fails to fit into the natural terrain. One need only look at Exhibit 9 "Proposed Grading Plan", at p. 29 of the staff report, to confirm this. One sees there numerous straight lines indicating (at 5 foot contour intervals) grading cutting across slopes, with many of the lines representing horizontal contours far in excess of 100 ft. and not "in concert with existing natural contours". In general much of the area proposed to be graded outside the pads is not necessary, does not fit into the natural terrain and does not minimize the amount of grading and therefore violates several provisions of the Grading Code. This graded area needs to be reduced and the open space easement area concomitantly increased, in conformity to the grading code.

It is true that Approval Condition 8 states "Precise grading plans shall meet the adopted standards found under Section 17.28.020 of the Hillside/Arroyo Grading.", but the rough grading plans shown in the staff report are so grossly off those standards that it is an abuse to rely on said Condition 8 to meet the said adopted standards.

Regarding the open space easement area on Lots 1 and 2, the cited Proposed Grading Plan has a notation for part of the Lot 1 area that says "Provide planting on natural slope for erosion control". However, we could not find any approval condition related to planting in the open space easement areas. Those areas have

been trashed of much of their native vegetation by past discing. There needs to be added an approval condition regarding planting and maintenance of native (and only native) vegetation in those areas, in conformity with the Grading Code's requirements in 17.28.020.6 quoted above, and adding to Approval Condition 9. Without adequate such explicit conditions, the answer to CEQA Initial Study's question 6b "Result in substantial erosion or loss of topsoil" would have to be "Potentially significant impact". The mere reference in the Initial Study's answer to Title 17, without explicit enforcement provisions in project approvals, is insufficient. Moreover, the Initial Study's claim in answer to question 6c that "As designed the project complies with all of development standards of Title 17 -Grading Code" is false. There are also, due to the grading, potential impacts from landform alteration, a CEQA concern. Also, the answer to Initial Study question 10b should be "potentially significant impact", because the project does conflict with a land use policy or regulation, namely the Grading code's 17.28.020, that was obviously adopted for the purpose of avoiding or mitigating an environmental effect.

Aside from the defects noted above, this project may be legal, but it is not a good project. One need only look at the steepness of the natural contours around the cul-de-sac serving the eight non-RC lots to see this. Just because it is possible by manipulating the zoning code into allowing 2 RC lots and 8 other lots does not make it a good idea to do so. Achieving the maximum number of lots possible can come with unfortunate trade-offs, as here. But at least the grading code violations noted above need to be fixed.

Please excuse the fact that this letter arrives so close to the time of the CPC meeting, but that is because FRH did not receive prior notice of this project even though we are supposed to receive advance notice of all RC zone projects.

Thank you for your consideration.

Friends of Riverside's Hills, by its Legal Liaison Officer Richard Block

<u>rblock31@charter.net</u> 951-683-8762