

GPAC COMMENT WORKSHEET FOR DRAFT GENERAL PLAN AND DRAFT EIR

COMMENTS BY: <i>Steve Whitten – Safety Element Comments</i>		DATE: <i>3 March 2011</i>
CHAPTER/ PAGE/ PARAGRAPH	COMMENTS	PROPOSED ACTION FOR GPAC'S CONSIDERATION
Safety Element, Page SF-1	<p>F-1</p> <p>PURPOSE</p> <p>Section 65302 of the State of California Government Code identifies seven mandatory elements in a General Plan, including Safety. Section 65302 (g) defines the hazards that need to be identified and addressed. These include:</p> <p>1) Seismic hazards, including strong ground shaking, surface fault rupture, and seismically induced ground failure, such as liquefaction and slope failures;</p> <p>2) Geologic hazards, including slope instability due to non-seismic causes, and subsidence;</p> <p>3) Flood hazards, including storm-induced flooding, inundation resulting from the failure of water reservoirs, dams, and levees, and areas vulnerable to flooding after wildfires; and</p> <p>4) Fire hazards, including both wildland fires and structure fires in the urban area.</p> <p>Also included within this Element are wind hazards, the management of hazardous materials and policies for dealing with disaster preparedness, response and recovery.</p>	<ol style="list-style-type: none"> 1. Suggest replacing “need” with “are required”. 2. Suggest list all the hazards to be identified, vice these include.

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Safety Element, Page SF-11	Map showing Seismic Hazards, Exhibit SF-1	It is my understand the West Bullion (Mtn) Fault may be in question by the USGS.
Safety Element, Page SF-16	<p>Tsunami/Seiche</p> <p>A tsunami is a sea wave caused by any large-scale disturbance of the ocean floor that occurs in a short period of time and causes a sudden displacement of water. Given Twentynine Palms's inland location, the tsunami hazard in the City is nil.</p> <p>A seiche is defined as a standing wave oscillation in an enclosed or semi enclosed, shallow to moderately shallow water body or basin. Given the lack of large bodies of water in Twentynine Palms, seiches as a result of ground shaking are not anticipated in the study area. Water in swimming pools is known to slosh during earthquakes, but in most cases, the sloshing does not lead to significant damage.</p>	Would a seiche apply to the aquifer's? They are enclosed.

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Safety Element, Page SF-20	In the Twentynine Palms region, groundwater occurs in sediment-filled basins that are floored by crystalline rock, and bounded on their sides by faults or rock – both of which act as barriers to groundwater movement. For the most part, groundwater replenishment (recharge) in the aquifers occurs naturally by infiltration of storm water runoff that percolates into the alluvial sediments. During the last few decades, the rate of groundwater extraction has exceeded the natural replenishment, resulting in declining water levels and overdraft of the groundwater supply in more densely populated areas. This condition has prompted the development locally of artificial recharge. The closest recharge sites to Twentynine Palms are percolation ponds in the Yucca Valley-Joshua Tree area that receive water from the California Aqueduct via the Morongo Pipeline. Twentynine Palms currently does not import water.	Is the statement of “artificial recharge” accurate for 29 Palms?
Safety Element, Page SF-29	The FIRMS that cover the Twentynine Palms area show that the flood areas identified generally cover the low-lying parts of the City that are most heavily populated, in addition to several washes that carry runoff to and from these populated areas (see Exhibit SF-2). It is important to note that FEMA did not study the entire General Plan area, and thus, the flood zones identified are potentially incomplete.	Clarify the term “FIRMS”

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Safety Element, Page SF-32	Implementation Policy: SF 2.6 Prepare and adopt development policies to leave active streams in the alluvial fans in a natural, unobstructed state.	Is this policy correct? Active Streams?
Safety Element	Flood Plain Notification – Purchasing or renting in these area's	Is this covered by Real Estate required disclosures?
Safety Element, Page SF-33	Implementation Policy: SF-3.1 Require property owners to maintain clearances between trees and power lines, to reduce the potential for downed trees and branches to come in contact with, and disrupt, adjacent distribution power lines, in conformance with the California Public Resources Code.	Suggest replacing "Require" with Encourage. Justification: Realistic view of City's ability to enforce this policy.
Safety Element, Page SF-33	Implementation Policy: SF-3.2 Require the undergrounding of overhead utility lines in new developments, and review the cost benefit of systematically undergrounding the existing overhead utility lines in the planning area, to help reduce the impact of windstorms on the City's power system.	Suggest replacing "Require" with Encourage. Justification: The cost benefit analyses.

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Safety Element, Page SF-36	Implementation Policy: SF-4.3 Conduct regular inspections of parcels throughout the City, and require property owners to bring their property into compliance with fire inspection standards, including weed abatement and to encourage homeowners to follow fire-safe practices, including maintaining a fire-safe landscape, and keeping combustibles (such as fire wood) a safe distance away from all structures.	Who is responsible for the regular inspections? City or Fire Department? Please clarify. Suggest Fire Department.
Safety Element, Page SF-43	Implementation Policy: SF-5.9 Require an analysis for the presence of other related hazardous chemicals, lead-based paints or products, mercury, and asbestos containing materials (ACMs) when buildings or other structures, asphalt or concrete-paved surface areas are being demolished. If other hazardous chemicals, lead-based paints or products, mercury or ACMs are identified, require proper precautions shall be taken during demolition activities and require the contaminants shall be remediated in compliance with California environmental regulations and policies.	These actions are covered by Federal & State laws & regulations. Suggest revising to “compliance with Federal & California environmental regulations and policies”. Staff: Who from the City ensure proper abatement procedures are followed.

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Safety Element, Page SF-45	Fire protection planning is a key consideration in new and modified developments in Twentynine Palms. For all discretionary applications and most administrative applications, including building permit applications, a description of the project and/or plans are sent to the Twentynine Palms Fire Department for comment and clearance. Developments within Twentynine Palms are required to comply with all applicable County and State fire codes to reduce the opportunities for fires to start and/or spread, provide for evacuation of occupants and provide access for firefighters to extinguish the fire.	Suggest recommending the City pursue bringing the Fire Department under the City umbrella vice the Water District.
Safety Element, Page SF-57	Implementation Policy: SF-6.5 Maintain mutual aid agreements with neighboring cities and the San Bernardino County Operational Area.	What about the Mutual Aid Agreements between DOD, Federal & State Agencies?

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