

**GPAC COMMENTS FOR DRAFT GENERAL PLAN AND DRAFT EIR**

<b>COMMENTS BY:</b> <b>GPAC – Recommendations Regarding Draft General Plan Conservation and Open Space Element</b>		<b>DATE:</b> <b>25 April 2011</b>
<b>CHAPTER/ PAGE/ PARAGRAPH</b>	<b>COMMENTS</b>	<b>PROPOSED ACTION FOR CONSIDERATION</b>
General Comment	This Element does not speak to the conservation of natural resources. The State General Plan Law (CO-9) “requires cities to prepare an Open Space element which addresses...open spaces for the preservation of natural resources including, but not limited to, areas required for the preservation of plant and animal life.” This does not mean just listed and Special Status Species (SSS). One of the outstanding natural resources in 29 Palms and its sphere of influence is the intact functioning ecosystems, including wildlife corridors, which support the diversity of plant and animal life we treasure and which is protected under CEQA and other applicable laws.	Suggest rewrite goal CO-1 as Goal: The city protects its natural resources and functioning ecosystems without compromising compatible economic activity.
General Comment	Potential policy to follow goal CO-1.	Policy: The city shall provide for the protection of plants, animals, and their habitats, while allowing compatible economic activity.
General Comment	<b>JTNP Buffer</b> – This is an Overlay and warrants a goal and policies.	Create Goal and Policies.
General Comment	<b>Ephemeral and Intermittent Streams</b> -these are a significant natural resource and need to be called out in a Goal with IM.	Create Goal and Policies.
General Comment	There is no mention of <b>solar or wind power generation</b> . <input type="checkbox"/> Solar System Service Agreements can enable solar panel installation on City buildings at little or no cost to the City. Third party companies install solar panels on City facilities and take advantage of the rebates and tax incentives. The City can demonstrate renewable energy leadership by having solar panels installed on City buildings. <input type="checkbox"/> Explore financial incentives for homeowners and businesses to employ solar energy. <input type="checkbox"/> Support the compatible, retro-fit of solar equipment on existing homes in cooperation with neighborhood aesthetic requirements. <input type="checkbox"/> Use innovative energy projects such as Solar System Service Agreements, to support the expanded use of alternative energy sources. Consider partnering with utilities and industry to accelerate or expand innovative, renewable energy projects.	Create Goal and Policies related to alternative forms of power generation and the incentives and rebates related to that.
General Comment	“Appropriate” is an unnecessary word – what other kind is there.	Eliminate the word appropriate wherever it appears in the GP
General Comment	Add new IP following IP CO-3.4 Education of the public	Work with the 29 Palms Water District to develop programs that educate the public about the importance of water conservation and water-efficient landscaping.

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CO-1	4th paragraph: The Purpose... 1 <sup>st</sup> Bullet: Provide the background... The city’s plans to preserve its natural resources are not clearly stated in this goal. See discussions below.	This has not been accomplished in the General Plan Update
CO-1	2 <sup>nd</sup> Bullet: Important natural resources, such as soils, wildlife corridors, vast areas of undeveloped open space, intact ecosystems supporting high biodiversity of plants and animals, ephemeral and intermittent streams are not identified or protected by goals or IPs.	Revise list of natural resources to include: soils, wildlife corridors, vast areas of undeveloped open space, intact ecosystems supporting high biodiversity of plants and animals, ephemeral and intermittent streams.
CO-1	3 <sup>rd</sup> Bullet: The foundation has not been set for the preservation of these resources.	Develop goals, policies, and implementation measures to protect these important and essential resources
CO-1	4 <sup>th</sup> Bullet: Sustainability (p.XIV),by definition means economic needs are compatible with, and do not trump, the conservation of ecosystem function. In the executive summary page xiv it discusses sustainability. Yet there is no understanding of the natural environment in the GPU.	Environmental integrity can only be promoted by preserving conserving ecosystem functions. Develop goals, policies, and implementation measures to promote and preserve these functions.
CO-1	5 <sup>th</sup> Bullet: The City is not the entity which establishes natural resources priorities. The State and Federal Government do that under various applicable laws.	Suggest revision to say "Establish the city's requirement to the ..."
CO-2	7 <sup>th</sup> Bullet: No criteria have been identified for the future selection of open space	Establish criteria in the GPU
CO-2	Final paragraph <i>...element is intended to identify various kinds of resources which have value for the City. It is not the city’s job to identify what natural resources have value. It is the City’s job to adopt a GPU that protects its natural resources and the functioning ecosystems that supports them.</i> <i>Such resources define the community</i> Implies that the city identifies what natural resources have value to define the city. <i>help to preserve the natural integrity of the community.</i> Natural resources do not preserve the natural integrity of the community. The community’s integrity rests with its citizens. Perhaps community is intended to be “environment” <i>the identification of natural resources will help determine the on-going sustainability and viability of a Twentynine Palms.</i> Only the preservation of the natural resources will determine the on-going sustainability and viability of 29 Palms.	Needs a complete revision

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CO-3	4th Paragraph, 2nd sentence: <i>The primary goal of this Element is the identification and preservation of resources deemed sensitive or important to the City.</i> It is the City’s job to preserve resources not identify them.	Rewrite
CO-4	Reference the proximity of the Mojave and Sonoran desert, it states” the Sonoran Desert is separated from the Mojave by the Eagle Mountains. This is incorrect.	Remove sentence
CO-7	<i>With its rich and varied landscape, the Morongo Basin accommodates several ecological habitats that are home to numerous flora and fauna. Preserving habitat not only aids in sustaining species’ survival, but also maintains the quality of life in the Valley and promotes tourism.</i> Put some names to the landscape, which ecological habitats, name some of the numerous flora and fauna. Last sentence is weak and meaningless.	This paragraph provides NO information. Rewrite so that decision-makers have a real feeling for the diversity of what they are tasked with preserving. Do not use vague words like “several” or “numerous”. Suggested language: <i>The Morongo Basin is located in a rich and varied landscape that is home to numerous flora and fauna. Preserving habitat not only aids in sustaining species’ survival, but also maintains the quality of life in the Valley and promotes tourism.</i>
CO-8	Special Status Species, Line 2 pertinent implies a choice.	Replace "pertinent" with “all applicable regulations”
CO- 8	1st Paragraph under Special Status Species 2 <sup>nd</sup> Sentence. <i>These agencies and private conservation organizations...</i> This sentence implies that the agencies and private conservation organizations (left unnamed) develop lists of Special Status Species (SSP) that <i>may</i> be of concern because their decline is either documented or perceived.	Rewrite to reflect actual process.
CO-8	Final sentence. What is meant by “generally imposes” – As written, this sentence provides no useful information.	Rewrite giving specifics of what must be done when a Threatened or Endangered species is found and include mitigation.
CO-9	3rd paragraph, line 6, capitalize the "O" in open Space.	Please fix typo.
CO-10	<b>Biological Resources:</b> This description of the Habitat and Vegetation. Plants, Wildlife, and Wildlife Corridors are not adequately described and referenced.	This section should be reviewed, rewritten and edited by a person with a professional background in the biological sciences.

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		As written is it grossly inaccurate and incomplete.
CO-10	<b>Para.1, line 7</b> "Most of the watercourses outlet..."	Change pass through or drain through the city, they don't really outlet to it. This causes flooding and the rewrite should reflect the actual hydrology of the area.
CO-15	1st paragraph 1, line 3 (stylistic suggestion): delete apostrophe after species. It works that way too and is visually less confusing.	Please fix grammatical issue.
CO-27	Talks about the Morongo Basin wildlife corridors occurring in an ecological transition zone between the Mojave and Sonoran deserts. The Morongo Basin is entirely in the Mojave Desert. The transition zone is 15 miles south by the Cholla Cactus Garden.	Correct
CO-28	<i>Goal:CO-1 Designate, maintain and enhance the quality of permanently protected open space used by both endangered and special status species.</i> "Permanently protected open space" refers to that land which the city acquires as mitigation through CEQA & NEPA projects involving "take". For any such projects the city is the Lead Agency, but it is <u>not</u> the Responsible Agency that approves the designation and permanent conservation of mitigation lands. The CA Dept of Fish & Game is the RA. The wording of this goal misstates the intent and more importantly it assumes for the city a function it does not legally have. That being the case it should be eliminated as the over-all goal for the IPs that follow.	Suggested rewrite to more accurately express the intent of the policy. (see next comment for suggested language)
CO-28	The West Mojave Plan has not to date been passed and it seems for the foreseeable future it will not be passed. The GPAC would like a plan B option to be expressed in the General Plan Update.	Plan B Option: The GPAC suggests the City develop a Natural Community Conservation Plan (NCCP) to protect its natural resources and ecosystems. (Natural Community Conservation Planning Act -1991).
CO-28	Confusing and overly detailed. Implementation Policy 1.1 is confusing to the lay person due to its length and detail.	Rewrite to reflect revised goal CO-1.
CO-28	CO 1.2 This appears to be cherry picked from the 4.4.5 Mitigation Measure BR-6. (4.4-37). Since this is a requirement for all development projects it does not need to be stated as an IP. Also it makes the reader wonder why the Desert Tortoise, the iconic threatened species was not chosen to be singled out.	Eliminate or rewrite as "Perform surveys as required by CEQA or NEPA in all development projects on vacant properties for all Federal and

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		State Threatened and Endangered species."
CO-28	CO 1.3 Currently the MDBO is not being managed to preserve its biological resources. The dune and bosque system is impacted by illegal OHV trespass, wood cutting, and dumping within its boundary.	GPAC recommended Policy revision language: The City shall protect the biological and hydrological values of the Mesquite Dunes Overlay through development code restrictions and proactive law and code enforcement.
CO-28	IP CO 1.4 Participate in the preparation, development, approval and implementation of the West Mojave Plan.	Suggest eliminating this policy.
CO-29	CO-1.5 Coordinate with federal and state agencies and private conservation organizations to preserve environmentally sensitive open space and conservation.	Consider rewriting or at a minimum finish the sentence with the word "areas". Suggested rewrite: The city shall encourage the preservation of environmentally sensitive open space and conservation areas through partnerships with federal and state agencies, land trusts, and conservation organizations.
CO-29 and EIR 4.4-30	CO-1.6 <i>Provide for appropriate access into sensitive habitat areas to allow residents and tourists use for educational and passive recreational uses.</i> Refer to EIR "The majority of the sensitive habitat within the Planning Area is located within lower-density residential designations (Rural Living-5 and Rural Living-2.5) of the Land Use Plan." Use of the word <i>appropriate</i> is not justified unless one assumes that inappropriate access, standards, laws, etc. could be developed and adopted. How is it appropriate for the city to provide access to private land for any purpose. What is "appropriate access" onto private land? "educational and passive recreational uses" – confusing. Is the city planning for parks here? Will there be nature walks, hiking trails, bicycle trails on this land?	This is confusing and lacks implementation direction. Be more specific as to ownership, access and use, or delete completely. Delete "appropriate".
CO-29	CO 1.7 Adopt appropriate standards to ensure that development adjacent to any adopted conservation areas respects the provisions of the conservation and that provides an appropriate transition between conservation areas and developed areas.	Consider rewriting or add the missing word on the 4th line after conservation... "area" and take out

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		“appropriate”. Suggested Rewrite: Develop and adopt an ordinance to ensure that development adjacent to a conservation area protects the biological and hydrological resources of the area through planning and a buffer zone.
CO-29	CO1.8 This policy does not offer guidance or suggest actions to protect native plants without which it is not “sustainable” and should be rewritten.  Refer to EIR 4.4 Native Plants Protection Act and California Native Desert Plants Act.	Rewrite in favor of strong native plant and grading ordinances protecting native plants and habitat by strongly encouraging private owners who are developing their land. The GPAC feels it is not appropriate to require private citizens but instead, encourage, educate, and/or incentives, protective and salvage measures for native plants.
CO-29	CO-1.9 How does this differ from 1.8?	Eliminate in favor of a stronger 1.8.
CO-29	CO-1.10 Developers and the City, as lead agency, must comply with permitting and mitigation regulations of NEPA and CEQA. Therefore this IP does not offer clear direction. It is also applicable outside the Desert Fan Palm Oasis.	GPAC suggests rewriting the Policy: The city will meet or exceed the requirements of applicable environmental laws, regulations and local rules.
CO-30 and EIR 4.4-33	Protection of the wetlands also falls under the “no net loss” policy CO-1.11 It is stated in the EIR that mitigation for “loss” “will insure that any impacted resources of this type are replaced within the local creek area, so there is no net loss of such resources.” This mitigation strategy is neither feasible nor possible. Wetland areas are controlled by their hydrology – if one area is destroyed all surrounding areas are impacted. There is no way to avoid “net loss” in this small wetland, which is controlled by the Mesquite Springs Fault and is totally contained within the northern eastern portion of the 29 Palms watershed. There are no comparable areas outside this wetland, it is unique.	GPAC recommends that the boundary be amended to encompass the entire Mesquite Dune and Bosque hydrologic area and the General Plan provide policies to protect it.
CO-30	CO-1.11 In regard to “no net loss,” ephemeral and intermittent waterways have been left out and should be included because: “Ephemeral and intermittent streams provide the same ecological and hydrological functions as perennial	Read this carefully because it applies to goals throughout the GP. The

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	streams by moving water, nutrients, and sediment throughout the watershed. When functioning properly, these streams provide landscape hydrologic connections; stream energy dissipation during high-water flows to reduce erosion and improve water quality; surface and subsurface water storage and exchange; ground-water recharge and discharge; sediment transport, storage and deposition to aid in floodplain maintenance and development; nutrient storage and cycling; wildlife habitat and migration corridors; support for vegetation communities to help stabilize stream banks and provide wildlife services; and water supply and water-quality filtering. They provide an array of ecological functions including forage, cover, nesting, and movement corridors for wildlife. Because of the relatively higher moisture content ...vegetation and wildlife abundance and diversity in and near them is proportionally higher than in the surrounding uplands. ...land management decisions must employ a watershed-scale approach that addresses overall watershed function and water quality. Ephemeral and intermittent stream systems comprise a large portion of southwestern watersheds, and contribute to the hydrological, biogeochemical, and ecological health of a watershed. Given their importance and vast extent, it is concluded that an individual ephemeral or intermittent stream segment should not be examined in isolation. Consideration of the cumulative impacts from anthropogenic uses on these streams is critical in watershed-based assessments and land management decisions to maintain overall watershed health and water quality.” REFERENCE: Abstract: The Ecological and Hydrological Significance of Ephemeral and Intermittent Streams in the Arid and Semi-arid American Southwest. EPA/600/R-08/134ARS/233046 November 2008 www.epa.gov	GPAC also feels that a watershed map should be included in the General Plan Update.
CO-30	CO1.11 Define “no net loss” – You must be very clear, “no net loss” according to what definition.	Needs lots of revision including a strong policy and implementation measures. Either here or separately, ephemeral and intermittent waterways must be included to reflect the watershed processes.
CO-30	CO 1.11 Refer back to CO-1.3 Exhibit 4.42 Wetlands Map is based on the Wetlands Mapper and is not specific enough to provide the detail necessary to implement a “no net loss” policy, however the policy is defined. It also does not include the ephemeral and intermittent waterways which are important for ecosystem functioning (see section below) and determine the continued viability of the surface and at depth hydrology of the Mesquite Dunes and Bosque overlay.	Correlate with IP:SF 2.6 p. LV (change “active streams” to ephemeral streams and waterways in the alluvial fan and basin...)
CO-30	Without the protective measures mentioned above, the Impact for Biological Resources EIR 4.4 C is incorrect. <i>No substantial adverse effect on federally protected wetlands due to GPU policies.</i>	A management policy for protection is required to prevent known adverse effects. Create or amend a policy that law enforcement will proactively patrol and cite for illegal activity and trespass.
CO-31	Discusses the history of 29 Palms, mentioned in the third paragraph the establishment of the Morongo Band of Mission	Correct or use language suggested in

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	Indians Morongo reservation. Since this plan deals with 29 Palms, talk about the two reservations in the city belonging to the 29 Palms Band of Mission Indians.	land use comments
CO-31	Mentions in two places the Chemehuevi tribe. In paragraph two, it says they arrived around 1870. Then in paragraph five it says they were here in 1855 when Colonel Washington did his survey.	The dates need to be corrected specifically the 1855 reference should be to the Serrano not the Chemehuevi.
CO-33	CO-42 Extensive discussion on Keys Ranch. Not in city.	Consult with historical society for local cultural and historic resources in the city.
CO-33	CO-42 (remove) Table CO-2, no reference to Roughley Manor.	Consult with historical society for local cultural and historic resources in the city.
CO-35	CO-2.6 (remove) Strike “when possible” – it is either a policy of the city to protect its resources or it is not.	Rewrite.
CO-35	<b>Goal CO-2</b> Please write in Goal language.	Suggested : Goal: The City’s cultural resources are identified and protected.
CO-35	CO – 2.5 Limited, do we not want to consider other ways to encourage preservation than by an archaeologist? Maybe historian, historical society, biologist?	Suggest “preserving cultural resources in place”
CO-36	CO-2.7 If the project is in compliance with AIC than “deemed appropriate” is unnecessary	Rewrite
<b>CO-37 or 38????</b>	<b>Why are we making this suggestion????????????????</b>	<b>Suggest updating and using entire Section III of current Conservation element before Ground water pollutants..</b>
CO-37	Recharge discussion should reflect the findings of the Twentynine Palms Water Districts 2010 Groundwater Study for the Mesquite Lake Sub basin – Kennedy/Jenks consultants	The City of 29's aquifers do not recharge. Please consult with the Water District for more information and have this be reflected throughout the GPU.
CO-39 & 40	<b>HISTORIC LAND USE</b> Partly due to its geographic setting, Twentynine Palms was a center of activity for a succession of settlers over the last 200 years. The Oasis of Mara provided water and shelter for early Native American inhabitants; mineral deposits in the nearby mountains attracted miners and prospectors; upland valleys provided grazing land for cattlemen; the clean, dry air	Suggest using current GP statement for History it is more clear & concise.

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	was sought by wounded war Veteran’s after World War I; the uninhabited desert valleys and mountain ranges to the north proved to be ideal for military training grounds; and the opening of vast tracts for settlement through the Small Tract Act attracted hundreds of homesteaders after World War II. Over the years, people have been drawn to the area for a variety of reasons. Today, the community is a rich mixture of visitors and residents who come to the High Desert seeking clean air, wide open spaces, and a high quality of life.	
CO-39	Projected Water Supply	Suggest revising based on information from the Water District concerning supply which is said to be hundreds of years not 30 or 40. Refer to 2010 Groundwater Study for sufficient water capacity data.
CO-41	<b>Landscaping and Irrigation</b> The City currently does not have an adopted landscape ordinance ??? and is using the “Let’s Go Native...with our Landscaping” guidelines developed by Twentynine Palms Groundwater Guardian Team. ??? The guidelines recommend the planting of climate appropriate drought tolerant landscaping to minimize water usage for landscaping throughout the City.	Suggest including the Hi-Desert Landscape Work Shop guidelines.
CO-41	Population estimates for the District 15,700 in 2004 – 25,510 in 2030 Give more accurate number	Update number per 2010 census.
CO-41	CO 4.1, 4.2, and 4.3 Consolidate IPs dealing with agency regulations of pollutants.	Suggested language to replace the 3 policies: The city shall cooperate with the Mojave Desert Air Quality Management District to assure compliance with federal and state air quality standards
CO-42	Implementation Policy: CO-3.1 and 3.12 Concerning water usage in landscape design. The GPAC feels that requiring amounts of water rather than encouraging usage is prescriptive.	Suggest revising the use of the word "require" to "encourage".
CO-42	CO-3 Goal implies the city has control when in reality it is the water district.	Rewrite Goal; The City’s water supply exceeds health standards.
CO-42	CO-3.5 seems as if it is not appropriate for the City of 29	Please clarify this Policy in relationship to NPDES and the City.
CO-42	CO-3.6 seems as if it is not appropriate for the City of 29. This could probably be applied to a specific project/development but citywide from our understanding would imply a sewer system, which we do not currently have.	Please clarify this Policy in relationship to NPDES and the City.

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CO-42	CO-3.13 seems as if it is not appropriate for the City of 29	Please clarify this Policy in relationship to alternative water sources and the City.
CO-42	CO-3.14 seems as if it is not appropriate for the City of 29	Check for updates on 2005 Urban Water Management Plan.
CO-42	CO – 3.1 Prepare and adopt laws and regulations to require climate appropriate and drought resistant landscape for all public and private landscaping within the City.	Couple of suggestions: Suggest revising. Eliminate “prepare and adopt laws and regulations to require” to “Encourage” (ie. Luckie & Knott’s, enforcement capabilities).  See CO - 3.4 suggest possible eliminating CO -3.1 or add “Foster good relationship...”  Suggest combining CO – 3.1, CO – 3.4, and CO – 3.12 into one readable IP. Too much redundancy.
CO-42	CO – 3.1 Is that not taking away property owners rights? REQUIRE climate appropriate and drought resistant landscape?	Add native and drought resistant plants.
CO-42 & 43	IP CO – 3.5, CO – 3.7, and CO-3.8	Suggest consolidating IPs dealing with groundwater quality
CO- 43	IP CO – 3.6 and CO – 3.10	Consolidate these IPs dealing with groundwater recharge
CO-44	IP CO – 3.13 and CO – 3.14	Water supply and consumption – IPs should refer to 2010 Groundwater Study for the Mesquite Lake Subbasin – Kennedy/Jenks consultants
CO-45	Discussion of air quality in front matter is significantly lacking in clarity and details. Discussion of Air Quality should include vehicular traffic and recreational OHV disturbance as sources for PM 10.	Rewrite for clarity and accuracy of Air Quality and sources of pollution

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	In general, if an area in our desert is left undisturbed and it is natively vegetated with the naturally developed thin crust, the land remains intact during wind storms and is not a source of PM10 or fugitive dust.	in the city and sphere of influence. Also include discussion of vehicular traffic on dirt roads, including recreational OHV use, as well as other man-made activities which disturb the natural soil crust.
CO-50 and CO-51	The abbreviation “CARB” is first used on page 50 before it’s defined on page 51.	Switch “(CARB)” from page 51 to page 50.
CO-52	Implementation Policy: CO-3.9 Coordinate with Twentynine Palms Water District in efforts to expand sewer services to protect groundwater quality.  Cooperate with all appropriate agencies in efforts to construct waste water and sewer services to protect groundwater quality.	There are no current sewer services. We can construct services, we can examine feasibility, but we cannot expand something that does not exist. Please revise.?? See land use comments on sewers.
CO-52 REMOVE???	Implementation Policy: CO-3.11 Adopt regulations to require new development to incorporate features into site drainage plans to reduce impermeable surface area, increase surface water infiltration and minimize surface water runoff during storm events.	Isn’t this addressed in the adopted Building Codes or Development Code If so eliminate CO.
CO-52	Air quality values within the Joshua Tree National Park are discussed in the Park’s General Management Plan (GMP). Air quality related values such as visibility of panoramas inside the Park and clear, long distance vistas outside the Park are considered to be primary attractions and essential to a visitor’s enjoyment of the Park. According to the GMP, some views have already diminished because of a gradual deterioration of air quality in recent decades primarily contributed by polluting sources in the Los Angeles Basin.	Suggest adding statement in comment section to opening statement in “AIR QUALITY AND CLIMATE CHANGE”
CO-60	Change CN-4.14 to 4.18 to CO-4.14 to 4.18	Correction
CO-63 and EIR ES 4.6.B	<b>Soils.</b> Discussed in GP-CO-73 as a mineral resource and in EIR ES 4.6.B. <i>Impacts associated with wind-driven soil erosion and loss of top soil will be less than significant because the <u>GP Update Program policies and future development will decrease undeveloped and non-vegetated land exposed to windy conditions.</u></i> This is completely inaccurate. What non-vegetated land will be developed? Undisturbed undeveloped land is generally not a source of dust. Disturbed land is	There needs to be a policy with and implementation measures to protect soils as the foundation of desert ecosystems and to protect public

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	<p>a source of dust.            Numerous references to the importance of desert soils will be found in the references cited at the end of this cell.            The EIR does not consider the following:</p> <ul style="list-style-type: none"> <li>• that healthy desert soils are the vital long-term life support for ecosystems.</li> <li>• that soils are necessary to maintain plant life.</li> <li>• that surface pebble accumulation, hardened mud and biological soil crusts protect desert soils from erosion.</li> <li>• the combined effect of human land clearing activities (grading and OHV activity) on the natural processes which put soil in motion.</li> <li>• that soil disturbance is cumulative and essentially permanent since recovery rate is extremely slow.</li> <li>• that desert soils are the product of past wetter times and took from 5-10,000 years to develop.</li> <li>• that loss of plant cover from human activities, such as OHV activities, contributes to loose soil, promotes erosion and flooding, and prevents ground water recharge.</li> </ul> <p>The GPU            Erroneously minimizes fugitive dust as a product of “blow sand, sand deposits naturally eroded by wind and deposited elsewhere on the ground or dispersed in the air.” ...Man-made activities, such as site disturbance and grading activities can worsen PM10 by lifting particles into the air, allowing them to be suspended.” (Pollutants CO-54)            A source of the fugitive dust in 29 Palms and its sphere of influence are the dirt roads and illegal trails created by OHV activity. The Mojave desert is in non attainment for PM10. <a href="http://www.meca.org/galleries/default-file/Part1.pdf">http://www.meca.org/galleries/default-file/Part1.pdf</a> This is, and has been, a hot topic at 29 Palms City Council and GPAC meetings, newspaper, so why this controllable activity was not discussed under Pollutants can only be guessed at. Further, anyone who takes the effort to stand outside in a wind storm will note that moving sand comes from disturbed areas, not those with intact vegetative cover.            The extensive effects of even minimal passage of motorized vehicles across desert soils will be found in: Wilshire, Nielson, Hazlett. 2008 <i>The American West at Risk</i>. Oxford University Press. pp. 289-300.            Brooks and Lair, Biological Effects of Vehicular Routes in a Desert Ecosystem in <i>The Mojave Desert: Ecosystem Processes and Sustainability</i>. 2009. University of Nevada Press. pp. 168-195            Pavlick. <i>The California Deserts: An Ecological Rediscovery</i>. 2008. University of California Press. Desert soils, pp. 88-92 for a start. OHVs and roads pp.257-267</p>	health from dust.
CO-63	<b>Soil Resources:</b> Expand to include the importance of biological soil crusts,	Refer to comments above
EIR  REMOVE????	<p><b>Wildlife Corridors</b>            Biological Resource mitigation measure 7 (BR-7) to make less that significant development which might <i>eliminate or seriously fragment wildlife corridors and migratory routes.</i>            BR-7: <i>Prior to approval of any land use plan or development project proposal within the Wildlife Corridors Overlay area that affects more than two (2) contiguous acres of undeveloped land, a <u>biological assessment</u> of the effects on</i></p>	Develop a policy with implementation measures to protect the integrity of the wildlife corridors and migratory routes within the city and its sphere of influence over the life of the GP.

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	<p><i>wildlife movement shall be completed and considered by the <u>City’s decision-makers</u>. This assessment shall be submitted to the <u>Development Services Director</u> for review/approval, and <u>shall be included in the CEQA analysis and documents for all such proposals</u>.</i></p> <p>Comments</p> <ul style="list-style-type: none"> <li>• A biological assessment is a NEPA activity. What about CEQA?</li> <li>• It is probable that the city’s decision-makers will not have enough expertise in this matter to evaluate it without expert guidance.</li> <li>• 29 Palms does not have a Development Services Director. They do have a Community Development director.</li> <li>• It is probable that the city’s Community Development Director will not have enough expertise in this matter to evaluate it without expert guidance.</li> <li>• Without expert guidance to interpret the “biological assessment” this mitigation measure guarantees wildlife corridors and migratory routes will become fragmented. The level of impact could be severe, especially cumulatively, over time as decision-makers and community development directors change. A policy with implementation measures to provide continuity over the next 20 years is an important BMP to conserve the integrity of wildlife corridors.</li> </ul>	
CO-64	<p>The Goal concerning <b>night time views</b> reads as though the goal was to see in the city at night, not to preserve our dark star filled skies a major tourist attraction and quality of life amenity.</p> <p>Goal: CO-6 Preserve quality nighttime views within the City. (pp. 74 and 89) Nighttime views do not describe or address the important issue of preserving dark skies as a natural resource.</p> <p>IP: CO-6.1 Adopt night sky preservation regulations that limit the amount and type of lighting within rural style development. This IP does not adequately address the issue of dark skies. What about lighting in the central part of the city, shouldn’t the lights be shielded there as well?</p> <p>IP: CO-6.4 Enforce City lighting standards as detailed in the City’s Development Code. That strategy has been unsuccessful up until now. A stronger education and incentive program is required.</p> <p>What is missing:</p> <ol style="list-style-type: none"> <li>1. The National Park Service is committed to the preservation of dark skies as a natural resource. The city is immediately adjacent to JTNP and should partner with them in this initiative for more effective outreach and possibly as a funding avenue for lighting improvements in the city.</li> <li>2. The Sky’s the Limit is an important citizen initiative to build an observatory and nature center adjacent to the</li> </ol>	<p>How this Goal could be rewritten:</p> <p><b>Title:</b> Dark Skies</p> <p><b>Goal:</b> CO-6 Twentynine Palms protects its dark skies to preserve this vanishing natural resource, improve the community’s quality-of-life, support the tourist economy, and aid in the reduction of greenhouse gasses.</p> <p><b>Objective:</b> Excessively bright and fugitive light obscures the dark sky, adds to greenhouse emissions, affects human health, and interferes with the nighttime activities of wildlife will be reduced.</p> <p><b>Policy:</b> The city shall adopt and enforce outdoor lighting standards</p>

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	<p>Park entrance on Utah Trail. This center will be an important general tourist attraction and a specific attraction for amateur astronomers. It is an educational resource and board members are currently building a partnership with the city’s Parks and Recreation Department to offer field experiences to youth and parents.</p> <p>3. The tourist economy is supported by dark skies, increased visibility of the Milky Way and planets, and annual phenomena such as meteor showers. Darkness is itself an attraction because there is so little of it left in the southern California region.</p> <p>4. Research has shown that artificial lights interfere with nocturnal animals’ reproduction, foraging, safety, and circadian rhythms. Human health including sleep, circadian rhythms, and vision is affected by artificial light at night. Wasted outdoor lighting adds to the city’s carbon footprint and wastes money. Improved outdoor lighting which reduces brightness and glare also improves human safety, vision, and visibility at night.</p>	<p>based on the International Dark Sky Associations’ Model Lighting Ordinance to reduce excessively bright and fugitive light towards a goal of insignificant.</p> <p><b>Implementation Measure:</b> The City shall develop and implement an education and incentive program to support Code Enforcement and increase compliance with its outdoor lighting standards.</p> <p><b>Implementation Measure:</b> The city shall partner with JTNP and Sky’s the Limit to educate businesses and the public on the importance of dark skies to improve the health and economic wellbeing of our community.</p> <p><b>Implementation Measure:</b> The City shall partner with Sky’s the Limit and JTNP to increase astronomy based tourism by becoming an International Dry Sky Community.</p> <p><b>Implementation Measure:</b> The City shall reduce greenhouse gas emissions to improve the economy, human health, and habitat requirements for the desert’s nocturnal animals.</p>

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CO-65	Good Keep, however consider adding the following.	Require new residential development to participate in the California Energy Commission New Solar Homes Partnership and include onsite solar photovoltaic systems in at least 50% of the residential units (see <a href="http://www.gosolarcalifornia.ca.gov/nshp/index.html">http://www.gosolarcalifornia.ca.gov/nshp/index.html</a> ); -require onsite solar generation of electricity in new retail/commercial buildings and parking lots/garages (solar carports); -develop a program to provide innovative, low-interest financing for energy efficiency and renewable energy projects. For example, allow property owners to pay for energy efficiency improvements and solar system installation through long-term assessments on individual property tax bills.
CO-68 / Goal CO7.4	To vague, does not mention solar at all.	Expand Policies and Programs by adding that sources of renewable power that the City will investigate and implement <b>include (change to “should encourage”)</b> : installing solar photovoltaic systems to generate electricity for city buildings and operations; using methane to generate electricity at the City wastewater treatment plant; and installing combined heat and power systems.
CO-69 REMOVE???	Implementation Policy: CO-4.6 Require developers to phase and stage construction activities to reduce construction-related pollutant emission levels to the lowest level practical.	Isn't this automatic during CEQA EIR? If so insert "as required by CEQA".

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CO-69 <b>REMOVE???</b>	Implementation Policy: CO-4.7 Require developers to use water trucks and temporary irrigation systems, as well as other feasible measures, to limit fugitive dust emissions resulting from their activities in accordance with MDAQMD Rule 403.	Isn't this automatic during CEQA EIR? If so insert "as required by CEQA".
CO-69	Implementation Policy: CO-4.11 Develop a system of trails, paths and other rights-of way for the use of non-motorized transportation, including bicycles and walking.	Suggest adding "equestrian"
CO-71	CO 2.5 Limited, Are there other ways to encourage preservation than by an archaeologist? Maybe historian, historical society, biologist or the like.	Consult with historical society for local cultural and historic resources in the city.
CO-75	Alternative Energy The Twentynine Palms climate provides great potential for alternative energy development, using both solar and wind. While the City does not provide either electricity or natural gas to its residents, the City controls building codes and zoning codes which can encourage the use of such alternative sources by individual property owners as well as conservation of energy. Implementation policies dealing with this are provided in the section of this Element dealing with sustainable practices.	Suggest revising: the City has development Codes, Building codes and zoning codes that can encourage
CO-77	Change CN-4.14 to 4.18 to CO-4.14 to 4.18	Correction
	Currently written: Prepare and adopt development policies to leave active streams in the alluvial fans in a natural, unobstructed state. There are a variety of biological and CEQA issues involved with this statement. Also if you build up a pad, the water must course around the object and water does not always go where "we want" it.	The GPAC feels the goal is preserve the values and dynamic nature of alluvial fans. Our suggested language for 2.6 is: "Prepare and adopt development policies, which respect the biological values and dynamic nature of water movement on alluvial fans and leaves apparent active streams in a natural unobstructed state."

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