

Comment Letter No. 25

10:51 AM 1/23/2012 10:51 AM

From: Mehta-Cooper, Mitra
Sent: Monday, January 23, 2012 7:13 AM
To: Nanthavongdouangsy, Phayvanh
Subject: FW: Wine Country Community Plan Draft EIR
Attachments: Comments on Wine Country Plan EIR.docx

Good morning Phay:

For Wine Country EIR Public Comments.

Mitra

From: JOSHUA GOTTHEIM [<mailto:joshuaq1@msn.com>]
Sent: Saturday, January 21, 2012 11:51 AM
To: Mehta-Cooper, Mitra
Cc: Roberts, Ron; Terilee; district3@rcbos.org
Subject: Wine Country Community Plan Draft EIR

Mitra -- I appreciate your courtesy in extending the Draft EIR comment period to February 2nd. Attached are my comments. Please shoot me back an e-mail to confirm that you received this and can open the attachment. Thanks.

} 25.1

Josh Gottheim
37455 Avenida Bravura
Temecula, CA 92592

Comments on Wine Country Plan Draft EIR

- 1. Multi-Use Trails. The project Design Guidelines state: “A design for ultimate De Portola Rd. Trails and Landscaping has been prepared, but must wait to install the improvements until Flooding Problems are Resolved and the Road Widened.” } 25.2
- a. The Draft EIR Hydrology and Water Quality section fails to acknowledge, describe or mitigate the significant flooding issues that affect De Portola Road every year during the rainy season. The road becomes impassable and presents a safety hazard along with damage to property through erosion, sediment deposition and inundation. This is not acceptable for the second major wine country road in the plan (second in number of wineries only to Rancho California). Development under the proposed plan will bring additional traffic and visitors to the affected areas. This is a significant impact which needs to be addressed in the EIR and mitigated by the project. CEQA does not allow problems of this significance to be ignored or deferred to be handled later. } 25.3
- b. The parks and recreation analysis in Chapter 4.13 of the DEIR is not adequate. After citing the County’s park standard of 5 acres per thousand residents (i.e. nearly 30 acres required for the planning area’s 5,700 population), the DEIR admits that there are no public parks currently in the planning area and none are included in the plan. Yet the impact is called “not significant” and the obvious mitigation – which would be to include a park in the plan – is not considered or adopted. The DEIR downplays the lack of parks with several misleading arguments, such as pointing out that there are parks in the neighboring City of Temecula. Yet no analysis is made of whether the City has excess parks to serve its own population of 100,000 plus, let alone accommodating the needs of unincorporated County residents. What is the City’s view of further burdening City parks to alleviate the County’s own park shortfall? The text mentions that the County collects development fees for parks, and these fees have been cut recently despite the existing park shortage. The fee reduction should be recognized as worsening the already significant impact. The DEIR also attempts to cite the “nearby” Lake Skinner and Diamond Valley Lake facilities as substitutes for local parks. Lake Skinner is a regional park more than ten miles away by road from most of the planning area residents, and entry is by fee only, \$6.00 on most days and \$8.00 on holidays. As such, it does not substitute for a local park or playground where kids can drop by and play for an hour before or after dinner. The swim/rec center at DV Lake is likewise 24 miles away by road, per Google Maps directions. } 25.4
- c. The DEIR appears to rely upon the bike and multi-use trails identified in the project design guidelines to satisfy recreational needs. The trails would be a welcome addition to the area, but would not be a substitute for playgrounds and neighborhood parks. Unfortunately, the plan’s commitment to the trails is too weak to be relied upon. As noted above, the trails for De Portola road are put off indefinitely until flooding and road widening issues can be addressed. Even for the Rancho California Road trails, right of way has not been acquired and no source of funding has been identified or committed. Will the reduced Quimby park fees be used to fund the trails? } 25.5

- d. Regarding the timing of implementing trails, the DEIR states: "Implementing projects facilitated by the Project are expected to occur over a 25-year period." Talk about a non-commitment! Those of us who have attained middle-age or better might hope to see the trails put in during what remains of our lifetimes. Clearly there is no assurance that our children, be they newborns or teens, will see any benefit from these facilities before they grow up and move away to college and careers. To put off implementation of the trails for a generation is to say, in effect, that these trails are merely an afterthought and are not taken seriously by the County as a necessary or important part of the Wine Country plan. To the extent the trails are to be counted as reducing or avoiding what would otherwise be a significant impact on recreational facilities, CEQA does not permit deferring the solution so that it lags decades behind creation of the problem. Either the impact should be declared significant, or funding should be identified and the time frame for implementation should be shortened to a reasonable period (five years or less). } 25.6
- e. Even if the implementation time frame is shortened, a near-term temporary solution should be incorporated into the plan, specifically adding a paved shoulder or lower classification bike lane within existing right of way along De Portola Road and Glenoaks Road. Because of the beauty of Wine Country, bicyclists can be seen at all daylight hours along the main roads, especially the scenic loop created by De Portola, Glenoaks, and Rancho California. Unfortunately from a safety standpoint, this is a disaster waiting to happen as cyclists share these two-lane country roads with cars travelling 55 mph. Most of the route has no paved shoulder, so that there is not sufficient roadway width to accommodate two cars passing in opposite directions together with a cyclist. The DEIR should acknowledge this serious existing traffic hazard and provide immediate interim mitigation in the form of at least a paved shoulder along these main roads. Also, the plan should include a future multi-use trail along Glenoaks Road and/or Monte de Oro linking the trails already planned for De Portola and Rancho California Roads. } 25.7
- 2. Road Improvements. Monte de Oro.
 - a. Table 4.14-9 shows that the "Existing plus Project" traffic will deteriorate level of service at the intersection De Portola and Monte de Oro (#56) to less than acceptable (LOS "F"). Yet Table 4.14-11 indicates that the same intersection under "Future plus Project" conditions would operate at an acceptable LOS "C". Please explain in plain English the reason for the difference. } 25.8
 - b. What future improvements if any are assumed to De Portola and Monte de Oro? Currently, Monte de Oro between De Portola and Rancho California is paved only on the westerly half of this road segment. The eastern half is unpaved, and includes a hazardous unimproved gulley crossing that is unsafe during dry weather and flooded and impassable after rain. Paving of the full length of Monte de Oro should be included in the plan to mitigate the impact of project traffic on this hazardous roadway segment. Please identify the funding source and timing for implementation of this urgently needed improvement. } 25.9

Response No. 25

Joshua Gottheim

- 25.1 Responses to specific comments are provided below.
- 25.2 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.)) The reference is to the Project Design Guidelines. The Design Guidelines acknowledge the need to resolve flooding issues and provide an ultimate improved road section prior to implementing the trails plan, in order to construct a trails system consistent with the ultimate road network, avoid damage to the trail during floods, and avoid damage or unnecessary costs for reconstructing the trail as part of future road widening. This is a phasing issue.
- With respect to the PEIR's analysis of flooding issues, these are addressed at a programmatic level in Chapter 4.9 *Hydrology and Water Quality*. The comment notes an existing condition, although there is no information provided to suggest that the Project would aggravate this condition. In fact, through the County's development review process, the Project's Design Guidelines, and the PEIR mitigation measures, Wine Country buildout is anticipated to improve existing drainage problems by incrementally implementing local and regional drainage solutions. The identification and mitigation of regional drainage issues is also under the jurisdiction of the Riverside County Flood Control and Water Conservation District.
- 25.3 This comment does not identify any specific concern with the adequacy of the Draft PEIR or any environmental issues. The Draft PEIR addresses park and recreation issues at a programmatic level. Traditionally, park fees have been used to provide for local and regional park and open space facilities in urban and suburban settings. Due to the rural nature of the Project area, residents, equestrians, bikers, and visitors have numerous opportunities for public and private recreation on the trails, open spaces around wineries and recreation venues in and around the Project vicinity. The Project includes adoption of an integrated Trails and Bikeways System component, which will further enhance the region's recreational opportunities and connect the region's internal and external destination places. Neither the City nor the County's Parks and

Recreation Department provided any information to suggest that the Draft PEIR discussion is inadequate.

25.4 The Draft PEIR does not rely solely upon the Trails and Bikeway Systems component to mitigate park and recreation impacts. As discussed in Draft PEIR Chapter 4.13, Impact 4.13-5, the Project also reduces park and recreation impacts through payment of park fees, and provision of site-specific recreational amenities through the County's development review process. It should also be noted that the Project substantially reduces buildout population compared to the "No Project" condition (as discussed in Draft PEIR Chapter 6 *Alternatives to the Proposed Action*). Furthermore, provision of neighborhood recreation facilities is more often associated with larger master planned residential developments, which are contrary to the overall purpose and intent of the Project, which is to preserve the rural nature of the Wine Country.

The County is weighing the various options to fund the proposed circulation system improvements needed to address potential circulation impacts. The County currently imposes development impact fees on projects located within the Southwest Area Plan. The County is investigating the feasibility of funding mechanisms as the creation of a Community Facilities District, the use of a Community Service Area assessment, individual assessments, and fee imposed on implementing projects as conditions of approval, as noted in Mitigation Measure PSU Rec-1.

25.5 Refer to Response to Comment 24.4. For a trails system of the size contemplated (a 18,990-acre study area), it is not reasonable to implement the entire network in advance of the development that generates the fees necessary for financing and construction. Backbone infrastructure such as a trails network are typically implemented concurrent with adjacent development (where right-of-way or trail construction is provided on the "half-width" for trails along a property boundary, or in entirety for trails traversing a property). As noted above, the County is evaluating funding mechanisms which could allow acceleration of the trails system and/or other infrastructure elements.

There are existing equestrian crossings as well as a recently constructed roundabout at Anza Road and Rancho California (to ensure pedestrian safety while allowing traffic flow) which provide examples of how the County is committed to phasing in recreational infrastructure with growth. A sample of existing equestrian crossings and the timing for the completion date follows:

1. De Portola Road and Belle Chain Loop (W), 4/1993

2. De Portola Road and Belle Chain Loop (E), 4/1993
3. De Portola Road N/E of Pauba Road, 4/1993
4. De Portola Road and Camino Del Vino, 4/1993
5. De Portola Road and Avenida Bravura, 9/1997
6. Glenoaks Road and Camino Del Vino, 9/1997
7. Rancho California and Calle Contento, 9/1997
8. Anza Road and Los Nogales Road, 4/2011
9. Rancho California E/O Anza Road, 5/2012

This comment will be considered by decision makers as part of Project deliberations.

- 25.6 The decision makers will consider the request for interim trails improvements as part of Project deliberations. Refer to above responses regarding the County's current efforts to develop funding mechanisms both for the bikeways and for the transportation system, in Mitigation Measure Nos. PSU Rec-1 and TRF-3, respectively.

The suggestion for a future multi-use trail along Glenoaks Road and/or Monte de Oro is not related to the adequacy of the Draft PEIR, but will be considered by decision makers as part of Project deliberations.

- 25.7 The Existing Plus Project condition is unmitigated, and does not assume implementation of the County's backbone circulation system for the Wine Country. The Future Plus Project condition, although it includes additional background traffic, also includes Project mitigation and implementation of the County's circulation network, which creates a more efficient circulation system than existing conditions (refer to discussion on Draft PEIR page 4.14-25).

- 25.8 – 25.9 Monte De Oro Road and De Portola Road are proposed as two-lane roads in the Project area. These improvements are being incorporated into the infrastructure funding mechanism being developed for the Project, which will also include a phasing program. In the interim, the County will implement the mitigation measures - TRF 1 through 5 - identified in Section 4.15 of the Draft PEIR and require fair-share improvements from all implementing projects proposed along these or other roads in the Project area.