

## GPAC COMMENT WORKSHEET FOR DRAFT GENERAL PLAN AND DRAFT EIR

<b>COMMENTS BY:</b> <b>GPAC – Recommendations Regarding Draft General Plan Circulation Element</b>		<b>DATE:</b> <i>6 December 2010</i>
CHAPTER/ PAGE/ PARAGRAPH	COMMENTS	PROPOSED ACTION FOR GPAC's CONSIDERATION
	<p><b>Increase in Sphere of Influence</b>  <i>Land Use Refinements</i> on page 69 of the Supplemental Traffic Study indicates that the SOI has been increased. See Section 4.1, it states, in part, “The sphere of influence (SOI) has been expanded compared to the boundary at the time the previous analysis was completed.” What increase in the SOI has occurred since 2007? If there has been no increase in the SOI, some of the traffic impacts may have been incorrectly analyzed in the Supplemental Traffic Study because of the assumption of an increased SOI.</p>	See Comments
	<p><b>Development of Mesquite Dunes and JTNP Buffer</b>  Information on page 70 of the Supplemental Traffic Study, Socioeconomic Data, indicates that areas within the Mesquite Dunes and the JTNP buffer will be undeveloped. This is incorrect. What Traffic Analysis Zones (TAZ) were affected by this incorrect assumption?</p>	See Comments
	<p><b>Lower Commercial Intensities</b>  Also on page 70 of the Supplemental Traffic Study it states, “Lower intensities of</p>	See Comments

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	<p>development, more consistent with the current character of the community, have been developed and applied to the various commercial, industrial, and office designations.” However, information in EIR Table 4.10-7 on page 4.10-21, and data contained in Table LU-17 of the Land Use Element state that the city will grow from 1,154,445 square feet of non-residential development to 38,917,800 square feet, an increase of 3271%. The conclusions are not consistent. What conclusions in the recommended roadway network are flawed because of the difference between the lower commercial buildout anticipated by the Urban Crossroads Supplemental Traffic Study and the 39 million square-foot commercial development anticipated by Hogle Ireland in the EIR?</p>	
	<p><b>Additional General Plan Roads</b></p> <p>On page 71 of the Supplemental Traffic Study, it states that the updated traffic analysis estimates trip generation that is only 40% of the trip generation that was calculated in the previously published Urban Crossroads traffic study. Roadway network refinements are discussed in section 4.4. However, the roadway network is generally the same as that recommended by Urban Crossroads in the earlier analysis when the population buildout was anticipated to be 231,702.</p> <p>It appears that, with 40% of the previously anticipated traffic, only minor reductions have been made to General Plan roadway network, including:</p> <p style="padding-left: 40px;">The two-mile long 8-Lane Expressway designation has been changed; it is now proposed to be six lanes.</p>	See Comments

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	<p>The bypass has been rerouted to avoid excessive construction costs anticipated as a result of topography.</p> <p>Moronggo Road between Amboy Road and Indian Trail has been deleted.</p> <p>Collectors, mostly in rural areas, have been deleted. Most of these changes were made to avoid, “crossing major drainage channels and other topographic features that would require costly structures.”</p> <p>However, nine roadways are upgraded. None of these roadway upgrades were deemed necessary as a result of the original Urban Crossroads traffic study which was to accommodate a population of 231,702 residents (and 150% more traffic). Most of these <i>upgraded</i> roadways are in rural areas, areas in which the previous Traffic Analysis anticipated two dwelling units per acre; the Supplemental Traffic Study anticipates one dwelling unit per 2.5 or five acres (a density decrease of 80 or 90%). The upgraded roadways include:</p> <p>Montonya south of SR 62, leading into a sparsely populated rural area and ending two miles south of SR 62 at the JTNP border.</p> <p>The addition of Whitmore Road between Montonya and Lear in the RL 2.5 land use district.</p> <p>Dorth Place south of SR 62, with an ADT of 500. Why is it recommended as a</p>	

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	<p>collector?</p> <p>Lear Avenue extension south of SR 62 across a rural area to provide a second route to Indian Cove Campground. What data supports the need for an alternate to this remote campground? What is the ADT for Indian Cove Road and why is the Indian Cove Road ADT not shown on Exhibit 2-E of the Supplemental Traffic Study?</p> <p>Extension of Shoshone Valley Road a half mile south of SR 62 in an area zoned for one dwelling unit per 2.5 acres and leading to an area zoned for one dwelling unit per five acres. ADT for Shoshone Valley Road north of SR 62 is 300, why is a collector recommended south of SR 62?</p> <p>Extension of Encelia Avenue south of the Stater Bros shopping center to an area zoned for one dwelling unit per acre, leading to an area zoned one dwelling unit per five acres. The existing segment of Encelia has an estimated ADT of 2300, what justifies expanding this roadway leading to a sparse rural area?</p> <p>What is the rationale behind the Urban Crossroads recommendation for these additional roadways with only 40% of the traffic as compared to the previous report in which they were not recommended?</p>	
	<p><b>Special Study Area for Adobe Road</b> Exhibit 4-A on page 75 of the updated Traffic Analysis depicts recommended roadway classifications. This includes a four-lane roadway for Adobe Road between SR 62 and Two</p>	See Comments

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	<p>Mile Road and six lanes north of Two Mile Road. Exhibit 4-B identifies needed improvements to signalized intersections, including those for Adobe Road.</p> <p>Why does the draft Circulation Element identify Adobe Road from SR 62 to the Main Gate as a Special Study Area?</p> <p>There is no discussion in the Urban Crossroad Traffic Analysis regarding the need for the Special Study Area (it does indicate that the previous traffic study recommended Special Study area for Adobe Road between SR 62 and Two Mile Road, but nothing north of that point.)</p> <p>There is no discussion in the EIR regarding the Special Study Area for Adobe Road. Special Study Areas for intersections are discussed on EIR page 4.16-3 but nothing is found in the EIR regarding this status for more than 4.5 miles of Adobe Road designated as Special Study Area.</p> <p>The Circulation Technical Report describes Adobe Road as a Special Study area but provides no technical background or planning reasoning, simply stating, “According to the City Engineer, these areas have been given a special study area designation so they can be studied in the future to better plan their ultimate build-out.” A traffic study is the ultimate tool in determining ultimate build-out, why is this being deferred?</p> <p>Needed intersection improvements are detailed in the Urban Crossroads analysis, pages 73-80. The text sets forth the needed intersection improvements and concludes on page 80, “All other locations analyzed will operate acceptably with the standard lane configuration at the</p>	

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	<p>intersections.”</p> <p>What is the reasoning behind the Special Study Area status for this 4.5 mile segment of Adobe Road if Urban Crossroads has stated that intersections will operate acceptably with the noted improvements? Why is there no discussion as to why the recommendations of Urban Crossroads are not accepted?</p> <p>What data supports the need for a Special Study Area for Adobe Road?</p>	
	<p><b>Inadequate Traffic Study</b></p> <p>The traffic study done for the General Plan was done in 2007 and was based on a population build-out of nearly a quarter of a million residents. EIR analysis of transportation and traffic on EIR page 4.16-1, indicates that Urban Crossroads prepared a 2010 supplemental traffic analysis. However, <b><u>data provided in the Circulation Element is based on the 2007 study as there is no reference to the updated, supplemental study (other than in the appendix) in the draft Circulation Element.</u></b> Traffic volumes identified as “existing” in Table 4.16-3 of the EIR cite the 2007 Urban Crossroad Traffic Study—not the 2010 supplemental study—as the source. The Circulation Element is based on a build-out of 231,702 residents and therefore inadequately addresses traffic impacts of the city.</p>	See Comments
	<p><b>Development of 38,917,800 s.f. of Commercial Area</b></p> <p>The General Plan anticipates a 3000%+ increase in commercial and industrial development in the city but data is not provided to support this conclusion. If the increase in development</p>	See Comments

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	is not reasonable, the roadway network is excessive and will include unnecessary improvements causing wasteful public and private investment. The GPAC recommends that the non-residential growth forecast be revised or substantiated. If it is revised, the roadway network should be revised accordingly to ensure that the roadway network is not over-built.	
	<b>New Visitor Center, Page 5</b> JTNP is currently planning to update their visitor center to include a cultural center. This will be a major draw to the area and will increase traffic to the city generally and the visitor center location specifically. The GPAC recommends discussion in the circulation element regarding the new visitors center.	See Comments
	<b>Casino Not Referenced in Circulation Element</b> The Twentynine Palms Band of Mission Indians own 160 acres at the southeast corner of Baseline Road and Adobe Road and have plans to construct a casino, RV park, and shopping center at some future point. Such a development will have far-reaching effects on the City’s roadway network. However, the potential for this development is not referenced in the	See Comments

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	Circulation Element (or in any other draft General Plan Element) nor is it discussed in the draft EIR. Impacts created by this possible future development have not been analyzed or planned for in the General Plan. The GPAC recommends that such impacts be considered and that appropriate goals, policies and implementation measures be included in the new General Plan.	
	<p><b>Joshua Tree National Park</b> The Joshua Tree National Park requests that references be either United States National Park Service or National Park Service.</p> <p>Text on page six indicates Indian Cove Road provides “full access” to the National Park; this is incorrect; Indian Cove Road provides vehicular access only to Indian Cove Campground. Utah Trail is the only road within the City providing full access to the National Park. Canyon Road provides vehicular access to 49 Palms Wilderness Area/hiking trail with its terminus in the National Park at the 49 Palms Oasis parking lot.</p>	See Comments
	<p><b>Implementation Policy CI-1.14 (p. CI-32)</b> The Implementation Policy indicates that the City and JTNP should co-operate on the maintenance and enhancement of Canyon Road. However, at this time, the Joshua Tree National Park does not agree with this draft policy because Canyon Road is outside the National Park boundaries. The GPAC recommends that the policy be removed.</p>	See Comments

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	<p><b>Development of MBTA to Promote Tourism</b>            Goal CI-6 should include a program to work with the MBTA to develop routes to accommodate tourists which could decrease traffic and facilitate visitation of local amenities. The program could also include seeking federal money to support such routes.</p>	See Comments
	<p><b>Signalized Intersections</b>  <i>Neither the EIR nor the General Plan provides data that supports the recommended traffic signals. Additionally, there are no policy statements related to trigger points for signal construction.</i></p> <p>Traffic signals proposed in the Draft General Plan are nearly identical in quantity and location as compared to Urban Crossroads' recommendations, based on their 2007 study, except for changes caused by realignment of Amboy Road bypass and the addition of a signal at Mesquite Springs Road and SR 62.</p>	

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	The Urban Crossroads traffic study was erroneously based on a build out of 231,702 residents. However, the same number of signalized intersections are proposed in the draft General Plan for a build-out of 104,224, as was proposed according to Urban Crossroads for a build out of 231,702 residents.																													

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	<b>Seek Designation as Scenic Highway/Byway</b> Goals should be created to include a regional perspective to reflect the City’s optimum location for travel to/from the many scenic rural assets in California’s deserts of from the Mexican border to the Sierra Nevada.	See Comments
	<b>Rural Standards</b> Implementation Policy 3.4 states that the city will implement an alternative reduced improvement standard for local streets in low density residential areas but no meaningful policy direction is provided. The GPAC recommends non-paved local roads in Rural Living (RL) districts and in RS districts with densities of one dwelling unit per acre or one dwelling unit per 2.5 acres. Additionally, curb & gutter and sidewalks would not be required in one-acre, 2.5 and 5-acre land use districts.	See Comments
	<b>Low Impact Design (LID) Standard for Flood Control</b> Implementation Policy CI-5.3 for flood control channels should include the State (and federal) Low Impact Design standards.	See Comments

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	<p><b>Utah Trail JTNP Entrance</b> The GPAC recommends that the Utah Trail entry to the National Park be identified as a special study area for development of suitable standards to maintain the open view shed of the park entrance.</p>	See Comments
	<p><b>The GPAC recommends the following miscellaneous edits:</b></p> <p>Typo on page 30 in Implementation Policy CI-1.3: strike the word “will”.</p> <p>Page 37, the Pinto Mountains are not north of the city. Mountains north of the city should be identified as the Bullion Mountains.</p> <p>Text in Implementation Policy CI-6.1 (p. CI-35) regarding MBTA “Agency” should be changed to “Authority” for consistency.</p> <p>Discussion on page CI-20 of the Circulation Element indicates that Morongo Road “represents a substantial north-south street connecting Amboy Road to Twentynine Palms Highway. However, on the Circulation Plan, Morongo Road has a gap between Sunnyslope Drive and Two Mile Road. Either the text or map should be corrected.</p> <p>Replace the word “assistance” with “disturbance” in Implementation Policy 1.18, p. CI-32.</p> <p>Replace the word “enhancing” with “preserving” in Implementation Policy 1.19.</p>	See Comments

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Page CI-18	Twentynine Palms Highway 1 <sup>st</sup> paragraph. Hwy 62 does not serve as the City's only access route. Amboy Road and there is access through the JTNP as emergency egress.	
Page CI-19	Downtown Circulation and Parking – Recommend on street parking in the downtown area on both sides of the street. Currently, on street parking for the downtown area is limited. Studies do show as suggested by the Smart Growth Manual by Andre Duany & Jeff Speck that quote: “on street parking provides many benefits. It slows down drivers who are instinctively watchful of other cars in the roadway; it protects pedestrians from traffic with a thick steel barrier of cars along the sidewalk; it reduces the demand for on-site parking, decreasing the amount of parking lot pavement; and it increases sidewalk activity as drivers walk from their car to their destination. For these reasons, on-street parking should become a standard part of the engineer's repertoire”.	Suggest implementation as Traffic Calming measure.
Page CI-19	Downtown Circulation and Parking - Recommend the reduction of the speed limit for the downtown area in the interest of safety of pedestrians (citizens) to 25 mph (model city: Bishop, CA on State Hwy 395). Per the Smart Growth Manual, “At 20 miles per hour, a pedestrian has a 95% chance of surviving collision, compared to only 10% at 40mph”.	Suggest implementation as Traffic Calming measure.
Page CI-21, 3 <sup>rd</sup> paragraph	Paragraph states City is fairly large.	Recommend clarification: Area or population.
Page CI-27, Truck Route Map	Some routes indicated do not exist today.	Recommend map indicate existing and proposed.

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Page CI-31, Implementation policy CI-1.10	Recommend dropping the following traffic signal: Larrea & 29 Palms Hwy – Exist	See Comments
Page CI-31, Implementation policy CI-1.10	Are we sure the Council will adopt DIF's? Therefore, are we sure construction of traffic signals will be performed via collection of DIFs.	See Comments
GP Update, Circulation, p. CI-4	2nd paragraph, line 4, Describe the streets as "unpaved" rather than dirt because it is sand, not dirt. This is true for all references to dirt streets (also CI-6, CI-21, for example).	See Comments
GP Update, Circulation, p. CI-5	MCAGCC section. May be useful to note the third entrance, on Morongo Road (Ocotillo Gate) to the Base is not located within the City boundary or SOI and thus not considered in the General Plan.	See Comments
Page CI-37	Says Pinto Mtns are north of the city, they are southeast of city. Also, next paragraph, states Twentynine Palms Hwy is designated Scenic Hwy and it should state "portions of".	See Comments
GP Update, Circulation, p. 47	No mention of use of airspace for helicopters at all. Although there is no designated helicopter route within the city limits, military helicopters often fly in and out over Joshua Tree National Park.	See Comments

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GP Update, Circulation, p. 47	Paragraph 2 should state: There is only one heliport located within City limits at Robert E Bush Naval Hospital.	See Comments
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GP Update, Circulation, p. CI-4	<b>Consistency/Grammar Comments:</b> Line 5 under setting/context, remove ", " after which as it is unnecessary.	See Comments
GP Update, Circulation, p. CI-19	<b>Consistency/Grammar Comments:</b> Third section, line 8, remove the word "on" after "analyze".	See Comments
GP Update, Circulation, p. CI-35	<b>Consistency/Grammar Comments:</b> Paragraph 2, line 1, Remove the word "recently" as this document will not be recent in a few years, nor with the transit center.	See Comments
GP Update, Circulation, p. CI-41/CI42/NS-22	<b>Consistency/Grammar Comments:</b> Reference on 41 states two paved lighted runways while on 42 list states no lighted airstrips. Inconsistency? Also 41 says Twentynine Palms Municipal Airport has fuel for purchase, but list on 42 says no fuel is available.	See Comments

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