

Comment Letter No. 19

7:34 AM 2/2/2012 7:34 AM

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**From:** Mehta-Cooper, Mitra  
**Sent:** Thursday, February 02, 2012 7:26 AM  
**To:** Nanthavongdouangsy, Phayanh  
**Subject:** FW: Letter  
**Attachments:** 20120201155207732.pdf

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**From:** Carrie [<mailto:carrie@temeculacvb.com>]  
**Sent:** Wednesday, February 01, 2012 6:09 PM  
**To:** Mehta-Cooper, Mitra  
**Subject:** Letter

Dear Mitra:

Please find a letter from our Chairman of the Board and our President & CEO.

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

Thank you,

Carrie Penny | VP of Finance & Operations



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} 19.1

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February 1, 2012

Mitra Mehta-Cooper  
Riverside County, TLMA Planning Department  
4080 Lemon Street, 9<sup>th</sup> Floor  
P.O. Box 1409  
Riverside, CA 92502-1409



This letter is offered in response to the Draft Program Environmental Impact Report (EIR No. 524) Wine Country Community Plan dated December 1, 2011.

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This letter has been approved by the Board of Directors of the Temecula Valley Convention and Visitor's Bureau. The TVCVB promotes tourism within the Temecula region and represents over 130 member companies from an industry accounting for more than 6,000 area jobs and a total direct economic impact of over \$550 million. The organization manages an annual budget of over \$1.3 million funded largely by a Tourism Business Improvement District assessment (an assessment on transient lodging). The TVCVB employs 8 full-time and 3 part-time staff, and is served by more than 35 volunteers. For governance and strategic direction, the TVCVB relies on a Board of Directors consisting of 21 business leaders representing many distinct categories, including Lodging, Wineries, Casinos, Ballooning, Tours and Transportation, Special Events, and other key hospitality interests.

} 19.3

**General Comments.** Wine Country, and the visitor's perception of Wine Country as a desirable element of the overall destination, is central to the continued success of the entire tourism industry within the Temecula region – not just to the success of the businesses within the geography covered by the Wine Country Community Plan. The TVCVB requests that the County take into account the significant and positive impact of tourism and weigh it accordingly as it considers the various viewpoints associated with the Plan.

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**Comments on specific EIR items.**

**AQ-7** *The County shall work with the Winegrowers' Association and their partners to promote alternative modes of transportation...*

While the Winegrowers' Association (TVWA) is a logical organization to confer with, its focus is primarily on wineries and its governing body is comprised exclusively of representatives from wineries and vineyards. The TVCVB's Board of Directors is comprised of a cross section of hospitality industry categories which must include, per its bylaws, Tours and Transportation, Small Wineries, Large Wineries, Special Events, several lodging categories, and many other specific industry segments. Accordingly, the TVCVB has a broader perspective and more relevant expertise regarding modes of transportation to, from, and within the Temecula Valley. The TVCVB requests that the County alter AQ-7 to specifically name the TVCVB as an organization the County will work with regarding modes of transportation.

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**4.14 Traffic and Circulation.** TVCVB notes that the EIR has a strong bias towards maintaining the rural character of Wine Country in part by keeping traffic signals to a minimum within the project. The tourism industry strongly supports this approach, as the rural character of the area is an important aspect to maintaining its allure to visitors.

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**4.12.5 PROJECT DESIGN FEATURES**

*1. The Project's amendment to County Zoning Ordinance No. 348 will require that the minimum lot size for special occasion facilities be 10 acres in the WC-WE zone, 20 acres in the WC-W*

} 19.7



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zone, and 100 acres in the WC-E zone and a maximum of 5 guests shall be permitted per gross acre for these facilities.

19.7  
cont

The TVCVB notes that while the number of guests is one of many factors that can have an indirect impact on noise, it is not an appropriate criterion for two reasons. First, the number of guests is less likely to impact noise levels than other criteria that are relatively easy to define and measure. For example, an event with 250 guests that is held indoors is likely to create far less noticeable noise outside the property than an event with 25 people that includes a sound system outdoors. Second, the number of guests does have a direct and significant impact on the ability of a winery to be financially successful. Therefore, the "number of guests" criterion has a strong negative impact on the wineries without accomplishing the desired goal of avoiding unacceptable noise levels, and TVCVB strongly recommends that the criterion be a more direct measure of the impact and NOT be the number of guests.

19.8

**TRF-2.** This section states that "*The County shall require wineries and equestrian facilities to prepare a Traffic Management Plan (TMP) for County's review and approval for large special events, including but not limited to weddings, concerts, festivals, and equestrian events. The TMP shall provide detail.*"

19.9

The TVCVB recognizes the value of this requirement not only in protecting the interests of area residents and businesses, but also in ensuring a positive visitor experience. However, if it is not well-defined or if the approval process is inefficient, the TMP requirement could seriously hamper a business' ability to hold events. Therefore, we request that the TVCVB be consulted in the development of the practices associated with the TMP program.

**NOI-3.** This section states in that "*The hours of operation for tasting rooms associated with wineries shall be limited to 9:00 a.m. to 7:00 p.m. Monday through Sunday in the Wine Country,*" and also that "*Mechanical equipment including but not limited to, de-stemming, crushing, and refrigeration equipment shall be enclosed or shielded for noise attenuation. Alternatively, the proponent may submit a Noise Study prepared by a qualified acoustical analyst that demonstrates that the unenclosed/unshielded equipment would not exceed the County's allowable noise levels.*"

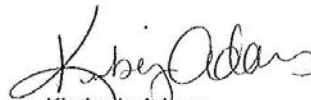
Regarding the hours requirement, many wineries conduct operations outside of these hours that are either occasional (like evening events utilizing the tasting room) or are low-impact (like shipping and receiving in early hours). It is important to the operations of wineries that the hours requirement does not impede these activities. Regarding the requirement related to equipment noise, the nature of agricultural operations is that some equipment use occurs during a particular season and is inherent to the process. For example, it is possible that the use of a tractor near the edge of a property or the few-times-a-year use of a de-stemmer could contradict the general allowable noise level. It is important that the requirements for noise control take into account the cost of compliance, the historical precedence of farming, and the frequency of the noise generation. TVCVB would therefore ask that the county consider whether some allowance should be made for certain seasonal activities that are inherent to farming in order to avoid an excessive burden to farming operations.

19.10

Thank you for considering the input of the Temecula Valley Convention and Visitors Bureau,



John Kelliher  
Chairman of the Board



Kimberly Adams  
President & CEO

**Response No. 19**

**Temecula Valley Convention and Visitors Bureau  
Carrie Penny  
Vice President, Finance and Operations**

- 19.1 Responses to specific comments are provided below; no further response is required. Refer to Attachment A: *Temecula Valley Wine Country Community Plan Planning Commission Final Recommendations and PEIR No. 524 Determination.*
- 19.2 Responses to specific comments are provided below; no further response is required
- 19.3 This comment does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to environmental comments).)
- 19.4 CEQA does not require an analysis of economic or social impacts in the PEIR. However, this comment has been duly noted and will be presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations.
- 19.5 Mitigation Measure AQ-7 will be revised to include the Bureau as an organization for the County to work with to promote alternative modes of transportation.
- “AQ-7 The County shall work with the Winegrowers’ Association, the Temecula Valley Convention and Visitor’s Bureau, and their partners, to promote alternative modes of transportation, such as shuttles, cable-cars, trolley, etc. In addition, where feasible, the County shall work with the local transit provider – RTA – by adding or modifying existing transit service to enhance service near the Project site. This will encourage the use of transit and therefore reduce vehicle miles traveled (VMT). Unincorporated Riverside County hosts one Metrolink transit station; the County shall collaborate with in the neighboring cities to expand connections to this station as well as other Metrolink stations which will increase ridership and decrease vehicle miles traveled (VMT).”
- 19.6 This comment affirms the Project design concept and is presented in this Comments and Responses document for decision makers to evaluate as part of their Project deliberations. This comment does not identify any specific concern

with the adequacy of the Draft PEIR or any environmental issues. Therefore, no further response is warranted. (State CEQA Guidelines § 15088(a) (CEQA requires that a lead agency respond to environmental comments).)

19.7 This requested modification to Ordinance No. 348 will be considered by the County decision-makers during Project deliberations, noting that it may be more enforceable to regulate exterior noise impacts based on the siting and design of special event facilities and conditions stipulated for any outdoor sound amplification. Refer to Attachment A: *Temecula Valley Wine Country Community Plan Planning Commission Final Recommendations and PEIR No. 524 Determination*.

19.8 The County of Riverside is the governing body that will oversee implementing projects within the Project area. The County will review and approve Traffic Management Plans that are proposed with large special events per County Zoning Ordinance No. 348. 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. Mitigation Measure LU-1 has been modified to include TVCVB on the interest list for discretionary development applications within the Wine Country, which would afford TVCVB the opportunity to review and comment upon implementing projects, required technical studies and proposed conditions of approval.

Add a fifth bullet to LU-1:

LU-1 All implementing projects (ministerial and discretionary) within the Project boundary shall be required to:

- Apply for and obtain a Change of Zone (CZ) to benefit from the implementing zones of the Wine Country Policy Area. As part of the review process, the County shall conduct a project-specific CEQA analysis for the CZ Application. Depending upon the location of the implementing project, Planning staff shall require the project proponent to conduct the necessary studies (e.g., Archeology, Geology, Biology, Hydrology, etc.). Depending upon the findings of those studies, Planning staff shall recommend that a restrictive zoning classification (such as an open space zone) be placed on areas where sensitive resources require protection.
- Apply for and obtain the necessary grading permit. Such grading permit shall go through the appropriate environmental analysis and identify the necessary mitigations, if any (e.g., cultural monitoring during grading, biological restoration, etc.), prior to approval of the grading permit.

- Apply for and obtain the necessary building permit. The County shall ensure the necessary reviews of building permits by the Riverside County Flood Control and Water Conservation District (RCFCWCD), Environmental Programs Division (EPD), County Archeologist, County Geologist, etc.
- Comply with the MSHCP and applicable resource agency regulations pertaining to the protection of biological resources and existing jurisdictional drainage features. Applicants for such implementing projects shall reference the current MHSCP criteria (biological objectives and requirements for any applicable Conservation Area/Criteria Cell or linkage), conduct an MSHCP consistency analysis, and prepare a Jurisdictional Delineation where onsite drainages exist and obtain applicable permits/approvals from the U.S. Army Corps of Engineers, California Department of Fish and Game, Regional Water Quality Control Board and/or U.S. Fish and Wildlife Service.”
- “Utilize the County’s notification mailing list with the intent of creating additional opportunities for public input on site-specific design and mitigation requirements to minimize land use conflicts and related issues.”

19.9 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.

19.10 Mitigation Measure NOI-3 applies to stationary equipment that generates noise potentially in excess of County noise requirements, and does not apply to standard agricultural equipment such as tractors, nor does it apply to manual activities. The mitigation measures (NOI-1 through 7) also provide site-specific flexibility by allowing the landowner/operator to demonstrate consistency with County requirements. Refer to Attachment A: *Temecula Valley Wine Country Community Plan Planning Commission Final Recommendations and PEIR No. 524 Determination*.