

GPAC COMMENTS FOR DRAFT GENERAL PLAN AND DRAFT EIR

COMMENTS BY: GPAC – Recommendations Regarding Draft General Plan Circulation Element		DATE: 25 April 2011
CHAPTER/ PAGE/ PARAGRAPH	COMMENTS	PROPOSED ACTION FOR CONSIDERATION
General Comment	Development of 38,917,800 s.f. of Commercial Area 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 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.
General Comment	Not Referenced in Circulation Element Potential impacts of development on tribal land are not addressed in the Circulation Element. 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 and other commercial development at some future point. Such development could have significant land use impacts. Impacts created by this possible future development have not been analyzed or planned for in the General Plan nor are they discussed in the draft EIR.	The GPAC recommends that such impacts be considered and that appropriate goals, policies and implementation measures be included in the Circulation Element of the new General Plan.
General Comment	Joshua Tree National Park The Joshua Tree National Park requests that references be either United States National Park Service or National Park Service.	Please make references to the National Park per their recommendation.
General Comment	Seek Designation as Scenic Highway/Byway 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.	Create a goal that reflects Scenic Highway/Byway.
General Comment	Utah Trail JTNP Entrance Maintaining the open view shed of the park is important to the overall quality of life in Twentynine Palms.	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.
Draft EIR page 4.16-1	Inadequate Traffic Study 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, 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. 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.	Consider impacts of a different study on needs for various traffic related “products”.

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CI-4, CI-6 and CI-21	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).	Roads are sand not dirt.
CI-4	Consistency/Grammar Comments: Line 5 under setting/context, remove "," after which as it is unnecessary.	Remove extra punctuation.
CI-5	New Visitor Center , Page 5 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.
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.	Note that the Ocotillo gate is not in the city or the sphere of Influence.
CI-6	Joshua Tree National Park 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.	Correct for accuracy.
CI-6	Development of MBTA to Promote Tourism 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.	Include new goal in CI-6 that encourages accommodations for tourist activities.
CI-18	Twentynine Palms Highway 1 st 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.	Recommend changing “only” to “primary access route” and delete the remainder of sentence.
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.
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.
CI-19	Consistency/Grammar Comments: Third section, line 8, remove the word "on" after "analyze".	Correct for grammar issues.

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CI-20	Grammar/Consistency 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 for accuracy.
CI-21, 3rd paragraph	Paragraph states City is fairly large.	Recommend clarification: Area or population.
CI-27, Truck Route Map	Some routes indicated do not exist today.	Recommend map indicate existing and proposed.
CI-30	Grammar/Consistency Typo on page 30 in Implementation Policy CI-1.3: strike the word “will”.	Correct typographical error.
CI-31, Implementation policy CI-1.10	Recommend dropping the following traffic signal: Larrea & 29 Palms Hwy – Exists	Traffic signal exists at Larrea and 29 Palms Highway and should be removed as a potential signal or needing study.
CI-31,	Implementation policy CI-1.10, Are we sure the Council will adopt Development Impact Fees (DIF)? Therefore, are we sure construction of traffic signals will be performed via collection of DIFs.	Is there an alternative to funding the signals rather than Development Impact Fees?
CI-32	Implementation Policy CI-1.14 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.
CI-32	Grammar/Consistency Replace the word “assistance” with “disturbance” in Implementation Policy 1.18, p. CI-32.	Correct typographical error.
CI-32	Grammar/Consistency Replace the word “enhancing” with “preserving” in Implementation Policy 1.19.	Correct typographical error.
CI-33	Rural Standards 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.

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CI-34	Low Impact Design (LID) Standard for Flood Control Implementation Policy CI-5.3 for flood control channels should include the State (and federal) Low Impact Design standards.	Include state and federal low impact design standards.
CI-35	Grammar/Consistency Text in Implementation Policy CI-6.1 (p. CI-35) regarding MBTA “Agency” should be changed to “Authority” for consistency.	Correct typographical error.
CI-35	Remove the “recently” from paragraph 4 and delete reference to public restroom.	Correct typographical error.
CI-35	Consistency/Grammar Comments: Paragraph 2, line 1, Remove the word "recently" as this document will not be recent in a few years, nor with the transit center.	Correct typographical error.
CI-37	Grammar/Consistency Page 37, the Pinto Mountains are not north of the city. Mountains north of the city should be identified as the Bullion Mountains.	Correct typographical error.
CI-37	Twentynine Palms Hwy is designated Scenic Hwy and it should state “portions of”.	Correct typographical error.
CI-41 and CI-42	Consistency/Grammar Comments: Reference on 41 states two paved lighted runways while on 42 list states no lighted airstrips. Inconsistency?	Correct the inconsistency in the document.
CI-41 and CI-42	Consistency/Grammar Comments: Twentynine Palms Municipal Airport has fuel for purchase, but list on 42 says no fuel is available.	Correct the inconsistency in the document.
CI-47	Paragraph 2 should state: There are three heliports located within City limits they are actually aboard MCAGCC.	Correct the inconsistency in the document.

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CI-51	<p>Signalized Intersections 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. 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> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%;">Signalized Intersections per Implementation Policy CI-1.10 of the General Plan Circulation Element</th> <th style="width: 50%;">Signalized Intersections per 2007 Urban Crossroad Traffic Study</th> </tr> </thead> <tbody> <tr> <td></td> <td>Amboy Road /Twentynine Palms Hwy</td> </tr> <tr> <td></td> <td>Lear Av/Amboy Rd</td> </tr> <tr> <td>Lear Avenue and Two Mile Road</td> <td></td> </tr> <tr> <td>Lear Ave and Twentynine Palms Highway</td> <td>Lear Ave and Twentynine Palms Highway</td> </tr> <tr> <td>Morongong Road and Amboy Road</td> <td>Morongong Road and Amboy Road</td> </tr> <tr> <td>Larrea Ave and Twentynine Palms Hwy</td> <td>Larrea Ave and Twentynine Palms Hwy</td> </tr> <tr> <td>Larrea Avenue and Two Mile Road</td> <td>Larrea Avenue and Two Mile Road</td> </tr> <tr> <td>Mesquite Springs Road and Amboy Road</td> <td>Mesquite Springs Road and Amboy Road</td> </tr> <tr> <td>Mesquite Springs Road and Two Mile Road</td> <td>Mesquite Springs Road and Two Mile Road</td> </tr> <tr> <td>Mesquite Springs Rd/Twentynine Palms Hwy</td> <td></td> </tr> <tr> <td>Split Rock Ave/ Twentynine Palms Hwy</td> <td>Split Rock Ave/ Twentynine Palms Hwy</td> </tr> <tr> <td>National Park Dr./Twentynine Palms Hwy</td> <td>National Park Dr./Twentynine Palms Hwy</td> </tr> <tr> <td>Utah Trail and Twentynine Palms Highway</td> <td>Utah Trail and Twentynine Palms Highway</td> </tr> </tbody> </table> <p>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</p>	Signalized Intersections per Implementation Policy CI-1.10 of the General Plan Circulation Element	Signalized Intersections per 2007 Urban Crossroad Traffic Study		Amboy Road /Twentynine Palms Hwy		Lear Av/Amboy Rd	Lear Avenue and Two Mile Road		Lear Ave and Twentynine Palms Highway	Lear Ave and Twentynine Palms Highway	Morongong Road and Amboy Road	Morongong Road and Amboy Road	Larrea Ave and Twentynine Palms Hwy	Larrea Ave and Twentynine Palms Hwy	Larrea Avenue and Two Mile Road	Larrea Avenue and Two Mile Road	Mesquite Springs Road and Amboy Road	Mesquite Springs Road and Amboy Road	Mesquite Springs Road and Two Mile Road	Mesquite Springs Road and Two Mile Road	Mesquite Springs Rd/Twentynine Palms Hwy		Split Rock Ave/ Twentynine Palms Hwy	Split Rock Ave/ Twentynine Palms Hwy	National Park Dr./Twentynine Palms Hwy	National Park Dr./Twentynine Palms Hwy	Utah Trail and Twentynine Palms Highway	Utah Trail and Twentynine Palms Highway	Include trigger points so the general public understands when signals are needed and required.
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CI-69	Increase in Sphere of Influence Land Use Refinements 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.”	Please clarify for the GPAC. 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.
CI-70	Development of Mesquite Dunes and JTNP Buffer 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.	Please clarify for the GPAC. What Traffic Analysis Zones (TAZ) were affected by this incorrect assumption?
CI-70	Lower Commercial Intensities Also on page 70 of the Supplemental Traffic Study it states, “Lower intensities of 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?

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CI-71	<p>Additional General Plan Roads</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. It appears that, with 40% of the previously anticipated traffic, only minor reductions have been made to General Plan roadway network, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The two-mile long 8-Lane Expressway designation has been changed; it is now proposed to be six lanes. <input type="checkbox"/> The bypass has been rerouted to avoid excessive construction costs anticipated as a result of topography. <input type="checkbox"/> Morongo Road between Amboy Road and Indian Trail has been deleted. <input type="checkbox"/> 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>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 upgraded 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> <ul style="list-style-type: none"> <input type="checkbox"/> Montonya south of SR 62, leading into a sparsely populated rural area and ending two miles south of SR 62 at the JTNP border. <input type="checkbox"/> The addition of Whitmore Road between Montonya and Lear in the RL 2.5 land use district. <input type="checkbox"/> Dorth Place south of SR 62, with an ADT of 500. Why is it recommended as a collector? <input type="checkbox"/> 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? <input type="checkbox"/> 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? <input type="checkbox"/> 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>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>

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CI-75	<p>Special Study Area for Adobe Road 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 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 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>	Please answer variety of questions presented in the comment section.