

Comment Letter No. 16

1:04 PM 1/25/2012 1:04 PM

From: Mehta-Cooper, Mitra
Sent: Wednesday, January 25, 2012 11:33 AM
To: Nanthavongdouangsy, Phayvanh
Subject: FW: Wine Country Comment ltr
Attachments: Final ltr to Planners.doc

Wine Country EIR Comment Letter.

From: Jim Mitchell [<mailto:sierraclubsmg@gmail.com>]
Sent: Wednesday, January 25, 2012 11:17 AM
To: Mehta-Cooper, Mitra
Cc: Bob Audibert; Fred Bartz; Jerri Arganda; Laurie Webster; Lynn Davis; Meryle Hammatt; Pam Nelson; Paul Chuberka; Teri Wagner
Subject: Wine Country Comment ltr

Mitra, the Sierra Club Santa Margarita Group comment letter on the Wine Country expansion is attached. Any questions, please give Pam a call (951-767-2324). I can be reached at 951-764-1290. Thank you very much for your excellent work on this issue.
Jim

} 16.1



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January 25, 2012

Subj: Comments on EIR 524, Temecula Wine Country Expansion

Dear Mitra:

The Santa Margarita Group of the Sierra Club commends the Riverside County Planning Department for striving to create a land-use Plan for the Temecula Valley Wine Country. As residents of Southern California, we know that change to our surroundings can be relentless, rapid and have great impact to our neighborhoods and “backyards”. It is apparent that “having a Plan” as opposed to allowing for growth using the County’s General Plan will be beneficial for both the residential and commercial venues. A plan can create a more viable, welcoming and more aesthetically pleasing area. As an example, a major benefit is clustering of structures resulting in 75% open space.

16.2

It appears that the alternative listed in the draft EIR that calls for a 25% reduction in density would be the best choice, although some quality of life impacts for humans and wildlife need more attention. However, traffic circulation, noise, light, air quality (including greenhouse emissions, GHE), and wildlife corridors are several of the topics that have not been fully addressed. The citizen ad-hoc committee has been clear about their concerns, so the Plan should follow their comments with the greatest seriousness. This will make the future Wine Country a better commercial as well as residential area.

16.3

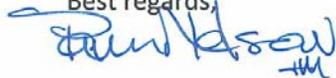
The Sierra Club’s specific concerns and suggestions are as follows:

- 1) Noise issues: concerts and other noise-emitting events should take place inside. 16.4
- 2) Special events: tight regulation of events is needed that space them chronologically and geographically making cumulative impacts less. 16.5
- 3) Lighting needs to be limited with the bulk of lighting turned off after tasting hours 16.6
- 4) The Plan should be implemented in phases as infrastructure is created (sewage and traffic circulation) 16.7
- 5) Air quality and GHE addressed through shuttles off-site, next to the freeway, on weekends and holidays. Special events would require these shuttles. 16.8
- 6) Wildlife corridors, riparian/arroyos and tributaries would be enhanced. Conservation lands are near or adjacent to the wine country footprint. Wildlife passage should be protected. These habitats will be useful for recharge and protection of water supply as well as aesthetics and buffers. 16.9
- 7) Alternative energy that covers a major part of the energy use should be installed in each commercial project. Photovoltaic panels are inexpensive and attractive. Small wind turbines are possible in select sites. 16.10

The draft EIR is a good beginning for a useful Plan for the Wine Country expansion. The main criticism that can be made is that the cumulative impacts are not well addressed. Choosing the Environmentally Superior alternative and phasing in the growth with this Plan could help avoid the difficult conflicts that will arise with a case-by-case project development process that occurs without a plan. 16.11

By keeping the wildlife corridors, arroyos and tributaries intact and buffered, the area will be an aesthetically beautiful place to visit allowing tourists to see the natural character of the area and help the vineyards and wine-making business succeed by aiding natural pollination, recharging the aquifers and mitigating erosion. 16.12

Thank you for giving us the opportunity to comment.

Best regards,


Pam Nelson, Conservation Committee Chair
Sierra Club Santa Margarita Group

Response No. 16

**Sierra Club Santa Margarita Group
Pam Nelson, Conservation Committee Chair**

- 16.1 Responses to specific comments are provided below; no further response is required.
- 16.2 This comment affirms the value of the Project and does not raise any environmental issues related to Draft PEIR adequacy. Therefore, no further response is required. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to *environmental* comments).)
- 16.3 The commenter’s preference for the 25% Reduction Alternative and other opinions expressed are noted and will be considered by the County during Project deliberations. Responses to the concerns regarding traffic circulation, noise, light, air quality (including greenhouse gas emissions), and wildlife corridors are provided in detail in comments and responses below, which fully address the comments provided.
- 16.4 This comment does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. This comment has been duly noted and is presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations. This comment provides a suggestion for concerts and other [outdoor] noise-emitting events to take place inside a property’s residence or structure. Special occasion facilities noise, and other stationary noise sources, are reduced and mitigated by compliance with existing policies and regulations, as well as Mitigation Measures LU-1, and NOI-3 through NOI-6, which require noise studies, a noise control plan, a review by the Office of Industrial Hygiene, and noise-attenuation measures that are regulated on a case-by-case basis as implementing projects are proposed within the Project boundary. No further response is required. (*Browning-Ferris Indust. of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 (where a general comment is made, a general response is sufficient).)
- 16.5 This suggestion does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. This comment has been duly noted and is presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations. Special occasion facilities noise, and other stationary noise sources, are reduced and mitigated by compliance

with existing policies and regulations, as well as Mitigation Measures LU-1, and NOI-3 through NOI-6, which require noise studies, a noise control plan, a review by the Office of Industrial Hygiene, and noise-attenuation measures that are regulated on a case-by-case basis as implementing projects are proposed within the Project boundary. No further response is required. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to environmental comments..))

16.6 This comment does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. This comment has been duly noted and is presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations. The Draft PEIR addresses this issue in Chapter 4.1 *Aesthetics, Light & Glare*, pages 4.1-17 to 4.1-20. As part of the Project Development Standards, all exterior lighting, including spotlights, floodlights, electric reflectors and other means of illumination for signs, structures, landscaping, parking, loading, unloading and similar areas, shall be focused, directed, and arranged to prevent glare and direct illumination of streets or adjoining property. All non-essential lighting shall be operated by a timer and shall be turned off at the close of business. All implementing projects will be required to comply with the County Ordinances No. 915 and 655. No further response is required. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to environmental comments..))

16.7 This suggestion does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. This comment has been duly noted and is presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations. The Draft PEIR indicates that the Project will be phased over a 20+ year period, as noted on page 3.0-15 of the Draft PEIR. Any implementing project will be required to comply with existing regulations, measures, and policies. However, this is a Program EIR and implementing projects will be required to comply with the Project requirements and Mitigation Measures NOI 1-7 at the time of project development. Since the various implementing projects are not known at this time, it will be difficult to determine the nature, scale, location, and impacts of those projects at this point in time. No further response is required. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to environmental comments..))

16.8 This suggestion does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. This comment has been duly noted and is presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations. The Draft PEIR addresses air quality and GHG issues in Chapters 4.3 and 4.7, respectively as well as

Mitigation Measure GHG-2. Mitigation Measures TRF-2 specifically indicates consideration of a shuttle for special events, pursuant to the required Traffic Management Plan. The Project is a community plan area (programmatic EIR) in which the County has little or no control over operations, nor timing of each individual implementing project. Each implementing project will be regulated and administered on a case-by-case basis. The Project requires compliance with regulations, policies, and measures, which serve to reduce vehicle trips and GHG emissions as described in Responses to Comments letter No. 11 and in Section 4.3, *Air Quality*, in the Draft EIR. Detailed trip reduction mitigation measures such as requiring use of shuttles is not feasible for this programmatic level EIR. No further response is required. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to *environmental* comments).)

- 16.9 The comment appears to summarize benefits of the Project and opportunities to preserve or protect wildlife corridors, and does not raise any significant Draft PEIR adequacy issues. Wildlife corridors are addressed in Draft PEIR Chapter 4.4 *Biological Resources*, which addresses the MSHCP and related linkages and corridors, as well as existing drainages. Wildlife corridors will be regulated with MSHCP compliance as future projects are implemented. It should be noted that the Project will reduce overall density compared to existing General Plan and zoning classifications. Also refer to Responses to Comments letter No. 2 and 5, and response 16.12. No further response is required.
- 16.10 This suggestion does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. This comment has been duly noted and is presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations. The Draft PEIR addresses air quality and GHG issues in Chapters 4.3 and 4.7, respectively. Mitigation Measure GHG-2 includes options as noted in Draft PEIR Appendix E, including use of alternative energy sources. No further response is required. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to *environmental* comments).)
- 16.11 This comment states an opinion regarding the Draft PEIR but does not provide any specific Draft PEIR adequacy issues other than the general statements noted. The Draft PEIR addresses alternatives in Chapter 6. In addition, cumulative impacts are addressed in each individual topical area in Chapter 4. The comment does not raise any significant Draft PEIR adequacy issues or environmental issues. Therefore, no further response is required. (*Browning-Ferris Indust. of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 (where a general comment is made, a general response is sufficient).)

- 16.12 This comment does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. Mitigation Measure LU-1, AES-1 through AES-3 will assist in maintaining the Wine Country rural character. Refer to Responses to Comment Letter No. 2 and 5 for detailed discussion regarding biological issues. Mitigation measures and applicable existing regulation regarding water quality and erosion are provided in the Draft EIR Section 4.9, *Hydrology and Water Quality*. Therefore, no further response is required. (*Browning-Ferris Indust. of California, Inc. v. City Council of the City of San Jose* (1986) 181 Cal.App.3d 852 (where a general comment is made, a general response is sufficient.))